

HERITAGE - FOR EXAMINATION 30th APRIL 2018

In response to the Examiner's Questions "Has the Site Selection been robust and evidence based" and "Has the proposed allocation of the site properly taken account of heritage assets", I discuss how Heritage has been considered in the TSAs for each site that informed H2.

Six Acres is discussed first because clearly if the Neighbourhood Plan considers the potential heritage impacts acceptable here, then this sets the benchmark against which any heritage assessment of the other sites should be comparatively assessed.

SIX ACRES

RED in SAR Table 6.3. RED in TSA First Draft but downgraded to AMBER after Developer feedback.

TSA quotes from evidence from developer "several listed buildings and a Conservation Area lie close by". The reality is 23 listed buildings (listed and recognised by the QB on Page 91 TSA) and the conservation area meets the site boundary on two sides.

Robustness and Reliability of heritage assessments commissioned by a developer is questionable (they often subtly downplay effects), but these appear to be the QBs justification for downgrading to AMBER.

Comments by a reviewer on behalf of the QB (presumably a suitable qualified independent professional they have engaged) visible on pages 47 and 56 of the TSA suggest the QB has treated heritage "lightly", and expresses concern that a "*heritage assessment / masterplan*" has not been undertaken. There is the suggestion that the comments in the TSA have been amended at a very stage as a result of these comments.

Page 113 of the consultation report suggests that Six Acres heritage impact pre-mitigation is upgraded to red, however it is still shown as Amber in the Consultation version of the TSA.

Quite how it reduces to neutral after mitigation in the viability assessment is unclear, especially as SODC heritage professional concluded the level of harm after mitigation is at the top end of "less than substantial harm", one category below destruction of the asset. The external review commissioned by the QB also appears unconvinced.

Overall this aspect of the site selection process appears far from robust and "evidence based".

NORTH END (UF, CP)

UF RED and CP AMBER

In comparison with Six Acres both these appear unreasonably harsh and inconsistent.

UF has only one listed building adjacent and though the mitigation offered on Page 38 of the SAR is essentially the same as Six Acres, it remains "damaging" (Page 81 TSA).

Actually the Farmyard next to the listed building is an eyesore and NPPF also creates an obligation to **enhance** the setting of heritage assets where possible. So the alternative view here is that a sympathetically designed development on the farmyard would actually enhance the setting of this asset. The QB has failed to consider this.

CP is Amber even though the single listed building “opposite” is actually on the opposite side of the road “opposite” only a corner of the site, and very well screened even in winter by a large dense evergreen.

The justification for suggesting essentially the same mitigation at CP as provided for Six Acres may combine to “impact negatively” is not at all clear. The RED score in the viability assessment after mitigation appears harsh and unjustified especially compared to Six Acres with all the heritage impacts there.

Both sites bound the conservation area, but surely if the mitigated impacts are acceptable for Six Acres then they are equally acceptable for these sites?

PLOUGH FIELD

Assessed as RED in Table 6.3, but inconsistently graded AMBER on page 61 of the TSA.

The site does not border the conservation area and there are no listed buildings nearby with inter-visibility whose setting might be affected.

Even the AMBER grading seems to be based on the flimsiest of evidence that there might be archaeology, and it could have been part of a much larger site that once held a ploughing championship. TSA suggests no archaeology data was shared by the site promotor but in fact the Applicant’s archaeological report was publically available before the NP was submitted. The TSA could have been re-evaluated.

Assessing the site as RED in Table 6.3 and in the viability assessment is very harsh and inconsistent with 6A.

REDWOOD BARN

The NP relies on “*Some indications in adjacent field of some archaeological assets; further information would be required*” to assess the site as AMBER, and this is clearly inconsistent and hardly robust.

SUMMARY

Overall when considered and compared carefully it is clear that in respect of heritage the site selection process has not been consistent, robust and evidence based.

NOTES ON NEW NPPF

Since March 2018 this has been in its final stage of the consultation process and reflects policy changes in the way the NPPF protects heritage assets. It reflects current thinking from highest level policy makers and incorporates changes necessary as a result of heritage Case Law since the 2012 that required statutory clarification.

“Paragraph 189 has been revised to clarify that when considering the impact of a proposed development on a designated heritage asset, decision-makers should give great weight to the asset’s conservation irrespective of whether the potential harm to its significance amounts to ‘less than substantial harm’ or ‘substantial harm or total loss’ of significance.”

The Examiner is referred to Paragraphs 189 to 198 Considering Potential Impacts, and in particular the additional protection now given to Grade 2 listed buildings and their setting, like those around the 6 Acres. Also how less than substantial harm needs to be weighted against the public benefits.

While the new NPPF is not policy yet, it reflects current thinking at the highest level of government, and given the importance of heritage in this NP, I trust the Examiner will consider giving the new NPPF due weight when considering his judgement in respect of “has the proposed allocation of the site properly taken account of heritage assets”, and when balancing harm against benefits of Policy H2, which are actually very poorly defined in the NP.

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22nd April 2018