Local Plan Part 2: Sites and Development Management
Main Modifications and draft Mitigation Strategy
Representation Form

Name of the DPD to which this representation relates:
New Forest District (outside the National Park)
Local Plan Part 2: Sites and Development Management

Please return to New Forest District Council by 15 November 2013

Please note that your representation will be made available for public viewing at Appletree Court, Lyndhurst and via the Council’s website. (Personal information such as signatures and telephone numbers will not be published on the website).

There are two sections –
Part A – Personal Details
Part B – Your representation(s).

Please fill in Part A, and a separate Part B for each representation you wish to make.

<table>
<thead>
<tr>
<th>Part A</th>
<th>Part B</th>
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</table>
| **1. Personal Details** **Mandatory field**
  
  **If an agent is appointed, please complete the Title, Name and Organisation boxes for your client in 1, plus the full contact details of the agent in 2.**
  
  If you have previously made representations on this Plan, please give your representee ref. here: 381zb |

<table>
<thead>
<tr>
<th>Title</th>
<th>Agent’s Details (if applicable)</th>
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<tbody>
<tr>
<td>Mr</td>
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<tr>
<td>Mrs</td>
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<tr>
<td>Miss</td>
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<tr>
<td>Ms</td>
<td></td>
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<tr>
<td>Dr</td>
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<table>
<thead>
<tr>
<th>First Name</th>
<th>Job Title</th>
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<tr>
<td>MARTIN</td>
<td>HISTORIC ENVIRONMENT PLANNING ADVISER</td>
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<table>
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<tr>
<th>Last Name*</th>
<th>Organisation</th>
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<tr>
<td>SMALL</td>
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<tr>
<th>Address Line 1*</th>
<th>2. Agent’s Details (if applicable)</th>
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<tr>
<td>EASTGATE COURT</td>
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<table>
<thead>
<tr>
<th>Line 2</th>
<th>Line 3</th>
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<tr>
<td>195-205, HIGH STREET</td>
<td>GUILDFORD</td>
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<table>
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<tr>
<th>Line 4</th>
<th>Post Code*</th>
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<tr>
<td>SURREY</td>
<td>GU1 3EH</td>
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<table>
<thead>
<tr>
<th>Telephone Number</th>
<th>E-mail Address</th>
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<tbody>
<tr>
<td>01483 252040</td>
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</table>
Local Plan Part 2: Sites and Development Management
Main Modifications Representation Form

Ref: 381MM_a
(For official use only)

Part B – Please use a separate sheet for each representation
(Part A MUST also be completed)

Name or Organisation: ENGLISH HERITAGE

3. To which matter does this representation relate?

i. Main Modification to the Local Plan Part 2: Sites and Development Management

<table>
<thead>
<tr>
<th>Main Modification Ref. (i.e. MM1)</th>
<th>MM5</th>
<th>Local Plan Part 2: Para. or Policy number</th>
<th>DM1</th>
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<tbody>
<tr>
<td>MM5</td>
<td></td>
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</tr>
</tbody>
</table>

OR

ii. The draft Mitigation Strategy Supplementary Planning Document

Draft Mitigation Strategy
Paragraph No. or Project Reference

OR

iii. If you wish to comment on the Infrastructure Delivery Plan tick here.

If commenting on a modification to the Local Plan Part 2 (including the revised Habitats Regulations Assessment and Sustainability Appraisal) please fill in sections 4 – 9.
If commenting on the draft Mitigation Strategy, please fill in section 10.
If commenting on the Infrastructure Delivery Plan, please fill in section 11.

4. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is:

4.(1) Legally compliant Yes [√] No [ ]
4.(2) Sound* Yes [√] No [ ]

(* The considerations in relation to the DPD being ‘Sound’ are explained in the National Planning Policy Framework)

If you have entered No to 4.(2), please continue to Qu 5. In all other circumstances, please go to Qu 6.

5. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy
6. Please give details of why you consider the Local Plan Part 2 (as proposed to be modified by the Main Modifications) is not legally compliant or is unsound on this matter. If you wish to support the legal compliance or soundness of the Local Plan Part 2: Sites and Development Management, please also use this box to set out your comments.

English Heritage welcomes and supports Main Modification 5, which reflects the changes to Policy DM1 agreed by English Heritage and the District Council as set out in our Statement of Common Ground.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound on this matter, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of the relevant policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change to the Local Plan Part 2, do you consider it necessary to participate at the oral part of the examination?

√ No, I do not wish to participate at the oral examination

☐ Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Please note: whilst English Heritage does not consider it necessary for it to participate in the oral part of the Examination, we would be happy to do so should the Council and/or the Inspector consider it would be helpful).

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.
Part B – Please use a separate sheet for each representation

(\textit{Part A MUST also be completed})

**Name or Organisation** : ENGLISH HERITAGE

3. \textbf{To which matter does this representation relate?}

i. Main Modification to the Local Plan Part 2: Sites and Development Management

<table>
<thead>
<tr>
<th>Main Modification Ref. (i.e. MM1)</th>
<th>MM6</th>
<th>Local Plan Part 2: Para. or Policy number</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>2.7 and 2.8</td>
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OR

ii. The draft Mitigation Strategy Supplementary Planning Document

<table>
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<th>Draft Mitigation Strategy Paragraph No. or Project Reference</th>
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OR

iii. If you wish to comment on the Infrastructure Delivery Plan tick here.

If commenting on a modification to the Local Plan Part 2 (including the revised Habitats Regulations Assessment and Sustainability Appraisal) please fill in sections 4 – 9. If commenting on the draft Mitigation Strategy, please fill in section 10. If commenting on the Infrastructure Delivery Plan, please fill in section 11.

4. **On this matter, do you consider the Local Plan Part 2: Sites and Development Management is :**

4.(1) Legally compliant

Yes [✓] No

4.(2) Sound* Yes [✓] No

(* The considerations in relation to the DPD being ‘Sound’ are explained in the National Planning Policy Framework)

If you have entered No to 4.(2), please continue to Qu 5. In all other circumstances, please go to Qu 6.

5. **On this matter, do you consider the Local Plan Part 2: Sites and Development Management is unsound because it is not:**

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the Local Plan Part 2 (as proposed to be modified by the Main Modifications) is not legally compliant or is unsound on this matter.
If you wish to support the legal compliance or soundness of the Local Plan Part 2: Sites and Development Management, please also use this box to set out your comments.

English Heritage welcomes and supports Main Modification 6, which reflects the changes to paragraphs 2.7 and 2.8 agreed by English Heritage and the District Council as set out in our Statement of Common Ground.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound on this matter, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of the relevant policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change to the Local Plan Part 2, do you consider it necessary to participate at the oral part of the examination?

| No, I do not wish to participate at the oral examination |
| Yes, I wish to participate at the oral examination |

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Please note: whilst English Heritage does not consider it necessary for it to participate in the oral part of the Examination, we would be happy to do so should the Council and/or the Inspector consider it would be helpful).

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.
10. Please state here your comments on the draft Mitigation Strategy.

Although not directly relevant to the draft Mitigation Strategy, the proposed Green Infrastructure Strategy should recognise in due course that the historic environment and heritage assets can make a valuable contribution to green infrastructure networks and its wider functions, as for example in providing leisure and recreation opportunities, encouraging walking and cycling and strengthening local character. Historic places such as historic parks and gardens, archaeological sites, the grounds of historic buildings and green spaces within conservation areas can form part of a green infrastructure network as well as underpin the character and distinctiveness of an area and its sense of place. Other heritage assets can also offer a range of opportunities such as canal networks and churchyards and the wider countryside including networks of ‘green-lanes’, common land and historic parkland.
The Infrastructure Delivery Plan should recognise and identify the relationship between heritage assets and infrastructure, as explained below.

