

# Statement of Common Ground

Historic England &  
Havant Borough Council

June 2026

## Introduction

1. This Statement of Common Ground (SoCG) is a jointly agreed statement between Historic England (HE) and Havant Borough Council (HBC). It sets out matters that are agreed between the two parties in relation to the preparation of the Havant Borough's new Local Plan – the Building a Better Future Plan (BBFP).
2. Following consultation on the proposed changes to the 2025 Draft (Regulation 18) Building a Better Future Plan, the two Parties have continued to work together to agree a small number of further changes to improve the 'soundness' of the Publication Plan. These are set out under the relevant headings below and under the Appendices.
3. Appendix 1 sets out the agreed modifications to the Local Plan in response to Historic England's representations. Appendix 2 contains the new suite of heritage policies drafted in consultation with Historic England further to the Reg 18 consultation.

## Background

1. This Statement of Common Ground (SoCG) has been prepared in accordance with paragraphs 27 and 28 of the NPPF (December 2024) and the section on Maintaining Effective Cooperation of the Planning Practice Guidance.
2. Historic England (HE) is the Government's statutory advisor responsible for identifying and protecting England's heritage and safeguarding its setting within the wider landscape. Historic England provides expert advice on plan-making, planning applications and listed building consents for developments affecting the historic environment.
3. Historic England is named as a specific consultation body in HBC's Statement of Community Involvement (SCI).

## Historic Environment and Heritage Policies

4. Following consultation on the Draft BBFP, a new suite of heritage policies was prepared in discussion with Historic England (which will replace the Heritage and Historic Environment policy in the BBFP). These policies<sup>1</sup> address the different types of heritage assets within the Borough and are entitled as follows:
  - Policy 32: The Historic Environment
  - Policy 33: Conservation Areas
  - Policy 34: Listed Buildings
  - Policy 35: Archaeology
  - Policy 36: Locally listed buildings and non-designated heritage assets
  - Policy 37: Improvements in Energy Performance of Historic Assets

---

<sup>1</sup> It should be noted that the final policy numbering may change in the Publication Regulation 19 BBFP.

5. Following engagement with Historic England on their comments on the Draft BBFP, including discussion with the Council's conservation officer and subsequent email correspondence, the matters raised were taken into account in the drafting of the heritage policies. Draft wording was then shared with Historic England and any further comments received were incorporated where appropriate. Following this process, Historic England has confirmed that it has no outstanding comments and, in being a signatory to this Statement of Common Ground, fully supports the new heritage policies. Historic England is satisfied that the Building a Better Future is legally compliant and sound.

## Ongoing Cooperation

6. Havant Borough Council will continue to work with Historic England (HE) in their role as a statutory consultee for plan-making and planning applications. Historic England's expert advice may be sought in relation to specific sites or heritage assets.

## Signatories

<b>This statement has been prepared and agreed by the following organisations</b>	
<b>Havant Borough Council</b>	<b>Historic England</b>
Signature	Signature
	
David Hayward	Alan Byrne
Strategic Planning Manager	Historic Environment Planning Adviser
Date : 01 July 2026	Date : 29 June 2026

# Appendix 1: Historic England Response to the Draft Building a Better Future Plan

The tables below summarise the comments made by Historic England during the Reg 18 consultation on the Local Plan (BBFP) and the Council’s response and action further to the comments.

Support comments have been noted but are not included in the tables below.

## 1. Policies:

Historic England Comment	HBC Response/ Action
<p><b>Corporate Strategy Theme and Local Plan Objective 2: Pride in Place (Pg 21 or Pg 25 of the PDF)</b></p> <p>The historic environment makes an integral contribution to local distinctiveness and the connection between people and place, which is helpfully introduced earlier in the plan regarding the journey of Havant borough. We recommend highlighting and interweaving heritage when considering how to deliver pride in place and suggest relevant wording for consideration.</p> <p>Suggested wording: “e) Conserve the Borough’s heritage and support the appreciation of its significance”</p>	<p>Support noted. No further action required.</p>
<p><b>Policy 1: Spatial Strategy</b></p> <p>We strongly recommend editing policy 1, informed by further reflection on how the historic environment is integrated within the Council’s Spatial Strategy. We suggest wording for consideration.</p>	<p>Added heritage consideration to the right hand column in Local Plan Objective 2</p>
<p><b>Policy 3: Regeneration</b></p> <p>There is the opportunity for regeneration to connect with local heritage, especially in Havant town centre. The SA in Appendix C notes Havant town centre is a “very sensitive historic environment”. This needs to be picked up in the policy approach to regeneration, accompanied by suitable cross references to the heritage section of the plan.</p> <p>We would be happy to confer further how this is to be best achieved. Meanwhile, we recommend drawing from (and referring to) the new St. Faith’s conservation Area Appraisal and Management Plan in the supporting text e.g. “The Conservation Area retains its medieval town plan, centred around the crossing point of two Roman roads with a nucleus at the 12th-century St Faith’s Church. The tight urban grain of the medieval town is well-preserved.”</p> <p>It would be helpful also to note that St. Faith’s church (Grade II*) is currently on the national Heritage at Risk Register.</p>	<p>No change required as this is covered by the heritage policies</p>

<p>Also, we note the Council’s SA states in Appendix D that the area has strong archaeological potential and that there is potential “to mitigate harm through layout, design, building heights, separation distances, landscape buffers. Require assessment of the archaeological potential, including past impacts.”</p> <p>For more general advice on heritage and regeneration, refer to:  <a href="https://historicengland.org.uk/advice/planning/place-making-and-regeneration/">https://historicengland.org.uk/advice/planning/place-making-and-regeneration/</a></p> <p>Depending how the Council wishes to proceed in tackling the issued facing the Coastguards conservation area, the plan provides an opportunity to highlight that the Coastguards conservation area is on the national Heritage at Risk Register and guide next steps as appropriate.</p>	
<p><b>Policy 8: Health and Climate Change</b></p> <p>We suggest a minor amendment to recognise the extent to which climate change can also impact on our historic environment, especially in parts of the Borough that may be susceptible to flooding or coastal erosion. Also, this connects with paragraph 8 of the NPPF.</p> <p>Suggested change: “Climate change has the ability to completely reshape the built, historic and natural environment if not addressed.”</p>	<p>Wording added. This policy is now divided to two separate policies: Policy 12 Health and Policy 11 Climate Change</p>
<p><b>Policy 8: Health and Climate Change</b></p> <p>It would be good to ensure this text recognises the link between building re-use and heritage conservation. We suggest wording for consideration.</p> <p>Suggested change: “Consideration of climate change starts with the question of whether development is necessary or whether existing buildings and structures on the site can be adapted to an alternative use if their existing use is no longer needed or appropriate. Re-using or adapting existing buildings will always be less carbon intensive than demolition and rebuild. Also, it connects with and supports the conservation of historic buildings, adapting them in a way that is sensitive to their significance. ...”</p>	<p>Changes made.</p>
<p><b>Policy 8: Health and Climate Change</b></p> <p>It would be good to ensure this text recognises the link between green infrastructure and heritage. We suggest wording for consideration.</p> <p>Suggested change: “Green infrastructure can deliver multiple functions, including storing carbon, providing cooling and shading (through green walls and roofs),</p>	<p>Changes made.</p>

