

### WEST MIDLANDS OFFICE

Mr David Clarke
Malvern Hills District Council
Council House
Avenue Road
Malvern
WR14 3AF

Our ref: PL00018085

Direct Dial:

22 February 2017

Dear Mr Clarke

# **KEMPSEY NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION**

Thank you for the invitation to comment on the draft Neighbourhood Plan. Historic England is supportive of both the Vision and the objectives set out in the Plan, particularly the emphasis placed upon local distinctiveness and the maintenance of the historic landscape and rural character. We also note and highly commend the fact that the Plan evidence base includes a historic landscape characterisation (HLC) study. We do, however, find it regrettable and somewhat of a missed opportunity that our earlier suggestions, put forward in our response to the regulation 14 consultation (25<sup>th</sup> April 2016) do not appear to have been taken up. You may wish to review this. That said we have no further substantive comment to make on this iteration of the Neighbourhood Plan.



Historic Places Advisor peter.boland@HistoricEngland.org.uk

CC:







#### WEST MIDLANDS OFFICE

Ms Helen Emerick Kempsey Parish Council Parish Office Community Centre Main Road Kempsey WR5 3LQ

Direct Dial:

Our ref: PL00018085

25 April 2016

Dear Ms Emerick

#### KEMPSEY NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION

Thank you for the invitation to comment on the draft Neighbourhood Plan. Historic England is supportive of both the Vision and the objectives set out in the Plan, particularly the emphasis placed upon local distinctiveness and the maintenance of the historic landscape and rural character.

We note and highly commend the fact that the Plan evidence base includes a historic landscape characterisation (HLC) study. We consider that a Policy could very usefully be drafted that sets out to conserve those areas identified in the HLC as having positive local landscape *or townscape* character by requiring intending developers to: "Conserve the special local townscape character of Kempsey and demonstrate that they have taken full account of the findings of the Kempsey Historic Landscape Characterisation (HLC) when considering the detailed design of their proposals". Individual historic townscape elements could alternatively (or also if desired) be added as an extra built component to the list in Policy K7- "Protecting the Historic Landscape". Such an approach would then be entirely complementary to Policy K6 "Protecting Non-Designated Heritage Assets".

We also note and commend the fact that the Worcestershire Historic Environment Record (HER) has been consulted. Given the wealth of archaeological remains thus identified within the Parish it would, therefore, also be appropriate to introduce a new policy (or include a reference within an existing policy)requiring developers to: "take account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Worcestershire Historic Environment Record (HER). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence".

The draft Plan also makes it clear that the Parish hosts a number of historic farmsteads. Such complexes, often threatened with redundancy, are highly sensitive to proposals to alter or convert and we therefore suggest adding a reference to these within an appropriate Policy Eg:

"Redevelopment, alteration or extension of historic farmsteads and agricultural



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buildings within the Parish should be sensitive to their distinctive character, materials and form. Due reference and consideration should be made to the Worcestershire Farmstead Assessment Framework".

(Reference: Lake, J. (Ed.). (2014) Worcestershire Farmstead Assessment Framework. English Heritage & Worcestershire Archive and Archaeology Service, Worcester). On a final note you will be aware that Historic England has some outstanding concerns about Policy K10 (specifically site 10KB) that are subject to separate correspondence, we look forward to a speedy resolution on that issue. I hope these comments are helpful to you.

Yours sincerely,



Peter Boland Historic Places Advisor peter.boland@HistoricEngland.org.uk

CC:



