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27th September 2018

Dear Mrs Webber,

Ravenstone Neighbourhood Plan 2018 to 2031

Thank you for your e-mail of 5th August advising Historic England of the consultation on the Ravenstone Neighbourhood Plan. We are pleased to make the following general and detailed comments in line with our remit for 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 paragraphs 1.1 - 1.6 on the historical development of the parish and paragraphs 1.11 - 1.18 on heritage assets within the parish. We particularly welcome the reference to the Milton Keynes Historic Environment Record as 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*”.

However, 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. Also, National Planning Practice Guidance notes that “*The local Historic environment record and any local list will be important sources of information on non-designated heritage assets*”.

If so, then reference should be made to it within the Plan, If not, then the preparation of such a list would be an excellent community project to further add to the evidence base for the Plan. The appendix to this letter contains a link to our advice on local listing and we would be pleased to advise further.

Has the designation of the Conservation Area been reviewed since 1970 ? Is there a Character Appraisal and/or Management Plan for the Conservation Area ?

Paragraph 2.10 will need to be revised to reflect the revised National Planning Policy Framework published in July 2018.

Did the parish survey questionnaire include a question about the historic environment ?

We note that the challenges for the community include protecting and enhancing the character of the village and the Vision refers to the rural character of Ravenstone. Has any study been undertaken to establish that character and what contributes to or detracts from that character ?

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. We 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.

The preparation of a Village Design Statement or Character Assessment would be another very useful addition to the evidence base for the Plan and a potential community project. The appendix to this letter contains links to characterisation toolkits and again we would be pleased to advise further.

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

There are no designated heritage assets in the parish on the 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 project to add to the evidence base for the Plan.

We feel that the Vision reads more as an aim or objective of the Plan rather than a vision for the community. We suggest that it could set out how the local community would like Ravenstone to be in 2031. We would hope that that vision would include something like *"a conserved, enhanced, appreciated and valued historic environment"*.

We note the objective to protect the views of the countryside surrounding the village which are considered to be an integral part of the character of Ravenstone and the Conservation Area. We presume that the green shaded areas on Figure 15 are intended to indicate these views ? If so, they might be construed as indicating that the views are limited in extent to the shaded area – is this the intention ? How have these views been identified ? In a Conservation Area Character Appraisal ?



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We would have liked to see a specific objective under Character and Design for the conservation and enhancement of the historic environment of the parish.

We welcome Policies CD1 and CD3, which we consider to be consistent with paragraph 125 of the National Planning Policy Framework: *Plans should, 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.*

However, as noted earlier in this letter, we are not clear if there is an “*understanding and evaluation of each area's defining characteristics*” – there is no mention of any Village Design Statement or character assessment of the conservation area, the village or the Parish, although we note the reference to previous Village Plans.

We welcome Policy CD2, although we suggest one slight amendment – the inclusion of the words “special interest” between “significance” and “quality”.

We welcome the inclusion of heritage constraints as a criterion in the site selection methodology. We note that the housing site allocated by Policy H2 is identified as potentially affecting a range of designated and non-designated heritage assets – the Grade II listed Almshouses, the Ravenstone Priory Scheduled Ancient Monument, the Grade I listed All Saints Church and potential buried archaeological remains. It also appears to be partly within the Conservation Area.

We note that this is a previously-developed site and that “*The existing buildings on the site are relatively low quality and do not make a positive contribution to the setting of the Almshouses or the SAM*”. We therefore agree that it could potentially result in an enhancement to the setting of the designated heritage assets, although residential development is likely to be more intensive and could therefore be harmful.

Therefore, whilst we welcome the requirement in Policy H2 for the development to be very sensitive to nearby heritage assets, we consider that in order for the allocation of this site for housing development to be acceptable to us, it should be justified and supported by a Heritage Impact Assessment that identifies the significance of the Conservation Area and nearby heritage assets, the likely effect of the development of the site on that significance and how any development proposals could avoid or mitigate any harmful impacts,

In addition, whilst we welcome the requirement in Policy H2 for a development proposal to be supported by an appropriate archaeological desk based assessment. However, it may be necessary to undertake a field evaluation if the desk-based assessment identifies likely archaeological interest,



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We also suggest that, to make the Plan's allocation of this site more robust, it should be clearly explained why this site has been selected over the other potential housing sites.

We welcome the second criterion of Policy H3, and would like to see it included in Policy BE1.

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, the preparation of a local list of locally important buildings and features, a character assessment or Village Design Statement, 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 Ravenstone, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



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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>

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/known-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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