

New Milton Town Council
Town Hall
2 Ashley Road
New Milton
BH25 6AS.

Our ref: HD/P5235/
Your ref:

Telephone
Fax

1st May 2018

Dear Sir or Madam,

New Milton Neighbourhood Plan Pre-Submission Consultation Draft

Thank you for your e-mail of 3rd April advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments that reflect our remit as the Government's adviser on the historic environment.

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 brief history of the New Milton in paragraphs 2.4 – 2.9 and the references to the 31 listed buildings and structures in New Milton and to the Old Milton Green Conservation Area in paragraphs 2.19 and 2.20. is there a Conservation Area Character Appraisal and/or Management Plan ?

Reference could be made here to the “Buildings of Local Heritage and Townscape Value” as well as/instead of paragraph 6.65. 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 Hampshire Historic Environment Record and Hampshire 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*”.



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We welcome the reference to the New Milton Local Distinctiveness SPD in paragraph 2.24 as 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.

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 also welcome the recognition of and references to paragraph 126 of the National Planning Policy Framework and the principle therein “*Sustaining and enhancing the significance of heritage assets*” in paragraph 3.2. We also welcome the references to Policy CS3 of the New Forest District Council Core Strategy in paragraph 3.3 and Policy CP7 of the New Forest National Park Core Strategy in paragraph 3.10.

For section 4, has a survey of the condition of grade II buildings in the Plan area been undertaken ? (The Historic England Heritage at Risk Register does not include grade II listed secular buildings outside London). 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 would have liked to see a reference to the conservation and enhancement of heritage assets in the Plan area in the Vision and as an objective.

We have assessed the sites at Brockhills Lane, South of Gore Road and East of Caird Avenue allocated for development by Policies NM3, NM4 and NM5, and the sites identified in Policy NM6 for redevelopment in the town centre, against our records of designated heritage assets. None of the sites contain or appear to be within the setting of any such assets.

We welcome Policy NM7D in principle, although we believe that “harm” in the final paragraph of the policy should be “benefits” as, as currently drafted, the policy lends support to development proposals that cause greater harm to a Building of Local Heritage or Townscape Value .

We also welcome Policy NM11 and particularly Policy NM16. We consider that the latter conforms with the requirement of paragraph 58 of the National Planning Policy Framework, which 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.*”

The New Milton Local Distinctiveness SPD provides the required “*understanding and evaluation*”. (Whilst comprehensive, Policy NM11 is not robust – it only requires new development proposals to “have regard to” the specified design characteristics).



Finally, 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, or a survey of grade II listed buildings to see if any are at risk from neglect, decay or other threats.

We are therefore pleased to see the stated intention of the Town Council to work with others to prepare a conservation area appraisal for the Old Milton Conservation Area. Historic England has published advice on conservation area designations and management and is currently consulting on revisions to that advice, the link to which is:

<https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/>

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 New Milton please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: 

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>

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/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 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

<http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



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