<p>helping manage flood risk (including through sustainable drainage systems and rain gardens), conserving and enhancing biodiversity, conserving and enhancing heritage assets, and supporting opportunities for improvement to health and wellbeing...”</p>	
<p><b>Policy 8: Health and Climate Change</b></p> <p>We suggest inserting a new subsection on “Access to heritage” to follow the subsection on access to nature. This could refer, for example, to the fact that the nature and historic environments are integral to each other e.g. Leigh Park (Staunton Country Park) Registered Park and Garden (Grade II*). Also, it could refer to other heritage assets such as conservation areas (e.g. in Emsworth) and potentially Fort Purbrook scheduled monument (currently on the national Heritage at Risk Register). For more on heritage and wellbeing, refer to: <a href="https://historicengland.org.uk/whats-new/news/research-shows-heritage-boosts-your-wellbeing/">https://historicengland.org.uk/whats-new/news/research-shows-heritage-boosts-your-wellbeing/</a></p>	<p>No change needed in regard to the policy.</p>
<p><b>Heritage</b> <b>Policy 8: Health and Climate Change</b></p> <p>We suggest inserting a new subsection on “Access to heritage” to follow the subsection on access to nature. This could refer, for example, to the fact that the nature and historic environments are integral to each other e.g. Leigh Park (Staunton Country Park) Registered Park and Garden (Grade II*). Also, it could refer to other heritage assets such as conservation areas (e.g. in Emsworth) and potentially Fort Purbrook scheduled monument (currently on the national Heritage at Risk Register). For more on heritage and wellbeing, refer to: <a href="https://historicengland.org.uk/whats-new/news/research-shows-heritage-boosts-your-wellbeing/">https://historicengland.org.uk/whats-new/news/research-shows-heritage-boosts-your-wellbeing/</a></p>	<p>No action needed. Interconnection of natural and historic environment has already been explored and added in the Heritage policies. It is considered that there is no need to add the wellbeing benefit of accessing to heritage in the policy as it will deter from the context. This part is already implicitly referred to as 'social' benefit.</p>
<p><b>Policy 11: The Role of Applicants and the Local Planning Authority in Delivering Development</b></p> <p>It would be good to ensure this text recognises the link between green infrastructure and heritage. We suggest wording for consideration. “Green infrastructure can deliver multiple functions, including storing carbon, providing cooling and shading (through green walls and roofs), helping manage flood risk (including through sustainable drainage systems and rain gardens), conserving and enhancing biodiversity, <u>conserving and enhancing heritage assets</u>, and supporting opportunities for improvement to health and wellbeing...”</p>	<p>Policy removed. The need for early engagement emphasised in Policy 1: Development Strategy</p>
<p><b>Policy 12: High Quality Design</b></p>	<p>Change made.</p>

<p>Might c i and iii usefully be combined? They cover broadly the same topic. If they are not combined, they could be tailored to make them clearer.</p> <p>We suggest minor amendments to criterion c iv, looking to retain focus on “significance” and align with the NPPF e.g. paragraph 20 of the NPPF refers to conservation and enhancement of the historic environment.</p> <p>Suggested change: “i. Respects and positively relates to its local character, distinctiveness and appropriately integrates with the site and its surroundings  ii. Considers the features of the surrounding area or the main building to which the proposal relates, including density, heights, scale, massing, landscaping, existing building lines, setbacks, plot widths, depth and proportion in addition to external design characteristics such as roofs, windows, doors, external materials and architectural detailing;  iii. Conserves and/or enhances the character of the area and appearance of the street scene, through appropriate design, scale and materials, and contributes to a harmonious overall relationship with the existing built form and spaces;  iv. Protects, cConserves and where possible seeks to enhances the significance of heritage assets on and in the vicinity of the site; ...”</p>	
<p><b>Policy 15: Low Carbon Development</b></p> <p>The climate also affects the historic environment and this should be acknowledged appropriately in the plan.</p> <p>Suggested change: “Our climate is changing. The impacts of these changes can have detrimental effects on the built, historic and natural environment, as well as human physical health...”</p>	<p>Added into policy. Change made.</p>
<p><b>Climate Change</b></p> <p>It is important to recognise that a “fabric first” approach is not appropriate for traditionally constructed buildings. Note the potential to refer to paragraph 4.83.</p>	<p>Noted. This is picked up by the new historic environment policies but is referenced in paragraph 4.87. No action needed.</p>
<p><b>Heritage and Landscape</b>  <b>Policy 15: Low Carbon Development</b></p> <p>Might a footnote be added to our advice note?</p> <p><a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</a></p>	<p>Footnote added to Policy 15 (Low Carbon Development). The comment is addressed as part of the revised policy (The Historic Environment) in supporting text and footnote.</p>
<p><b>Policy 15: Low Carbon Development</b></p> <p>Might a footnote be added to our advice note?</p>	<p>Added in both policies.</p>

<p><a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</a></p>	
<p><b>Policy 17: Sustainable Construction Methods, Materials and Waste</b></p> <p>We suggest clarifying how heritage significance is taken into account for historic buildings.</p> <p>“b) Reuses or adapts existing buildings where applicable as part of the development whilst conserving and enhancing heritage significance and maintaining and enhancing local character and distinctiveness;”</p>	<p>Additional wording added in but in a different part of the policy.</p>
<p><b>Policy 21: The Local Ecological Network</b></p> <p>We suggest adding a new paragraph describing how the natural and historic environments are integral to each other and recommending, where possible, an integrated approach to land management, which has the potential to deliver multiple benefits, to nature, heritage and our climate.</p>	<p>New paragraph added to the policy to reflect the interconnectedness of the historic and natural environments.</p>
<p><b>Policy 28: Development on the Coast</b></p> <p>We suggest adding a new paragraph that summarises the range of heritage assets on the Havant coastline, such as Scheduled Monuments, Listed Buildings and conservation areas.</p>	<p>Amend policy criterion to include historic built forms as well as coastal landscape and natural environment</p>
<p><b>Heritage and Landscape</b></p> <p>The text needs to recognise that our understanding of the historic environment continues to evolve. We highlight the fact the potential to uncover archaeological remains, some of which may be nationally important. Currently the paragraph omits reference to non-designated archaeological assets.</p> <p>Suggested change: The Borough has a number of heritage assets; 14 conservation areas, 246 buildings of special architectural or historic interest (listed buildings), 83 buildings of a local interest, 7 scheduled monuments, and 1 registered park and garden and <u>a wealth of non-designated archaeological assets (for more information refer to the Historic Environment Record). Our knowledge of the Borough’s heritage continues to evolve as we uncover new assets and understand more about our heritage.</u> The Borough is also home...”</p>	<p>Comments noted. Alterations made to paragraph in introduction section.</p>
<p><b>Heritage and Landscape</b></p> <p>We suggest minor edits to this paragraph.</p> <p>The Building a Better Future Plan will seek to protect, conserve and enhance designated landscape and <u>the Borough’s</u> its heritage assets and their settings,...”</p>	<p>Comments noted. Alterations made to paragraph in introduction section.</p>

