Dear Mrs Wilson

South Oxfordshire Local Development Framework – Core Strategy Examination

Thank you for your letters of 3rd and 23rd April inviting English Heritage to make representations on the matters raised in the National Planning Policy Framework and the proposed “model policy”.

English Heritage is very pleased to have worked closely with the Government on the National Planning Policy Framework to secure a positive result for heritage and sustainable development. As a consequence, English Heritage believes that the level of protection that PPS 5 gave to heritage has been maintained in the NPPF.

The NPPF contains a number of principles and policies relating to the historic environment. One of the key dimensions of sustainability set out in the NPPF is protecting and enhancing our historic environment (para.7). Economic, social and environmental improvement should be sought jointly and simultaneously (para.8). Pursuing sustainable development involves, inter alia, seeking improvements to the quality of the historic environment (para.9).

One of the twelve core principles that should underpin plan-making is that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17).

Local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. They should take into account: the desirability of putting heritage assets to a viable use consistent with their conservation; the contribution conservation makes to wider sustainability aims; and the desirability of new development contributing to local character (para.126).

Cont’d
Local plans should be consistent with the principles and policies set out in the NPPF, including those relating to the historic environment (para.150) and should include strategic policies to deliver conservation and enhancement of the historic environment, including landscape (paras 156+157). Local plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (para.158), including about the historic environment (para169).

It is quite clear, therefore, that, to be consistent with the NPPF, local plans should include strategic policies for the conservation and enhancement of the historic environment as part of a positive strategy for the conservation and enjoyment of that environment. The Core Strategy, as submitted, contains no specific historic environment policies nor any coherent strategy for the historic environment of the authority’s area; indeed, the historic environment does not form any part of the Council’s overall strategy for the district.

Accordingly, English Heritage considers the South Oxfordshire Core Strategy to be unsound as it is not consistent with national policy. This should be addressed through the inclusion of a more detailed comprehensive section on the historic environment of the district, a specific historic environment policy, and appropriate references elsewhere in the Core Strategy to the historic environment. English Heritage would be pleased to work with the District Council on these matters.

As regards the new planning policy for traveller sites, paragraph 9 sets out a number of requirements for local planning authorities in producing their Local Plan. Requirement e) is "protect local amenity and environment". Satisfaction of this requirement will be through the careful selection of new sites and so to accord with the new planning policy in this respect, English Heritage considers that Policy CSH5 should contain an additional priority for the location of new sites: ‘(iv) located so as to have no adverse impact on local amenity and environment’.

English Heritage has no comments on the proposed ‘model policy’ on sustainable development.

I do not consider it necessary from my perspective to request to appear at the Examination to give oral evidence on these matters, but I would of course be happy to do so should the Inspector feel that this would be of assistance.

Thank you.

Yours sincerely,

[Signature]

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