



Historic England

Our ref: HD/P5132/
Your ref:

Telephone 01483 252040
Fax

20th December 2017

Dear Ms Eustace,

Stewkley Neighbourhood Plan SEA Scoping Report Consultation

Thank you for your e-mail of 5th December addressed to Rob Lloyd-Sweet inviting Historic England to comment on the Stewkley Neighbourhood Plan SEA Scoping Report. Mr Lloyd-Sweet is currently on secondment to another team in Historic England and so I have picked up your consultation to respond.

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 interest: <http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

In addition, general guidance on Sustainability Appraisal and the historic environment is set out in Historic England's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment": <http://www.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>.

Turning to our specific comments, we welcome the inclusion of "*retain village character and heritage*" in the Vision of the SPNP, although we would prefer something more positive and proactive e.g. "*conserve and enhance, where possible, the village character and heritage*".

We also welcome "*Maintaining the character of the village by incorporating traditional design*" and, particularly, "*Conserve and enhance local heritage features and minimise the effects of development on the historic character of the village*", "*Ensure any new developments respect and reflect the key characteristics of the historic built environment in its form, layout, massing, materials and design*", "*To protect and develop Stewkley's rich heritage and history, while*



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preparing the village for the 21st Century” and “Protect the character principles of the conservation area” as objectives of the SPNP.

Given the references to character in these objectives, is there any characterisation study of the parish, or a Village Design Statement? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan as a characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

In addition, paragraph 58 of the National Planning Policy Framework 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.*” If there is no such “*understanding and evaluation*”, this should be identified as a gap in the baseline (and it may mean that the Plan is considered not to satisfy the basic condition of consistency with national planning policy).

We welcome the reference to the designated heritage assets, including the Conservation Area, in Section 4 of the Report. However, we would like to see more detail on the heritage assets of the parish. Our records show that there are 34 listed buildings and two scheduled monuments in Stewkley.

It would be helpful to explain when the conservation area was designated, whether or not the designation has been reviewed, what its special interest (the reason for designation) is and the date of its character appraisal and/or management plan if it has one or the other or both.

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*”.

Is there a list of locally-important buildings and features? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. If not, this should be identified a gap in the baseline. Have the Buckinghamshire Historic Environment Record and Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance?



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Is it the case that without a Neighbourhood Plan development could have a detrimental impact on heritage assets? Would legislation, the National Planning Policy Framework and the policies of the Aylesbury Vale District Local Plan and emerging Vale of Aylesbury Local Plan not provide sufficient protection?

Is the condition of heritage assets in the parish an issue? We note that there are no heritage assets in the parish identified as being at risk on the current Historic England Heritage at Risk Register, but the Register does not include grade II secular buildings outside London. Has there been a survey of the condition of grade II buildings in the Plan area to ascertain whether or not any are at risk? If not, this should be identified as a gap in the baseline.

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 SEA Objective 1 – Conservation & Heritage in principle, but we would prefer “conserve and enhance” to “sustain and complement” and “protect and complement” as more commonly-used terminology, particularly in the National Planning Policy Framework. We would also prefer the third bullet point to be “*Will the policies conserve and enhance the special interest, character and appearance of the Conservation Area?*”

We would expect the Scoping Report to set out the indicators or measures by which the policies and proposals of the Plan can be assessed against the objectives and sub-objectives. The Historic England advice on Strategic Environmental Assessments and the Historic Environment contains a range of possible indicators for assessing and monitoring the performance of the policies and proposals of the Plan against a historic environment objective. Not all of these will be relevant, but we suggest that the following be considered:

- the number and percentage of different heritage assets at risk;
- the percentage of planning applications where archaeological investigations were required prior to approval; and
- the percentage of planning applications where archaeological mitigation strategies were developed and implemented.

Finally, we would suggest that the preparation of the Neighbourhood Plan offers the opportunity to harness a community’s interest in the historic environment by getting the community to help add to the evidence base, perhaps by inputting to the preparation or review of a conservation area appraisal, a characterisation study of the parish as a whole, the preparation of a comprehensive list of locally important buildings and features, and/or a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats.

(Advice on characterisation and preparing a local list can be found using some of the links in the Appendix to this letter. We can also provide training on characterisation and preparing a local list and advice on undertaking a survey of Grade II buildings).

We hope these comments are helpful, but please contact me if you have any queries.

Yours sincerely,

A handwritten signature in black ink that reads "Martin Small". The signature is written in a cursive, slightly slanted style.

Martin Small
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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Appendix: Sources of Information



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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>

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 English Heritage 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>

