



Historic England

Dear Sir or Madam,

Summertown and St Margaret's Neighbourhood Plan

Thank you for consulting Historic England on the submission version of the Summertown and St Margaret's Neighbourhood Plan. As the Government's adviser on planning for the historic environment we are pleased to promote planning for the conservation of heritage assets and to champion good design. As such we have limited our consideration of the plan to those areas falling within our interest.

We are pleased to confirm that we have no concerns with the plan's proposals. As such our comments are focused on ensuring the Plan's policies achieve the objectives set out and are both robustly worded and adequately evidenced.

Policy HOS6 Character Assessment: Historic England strongly supports the use of character assessment as a means of defining the valued features of local character that deserve conservation, as well as highlighting issues in urban design terms that require attention. We recommend making a number of changes to this policy but otherwise strongly support its inclusion in the plan and recognise the considerable effort that has gone into assembling the associated evidence base.

Firstly we recommend the title of the policy is changed to express the subject to which it is intended to relate in planning decisions: Local Character and Distinctiveness.

The policy should not elevate the character assessments to the status of a policy in their own right as they are evidence to support the plan rather than part of it, but it should set out a principle for determining applications that makes clear use of the evidence and advice set out without preventing the option for innovative design.



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We recommend rephrasing the policy to require developers to seek to protect and respond positively to the valued features of local character, which are defined in the character assessments included in the evidence base of the neighbourhood plan. We would recommend a policy wording such as:

“Policy HOS6 Local Character and Distinctiveness

“Proposed development within identified Character Areas will be supported where it responds positively to local character and distinctiveness. Proposals should demonstrate that the design and use of development will protect those features identified as making a positive contribution to the character of the area in the character assessment prepared for this plan and clearly show how the design guidance has been taken into account. “Development proposals that would be harmful to the character of the area as defined in the character assessment will be resisted.”

HOS7 Design: As previously commented, bullet point a) is left hanging as it is not clear; subject to the scale, density, layout, orientation and massing being what?.. Ideally we would expect this to conclude “... of the proposal positively responding to and protecting the valued features of local character as described in the relevant character assessment”.

Between these two policies we consider that the requirement of paragraph 58 of the National Planning Policy Framework that “...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” is satisfied, with the Character Assessments providing the required “understanding and evaluation”.

Our only other comment is that we would welcome a description of the historic environment of the Plan area; Policy HOS7 refers to “local heritage” and paragraph 35 refers to “historic heritage”, but there is no explanation of what that heritage is.

The 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”.

We hope you find these comments helpful, but if you have any queries please do not hesitate to contact me.