



Historic England

FAO:
The Planning Policy team
Winchester City Council

Our ref: PL00472145

planningpolicy@winchester.gov.uk
by email only

11 October 2024

Dear Planning Policy team

Winchester City Council's Regulation 19 Local Plan 2020 - 2040

Thank you for consulting us about Winchester City Council's Regulation 19 Local Plan 2020 – 2040. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We welcome the collaborative approach taken by the Council and further refinements to the plan following Regulation 18, adding clarity and nuance to its heritage content.

We support much of the plan; however, we highlight in Appendix A and in our response via the online portal the following policies in the Regulation 19 local plan that we consider to be unsound as worded. This includes:

- Policy CN2: Energy Hierarchy
- Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions
- Policy HE6: Scheduled Monuments and Nationally Important Non-designated Assets
- Policy HE12: Registered Historic Parks and Gardens
- Policy HE14: Improvements or Alterations to Improve the Energy Efficiency of Historic Assets
- Policy OT01: Land east of Main Road

Having discussed these matters with you during the consultation period, we have agreed changes that address our concerns on these specific policies, which follow our suggested wording in Appendix A below, plus:



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- a) the addition of minor additional changes to policy HE6: in the paragraph on non-designated archaeological assets that are potentially of national importance amend the text as follows: “and the steps that would be taken to firstly avoid harm and if unavoidable to ~~and~~ minimise harm”.
- b) proposed new wording put forward by the Council regarding policy OT01, including a new criterion in the policy that is similar to the archaeological criterion in policy WK6, and the following new paragraph in the supporting text: “Further archaeological evaluation of the site will be needed prior to development to ascertain the full nature of the archaeological resource within the site. Records indicate that a Roman road runs through the site. Should archaeological investigation indicate good survival, the site development should be informed by and sensitive to any such remains, as they could be categorised as a non-designated heritage asset and, potentially, nationally important.”

Subject to implementation of these changes, we do not raise any concerns associated with soundness or legal compliance.

Also in Appendix A, we make a number of suggestions that we believe would add valuable detail to the plan and support its effective implementation. We would be happy to discuss any further minor improvements to the plan as needed.

That being so, while we do not anticipate needing to participate in the Examination in Public, we would be happy to do so to explain and clarify our concerns if necessary; to take part in any discussions on the matter; and to answer any questions the Inspector may have.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, RTP1
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Appendix A: Table of Historic England's comments on the proposed submission Winchester Local Plan 2020 - 2040

