



Planning Policy Team
Brentwood Borough Council

Our ref: PL00307899

26 March 2018

Dear Sir/Madam,

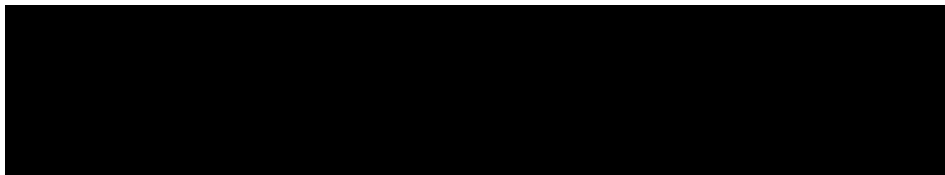
Re. Brentwood Borough Council Preferred Site Allocations reg. 18 and Interim Sustainability Appraisal (SA)

Thank you for consulting Historic England on Brentwood Borough Council's preferred site allocations. 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. Therefore we welcome the opportunity to comment on the preferred site allocations. We have now had the opportunity to review the documents and can provide the following substantive comments.

Summary of Comments:

The site pro-formas are a useful way of displaying site inset maps alongside key pieces of information about the site. The overall schedule is a helpful tool and is a good starting point for establishing the main issues that a subsequent policy will need to address. We are pleased to see that heritage assets such as conservation areas, archaeology and listed buildings have been identified. We are also pleased to see that it is the intention to follow a master planning process for a number of the larger sites. The site selection pro-forma methodology is generally sound.

We have provided comments on each individual site below but there are four sites which cause concern at this stage, with regards to the potential impacts upon the





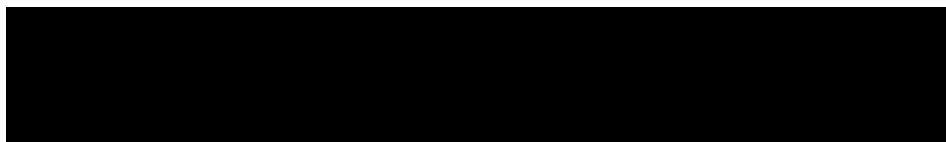
historic environment, and which could affect the soundness of the of the forthcoming plan. These are:

Site 076: Land south of Redrose Lane, north of Orchard Piece, Blackmore; and Site 077: Land south of Redrose Lane, north of Woollard Way, Blackmore –

These two sites are located side by side to the north of the Blackmore Conservation Area and adjacent to several listed buildings. The development of this site has the potential to harm the significance of these designated heritage assets by eroding their setting. We recommend that any subsequent site specific policy for these sites includes criterion to help secure a high quality development which respects the setting of the nearby listed buildings and conservation area. The policy should refer to the sites' sensitive edge of settlement location, the need for high quality design which will relate to both the rural surroundings to the north and to the historic settlement adjoining the site to the south. Careful master planning will be required to ensure the scale and density of the development is appropriate for the location. We feel that our concerns surrounding this allocation could be resolved through appropriate policy wording and criterion. This site is discussed in more detail below.

Site 083: Land west of Warley Hill, Pastoral Way – the allocation and subsequent development of this site has the potential to result harm the significance of the existing group of Grade II listed hospital buildings. The extent of harm will depend on the master planning process as some parts of the site will be more sensitive than others. For example, areas to the south west of the site, away from the historic hospital complex will be less sensitive, perhaps locating areas of open green space to serve the new development could be focused towards the listed buildings to help preserve their setting and visual linkages. We recommend that specific criterion are referred to in any forthcoming site specific policy to ensure the setting and group value attributed to these listed buildings is conserved. We feel that our concerns surrounding this allocation could be resolved through appropriate policy wording and criterion. This site is discussed in more detail below.

Site 200: Dunton Hills Garden Village Community – This site contains a number of listed buildings and is located near to a Registered Park and Garden, two scheduled monuments and a range of other Grade II* and Grade II listed buildings. There is concern that there is inadequate evidence to support the allocation of this site at this stage. We request that a Heritage Impact Assessment (HIA) is undertaken to provide a better understanding of the site and of the potential impacts upon heritage assets within the site and around its boundary. Historic Landscape Characterisation and





archaeological assessments should also be carried out. The County Historic Environment Record should be consulted as a minimum and this should form baseline evidence for this allocation. The HIA will help establish the suitability of the site, its capacity, and any mitigation measures that may be appropriate. This will then inform any master planning process and any site specific policy criterion. Until further work in this site is completed we are unable to support the allocation. This site is discussed in more detail below.

