



Historic England

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by email only

Our ref: 2017.07.31
Your ref: Plumpton NP
Pre-
submission
RLS
Comments
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To whom it may concern:

Plumpton Neighbourhood Plan Pre-submission version

Thank you for consulting Historic England on the pre-submission version of the Plumpton Neighbourhood Plan. Historic England are the government's advisors on planning for the historic environment including the conservation of heritage assets and championing good design in historic locations. As such we have focused our comments on those areas of relevance to us.

Policy 7.1 Riddens Lane, Plumpton Green

The site assessment identifies that the site is located within an archaeological notification area – an area that either has known archaeological heritage assets of with a high potential for the presence of previously unidentified heritage assets. It isn't clear from the site assessment how any potential harm to the significance of these heritage assets that might result from the proposed development has been taken into account in allocating the site, or what measures have been taken to minimise or avoid any harm. The supporting text to the policy suggests that recent investigations have provided up to date evidence on the presence of archaeological remains. The NPPF states that a purpose of all planning should be to conserve heritage assets in a manner appropriate to their significance. To consider that the plan promotes sustainable development we need to see more information both on what the archaeological remains that could be affected by this development are and how the need to conserve them in a manner appropriate to their significance has been taken into account in the choice of sites for development.

The NPPF also requires councils to ensure that applicants present evidence of the significance of any heritage assets that could be affected by development and the nature of the impacts that would result. We agree with the statement at 5.41 of the plan that further research should be expected before a decision on a planning application could be made, this is required to reduce or mitigate potential harm to

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these heritage assets. However, in our advice note on site allocations (HEAN3) we point out that the most appropriate place to identify any mitigation measures considered necessary to justify the allocation of a site is within the policy itself to ensure they are implemented. If, having reviewed the archaeological evidence and the potential harm to any heritage assets that may be present, the steering group still feel this site is appropriate for development we would recommend including a clearly worded requirement for archaeological investigation to be undertaken to inform the design of any proposal. This will be important in avoiding or minimising harm and ensure any remains of national importance are preserved ‘in-situ’.

The recently ‘made’ Haywards Heath Neighbourhood Plan Policy H2 provides a useful model for such a policy requirement, which has been tested through examination:

“Be informed by archaeological investigation undertaken according to a written scheme of investigation agreed in writing with the District Council’s archaeological advisor and will seek to retain archaeological remains, and particularly those of national importance, in-situ. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present a suitable programme of recording and publication of those remains will be required.”

Given the known potential impact of development of this site in particular this element is justified in addition to the more general requirement for archaeological desk-based assessment set out in Policy 7.

Policy 7.3 The Glebe.

We note the concern expressed at 5.57 that development of this site should not result in the demolition of the Rectory, as well as the requirement to include a landscape buffer between new housing and the existing residential properties. We have been approached by a member of the public who is keen to ensure that the historic interest of the grouping of the church, rectory and earlier Strollings House and the contribution these buildings and their historic and architectural interest make to the character and sense of place of the village centre is sustained. We have also received applications for the listing of each of these buildings. We will consider how to take these applications forward in due course and subject to our priorities and resources.

Notwithstanding their eligibility or otherwise for national designation it appears that each of these buildings has a historic, architectural or artistic interest that merits consideration in planning – as suggested by the desire to prevent harm to the rectory and church buildings in particular. This suggests that they should be considered as non-designated heritage assets within the government’s definition set out in annex 2 of the NPPF.

Have the steering group given consideration to the potential for these buildings to be classed as heritage assets? If so, has their significance been taken into consideration



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in assessing the suitability of this site for development, particularly where it might create pressure for the demolition (total loss) of one of them? Or harmful impacts to the setting of all three. Clearly identifying those features of the site and its surroundings that the community agree are non-designated heritage assets and requiring proposals seek to conserve them or positive features of their settings (as appropriate) within the allocation policy, provides a robust approach to conserving their value and would be considered an important element of the sustainable development of this site. To this end it may also be worth considering whether any part of the Rectory garden should be more clearly excluded from the allocation to provide the 'buffer' that is considered desirable to protect the amenity and (in our view) historic setting of the adjacent properties.

The site has limited potential for access that would not affect the setting of the Rectory. We would like to recommend the steering group give further consideration to how the access to the site can be achieved and how any harm to the setting of heritage assets could be minimised or avoided to ensure that proposals will constitute sustainable development. One option would be to require that development proposals clearly set out how measures to sustain and, where practical, enhance the setting of heritage assets has informed the design of access arrangement, although how the community expect this to be achieved might be set out through clearer design guidance.

Policy 7.4 Land at Rear of Oakfield

We note that the site lies adjacent to an Archaeological Notification Area that does not appear to have been considered in the site assessment document. Whilst ANAs may represent a well-defined area of archaeological interest, in many cases it is possible that related remains may be found in the surrounding area. Without knowing for what reason the area has been identified as an ANA it is difficult to make a judgement about whether allocation of this site could have potential harmful impacts to archaeological remains. We would expect this to be explored in the Site Assessment Document, as well as the SEA.

We recognise that Policy 7 provides some requirement to explore the archaeological potential of the site. However, to ensure that any development proposal is guided to include consideration for potential archaeological impacts we recommend that the proximity of the archaeological notification area to the site is noted in the supporting text and a requirement for proposals to be informed by archaeological investigation secured within policy 7 if necessary. Yours faithfully

We hope these comments are of assistance to the neighbourhood plan steering group. Nevertheless, please don't hesitate to contact me if there are any queries that arise from them or if you would like any further information.

Yours sincerely



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