Page	Section	Sound/ Unsound	Comments	Suggested Change
19	Vision	Sound		
20 / 21	Objectives	Sound		
23 / 24	Strategic Policy SP2: Spatial Strategy and Development Principles	Sound		
27	Strategic Policy SP3: Development in the Countryside	Sound		
33 / 34	Planning and Designing for Carbon Neutrality – key issues	Comment	We encourage adding text that recognises the contribution that heritage can make to climate change mitigation and adaptation. This includes support for building retention, repair and reuse and the sensitive adaptation of traditionally constructed buildings to improve their carbon and energy efficiency. This would help to support the opening of policy CN1. We would be happy to liaise further on suitable text if needed.	
37 / 38	Strategic Policy CN1: Mitigating and Adapting to Climate Change	Sound		
39	Development and Re-use of Buildings	Comment	This page is headed Development and Re-use of Buildings, but the text does not really cover that. Should the heading change, or (and this is our preference) could additional text be added on the contribution made by the re-use of buildings? This could also help to signpost to the heritage section of the plan, acknowledging that a fabric first approach is NOT appropriate for traditionally constructed buildings. We would be happy to comment on any additional text if needed.	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
39 / 40	Policy CN2: Energy Hierarchy and paragraph 4.19	Object / unsound	Without text highlighting that a fabric first approach is NOT appropriate for traditionally constructed buildings, we are concerned that this policy could result in maladaptation of historic buildings. The policy refers to all development, rather than <u>new</u> development. As such it could apply to the adaptation of existing buildings. This risks harm to heritage assets that would run counter to the plan's heritage policies and national policy. Also, should the "Minimise energy demand" point be formatted with a bullet?	In the policy: "All development shall accord with the following energy hierarchy (in order of preference): <ul style="list-style-type: none"> • Minimise energy demand: <u>for new build this is done</u> by employing the 'fabric first approach'; • Maximise energy efficiency; • Utilise renewable energy; and • Utilise low carbon energy." In the supporting text: "Not only is the 'fabric first' approach the most sustainable and environmentally best approach <u>for new build</u> , but it can also make an important contribution to addressing fuel poverty and improving social equity. <u>A fabric first approach is not appropriate for traditionally constructed buildings, as outlined in the text supporting policy HE14.</u> "
41 / 42	Paragraphs 4.20 and 4.24	Comment	The 2 in CO2 should be subscript rather than superscript	
46	Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions	Object / unsound	Is the intention for the text on non-residential development to apply only to new non-residential development? What if the building is listed? Would the Council seek to implement the same policy approach? Currently this is unclear. We note the section on residential development makes clear in its wording and subheading that it applies only to new development. The same cannot be said of non-residential development.	"<u>New non-residential development</u> v. <u>New non-residential development</u> should meet the 'BREEAM Excellent' standard or an agreed equivalent industry standard assessment process. Developers that propose a scheme to meet BREEAM standards should submit a post construction assessment and BREEAM certificate to the local planning authority to demonstrate compliance. At outline planning application stage a commitment to BREEAM Excellent should be made, and at full planning application a BREEAM pre-assessment should be provided."



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			We believe this should refer to “ <u>New</u> non-residential development” to avoid potential policy support for a standard that could be inappropriate and harmful for certain historic buildings.	
52	Policy CN5: Renewable and Low Carbon Energy Schemes	Comment	Naturally we welcome policy support for heritage conservation; but also we wish to support renewable energy. Set in that context, we query the deliverability of a policy approach that requires no harm to heritage significance. We wonder if “significant” should be added before “adverse”. Alternatively, we note that policy CN6 refers to no “unacceptable” impact on heritage significance.	“iv. That there are no <u>significant</u> adverse impacts on the significance of heritage assets (including the contribution to that significance made by their setting)”
54	Policy CN6: Micro Energy Generation Schemes	Sound		
55	Policy CN7: Energy Storage	Sound		
77 / 78	Strategic Policy D1High Quality, Well Designed and Inclusive Places	Sound		



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92	Strategic Policy D2: Design Principles for Winchester Town	Sound		
94	Strategic Policy D3: Design Principles for the South Hampshire Urban Areas	Sound		
95	Strategic Policy D4: Design Principles for Market Towns and Rural Villages	Sound		
99 / 100	Strategic Policy D5: Masterplans	Sound		
107	Policy D9: Shopfronts	Sound		
110	Policy D10: Signage	Sound		
134	Biodiversity and the natural environment Key issue: iv	Comment	We encourage explicit acknowledgement that the natural and historic environment are integral to each other. We suggest amending key issue iv in this regard	"The Local Plan helps to ensure that the landscape and natural environment of the district which is valued so highly is protected and enhanced. <u>The complex interplay between landscape, the natural environment, historic features and cultural connections</u> means that an integrated approach to their management is recommended."



