



Historic England

John Fox
Chairman
Wheatley Neighbourhood Plan Committee

Our ref: HD/P5355/
Your ref:
Telephone 01483 252040
Fax

23rd June 2017

Dear Mr Fox,

Wheatley Neighbourhood Plan Pre-Submission Consultation Draft

Thank you for your e-mail of 10th May advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.

The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.

We welcome the tantalising references to the history of Wheatley in paragraph 3.1 (“*a continuous history of habitation back to pre-Roman times and since late Saxon times has served travellers from Oxford to London*”) and paragraph 3.8 (“*The OBU site was once part of Holton Park, an important medieval deer park, residence and estate for about seven centuries. It is also a site of Civil War significance being home to Jane Whorwood, King Charles I’s secret agent, and HQ to General Fairfax for his siege on Oxford*”).

Also in paragraph 3.18 (“*The village centre is based on the High Street, a mixture of 18th century town houses, refurbished cottages and a row of 1960s shops with flats above*” and The Merry Bells “*Together with a mixture of listed buildings.....forms the centre of the Conservation Area*”).

We particularly welcome the section on “Character”, although it is about the history of Wheatley, not its character. We would also like to see a reference to the number of designated heritage assets (listed buildings and scheduled monuments) in the Plan area (XX and YY respectively in Wheatley parish). it would be helpful to say a little more about the conservation area; e.g.when were they designated ? Has the designation been reviewed ? What is its special interest (the reason for designation) ? Is there a character appraisal and/or a management plans for the conservation area ?



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Is there a list of locally-important buildings and features ? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. Have the Oxfordshire Historic Environment Record and Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance ?

The 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*”.

Is the condition of heritage assets in the parish an issue ? 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 buildings outside London. Has there been a survey of the condition of grade II buildings in the Plan area or has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

We are pleased to note from paragraph 3.9 that the setting and history of the village was one of the principal reasons for the popularity of the village as a place to live. We welcome, in principle, “respectful of its heritage” in the Vision (VCh1V), but are disappointed that heritage is not a specific element of the Vision and not reflected in the associated Objective (VCh1O). We would like to see a reference in the Vision to a “conserved and enhanced historic environment” and a specific objective for the “conservation and enhancement of the historic environment” (akin to EL2V and EL2O1 for the “Quality of the environment and natural landscape”).

We have assessed proposed housing site WHE18, The Railway Inn and BT Exchange, against our records of designated heritage assets, having already assessed the former OBU campus for the recent consultation on the Second Preferred Options of the South Oxfordshire Local Plan.

Site WHE18 does not contain any listed buildings, although there are listed buildings in the vicinity, including the Grade II listed War Memorial. As far as we can tell from Figure 6.1 and the Local Plan Proposals Map the site is outside but adjacent to the conservation area and therefore within its setting.

For the former OBU campus, in our comments on the Second Preferred Options of the South Oxfordshire Local Plan, we said, in respect of Policy STRAT10 – Land at Wheatley Campus:

“Any redevelopment of the campus should therefore retain the Scheduled Monument on the site and respect both its setting and that of the Scheduled Monument and listed buildings to the north-west. We therefore welcome requirements i) (in principle) and ii) of Policy STRAT10 that development proposals

should deliver “A scheme of an appropriate scale and layout in a form that respects the listed building and its setting” and “A layout and form which provides an appropriate buffer to protect the Scheduled Monument”.

Any redevelopment of the campus should therefore retain the Scheduled Monument on the site and respect both its setting and that of the Scheduled Monument and listed buildings to the north-west. We therefore welcome requirements i) (in principle) and ii) of Policy STRAT10 that development proposals should deliver “A scheme of an appropriate scale and layout in a form that respects the listed building and its setting” and “A layout and form which provides an appropriate buffer to protect the Scheduled Monument”.

However, further assessment of the significance of the Monuments and listed buildings and of the potential impacts of development on that significance, may be necessary to determine the form that development should take to avoid or minimise harm to the significance of the heritage assets as part of the adequate, up-to-date and relevant evidence about the historic environment required by the National Planning Policy Framework. Indeed, we note that Table of the Sustainability Appraisal recommends “A predetermination archaeological desk-based assessment and evaluation should be undertaken to establish a suitable and appropriate level of mitigation”.

Policy STRAT10 should therefore require a requirement for “A comprehensive survey of above and below ground archaeology and the listed buildings to determine the extent and significance of archaeological remains and the significance of the buildings and their setting, on and adjacent to the site, to inform and guide the development proposals, with appropriate mitigation”. Without that further detailed assessment, Historic England **objects** to Policy STRAT10. This assessment may require more than a desk-based assessment and evaluation.”

Accordingly, we would like to see a requirement in Policy H2 of the Neighbourhood Plan for the Design Briefs for each site to consider the relation of development on either site with heritage assets or on near the site and their setting. Reference could also be made within Policy SP1. We welcome paragraph 9.27 and requirements k), l) and m) of Policy SP2, although “geological” in l) should be “archaeological”. However, there should also be greater reference to the conservation and enhancement of the listed buildings and their setting.

We welcome the reference to ancient monuments in the sixth bullet point of paragraph 8.25.

We also welcome Policy DSQ1 in principle; paragraph 58 of the National Planning Policy Framework states “...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.”

Is there that “understanding and evaluation” of Wheatley’s defining characteristics” ? Is there, for example, a Village Design Statement ? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan.

The appendix to this letter contains links to further information on characterisation. 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. We would be pleased to offer further information on this matter.

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We would welcome a policy specifically for the conservation and enhancement of the historic environment of the Plan area, in accordance with the National Planning Practice Guidance advice to “*put broader strategic heritage policies from the local plan into action at a neighbourhood scale*”.

Finally, two general observations. We think the Plan could be clearer in setting out in detail the issues affecting Wheatley that the Plan’s policies and proposals are intended to address. In our experience Neighbourhood Plans usually include a section on issues that have been identified through the community consultation process and/or higher level plans, which then inform and justify the Plan’s policies and proposals.

Also, the preparation of the Neighbourhood Plan offers the opportunity to harness a community’s interest in the historic environment by getting the community to help add to the evidence base, perhaps by inputting to the preparation or review of a conservation area appraisal, the preparation of a comprehensive list of locally important buildings and features, and/or a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats.

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 Wheatley, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours sincerely,



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Appendix: Sources of Information

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



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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.historicengland.org.uk>

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>
has 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://risk.historicengland.org.uk/register.aspx>

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.historicengland.org.uk/publications/knowing-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 Historic England, uses good practice to support the creation and management of local heritage lists.
<http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

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

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