



Historic England

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11<sup>th</sup> January 2019

Dear Sir or Madam,

### **Notification of Regulation 16 Consultation – Titchfield Neighbourhood Plan**

Thank you for your e-mail of 23<sup>rd</sup> November advising Historic England of the Regulation 16 consultation on the Titchfield Neighbourhood Plan. We are pleased to make the following comments in line with our remit for the historic environment.

We believe that the text in sub-section 1.1 attributed to the Locality Neighbourhood Plans Roadmap is a misquotation and should be *“If successful at referendum, a neighbourhood plan comes into force as part of the development plan for the area alongside the local plan. Local planning authorities and planning inspectors considering planning applications or appeals must make their decisions in accordance with the policies of the development plan, unless material considerations indicate otherwise”*. The critical difference is that material considerations are only relevant to the determination of applications, not whether the neighbourhood plan becomes part of the development plan.

We welcome the statement in paragraph 1.6 that *“The objective of the Plan is to respect and preserve the history of the area for future generations whilst allowing it to continue to develop and grow”*. However, as we noted when commenting at the Reg 14 stage, we prefer “conserve” rather than “preserve” as terminology more consistent with the National Planning Policy Framework and as recognising that change can take place that maintains or enhances the significance and special interest of assets.

We would also like to see “enhance” included in this statement; paragraph 7 of the National Planning Policy Framework (2012) explains the need for the planning system to perform a number of roles, including *“contributing to protecting and enhancing our natural, built and historic environment”* and paragraph 9 notes *“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment”*.

We welcome Chapter 2, the first three paragraphs of Chapter 3 and Appendix 18 on the history of the parish. However, as we previously commented, Chapter 3 is entitled “Titchfield Today”, it would seem to us more appropriate to have the second paragraph



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and perhaps the first sentence of the third paragraph of Chapter 3, which describe the historical development of Titchfield, in Chapter 2.

We are not clear what the vision for the Plan is – the “vision statements” in Chapter 6 are a set of objectives. We previously suggested that the vision should set out how the local community would like Titchfield to be in 2034 – paragraph 29 of the National Planning Policy Framework (2018) states “*Neighbourhood planning gives communities the power to develop a shared vision for their area*”. We hoped that that vision would include something like “*a conserved, enhanced, appreciated and valued historic environment*”.

We are not clear why Table 1 does not include Policies HT1 and HT2, which support the National Planning Policy Framework and the achievement of sustainable development.

We welcome the identification of “*its important historic environment, which includes three of Fareham’s six Scheduled Ancient Monuments*” as one of the “*key factors shaping future development in Titchfield*” in sub-section 7.4.

As we previously noted, Policy UAB.1 is a statement of fact rather than a planning policy in that it does not provide any guidance to a decision maker on how they should react to a development proposal. It does not confirm, therefore, with paragraph 16 of the National Planning Policy Framework (2018) requires Plans to “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”.

We remain not entirely clear whether the Plan is seeking to provide for a particular number of houses. We understand that the identified residual housing need in the parish is 153 dwellings, and sub-section 9.6 indicates that windfall development within the Urban Area Boundary will meet 10% of the identified need during the Plan period. How will the other 90% be met ?

10% of the identified need suggests that it is anticipated that some 15 or so dwellings will be provided through windfall development during the Plan period. However, Policy H.1 does not specify a minimum or maximum figure. We previously suggested that Policy H.1 should be reworded to provide clearer guidance in accordance with the requirement of paragraph 16 of the National Planning Policy Framework e.g.

*“Planning permission will be granted for small-scale infill development (up to ten residential units per development) within the revised Titchfield Urban Area Boundary shown on Map 1 provided that they comply with other policies of the development plan, including those of this Plan”.*

Paragraph 58 of the National Planning Policy Framework (2012) states “*Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics*”.



We do not consider that Policy H.4 is a “comprehensive” policy, and 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 parish or Titchfield village in sub-section 9.8 or in the Appendices.

We are aware of the Titchfield Conservation Area Appraisal and Management Strategy and the Titchfield Abbey Conservation Area Character Assessment, and suggest that both Policy H.4 and sub-section 9.8 should include references to these. However, even between them, they do not cover the whole of the Plan area.

In addition to the requirement of the National Planning Policy Framework 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 character assessment of the parish could be an excellent community project. Further advice on characterisation can be found in the “Understanding Place” series on our website: <https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>. We suggest the use of a toolkit such as the Oxford Character Assessment Toolkit 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>

It would appear logical for a robust and comprehensive design policy to be included within the Built Environment section.

We welcome Chapter 13 on Historic Titchfield. However, 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*”.

Have the Hampshire Historic Environment Record and Hampshire Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance ? 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*”.

We welcome Community Aspiration HT 5.5 regarding the preparation of a list of local non-designated heritage assets. Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. We would be pleased to advise on this potential project and have published a Good Practice Guide for Local Heritage Listing which can be found on our website:



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<http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

We welcome and support Policies HT.1 and HT.2, although we would prefer Policy HT.1 to be entitled “Conserving and Enhancing the Historic Environment” for the reasons we set out earlier in these comments, and are not sure what is meant by the term “Parish Assets” – perhaps this could be omitted to avoid confusion or defined in the Glossary ?

We hope you find these comments helpful. Thank you again for consulting Historic England.

Yours faithfully,



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