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136	Strategic Policy NE1: Protecting and enhancing Biodiversity and the Natural Environment in the district	Sound		
142	Paragraph 7.32	Comment	The text could usefully acknowledge the role of Scheduled Monuments and Registered Battlefields in the context of green infrastructure.	"Historic parks, <u>Scheduled Monuments</u> , <u>Registered Battlefields</u> and landscape features such as park pales, veteran trees, and sunken lanes; and"
143	Paragraph 7.34	Comment	Might reference be made to features of heritage significance? We believe this would be appropriate and enrich the text.	"Well-planned green infrastructure should be incorporated into development proposals integrating and building upon the existing green network. It should contribute to high quality development and economic prosperity by making places attractive to residents and businesses and improving the health and well-being of the local and wider community. It should respect and respond to local landscape character, <u>including features of heritage significance</u> , and integrate with sustainable transport and green tourism initiatives, expanding upon existing provision."
144	Policy NE4: Green and Blue Infrastructure	Sound		
152	Suggested new paragraph	Comment	We suggest the Council consider adding a new supporting paragraph on the relationship between flooding and heritage in support of the second paragraph on page 156. We would be happy to confer if needed and consider this to be a minor modification.	
155 / 156	Policy NE6 Flooding, Flood Risk and the Water Environment	Sound		



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162	Policy NE9: Landscape Character	Sound		
173	Policy NE14: Rural Character	Sound		
175	Policy NE15: Special Trees, Important Hedgerows and Ancient Woodlands	Sound		
183	Paragraph 8.4	Comment	I suggest referring to Registered Parks and Gardens to distinguish from those historic parks that are locally listed.	“Currently there are 110 Scheduled Monuments, 2,271 listed buildings, 11 historic <u>Registered</u> parks and gardens, 37 Conservation Areas and a historic battlefield at Cheriton, which fall within the Winchester district.”
184	Strategic Policy HE1: Historic Environment	Sound		
185 / 186	Policy HE2: All Heritage Assets (both designated & non-designated)	Comment	<p>I am not sure that the final clause of the first paragraph is needed i.e. “(the results from which needs to be submitted in a Heritage Statement)”. When the following paragraph refers to the need for a Heritage Statement, reference to a Heritage Statement in the prior paragraph feels a bit repetitive.</p> <p>While reference to heritage at risk in the final section of the policy is welcome, I suggest making a minor modification to clarify what is meant by “proposals for heritage assets”.</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 assessment, including a 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).”</p> <p>“Any proposals <u>directly affecting buildings and other structures for heritage assets</u> 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.”</p>



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			<p>We note the national Register currently includes several conservation areas, which are unlikely to be removed from the register under the circumstances outlined. The national Register also includes Scheduled Monuments, where the main risk is from arable ploughing, and where a broader approach is needed (often linked with land use). The core focus for this policy intent, we infer, is buildings and other structures.</p> <p>Also, we query the final phrase relating to removal of the asset from those registers. This is admirable but may not always be practicable.</p>	
187	Policy HE3: Designated Heritage Assets	Sound		
188	Policy HE4: Non-designated Heritage Assets	Sound		
189	Policy HE5: Protecting the Significance of Heritage Assets (designated and non-designated heritage assets)	Sound		



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	and Mitigating Unavoidable Harm			
190	Policy HE6: Scheduled Monuments and Nationally Important Non-designated Assets	Unsound / object	<p>We object to this policy principally because it could be read as putting minimisation of harm on a par with avoidance. For these nationally important archaeological assets, a sound approach aligning with national policy needs to underscore that avoiding harm (which tends to involve preservation in situ) is the preferred option. To bring this to the fore, we advise moving the final line to the start of the policy and splitting avoidance and minimisation into separate actions.</p> <p>Also, we recommend being clear in the title of the policy and its main text that reference to non-designated heritage assets (NDHA) are those with <u>archaeological</u> interest, rather than any NHDA.</p> <p>Finally, while we welcome reference to making contact with Historic England, for completeness this should cover the scenario where proposals may affect Scheduled Monuments and our view is sought on how to proceed.</p>	<p>Policy HE6 Scheduled Monuments and Nationally Important Non-designated <u>Archaeological Assets</u></p> <p><u>Proposals should take a positive approach to archaeology, by avoiding locating development on sensitive areas and designing development that responds positively to the significance of archaeological features, including their settings.</u></p> <p>Applications for planning permission which affect, or may affect a scheduled monument, or its setting, should be supported by appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. <u>Where harm is unavoidable, proposals should explain the reasons why and outline steps to minimise harm.</u></p> <p>Historic England should be notified where a Scheduled Monument Consent (SMC) is required in addition to planning permission <u>and/or if the proposals may affect a Scheduled Monument and/or its setting.</u></p> <p>Applications which affect, or may affect, a non-designated heritage <u>archaeological</u> asset that is potentially of national importance will be required to provide appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm.</p> <p>The Winchester City Council Archaeological Advisor / Archaeologist should be consulted on proposals that have the potential to affect either type of asset to determine what evidence would be required.</p>



