

South Gloucestershire Core Strategy Examination – Action List

Note to the Inspector regarding issues raised relating to Matter 15 – Environment & Heritage

- 1) Following consideration of participants' responses to the Inspector's Matters and Questions, the Council suggested a number of amendments to Policy CS9. These changes are suggested in order to better reflect the requirements of the National Planning Policy Framework (NPPF) and, in doing so, to narrow the areas of difference between participants and the Council.
- 2) The main area of difference was with regard to the Council's approach to the historic environment/heritage assets (set out in Policy CS9) and, with this in mind, officers discussed the suggested amendments with English Heritage (EH). Following these discussions, EH have provided a letter setting out their support for the changes suggested to Policy CS9 ([Examination Library ref. SS24](#)).
- 3) The suggested amendments were put before both the Inspector and the relevant participants prior to the Hearing Session, in order that they could be considered and used as a starting point for further discussion.
- 4) During the Hearing Session it was agreed that the amendments suggested addressed a number of the concerns raised initially but a number of further issues were raised by consultants acting on behalf of Dominic Lawson Bespoke Planning. These issues related to:
 1. a view that the wording of Policy CS9 was too strong and that further amendments should be made to require an assessment of the desirability of conserving a particular heritage asset;
 2. the need to make further distinction between designated and non-designated heritage assets; and,
 3. whether reference should be made to an evidence base (as is suggested in NPPF Para 139); and,
 4. whether reference made to South Gloucestershire Local Plan policies in Paragraph 8.4 should be removed as some of these policies are out of date.

These issues have been discussed and are addressed below.

- 5) The Council is of the opinion that a change to the wording of criterion 1 to include the need to assess the desirability of conserving heritage assets (point 1 under Para 4 above) would represent a weakening of the policy, the wording of which has been agreed with the relevant statutory body. As is set out in the Core Strategy, Policy CS9 sets out the 'general approach to...heritage assets', to 'conserve, respect and enhance in a manner appropriate to their significance'. This view was set out in the Hearing Session. Furthermore, this issue is addressed through the NPPF (Paragraph 131) which requires that 'the desirability of sustaining and enhancing the significance of heritage assets' be taken account of in the process of determining planning applications. For the reasons set out above, no further change is proposed to Policy CS9.
- 6) With regard to points 2 and 3 (under Para 4 above), a number of further minor wording changes to the supporting text are suggested to the Inspector as a result of the Hearing Session. The amended text (new additions/changes since Hearing Session in **red text**) would therefore read:

8.7 South Gloucestershire has an important legacy of heritage and cultural assets, including over 2000 listed buildings, approximately 1500 locally listed buildings, 301 conservation areas, 8 registered historic parks and gardens, and 357 scheduled monuments. and There are a wide range of undesignated historic buildings, archaeological sites and remains, and historic parks and gardens as well as places, areas and landscapes of historic interest. Information about heritage assets can be found in the South Gloucestershire Historic Environment Register (HER). These assets make a significant contribution to the identity of the locality in which they are set, helping to create a sense of place. Applications for development which affect heritage assets and their settings directly or indirectly will need to describe the nature of the significance of the assets affected, and set out how development will maintain and enhance heritage assets and their settings in a manner appropriate to that significance. New development should seek opportunities to draw on the historic environment in order to maintain and enhance local character and distinctiveness.

8.7a In order to ensure that heritage assets are properly recognised and protected, the Council will maintain or provide access to an up to date Historic Environment Record and periodically appraise heritage assets including Conservation Areas, and its list of locally listed buildings, in order to ensure that these designated heritage assets are properly recognised and protected. The Council will periodically assess its buildings heritage assets at risk register in order to identify heritage assets at risk through neglect or decay. Where heritage assets are deemed by the Council to be at risk, the Council will support the submission of enabling development proposals accompanied by detailed financial appraisals in accordance with English Heritage guidance, 'Enabling Development and the Conservation of Significant Places' (English Heritage 2008), which aims to balance any potential harm to the heritage values of the place and its setting and is the minimum necessary to secure the future of the place with the public benefits of development. assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. Applications for enabling development relating to a heritage asset should be in accordance with English Heritage guidance, 'Enabling Development and the Conservation of Significant Places' (English Heritage 2008).

7) With reference to point 4 (above), the Council does not feel it appropriate to remove the reference within Paragraph 8.4 to the policies in Chapter 4 of the South Gloucestershire Local Plan (SGLP). This reference refers to the whole range of Environmental policies and is not restricted to those which relate to heritage assets/historic environment. Furthermore, the 'saved' policies in SGLP (see [Examination Library ref LR3](#)) form part of the development plan until such time that they are superseded by the detailed policies in the Policies, Sites and Places DPD. In the mean time, if there are areas of conflict between SGLP policy and that contained within the National Planning Policy Framework, the NPPF would supersede SGLP policy. With this in mind, the following minor textual change is proposed to Paragraph 8.4.

8.4 This policy sets out the general approach to environmental resources and heritage assets in South Gloucestershire and should be read in association with the more detailed environmental policies in Chapter 4 (Environment) of the South Gloucestershire Local Plan (SGLP) until these policies are replaced by the Policies, Sites and Places DPD. This policy also links with Policies CS2 (Green Infrastructure) and CS1 (High Quality Design) in this Core Strategy.