



Historic England

By email only to: planningpolicy@fareham.gov.uk

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Date: 26/02/2020

Dear Sir or Madam

Fareham Draft Local Plan 2036 Supplement

Thank you for inviting Historic England to comment on the above document. As the government's adviser on the historic environment, Historic England is keen to ensure that protection of the historic environment is fully considered at all levels and stages of the local planning process.

We note that the current consultation supplements the previous consultation on the Fareham Draft Local Plan 2036, to which we previously provided comments and that this consultation only seeks comments on the current supplement. We are pleased to provide the following specific and general advice.

Specific advice

Rookery Farm

There are a number of grade II listed buildings to the north of the site. Any development on the site should conserve the significance of these assets, which includes the contribution setting makes to the significance of the assets. The policy requirement already included is considered sufficient to address this. In addition, Historic England's mapping identifies archaeological finds, indicating that, as a minimum, a desk-based assessment should be required (in accordance with NPPF paragraph 189), and the council should consider including this as policy requirement.

Strategic Growth Area: North of Downend

The draft policy text includes a requirement for a masterplan and we consider this to be positive. We note the proximity of this growth area to Fort Nelson and a WW2 heavy anti-aircraft gun site (both scheduled). Forts are particularly sensitive due to the desire to preserve their field of fire and to understand their strategic context. The significance of these assets, especially setting, will need to be considered and effectively responded to in the masterplanning process. Again, Historic England's



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mapping identifies archaeological finds, indicating that, as a minimum, a desk-based assessment should also be required in addition.

Strategic Growth Area: South of Fareham

The draft policy text includes a requirement for a masterplan and we consider this to be positive. There are a number of heritage assets located to the west of this area, including a grade II* church. Any development on the site should conserve the significance of these assets, which includes the contribution setting makes to that significance. A policy requirement should be included to that effect, which would ensure it is accounted for the by the subsequent masterplan. The masterplan should also respond to Fort Fareham, its field of fire and strategic context.

General advice

Historic England's published guidance

Historic England has published planning advice which we recommend that you review as part of your plan preparation.

Good practice advice

- The Historic Environment in Local Plans <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- Managing Significance in Decision-Taking in the Historic Environment <https://content.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2.pdf/>
- The Setting of Heritage Assets <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

Historic England advice notes

- Conservation Area Appraisal, Designation and Management <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>
- Making Changes to Heritage Assets <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>
- The Historic Environment and Site Allocations in Local Plans <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- Tall Buildings <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>
- Local Heritage Listing <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
- Sustainability Appraisal and Strategic Environmental Assessment <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>



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All Historic England advice should be read alongside our Conservation Principles, which underpin our work <https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

Evidence base

The evidence base for the plan should be proportionate, comprehensive and robust. Sources include:

- National Heritage List for England www.historicengland.org.uk/the-list/
- Heritage Gateway www.heritagegateway.org.uk
- Historic environment records
- National and local heritage at risk registers www.historicengland.org.uk/advice/heritage-at-risk
- Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)
- Conservation area appraisals and management plans
- Historic characterisation assessments e.g. the extensive urban surveys and historic landscape characterisation programmes or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/
- Environmental capacity studies for historic towns and cities or for historic areas
- Detailed historic characterisation work assessing impact of specific proposals.
- Heritage impact assessments looking into significance and setting
- Green Belt studies
- Visual impact assessments
- Archaeological assessments
- Topic papers
- See also, the baseline information section within sustainability appraisal, below

As set out in GPA1, this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (i.e. the significance) of sites both known and unknown.

Site Allocations

General

Significance is what makes an asset worthy of protection. Significance a collective term for the sum of all the heritage values that can be ascribed to a place. A full appreciation of the significance of a heritage asset is likely to require the skills of an expert. Therefore, simply plotting an asset on a map is unlikely to be sufficient.

Where there is uncertainty about the precise way in which a site could be developed, this can make it difficult to assess the full impact on the historic environment. Supporting information should be sufficient to make an appropriate level of assessment, through the plan-making process. The greater the level of detail in how a site should be developed, the easier it is to assess the impact on the historic



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environment. We encourage the use of detailed sites requirements as part of the allocation policy and where appropriate, development briefs and masterplans. There is a danger to both heritage assets and potential developers of allocating sites without sufficient guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be fully understood and justified as early as reasonably practicable in the plan-making process.

The cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.

Assessing sites

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site makes to the significance of heritage assets, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider how to maximise enhancements and avoid harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPF tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site proposed for allocation, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance any heritage assets that would be affected by the development, including their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question.

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Historic Environment Planning Adviser



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