

Liz Pulley

From: Small, Martin <Martin.Small@HistoricEngland.org.uk>
Sent: 19 March 2018 08:49
To: Neighbourhood Planning
Subject: RE: Selsey Neighbourhood Plan Consultation
Attachments: 2018-03-17 - Selsey NP - MS - comments on pre-submission.doc

Dear Sir or Madam,

Thank you for your e-mail of 9th February advising Historic England of the consultation on the Submission version of the Selsey Neighbourhood Plan 2017. Please find attached our comments (please note, these are being sent by e-mail only).

Thank you.

Yours faithfully,

Martin Small

Martin Small BA(Hons) BPl DipCM MRTPI
Principal Adviser, Historic Environment Planning | South East Planning Group

Direct Line: 01483 252040 | Mobile 07879 435867

Historic England
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-----Original Message-----

From: Lucy Harding [<mailto:lharding@chichester.gov.uk>] On Behalf Of Neighbourhood Planning
Sent: 09 February 2018 13:44
Subject: Selsey Neighbourhood Plan Consultation

Dear Sirs,

Consultation on the Selsey Neighbourhood Plan under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 (as amended)

Selsey Town Council as the qualifying body has prepared a neighbourhood development plan, entitled Selsey Neighbourhood Plan 2017, for their parish with the help of the local community. 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 Selsey Neighbourhood Plan and supporting documentation are available to view on the District Council's website:
<http://www.chichester.gov.uk/neighbourhoodplan#selsey>

Hard copies are available for inspection at:

Chichester District Council
East Pallant House,
1 East Pallant
Chichester PO19 1TY
(08:45 - 17:10 Mon - Thurs/ 08:45 - 17:00 Fri)

In Selsey:
Selsey Town Council,
Town Hall Complex,
55 High Street,
Selsey,
West Sussex
PO20 0RB.
(Opening hours are Monday to Friday, 9.30am to 4pm).

The period for submission of representations will run from Friday 9 February until Friday 23 March 2017. Representations should arrive no later than 5.00pm on 23 March 2017. All representations received will be available to view publicly.

To make representations:

- Printed response forms are available from the locations listed above or can be downloaded and filled in electronically by visiting <http://www.chichester.gov.uk/neighbourhoodplan#selsey>

Completed response forms should be sent to:

- Neighbourhood Planning, Chichester District Council, East Pallant House, 1 East Pallant, Chichester PO19 1TY • Or emailed to neighbourhoodplanning@chichester.gov.uk

Please note that any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan.

Kind regards,

Neighbourhood Planning

Chichester District Council

Tel: 01243 534571 |

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Historic England

Neighbourhood Planning
Chichester District Council
East Pallant House
1 East Pallant
Chichester, PO19 1TY

Our ref: HD/P5402/
Your ref:
Telephone 01483 252040
Fax

18th March 2018

Dear Sir or Madam,

Selsey Neighbourhood Plan 2017 Submission Consultation

Thank you for your e-mail of 9th February advising Historic England of the consultation on the Submission version of the Selsey Neighbourhood Plan 2017. We are pleased to make the following comments in line with our remit for the conservation and enhancement of the historic environment.

Whilst we welcome and support Policy 001 in principle, the requirements for new development to recognise the “distinctive character” of the Parish and for materials in any new development to complement the “established vernacular” seems rather at odds with the opening sentence in the section on Design and Heritage that “*there is no dominant architectural character or vernacular style to provide a reference for future development*”.

However, if Selsey is characterised by “quite distinct areas defined by the different styles of architecture prevalent at the time of construction”, then perhaps Policy 001 should refer to these distinct character areas. We note that Part 3 of the previous version of the Plan referred to a character assessment that had been undertaken for the Plan area. However, we cannot find any reference to the character assessment in the revised version of the Plan (unless this is the “Neighbourhood Audit” ?)

Historic England previously welcomed the character assessment 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, in accordance with paragraph 58 of the National Planning Policy Framework, which states that Local and 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*” (our underlining).



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As drafted we consider it doubtful that Policy 001 is really sufficiently robust or comprehensive to meet this requirement, but we do consider that the Neighbourhood Audit does provide the required “*understanding and evaluation of its defining characteristics*”.

We welcome and support Policy 002, although again the issue of the character of existing development arises. The policy refers to Conservation Areas but the opening text to this section suggests that there is only one. We (and the National Planning Policy Framework) refer to the “significance” of historic buildings and sites, so we would prefer the third bullet point to say “...significance, local distinctiveness and character.....”.

We welcome and support the third bullet point of Policy 006 that “*The proposal conserves and enhances key historic features of the existing building*”.

We welcome the reference in the vision for 2029 to a design code working alongside national planning policy to help protect and enhance the town’s iconic buildings and heritage assets. However, we have previously noted that we could find no reference in the design code to the conservation and enhancement of the significance of heritage assets and now we cannot find any further information in the Plan about the design code.

We are not sure why the section on Sustainability does not include any reference to the historic environment. The National Planning Policy Framework makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainability: paragraph 7 refers to the three dimensions of sustainable development and the consequent need for the planning system to perform a number of roles, with “*contributing to protecting and enhancing our natural, built and historic environment*” part of the environmental role. Paragraph 9 states “*Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment*”.

We welcome the description of the historical development of Selsey in Annex B, including the sequence of historical maps. However, we consider that some more detail on the Selsey Conservation Area would be helpful - when was it designated and what is its special interest (the reason for designation) ?

We welcome the information on the grade I and 68 grade II listed buildings in the parish identified on the National Heritage List for England in Annex B. However, some further information would be helpful e.g. do they represent a particular period of development of Selsey ? Are they concentrated in one place or scattered ? Do they tell us anything about the history and historical development of Selsey ?

The National Planning Practice Guidance considers that it would be helpful for Neighbourhood Plans 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*” and “*about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

We note the identification of “iconic buildings” on the map on page 6; does this constitute a list of locally important historic buildings ? (Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity).

However, what information is there on the Chichester Historic Environment Record about non-designated archaeological sites ? Is there any information on historical landscape types in the Plan area in West Sussex Historic Landscape Character Assessment ? (We do acknowledge that this information is not specifically required to meet the basic conditions).

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 listed secular buildings outside London. Has a survey of the condition of grade II buildings in the Plan area been undertaken ?

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 ? (Again, this information is not specifically required to meet the basic conditions).

Finally, 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, the characterisation of the Plan area, the preparation of a comprehensive list of locally important buildings and features, or a survey of grade II listed buildings to see if any are at risk from neglect, decay or other threats.

In summary, with the possible exception of the requirement of paragraph 58 of the National Planning Policy Framework for Neighbourhood Plans to “... *develop robust and comprehensive policies that set out the quality of development that will be expected for the area*”, we consider that the Selsey Neighbourhood Plan satisfies the basic conditions as regards its consideration of the historic environment.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting Historic England.

Yours faithfully,

Martin Small

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

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