Site 187: Land south of East Horndon Hall – This site abuts the boundary of a Grade II listed building and seems to incorporate some of its curtilage buildings. There is concern regarding the proximity of development to this heritage asset and the subsequent impact upon its significance. Additional information regarding setting, character and significance will need to be provided to determine if the boundary should be pulled back, if so to where it should be located, and if any other mitigation measures may be required. This assessment should be proportionate to the significance of the heritage asset and the nature of employment development envisaged. The findings should then inform a site specific policy. Given this, we are at present, unable to support this allocation.

Comments on individual sites:

Site 041: Land at Hunter House, Western Road

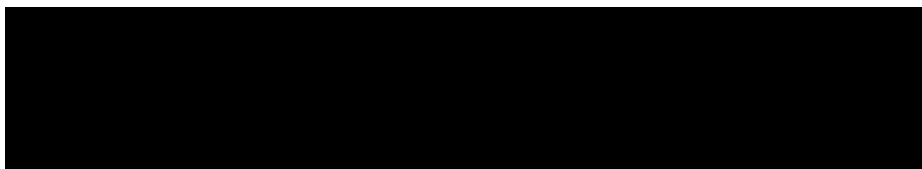
The Brentwood Town Centre Conservation Area lies to the south of the site. We are pleased to see that the site pro-forma identifies the presence of the conservation area. Development of this site will need to conserve and, where opportunities arise, enhance the conservation area and its setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 311: Eagle and Child Pub, Shenfield

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 040: Chatham Way/Crown Street Car Park

This site lies within the Brentwood Town Centre Conservation Area and next to the Grade II listed Gardeners Arms Inn. We are pleased to see that the site pro-forma





identifies the presence of the conservation area however the presence of the adjacent Grade II listed building is not. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 039: Westbury Road Car Park

This site lies immediately adjacent to the Brentwood Town Centre Conservation Area and the Grade II listed building at 120 High Street. We are pleased to see that both of these heritage assets have been identified within the site pro-forma. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. Careful consideration should be given to the height and scale of any new development in this location given its proximity to the town centre conservation area and the concentration of individual listed buildings it contains. The site is described as being a key gateway site, design should ensure that the development of this site takes opportunities to enhance the public realm, street frontage and setting of nearby heritage assets. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 186: Land at Crescent Drive, Shenfield

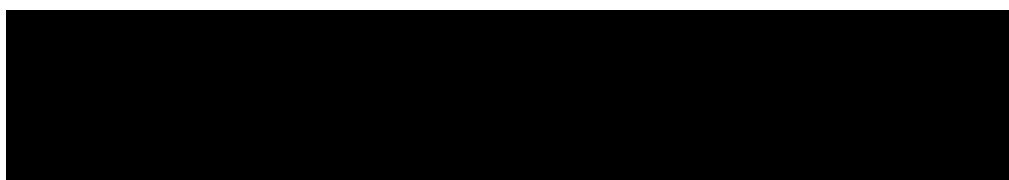
There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 003: Wates Way Industrial Estate, Ongar Road

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 081: Council Depot, The Drive, Warley

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.





Site 117A and 117B: Ford Offices, Eagle Way, Warley

The Grade II listed Blenheim House and Grade II listed Chapel of the Royal Anglian Regiment and Essex Regiment are located to the immediate west of site 117A. We are pleased to see that both of these heritage assets have been identified within the site pro-forma. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 002: Brentwood Railway Station car park

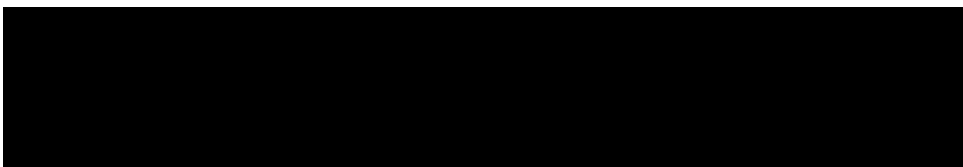
There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 102: William Hunter Way Car Park

The Brentwood Town Centre Conservation Area and the Grade II* listed White Hart Inn are located to the immediate south of the site. Whilst the pro-forma does identify the presence of the conservation area it does not reference the listed building. Given the high grade of designation Historic England would be a statutory consultee when considering the development of the site. We request that any forthcoming site specific policy identifies these designated heritage assets. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan. We are pleased to see that the edges of the site have been identified as sensitive and that development along boundaries will be low scale.

