

Maureen Chaffe
Clapham Neighbourhood Plan Team
By email only

Our ref: 2015.05.07
Your ref: Clapham NP
SEA Scoping
RLS
Comments
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Dear Maureen

re: Clapham Neighbourhood Development Plan SEA Scoping

Thank you for asking Historic England to recommend the scope for consideration of the historic environment in the Strategic Environmental Assessment for the Clapham Neighbourhood Plan. Our remit is focused on the conservation and enjoyment of the historic environment and heritage assets, which we will restrict our comments to. We have previously set out guidance on preparing Strategic Environmental Assessments, which is available online at: <https://www.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>, although we are presently preparing a revised version to support neighbourhood for a in preparing neighbourhood plans.

In brief Strategic Environmental Assessment should be used to ensure that:

- the Neighbourhood Plan does not conflict with the aims and objectives of previously adopted plans and programmes;
- that the policies and proposals set out within the plan do not conflict with each other; and
- that the potential for negative impacts to the environment resulting from the options considered in the formulation of the plan have been considered and that negative options have been rejected and mitigation measures put in place within the plan to offset unavoidable negative impacts.

The SEA provides an important document for providing transparency for others in understanding how decisions were made in preparing the plan and for monitoring its effectiveness after it has been adopted to identify whether any modifications may be required.

Other plans and programmes



As the South Downs National park Authority have previously identified the emerging South Downs Local Plan will be an important document to consider in preparing the SEA and Neighbourhood Plan, whilst we note from the draft plan that it has taken account of the Arun Local Plan. We would also expect the Neighbourhood Plan to have been prepared with regard to any relevant policies or proposals set out within the West Sussex Waste Local Plan and West Sussex Transport Plan, as well as with regard to the National planning Policy Framework (NPPF). In particular regard should be had to the requirements for Neighbourhood Plans set out at paragraph 58 in the NPPF.

Environmental baseline

The SEA needs to establish the current condition of the environment to determine how this would be affected by the plan (including the options considered) in both positive and negative ways. With regards to the historic environment this should provide a description of the types of historic features found throughout the area, their known or probable distribution and a review of their importance and current condition. We note that much of this information is presented in the draft neighbourhood plan and would suggest supplementing this information with a few further details:

We would expect the overview statement to be illustrated with historic maps and focused on the development of its landscape. Assessing the importance of the historic features would include a review of the plan area's heritage assets, including an indication of the number and location of designated heritage assets in the plan area or in its immediate vicinity where there is potential for impacts on their settings.

Designated heritage assets include listed buildings, scheduled monuments, conservation areas, registered parks and gardens, registered battlefields and protected wrecks (unlikely to be encountered in Clapham). In reviewing the Parish's listed buildings it would be helpful to consider their distribution across the parish and whether this reflects any particular pattern of historic development and whether this is also reflected in the types and groups of buildings that are listed. For example is there a focus of cottages revealing the historic core of the village with historic farmhouses and traditional agricultural buildings spread more widely reflecting a dispersed rural settlement pattern that developed over many centuries?

We note the inclusion of the Conservation Area Character Description set out in the relevant documents section of the Neighbourhood Plan website. In addition to the character of the area, it is important that any site allocations have been chosen with regard to sustaining and enhancing the special historic or architectural interest of the conservation area (this is referred to as the area's 'significance' in the NPPF), which justifies its designation. We would recommend preparing a brief statement setting out the special interest of the area with the National Park Authority's conservation officer to form part of the evidence base for the SEA and the plan as a whole. This is likely to focus on the importance of the area in illustrating the village's long history, including the influence of features of the surrounding landscape such as its geological make up, as well as the representation of the local vernacular traditions. We note that historically the areas of the downs to the north and the common to the



south played an important role in the village's location and development. This will also help to underpin any decision made relating to the conservation area or land within it in future.

We note from the draft plan that there are no scheduled monuments designated within the Parish, although there are a large number in the immediate environs, which suggests this is a rich area archaeologically with a high potential for the presence of remains of national importance. It would be helpful to consider whether these are focused in a particular part of the parish and, as such whether these archaeological sites are likely to be affected by any site allocations or other projects and developments proposed.

In addition to designated heritage assets, the NPPF makes non-designated heritage assets a material consideration in planning and these should also be considered in establishing the plan area's 'environmental baseline'. This may include sites identified by local regimes such as 'local listing', recorded on the County Historic Environment Record (HER) or those identified through the planning process. Buildings of Local Character identified by Arun District Council and the SDNP's list of Buildings or Structures of Special Character represent one form of non-designated heritage asset found in the plan area. We note the proposed additions to this list set out in the draft Neighbourhood Plan and support this approach. These should be identified in the SEA environmental baseline as an important part of the plan area's heritage resource which should be taken into consideration in identifying site allocations and other policies.

