

Consultation comments on policy HE7 – non-designated archaeological assets

- Support - 11
- Neither support of object - 0
- Object - 2

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 HE7 – non-designated archaeological 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</p>	<p>Comments noted and support welcomed</p> <p>Recommended response: no change</p>

	<p>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>	
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Comments that object to policy HE7 – non-designated archaeological assets		
Respondent numbers	Comments	Officer comments
ANON-KSAR-NKA4-Y	<p>Policy HE7 (page 201 of the draft plan) – Non-designated archaeological assets. This policy is, I believe, unsound in its entirety. This is because it provides a presumption in favour of the destruction of the subject assets, while missing the point that assets may be non-designated because they have not, at the relevant time, been adequately explored and identified. A desk-top study won't by itself necessarily provide sufficient information, and while it may be acceptable for low-grade assets to be destroyed, following their record, there needs to be put in place a mechanism for converting non-designated archaeological assets to designated assets following their</p>	<p>Comments noted</p> <p>Policy HE7 should be read alongside other policies in the LP including: Overarching HE policies HE2, HE3, HE4 HE6. Considerations under HE7 would follow on from earlier assessments as to significance and consideration of harm arising from proposals. HE7 secures mitigation where harm has already been determined may be acceptable and does</p>

	<p>correct identification and evaluation. This whole policy needs to be withdrawn and rethought.</p>	<p>already specifically refer to the need for field evaluation not just a desk-top study.</p> <p>The power to designate archaeological assets is not held by the City Council but with the Secretary of State for Culture, Digital, Media and Sport who are advised by Historic England. However as is set out in both the NPPF and HE3 non-designated assets of national significance should be treated as though they are designated.</p> <p>In order to safeguard this point the following text in bold and underlined below has been added to the policy HE7:</p> <p>Development proposals should be supported by proportionate evidence describing the significance of any archaeological assets affected, including any contribution made by their settings. Where a development site includes or has the potential to include archaeological assets, early discussions will need to take place with the</p>
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		<p>Council/archaeological advisor. A desk-based assessment and, where necessary the results of a field evaluation (conducted by a suitably qualified archaeological organisation), must be submitted to the local planning authority.</p> <p>Recommended response: no change</p>
ANON-KSAR-NKXV-R	<p>From Policy DM26, the point about good design to preserve the archaeological remains in situ by sensitive layout and design has completely been lost.</p> <p>I think this needs to be added back in so that preservation of below ground heritage assets is prioritised over convenience of a developer.</p>	<p>Comments noted</p> <p>The requirement to conserve archaeological remains appropriate to their significance is covered by the NPPF (chapter 16) and in Policies HE2 and HE6 of the Reg 18 LP which Policy HE7 should be read alongside. Such conservation, depending on the significance of the remains would be via excavation/recording or for designated remains / non-designated remains of national significance in particular, through sensitive design / layout.</p> <p>The identification of the need for physical conservation would generally be taken</p>

		<p>ahead of determination of applications with proposals already designed accordingly. Developers would have already commissioned archaeological work to assess the nature and significance of archaeological remains which might be affected by development proposals and what determine mitigation is be required.</p> <p>Recommended response: no change</p>
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	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

Amendments to Policy HE7

Non-designated archaeological assets

In addition to the policies that apply to all heritage assets and non-designated heritage assets, the following also applies.

Development proposals should be supported by proportionate evidence describing the significance of any archaeological assets affected, including any contribution made by their settings. Where a development site includes or has the potential to include archaeological assets, **early discussions will need to take place with the Council/archaeological advisor**. A desk-based

assessment and, where necessary the results of a field evaluation (conducted by a suitably qualified archaeological organisation), must be submitted to the local planning authority.

Where development affecting archaeological assets is permitted, developers will be required to record and advance understanding of any assets to be lost (wholly or in part) in accordance with a written programme of archaeological investigation, including excavation, recording and analysis, to be undertaken by an appropriately qualified archaeological organisation. The results and analysis of investigations should be published and provided to the local authority for inclusion in the Winchester Historic Environment Record. Where development affecting archaeological assets is permitted, developers will be required to record and advance understanding of any assets to be lost (wholly or in part) in accordance with a written programme of archaeological investigation, including excavation, recording and analysis, to be undertaken by an appropriately qualified archaeological organisation. The results and analysis of investigations should be published and provided to the local authority for inclusion in the Winchester Historic Environment Record.