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				Applications will be determined also in accordance with Policy HE3 on designated heritage assets. Additionally, proposals should take a positive approach to archaeology, by avoiding locating development on sensitive areas and designing development that responds positively to the significance of archaeological features, including their settings.
192	Policy HE7: Non-designated Archaeological Assets	Comment	We are not convinced that the first paragraph is needed (not least because it does not make clearer when the policy applies) and could be deleted. Note the final paragraph is repeated.	
194	Policy HE8: Applications Affecting Listed Buildings	Sound		
196	Policy HE9: Changes of Use to Listed Buildings	Sound		
199	Policy HE10: Development in Conservation Areas	Sound		
200	Policy HE11: Demolition in Conservation Areas	Comment	Criterion i includes an unwanted comma after “significance”.	
202	Policy HE12: Registered Historic Parks and Gardens	Unsound / object	The current wording seems to imply that RPGs are on a local register, which could imply there are only of local significance.	Policy HE12 Registered Historic Parks and Gardens



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			<p>This needs to be corrected. We suggest one way this might be achieved.</p> <p>Also, we believe the policy should be headed “Historic Parks and Gardens” to acknowledge that the policy covers more than Registered Parks and Gardens. Deleting “historic” in “Registered Historic Park and Garden” may also help to tighten this clarity.</p>	<p>“Proposals which accord with the Development Plan will be permitted provided they do not result in unacceptable harm to or loss of the significance or distinctive character of a Registered Historic Park and Garden or a Park and Garden identified on Local Registers (including the Hampshire Gardens Trust Register of Parks, Gardens and Green Spaces) or results in the loss or deterioration of associated designated heritage assets (in accordance with policy HE3).”</p>
205	Policy HE13: Non-designated Historic Rural and Industrial Heritage Assets	Sound		
209	Policy HE14: Improvements or Alterations to Improve the Energy Efficiency of Historic Assets	Unsound / object	<p>Aside from the typo in “alternations”, we believe criterion i merits editing to clarify the importance of understanding how the building was intended to function. We welcome the Council’s guidance document to making your historic building more energy efficient. The current wording of this policy does not fully align with this approach and thus undermines its effectiveness.</p>	<p>“Any improvements or alternations that are designed to improve the energy efficiency of designated and non-designated historic assets will be supported providing that it can be clearly demonstrated that:</p> <p>i. The proposals represent an appropriate strategy for the individual historic building, based on <u>a whole building approach that takes account of the building’s fabric and location, as well as the needs of its occupants. Proposals should conserve or enhance key features of special interest where possible, and minimise and justify unavoidable harm</u> an appropriate assessment and they meet the requirements of the NPPF in terms of assessing the significance of harm to the heritage asset; and</p> <p>...”</p>



