



## ENGLISH HERITAGE

### The Christchurch and East Dorset Council's Core Strategy / Local Plan Examination in Public

#### Matter no. 11 - Other matters

#### Historic heritage

#### 3. Policy HE1 protection of local historic and archaeological interest

A is the policy heading coherent?

B is the policy consistent with the NPPF?

C is the policy internally consistent?

#### Statement of English Heritage (no. 359478)

##### 1. Which soundness criteria it fails

- Positively prepared – inconsistent with national policy for the delivery of sustainable development
- Effective
- Justified - failure to provide proportionate evidence.
- Inconsistent with NPPF.

##### 2. Why it fails and how the plan may be made sound.

The Plan does not contain a clear policy/strategy for enhancing the historic area<sup>1</sup> and is therefore inconsistent with the NPPF and the obligation to enable the delivery of sustainable development in accordance with its policies - one of the core dimensions of sustainable development being the protection and enhancement of the historic environment<sup>2</sup>.

##### *Section 14 page 165 Protection of buildings of local historic and architectural interest*

The title of this section and policy HE1 is misleading. What if a heritage asset is not a "building"?

"Key facts" page 166.

This schedule appears to set out the key heritage features of both Districts. However it excludes reference to scheduled monuments or the number of assets on the national heritage at risk register.

Christchurch has two scheduled monuments on the national Heritage at Risk Register (2012). In East Dorset there are 41 scheduled monuments; 3 buildings, and 1 registered park on the register.

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<sup>1</sup> NPPF paragraph 157

<sup>2</sup> NPPF paragraph 7

“Evidence” page 166

Conservation Area Appraisals are the only evidence referred to. This Plan is surely unsound if the only “relevant” historic environment evidence is Conservation Area Appraisals?

The equivalent section for the natural environment, page 152, includes a thorough schedule and commentary of the evidence available and gathered and its relevance to the subsequent strategy/policy. Is the same for the historic environment not a reasonable expectation?

To provide a clear and positive strategy for the conservation and enjoyment of the historic environment, the issues affecting the historic environment, such as the condition of its heritage assets, need to be set out in the evidence base. A response to these local circumstances can then inform the local heritage strategy, including positive improvements in the quality of the historic environment in the pursuit of sustainable development<sup>3</sup> (NPPF paragraph 9). As this has not been clearly demonstrated in the Plan it is not therefore JUSTIFIED because it is not founded on robust and credible evidence, nor is it CONSISTENT with national planning policy and as a consequence it is UNSOUND.

### **Policy HE1 - Protection of local historic and architectural interest, page 166**

The *Schedule of Proposed Changes* relating to Policy HE1 indicates a Policy that is unclear, repetitive, incomplete and inconsistent with the NPPF.

The title, as previously mentioned, is misleading. The first paragraph only refers to the protection of heritage assets rather than its conservation which includes its *protection and enhancement*. It also appears to be superfluous as it repeats the second paragraph.

The third paragraph is grammatically confusing and again repeats the first and second sentences in part.

The fourth paragraph makes a welcome reference to Local Lists, the use of Article 4 Directions and the updating of conservation area appraisals. It then goes on to state “Development proposals affecting such sites or buildings will be sympathetic to their character and will respect their key architectural or historic features”. Again this does not read well e.g. which “sites or buildings”, nor does it appear to be consistent with the language of the NPPF.

The Policy is also silent in a few areas that could be expected to have been included. As a consequence to accord with the NPPF, I would recommend that the policy is redrafted. As the local authority intends to prepare a separate Development Management DPD, a Strategic Core Policy for the Historic Environment need not go into how applications should be considered. A possible version could however include the following:

#### *Valuing our Historic Environment*

- *Heritage assets will be protected and enhanced especially elements of historic environment which contribute to the distinct identity of Christchurch and East Dorset.*<sup>4</sup>

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<sup>3</sup> NPPF paragraph 9

<sup>4</sup> You could go on here to refer to key historic elements of both area(s) to be given particular conservation emphasis e.g. the distinctive market towns such as Wimborne; Christchurch Quay; Highcliffe and Christchurch castles; 11th century Christchurch Priory Church and Saxon Mill; site of a civil war siege in 1645; the setting of

- *As part of its heritage strategy a publicly accessible Dorset Historic Environment Record will be maintained; Conservation Area Appraisals will be kept up to date, and; Article 4 Directions used where necessary.*
- *Local Lists of heritage assets will be maintained to support the conservation of non-designated assets of distinctive local character.*
- *Both Councils will seek to promote and support initiatives to reduce the number of heritage assets at risk including the sensitive re-use and adaptation of historic buildings.*
- *Working with the Highways Authority, Town and Parish Council's, highway infrastructure and public realm works will be designed to protect and enhance the historic environment.*

### **Delivery/monitoring**

The Plan fails to set out how the historic environment strategy and policy will be delivered and monitored and as a consequence it cannot be considered to be EFFECTIVE.

I refer in comparison to the equivalent section issued for *managing the natural environment*. Surely it is reasonable to expect an equivalent for the historic environment?

**The local authority may find *Heritage in Local Plans: how to create a sound plan under the NPPF (English Heritage June 2013)* of value.**