

From: Lloyd Sweet, Robert <Robert.LloydSweet@HistoricEngland.org.uk>

Sent: 11 August 2021 11:34

To: Stephanie Bennett <clerk@iversparishcouncil.gov.uk>

Subject: Re: The Ivers Regulation 14 Consultation

Dear Stephanie

Please accept my sincere apologies for the delay in responding to this consultation which has resulted from failure to log the original invitation to our casework management system. Could you please update our contact details for consultations to e-seast@historicengland.org.uk, which will help to ensure that all correspondence is logged to this case?

I'm happy to say that we have no objections to make to any of the proposals in the plan and as such our comments are limited to those areas where we feel that plan policies could be enhanced to provide greater clarity or robustness.

Policy IV2, to ensure that it is clear the policy is focused on retaining the features identified we suggest a minor amendment to the first paragraph of this policy to read:

*A. Development proposals in Iver Heath must demonstrate that they have had full regard to the relevant Townscape Character Study guidelines and, **where relevant, to preserving the following design features that are considered essential to the significance of the village character:***

The final paragraph needs a minor amendment for clarity and to demonstrate that this is considered to be a form of non-designated heritage asset to which national policy should be applied:

*B. The Neighbourhood Plan identifies an Area of Special Character comprising The Parkway, Longstone Road, Church Road (north side) and Ashford Road, as shown on the Policies Map, **which is considered to be a non-designated heritage asset identified by the community.** Development proposals **that have effects for this area** should demonstrate that they have had full regard to the characteristics that contribute to ~~the~~ **its** significance ~~of~~, **including the contribution of its local architectural and historic interest as set out in the design code at Appendix B.***

Policy IV4 We recommend making a similar amendment to the final paragraph of this policy to clearly identify the Area of Special Character as a non-designated heritage asset identified through the planning process.

Policy IV5

The Neighbourhood Plan cannot add Local Heritage Assets to the list identified through the Local plan. It can, however, establish a separate list of equal weight with

it's own policy, either borrowing the wording from the local plan or using its own wording. A suitable wording might be:

"The Neighbourhood Plan identifies the buildings and structures set out in Appendix D as non-designated heritage assets that have a significance for their heritage interests within the neighbourhood plan area that merits consideration in planning decisions. Proposals that affect these heritage assets should include sufficient detail on the significance of these assets to identify the impact of proposals on their conservation and should demonstrate that measures have been taken, where relevant, to avoid or minimise any conflict between the proposals and the conservation of the heritage asset. Any harm that would result to the asset must be robustly justified on the basis of public benefits that clearly outweighs the loss to the heritage asset's significance and that could not otherwise be delivered. Proposals that would result in the demolition of an asset will be required to ensure that demolition does not take place until a contract for the permitted replacement development has been secured."

Policy IV13

We note and support the inclusion of identification of heritage features as a material consideration in this policy.

Appendix D

Looking at the tabulated detail on local heritage assets, we advise looking carefully at the detail provided in the Special Local Interest column to consider whether, in each case this adequately makes the case for their inclusion. As an example, the detail for Warren House, Church Road would be inconclusive in our opinion at present. It would help to determine a set of criteria for which our published advice on local listing may provide you with some useful headings <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>. A useful example of setting out how each asset meets these criteria is provided by Fleet Neighbourhood plan which you may also wish to refer to: https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Neighbourhood_planning/APPENDIX%203%20-%20Buildings%20of%20Heritage%20and%20Townscape%20Value.pdf.

Without clearly demonstrating that these features merit consideration in planning the list would be highly open to challenge. Given the limits on the protection that this form of heritage designation can provide, it is particularly important to identify at an early stage in decision making what it is about each heritage asset that is considered desirable to sustain or enhance. Providing this detail will make the list more effective as a tool for planning.

We hope these comments are still of value to the steering group but would be pleased to answer any queries relating to them

Yours sincerely

Robert Lloyd-Sweet

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[Appendix 3 Buildings of Heritage and Townscape Value](#)

Fleet Neighbourhood Plan Appendix - Buildings of Heritage and Townscape Value 3 August 2018

1 to 25 Dunmow Hill GU51 3AN HF, PD, AV, LS, SDF

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[Local Heritage Listing: Identifying and Conserving Local Heritage | Historic England - Historic England - Championing England's heritage | Historic England](#)

Local heritage lists are one way in which local heritage – buildings, monuments, sites, places, areas, historic parks and gardens or other designed landscapes – can be formally identified, as part of the wider range of designation, so that their significance can be taken into account in planning applications affecting the building or site or its setting.

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