



Historic England

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12th December 2018

Dear Ms Harvey,

Hailey Neighbourhood Plan Regulation 16 Submission

Thank you for the e-mail of 8th November advising Historic England of the consultation on the Regulation 16 Submission Hailey Neighbourhood Plan. We have no record of having been consulted at the Regulation 14 stage but are pleased to make the following comments.

Paragraph 2.7 of the Plan states "*To deliver sustainable development the NPPF lists the following factors as desirable*". However, the list of "factors" that follow are identified by the National Planning Policy Framework 2012 as being rather more than "desirable". Paragraph 7 of the Framework explains that there are three dimensions to sustainable development; economic, social and environmental, and paragraph 8 explains that "*to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system*".

However, this is a moot point as paragraphs 2.3 – 2.7 will need revising to reflect the revised National Planning Policy Framework issued in July 2018. The revised Framework refers to the three former "dimensions" as "objectives" and requires them to be pursued in "mutually supportive ways". The environmental dimension/role/objective in both versions of the Framework includes contributing to "*protecting and enhancing our.....historic environment*".

We welcome the objective to "*Protect and enhance the Hailey Conservation Area*", although we suggest that it be reworded as "*Protect and enhance special interest, character and appearance of the Hailey Conservation Area*". We would also like to see an objective for the protection and enhancement of the significance of the other heritage assets in the parish (the 28 listed buildings and part of a scheduled monument) e.g. "*Protect and enhance the significance of heritage assets in the Parish*" and a further objective; "*To improve access to, understanding and appreciation of heritage assets in the Parish*". We would also like to see the related Goal to include the historic environment.



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We would welcome more about the historical development of the parish in section 4.

According to our records, neither of the two allocated housing sites identified in Figure 5.4 would be likely to affect the significance or special interest of a designated heritage asset, but they may have an impact on locally important buildings or archaeology. Have the Oxfordshire Historic Environment Record and/or the County Archaeologist been consulted on these sites ?

We suggest that Policies H1 and H2 could be combined and rationalised e.g.

In order to deliver a minimum of 33 new homes in the rural villages as a whole planning permission will be granted for:

- i. a minimum of 8 homes on Land opposite 'The Hollies', New Yatt Lane, New Yatt;*
- ii. a minimum of 15 homes Land adjacent to Hailey Rugby Club, Hailey Road, Hailey; and*
- iii. 10 homes on windfall sites in accordance with Policy H3*

provided that:

- a) a minimum of 6 affordable homes is provided as part of the development on Land adjacent to the Rugby Club; and*
- b) applications for the two allocated sites are supported by masterplans for each site providing a balanced and appropriate mix of residential accommodation to meet identified needs; and*
- c) the development would reflect the form, scale and pattern of the settlement and respects its character; and*
- d) the development would conform with other policies of this Plan and of the West Oxfordshire Local Plan.*

We are not clear who should reserve land to allow for the potential expansion of Hailey CE Primary School as required by Policy ED1. It is for the Plan to identify safeguarded land if it can be justified.

We welcome paragraphs 11.8 – 11. However, we prefer to see the term “historic environment” separated from “built environment” – clauses c) and d) of paragraphs 8 and 20 respectively of the National Planning Policy Framework 2018 refer to the natural, built and historic environment, and the Glossary to the Framework includes a specific definition of the historic environment.

We welcome the references to the 28 listed buildings and the Hailey Conservation Area. However, we would welcome some more detail about the Conservation Area e.g. what its special interest (the reason for its designation in 1992) is, whether it has been reviewed since and whether there is a Character Appraisal and/or Management Plan ? (The Hailey Conservation Area Preservation and Enhancements document) ?

(If not, the preparation of an Appraisal and Management Plan could be a community project. Historic England's Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies: <https://historicengland.org.uk/advice/planning/understanding-historic-places/>. The 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>. (We would be pleased to advise further).

Is there a list of locally-important buildings and features throughout the parish? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. If not, then this could usefully be another community action project to expand the evidence base for the Plan (advice on local listing is available on our website - <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/> - and we would again be pleased to provide further assistance).

National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”. Are there any archaeological records for Hailey on the Oxfordshire Historic Environment Record? Has the Oxfordshire Historic Landscape Character Assessment been consulted as part of the evidence base for the Plan?

Has there been any or is there any ongoing other loss of character in the Conservation Area (or elsewhere), e.g. through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc that affect local character?

Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include Grade II listed secular buildings outside London. Has a survey of the condition of Grade II buildings in the Plan area been undertaken? If not, this could be another community action project to add to the evidence base for the Plan.

We welcome Policy E1, although it perhaps needs recasting slightly to make it clear that planning permission will not be granted for development that would harm the special interest, character and appearance of the Conservation Area, to be consistent with clause d) of paragraph 16 of the National Planning Policy Framework; “*Plans should.....contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”.

We note that the Plan does not contain any policy on design. Paragraph 125 of the National Planning Policy Framework requires plans to; “*at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development*”.



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We consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan to provide that “*understanding and evaluation of each area’s defining characteristics*”. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. Has any such assessment been undertaken for Hailey ?

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Hailey please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



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