

Dear Sir/Madam,

Brentwood Borough Council Community Infrastructure Levy – Draft Charging Schedule published for public consultation

Thank you for consulting us on the Council's Draft Charging Schedule – an important source of funding for the infrastructure required to underpin the delivery sustainable development in the Borough. 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.

Funding infrastructure

Paragraph 190 of the NPPF requires that local authorities set out in their Local Plan, a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In relation to CIL, this means ensuring that the conservation of its heritage assets is taken into account when considering the level of the CIL to be imposed so as to safeguard and encourage appropriate and viable uses for the historic environment.

There is a wide definition of CIL in terms of what may be required. Historic England encourages charging authorities to consider identifying the ways in which CIL can be used to implement Local Plan policy and proposals relating to the conservation of the historic environment, heritage assets and their setting. This will help to satisfy national planning policy paragraph 190.

Discretionary Relief for Exceptional Circumstances

The Regulations emphasise the need to strike an appropriate balance between the opportunities of funding infrastructure from the levy and the potential effects that may arise through increased pressure on the economic viability of development. For example, there could be circumstances where the viability of a scheme designed to secure the reuse and long term viability of a heritage asset is compromised by the requirement for CIL payments.

It is now well established that heritage is not an adjunct to a healthy economy, an important component of growth and a source of employment. Vacant or underused heritage assets not only fail to make a full contribution to the Borough's economy but they also give rise to negative perceptions about an area. This, in turn, can detract from its attractiveness to visitors and inward investment. Consequently, in setting thresholds there needs to be a clear understanding of the potential impact which CIL could have on investment in, and regeneration of, historic areas - particularly those which have been identified as being 'at risk'.

We are therefore encouraging local authorities to assert their right to apply discretionary relief for exceptional circumstances; where development which affects heritage assets and their settings and/or their significance, may become unviable if it

was subject to CIL, or where CIL relief would enable the restoration of heritage assets as identified on Historic England's 'Heritage at Risk Register'.

Conclusion

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 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.

If there any issues you wish to clarify or discuss please don't hesitate in contacting me.