Site 020, 021, 152: West Horndon Industrial Estate, Childerditch Lane and Station Road

There are no designated heritage assets within the site. However there are a number of designations to the north of the site, namely the Scheduled former parish church and churchyard of St Nicholas, the Grade II* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area. The pro-forma does not refer to the presence of these designated heritage assets. As the site is currently an active industrial estate any enhancements that can be made are encouraged. The pro-forma outlines the aspirations for the site as a village centre where high density development is possible. Whilst this may be possible careful consideration should be





given to the scale and height of development to ensure the setting of these heritage assets is conserved. It is noted that the heritage assets are set away from site but the nature of development and its height could still impact upon the significance of these designated heritage assets. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 044 and 178: Land at Priests Lane, Shenfield

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 010: Sow and Grow, Ongar Road, Pilgrims Hatch

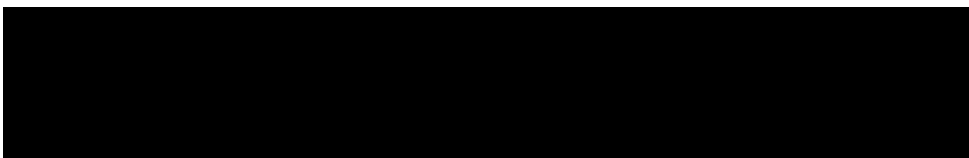
The pro-forma identifies the Grade II Registered Park and Garden (RPAG) which is located to the south west of the site. The Grade II listed buildings of Langtons and Langtons Forge, which are located along the boundary of the RPAG, however have not been referenced. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 027: Land adjacent to Carmel, Mascalls Lane

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 083: Land west of Warley Hill, Pastoral Way

The site contains the Grade II listed Tower House of Warley Hospital whilst the Grade II Lodge to Warley Hospital is located to the immediate north of the site. These two buildings form a group with the main Warley Hospital building, also Grade II listed. The hospital and its component buildings were constructed between 1851 and 1885. The layout of the hospital site and the relationship of the component buildings forming the hospital complex retain their physical relationship with each other. There is concern that the development of this site would sever the relationship of the Tower House and Lodge from the main building. The group value of these buildings is an important aspect of their significance; the buildings demonstrate the planning and evolution of a purpose-built asylum from the mid-nineteenth century to the present





day. The Tower House sits within a sparsely developed green and leafy setting, and whilst the Lodge has experienced development close by in the form of the modern dwellings on the far side of Warley Hill, it still retains a visual association with the hospital site. Development of this site could result in harm to the significance of this group of the listed buildings. We request any site specific policy for this site includes a series of criterion, including any mitigation measures that may be appropriate, to ensure the setting of these designated heritage assets will be conserved. A master planning process could help by ensuring the majority of development is concentrated to the area south of the Tower House in order to retain the cohesiveness of the group. Open space could be concentrated around the listed buildings to act as a buffer zone and to preserve their setting. The height of new development within the site should also be carefully considered so that it does not visually intrude upon the setting of the listed buildings.

Site 032: Land east of Nags Head Lane, Brentwood

The Grade II listed Nags Head public house sits to the immediate northwest corner of the site. We are pleased to see that the presence of the designated heritage asset has been identified within the pro-forma. Development of this site will need to conserve and, where opportunities arise, enhance this heritage asset and its setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 022: Land at Honeypot Lane, Brentwood

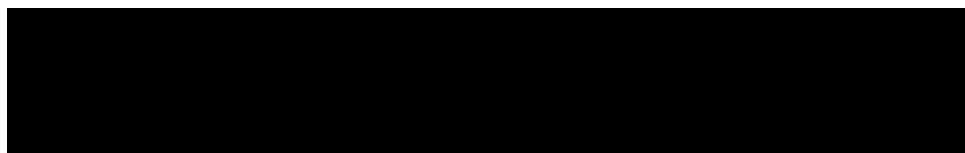
There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 023A and 023B: Land off Doddinghurst Road, either side of A12 Brentwood

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 263: Land east of Chelmsford Road, Shenfield

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.





