

From:
To: [Bristol Local Plan](#)
Subject: Old Market Quarter Neighbourhood Development Plan
Date: 24 March 2015 11:46:10
Attachments: [RE Draft Neighbourhood Plan.msg](#)

Dear Sarah

Thank you for your consultation on the Old Market Draft Neighbourhood Plan. My apologies for not responding before now. Our comments are not materially different to those previously offered (see attached) and we hope that any additional observations can still be accommodated within the Plan preparation process.

In terms of a summary:

1. We would reiterate our congratulations to the Old Market community on the comprehensiveness and depth of their work in the coverage of the issues of concern and the understanding shown in formulating responses to them. We are particularly pleased to note how the historic character of the area is identified as an important theme in underpinning proposals for improvement which reinforce local distinctiveness and values.
2. We are pleased to see that our previous advice has been noted and amendments made to the draft Plan to make it more robust.
3. It will be important to be able to substantiate the basis for categorising the value of local buildings in section 7.2 on P22. In particular, to ensure consistency with criteria which have been devised and are being employed elsewhere throughout the city by local communities in the formulation of Local Lists.
4. We note that additional development sites appear to have been added to the schedule referred to in our previous correspondence and would reiterate point 1 in our attached letter.

Otherwise, we wish the community good fortune in the continuation of its activities.

Kind regards

David

David Stuart | Historic Places Adviser



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OMCA
c/o 14 Redcross Street
Bristol
BS2 0BA

Our ref 1338

21st November 2013

Dear Sir / Madam

Neighbourhood Plan for Old Market

Thank you for consulting English Heritage about your Neighbourhood Plan.

The area covered by your Neighbourhood Plan falls within the boundary of the Old Market Conservation Area and includes a number of important designated heritage assets including 62 Listed Buildings, one of which, Holy Trinity Church, is on our national Heritage At Risk Register. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

There are now over 600 Neighbourhood Areas and many are reaching a stage where draft Neighbourhood Plans have been prepared and are going out to consultation. English Heritage is consulted on most if not all of these, in response to the need to consult us where our interests are likely to be affected and as recognition of the fact that most areas have heritage assets of national significance.

Our advice therefore concentrates on highlighting to communities how their local heritage can underpin, and assist in the formulation of, sustainable strategies for their areas, and how proposals in turn may be able to help address heritage issues which exist. We have not previously had an opportunity to engage with the Old Market





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community but we understand that the City Council may have referred to the information available on our website and we hope that this has been useful in the formulation of the Plan.

It is therefore pleasing to see how much the heritage of Old Market is valued by its community and the extent to which it is used to positively drive the regeneration proposals for the area. The Plan displays an impressive and comprehensive understanding of the area's historic development, and how this survives to provide a sense of local identity and as the basis for contextually informed improvement. Much of the proposed agenda involves undoing past decisions, particularly relating to transport infrastructure, and reinstating or building upon lost townscape character. In this respect many of the proposals are ambitious, and we applaud your community for its courage and long-term vision.

The proposed role of the area's heritage is holistic, informing, inter alia, public realm and highways enhancements, the location of development sites, design principles, heritage trails and the advocacy of a Local List. Proposals also consider management and delivery mechanisms as part of the creation of a sustainable regime. We are happy therefore to support the overarching objectives – to revitalise and promote the area's historic character and USP, re-connect it with its surrounding area, and boost its social and economic profile to recreate a truly distinctive and viable community which adds to the overall character and interest of Bristol as a city.

Success will depend on the detailed delivery of the Plan's proposals and in this respect the document begins that process in its suggested traffic management and public realm masterplan for Old Market Street, and in the identification of development sites and the specific policies and principles intended to guide the process of physical change. Reference is made to the Local Development Plan and National Planning Policy Framework (NPPF) and how proposals have been developed mindful of this context in order to demonstrate the necessary level of conformity.



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It is likely that many development projects will need to involve us as a statutory participant in the planning process and on a pre-emptive basis we would therefore make the following observations:

1. We note the schedule of potential development sites within Section 9 (p35). We are not able to comment on the virtue of all of these due to a lack of local knowledge and we must rely on the City Council as local planning authority to confirm that development in these locations in principle and in accordance with the proposed policies and briefs is Local Plan and NPPF compliant, will not harm heritage assets, and is sufficiently informed by local historic character.
2. We have also cross-referenced this schedule with the map showing building quality on p39. We assume information on buildings within the conservation area has been drawn from the Old Market Conservation Area Appraisal but we have identified some potential development sites which contain what are Unlisted Buildings of Merit within the Appraisal (eg Policy C4 & C5). We appreciate that though seeming to be an inconsistency a “development site” does not necessarily imply the wholesale demolition of existing fabric but such ambiguity is unhelpful and the situation would benefit from rationalisation.
3. Clarification would also be beneficial in the wording of Policy B1 which at present could be regarded as somewhat hostage to fortune. This needs to be consistent with the policy guidance in the NPPF and parent Local Plan. Development – which in the context of this policy could presumably embrace the demolition of heritage assets - needs to do more than demonstrate that the historic character of a building has been “considered”. The NPPF highlights the desirability of development sustaining and enhancing the significance of heritage assets, and new development making a positive contribution to local character and distinctiveness.
4. The Conservation Area Appraisal identifies an extensive range of issues and it would be useful to ensure that these have been drawn upon sufficiently to



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provide a suitable enough steer for new development in the detailed design policy objectives.

The matters identified above can hopefully be addressed relatively comfortably and should not detract from the overall thrust and scope of the draft Plan and our broad support for its objectives. It is important therefore that we offer our congratulations to your community for what it has achieved, and express our belief that the Plan has the potential to become a robust mechanism for the sustainable heritage-led regeneration of Old Market.

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

Yours sincerely,

David Stuart

Historic Places Adviser



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