



Historic England

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18th January 2019

Dear Sir or Madam,

Hanslope Parish Neighbourhood Plan 2016 - 2031

Thank you for your e-mail of 6th December 2018 advising Historic England of the consultation on the Hanslope Parish Neighbourhood Plan. We have record of having been consulted at the Regulation 14 stage (we note that the Consultation Statement does not identify the 28 statutory bodies which were notified of the consultation on the Pre-Submission Plan, nor specifically when they were notified), although we were consulted on the SEA screening opinion. Nevertheless, we are pleased to make the following comments in line with our remit for the historic environment.

We welcome Plan B, showing the Conservation Area, and paragraph 2.2 noting the designated heritage assets in the parish. However, we would have welcomed an overview of the historical development of the parish and Hanslope itself, information on which can be found in the Hanslope Historic Town Assessment Report, although we note that this is contained within the Hanslope Character and Design Statement.

We consider that it would be helpful to set out what the special architectural or history interest of the Conservation Area is (the reason for its designation) and to note whether or not it has a character appraisal and/or management plan (if not, this could be a community project to add to the evidence base for the Plan – we would be pleased to advise further).

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. (If not, then the preparation of such a list would be another excellent community project to further add to the evidence base for the Plan - we would again be pleased to advise further).

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*



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include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions”.

The Guidance notes that *“The local Historic environment record and any local list will be important sources of information on non-designated heritage assets”*. Has the Milton Keynes Historic Environment Record been consulted for archaeological records in the parish The Hanslope Historic Town Assessment Report also contains information on archaeology in the settlement and on historic landscape character.

We consider that the Vision set out in paragraph 5.1 of the Plan accords with paragraph 29 of the National Planning Policy Framework (2018), which states *“Neighbourhood planning gives communities the power to develop a shared vision for their area”*. However, we are disappointed that the Vision does not include any specific reference to the historic environment or heritage assets of the parish – we would welcome rewording such as *“Hanslope will recognise, value, protect and enhance its natural and heritage assets, and its important rural heritage, culture and character”*.

We welcome, in principle, Objective 2. However, conservation areas are areas of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. In addition, development within the setting of the conservation area can affect its character and/or appearance. The objective should therefore be *“New developments within the Conservation Area or its setting should preserve or enhance its character and/or appearance.....”*.

The characteristics of different areas in Hanslope, including the Conservation Area, are identified in the Hanslope Historic Town Assessment Report and the Hanslope Character and Design Statement, which we welcome (although we note that it does not contain a map showing the different character areas).

We consider that Neighbourhood Development Plans should be underpinned by such a thorough understanding of the character and special qualities of the area covered by the Plan. (We note that paragraph 1.2 of the Plan refers to the policies of the Plan aiming to protect the special character of the villages of Hanslope and Long Street and of the wider parish, which requires the understanding of that special character).

We also believe that characterisation studies can 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 also like to see a specific objective for new development to conserve or enhance the significance of other heritage assets, including listed buildings.

Paragraph 154 of the National Planning Policy Framework (2012) requires plans to include only policies *“that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”*. Although this is in respect of local plans, paragraph 16 of the revised Framework (2018)’s requirement for plans to *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”* applies to all plans.



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Paragraph 5.5 of the Plan recognises these requirements; *“Policies must be clearly written so they can be easily applied when considering planning applications”*. However, Policy HAN1 does not, in our view, itself provide a clear indication of how a decision maker should react to development proposals.

As drafted, paragraph 5.5 implies that the National Planning Policy Framework and the policies of the Local Plan will not be relevant considerations for planning matters that fall within the scope of the policies in the Plan. However, the strategic policies of the Local Plan will apply, where relevant, to planning applications in Hanslope parish, regardless of whether or not the policies of the Neighbourhood Plan are also relevant (particularly as the Plan deliberately avoids repeating those local plan policies). The National Planning Policy Framework will remain a material consideration that could, in theory at least, indicate a decision other than in accordance with the adopted development plan (which will include the policies of the made Neighbourhood Plan).

We therefore suggest that paragraph 5.5 be revised slightly to read *“For all planning matters, the national and local policies of other planning documents – the National Planning Policy Framework and the strategic policies from the adopted Milton Keynes Local Plan - will continue to be used”*.

We note that four of the five development sites identified in Policy HAN2 already have outline planning permission, so we make no comment on the selection of these sites. According to our records, Site D does not contain, nor is within the setting of, any designated heritage assets. Normally we would draw attention to the possibility of non-designated archaeological remains on a site, but given that this is a relatively small and previously-developed site, we consider that the potential for such remains is low (assuming that no significant finds were found during the development of Williams Close). We therefore have no objections to the allocation of this site.

We welcome and support Policies HAN3 and HAN4, which we consider to be consistent with paragraph 58 of the National Planning Policy Framework (2012) (and paragraph 125 of the revised Framework (2018)), with the required understanding and evaluation of the area’s defining characteristics being provided by the Hanslope Historic Town Assessment Report and the Hanslope Character and Design Statement.

We would, however, suggest that the third bullet point of Policy HAN4 be slightly reworded to read *“.....must sustain and enhance the special character and appearance of the Area and significance of those assets”*.

There are no buildings within the parish on the 2018 Historic England Heritage at Risk Register. However, 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 project to add to the evidence base for the Plan and we would again be pleased to advise further.

As a general comment, it is our experience that Neighbourhood Plans set out the sustainability issues facing the Plan area, which in turn helps justify the objectives, policies and proposals of the Plan.



We note that section 4 of the Plan sets out the community view on planning issues. However, we feel that this could be expanded, or another section added, to set out more clearly the sustainability issues that face the Plan area, and which therefore justify the objectives, policies and proposals of the Plan.

For example, has there been any or is there any ongoing other loss of character, particularly in the Conservation Area, e.g. through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc that affect local character, which would provide the rationale for Policy HAN3 ?

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, as noted in our comments above, a more detailed character assessment of the Conservation Area, the preparation of a local 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 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 Hanslope, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



Martin Small
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