



Historic England

The Clerk
West Chiltington Parish Council
Parish Office
Church Street
West Chiltington
West Sussex, RH20 2JW

Our ref: HD/P5404/
Your ref:
Telephone 01483 252040
Fax

20th June 2017

Dear Sir or Madam,

West Chiltington Neighbourhood Development Plan 2017-2033

Thank you for your e-mail of 10th May advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.

On page 8 of the Draft Plan, it is stated that “*At paragraph 17, the NPPF introduces 13 core planning principles*” and then proceeds to list them. However, the list is of the 13 specific policy areas covered in the NPPF - paragraph 17 in fact introduces 12 core planning principles, which are different.

We welcome the references to the conservation area and listed buildings on page 10 and the identification of “many beautiful old buildings” and “great history and culture” as strengths of the village on page 11. We also welcome the more detailed description of the historical development of the village on page 12 and sub-section 3.4.1 on page 14.



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However, we consider that it would be helpful to say a little more about the conservation area either here or on page 13; e.g. when was it designated ? Has the designation been reviewed ? What is its special interest (the reason for designation) ? Is there a character appraisal and/or a management plan for the conservation area ?

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In addition, we would welcome further reference to the archaeological interest of the parish. What information is available from the West Sussex Historic Environment Record and Historic Landscape Character Assessment ?

The National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

Reference is made to the Wells Houses, but reference could also be made to the non-designated heritage assets set out in Schedule C. Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity and form an important part of the evidence base for the Plan. (We would, however, suggest that these assets are not referred to in Schedule C as “designated as non-designated assets”, which is a contradiction in terms. It would also be helpful to set out the criteria by which locally important heritage assets are identified).

Is the condition of heritage assets in the parish an issue ? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II buildings outside London. Has there been a survey of grade II buildings in the parish to ascertain their condition and whether or not any are at risk from neglect, decay or other threats ? Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

We welcome the reference to historic buildings in the Vision although we feel that the Vision could be clarified – as drafted it reads as a Vision more for the Plan than for the parish. Is this the intention ? Or is it intended that the Vision sets out how the community would like the parish of West Chiltington to be at the end of the Plan period, or perhaps further into the future, with the Plan being a mechanism to help achieve that vision ?



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We welcome the objective for housing to “complement the character, local distinctiveness and cultural heritage of the village, but are disappointed not to see a specific objective for the conservation and enhancement of the historic environment, particularly as this is considered a strength of the village and local residents apparently value their historic environment.

We have assessed the two proposed housing sites against our records of designated heritage assets. The site at Steele Close is within the setting of the Grade II listed Naldrett’s Farmhouse. Although we do not consider that this is a bar to the development of the site, we do consider that the northern boundary of the development needs to be considered carefully so as not to detract more than necessary from the significance and character of the farmhouse. We therefore consider that Policy H1 should contain a requirement to this effect.

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In addition, the Historic Environment Record should also be consulted for any records of archaeological finds on either of the proposed sites.

We welcome the references to the Horsham Landscape Character Assessment and Village Design Statement in Policy H1 as we consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We welcome Policy H2 as according with paragraph 58 of the National Planning Policy Framework, which states “...*neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.....Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.*” We also welcome Policy H4.

We welcome Policies EH7, EH8 and EH10 as conforming with the National Planning Practice Guidance, which advises neighbourhood plans to include policies to “*put broader strategic heritage policies from the local plan into action at a neighbourhood scale*”. We also welcome Policies EH13 (EH13.1) and EE6 (for its protection of archaeological, architectural or historic features).

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in West Chiltington, please do not hesitate to contact us.



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Thank you again for consulting Historic England.

Yours faithfully,



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Appendix: Sources of Information

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.historicengland.org.uk>

Heritage Gateway: includes local records of historic buildings and features
www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.historicengland.org.uk>

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>
has information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment.
www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://risk.historicengland.org.uk/register.aspx>

Placecheck provides a method of taking the first steps in deciding how to improve an area.
<http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>



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Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing,

<http://www.historicengland.org.uk/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by Historic England, uses good practice to support the creation and management of local heritage lists. <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <http://www.helm.org.uk/server/show/nav.19604>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place <http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



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