



Historic England

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By email only

Our ref: 2015.07.23
Your ref: Balcombe NP
Pre-
submission
version RLS
Comments
Telephone 01483 252028
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23rd July 2015

To whom it may concern:

Re: Balcombe Neighbourhood Plan Pre-submission Version Consultation

Thank you for consulting Historic England on the Pre-submission draft of the Balcombe Neighbourhood Plan pre-submission version. Neighbourhood Planning is principally an opportunity for the community to determine their own agenda for planning, albeit within the parameters set by the test of the basic conditions. As such, Historic England's remit is confined to providing advice on the means of achieving the objectives for the historic environment that the community themselves have determine, as well as ensuring the plan meets the basic requirements with regard to designated heritage assets, acting as a champion for the historic environment and promoting good practice in planning for the historic environment. We have published guidance on considering the historic environment in Neighbourhood plans which you can view online at: <https://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

Turning to the detail of the pre-submission version of the Neighbourhood Plan and its supporting documents the plan provides references to the Area of Outstanding Natural Beauty as a requirement for development to protect. However, several policies that have more direct consequences for the conservation area could be improved by stating the need to preserve or enhance its character or appearance. Whilst the requirement to protect or enhance the conservation area is set out in the Local Plan and Emerging Local Plan, the Neighbourhood Plan policies do create an expectation that development will occur in these locations and it would be sensible to guide development proposals in these locations to ensure the conservation area is given early consideration. We note the plan already does do this for the development site at Balcombe House Gardens. We have suggested a number of additions to the policies set out to help highlight the need to consider impacts on the conservation area and other heritage assets



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Policy 2: Without prejudice to comments we may wish to make on future planning applications affecting these sites, we support the requirement for development of land at Balcombe House Gardens and Rectory Gardens to sustain the significance of the setting of Balcombe House and the Conservation Area, including the tree line on Haywards Heath Road set out in Policy 2 as a means of providing a local level of policy that supports the existing and emerging Local Plan policies.

Policy 3. We express our support for the direct reference to the Village Design Brief (we suggest ensuring the name of the document and the wording of the policy match to avoid any potential for confusion) as a document that should be taken into consideration in preparing development proposals. To ensure this policy supports the preservation or enhancement of the Balcombe Conservation Area in addition to the Area of Outstanding Natural Beauty we suggest the following addition to the first paragraph:

“The scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, will be required to reflect the architectural and historic character and scale of the surrounding buildings and to avoid any significant detrimental effect on the landscape and natural beauty of the High Weald Area of Outstanding Natural Beauty **and the significance and character or appearance of the Balcombe Conservation Area.**”

Policy 5. Given that the village centre lies at the heart of the Balcombe Conservation Area we would recommend the addition to this policy of a requirement that development in the village centre should also protect or enhance the character or appearance of the conservation area and listed buildings. As such, we recommend the following addition to this policy:

“Proposals for a change of use of a building or for the development of land within the village centre for commercial use will be supported, provided they accord with the design policies of the Neighbourhood Plan and Mid Sussex development plan and specifically they will conserve and enhance the landscape and natural beauty of the High Weald Area of Outstanding Natural Beauty, **the character or appearance of the Balcombe Conservation Area and Listed Buildings in the Village Centre.**”

The Parish Design Guide and the Neighbourhood Plan

Historic England supports the use of the Parish Design Guide both as a means of providing guidance to prospective developers and as a source of evidence for the character and appearance of the village that can inform the policies of the plan. The Parish Design Guide provides several important considerations that do not appear to be given a direct policy link in the Neighbourhood Plan but that the plan might helpfully provide policy guidance on to ensure it adds a local dimension to planning considerations.

To ensure the presumption of retaining and reusing buildings (Parish Design Guide page 26) is given weight in planning decisions this should be given support through a



direct policy in the Neighbourhood Plan either encouraging this form of development or resisting developments that would result in the loss of historic buildings in particular. This might refer to the need to retain buildings that make a positive contribution to the special historic or architectural interest of the conservation area in particular to give the policy additional weight. Suitable policy wording as an addition to Policy 3 might be:

“Proposals that involve the change of use of historic buildings within the settlement boundary for housing as 1, 2 or 3 bedroom units, including buildings judged to make a positive contribution to the special historic or architectural interest or character and appearance of the conservation area, that sustain the significance of these buildings and their settings and their contribution to the conservation area, that provide a viable future use of the structures, will be supported.”