<p><b>Policy 29: Designated Landscapes</b></p> <p>We suggest adding a new paragraph at the outset of this section that recognises that the natural and historic environments are integral to each other. This provides opportunities for integrated management and the delivery of a multiple benefits. As noted in the latest (draft) Chichester Harbour National Landscape Management Plan “National Landscapes have a distinctive sense of place and represent our shared heritage and national identity.” Purpose 1 of the National Park is “To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.” It would also usefully refer to the county level work done on historic landscape assessment:  <a href="https://www.hants.gov.uk/landplanningandenvironment/environment/historicenvironment/landscape">https://www.hants.gov.uk/landplanningandenvironment/environment/historicenvironment/landscape</a></p>	<p>Comments noted. New paragraph added to the introduction section 'Context and approach to Heritage and Landscape'</p>
<p><b>Policy 30: Heritage and the Historic Environment</b></p> <p>We query reference to heritage and the historic environment. One infers heritage refers to heritage assets. If that is the case, then we suggest amending the title to “Heritage assets and the Historic Environment”. If that’s not the intention, then arguably a heading of “The Historic Environment” would be simpler.</p>	<p>This policy is replaced by a new heritage policies suite covering different heritage assets and conservation areas. Change made to the title but no further action needed in regard to this comment.</p>
<p><b>Policy 30: Heritage and the Historic Environment</b></p> <p>We welcome acknowledgement of the need to review and revise the plan’s approach to heritage policy. Currently Policy 30 is very high level and largely reproduces the NPPF. It would be better to have a more locally tailored suite of heritage policies. We look forward to conferring further about this with the Council.</p>	<p>Comment noted. This policy is replaced with new heritage policies suite covering different heritage assets and conservation areas. Therefore no action needed in regard to this comment.</p>
<p><b>Policy 30: Heritage and the Historic Environment</b></p> <p>As stated above, we query reference to heritage and the historic environment. One infers heritage refers to heritage assets. If that is the case, then we suggest amending the title to “Heritage assets and the Historic Environment”. If that’s not the intention, then arguably a heading of “The Historic Environment” would be simpler. We note the policy is high level and not locally tailored. Principally it reproduces the NPPF. We recommend a more nuanced approach and welcome the indication that this is in the Council’s plans too. Bear in mind also the need to consider heritage policy both in terms of strategic policy (see NPPF paragraph 20) and non-strategic policies (which support effective development management).</p>	<p>Comment noted. This policy is replaced with new heritage policies suite covering different heritage assets and conservation areas. Therefore no action needed in regard to this comment.</p>
<p><b>Policy 52: Renewable Energy Infrastructure</b></p> <p>Historic England is broadly supportive of renewable energy development; but such development needs to be informed by an understanding of potential heritage</p>	<p>Historic word not to be included as criterion e covers this issue. Policy to remain as written</p>

<p>impacts. We are unclear the degree to which heritage considerations have informed the Council’s renewable energy capacity study. Figure A-1 refers to “Landscape and Cultural Constraints”; but related heritage considerations appear not to be integrated within the narrative of the study. This is carried forward into the local plan. Heritage should be a consideration in cumulative impacts, which affects criterion c). We welcome reference to heritage considerations in criterion e) and suggest minor editing to clarify what is being referenced – the significance of what? Also, reference should be made to the setting of assets.</p> <p>Suggested change: “...c) The location, scale and design, avoid or mitigate any adverse effects on the built environment, biodiversity, heritage, landscape and neighbouring uses in terms of cumulative impacts; d) Proposals have been sensitively integrated within the whole building including where applicable in roof profiles in order to avoid an unacceptable impact on the appearance of the existing development, communities, building and the surrounding landscape. e) There is no unacceptable impact on the architectural, historic, archaeological significance of one or more heritage assets (including their setting) or on the natural environment;”</p>	<p>as it is more inclusive of specific types of asset. No action needed</p>
<p><b>Policy 52: Renewable Energy Infrastructure</b></p> <p>We suggest reviewing the wording of paragraph 4.550. Since the policy (rightly) does not set renewable energy targets, surely a proposal can comply with the policy and meet the policy in full?</p>	<p>No action required</p>
<p><b>Policy 52: Renewable Energy Infrastructure</b></p> <p>We strongly recommend expanding the considerations covered in paragraph 4.551 and suggest wording for consideration</p> <p>Suggested change: “Heritage – harm to the significance of heritage assets should be avoided and minimised, informed by proportionate heritage impact assessment.”</p>	<p>Suggestion included in part but not a HIA-flagged with heritage policies to see whether this is included here.</p>
<p><b>Policy 55: Future Management and Management Plans</b></p> <p>We suggest minor amendment to acknowledge the potential for heritage assets to be affected by (and benefit from!) management plans</p>	<p>Policy removed. Advice to be provided in Developer's Contribution Guide instead.</p>
<p><b>Policy 52: Renewable Energy Infrastructure</b></p> <p>Heritage considerations in other policies Acknowledging the cross-cutting nature of heritage, there are several policies that would benefit from a modified approach, for example:</p> <ul style="list-style-type: none"> <li>• Policy 1: Spatial Strategy</li> </ul>	<p>Review suggested wording to relevant policies, and consider whether heritage is appropriately interwoven throughout the plan. The local plan has a dedicated section to Heritage and Historic Environment. All the</p>