The National Planning Policy Framework endorses the role of the historic environment in sustainable development. It notes that pursuing sustainable development involves seeking positive improvements in the quality of the historic environment. There can often be a range of ways in which the historic environment can contribute to and benefit from the range of infrastructure and investment needs that are required for sustainable development and communities.

Heritage assets can help to deliver a range of infrastructure needs associated with housing, economic development and sustainable transport networks.

Historic buildings within or in the vicinity of a settlement may offer opportunities for residential reuse, including for affordable housing [see Affordable Rural Housing and the Historic Environment, http://www.helm.org.uk/server/show/nav.00h015005004 ].

Heritage assets can be economic assets in their own right and support the regeneration of areas as well as the tourism economy. For example, the adaptive reuse and repair of historic buildings may offer opportunities for business or employment use. More generally the investment in heritage assets (e.g. buildings at risk), and the wider historic character of a place (e.g. conservation areas at risk) may also serve to strengthen and reinforce the attractiveness of a place to retain and attract economic development and to stimulate and support the area’s tourism offer. Investment could be directed to establishing or extending area-based schemes aimed at regenerating valued historic townscapes, as exemplified by Townscape Heritage Initiatives funded through the HLF. Specific opportunities may also exist to further develop the tourism offer of established heritage assets open to the public and their links to nearby settlements.

The following publications illustrate practical examples of where the protection and adaptation of historic places through active management (constructive conservation) has delivered social and economic benefits:

Improvements to the public realm in town and village centres can help encourage walking and cycling and support the delivery of sustainable transport objectives. They can also support the delivery of the objectives for the historic environment through helping to deliver conservation area management plans and tackling issues related to conservation areas being identified as at risk. Improvements could include promoting community based de-cluttering audits and the better coordination of signage and street furniture as promoted through English Heritage’s Streets for All programme. Improvements in the overall quality, character and indeed functioning of areas can also contribute to wider policy aims linked to tourism, the economy and the built environment. Practical guidance on community audits and managing, designing and maintaining the public realm is available at: http://www.helm.org.uk/server/show/nav.19637.

In certain cases the direct investment in a heritage asset might be required for supporting the development of an area. For example, this could include investment in the improvement and or maintenance of a historic bridge where it is part of the transport infrastructure for the planned development.

Historic buildings, including places of worship, can accommodate many social and community services and activities as well as represent a focus for the community in their own right. Investment in their continued or improved maintenance could be warranted in supporting and extending the capacity of existing infrastructure. Promoting the adaptive reuse of a vacant or underused building or facilitating the multiple-use of existing buildings for a wider range of community services might also offer the opportunity to support the repair and maintenance of historic buildings, particularly where identified nationally or locally as a building at risk.

Practical examples of how heritage assets can be adapted to realise their potential as social and economic assets are available via the English Heritage website: http://www.english-heritage.org.uk/professional/advice/conservation-principles/constructive-conservation/. Specific guidance on caring for Places of Worship and new uses for former places of worship is available at: http://www.english-heritage.org.uk/publications/caring-for-places-of-worship/; and http://www.english-heritage.org.uk/publications/new-uses-former-places-of-worship/.

The community transfer of assets may also be an option for delivering infrastructure and the sustainable management of a heritage asset. Guidance for local authorities, public sector bodies and community groups on the transfer the ownership and management of historic buildings, monuments or landscapes is available on the English Heritage website (Pillars of the Community: The Transfer of Local Authority Heritage Assets, 2011): http://www.english-heritage.org.uk/publications/pillars-of-the-community-the-transfer-of-local-authority-heritage-assets/.

In supporting access to green space and encouraging walking and cycling, extensions to the public rights of way network can include improving access to heritage assets and their improved interpretation and enjoyment. The provision of open space might also be linked to improving public access to historic landscapes in the vicinity of a settlement.

Social and community infrastructure may also include cultural facilities such as a local museum. Investment may offer opportunities to widen and improve its use by existing and new communities as well as support the tourism economy.

(See also comments relating to Green Infrastructure and the historic environment under the Draft Mitigation Strategy above).