Supportive text might include the statement:

“The village, and conservation area in particular, contain a number of historic buildings that may no longer serve their historic function due to the changing economy of the village. Nevertheless many of these contribute to the village’s historic character and interest. Given the identified need for smaller dwellings within the Parish, there is a high potential for conversion of such buildings to provide housing, whilst providing a viable future use for these structures that sustains the positive contribution they make to the historic environment of the village and the character and appearance of the conservation area. The Parish Design Guide provides guidance for applicants on the design of changes that may be required to reuse an historic building, whilst further guidance is available from the District Council’s planning department and Historic England’s website. It will be up to applicants to determine in consultation with the District Council, whether a building is considered to be an historic building.”

The Parish Design Guide highlights the vulnerability of views into the village from proposals for larger buildings and sets a requirement to provide accurate visual representations of new development that would be prominent to inform development decisions. This requirement would also be more clearly set out as a policy requirement specifying the type of information required to support planning applications with a statement of the factors that will influence whether visually prominent development will be considered suitable or not. We would recommend inserting the wording highlighted in bold on page 25 of the Parish Design Guide as an additional policy in the Neighbourhood Plan with the following addition:

Policy X. Where a building will command a view, and thus be visible from the surrounding countryside, an application must be accompanied by accurate drawings to indicate the extent of visibility from key locations near and far **and the expected appearance of the development within these views. The suitability of the**

design response to impacts on views will be determined based on the following criteria:

- The prominence of development in the view;
- The permanence of any impact given the potential of landscaping to reduce prominence of new buildings over time;
- The impact of the choice of materials, form, scale, massing and details of new development on the character of the view;
- Any negative impacts or harm on the character or appearance of the conservation area or the landscape and natural beauty of the High Weald Area of Outstanding Natural Beauty resulting from the development, as well as measures taken to avoid or minimise such harm;
- Any positive impacts resulting from the development on the character or appearance of the conservation area or the landscape and natural beauty of the High Weald Area of Outstanding Natural Beauty;
- The public benefits that will be the direct result of the proposed development, including the delivery of the vision set out within this Neighbourhood Plan.

Applicants will be expected to agree with the District Council where developments are likely to be considered as commanding a view and to agree a suitable number of viewpoints in the wider landscapes from which the impact of development on views can be assessed.”

Suitable supporting text might including the following statement:

“The Parish Design Guide has identified the rolling topography of the village and mixed open or wooded landscape as requiring a particular approach to consideration of the response of development to its context and prominence in views from the wider landscape. This may be of particular importance where visually prominent development could affect views across the Area of Outstanding Natural Beauty or of the Balcombe Conservation Area from the wider landscape. Providing accurate representations of how development will appear in these views is important to understanding its potential impact and determining its suitability.

In considering how development would affect these landscapes and heritage assets the Council will consider not only how prominent it is in the view but how the choices of design have sought to contribute to the character of the landscape and avoid negative impacts, as well as how development would help to deliver the vision of the Neighbourhood Plan. In determining the location and number of points from which the impacts on views should be assessed the Council will have regard to the scale of development and its potential to affect the views. ”



We note that the Parish Design Guide does not mention the conservation area, despite the coverage of a large part of the built-up area of the village by the designated area. The analysis of the history of the settlement, and of its architectural and more general character and appearance provide a large part of the information that would normally be presented in a conservation area appraisal. By including a section that sets out as a series of bullet points what the special historic or architectural interest of the conservation area is and, separately, which of its features are considered desirable to preserve or enhance, this could be presented as a combined Conservation Area Appraisal and Design Guide that add an additional layer of weight to the document (Conservation Area Appraisals that have undergone public consultation or been prepared by the community are attributed considerable weight by the Planning inspectorate). We would be please to provide more guidance on taking such an opportunity in collaboration with the District Council if this can be of assistance. In the meanwhile it may help to consult Historic England's guidance on preparing Conservation Area Appraisals, which can be downloaded at: <http://historicengland.org.uk/images-books/publications/understanding-place-conservation-area/> .

We hope these comments are of assistance to the Parish Council in developing the Neighbourhood Plan and look forward to seeing it at the Submission stage if not before. Please feel free to contact me if you do have any queries relating to our comments or would like additional guidance or information to support you in addressing the historic environment in the Neighbourhood Plan.

Yours faithfully

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