

Planning Policy Team
Wycombe District Council
Council Office
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High Wycombe
Bucks HP11 1BB.

Our ref: HD/P5136

Your ref:

Telephone

Fax

12th October 2017

Dear Sir or Madam,

Notification of consultation - Longwick-cum-Ilmer Neighbourhood Plan

Thank you for your e-mail of 25th August 2017 advising Historic England of the consultation on the Submitted Longwick-cum-Ilmer Neighbourhood Plan. We are aware that the formal consultation period has ended and we apologise for not having submitted these comments before the deadline, a result of annual leave and loss of a member of staff, but hope that you will still pass them to the Examiner, and that he/she may still take them into account.

Historic England welcomes the description of the history of the Parish in sub-section 3.2, which we consider gives a good overview of the historical development of the settlements, and the acknowledgement of the 35 listed buildings and structures in the parish in sub-section 3.3. We also welcome the reference to the grade II* listed Waldrige Manor in the adjacent parish but close to the parish boundary in sub-section 3.2, to the Archaeological Notification Sites in sub-section 2.3 and to the conservation areas in the parish in sub-sections 3.2.3.3 and 3.4.

However, it would be helpful to identify when the conservation areas were designated. Have any buildings, structures or features of local interest been identified outside the Conservation Areas? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity.

We suggest there should be a greater reference to any non-scheduled archaeological remains, information on which is available from the Buckinghamshire Historic Environment Record, and we would welcome a reference to the Buckinghamshire Historic Landscape Characterisation. (The National Planning Practice Guidance states "*...where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of [archaeological interest](#) to guide decisions.*")



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In sub-section 3.5, Aspect 4b) refers to the character of new development, but has any character assessment been undertaken of the parish as a whole? Historic England considers that Neighbourhood Development Plans should therefore be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. A characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

Paragraph 58 of the National Planning Policy Framework states "...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." We note that the Plan does not contain any policies relating to the design or quality of new development.

Historic England welcomes the 9th bullet point in sub-section 5.1 "Vision for Longwick-cum-Ilmer Parish in 2033" and Objectives 6 and 7 in sub-section 5.2, but we would still like to have seen a specific objective for the conservation and enhancement of the historic environment.

According to our records, none of the allocated sites identified in Policy A2 contain any designated heritage assets, although site L5 is potentially within the setting of the three grade II listed structures at Red House Farm and site L6 is within the setting of the grade II listed Anderdons Farmhouse, Anderdons Farm Cottage and Barn to the west of the cottage. With the requirements for landscaped boundaries in Policies L5 and L6, we consider that the impact on the setting and therefore significance of these listed buildings would be acceptable.

However, the Buckinghamshire Historic Environment Record and Historic Landscape Characterisation should be consulted for any references to non-designated archaeological remains on all of the sites (we note that the Sustainability Appraisal identifies a minor negative impact for the development of site L4 because of the possible impact on local heritage interests -historic farmstead. We therefore welcome criterion 16 of Policies L4a and 4b although would have liked to see an additional criterion: "*Respects the significance of the locally important XXX farmstead*").

(We should make it clear that these comments are based solely on a desk-based assessment: we have not visited the proposed sites at this stage. Our comments are without prejudice to any comments we may wish to make on any future applications for the development of any of these sites, should they be taken forward).

Historic England welcomes the recognition of the contribution of the Owlswick village green to the conservation area and setting of listed buildings around it in the justification for Policy A4.

In summary, Historic England considers that the Longwick-cum-Ilmer Neighbourhood Plan satisfies the basic conditions, with the exception of its failure to include *robust and comprehensive policies that set out the quality of development that will be expected for the area* in accordance with paragraph 58 of the National Planning Policy Framework.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting Historic England.

Yours sincerely,



Martin Small
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)



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