



Historic England

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Cllr David Short  
Ashwell Neighbourhood Plan Working Group  
59 High Street  
Ashwell

Direct Dial: 01223 582747

Our ref: PL00525577  
24 January 2019

Dear Cllr Short

### **Ref: Ashwell Neighbourhood Plan Regulation 14 Consultation**

Thank you for consulting Historic England on the proposed Neighbourhood Plan for Ashwell. 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 are therefore pleased to have the opportunity to comment on your neighbourhood plan area at this stage.

### **Comments**

Paragraph 185 of the National Planning Policy Framework (2018) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

We welcome the identification of the village's history, character and rural setting in the Vision and Objectives. We welcome criteria 6 - 8 for identifying and assessing sites for housing development. However, we would pick up that criterion 8 does not consider key views within Ashwell and refers to Figure 3 rather than Figure 6, which does include views within Ashwell.

As a general point, the policies within the document are framed as considerations rather than formal policies. The precise wording should be reviewed to provide clarity, in line with the requirements of National Planning Policy Framework paragraph 16, d). The Plan also identifies sites with potential for housing development. It is not clear whether these are formal site allocations as they fall outside the settlement boundary for Ashwell in the emerging local plan. This needs to be clarified, and the appropriate processes followed.

### **Sites**



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Historic England has concerns about two of the three areas identified for housing development. Site two is adjacent to grade II The Orchard (41 West End) and opposite grade II 39 West End. The policy and supporting text only considers any harm to 41 West End and should also include 39 West End. The policy also does not seek to avoid harm first before seeing where harm can be mitigated. If a site assessment has identified appropriate mitigation measures, these could be incorporated into your policy. The test for assessing harm against public benefit differs as to whether it is substantial or less than substantial harm. For substantial harm the public benefit has to outweigh the harm or loss; for less than substantial harm the public benefits have to be weighed against the harm or loss. These are different tests to balancing harm against public benefit. Please see section 16 of the NPPF for the appropriate wording.

The access to site three appears to be the access beside grade II Woodlands and its attached barns. This access is opposite two further grade II listed buildings - The Old Cottage and 1 & 3 West End. The northern most boundary of the site comes close to the grade II registered park and garden of Ashwell Bury. It abuts the conservation area boundary to the south and is close to the boundary to the north. The proposed site also impacts on identified key views out of the conservation area 6 and 9. None of these points are picked up in the supporting text or policy of site 3.

Whether or not Site 3 is a formal site allocation, it is not clear what consideration there has been of alternative sites and whether an assessment of heritage impacts has been carried out. If this site is carried forward within the Plan a heritage impact assessment should be undertaken to define an appropriate site boundary and identify appropriate avoidance and mitigation measures. These should be incorporated into the policy and not left to a developer masterplan.

The development of these two sites would potentially have significant effects on the historic environment, and we would note, therefore, that a Strategic Environmental Assessment may need to be carried out for this plan, if it has not already been. Please see our guidance on this process, linked to below.

## Design

The NPPF (paragraphs 124 - 127) emphasises also the importance placed by the government on good design, and this section of the NPPF sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area. The policies of neighbourhood plans should also ensure that developments in the area, especially if you are considering allocating sites for development, establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.



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We welcome, therefore, the incorporation of the principal recommendations of the Village Design Statement into the text of the neighbourhood plan, but note that the way in which this is done will need reordering to ensure due weight is indeed given to them.

Policy 2.a is a good example of where a policy could be clearer. Does it actually mean: *“Applicants should consider design issues and set out how the key components of the Ashwell Village Design Statement have been addressed when submitting planning applications.”*? If so, should this policy be redrafted to include some of the more detailed considerations you go on to make in the supporting text.

We welcome the detail on the settlement pattern of the village and how the character of the village varies. It is unclear, however, whether the bullet points in this section, in the same colour text as the policy wording, are meant to be policy or supporting text. The same comments apply to the following sections on street pattern, buildings, walls, roofs, door and porches, and windows.

We suggest also that it may be useful in bullet point three under windows to define what you mean by “older buildings.”

## **Natural Environment**

We welcome the identification of Totternhoe Clunch. Clunch is a common building material in older buildings across Hertfordshire, Cambridgeshire and Bedfordshire. It is now a scarce building material as it isn't widely quarried, so it would be useful to see this reflected in the Historic Environment section of the Plan.

## **Historic Environment**

This is a comprehensive look at Ashwell's historic environment, particularly through linking the buildings and the village's development with their landscape. We welcome the commitment in policy 7.h. to create a list of non-designated heritage assets. This list should be embedded as a planning consideration through a policy within the Plan, as the Village Design Statement has been. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

We welcome the commitment to improve the conservation of Arbury Banks scheduled monument, however, it would be helpful if the policy and/or supporting text set out why this policy is necessary.

## **Evidence base**



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We note your list of evidence base documents but have been unable to find them to review, where relevant, alongside the Plan. We also notice that there is no evidence base document on the historic environment, nor one on site selection. As highlighted earlier, these will be necessary to demonstrate that the sites you have identified are appropriate sites for development, and that your policies with regard to the historic environment are sound.

### Other recommendations

Your neighbourhood plan is an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. An example could be the village recreation ground. Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces>.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid> .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. Although we note that North Hertfordshire District Council does not presently implement CIL, if it chooses to do so in the future the Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, you can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. An example could be improved heritage interpretation and conservation at Arbury Banks. More information and guidance on this is available from Locality, here:





<https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

### Further advice

Information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to ensure that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

The recently published Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment available to download also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>.

Useful advice on the appropriate formulation of planning policies for neighbourhood plans has been produced by Locality, which is available at the following link, and which you may find helpful also: <https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>

In addition to the Historic England advice linked to above, the following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets:

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>





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Owing to the fact you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, you may need to undertake a Strategic Environmental Assessment. We would recommend you review the following two advice documents, which may be of use:

HE Advice Note 3 - site allocations in local plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

### Conclusion

We hope you find these comments useful in developing your Plan. It may be useful to consider our comments with reference to the Basic Conditions that neighbourhood plans are required to meet. These are set out in the Government's Planning Practice Guidance here: <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

Please do not hesitate to contact us if you would like to discuss any of our comments further.

Yours sincerely,

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