

Consultation comments on Policy HE3 – Designated heritage assets

- Support - 11
- Neither support of object - 0
- Object – 1

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.

Comments that support policy HE3 – designated heritage assets		
Respondent number	Comment	Officer comment
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 OBO Crest Nicholson’ 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</p>	<p>Support welcomed and comments noted</p> <p>Officer response: no change</p>

	allocation of further growth in this location will therefore reduce development pressure on the district's historic environment.	
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Comments which object to policy HE3 – designated heritage assets		
Respondent number	Comment	Officer comment
BHLF-KSAR-N8BQ-A Historic England Link here	<p>The wording refers to “significance of any harm” which is the not quite right – a more appropriate phrase would be the scale of harm to significance.</p> <p>Overall, the balance between this policy and the detailed asset-specific policies would benefit from further reflection. Assuming a policy on designated heritage assets is included in the Plan, the wording needs to include more detail on considerations that are common to all types of designated heritage asset.</p> <ul style="list-style-type: none"> • The draft policy currently omits wording that the more important the asset, the greater the weight should be. This should be rectified. • We note that the policy is silent on the justification to any harm, which the Council will need to consider when undertaking a balancing exercise. • The policy does not refer to the approach taken when considering different levels of harm, having assessed the scale of harm as outlined. <p>We suggest wording for consideration that takes account the above. While it makes for a long policy, there is a risk that, although there is a lot of (welcome) content in this heritage section of the plan, its high level of detail may suggest comprehensiveness which is not there.</p> <p>Changes to policy text outlined below:</p> <p>The council will apply the relevant policy (or policies) in the NPPF when assessing the magnitude significance of any harm to the significance of a designated heritage asset. Great weight will be given to the conservation the affected asset(s), regardless of whether the harm is considered to be less than substantial, substantial, or total loss. (and the more important the asset the greater the weight should be).</p>	<p>Comments noted and welcomed</p> <p>Agree to suggested changes and altered policy can be seen to the left</p> <p>New text = bold Removed text = strikethrough</p>

Any harm to the significance of designated heritage assets should be clearly and convincingly justified

Substantial harm to highly graded designated assets¹ should be wholly exceptional. Substantial harm to other designated assets should be exceptional²

The most severe level of harm Substantial harm to designated heritage assets should be refused unless it is demonstrated that substantial public benefits outweigh the harm, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

All other harm classified as Less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimal viable use.

Supporting information (footnotes):

¹ Registered battlefields, grade I and II* registered parks and gardens, scheduled monuments and non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments.

² Grade II listed buildings, grade II registered parks and gardens and conservation areas.

	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

Amendments to Policy HE3

Amendments to supporting text

Additional Supporting information (footnotes):

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