<ul style="list-style-type: none"> <li>• Policy 2: Regeneration</li> <li>• Policy 52: Renewable Energy Infrastructure</li> </ul>	<p>policies in the Local Plan are considered when assessing applications relating to heritage and historic environment, therefore are interlinked. No action required in regard to this comment.</p>
<p><b>Policy 3: Regeneration</b></p> <p>Heritage considerations in other policies Acknowledging the cross-cutting nature of heritage, there are several policies that would benefit from a modified approach, for example:</p> <ul style="list-style-type: none"> <li>• Policy 1: Spatial Strategy</li> <li>• Policy 2: Regeneration</li> <li>• Policy 52: Renewable Energy Infrastructure</li> </ul>	<p>No action needed</p>
<p><b>Policy 1: Spatial Strategy</b></p> <p>Heritage considerations in other policies Acknowledging the cross-cutting nature of heritage, there are several policies that would benefit from a modified approach, for example:</p> <ul style="list-style-type: none"> <li>• Policy 1: Spatial Strategy</li> <li>• Policy 2: Regeneration</li> <li>• Policy 52: Renewable Energy Infrastructure</li> </ul>	<p>Comments noted. New heritage policies are proposed addressing the concerns. No further action needed under Policy 1</p>
<p><b>Whole Plan</b></p> <p>Heritage considerations in other policies Acknowledging the cross-cutting nature of heritage, there are several policies that would benefit from a modified approach, for example:</p> <ul style="list-style-type: none"> <li>• Policy 1: Spatial Strategy</li> <li>• Policy 2: Regeneration</li> <li>• Policy 52: Renewable Energy Infrastructure</li> </ul>	<p>The local plan has a section addressing Heritage and Historic Environment The Plan should be read as a whole when assessing applications relating to heritage and historic environment, therefore are interlinked. It is concluded that no action required in regard to this comment.</p>

## 7. Allocations:

Historic England Representation/ Comment	HBC Response/ Action
<p><b>Allocation 1: Southleigh</b></p> <p>We recommend adding heritage as a key consideration at the outset of criterion a) and adding a sub-criterion along the lines suggested that requires heritage impact assessment and picks up on the archaeological potential of the site, as identified within the key features. Note - it may be worth checking (once again) with the archaeological adviser. The SA does not appear to identify the archaeological potential of this allocation in Appendix D (though the SA does note the potential for loss of historic parkland setting in Appendices C and D).</p> <p>Suggested change: “Provide a site-wide high quality coherent strategy for ecology, heritage, landscaping,</p>	<p>Change made to add heritage into the list but additional criterion is not considered necessary as we have policies which deal with heritage.</p>

<p>green space, drainage and lighting with a fully integrated mitigation / compensation / enhancement package. This should include, but is not limited to:</p> <p>vii. heritage impact assessment to respond sensitively to any affected heritage assets, including or accompanied by archaeological desk-based assessment (field evaluation may also be required)”</p>	
<p><b>Allocation 2: Long Copse Lane</b></p> <p>In the section on key features, we suggest greater clarity on the listed building(s) relative to the site. The two listed buildings are north of the western section of the site. But they are west of the main site.</p> <p>Within the policy itself, we recommend clarifying that Hollybank House includes 2 designated heritage assets.</p> <p>We welcome reference to Hollybank Farm Cottage as a non-designated heritage asset.</p> <p>Suggested change: “l) Take into consideration Hollybank House which includes is a two Grade II listed buildings and Hollybank Farm Cottage which is a non-designated heritage asset.”</p>	<p>Change made. Key features updated.</p>
<p><b>Allocation 5: Southleigh Park House</b></p> <p>While we note planning permission has already been granted for development, if the policy is to be included in the plan it needs to include a requirement for heritage impact assessment of the proposals. This is needed to inform how the proposed development of 61 dwellings would respond to the significance of the listed buildings (including the contribution to significance made by their setting). We recommend adding a new criterion f to the initial allocation requirements.</p> <p>It is surprising that the SA does not refer to this in Appendix D.</p> <p>Suggested change: “f) Provide a heritage impact assessment”</p>	<p>Criterion added to allocation policy</p>
<p><b>Allocation 9: Belmont Castle Rest Home, 18-20 Portsdown Hill Road</b></p> <p>The site’s key features refer to the two Scheduled Monuments nearby, but they are not referenced in the allocation requirements. To ensure proposals seek to avoid or minimise harm to the significance of those assets, the allocation requirements should be revised accordingly. We suggest wording for consideration.</p> <p>Suggested change: “...b) Take into consideration The Towers (which is a Grade II listed building) and the two Scheduled Monuments (Bevis Grave and the Camp Down</p>	<p>Criterion added to the allocation policy. <i>Take into consideration the Towers (which is a Grade II listed building) and the two Scheduled Monuments (Bevis Grave and the Camp Down Roman villa) through the provision of a heritage impact assessment.</i></p>

<p>Roman villa) through the provision of a heritage impact assessment;...”</p>	
<p><b>Allocation 12: Portsmouth Water Headquarters</b></p> <p>Key features: the current text states that the site includes listed and locally listed buildings. We believe the site does not include listed buildings, though it is adjacent to listed buildings. We suggest double-checking the text. Also, it may be worth liaising with the Council’s archaeological adviser regarding the archaeological potential of the site, assuming that has yet to be done. It is good to see reference to the springs and origins of Havant in the Design and Layout requirements. That said, criterion p) is very open to interpretation. We suggest providing more clarity on what is being sought and offer revised policy wording for consideration.</p> <p>The supporting text would also benefit from being reviewed, including explicit acknowledgement that the Old Tannery Building at the southern end of the site has been identified in the Conservation Area Management Plan as being vulnerable.</p> <p>Suggested change: “p) Incorporates the springs and the origin of Havant into the development physically or intellectually. The historic context and natural features associated with the site contribute to its character and heritage significance. Proposals are encouraged to retain and re-use historic buildings on the west and southern parts of the site fronting Brockhampton Road.</p>	<p>Key features updated.</p>
<p><b>Allocation 23: MDA Newlands Phase 1 Hambledon Road (Phases 4 and 8)</b></p> <p>We query the reference in both the key features and policy to 3 listed buildings to the east and southeast of the site. Clarifications are needed in the key features and in the policy.</p> <p>The eastern section of the southern parcel of land intersects with St. John’s conservation area. Is this intentional? What is the aim for this part of the site?</p>	<p>Key features updated.</p>
<p><b>Allocation 24: South Downs College Car Park</b></p> <p>Criterion h would benefit from greater clarity in terms of design intentions. We infer this is principally linked with access, not development on top of the Roman road. We suggest making this clear.</p> <p>Suggested change: “h) Reflect the line of the Roman road which crosses the site, through suitable access measures such as a road or path;”</p>	<p>Change made.</p>
<p><b>Allocation 25: Campdown</b></p> <p>In the key features, we recommend flagging that the archaeological remains are not simply a constraint on</p>	<p>Change made.</p>