Sites 087, 034, 235, 276: Officer's Meadow, land off Alexander Lane, Shenfield

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 158: Land North of A1023 Chelmsford Road, Shenfield

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 128: Ingatestone Garden Centre, Roman Road, Ingatestone

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 079A: Land adjacent to Ingatestone by-pass

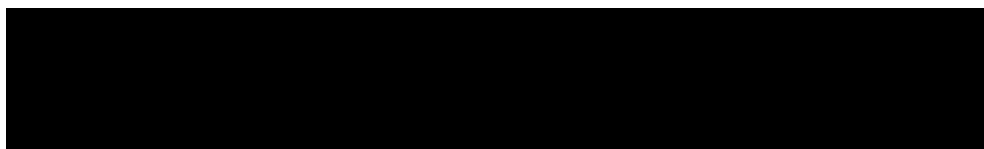
There are no designated heritage assets within or near to the site. However, the site lies immediately adjacent to a Roman Road which increases the likelihood of potential archaeological remains. We are pleased to see that the pro-forma has identified this and the need for archaeological investigations to be carried out prior to development. We request that this is included as a criterion within any site specific policy.

Site 106: Site adjacent to Ingatestone Garden Centre (former A12 works site)

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 076: Land south of Redrose Lane, north of Orchard Piece, Blackmore

Two Grade II listed buildings, The Woodbines and Horselocks Cottage, sit to the immediate west of the site. The Blackmore Conservation Area is to the south of the site, the conservation area contains a number of individual listed buildings. The pro-forma has not identified the presence of the heritage assets. Any development of the site will need to be sensitive to this edge of settlement location and relate to the open landscape around it as well as to the historic settlement it adjoins. The surrounding land is of historic interest and also makes a positive contribution to the character and





appearance of the conservation area. The cumulative impacts of the development of this site and that of site 077 must be taken into account in order to ensure the setting of these listed buildings and conservation area is not compromised. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 077: Land south of Redrose Lane, north of Woollard Way, Blackmore

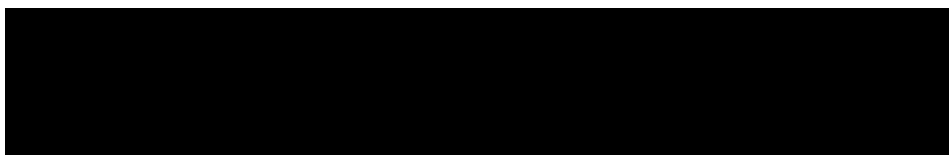
Two Grade II listed buildings, The Woodbines and Horselocks Cottage, are located to the immediate east of the site whilst the Grade II listed Wells Farmhouse is located to the north of the site. As with site 076 above, the Blackmore Conservation Area is to the south of the site, the conservation area contains a number of individual listed buildings. The pro-forma has not identified the presence of the heritage assets. Any development of the site will need to be sensitive to this edge of settlement location and relate to the open landscape around it as well as to the historic settlement it adjoins. The surrounding land is of historic interest and also makes a positive contribution to the character and appearance of the conservation area. The cumulative impacts of the development of this site and that of site 076 must be taken into account in order to ensure the setting of these listed buildings and conservation area is not compromised. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their setting. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.

Site 075B: Land off Stocks Lane, Kelvedon Hatch

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation. Any development of the site will need to be sensitive to this edge of settlement location and relate to the open landscape around it as well as to the settlement it adjoins.

Site 194: Brizes Corner Field, Blackmore Road, Kelvedon Hatch

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation. Any development of the site will need to be sensitive to this edge of settlement location and relate to the open landscape around it as well as to the settlement it adjoins.





Site 294: Chestnut Field, Blackmore Road, Hook End

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 085B: Land adjacent to Tipps Cross Community Hall, Blackmore Road

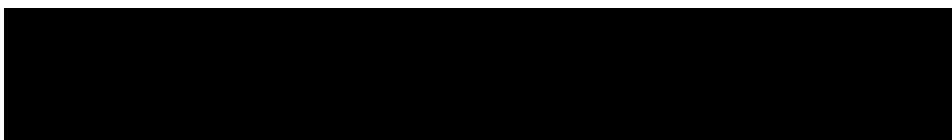
There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 200: Dunton Hills Garden Village Community

This site is a large allocation and is intended to form a new settlement of 4,000 dwellings. The site contains three Grade II listed buildings; these include Dunton Hall, Dunton Hills and the Church of St Mary. In addition to these listed buildings within the site, it is surrounded by a range of other designated heritage assets including; the Grade II* listed Church of All Saints which has itself a Grade II listed monument and stables, the Grade II listed Lower Dunton Hall, Wayletts, Barnards, the Thorndon Park Conservation Area, the Grade II* listed Registered Park and Garden (RPAG) of Thorndon Hall; and two scheduled monuments – Old Thorndon Hall and Gardens and the Former Parish church and churchyard of St Nicholas.

