

## Liz Pulley

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**From:** Small, Martin <Martin.Small@english-heritage.org.uk>  
**Sent:** 10 February 2015 21:39  
**To:** Neighbourhood Planning  
**Subject:** Birdham Neighbourhood Plan  
**Attachments:** 2015-02-09 - Birdham NP - MS - comments on submission.doc

Dear Valerie,

Thank you for your e-mail of 11<sup>th</sup> December advising English Heritage of the publication of the Birdham Neighbourhood Plan. Please find attached our comments (please note, these are being sent by e-mail only).

Thank you.

Best wishes,

Martin

Martin Small | Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hants, IoW, South Downs and Chichester)  
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[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

English Heritage is changing into two organisations.

From Spring 2015, we shall become Historic England, a government service championing England's heritage and giving expert, constructive advice, and the English Heritage Trust, a charity caring for the National Heritage Collection of more than 400 historic properties and their collections.

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## Representation Form

### Birdham Neighbourhood Plan

#### The Neighbourhood Planning (General) Regulations 2012 - Regulation 16

Birdham Parish Council has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Birdham Neighbourhood Plan and supporting documents are available to view on the District Council's website: <http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00pm on Thursday 12 February 2015.**

**There are a number of ways to make your comments:**

- Complete this form on your computer and email it to: [neighbourhoodplanning@chichester.gov.uk](mailto:neighbourhoodplanning@chichester.gov.uk)
- Print this form and post it to us at: **Neighbourhood Planning, East Pallant House, 1 East Pallant, Chichester PO19 1TY**

All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Chichester District Council in line with the Data Protection Act 1998.

#### How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	MARTIN SMALL
<b>Address</b>	ENGLISH HERITAGE EASTGATE COURT 195-205, HIGH STREET GUILDFORD, SURREY
<b>Postcode</b>	GU1 3EH
<b>Telephone</b>	01483 252040
<b>Email</b>	<a href="mailto:martin.small@english-heritage.org.uk">martin.small@english-heritage.org.uk</a>
<b>Organisation (if applicable)</b>	ENGLISH HERITAGE
<b>Position (if applicable)</b>	PRINCIPAL ADVISER, HISTORIC ENVIRONMENT PLANNING
<b>Date</b>	9 <sup>TH</sup> FEB 2015

## PART B

To which part of the document does your representation relate?

Paragraph Number	Summary	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports the highlighting of the importance of the heritage of the parish in the Summary.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number	3.1	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports the section on the history and heritage of the parish. However, we suggest that specific mention could be made that the list of buildings and sites of architectural significance, local distinctiveness and character and historic importance is set out in Policy 1, although we also suggest that it might be preferable to set these out in an appendix to the Plan rather than in the Policy, as an appendix might be easier to update. We would also like to see more detail of the archaeological interest of the parish, with a reference to the Chichester Historic Environment Record. Reference could also be made to the Sussex Historic Landscape Character Assessment.

We find the description of the history and character of the various areas in the parish particularly interesting as English Heritage considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the Plan area. 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. We promote the use of characterisation toolkits such as "Placecheck", "Understanding Place" or the Oxford Toolkit. It would be helpful to show these areas on a map in the Plan. (See also our comments on Policy 4).

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Include a reference to the list of buildings and sites of architectural significance, local distinctiveness and character and historic importance set out in Policy 1 (or in an appendix) in this paragraph.

Include more detail on the archaeological interest of the parish with a reference to the Chichester Historic Environment Record.

Include a reference to the Sussex Historic Landscape Character Assessment.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number	3.8	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes the identification of “rich heritage” as one of the strengths of the parish in the SWOT analysis.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number	4.1	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage is disappointed that the Vision Statement contains no specific reference to the historic environment of the parish being conserved and enhanced. This is surprising given that the Summary of the Plan states that "Heritage is a fundamental quality of the Parish" and that the SWOT analysis identifies "rich heritage" as one of the Parish's strengths.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The addition of the following wording to the Vision:

"...and maintain **and enhance** the Area of Outstanding Natural Beauty, ecology, **heritage** and character of the harbour.....".

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number	4.2	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports the heritage objective, although we are not clear why this sub-section is headed "Summary of Objectives" – the objectives do not appear to be set out in any greater detail anywhere in the Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.



## PART B

To which part of the document does your representation relate?

Paragraph Number	Section 5	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

English Heritage suggests that reference is also made in the sub-section on Planning Policy Context to paragraphs 126 and 132-134 of the National Planning Policy Framework in respect of heritage assets.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

Add to the end of the third paragraph in this sub-section "Paragraph 126 explains that heritage assets are an irreplaceable resource and that local planning authorities should conserve them in a manner appropriate to their significance, further guidance on which is given in paragraphs 132-134 of the Framework."

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

# PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports Policy 1, although we suggest that it might be preferable to set out the list of buildings and sites of architectural significance, local distinctiveness and character and historic importance in an appendix to the Plan rather than in the Policy, as an appendix might be easier to update. It might also be helpful to indicate in the Policy that all the listed buildings and the buildings and sites identified are heritage assets.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Revise Policy 1 as follows:

“Any development must.....settlement separation

**These heritage assets include** the nationally Listed buildings.....and the following buildings and sites.....” [or “and the buildings and sites of architectural significance.....historic importance identified in Appendix 7.1B].

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	2
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports Policy 2 for the protection it affords to the archaeological interest of the parish. However, we suggest a reference to the Chichester Historic Environment Record be included in the supporting text.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The addition of the following wording to the supporting text:

“Information on archaeological finds within the parish is available from the Chichester Historic Environment Record”.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage is not clear exactly what is meant by “heritage landscape” and “agricultural heritage” either side of Lock Lane. Some explanation would be helpful (perhaps in Sub-section 3.1 in the text about Lock Lane) and, if appropriate, a reference to the Sussex Historic Landscape Character Assessment.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The inclusion of an explanation of what is meant by “heritage landscape” and “agricultural heritage” either side of Lock Lane, perhaps in Sub-section 3.1 in the text about Lock Lane.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	14
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

English Heritage welcomes and supports the requirement in Policy 14 that the scheme will not adversely affect any heritage assets.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