<p>development, but an opportunity for locally distinctive place-shaping. Reflecting this, there is also the opportunity in the allocation requirements to secure enhancements to the Scheduled Monument relating to its management, interpretation and appreciation. We suggest revised wording (amending criterion f) for consideration.</p> <p>Suggested change:</p> <p>Key features: “Extensive archaeological remains which constrains the amount of developable land, but also provide an opportunity for locally distinctive place-shaping. The Roman villa Scheduled Monument and the remains of a roman road lie within the north of the site, with the Long Barrow Scheduled Monument to the south of the site. Fort Purbrook Scheduled Monument lies in close proximity to the site.”</p> <p>Allocation requirements: “f) Incorporate ‘secure by design’ measures to protect the scheduled monument(s) from accidental or deliberate damage, including any proposed new planting or postholes as part of a landscape strategy, and suitable enhancements that support its appreciation and conservation, informed by early engagement with Historic England;”</p>	
<p><b>Allocation 27: Dunsbury Park strategic site</b></p> <p>We note the key features identify an Iron age settlement, but the requirements provide no response to those archaeological remains. We recommend conferring with the Council’s archaeological adviser as a next step to ensure the policy approach is appropriate.</p>	<p>Archaeology policy would apply to development proposals on the site.</p>
<p><b>Allocations</b></p> <p>We do not object in principle to the allocations in the Regulation 18 consultation; however, we recommend changes to some of the allocation policies, to recognise more clearly the heritage issues arising and the desired response(s) from applicants.</p> <p>We appreciate the engagement to date on the Campdown site, informed by the Council’s heritage assessment.</p>	<p>Review suggested wording under relevant allocations.</p>

## Appendix 2: Draft Heritage Policies

### Policy 32: The Historic Environment

#### Why the policy is needed

2.1 The historic environment in Havant Borough, including both designated and non-designated heritage assets, is a key part of the Borough's identity, embracing all features that contribute to creating its unique sense of place, value and local character, and support the quality of life, leisure, education and tourism. While the historic environment can add value to new developments by creating a sense of place and distinctiveness, new developments need to be designed in a way that respects and complements heritage assets and their surroundings and enhances areas that are less attractive.

2.2 In line with the National Planning Policy Framework (NPPF) which sets out that plans should include a positive strategy or the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats, the Council recognises the contribution of the historic environment to the distinctive character of our landscape and townscape, and to the quality of life of current and future residents. As such, heritage assets must be conserved and, where possible, enhanced in a manner appropriate to their significance. In understanding this, new development will be expected to complement and enhance the historic environment, helping to shape modern communities by giving them a sense of history and distinct local identity.

2.3 Designated heritage assets include listed buildings, scheduled monuments, registered parks and gardens and conservation areas which are designated under the relevant legislation. Non-designated heritage assets include buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance which merits consideration in planning decisions; they are usually identified as having local significance. In some cases, non-designated heritage assets, particularly archaeological remains may be of equivalent significance to designated assets, although they may not be formally designated.

2.4 The Borough has a number of heritage assets; 14 conservation areas, 246 buildings of special architectural or historic interest (listed buildings), 83 buildings of a local interest, 7 scheduled monuments, and 1 registered park and garden and a wealth of non-designated archaeological assets (for more information refer to the Historic Environment Record). Our knowledge of the Borough's heritage continues to evolve as we uncover new assets and understand more about our heritage. Heritage assets, as part of the wider historic environment, are irreplaceable resources which make a valuable contribution, not only to the character of the Borough, but also to quality of life, leisure, education and tourism. Historic England provide advice and guidance on Heritage Sustainable Growth<sup>2</sup>.

2.5 A significant part of the enhancement of heritage assets is their care and maintenance which is a joint responsibility of the Council and the owner of the asset. The great majority of listed buildings, monuments and designated heritage assets in the borough are in good condition. However, there are a number of assets that have fallen into disuse, dereliction and disrepair for a variety of reasons. Historic England publish a national 'Heritage at Risk' register<sup>3</sup>, which is updated

---

<sup>2</sup> <https://historicengland.org.uk/advice/planning/heritage-and-growth/>

<sup>3</sup> <https://historicengland.org.uk/listing/heritage-at-risk/search-register/>

regularly. This policy encourages owners of heritage assets to maintain them and respect them for future generations to enjoy.

### **Policy 33: The historic environment**

All development should seek to preserve and enhance the Borough's historic environment, including the heritage assets and their settings, in line with local and national policy. Where applicable, proposals affecting heritage assets should demonstrate, through a Heritage Statement and, other relevant assessments, a clear understanding of the significance of any heritage assets affected by the proposal, including the contribution made by their setting.

#### **Heritage and Climate Change:**

Development proposals seeking to enhance the energy efficiency of heritage assets or traditionally constructed buildings, will be expected to demonstrate the proposed approach<sup>4</sup> is proportionate to the significance of the asset and its setting.

#### **Heritage at Risk:**

Development impacting heritage assets listed under the national Heritage at Risk registers or deemed vulnerable by the Council will only be supported where the proposal demonstrates that:

- a) It enhances, protects and/or conserves the heritage asset; and
- b) The proposed scheme is the optimal viable use of the heritage asset

Where a proposed development would ensure the conservation of a heritage asset, however conflicts with other policies in the Plan, the Council will assess the application on the basis of whether the benefits of conservation outweigh any harm resulting from conflicting with other policies. The extent of any such enabling development should be no greater than necessary to make the conservation of the heritage asset viable.

### **How the policy will be implemented**

2.6 In managing the historic environment, the first presumption is that heritage assets will be preserved and enhanced in a manner appropriate to their significance. It is important to understand the significance of an asset in line with the NPPF definition in order to assess the potential impact. In some cases, an alternative use may be more appropriate in the interests of securing the long-term conservation of an asset. In accordance with national guidance, weight will be attached to the benefits of ensuring a viable use of the heritage asset when making a balanced assessment of such development proposals.

2.7 Where development may affect a heritage asset, applicants will be expected to demonstrate a full understanding of its significance and to address this through the pre-application discussion process. Applications for development within or adjacent to a heritage asset that has the potential

---

<sup>4</sup> The approach here should meet the requirements set out in the NPPF, have regard to technical advice and guidance from Historic England and be informed by heritage experts, and where applicable involve consultation with the Council's Heritage Team.

to have an effect, including their setting, will be required to include a Heritage Statement and Impact Assessment. This statement must identify the relevant heritage assets and describe how the development will affect their significance and wider setting. It should provide detailed evidence to demonstrate that:

- The proposals have been formulated with a fully informed understanding of the significance of the heritage asset and its setting, and the effect of the proposals on that significance
- The heritage asset is being put to the optimum viable use consistent with its conservation, and the conservation of its character and setting
- Opportunities to sustain, enhance, to better reveal, avoid or minimise harm to the significance of the asset have been taken
- The development could not be achieved in a less harmful way.

2.8 Heritage statements should be proportionate to the importance of the asset and normally include a summary of the site's historical development, the context of particular features or parts of the site, the current character and use of the site, the current state of repair and the historic, archaeological, cultural, artistic or architectural significance of the site. Recording will also be necessary for any heritage asset where there would be a full or substantial loss. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the Council prior to development implementation and will reflect the importance and nature of the asset and the impact of the proposal.

