



ENGLISH HERITAGE

EAST OF ENGLAND

Planning Policy Team  
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By email only

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10 February 2015

Dear Sir or Madam

### **Brentwood Strategic Growth Options Consultation (January 2015)**

Thank you for your letter dated 5 January consulting English Heritage on the above document. We would like to make the following comments

#### **Q1: Do you agree with the three broad areas for the purposes of considering approaches to growth?**

We do not have a strong view on the division of the borough into three broad areas, which we recognise is to help consider growth options. As paragraph 2.13 notes, each of the areas should not be considered in isolation. In the case of the historic environment, specific heritage assets might be shared between more than one area (e.g. Thorndon Hall Registered Park and Garden), and so could be impacted on by growth proposals in each area.

#### **Q2: Do you agree with the issues raised for each of these three areas?**

We broadly agree with the issues raised for each area in paragraphs 2.14 to 2.19. The historic environment forms an important part of the issues and options for each area in terms of where to potentially locate new development. This includes designated heritage assets but also non-designated assets such as sites of archaeological interest. We would expect proper assessment of the historic environment and potential impacts when making decisions about where to locate development.

#### **Q3: Do you have any comments on the appropriateness of particular sites?**

Due to time and resource constraints we have not been able to assess every site in great detail. Our comments on the sites have been based mainly on desk-top analysis, and we have not been able to judge the potential impacts more accurately on the ground. Even with the strategic sites, we have only been able to carry out rapid site visits in limited cases and have not had the opportunity to ascertain precise impacts. We have focussed on those sites with the potential for the greatest historic environment impact. This does not

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mean there are no issues with any other site and we reserve the right to comment further on any site as and when proposals develop.

Please note that we have not considered areas of archaeological interest beyond scheduled monuments in most cases, nor have we looked at historic landscape issues beyond registered historic parks & gardens. However, wider archaeological and landscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could cause significant harm to the historic environment. Advice from conservation and archaeological staff at borough and county levels should be sought, along with consultation of the County Historic Environment Record (HER) for specific heritage assets.

In terms of site assessments in relation to heritage assets, care should be taken to 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.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternative sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

#### **Q4: Which of the sites along the A127 Corridor is the best location for growth?**

The document notes the potential for larger growth opportunities in the A127 corridor, with a residential-led mixed use allocation at West Horndon or a cross boundary development at Dunton (English Heritage has responded separately to the Dunton Garden Suburb consultation). The consultation suggests that development would only occur at either West Horndon or Dunton, but in the event that both are pursued, we would have reservations about the cumulative impact and extent of urbanisation along the A127 corridor, which could harm various heritage assets. We would expect in such a scenario for an adequate buffer between West Horndon and Dunton and important heritage assets.

Within West Horndon site 038B includes the southern limits of the Thorndon Hall Registered Park and Garden (Grade II\* listed) and Thorndon Park Conservation Area. This southerly projection is separated from the main Park and Garden and conservation area by the A127, but the issue of severance

must have been considered at the time of designation (in 1987 and 1993 respectively). Housing development on the designated area would result in harm to its character and appearance, and development abutting its boundaries might also result in a degree of harm.

On site 162 at Little Warley there is a proposal for an elderly care facility. This site abuts Little Warely Hall, which dates from the early 16<sup>th</sup> century and is listed at Grade II\*, together with the Church of St Peter, which dates from the 15<sup>th</sup> and 17<sup>th</sup> centuries and is listed at Grade I. Development of an elderly care facility on this site is likely to adversely impact on the setting of both these highly graded heritage assets. Sites 058A and 058B on the east side of Little Warely Hall Lane are also in close proximity to these assets, but well designed and appropriately scaled housing may be less harmful compared to the current recycling and HGV operations on site 058A.

**Q5: Should the A12 Corridor accommodate growth by releasing sites on the edge of urban areas?**

The report notes that brownfield land within the urban areas might be efficiently developed in order to minimise pressure on Green Belt releases. English Heritage broadly agrees with this approach, though we note that a number of brownfield sites are in close proximity to designated heritage assets and the design of any developments would need to have special regard to the setting of these assets.

In terms of releasing sites on the edge of urban areas, this again depends on the exact location in terms of impact on the historic environment. Very significant areas of green belt land to the east and southeast of Hutton/east of Ingrave and Herongate is included in the report and much of this land has implications for a large number of heritage assets. The Sustainability Appraisal seems to underplay the impact of this location on the historic environment, ranking it third out of five potential options for strategic growth. We would argue that it ranks lower than that.

