Consultation comments on policy HE13 - Non-designated historic rural and industrial heritage assets

- Support 10
- Neither support of object 2
- Object 1

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Respondent number	Comment	Officer comment
	[This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations which includes the relevant figures and appendices, with tables correctly formatted]	Comments noted Recommended response: no change
ANON- KSAR- N8MP-M	Paragraph 189 of the Framework seeks to conserve and enhance the historic environment and sets out that heritage assets are an irreplaceable resource that should be conserved so they can be enjoyed for their contribution to the quality of life or existing and future generations. Winchester has a rich and diverse historic environment that provides a valuable contribution to its identity and culture. Strategic Policy HE1 confirms the Plan will protect the district's designated and non-designated heritage assets in accordance with the Framework and Policies HE2-HE14 set out the approach through which this will be achieved.	
	Crest Nicholson is broadly supportive of the aims of these Policies	

and notes the development proposal for land in the N	•
MDA is not located in close proximity to any designate designated heritage assets and the allocation of furth	
location will therefore reduce development pressure	•
historic environment.	

Comments which neither support nor object to policy HE13 - non-designated historic rural and industrial heritage assets

Respondent number	Comment	Officer comment
ANON- KSAR-NK1Z- N Shedfield Parish Council	It is not necessarily appropriate to convert agricultural buildings that are no longer required for their original purpose. The setting and location should dictate whether the proposal should be allowed	This is covered by permitted development and the Local Plan has limited control in this. The conversion of agricultural buildings must comply with the detailed criteria set out in this policy. Recommended response: no change
BHLF-KSAR- N8BQ-A Historic England Link here	Policy HE13 - comment We suggest minor wording changes to improve alignment with the terminology in the NPPF. We note that there is an IIA recommendation that "Policy HE13 could be strengthened by requiring changes of use to demonstrate that there would be no unacceptable increase in traffic and adverse effects relating to biodiversity and landscaper character considering the buildings rural location. Alternatively, the policy could cross reference to the other relevant policies in the plan that address	Agree to suggested changes and policy altered accordingly to wording of policy which can be seen to the left. New text = bold and underlined Removed text = strikethrough

these issues." And mention that here in case the Council has yet to consider this.

Changes in agricultural and industrial practices and demands have resulted in a number of rural and industrial buildings and structures falling into disuse. Some of these buildings and structures will have historic, archaeological or architectural significance and the local planning authority will consider whether

or not there is justification to include a redundant building on the council's list of non-designated heritage assets.

Changes to policy text outlined below:

The change of use of redundant agricultural and other rural or industrial buildings that are identified as non-designated heritage assets will be permitted provided it accords with the Development Plan and it can be demonstrated that:

- i. The building is capable of conversion without significant structural alteration or replacement, or changes which would be detrimental to the distinctive character and historic significance of the building or its setting, its historic fabric, or features. If the subdivision would harm the significance of the building, this should be clearly and convincingly justified;
- ii. The building is incapable of being used in a manner that is less harmful to its **significance** significant historic or architectural interest, or its setting;
- iii. If the existing use of the building that forms part of its significance is not viable, residential use should be clearly and convincingly justified; and
- iv. If the building forms part of a complex of agricultural or industrial buildings, a comprehensive strategy is put forward which clearly demonstrates the effects on all heritage assets and their settings. Para 8.40 comment

A minor wording change is suggested to acknowledge the potential

for archaeological interest with old rural and industrial buildings and structures

Supporting text changes:

Changes to para 8.56

It is rare that there are no opportunities to upgrade or improve the thermal or energy efficiency of an historic building. Sometimes a building is so sensitive these changes can only be small. Sometimes lateral thinking is required. Often there will be benefits in looking at a site in its widest context to see whether there are any opportunities to offset carbon emissions beyond the building envelope, such as installing air/ ground source heat pumps, planting wind breaks or introducing reed beds for water filtration, for example. It is important that care should be taken to ensure that such proposals do not adversely affect buried archaeological remains and suggest consultation with the Winchester City Council archaeologist may be needed.