2.9 Applicants should demonstrate how they have considered and mitigated impacts on heritage assets and refer to relevant sources and guidance, including Conservation Area Appraisals, Conservation Area Management Plans, Community Plans, Neighbourhood Plans and Orders, Urban Character Assessments, Landscape Character Assessments, and the Historic Environment Record (by Hampshire County Council), along with any subsequent updates. Where applicable, the Council will have regard to the use of urgent works and repair notices as set out in the Planning (Listed Buildings and Conservation Area Act 1990) and the powers of maintenance under Sections 77 or 79 of the Building Act (1984) as well as the use of a Section 215 Notice under the Town and Country Planning Act 1990 (as amended). In taking any action, the Council will also have regard to the advice set out by Historic England.

### **Heritage and Climate Change**

2.10 Where appropriate, opportunities to mitigate or adapt to climate change and promote safe sustainable development through the reuse or adaptation of heritage assets to minimise the consumption of building materials and energy will be encouraged. The Council will support responsible retrofitting and appropriate use of micro-renewables in heritage assets, particularly in buildings of traditional construction, where proposals demonstrate that they avoid harm to the historic fabric and significance of the asset. For this purpose, proposals need to be informed by heritage professionals and guidance and refer to the technical advice and guidance for retrofitting historic buildings to improve their energy efficiency published by Historic England<sup>5</sup>. Where applicable, property owners and applicants should refer to Policy 37 (Sustainable Historic Environment) and Policy 18 (Sustainable construction methods, materials and waste).

---

<sup>5</sup> Technical Advice and Guidance available at: <https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/>

## **Heritage at Risk**

2.11 A positive approach to the conservation and enhancement of heritage assets requires that they are maintained to a high standard. This is primarily the responsibility of the owner. The simple fact of a heritage asset being in a poor condition is not a reason for allowing redevelopment or development that could cause harm to the significance of the asset. Owners are encouraged to maintain heritage assets to a high standard in order to preserve their significance. While the Council seeks to support property owners and partners to secure the future of the heritage assets currently at risk, or which have the potential to become at risk in the future, it will be expected from them to work proactively with the authority to bring forward proposals for the preservation and enhancement of heritage assets at risk or under threat within the Borough, in a way that respects and enhances the significance of the heritage asset.

## Policy 33: Conservation areas

### Why the policy is needed

2.12 Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to determine which parts of the area designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance of which it is desirable to conserve or enhance' requiring special attention to be given to the protection, preservation and/or enhancement of these areas. Once designated, legislation requires that local planning authorities act with the aim of protecting, preserving and, where possible, enhancing the character and appearance of these areas, as designated heritage assets. The demolition of buildings and works to trees are also controlled within Conservation Areas.

2.13 The Borough has fourteen Conservation Areas<sup>6</sup>. These areas range from the larger Sir George Staunton to the smaller and more reserved ones such as St John's and Black Dog. These sites are valued for their special architectural, historic and aesthetic interest which includes buildings, street patterns, spaces, trees and views.

2.14 In line with the Act 1990, these conservation areas will be subject or review and re-appraisal by the Council's Heritage team where necessary and appropriate. Section 69(2) requires authorities to review their conservation areas from 'time to time'. In such cases, the Council will consider whether an area is still of a special historic, cultural or architectural value and will assess the character and appearance of which it is considered desirable to preserve or enhance.

2.15 In line with the national policy and guidance, this policy sets out the criteria and requirements to ensure that development within conservation areas, and their settings, preserves, enhances or protects their character or appearance. It also provides a basis for conservation area appraisals, management plans and, where appropriate, Article 4 Directions.

### Policy 33: Conservation areas

Development within or affecting the setting of a Conservation Area should preserve or enhance its special interest, setting, appearance or its architectural, aesthetic, historic character by:

- a) Retaining buildings and other features, including trees, which make a significant contribution to the character of the Conservation Area;
- b) Responding appropriately to the special character of the area and surrounding buildings, through high quality design, in terms of scale, height, layout, design, building style, detailing and materials;
- c) Protecting open spaces, views and other gaps and spaces between buildings and the historic street pattern that are significant to the character and setting of the Conservation Area;
- d) Avoid the incremental loss of features of significance within the Conservation Area, having regard to the cumulative harm of similar proposals, including the loss of boundary walls, front gardens, and traditional architectural features;

---

<sup>6</sup> At the time of writing, the Borough has fourteen Conservation Areas. Conservation Areas Map and Character Appraisals Available at: <https://www.havant.gov.uk/conservation>

- e) Ensuring that the design of shopfronts and advertisements:
  - i) Respects the character of upper floors and neighbouring buildings in terms of scale, proportion, alignment, architectural style and materials;
  - ii) Seeks to retain historic and traditional shopfronts and;
  - iii) Includes consideration of both the need for illumination and the type of illumination which would be appropriate for the host building.

Proposals involving the demolition of a building in a Conservation Area will only be permitted where it has been demonstrated that:

- f) The building detracts from or does not make a positive contribution to the special interest, character or appearance of the Conservation Area; or
- g) The building is of no historic or architectural interest or is wholly beyond repair and is not capable of beneficial use, and
- h) Any proposed replacement must preserve and/or enhance the special character of the Conservation Area.

Wherever possible the sympathetic restoration and re-use of buildings that make a positive contribution to the special interest, character and appearance of a Conservation Area will be encouraged, thereby preventing harm through the cumulative loss of features which are an asset to the Conservation Area.

Proposals which would cause substantial harm to the significance and character of a Conservation Area will not be permitted unless it is demonstrated that the harm would be outweighed by substantial public benefits.

Proposals which would cause less than substantial harm to the significance and character of the Conservation Area will be considered against the public benefits to be gained.

### **How the policy will be implemented**

2.16 Development proposals will be assessed in line with the NPPF and the relevant Conservation Area Character Appraisal where it has been updated in line with current national and local planning policy. In assessing proposals, the Council will give great weight to ensuring the protection, preservation or enhancement of the Conservation Area, its setting or any features of special architectural or historic interest.

2.17 In relation to criterion f) iii), internally illuminated signs will not be supported if they are visually intrusive or compromise the character of the area. Externally illuminated signs, that are appropriately designed, will be considered for premises with significant nighttime trade, unless the cumulative effect of such proposals would compromise the character of the area. The criterion relates to external signage and advertisement which require consent and excludes signage internal to the building which does not require consent. Internally Illuminated as it relates to signs, means

any sign which has a light source entirely enclosed within the sign and not directly visible to the eye.

2.18 Development in Conservation Areas should pay special regard to the importance to respond positively to the special character. This will often mean the use of traditional styles, methods and materials. Often such development can contribute to other environmental objectives, such as the use of sustainably sourced timber or reclaimed materials can contribute to supporting sustainable construction in line with Policy 17 (Sustainable Construction Methods, Materials and Waste) and Policy 38 (Sustainable Historic Environment) of Local Plan. High quality modern and innovative design can also contribute positively to the character and appearance of Conservation Areas where it responds to rather than works against the historic environment, through the sensitive reinterpretation of traditional design elements or materials.

2.19 The Council will seek to work with developers and local communities to take opportunities to improve education and understanding of this important cultural resource when considering applications for development affecting Conservation Areas.