It is acknowledged that some of these surrounding heritage assets are severed from the site by the A127 however development of the site still has the potential to impact upon the setting of the RPAG. It is also not clear how the listed properties within the site are to be treated. The pro-forma does not identify any of these designated heritage assets and it is not clear what evidence has been provided to support this allocation. There is concern that the development of this site has the potential to harm the significance of a number of designated heritage assets. The detailed consideration of setting will be a matter of material importance when considering the impact of development upon the significance of nearby assets.

As well as these designated heritage assets, any consideration of development on this site would also need to include an assessment impact on undesignated heritage assets, including buildings on the Local List that may be located within or in close proximity to the site. That assessment would need to include a consideration of the archaeological potential of the site and the County Archaeologist will be best place to advise on such matters.

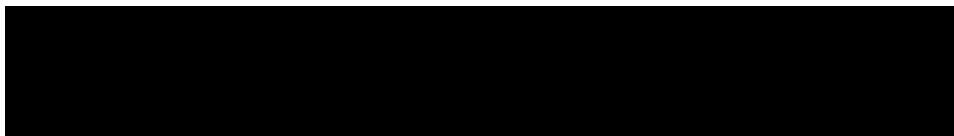




The Sustainability Appraisal indicates that this site performs particularly badly in terms of its impacts upon listed buildings and it is not clear what methods are being employed to reconcile this result with the allocation. Given the sensitive nature of the site and given the lack of supporting evidence on the historic environment, we request that a Heritage Impact Assessment is undertaken in accordance with our advice note '*Site allocations in Local Plans*'. The HIA should determine the appropriateness or otherwise of the site for development, the extent of the development and therefore potential capacity of the site, the impacts upon the historic environment (considering each asset and its setting and its significance), impacts of development upon the asset and any potential mitigation measures necessary to accompany the proposals. Appropriate criteria for the protection of heritage assets and their settings need to be included in each of the policies and supporting text for the Garden Village in the emerging Plan.

It is imperative to have this robust evidence base in place to ensure the soundness of the emerging Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too. The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

Historic England also recommends that further archaeological investigation is undertaken as well as landscape characterisation work to inform the evidence base. Essex County Council holds a series of Historic Landscape Characterisation Studies which will be a useful starting point and should form part of the evidence base to support this allocation. We note that some characterisation studies from 2006 have been provided in the list of evidence but in order to be meaningful this should be distilled down to refer to the broad area in question. Characterisation work will be fundamental to understanding the capacity of development in the Dunton Hills Garden Suburb. Additional characterisation and archaeological investigations could be amalgamated into the HIA or can form separate documents.





Site 101A: Brentwood Enterprise Park (former M25 Works Sites at A127/M25 junction 29)

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 101C and 101D: Land at Codham Farm

There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 112A, 112D, and 112E: Childerditch Industrial Estate Extensions

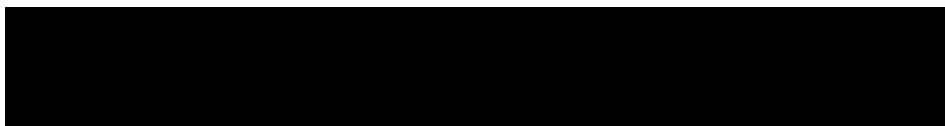
There are no designated heritage assets within or near to the site. Historic England has no comments to make on this site allocation.

Site 187: Land south of East Horndon Hall

The Grade II listed East Horndon Hall sits to the immediate north of the site and it appears that some of its curtilage buildings fall within the site. We are pleased to see that the presence of the designated heritage asset has been identified within the pro-forma. Development of this site will need to conserve and, where opportunities arise, enhance this heritage asset and its setting. There is concern that the extent of the site and the position of development will harm the setting of this designated heritage asset. Further information is required in order to justify this allocation. We recommend that the site boundary is pulled southwards away from East Horndon Hall or that policy criteria are in place to ensure mitigation measures are implemented. Further investigative work will be required to determine what sorts of mitigation measures will be appropriate and where the boundary of the site should be located. This does not need to be extensive as a full Heritage Impacts Assessment but a proportionate assessment of the heritage asset's setting and character will be required to support the allocation of this site.

Site 078C: Land adjacent to Ingatestone by-pass

There are no designated heritage assets within or near to the site. However, the site lies immediately adjacent to a Roman Road which increases the likelihood of potential archaeological remains. We are pleased to see that the pro-forma has identified this archaeological potential. It is recommended that archaeological





investigations are carried out prior to development. We request that this is included as a criterion within any site specific policy.