Para 8.40 comment - A minor wording change is suggested to acknowledge the potential for archaeological interest with old rural and industrial buildings and structures.

Changes in agricultural and industrial practices and demands have resulted in a number of rural and industrial buildings and structures falling into disuse. Some of these buildings and structures will have historic, **archaeological** or architectural significance and the local planning authority will consider whether or not there is justification to include a redundant building on the council's list of non-designated heritage assets.

Comments which object to policy HE13 - non-designated historic rural and industrial heritage assets Respondent Comment Officer comment			
number			
BHLF-KSAR- N8BD-W	Policy HE13 - Non-designated historic rural and industrial heritage assets. Objections and comments Paragraph iii: The Trust objects to the omission of an explanation as to how viability will be determined ("If the existing use of the building that forms part of its significance is not viable, residential use should be clearly and convincingly justified") in contrast to the loss of an employment use in	Commented noted It is important that the Local Plan should be read as a whole and viability of existing use should not be the sole determiner as to whether it should be replaced with residential.	
	paragraph 10.101 of the Creating a Vibrant Economy section.	Recommended response: no change	

Comments from other topics			
Respondent number	Comment	Officer comment	
ANON-KSAR-NK1Z-N Shedfield Parish Council	Policy HE13 Change of Use of redundant agricultural and rural or industrial buildings. Further investigation should be undertaken before granting permission for conversion to ensure the proposal accords with the policy. Conversion	Comments noted This will need to be conducted on a case by case basis during the planning application stage.	
		Recommended response: no change	

ANON-KSAR-N8EX-M Policy HE13 provides for the change of use of non-designated heritage assets in certain circumstances but is limited in its scope to rural areas. Such protection should also be afforded to non designated assets within town centres and settlement boundaries. The wording of these policies should be tightened up so that when allocating sites for development, there is greater recognition of the need to avoid impacts on heritage assets, both designated and non designated. Comments noted This will need to be conducted on a case by case basis, non-designated heritage assets is that often they are not known until it is brought to a planning application. Recommended response: no change.		under Permitted Development should not be automatic	
	ANON-KSAR-N8EX-M	Policy HE13 provides for the change of use of non-designated heritage assets in certain circumstances but is limited in its scope to rural areas. Such protection should also be afforded to non designated assets within town centres and settlement boundaries. The wording of these policies should be tightened up so that when allocating sites for development, there is greater recognition of the need to avoid impacts on heritage	This will need to be conducted on a case by case basis, non-designated heritage assets is that often they are not known until it is brought to a planning application.

	Recommendations	Officer response
Comments from SA/HRA	Policy HE13 could be strengthened by requiring changes of use to demonstrate that there would be no unacceptable increase in traffic and adverse effects relating to biodiversity and landscaper character considering the buildings rural location. Alternatively, the policy could cross reference to the other relevant policies in the plan that address these issues.	It is important to read the LP as there are a number of other policies in the LP that cover these points.

Amendments to supporting text

Change to paragraph 8.56

It is rare that there are no opportunities to upgrade or improve the thermal or energy efficiency of an historic building. Sometimes a building is so sensitive these changes can only be small. Sometimes lateral thinking is required. Often there will be benefits in looking at a site in its widest context to see whether there are any opportunities to offset carbon emissions beyond the building

envelope, such as installing air/ ground source heat pumps, planting wind breaks or introducing reed beds for water filtration, for example. It is important that care should be taken to ensure that such proposals do not adversely affect buried archaeological remains and suggest consultation with the Winchester City Council archaeologist may be needed.

Change to paragraph 8.40

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Amendments to Policy HE13

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- iv. If the building forms part of a complex of agricultural or industrial buildings, a comprehensive strategy is put forward which clearly demonstrates the effects on all heritage assets and their settings.