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240	Policy H10: Houses in Multiple Occupation (HMOs)	Comment	Might the policy usefully refer to the heritage significance of the building as a consideration?	“Would not be detrimental to the amenities of nearby residents, or the overall character and amenity of the surrounding area <u>or the heritage significance of the building;</u> ”
243 / 244	Policy H11: Housing for Essential Rural Workers	Comment		“The design of the dwelling should reflect local distinctiveness and the rural character of its surroundings, while avoiding or mitigating adverse effects on the natural <u>or historic</u> environment and biodiversity.”
247 / 248	Policy H12: Provision for Gypsies, Travellers and Travelling Showpeople	Comment	Given setting contributes to significance, technically this should not be an either / or scenario.	“Sites and the layout proposed should avoid harm to the significance (<u>including the setting</u>) of heritage assets or biodiversity interests;”
261	Subsection on “Culture, creative and visitor economy”	Comment	I would have expected to see reference to the historic environment in these paragraphs, especially in Winchester. Might a suitable reference be added? We note this is picked up later in paragraph 10.75.	
311 / 312	Policy W1: Barton Farm Major Development Area	Sound		
320 - 322	Policy W2: Sir John Moore Barracks	Comment	Broadly we find the policy to be sound. That said, given the supporting text does not refer to the Scheduled Monument, we suggest either adding a line to the supporting text detailing the significance of the Round Barrows referenced in policy, or ensure it is clear in the policy that the Barrows are Scheduled Monuments. Also, we note two typos.	“The proposals record features of heritage significance and incorporates them where feasible into any re-development of the site as part of a wider heritage trail that celebrates the site’s military history and helps the general public to understand and appreciate how the site has evolved. The proposals will also need to minimise harm to the setting of the adjacent <u>Scheduled</u> Round Barrows;”



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324	Paragraph 12.37	Comment	We recommend adding reference to key sources of information that would assist an applicant to respond sensitively to the character of the conservation area. We exemplify what we mean in revised wording. The Conservation Area Appraisal identifies the car park as a negative contributor to the conservation area and supports the case for its redevelopment.	“Any proposals will need to be designed in a sensitive manner as the southern part of the site is located within Winchester Conservation Area. <u>Relevant references include (but are not limited to) the Conservation Area Appraisal and Winchester Townscape Assessment.</u> ”
325 / 326	Policy W3: St Peter’s Car Park	Comment	We welcome amendments to the policy following Regulation 18 and recommend a minor modification to the policy, to refer to setting of listed buildings in criterion iii.	“As part of the design process, proposals should assess the overall height of the proposed development and the impact on the character of the Conservation Area and the <u>setting of Listed Buildings;</u> ”
334 - 336	Policy W5: Bushfield Camp	Comment	I believe there to be a missing apostrophe and potentially “incorporates” should be “incorporate”. That said, overall, we believe this to be a sound policy.	“The proposals retain features of heritage significance and incorporates them into any redevelopment of the site as part of a wider heritage trail that celebrates the site’s military history and place of enjoyment by the general public to understand and appreciate how the site has evolved;”
343 / 344	Policy W7: Central Winchester Regeneration	Sound		
346	Paragraph 12.78	Comment	To avoid confusion, we suggest simplifying reference to this designated heritage asset.	“...and have special regard to the setting of the Hampshire Archives and Local Studies Offices and its garden, which is a Grade II listed building have been included on the List of Buildings of Special Architectural or Historic Interest at grade II. ”
349 / 350	Policy W8: Station Approach Regeneration Area	Comment	We believe that criterion vi should be deleted, noting it feels unfinished and the content of what is currently criterion vii. Also, criterion iv includes a minor typo.	“iv. The proposals makes a positive contribution towards improving the area as a key entrance to the town centre, enhancing the public realm, enabling people to walk and cycle for most everyday trips and improving those links to the railway station, the surrounding area and other key destinations;