On the extreme eastern edge of Hutton is the Hutton village conservation area. This conservation area has an open rural setting apart from where it abuts existing housing on the northern half of its western boundary, and includes Hutton Hall (Grade II\* listed) and the 14<sup>th</sup> century Church of All Saints (Grade II\* listed) plus a number of other buildings listed at Grade II. The conservation area also includes areas of open land that make a positive contribution to its character and appearance. Development sites 033, 211 and 219 all lie within the conservation area and English Heritage cannot see how they could come forward for development without resulting in significant harm to the character or appearance of the conservation area, as well as adversely impacting on the setting of some of listed buildings. Sites 008, 008B and 008C are all likely to adversely impact on wider setting of the conservation area and the more immediate setting of Hutton House, along with its walled garden and stables (all listed at Grade II). Site 028C is a large site that abuts the south east and southwest boundaries of the conservation area, where development is likely to result in harm to the rural character and appearance of the conservation area and would also have the potential to adversely impact on the setting of the Church of All Saints and Hutton Hall

(both Grade II\* listed). The western boundary of Site 028C also abuts the boundary of Heatleys, a 16<sup>th</sup> century Grade II house, and development in this area would have implications for the setting of this house.

Sites 028A and 028B abut the southeast built edge of Hutton. Development in this area would have implications for the setting of a number of listed buildings including Hare Hall (Grade II listed) Heatleys (Grade II) listed and Kennel House (Grade II listed). It may also have implications for the wider setting of the Thorndon Park Conservation Area and Thorndon Hall Registered Park and Garden (Grade II\*), as well as longer views out from Thorndon Hall (Grade I listed).

Site 192 is another large site which adjoins the south of site 028C and is located to the east of Ingrave and Herongate. This site completely enclosed a scheduled moated site at Heron Hall, together with the 17<sup>th</sup> century Grade II listed Hall and stables and the Grade II\* listed granary. This complex of heritage assets currently enjoys a remote rural setting, and historically the medieval house sited within the moat would have commanded all this surrounding land. Development of the land around these heritage assets would therefore result in significant change to their setting and harm to their significance.

Site 212 is located to the southwest of the Great Warley conservation area and, while this site is unlikely to have an impact on the conservation area, it has the potential to adversely impact on the setting of the Thatched Cottage and The Squirrels (both dating from the 19<sup>th</sup> century and listed at Grade II). This site currently comprises Coombe Wood, which would appear to be of some landscape and ecological value. Northwest of Great Warley is site 167. Again this site is sufficiently remote from the conservation area and Registered Park and Garden, but abuts the northern boundary of Hill Cottage (Grade II listed) and is in relatively close proximity to Great Ropers, an 18<sup>th</sup> century house listed at Grade II\*.

Site 218 on the edge of Shenfield lies close to a cluster of listed buildings at Shenfield Hall, including the Grade II hall and Grade II\* Church of St Mary. There should be assessment of potential impacts.

**Q6: In the North of the Borough, is it preferable to release greenfield or brownfield sites?**

As noted in the document, the North of the Borough is made up of a collection of villages set amidst attractive landscape (although it is wrong to simply consider the landscape as 'natural', as it will contain many historic elements). In terms of specific sites:

**Blackmore**

The village includes a designated conservation area that contains a number of listed buildings forming this historic core of the settlement and some open land of historic interest that also makes a positive contribution to the character and appearance of the conservation area.

Site 052 is located in the conservation area on land to the rear of Little Jericho. Little Jericho is a grade II listed house dating from c1600 and the vacant barn/farm buildings to its rear may be curtilage listed. They may also make a positive contribution to the character and appearance of the conservation area. Whilst a scheme for the careful adaptation of the farm buildings into residential use may be acceptable, their demolition and wholesale redevelopment of the site could well result in harm to the historic environment.

Site 202 is located immediately adjacent to the western boundary of the conservation area and the loss of open rural views out of the conservation area (especially from the path that defines this boundary of the conservation area) is likely to be harmful to the character and appearance of the conservation area. Site 199 is to the northeast of the conservation area and would be less likely to impact on its setting, especially if the southern edge of the development was given a soft and green boundary.

Sites 076 and 077 are both further away from the conservation area, but both have Grade II listed buildings in close proximity, and development could adversely impact on the setting of these listed buildings. It might be possible to bring forward development on both sites that successfully addresses the issue of setting for these listed building, but it would be necessary to first understand how setting contributes to their significance.

