



Historic England

By email only to: [REDACTED]

Our ref: [REDACTED]

Your ref Arches Chatham Neighbourhood Plan

Main: 020 7973 3700

Date: 11/05/2023

Dear Sir or Madam

Arches Chatham Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to previous comments submitted at Regulation 14 stage, (which we have attached in terms of completeness) and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Yours sincerely

[REDACTED]



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Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





ACNF Secretary,
Arches Local,
71a Pentagon Shopping Centre,
High Street, Chatham
ME4 4HY

Our ref: [REDACTED]

[REDACTED]
by email only

17 June 2022

To whom it may concern:

Arches 'Chatham' Neighbourhood Plan – Regulation 14 Consultation

Thank you for consulting Historic England on the amended pre-submission version of the Arches 'Chatham' Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of the neighbourhood plan area features throughout. In particular, we welcome the reference to Brompton Lines Conservation Area and the listed buildings of the Arches Neighbourhood in Chapter 1.

We are pleased that the protection and enhancement of heritage assets has been added as one of the objectives of the plan in response to our previous comments. This objective will guide the delivery of heritage policies included in the plan and will ensure that they are robustly justified.

We support Policy E3 on retail frontages and the reference to the shopfront design guide annexed to the plan.

We support Policy HO2 on beautiful design and are pleased to see the incorporation of a design code as one of the tools that will be applied by the neighbourhood plan to increase the speed of decision making and to secure an approach to the design of new development that meets the community's expectations. As this is one of the few neighbourhood plans in the South East of England to have included a comprehensive design code (as opposed to more commonly used design guidance), we feel that it would be helpful to include a commitment to monitor the effectiveness of the design code and its influence on decisions within Policy HO2. This would enable support for any changes to the design code that the community consider necessary to further meet their expectations when the plan is reviewed in five years' time.



We are concerned that Policy HO4, which proposes to allocate 9 sites for development, does not contain any information on how heritage assets will be affected, nor does it include requirements to avoid or minimise harm or direction to how this should be achieved. As previously, we recommend that the site allocation considerations set out in Chapter 5, including the requirement for development to adhere to the design code, are included in Policy HO4's supporting text to make the policy more directive. Where the requirements for a site to respond positively to heritage assets may require a deviation from the design code's prescriptions, this should also be identified clearly in the allocation policy. Paragraph 16 of the National Planning Policy Framework requires that plans "*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*".

We support the intent of Policy HO7 on the historic environment, but we feel that the policy wording should be amended to better reflect the policy set out in the National Planning Policy Framework to conserve heritage assets in a manner appropriate to their significance and would suggest the following amendments:

~~"Every effort should be made to avoid harm to~~ **Designated heritage assets and their settings**, such as listed buildings, **scheduled monuments, and conservation areas, will be expected to be protected, conserved and, where practicable, enhanced where they would be affected by development proposals.** ~~and non-designated heritage assets of key importance within the community. In cases where harm is unavoidable, the potential benefits of the development should be weighed against the negative harm likely to come to the heritage assets.~~ **Proposals for development that will result in the loss of, or harm to a non-designated heritage asset will not be supported, unless it can be demonstrated that the benefits of the development outweigh the loss of significance of the asset and cannot otherwise be provided in a less harmful manner."**

We welcome policy BNE6 which nominates 14 sites/buildings as non-designated heritage assets. We support the use of local listing to identify those heritage assets that are valued locally but either do not meet the criteria for national designation or have not previously been considered for such protection. We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest in order to ensure they merit consideration in planning for their significance and to inform future decisions to sustain or enhance this significance.

For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's

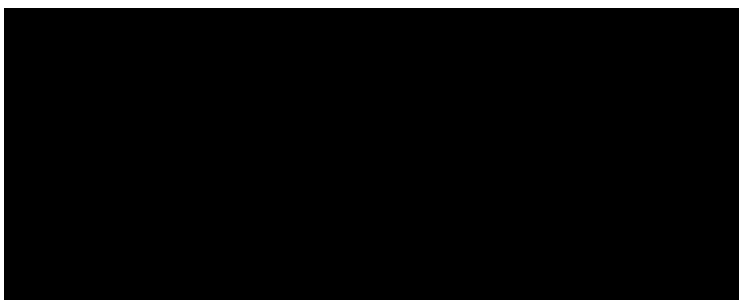


planning and conservation advisers, and if appropriate the Kent Historic Environment Record.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,



Checked by:

