

Background Note on Section 1 Garden Community and Historic Environment Issues

Introduction

The North Essex Authorities (NEAs) and the Historic England are in discussions regarding a Statement of Common Ground. In order to ensure that the Inspector is aware of the wider context of that Statement of Common Ground, this note sets out the steps that the NEAs have taken to consider heritage assets and explains how that has fed into the plan preparation and Additional Sustainability Appraisal work.

Historic England has raised concerns regarding the adequacy of the evidence base supporting the proposals for Garden Communities. The NEAs consider that the work undertaken on historic environment issues provides a sufficient and proportionate evidence base for the strategic level Section 1. The NEAs recognise and agree that the detailed planning for the Garden Communities should be underpinned by a comprehensive understanding of the historic environment. To evidence their commitment to ensuring that future masterplanning and Development Plan Document (DPD) work is underpinned by Heritage Impact Assessments the NEAs will be proposing further amendments to the Section 1 Local Plan. The NEAs have sought to settle this wording through a Statement of Common Ground but time constraints have precluded its completion. The Statement of Common Ground continues to be progressed, but this note provides an update to the Inspector and affirms the NEAs' desire to ensure the Garden Communities are sensitively integrated into the historic built and natural environment.

Policy Background

Section 1 of the Local Plan provides a framework for future sustainable development. As required by the National Planning Policy Framework, this framework includes 'protecting and enhancing our natural, built and historic environment'. The submitted Section 1 addressed this objective in relation to Garden Communities as follows:

- The Vision for North Essex provides that 'the countryside and heritage assets will be protected and enhanced'.
- Policy SP2 (Spatial Planning for North Essex) states that 'Future growth will be planned to ensure settlements maintain their distinctive character and role'
- Policy SP6 (Place Shaping Principles) includes as its first principle that all new development should 'respond positively to local character and context to preserve and enhance the quality of existing places and their environs', while the third principle is that it should 'protect and enhance assets of historical or natural value'
- Policy SP7 (Development and Delivery of New Garden Communities in North Essex) states that each proposed new Garden Community 'will be an holistically and

comprehensively planned new community with a distinct identity that responds directly to its context’.

Policies SP8-10 (Policies for 3 Garden Communities) each reference the unique qualities that will be conserved and enhanced in Section A – Place-making and design quality. Each policy includes a requirement for protection and/or enhancement of heritage and biodiversity assets within and surrounding the site.

Evidence Base

The policies have been informed by the following Sustainability Appraisal and evidence base work on the historic environment. Work throughout the plan-making process has had regard to NPPF guidance on the historic environment requiring Local Plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, including the historic environment (Paras 158 and 169). Guidance from Historic England contained in The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning:1 provides further guidance on this point, but makes it clear that it does not ‘seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.’ (Para 1)

Sustainability Appraisal/Strategic Environmental Assessment

Work undertaken on the historic environment process has been in accord with Historic Environment Advice Note 8 – Sustainability Appraisal and Strategic Environmental Assessment. Each phase of SA work has followed the advice in its compilation of baseline information on the historic environment; identification of sustainability issues and problems; inclusion of objectives concerning the historic environment in the appraisal framework; and inclusion of criteria relevant to the historic environment in the decision-making criteria.

Objective 9 of the Section 1 SA is ‘To conserve and enhance historic and cultural heritage and assets and townscape character, measured using the following indicators:

Criteria	Potential Indicators
Will it protect and enhance designations, features and areas of historical, archaeological and cultural value in both urban and rural areas?	Percentage of new and converted dwellings on previously developed land Number of listed buildings demolished, repaired or brought back to use, including locally listed buildings New Conservation Area Appraisals adopted
Will it have a negative impact on the significance of a designated historic environment asset or its setting?	Number of Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens (and percentage at risk)
Does it seek to enhance the range and quality of the public realm and open spaces?	Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded
Will it reduce the amount of derelict, degraded and underused land?	

Does it encourage the use of high quality design principles to respect local character?	Number of major development projects that enhance or detract from the significance of heritage assets or historic landscape character
Will / can any perceived adverse impacts be reduced through adequate mitigation?	Percentage of planning applications where archaeological investigations were required prior to approval or mitigation strategies developed or implemented

https://www.braintree.gov.uk/downloads/file/6721/8_sd001_north_essex_authorities_strategic_section_1_local_plans_draft_publication_reg_19_draft_sustainability_appraisal_sa_non-technical_summary

The appraisal of the spatial strategy and potential Garden Community locations accordingly factored in a range of appropriate historic environment considerations. These considerations were also applied in the completion of the Further Sustainability Appraisal work. This work found that ‘all of the spatial strategy alternatives could potentially have a significant negative effect on heritage assets (SA objective 9). For the garden communities the significance of any effects would only be known at the masterplanning phase, which would determine the disposition and extent of development.