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				<p>v. The proposals include a high standard of architectural design and use quality materials and detailing, through the creation of a design response that will deliver innovative, sustainable new buildings, creating and providing high quality public spaces and improvements to the public realm;</p> <p>vi. The proposals assess the impact of buildings heights on views and adjoining areas unless a taller building can be justified in townscape terms. Taller buildings are unlikely to be acceptable in close proximity to nearby residential properties;</p> <p>vii. The proposals retain views of the treed skyline and other key historic features such as Winchester Cathedral and assess the impact of buildings over 3 storeys on views and adjoining areas and do not exceed 4-5 storeys in height, unless a taller building can be justified in townscape terms. Taller buildings are unlikely to be acceptable in close proximity to nearby residential properties;”</p>
354	Policy W9: Bar End Depot	Sound		
356	Paragraph 12.106	Comment	In referring to the survival of archaeological remains, we suggest being clearer that the reference in this paragraph relates to what is known about above-ground remains.	“...Hyde Gateway, which is located opposite St Bartholomew`s Church in King Alfred`s Place, and the Bridge is a Scheduled Monument, and Listed Building. The Bridge is also a Listed Building and a Scheduled Monument. These are the only substantial <u>above ground / upstanding</u> remains that exist.”
359 / 360	Policy W10: Former River Park Leisure Centre site	Sound		
362	Paragraph 12.120	Comment	We suggest adding reference to the Winchester Conservation Area Appraisal, which includes helpful guidance on the hospital, including the potential for enhancement “if the opportunity arose” for its redevelopment (see page 58).	



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363	Policy W11: University of Winchester / Royal Hampshire County Hospital	Sound		
384	Policy W16: Botley Bypass	Comment	We recommend referring to the Botley Conservation Area in the supporting text, including its technical assessment, which refers to the importance of colours, materials, trees and proposed landscape treatment. The heritage significance of this area should be acknowledged.	
399 / 400	Policy BW3: Tollgate Sawmill	Sound		
403 / 404	Policy BW4: Land north of Rareridge Lane	Sound		
407 / 408	Supporting text for NA1: The Dean	Comment	Given the site's proximity to the conservation area, might the supporting text usefully refer to the New Arlesford Conservation Area Technical Assessment, acknowledging the potential to impact on the western approach into the town?	
426	Policy CC2: Colden Common Farm	Comment	We note the Heritage Topic Paper states that the capacity of the site for sensitive development is an "absolute maximum" of 45 dwellings. But the policy refers to "about 45 dwellings". Surely the policy should refer to "up to 45 dwellings" or "no more than"?	"Land at Colden Common Farm, as shown on the Policies Map, is allocated for no more than about 45 dwellings. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:"
430	Policy CC3: Land at Main Road	Sound		



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433	Policy CC4: Land adjoining 85 Church Lane	Sound		
442	Paragraph 14.90	Comment	Might reference be usefully made to the Kings Worthy Conservation Area Technical Assessment?	
444	Paragraph 14.95	Comment	Might reference be usefully made to the Kings Worthy Conservation Area Technical Assessment? Also, reference is made to “harmful impact on these” when perhaps it would be clearer to state “harmful impact on their setting”?	
445 / 446	Policy KW2 Land adjoining the Cart & Horses PH	Sound		
466 - 468	Paragraph 14.126	Comment	Records indicate a Roman road runs through the site. While we welcome the policy provision for archaeological investigation, explicit reference should be made to the Roman road and associated settlement activity, and the approach taken.	“14.126 The nearby site at The Glebe contained to the north west significant archaeological remains. Further archaeological evaluation of the site will be needed prior to development to ascertain the full nature of the archaeological resource within the site. <u>Records indicate that a Roman road runs through the site and Roman settlement activity has been identified in the immediate vicinity. Should archaeological investigation indicate good survival, the site development should be informed by and sensitive to any such remains, as they could be categorised as a non-designated heritage asset and, potentially, nationally important”.</u>
482	Policy OT01: Land east of Main Road	Unsound / object	In common with our comment on paragraph 14.126, this site intersects with a Roman road. The policy is currently silent on this matter. We recommend the Council take an approach similar to that taken for WK6 on archaeological investigation and appropriate supporting text.	
495 / 496	Policy SU01: Land at Brightlands	Comment	While we support the policy approach, it would be prudent to consider the possibility that remains of national importance may be uncovered. Set in that context, we note reference in supporting text to “issues” may include the potential for Scheduling, as the Council may be aware.	



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