Given the archaeological interest of the area surrounding the parish and a number of references to 'tumuli' on the modern Ordnance Survey map we strongly recommend undertaking a brief review of the records of the County HER to determine whether any known sites of archaeological remains have a level of interest that should be considered in planning decisions. We note that several are already identified in the draft plan. The County Archaeologist may be able to advise on preparing a brief statement describing the area's archaeological potential as a whole. We would recommend presenting this information as a map showing locations of previously identified remains colour coded by historical period with a brief commentary picking out features of interest that should inform preparation of the plan and the allocation of sites for development in particular.

We note that the description of character in the draft neighbourhood plan at 3.3.5 seems to have missed what we normally consider to be character in planning, which is the character of the landscape, including, but not exclusively its historic aspects. It would be worth considering whether the parish can be divided into a small number of broad 'character areas' within which the characteristic features can be defined – such as the distinctive form of field boundaries (e.g. walls, fences or hedges, etc.), characteristic tree cover or amount of woodland, presence or absence of scattered farm buildings and historical land use (arable, pastoral farming, industry returned to nature or forestry for example). Within the built-up area of the village it may help to define the typical positive character features enjoyed by the community. Providing such an analysis can help to determine whether policies should set out guidance on



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how development on specific sites should respond to local character to sustain positive features. I have included a link to the Oxford Character Assessment Toolkit and Historic England's 'Know Your Place' guidance in the list of useful sources of information below, which have both been developed to help local communities consider the character of their historic environments.

The County HER can provide access to the Sussex Historic Landscape Characterisation study. This provides evidence of the variation in historic landscape character (essentially the age, origin and past character of each part of the landscape) across the County, including within the plan area. This information could be presented as a map in the SEA and the plan, with a brief commentary to highlight how character varies across the area and whether any areas are identified as having a particular significance due to their contribution to the distinctive character of the area or that are locally rare or vulnerable examples of character. Providing greater detail on what the valued or 'unique' character of the area is will be vital in successfully implementing policies that refer to the need to protect these when considering new development. Based on the draft neighbourhood plan this should highlight the importance of flint and brick walls within the village, areas of public green space identified for their historic interest and, potentially, key views that should be considered when considering proposals for new development.

When considering the current condition of the historic environment it would be helpful to consider when describing each of the types of asset above whether there is evidence of any decline in their quality over time. For example, having considered what the significance of the conservation area, it should be possible to state whether any past phases of development have diminished its special interest and the character and appearance that reflect the interest. Such consideration should help to demonstrate why proposals, such as the introduction of an article 4 direction are considered necessary. We note that the plan has highlighted the damage revealed to a site of potential archaeological interest revealed during the Time Team investigations as evidence of an asset at risk.

Assessing Options

The site allocations suggested in the plan provide the main potential for significant environmental impacts on the character of the South Downs National Park. In considering these options we would recommend providing a brief consideration of the contribution of these sites to the historic environment of the plan area as a whole either positively or negatively and how this could change through their development. This should include a consideration of the cumulative impact of both sites being developed. Ideally this will include consideration of the influence of any design led policies that would help to ensure beneficial impacts are delivered through new development, such as the replacement of an area of land use that does not support the positive character of the area with development guided to make a more positive contribution.

From the above guidance we note that much of the evidence required for the plan is already presented in the draft neighbourhood plan and supporting documentation



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suggesting that this has already informed the development of the plan. We hope these comments are of assistance in using this and supplementing it to prepare a robust SEA that will help to guide the completion of the plan up to the submission stage and to monitor its implementation if and when adopted. If you have any queries relating to these comments or if there is any further information we can provide to assist you please don't hesitate to contact me.

Yours faithfully

Robert Lloyd-Sweet

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Appendix

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.english-heritage.org.uk>

Heritage Gateway: includes local records of historic buildings and features www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.english-heritage.org.uk>

<http://www.english-heritage.org.uk/caring/get-involved/improve-your-neighbourhood/> information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://www.english-heritage.org.uk/caring/heritage-at-risk>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing, <http://www.english-heritage.org.uk/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by English Heritage uses good practice to support the creation and management of local heritage lists. <http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <http://www.helm.org.uk/server/show/nav.19604>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place <http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>