As a result, the NEAs consider it appropriate for a Heritage Impact Assessments be prepared to inform Development Plan Documents to ensure they conserve and enhance the wealth of heritage assets in the wider areas of search, avoiding impact in the first instance. Given the size of the areas of search the NEAs consider that impacts can be avoided.

Evidence Base

The NEAs have completed a range of evidence on historic environment issues affecting Garden Communities, which given the strategic level of Section 1, is focused primarily on the identification of assets.

Additionally, Uttlesford has completed a Heritage Impact Assessment for the district which includes references to heritage assets within the West of Braintree Garden Community including Saling Grove, Saling Hall and Great Saling Conservation Area and heritage assets within Braintree District. This work assesses the contribution that the West of Braintree Garden Community area of search makes to the significance of the assets and identifies the impact the allocation might have on that significance. .

CBC/0059 CBC/Colchester/Braintree Borders -Cultural Heritage Audit This Audit assesses the cultural heritage of the Colchester/Braintree Borders site area. It concluded that there was no overriding reason, in terms of the historic environment, to why this area should not be allocated.

https://www.braintree.gov.uk/downloads/file/7184/cbc005912_land_to_west_of_colchester_cultural_heritage_audit

CBC/0058 Tendring/Colchester Borders – Cultural Heritage Audit. This Audit assesses the cultural heritage potential of the Tendring Colchester Borders site area. It concluded that there was no overriding reason, in terms of the historic environment, to why this area should not be allocated.

https://www.braintree.gov.uk/downloads/file/7182/cbc005812_land_to_east_of_colchester_cultural_heritage_audit

Braintree has completed a Historic Characterisation Study providing an inventory of historic assets.

https://www.braintree.gov.uk/downloads/file/4817/historic_characterisation_study_2010

Heritage Assets Impact Assessment for Potential Growth Locations within Braintree District (May 2016) – (Includes references to West of Braintree and Colchester Braintree Borders)

https://www.braintree.gov.uk/downloads/file/5779/heritage_assets_impact_assessment

Uttlesford District Council Heritage Impact work.

<https://www.uttlesford.gov.uk/article/6020/HEN-Historic-Environment> - see document 1001.1

https://www.uttlesford.gov.uk/media/9906/ED64-Stage-1-Hearings-Week-2-Action-AA-2-8-West-of-Braintree-Map/pdf/ED64_Action_AA_2_8_WEST_OF_BRAINTREE_MAP.pdf?m=637045958841670000

– for map of area

NEA Discussions with Historic England

Historic England (HE) has been consulted at all stages of Local Plan development by each of the three North Essex local authorities, and HE has submitted responses at each stage. The NEAs worked on completing a Statement of Common Ground with HE prior to the 2017 Examination hearings, but did not resolve outstanding issues in time to meet SoCG submission deadlines. HE welcomed changes proposed by the NEAs in the draft version of the SoCG to strengthen coverage of historic environment issues within Section 1, but felt that the plan did not provide enough consideration of the historic environment during the broad site selection process. This point was subsequently made in HE's Hearing Statement for the 2017 Examination. https://www.braintree.gov.uk/downloads/file/7275/historic_england

It is noted that the Inspector did not make any specific comments in his letter of 8th June 2018 regarding the historic environment. The NEAs did however carry out further work related to historic environment issues as part of the Additional Sustainability Appraisal work as noted above.

The NEAs incorporated many of the wording changes previously discussed with HE in 2017 (as part of the draft versions of a SoCG) in the Proposed Amendments which were part of the Technical Consultation carried out from 19 August -30 September 2019.

HE responded to the consultation ([SA191](#)) and, while supporting many of the wording changes, raised a number of issues including the extent and timing of Heritage Impact Assessment work. As part of the Statement of Common Ground the NEAs and Historic England are discussing policy amendments to address these concerns. The amendments include a policy commitment to undertake a Heritage Impact Assessment to inform the preparation of the DPD.