

**Consultation comments on HE2 – All heritage assets (designated and non-designated)**

- Support - 17
- Neither support of object - 1
- Object – 4

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

| <b>Comments which support policy HE2 – all heritage assets</b> |  |   |
|--|--|---|
| <b>Respondent number</b>                                       | <b>Comment</b>   | <b>Officer comment</b>  |
| ANON-KSAR-N8MP-M   | <p>[This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations which includes the relevant figures and appendices, with tables correctly formatted.</p> <p>Paragraph 189 of the Framework seeks to conserve and enhance the historic environment and sets out that heritage assets are an irreplaceable resource that should be conserved so they can be enjoyed for their contribution to the quality of life or existing and future generations. Winchester has a rich and diverse historic environment that provides a valuable contribution to its identity and culture. Strategic Policy HE1 confirms the Plan will protect the district's designated and non-designated heritage assets in accordance with the Framework and Policies HE2-HE14 set out the approach through which this will be achieved.</p> <p>Crest Nicholson is broadly supportive of the aims of these Policies and notes the development proposal for land in the North Whiteley MDA is not located in close proximity to any designated or non-designated heritage assets and the allocation of further growth in this location will therefore reduce development pressure on the district's historic environment.</p> | <p><b>Support welcomed and comments noted</b></p> <p><b>Recommended response: no change</b></p> |

| <b>Comments that object to policy HE2 – all heritage assets</b> |   |  |
|---|---|--|
| <b>Respondent number</b>  | <b>Comment</b>  | <b>Officer comment</b>   |
| ANON-KSAR-NKGQ-2  | There should be explicit mention of roads so as to preserve townscapes. | <p><b>Comments noted</b></p> <p><b>Officer response:</b> Proposed additional supporting text for policy HE1 here:</p> <p><b>The historic environment is all around us, through the ways that the landscape of our countryside and streetscapes of our settlements have been used and enjoyed in the past. The remains of man-made changes to the environment are the evidence of our heritage, and where these remains have heritage significance and are sufficiently well-preserved, they will be considered as heritage assets, for the purposes of decision making in planning applications.</b></p> |

|                  |  |   |
|------------------|--|---|
| ANON-KSAR-NKA3-X | <p>Policy HE2 All heritage assets (both designated &amp; non-designated) and Policy HE13 Non-designated historic rural and industrial heritage asset</p> <p>Policy HE2 sets out a process for producing heritage information in support of development proposals, but is weak in terms of actual protection offered to those designated and non designated heritage assets. Policy HE13 provides for the change of use of non-designated heritage assets in certain circumstances but is limited in its scope to rural areas. Such protection should also be afforded to non designated assets within town centres and settlement boundaries. The wording of these policies should be tightened up so that when allocating sites for development, there is greater recognition of the need to avoid impacts on heritage assets, both designated and non designated.</p>      | <p><b>Comments noted.</b></p> <p>For non-designated heritage assets, this is not a formal designation and is only something the Council would recognise during the determination of a planning application. HE4 sets out the policy for non-designated heritage assets.</p> <p><b>Recommended response: no change</b></p> |
| BHLF-KSAR-N8BD-W | <p>The Trust supports all the recommendations in the Historic Environment chapter of the Integrated Impact Assessment published in October 2022.</p> <p>Policy HE2 - All heritage assets (both designated and non-designated)</p> <p>Objections and comments</p> <p>The Trust supports the requirement that all applications require a Heritage Statement except householder applications where this can be incorporated into the Design and Access Statement.</p> <p>The Trust objects to weaker wording, compared to policy DM 29 of the adopted Local Plan, from: “loss only allowed exceptionally” to “Heritage assets should be conserved in a manner appropriate to their significance” especially as responsibility for defining the significance is delegated to the applicant. If Policy HE2 goes forward it should include the relevant wording from the NPPF.</p> | <p><b>Comments noted</b></p> <p>The wording of HE2 has been amended to take account for changes suggested by Historic England. Local Plan policies should not, as a matter of practice, just repeat the wording in the NPPF. See point below.</p> <p><b>Recommended response: no change</b></p>                           |
| BHLF-KSAR-N8BQ-A | <p>The greater clarity, the wording in the opening paragraph of this policy would benefit from minor amendment, acknowledging the need for desk-based assessment for all applications on sites that include, or have the potential to include heritage assets with archaeological interest, in accordance with</p>   | <p><b>Comments noted and welcomed.</b></p>  |

