

Built Heritage Matters

Representations to Henfield Neighbourhood Plan 2017-2031 under The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

December 2019

Henfield Parish Council Henfield Neighbourhood Plan, Submission Plan (22 October 2019)

1. Paragraph 1.5 – reference to National Planning Policy Framework 2018. This statement is outdated and should instead be in conformity with the latest NPPF update from February 2019
2. Section 4 / Objectives – with regard to the Environment (and built heritage matters) the Objective is set out as:

“To ensure the historical and cultural character of the village, green space and surrounding landscape is valued, enhanced, and promoted and is an attractive place for communities, business and for welcoming additional visitors. (Policies 9, 10.1, 11).”
3. This generally accords with paragraph 185 of the NPPF which states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment ...” and also advises that “This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; [etc.] ...”
4. Arguably, however, it could be said that the use of the terms “to ensure” and “valued, enhanced, and promoted” as part of this criterion sets too high a bar in relation to the protection of the historic environment, rather than finding the right balance between often competing considerations in looking to achieve sustainable development in accordance with the objectives of the NPPF. The desirability of the conservation of heritage assets, and of sustaining and enhancing their significance, is a key theme of national policy as set out in paragraph 184 and 192 of the NPPF, respectively. Annex 2 (Glossary) of the NPPF defines “Conservation (for heritage policy): [as] The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.” For example, an apparent emphasis on enhancing rather than sustaining heritage significance could be overstating the requirements of national policy, and also the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990.
5. Section 5 / Policies – there is no specific reference to built heritage assets in Policy 1: A Spatial Plan for the Parish or its criteria. However, with regard to identifying potential preferable sites for future development, paragraph 5.13 establishes that “The chosen option

(Option 5) was considered to be an appropriate strategy to deliver the housing numbers for the Plan period to 2031 when judged against reasonable alternatives”.

6. SA/SEA Site F: Land south of Chanctonbury View, Henfield is identified as the appeal site.
7. Page 25 - Policy 2: Housing Site Allocations, identifies four preferred sites for future development (each of which have previously been considered as part of the earlier SA/SEA process). These are:
 - Site a (Policy 2.1) that is equivalent to SA/SEA Site X & Xa
 - Site b (Policy 2.2) that is equivalent to SA/SEA Site C
 - Site c (Policy 2.3) that is equivalent to SA/SEA Site L & La
 - Site d (Policy 2.4) that is equivalent to SA/SEA Site I
8. For Site c, it is set out that:

“P2.3.1 Land west of Backsettown, off Furners Lane, Henfield is allocated for approximately 30 single storey dwellings, provided the proposal design demonstrates adherence to all of the following principles: ...

b. The proposal preserves the setting of the Backsettown House, the listed building to the east ...”
9. For Site d, it is set out that:

“P2.4.1 Land south of the Bowls Club, off Furners Mead, Henfield is allocated for approximately 10 single storey dwellings, provided the proposal design demonstrates adherence to all of the following principles: ...

b. The proposal conserves and enhances the historic significance of the setting of the Henfield Conservation Area, in particular the proposal must preserve the nearby listed building and its setting. This will include a green buffer zone in the south west part of the site ...”
10. Our criticism of the develop-ability of these sites (L & La and I) (in terms of built heritage constraints) relative to other sites in the SA/SEA is set out below under heading - ENPLAN Henfield Neighbourhood Plan, Sustainability Appraisal inc SEA (6 June 2019)
11. Page 66 - Policy 12 Design Standards for New Development, states that:

“P12.1 Development proposals will be supported provided that the design details meet the requirements within the adopted Henfield Parish Design Statement attached as an Appendix to the HNP; and in particular, where appropriate to the site, the proposal design complies with all of the following:- ...

c. The scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, are of a high quality and reflect the architectural and historic character and the scale of the surrounding buildings and street-scene / landscape.

d. The design preserves or enhances the character or appearance of the Henfield Conservation Area and/or preserves any adjacent listed buildings and its setting.”

12. For our response to mentioned supporting design guidance refer to below under heading - Henfield Parish Council Henfield Parish Design Statement (Revised 2019).
13. Under criterion c, these general design principles would broadly reflect national policy requirements for heritage assets in our view.
14. Paragraph 5.91 – with regard to Community Aim 6 it is set out that “... This policy supplements the high quality demands in HDC’s Strategic Policy 32: The Quality of New Development.” This is important as the Neighbourhood Plan should be in accordance with the Development Plan. Related to this, we contend that more explicit reference to HDC Planning Framework (HDPF) 2015 Policy 34 (Cultural and Heritage Assets) should appear within this section.

