

Consultation comments on Policy HE8 – Applications affecting listed buildings

- Support - 11
- Neither support of object - 2
- 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 HE8 – applications affecting listed buildings		
Respondent number	Comment	Officer comment
ANON-KSAR-NKXV-R	I think 'setting' should be added in. ie. Original features and elements that make a positive contribution to the significance and/or character and/or setting should be retained....	Comments noted This policy was written with Historic England’s assistance and significance and character is mentioned in the policy specifically. It is also important to remember that the Local Plan should be read as a whole and other policies within this topic of Historic Environment. ‘Setting’ is mentioned several times throughout most of the Historic Environment policies and their supporting text The following is outlined in Policy HE9: ' <i>Deal comprehensively with the intended use and operation of the</i>

		<p><i>whole building and site, and contain sufficiently detailed information to understand the full impact of the proposals internally and externally; including the setting; Propose a use which would not be harmful to the special interest of the building or its setting;'</i></p> <p>Recommended response: no change</p>
<p>ANON-KSAR-N8MP-M</p>	<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 allocation of further growth in this location will therefore reduce development pressure on the district's historic environment.</p>	<p>Comments noted and welcomed</p> <p>Recommended response: no change</p>

Comments that neither support or object to policy HE8 – applications affecting listed buildings		
Respondent number	Comment	Officer comment
BHLF-KSAR-N8BQ-A Historic England Link here	<p>We suggest a minor wording change to align with the language used in the NPPF on justification.</p> <p>We advise deletion of the line regarding alterations and extensions, as all design proposals are considered on a case by case basis.</p> <p>Furthermore, especially given the Council plans to include policy HE9 on change of use, we do not believe reference to use of the building is needed in this policy.</p> <p>We have suggested revised wording on design quality for consideration.</p> <p>Changes to policy text outlined below:</p> <p>Applications affecting listed buildings (whether for listed building consent or planning permission) should demonstrate a proportionate understanding of the building and its significance, which. This should inform proposed interventions, as should be long term use and conservation of the building. Original features and elements that make a positive contribution to the significance and/ or character should be retained unless there is clear and convincing a reasonable justification for their removal, in line with policy HE3 on designated heritage assets.</p> <p>For alterations and extensions, the council will consider design proposals on a case by case basis. However, the required standard of design quality will need to be appropriate for the listed building.</p> <p>Design quality of a high standard will be expected to ensure preservation of the buildings significance</p> <p>Supporting information tweaks</p>	<p>Comments noted and welcomed</p> <p>Agree to suggested changes and policy altered accordingly to wording of policy which can be seen to the left.</p> <p>New text = bold</p> <p>Removed text = strikethrough</p>

	<p>8.15 The building’s list entry should also be referred to; however, the reproduction of this entry is usually not this may not be enough to successfully identify identify describe significance. All relevant sources of information should be considered and appropriate expertise may be is required where necessary. Further information can be found in Historic England’s Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets.</p> <p>Para 8.16 comment We suggest a minor wording change to align with the language used in the NPPF on justification.</p> <p>8.16 As listed buildings are irreplaceable, any harm or loss should require clear and convincing justification, and applicants will need to show that the benefits of their proposals outweigh any harm to the significance of the listed building.</p> <p>The building’s list entry should also be referred to; however, the reproduction of this entry is usually not this may not be enough to successfully describe identify significance. All relevant sources of information should be considered and appropriate expertise may be is required where necessary.</p> <p>As listed buildings are irreplaceable, any harm or loss should require clear and convincing justification, and applicants will need to show that the benefits of their proposals outweigh any harm to the significance of the listed building.</p>	
BHLF- KSAR- N8BX-H	<p>The Historic Environment Strategic Policy HE1 HE2 HE8 HE9 HE14 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</p>	<p>Comments noted</p> <p>WCC is committed to support HHFT in their effective use of the historic buildings within their estate.</p>

	<p>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 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>These policies are not intended to preclude this, rather to ensure that all works 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>Recommended response: no change</p>
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Comments that object to policy HE8 – applications affecting listed buildings		
Respondent number	Comment	Officer comment
ANON-KSAR-N8EJ-6	<p>Basically I support the policy but consideration should be given to the application of measures to ensure a building is meeting the current insulation requirements. It is quite possible to add insulation which doesn't damage the structure but may cover some original features and surely this is an acceptable solution.</p>	<p>Comments noted</p> <p>The very nature of historic asset means careful consideration needs to be given to insulation and this is covered in more detail in HE14</p> <p>Recommended response: no change</p>

BHLF- KSAR- N8BD-W	Policy HE8 - Applications affecting listed buildings Objections and comments The Trust requests that if Policy HE8 delegates justification of any harm via Policy HE3 to the NPPF, it should include the relevant wording from the NPPF.	Comments noted It is important that the LP does not reiterate the same wording in the NPPF Recommended response: no change
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	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

Amendments to policy HE8

Amendments to supporting text

Para 8.15

The building's list entry should also be referred to; however, the reproduction of this entry is usually not ~~this may not be~~ enough to successfully identify **describe** significance. **All relevant sources of information should be considered** and appropriate expertise **may be** ~~is required where necessary~~. Further information can be found in Historic England's Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets.

Para 8.16

As listed buildings are irreplaceable, any harm or loss should require clear **and convincing** justification, and applicants will need to show that the benefits of their proposals outweigh any harm to the significance of the listed building.

Amendments to policy HE8

Applications affecting listed buildings (whether **for** listed building consent or planning permission) should demonstrate a proportionate understanding of the building and its significance, **which** ~~This~~ should inform proposed interventions, ~~as should be long-term use and conservation of the building.~~ Original features and elements that make a positive contribution to the significance and/or character should be retained unless there is **clear and convincing** ~~a reasonable~~ justification for their removal, in line with policy HE3 on designated heritage assets.

~~For alterations and extensions, the council will consider design proposals on a case-by-case basis. However, the required standard of design quality will need to be appropriate for the listed building.~~ **Design quality of a high standard will be expected to ensure preservation of the building's significance.**