General comments:

There are a number of aspects that should generally be considered when progressing site allocations and site specific policies. We have provided general comments below on some of the key points which we hope will be helpful. Policies which include robust provision for the conservation or enhancement of the historic environment can also help achieve a number of other spatial planning or place making goals.

Green Infrastructure

Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make further reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing landscapes or green spaces in towns or existing historic spaces such as church yards, tow paths, verges etc. as well as larger designed landscapes to improve the setting of and access to historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

Setting

We expect to see appropriate references to setting in policies. As with assessing the impact of site allocations on setting, with a site specific allocation, it is important to understand the significance of any heritage asset/s, and their setting/s, that would be affected by the site allocation in order for the policy to reflect these considerations. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling





heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. We would expect to see this reflected in the policy wording and supporting text.

Green Belt

One of the five purposes of the Green Belt is to preserve the setting and special character of historic towns. Historic towns and former towns are situated across the region and should form a consideration in any review of Green Belt.

Without an appreciation of the history of the region's historic settlements and their close relationship to their surrounding landscapes, it is not possible to properly ascribe a value to the openness of the Green Belt land around them. Consideration of the value of the Green Belt requires understanding the historic significance of this open landscape.

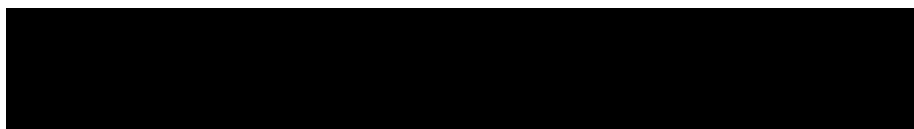
Whilst Green Belt reviews often divide the area into parcels of land to make the assessment exercise manageable, parcels should not be solely reviewed individually within their immediate context. It also is important to understand how collectively they achieve the strategic aims of the Green Belt.

Healthy Lifestyles

The continued protection or enhancement of the historic environment can contribute to the provision of high quality places in both rural areas and towns/villages which can impact upon wellbeing. Parks and gardens often have historic links which can help improve the experience of the place for those visiting or using it. The use of historic spaces for recreational or leisure purposes may encourage people to visit and thus help promote knowledge of local historic places.

Design

We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. Most particularly, we seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design.





Streetscape

For streetscape improvements we would refer you to the Streets for All East of England publication: <https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/>; the Streets for All case studies series: <https://www.historicengland.org.uk/advice/caring-for-heritage/streets-for-all/case-studies/>; and our advice for highways engineers and designers: <https://www.historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/>.

Further Guidance on Site Allocations:

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your plan preparation process:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

The Setting of Heritage Assets - Good Practice Advice in Planning 3 (2nd ed)

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Comments on Interim Sustainability Appraisal (SA)

Historic England has published guidance on Sustainability Appraisals, which contains details on baseline information, sustainability issues and objectives, indicators and monitoring. This document can be found here:

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>





Key issues/objectives

Heritage is identified as a key sustainability topic. We would recommend that the term “*historic environment*” is used instead as it encompasses all aspects of cultural heritage and would achieve a more robust assessment of impact to a wider spectrum of relevant variables. Setting can be an important aspect of significance. Within this category we would expect to see reference to the setting of heritage assets within the SA objectives. The objective should be amended to include reference to the settings of historic buildings, designated and non-designated heritage assets and archaeological sites.

Indicators and Monitoring

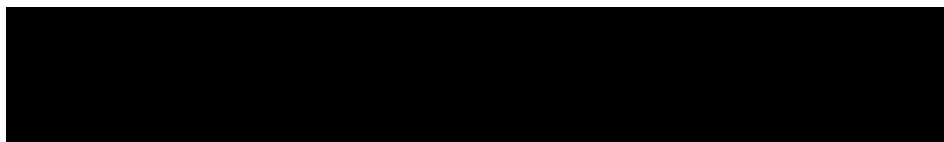
The Interim SA contains no information on monitoring and indicators. The SA is the principle tool for monitoring the effects of a local plan in operation. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan’s implementation. Guidance on indicators and monitoring in respect of the historic environment can be found in advice note listed earlier in this letter.

Conclusions

In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our



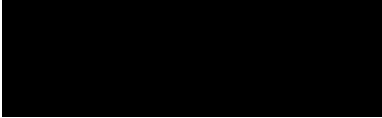


Historic England

obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Should you have any queries on the above, please do not hesitate to contact us.

Sincerely



Katie Parsons
Historic Environment Planning Advisor