## Policy 34: Listed buildings

### Why the policy is needed

2.20 The borough currently contains almost 250 listed buildings and structures<sup>7</sup> that are statutorily designated for their special architectural and historic interest under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. The term 'listed building' can cover a wide variety of man-made structures, not just residential dwellings, but also churches, industrial and agricultural buildings, war memorials and structures such as bridges, walls, statues, mileposts, phone boxes and lamp posts. Within the borough, these designated assets contribute significantly to the local character and distinctiveness and often act as focal points within town and district centres and the wider landscape. The NPPF gives great weight to the conservation of designated heritage assets, including listed buildings, and expects any harm to be clearly justified and weighed against public benefits. Therefore, there is a requirement for planning decisions to have special regard to the desirability of preserving the significance of these listed buildings and their settings.

2.21 Buildings and structures built before 1700, which remain largely intact or closest to their original condition are likely to be listed, along with those constructed between 1700 and 1850. Post-1945 buildings which have potential to be listed must meet a more rigorous criteria set by Historic England, and there is usually a minimum building age of 30 years for it to be eligible for listing. Listed buildings are graded as Grade I, II\* and II to reflect their relative special architectural and historic interest:

- Grade I buildings are those which are of exceptional special interest. In the borough there are two; *Church of St Peter, Hayling Island and Church of St Thomas-a-Becket, Warblington*
- Grade II\* buildings which are particularly important buildings of more than special interest – *Fort Purbrook, Church of St Mary, Church of St Faith, The Elms, The Warblington Castle and the Staunton Memorial*
- Grade II buildings which are of special interest, warranting every effort to preserve them. This grade is the most common in listing.

2.22 Listed buildings have potential to be at risk from; change of use, vacancy, lack of maintenance and in some cases, where no solution can be found for a future use, at risk from deterioration, or in some cases, pressure for demolition. Moreover, works that are not of a high-quality standard and design can result in the loss of the historic fabric, erosion of plan form and harm to the character and setting of the listed building.

2.23 This policy sets out how development proposals affecting listed buildings and their setting will be assessed. Whilst the Council promotes sensitive repair, reuse and adaptation of listed buildings, including measures addressing climate change and energy efficiency, it also places a strong emphasis on ensuring that their special interest is conserved for future generations.

### Policy 34: Listed buildings

Development seeking to maintain, sustain and enhance the significance and special architectural and historic interest of listed buildings in the Borough will be supported.

<sup>7</sup> <https://historicengland.org.uk/listing/>

Development affecting listed buildings, and/or their settings, including additions, alterations, change of use, or partial demolition must ensure that:

- a) the proposal conserves or enhances the special architectural or historic interest of the building or structure;
- b) the special interest that justified its designation is retained through a high quality and appropriate design ensuring that development will be sympathetic and compatible both the Listed Building and its setting and that of any adjacent heritage assets in terms of siting, style, scale, density, height, massing, colour, materials, architectural features and detailing of the original Listed Building or structure;
- c) any change of use is supported by evidence demonstrating its compatibility with the existing and respect of the special architectural or historic interest of the heritage asset or its setting;
- d) the demolition of objects or structures within the curtilage of a Listed Building is supported by robust evidence demonstrating that the object or structure is incapable of repair for beneficial use or enjoyment, and/or is not of special architectural or historic interest as a structure ancillary to the original Listed Building.

Proposals which would lead to substantial harm (or total loss of significance of) a listed building, will not be supported unless it can be demonstrated that the substantial harm, or total loss is necessary to achieve substantial public benefits that outweigh the harm or loss.

Proposals which would cause less than substantial harm to the significance of the Listed Building will be considered against the other public benefits to be gained, including where appropriate, its optimum viable use. The Council will give great weight to the desirability of preserving the building, its setting or any features of special architectural or historic interest.

### **How the policy will be implemented**

2.24 In assessing development affecting listed buildings or/and their setting, applications should contain sufficient information on the likely impact of the proposals in the special architectural or historic interest of the building and its setting. Applications for listed building consent or planning permission should include a Heritage Statement which explains the significance of the listed building affected by the proposals, including an assessment of the development's impact or positive contribution made by their setting. The level of detail should be proportionate to the important of the listed building. Applicants are encouraged to consult the Council's Heritage Team at pre-application stage.

2.25 Listing descriptions are not a comprehensive or exclusive record of the special interest of a listed building and will usually only describe some of the key external features which should be preserved. However, most listed buildings contain many features which contribute to their special interest, therefore applicants should seek to preserve or retain such features whenever seeking consent to undertake works.

2.26 Works to listed buildings often requires consideration of other environmental impacts. There are cases where proposed works to Listed Buildings aim to improve energy efficiency and reduce heat loss. Owners should be mindful of how this can be achieved in a sensitive manner; For example, heat loss through windows can be reduced significantly by restoring existing timber

windows or reinstating timber shutters. In other cases, roof spaces in older buildings, due to their age and construction, can often support roosting bats or house nesting birds, therefore property owners should seek to consider how they can protect existing species when proposing works such as loft conversions. To ensure compliance with the relevant policies and legislation, where proposed works to listed buildings would be reasonable and likely to impact roosting bats or other species, an ecological survey will be required and ecological conditions will be applied to granted consents.

2.27 Where planning permission or advertisement consent is required for associated change of use or alterations, an application should be submitted in parallel with the application for listed building consent.

## Policy 35: Archaeology

2.28 Archaeological remains form fragile and irreplaceable physical evidence of the Borough's past. Where development affects archaeological remains, they should be preserved in situ, and loss or harm to nationally important archaeological remains should be wholly exceptional. Where the public benefit of the proposed development demonstrably outweighs preservation of the archaeological remains in situ, the Council will seek to secure mitigation through excavation, recording and public presentation of the results.

### Policy 35: Archaeology

Applications for development on sites where archaeological remains may be present must be accompanied by an Archaeological Desk-Based Assessment (and a Heritage Statement if the site involves any designated heritage assets) demonstrating the archaeological value in the site. Where the assessment indicates that significant archaeological remains are or may be present, an archaeological field evaluation will be required. The Archaeological Desk-Based Assessment (and Heritage Statement if applicable) should define:

- a) The character, importance and condition of any archaeological deposits or structures within the site;
- b) The likely impact of the proposed development of these features; and
- c) The means of mitigating the impact of the proposed development.

Where important archaeological remains are found to exist, and can justifiably be left in situ, their protection will be required by planning condition or legal agreement.

- a) Where such remains cannot reasonably be protected in situ, a full archaeological investigation of the site including archaeological recording, formal reporting and publication of the findings, and archiving of the recovered material in a suitable repository, will be required in accordance with a scheme of work to be agreed in writing with the Council prior to the commencement of any works.