|   |   |  |
|---|---|--|
| <p>Historic England<br/><a href="#">Link here</a></p> | <p>paragraph 194 of the NPPF i.e. that aspect does not need the qualifier “where necessary”. We suggest alternative wording for consideration.</p> <p><b>Changes to policy text outlined below:</b><br/>Heritage assets should be conserved in a manner appropriate to their significance. Applicants must describe the significance of any affected heritage assets, using appropriate expertise and assessment, <b>including where necessary, e.g. heritage impact assessment, desk-based assessment (where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest), and where necessary heritage impact assessment and/or</b> field evaluation (<b>the results from</b> which needs to be submitted in a Heritage Statement).<br/>All applications which affect or may affect heritage assets should be accompanied by a <del>h</del><b>H</b>eritage <del>S</del><b>S</b>tatement, proportionate to the nature of the development and heritage interest, describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm. For minor or householder applications, where there is a limited impact on heritage assets, this can be incorporated into the Design and Access Statement.</p> | <p>Proposed changes to the left have been agreed to.</p> <p>New text = <b>bold</b><br/>Removed text = <del>strikethrough</del></p> |
|---|---|--|

| <b>Comments which neither support or object to policy HE2 – all heritage assets</b> |   |  |
|---|---|--|
| <b>Response ID</b>  | <b>Comment</b>  | <b>Officer Response</b>  |
| BHLF-KSAR-N8BX-H  | <p>The Historic Environment Strategic Policy HE1 HE2 HE8 HE9 HE14</p> <p>The Trust supports the aspiration for a ‘positive Policy’ when dealing with heritage assets, but subject to such Policy recognising that such assets must ‘make a practical contribution’ by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust is concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with</p> | <p><b>Comments noted</b></p> <p>WCC is committed to support HHFT in their effective use of the historic buildings within their estate. These policies are not intended to preclude this, rather to ensure that all works</p> |

|  |  |   |
|--|--|---|
|  | <p>modernised or High Tec infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation. The Trust suggests that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations. (CN1 CN2 CN6),</p> | <p>and alterations to them are carefully considered to ensure that the significance is sustained, and that any harm is thoroughly justified and minimised where possible. WCC recognises the contribution made by the reuse of buildings, historic or otherwise, to protect embodied carbon in the journey to net-zero.</p> <p><b>Recommended response: no change</b></p> |
|--|--|---|

| <b>Respondent number</b> | <b>Comment</b>   | <b>Officer comment</b>   |
|--------------------------|--|--|
| ANON-KSAR-N8EX-M         | <p>Policy HE2 sets out a process for producing heritage information in support of development proposals, but is weak in terms of actual protection offered to those designated and non designated heritage assets.</p> | <p><b>Comments noted</b></p> <p><b>Recommended response: Change the wording of policy HE2 as outlined below to strengthen the policy.</b></p> <p>Heritage assets should be conserved in a manner appropriate to their significance. Applicants must describe the significance of any affected heritage assets, using appropriate expertise and</p> |

|  |  |  |
|--|--|--|
|  |  | <p>assessment, <b>including a</b> <del>where necessary, e.g. heritage impact assessment, desk-based assessment</del> <b>(where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest), and where necessary heritage impact assessment and/or field evaluation (the results from which needs to be submitted in a Heritage Statement).</b></p> <p>All applications which affect or may affect heritage assets should be accompanied by a <del>Heritage</del> <b>S</b>statement, proportionate to the nature of the development and heritage interest, describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm. For minor or householder applications, where there is a limited impact on heritage</p> |
|--|--|--|

|  |  |   |
|--|--|---|
|  |  | assets, this can be incorporated into the Design and Access Statement. <b>Any proposals for heritage assets included in the council's 'Buildings at Risk Register', or the Historic England 'Heritage At Risk Register', shall include works to enable the removal of that heritage asset from those registers.</b> |
|--|--|---|

|                      | <b>Recommendations</b>      | <b>Officer response</b> |
|----------------------|-----------------------------|-------------------------|
| Comments from SA/HRA | No recommendations provided | N/A                     |

### Amendments to policy HE2

Heritage assets should be conserved in a manner appropriate to their significance.

Applicants must describe the significance of any affected heritage assets, using appropriate expertise and assessment, including a ~~where necessary, e.g. heritage impact assessment,~~ desk-based assessment **(where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest), and where necessary heritage impact assessment and/or** field evaluation **(the results from** which needs to be submitted in a Heritage Statement).

All applications which affect or may affect heritage assets should be accompanied by a ~~H~~**H**eritage ~~S~~**S**tatement, proportionate to the nature of the development and heritage interest, describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm. For minor or householder applications, where there is a limited impact on heritage assets, this can be incorporated into the Design and Access

**Statement. Any proposals for heritage assets included in the council's 'Buildings at Risk Register', or the Historic England 'Heritage At Risk Register', shall include works including repairs to enable the removal of that heritage asset from those registers.**