

From: Lloyd Sweet, Robert
Sent: 05 November 2021 15:46
To: Neighbourhood Planning
Cc: Gallo, Luciana
Subject: Fw: Houghton Neighbourhood Plan Regulation 16 Consultation

To whom it may concern:

Thank you for consulting Historic England on the submission version of the Houghton Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment including advising on the conservation of heritage assets and champion good design in historic places. As such, our review of the plan is limited to those areas that fall within our remit and silence on other matters should not be treated as agreement or consent.

I am pleased to confirm we have no objection to the plan policies or proposals. We wish to express particular support for policy HTN4 which we feel provides detail to guide design that is appropriate to the neighbourhood level, along with the guidance set out at Table 2: Key characteristics.

With regard to Policy HTN5 it would be helpful to clarify whether the buildings and features identified are considered non-designated heritage assets or features that make a positive contribution to the significance of the conservation area (a designated heritage asset).

They may of course be both but it is important to consider that the NPPF gives greater weight to the conservation of designated heritage assets. Historic England Advice Note 1 provides advice on factors to consider in identifying features that contribute positively to conservation areas, whilst Historic England Advice Note 7 provides advice on the processes to identify non-designated heritage assets and create 'local lists'. The National Planning Practice Guidance has been clarified to confirm that non-designated heritage assets may be identified through the neighbourhood plan making process (Historic Environment Chapter, paragraph 40).

Policies HTN6 HTN7 and HTN8. We note these policies are included under a section headed 'Natural Environment'. However, the policies are at least as relevant to cultural or historic environment as they are to the natural environment, which could cause confusion or oversight by decision makers applying them. To reflect the way these matters are interrelated we suggest combining the chapter headings for chapters 6 and 7 to a single chapter of "6. Built and Natural Environment".

We hope these comments are of assistance to the examiner but would be pleased to answer any queries that arise from them.

Yours faithfully

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