2.29 Developers are required to provide sufficient information in the initial assessment to determine whether there are any remains on site and the probable effects of the proposal on those remains, and where necessary, field evaluations in areas of known or potential archaeological interest will be required. The findings of these assessments and evaluations must be used to inform the design and layout of a proposal and must be included within a Heritage Statement which is proportionate to the significance of the archaeological asset as part of a planning application. The allocations within the Plan highlight the potential for previously unidentified archaeological remains which are not currently Scheduled, however developers should also undertake their own independent investigation to determine whether there are unidentified archaeological remains on site.

2.30 Sometimes where archaeological remains are uncovered during development, it is not possible to preserve them in situ. In such instances, with the agreement of the Council, or Historic England, as appropriate, the opportunity should be taken to record these archaeological assets, and archive and display them in a local museum where possible. It may also often be possible to

integrate or reference archaeological remains into the design when formulating proposals for new development.

2.31 Consultation of the Historic Environment Record and pre-application discussions with the Council's Heritage Officers can be used to clarify whether applications will require supporting archaeological information.

## Policy 36: Locally listed buildings and non-designated heritage assets

### Why the policy is needed

- 2.32 The NPPF recognises that non-designated heritage assets are a material consideration in the planning process, thus decision-makers should make a balanced judgment having regard to the scale of harm or loss resulting from a development proposal and the significance of the heritage asset.
- 2.33 Non-designated heritage assets in the Borough which include locally listed buildings, historic parks and gardens and other non-designated heritage structures, are of local heritage value, however they do not possess the degree of special interest needed to be added to the statutory list of buildings of special architectural or historic interest. The Council's List of Buildings of Local Interest<sup>8</sup> includes a list of buildings, structures or places of local historic interest. In addition to this, The Hampshire Gardens Trust identifies 18 historic parks and gardens<sup>9</sup> across the Borough which have been found to hold a historic, aesthetic or communal value for the local community.
- 2.34 Although locally listed buildings, historic parks and gardens and other non-designated heritage assets do not benefit from the same statutory protection afforded to those assets on the national list, the Council seeks to ensure that development proposals which may affect these assets, avoids harm to their identified significance.

### Policy 36: Locally listed buildings and non-designated heritage assets

There is a general presumption in favour of retaining non-designated heritage assets. Proposals which would result in harm to the asset's architectural and/or historic significance, will be resisted.

Development proposals which would affect the significance of a non-designated heritage asset, including any contribution made by its setting, must include the following, in a manner proportionate to the asset's significance:

- a) A description and assessment of the significance of the asset, including its setting, to determine its architectural, historical or archaeological interest;
- b) A description of the impact of the proposed works on the significance and special character of the asset; and
- c) Justification for the works, especially if these would harm the significance, character and/or setting of the heritage asset

Where development would demonstrably harm the significance and/or setting of a non-designated heritage asset, consent will be refused unless it can be demonstrated that:

- d) the level of harm or loss is justified following a balanced judgement of the scale of harm and significance of the heritage asset; and

<sup>8</sup> <https://www.havant.gov.uk/sites/default/files/documents/List%20of%20Blgs%20of%20Local%20Interest.pdf>

<sup>9</sup> <https://research.hgt.org.uk/loc/07-havant-borough-council/>

- e) any harm or loss is mitigated through the retention of features of significance and/or good design

2.35 When considering the impact of proposed development on the significance of non-designated heritage assets, or their setting, including buildings and structures on the Council's Local List and historic parks and gardens on the Hampshire Gardens Trust, the evidence supporting development proposals affecting these assets should be appropriately detailed and proportionate to the asset's importance. Applicants should refer to the Council's List of Buildings of Local Interest, in the first instance, although the list is not definitive, and the significance of a building and/or archaeological feature may only become apparent upon the submission of an application or during its determination.

## Policy 37: Improvements in Energy Performance of Historic Assets

2.36 The historic environment can contribute to climate change mitigation and adaptation. Historic buildings have an important role in reducing carbon emissions across the borough and helping to meet net zero targets. Opportunities exist to improve the energy performance of heritage assets by enhancing energy efficiency, reducing carbon emissions, and incorporating low-carbon design and renewable technologies, while conserving their significance and ensuring they remain viable places to live and work in the future.

2.37 Historic buildings can be warm, comfortable, and healthy places to live, work, and visit. Their energy performance is often better than predicted; however, a range of measures can be implemented to improve their environmental performance. Traditional buildings differ fundamentally from modern construction in the way they manage moisture, ventilation, and heat. These differences influence which energy efficiency measures are appropriate. Achieving improvements in energy performance while conserving the significance and fabric of historic buildings therefore requires a careful and considered approach.

2.38 A fabric-first approach, which prioritises improving the building fabric before installing new technologies, can provide the most effective and least harmful means of improving energy performance. Additionally, a whole-building approach should be taken to ensure that measures work together effectively and do not create unintended consequences for the building fabric.

2.39 The Council recognises the contribution that historic buildings can make to climate change mitigation and adaptation. Therefore, proposals for sensitive improvement of the energy performance of heritage assets will be supported whereby they conserve the asset's significance, including its architectural and historic interest, character, fabric and setting and can be a more delicate process than on newer homes.

### Policy 37: Improvements in Energy Performance of Historic Assets

Proposals should demonstrate that:

- a) Energy efficiency measures have been designed to minimise harm to historic fabric and significance;
- b) The most sensitive and least intrusive measures have been selected;
- c) Historic fabric and features of significance are retained where possible;
- d) Measures are reversible where practicable; and
- e) Works are compatible with the building's construction, materials and ability to manage moisture and ventilation.

Where proposals would result in harm to the significance of a heritage asset, applicants must demonstrate that the works are justified and that measures have been designed to minimise harm.

2.40 Applicants proposing measures to improve the energy performance of heritage assets should demonstrate an appropriate understanding of the building and its significance. This will normally be set out within a heritage statement. The statement should include an assessment of

the building's significance and sensitivities, as well as identifying opportunities and constraints for improving its environmental performance.

2.41 The assessment should consider opportunities to reduce carbon emissions, improve energy efficiency, and incorporate low-carbon design or renewable technologies where these can be achieved sensitively. It should outline the potential impacts of proposed measures on the building's significance and historic fabric, together with the benefits of the proposed improvements.

2.42 Proposals should be considered alongside other relevant policies in the Local Plan, including Policy XX Low Carbon Development, Policy XX Preventing Overheating, Policy XX Sustainable Construction Methods, Materials and Waste, Policy XX Water Efficiency, and Policy XX Renewable Energy Infrastructure.

2.43 For heritage assets such as Listed Buildings or structures within a Conservation Area, additional permissions may be required before works are undertaken. Early engagement with the Council through the pre-application service is encouraged.

2.44 Applicants are encouraged to refer to guidance produced by Historic England on improving energy efficiency and reducing carbon emissions in historic buildings, or any subsequent updated guidance.