### **Hook End**

While there is not conservation area in Hook End, there are a number of Grade II listed buildings that might be affected by development proposals. A number of these listed buildings are farmhouses that would historically have been linked to the adjacent open farmland. Loss of this open farmland could therefore impact on their significance. In particular site 174 is immediately to the west of a collection of three Grade II buildings comprising Hook End Poultry Farmhouse, brewhouse and barn, while Site 183 is to the south west of Barfield Farmhouse and south east of Deal Tree Farmhouse. Other sites that may have implications for the setting of designated heritage assets include 209 (impacting on the Soap House, Grade II), 056A & 056B (impacting on The Cottage, Grade II) and 196 (impacting on a cluster of Grade II listed assets comprising a pump, cartlodge, granary and Wyatts Farmhouse).

### **Thoby Priory**

Site 018 incorporates the ruins of Thoby Priory, which is a Scheduled Monument and listed Grade II. The priory ruins are also on the English Heritage 'at risk' list. The priory would have been sited in a remote location suitably for the contemplative life, but that setting has been compromised in recent years. English Heritage accepts that a development with housing located to the west and north of the designated assets, whilst retaining an open aspect to the south and east, could be acceptable, especially if it also provided for the improved management of the heritage assets.

### **Kelvedon Hatch**

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A number of possible sites are identified around the periphery of Kelvedon Hatch. Those on the east side of the settlement have minimal implications for the historic environment. There are a number of designated heritage assets (both listed and scheduled) on the west side of the settlement, but most of these are to the west of A128 and are therefore likely to be adequately buffered from developments on sites 217 and 194, which are located on the east side of the A road. There is a smaller site at 074 which may have implications for the setting of St Nicholas's Church (Grade II). This church is currently sited on the edge of the settlement and enclosing its open aspect to the south might result in a degree of harm.

**Q7: Do you agree that the most sustainable approach to employment need is to allocation new sites close to the strategic highway network?**

The map on page 22 of the document identifies a number of potential employment sites. These sites are generally located in close proximity to existing transport corridors and/or adjacent to current employment sites, and the majority will have little adverse impact on designated heritage assets. The exceptions are sites 109 and 187, which are adjacent to East Hordon Hall (16<sup>th</sup> and 18<sup>th</sup> century and Grade II listed). While the setting of the Hall has already been compromised by the A127 (which passes immediately to the north) and the existing employment land to the east of the Hall, further employment buildings in close proximity would exacerbate the existing harm.

**Q8: Do you agree that a town centre first approach should be taken to retail development?**

We broadly agree with this approach as it should help to maintain the vitality of town centres which in turn can benefit heritage assets within these locations. It will depend on specific proposals and their impact, but there are opportunities in places like Brentwood Town Centre to secure enhancements. In terms of retail site options for Brentwood Town Centre, our 2013 comments have highlighted specific heritage assets for some of the sites shown in this consultation. In many respects, Site 100 (Baytree Centre) is the most important in terms of opportunities to enhance the historic environment, given its access off the High Street from within the conservation area, and the proximity of several listed buildings plus a scheduled monument (the chapel). We would welcome further discussions regarding this site.

**Q9:** No comments

**Q10: Landscape value**

Section 5 of this consultation puts heritage into a separate category detached from other environmental considerations, rather than include it as part of the overall environmental picture. Figure 15 should include designated heritage assets, particularly conservation areas, scheduled monuments and registered parks and gardens. We note the intention to produce further assessment of landscape capacity surrounding urban areas in paragraph 5.6. We strongly recommend that this assessment includes the historic environment as a key component of landscape capacity. Our comments on specific sites reveal the extent of heritage assets surrounding the urban areas, and this should be considered in any decisions on suitable sites. The Local Plan evidence base

does not appear to contain any specific references to the historic environment, and we recommend this is addressed.

**Q11:** No comments

**Q12: Infrastructure Issues**

The provision of new or improved infrastructure such as transport can have implications for the historic environment in terms of impact on specific heritage assets. The Infrastructure Delivery Plan and related work should consider such issues. In addition, the historic environment can form part of different types of infrastructure, from community facilities to historic transport structures. It also contributes to green infrastructure, which is more than just the natural environment. Publicly accessible parks and gardens, archaeological sites and spaces within conservation areas and listed buildings can all form part of existing and proposed green infrastructure networks, with opportunities to conserve and enhance such elements.

**Q13:** No comments

We hope that the above comments are of assistance. If you have any queries or would like to discuss specific points, please do not hesitate to contact me.

Yours sincerely



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