Henfield Parish Council Henfield Neighbourhood Plan Site Assessment (October 2019)

15. Page 38 onwards – with regard to Site F – Land south of Chanctonbury View, Henfield, the “constraints and potential mitigation” is set out, which is a word for word, albeit edited, repeat of the Inspector’s appeal decision. Unhelpfully, this provides no further constructive analysis of the planning constraints to development and also how these could be mitigated.
16. As to the “Summary of Sustainability Appraisal” for Site F it is also set out that:

“A westward facing sloped greenfield site proposed for housing. Potential impact on setting of the Henfield Conservation Area as well as a number of listed buildings not far from the eastern boundary. This site would provide a positive contribution towards the provision of housing and helping Henfield remain a ‘hub’. As such it would have strong positive impacts on Objective’s 3 and 4. However, it would have a negative landscape and heritage impact. Impacts in the landscape and heritage would be lessened should the lower westward end of the site come forward with the higher eastern end remaining as open space.”
17. The last sentence sets out that some such impacts could not be completely avoided through a new quantum / approach to development on site, the magnitude of adverse / harmful impacts could be reduced prior to the wider planning balance with opposing potential public benefits.
18. It is helpful to compare this with the SA/SEA analysis of the other sites Site L and Site La. The client is now promoting a less intense residential development of Site F. It should be noted that Option 6 within the SE/SEA has already considered the potential delivery of Site F with a different quantum of 30 resi units. In addition, a new approach to the development of this site should reasonably lower its sensitivity to future development in built heritage terms, and so could also improve its ranking / preference relative to the other alternative sites assessed.

ENPLAN Henfield Neighbourhood Plan, Sustainability Appraisal inc SEA (6 June 2019)

19. Section 4.0 (page 21) - SA/SEA Objective 8 “To safeguard and enhance the character and built heritage within the parish”. This does not accord fully with the relevant statutory duties (Planning Act) and or national policy (NPPF) that requires special interest / setting to be preserved for listed buildings, preservation or enhancement of character or appearance for

conservation areas, and all designated heritage assets to be conserved; their significance sustained or where appropriate enhanced. There is no specific duty or policy requirement to safeguard (read preserve) and enhance in heritage terms.

20. Section 5.0 (page 32) – Potential housing site Site F Land south of Chanctonbury View, Henfield is scored overall as “Amber”, which is defined as “overall the site may have slightly negative impacts on the objectives”, but this does not have regard to any mitigation.
21. With regard to Objective 8 (Character & Heritage) specifically, Site F is scored as a “red minus”, which is defined as “greater negative impact on the sustainability objective”.
22. Importantly, the Summary text for Site F acknowledges that “impacts in the landscape and heritage could be lessened should the lower westward end of the site come forward with the higher eastern end remaining as open space”. The current promotion of the site is now for a reduced quantum of development located at the lower westward end of the site, with the eastern part retained as open, landscaped space. This approach ensures that the magnitude of landscape and heritage impacts are reduced significantly.
23. In terms of other assessed sites we can comment as follows:
24. Site I – the score of this greenfield site on Objective 8 as “amber question minus” is challenged as indicating too low a sensitivity in heritage terms to built development. Relative to the 42 residential unit allocating being tested for Site F, which is scored as a “red minus”, this other site also is similarly located near to the edge of the conservation area and as part of its immediate landscape setting (related to the historic Henfield Common) and also part of the setting of a vernacular listed building. Therefore comparably sensitive to development. This suggest an inconsistent approach to the assessment work.
25. Site L – in my view reasonably scores “red minus” on Objective 8, in light of likely harmful impact on a large part of the immediate setting of a listed building farmhouse at the village edge. “Site La” however only scores “amber question minus”, whereas these sites are the same with the only difference that Site La restricts its built area to the western part of the site. In this regard, Site F is now being promoted for a lower number of units concentrated to the lower western area of the site only, and as such the degree of heritage constraint should similarly be reduced and its score for this objective improved – recommended as “amber question minus”.
26. Site R – site adjoining Site F to its west, and east of the Downs Link (former railway line). Arguably the score of this other greenfield site as “none” or “no impact” is challenged as indicating no sensitivity in heritage terms to built development. Although it is acknowledged that this site is more distant from the conservation area (and also not near to any listed buildings), as part of the landscape area and valued wider countryside setting at the edge of the settlement shared with Site F this site could reasonably be considered to have at least a score of “amber question minus” on Objective 8, on the basis of Site F’s current scoring. It is also noted that Site U, adjoining and across the Downs Link to the west of this site, scores a “red minus” due to its considered high sensitivity in heritage terms, which again appears inconsistent to a score of “no impact” for Site R.
27. 5.34 - Again, it should be noted that all these site assessments do “not taking into account any mitigation that may be required”. Sensibly this is repeated at 5.70 – “Possible mitigation

has been identified for all options that would go some way to reducing the negative impacts further and as a result all options are ones which could be considered. However, it is noted that a three pronged approach should be adopted when considering harmful impacts (avoid, reduce, then offset) and therefore negative impacts should be avoided in the first instance if at all possible." This is a key caveat for all the findings of this document, and highlights the value that further mitigation strategies (such as reinforced boundary planting) could have in supporting the promotion of this site at later application stage.

