



Cllr Roger Potter
Bramber Neighbourhood Plan Group
Meadow Edge
The Street
Bramber
West Sussex
BN44 3WE

Direct Dial: -

Our ref: PL00620519
7 November 2019

Dear Cllr Potter

Bramber Neighbourhood Plan Pre-submission Consultation

Thank you for consulting Historic England on the Bramber Neighbourhood Plan Pre-submission version. Historic England are the government's advisors on planning for the historic environment, including the conservation of heritage assets and the championing of good design in historic areas. As such, we have limited our comments to those areas of the plan that relate to our interests.

I am happy to confirm that, without prejudice to comments we may make on individual planning applications we do not have any in-principle objections to the plan's proposals. As such, our comments are either focused on policies or elements that we wish to express our particular support for or areas where we feel that amendments to policy wording could better help to secure the steering groups objectives.

The Vision for the Neighbourhood Plan clearly has the support of the community and therefore conforms with paragraph 29 of the National Planning Policy Framework, which states "*Neighbourhood planning gives communities the power to develop a shared vision for their area*". We welcome the references to the special character and historic environment within the vision for the Parish, however we would normally encourage a more specific reference to heritage assets being conserved, enhanced, better understood and appreciated. This could be carried over into the objectives where you might consider including a more directly worded objective such as "*To sustain and enhance the character and appearance of the Conservation Areas and the significance of the heritage assets of Bramber Parish and their settings*", "significance" in this case being the term used for what is important or valued about a listed building or scheduled monument (the National Planning Policy Framework defines "significance" as "*The value of a heritage asset to this and future generations because of its heritage interest*").

We note from paragraph 5.9 that no site allocations have been made. In the event of any sites being allocated for development in the future we would refer you back to our scoping report response and our advice on site selection and impact assessment,



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particularly when considering an early review of the Neighbourhood Plan.

We welcome inclusion of paragraph 6.1, however we feel this could be expanded to include a more detailed and thorough description of the character and heritage in Bramber Parish in order to underpin the policies of the plan. We recommend you include an overview of the historical development of Bramber as a settlement, and we would also welcome a more detailed reference to the 17 listed buildings in the parish (four Grade I and 13 Grade II) and the Scheduled Monuments as individual heritage assets; particularly those in and around the Built Up Areas as identified in Policy B1 that may be affected by development in the future.

In addition to the designated assets within the parish, you might also consider including a section here that addresses the non-designated assets in the neighbourhood area. 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*”.

The 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*”.

Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are identified by the steering group as at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement.

We would also refer you back to our scoping report response and reiterate the



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following: “The West Sussex Historic Environment Record is the main repository of data on the previously identified areas of archaeological remains in Bramber and should be noted as a source of data in the baseline. Using the Heritage Gateway website we can see that there are 87 records on the HER relating to Bramber Parish. These include such diverse features as from records of excavations, Second World War practices trenches and barbed wire, medieval hearths associated with salt workings to individual Roman coins and the medieval town itself. The NPPF sets out an approach that prioritises the conservation of archaeological remains, with great weight to be given to remains of national importance even where these are not already scheduled monuments.” If you have not already done so, we would recommend that you speak to the staff at West Sussex County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes, and make you aware of any past issues where heritage concerns have affected decisions.

We welcome section 6.2 detailing the character of the development and identifying three distinct character areas in the parish which we consider to be consistent with paragraph 125 of the NPPF: “Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.”

We welcome Policy B7 with the designation of Clays Field as a local Green Space, giving recognition of its significance and detailing its historical associations with Bramber Castle. You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality’s website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/> .

We are pleased to see the inclusion of Policy B9 which identifies locally significant views that contribute to the character and distinctive feel of Bramber Parish, and note that a number of these views relate to the conservation area and heritage assets within the parish. We would encourage you to consider providing a little more information on these views in particular and specifically identifying why and how these views contribute to the significance of these heritage assets as well as allowing





appreciation of heritage assets and the wider historic environment. Making reference to the need to protect or enhance the conservation area or heritage assets in the policy could help to give it additional weight.

Finally, we would like to stress that this advice is based on the information provided by Bramber Parish Council in your correspondence of September 2019. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

We hope these comments are of assistance to the steering group but would be pleased to answer any queries relating to them or to provide further information if required.

Yours sincerely,

Hannah Blackmore
Business Officer

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Checked by Rob Lloyd Sweet- Historic Places Advisor

cc:

