



ENGLISH HERITAGE

EAST OF ENGLAND

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Our Ref: HD/P 5211  
Your Ref:

23 October 2013

Dear Ms Candler

**Brentwood Local Plan 2015-2030 Preferred Options Consultation  
Interim Sustainability Appraisal Report**

Thank you for consulting English Heritage on the draft Local Plan for Brentwood and the interim Sustainability Appraisal.

**General comments**

The historic environment is identified in the National Planning Policy Framework (NPPF) as a strand of sustainable development within the environmental matters deserving consideration. The Framework states that gains in all dimensions of sustainable development should be sought jointly and simultaneously. We are pleased to see that the historic environment has been integrated into many of the plan policies.

We note that the plan is intended to be strategic in nature, and that this applies to the allocation sites. As a general comment, we would recommend that advice is sought at this stage from Essex County Council regarding the potential archaeological interest of sites, so that this can be taken into account at the earliest opportunity. We have not in these comments assessed the impact of development on heritage assets in the site allocations but we would be pleased to provide further advice on those sites where sensitivity is identified.

The plan sets out four policies as part of the Spatial Strategy, and then Core Policies, Development Management Policies and topic-based policies follow. Bearing in mind the advice in paragraph 184 of the NPPF that Neighbourhood Plans must be in conformity with strategic policies, it would be helpful to identify which these are in the plan. We suggest that in view of the very broad nature of the first four policies in the plan, that all the local plan policies might

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usefully be considered to be strategic to ensure an appropriate level of guidance for community planning.

Lastly, it would be suitable to consider overall whether the plan policies individually, and collectively, represent a positive strategy for the historic environment as envisaged in paragraph 126 of the NPPF. You may wish to consider preparing a heritage strategy to underpin the local plan policies.

Our detailed comments are set out in the attached schedule. I hope you find them useful.

Yours sincerely

Katharine Fletcher  
Historic Environment Planning Adviser

**Brentwood Local Plan 2015-2030**  
**English Heritage comments on specific policies**

**Chapter 3: Core Policies**

**Policy CP2: Managing Growth, p30**

We welcome part f) referring to well designed places that respect local character

**Policy CP9: Protecting the historic and natural environment and landscape character, p43**

This policy is welcome. In part c) it would be appropriate to add '...and their settings *in order to conserve their significance*' to align the wording with the language of the NPPF. The policy could also indicate how the Council will actively pursue a positive strategy for the historic environment (para 126, NPPF). The last paragraph goes some way towards this, but reference could, for instance, be made to ensuring that heritage assets are kept in viable use, and their future not put in jeopardy by unsympathetic development. It would be helpful to consider preparing a heritage strategy to underpin, and inform, the local plan policies for the historic environment.

We suggest the indicators (p46) for the historic environment should include the number of heritage assets at risk (Listed buildings/conservation areas, scheduled monuments/Parks and Gardens)

**Policy CP15: High Quality Design, p67**

We welcome the references to new development being sympathetic to its context and local distinctiveness. The NPPF makes links to the historic environment and new design, and it would be suitable to refer more explicitly to this relationship in the policy, and the supporting text. For instance, the NPPF states that planning policies should ensure that new developments respond to local character and history (para 58), and 'should address the connections between people and places and the integration of new development *into the natural, built and historic environment*' (para 61).

**Policy CP16: Enjoyable and Quality Public Realm, p69**

We welcome this policy.

**Chapter 4: Development Management Policies**

**Policy DM1: General Development Criteria, p75**

While we welcome part g), it should read 'great weight will be given' to reflect para 132 of the NPPF appropriately. We suggest that this sentence should be extended at the end to include 'or enhancement'.

**Policy DM4: Telephone Exchange, p81**

We welcome the proposal to redevelop a building which detracts from the conservation area. It will be important that the replacement building is of appropriate scale as well as design.

### **DM16: Re-use and Residential Conversions of Rural Buildings**

We welcome the qualification in this policy relating to traditional rural buildings. In the paragraph following part B) we suggest that the following amendment is made: ‘...compatible with the historic character and significance, and the structural integrity..’

### **Policy DM20: Listed Buildings, p118**

We welcome this policy, however, the wording would benefit from some changes to align it more closely to that in the NPPF. In the first sentence we suggest the following change: ‘...where these are sympathetic to its character, setting *and significance*.’

The paragraph following part d) seems unnecessary as this is an administrative action and gives undue prominence in the policy to demolition (which is an exceptional occurrence). The final paragraph could be re-worded as follows:

‘Changes of use of Listed Buildings and any associated works of alteration will be permitted if this would be in the interests of the restoration, retention or maintenance of the building and/or group of buildings, and there would be no adverse effect on their significance, including the historic, spatial or structural integrity of the building or its setting’. The comments above in relation to viable use (policy CP9) might be incorporated here.

### **Policy DM21: Preservation and Enhancement of Conservation Areas, p122**

We welcome this policy. The indicators on p124 could refer to the number of conservation areas at risk.

### **Policy DM22: Ancient Monuments and Archaeological Remains, p124**

We welcome this policy. In the first paragraph we suggest that the wording is slightly amended to read ‘...which would adversely affect *the significance* of a scheduled monument ...’

On page 126 we recommend that the number of scheduled monuments at risk is added as a further indicator. This information is available from the national register published by English Heritage.

### **Additional policy**

We recommend an additional policy addressing the conservation and enhancement of Registered Parks and Gardens of special Historic Interest.

### **Policy DM23 Housing Land Allocations – Major Sites, p128**

We note from the Strategic Environmental Assessment report that several of the sites lie within or adjacent to conservation areas. As noted in the appraisal this is not necessarily an impediment to development and can sometimes result in enhancement. We have not at this stage assessed these sites, and we may wish to comment further. We note also that a few sites could affect listed buildings and one scheduled site. The sites for which potential impacts/constraints are identified are:

Option 6 – Land r/o 10-20 Orchard Lane, Pilgrim’s Hatch (19 dwellings), p65

The site contains listed buildings.

Option 9 – Westbury Road car park, Westbury Road, Brentwood, p68  
The site borders Brentwood Town Centre CA

Option 10 – Chatham Way/Crown Street Car Park, Brentwood, p69  
The site is within Brentwood Town Centre Conservation Area

Option 11 – Land at Hunter House, Western Road, Brentwood, p70  
The site borders Brentwood Town Centre CA

Option 14 – The Baytree centre, Brentwood, p73  
The site is partly in the High Street CA, it contains a listed building and a scheduled monument.

Option 18 – Land at Bell Mead, Ingatestone, p77  
The site is in Ingatestone High Street CA

We would be pleased to offer further advice on these potential site allocations. However, we trust that local conservation staff, including the county archaeological service, have been consulted.

#### **Policy DM34: Floodlighting and Illumination**

We welcome the qualification in this policy relating to protection of historic character

#### **Policy DM36: Sustainable Drainage, p165**

Sustainable drainage systems should take account of potential impacts on heritage assets, especially undesignated archaeology that may be harmed by excavation for water storage or, in the case of organic remains, by changes in the water table.

#### **Implementation**

We welcome the indicators identified for policies CP9, DM20 and DM21. For policy DM22 it would be suitable to include an indicator monitoring the number of scheduled monuments at risk. This information is available from English Heritage's national Heritage at Risk Register, which can be accessed on our website. We also suggest above the addition of a policy for registered historic parks and gardens, and we would suggest that the number of parks and gardens at risk should be included as an indicator.

#### **Interim Sustainability Appraisal Report**

Section 9 Key Issues for the Appraisal

Table 9.1, Cultural Heritage – We suggest that the first bullet is amended to read '....assets must be given protection relative to their *significance*'

Section 18 Housing/Mixed use site allocations – we note the potential cultural heritage impacts that are identified. We may wish to provide further comment on these sites.