28. Paragraph 5.36 onwards - with regard to combined site options for new housing. Option 1 includes Site F, although the text summary does not refer to this site specifically. It is stated that "accordingly, negative impacts should be expected" for this option. This option has a score of "amber question minus" on Objective 8.
29. Option 6 also includes Site F, although at a different quantum of 30 resi units, and states that "the topography of the site may have landscape impact on the wider countryside but this could be lessened through careful design and landscape mitigation". This option again has a score of "amber question minus" on Objective 8 – stating in summary text that "the spread of impacts around the settlement give rise to possible/slight negative impacts on a number of objectives including heritage with negative impacts on the countryside. Site Q, F and I should all have regard to localised heritage assets in the vicinity." With regard to Possible Mitigation, these measures are recommended as:

"1. Existing boundaries to be retained and enhanced around the boundary of Site Q, F and Xa to ensure a new edge of the settlement is strengthened. Improve connectivity to main services in the village.

2. Regard should be given to the setting of localized heritage assets which impact on a number of sites in this option. Protection of the setting of heritage assets may inform the quantum of development to come forward."

30. Again, this highlights the value that mitigation strategies (such as reinforced boundary planting) could have in supporting the promotion of this site at later application stage
31. Note at all options considered score "amber question minus" on Objective 8 as part of this assessment, perhaps indicating little or only a modest differentiation between them in terms of heritage constraints.
32. 7.3 – describes that option 5 (not including Site F) was selected as the preferred option even though "some of these options did score more favourably against the sustainability objectives than option 5" and that "overall however, it is recognised that within the context of the Horsham District Planning Framework, Henfield is defined as a larger village and is a relatively sustainable location for development. These differences in the sustainability of the different options are therefore overall considered to be marginal, and it is considered that negative impacts can be offset through a range of avoidance, reduction and mitigation measures. Overall therefore it is considered any of the options (subject to mitigation which would be expected through planning policies, conditions and so on) would contribute to achieving sustainable development." This acknowledgement in this document that all options could comply with the wider objectives of the NPPF confirms that any allocation of Site F (individually or as part of a combined option for housing delivery) would accord with planning policies and NPPF objectives.

33. Section 6.0 - NP Policy 12 Design Standards for New Development, this is assessed and found to be compliant with sustainability objectives. It is given a score of “green question plus” on Objective 8, which is defined as “possible positive or slight positive impact”. Which is considered reasonable.

HDC Henfield Neighbourhood Plan, Addendum to Sustainability Appraisal (22 October 2019)

34. Section 3.0 / 3.7 onwards - Sites A, B, DD and K1 have been added back into the sustainability appraisal process for this Addendum document.
35. Sites B(n) / B(s) - arguably the score for both these greenfield sites as “none” or “no impact” could be challenged as indicating no sensitivity in heritage terms to built development. Although these sites are distant from the conservation area, they fall within the wider setting of a vernacular listed building within this edge area of the settlement / countryside. Therefore these sites could reasonably be considered to have at least a score of “amber question minus” on Objective 8. Perhaps comparable in some ways to Site Q or W.
36. Site K1 - arguably the score for this greenfield site as “none” or “no impact” could be challenged as indicating no sensitivity in heritage terms to built development. Although this site is relatively distant from the conservation area, it falls within the wider setting of a farmstead listed building to the south west and also within open country outside the settlement. Therefore this site could reasonably be considered to have at least a score of “amber question minus” on Objective 8.
37. 3.15 onwards - a further five potential strategic site options were identified as reasonable alternatives. Only Option 10 includes Site F; combined with other sites. The summary text states that “the spread of impacts around the settlement give rise to possible/slight negative impacts on a number of objectives including heritage with negative impacts on the countryside. Site Q, F and I should all have regard to localised heritage assets in the vicinity.” With regard to Possible Mitigation, again:

“A natural buffer/screen should be provided around any site on the edge of the settlement or in the open countryside to protect the character and visual impact of the countryside beyond ...

Regard should be given to the setting of localized heritage assets which impact on a number of sites in this option. Protection of the setting of heritage assets may inform the quantum of development to come forward.”

38. 4.2 onwards – “of the additional five options considered, none have been found to be more sustainable than those assessed in the original SA/SEA”. Again potentially challengeable where option 5 has been selected previously as the preferred option.

Henfield Parish Council Henfield Parish Design Statement (Revised 2019)

39. Page 4 - Conformity with National Planning Policy Framework 2018. This statement is outdated and should instead be in conformity with the NPPF 2019 and the relevant updated chapter / paragraphs regarding the historic environment

40. Page 4 / 7 onwards – Setting / Character. Text largely descriptive and generally comparable with landscape character assessment, conservation area appraisal and other published LPA or County planning / guidance documents.
41. Page 14 onwards – Design Guidance. Policy BD8 “New developments should have regard to the design and layout of traditional village housing and pay careful attention to street scene; variation in design within a development scheme of a number of dwellings is essential”, in my view would not be objectionable in light of NPPF, although what quantum a number refers to is unclear.
42. Policy CL1 “Views into and out of the area of the parish, and Henfield village in particular, make a significant contribution to its overall character and should be both preserved and respected in the design and positioning of any new development”, perhaps more landscape related, but in my view this policy would not fully accord with national or local planning policy where there fails to be an acknowledgement that not all views in and out would be positive in character and should therefore be preserved. This lacks a qualitative assessment where clearly there exist some views into and out of the conservation area at the core of the village that have detracting features and could be enhanced.