

## Comment

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<b>Comment by</b>	Historic England (Mr Tom Gilbert-Wooldridge - 902271)
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**Do you support the approach taken? (please select one)**

**Please state your reasons for supporting or objecting:**

This site abuts the northern boundary of Tewin (grade II Registered Park and Garden) and the topography of the area would result in development of this site having an adverse impact to the setting of the Registered Park and Garden.

(The above is an extract from a letter covering a number of matters. The full letter can be viewed at lpc1453)

**Does a change need to be made? (please select one)**

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**



## ENGLISH HERITAGE

### EAST OF ENGLAND

Colin Haigh  
Head of Planning  
Welwyn Hatfield Borough Council

Our ref: HD/P 5260  
Your ref:

Telephone 01223 582775

By email only

18 March 2015

Dear Mr Haigh

### **Welwyn Hatfield Local Plan Consultation (including Sustainability Appraisal Report and Infrastructure Delivery Plan)**

Thank you for your email dated 22 January consulting English Heritage on the above document. We would like to make the following comments:

#### **Section 2: The Emerging Core Strategy**

We note paragraph 2.4 which states that apart from Policies CS2, CS3, CS4 and CS19, the Council intends to carry forward the remaining strategic policies from the 2012 Core Strategy consultation into the final version of the Local Plan. Our response to the Core Strategy consultation requested changes to a number of policies, and it is not clear whether these have been addressed (other than under the category of “minor changes to improve wording”). Clarification would be welcomed.

#### **Section 3: Policy CS2 – Meeting the Needs for Growth**

##### **Housing**

The consultation document suggests an increase in annual housing delivery for the Borough, as well as the need to provide for a specific number of gypsy and traveller pitches and care home bed-spaces. We do not have a view on exact figures, but it will require a careful and detailed analysis of locations to ensure that distribution of all housing is appropriate. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets. We hope that through the Strategic Housing Land Availability Assessment (SHLAA) and Sustainability Appraisal (SA) that heritage impacts are properly considered when assessing sites.

##### **Employment**

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Any proposed change of use for existing designated employment areas should take into account potential impacts on the historic environment. These impacts could be positive and/or negative depending on the location and significance of any affected heritage asset.

### **Section 5: Policy CS4 – Green Belt**

We note the discussion regarding green belt boundaries and safeguarded land in paragraphs 5.1 to 5.13. Although a separate planning issue in its own right, green belt is relevant to the historic environment, as it can help to conserve the significance of heritage assets through the control of development within their setting. The redrawing of green belt boundaries and safeguarded land will need to consider the impact on the historic environment.

In terms of larger strategic housing sites released from the Green Belt, we consider that large areas of open space that form part of the overall masterplan should remain in the Green Belt, as it provides greater clarity over the function and appearance of land (see paragraph 81 of the NPPF). It is an approach that has been followed in other locations such as larger housing sites on the edge of Cambridge. In the case of Panshanger Aerodrome for example, this approach would help to provide a clearly defined buffer for heritage assets, particularly the registered park and garden of Panshanger.

### **Section 7: Policy CS19 – Strategic Green Infrastructure**

We note the intention for a new policy on strategic green infrastructure. This policy should address historic environment issues relating to green infrastructure. Heritage assets can benefit from green infrastructure proposals and can be green infrastructure assets in themselves (e.g. archaeological sites, historic parks and gardens and open spaces within conservation areas and the grounds of listed buildings). The indicative links shown in Figure 2 connect heritage assets such as Hatfield Park and Panshanger Park.

### **Section 8: Spatial Policies**

We note the intention to review amendments to the visions and objectives for Welwyn Garden City and Hatfield based on consultation responses. We hope that our comments on the previous consultation will be taken into account in any review.

We also note the intention to continue to include site specific policies for strategic locations of approximately 500 or more dwellings. While larger sites tend to require the greatest level of detail, this does not mean that smaller sites should be excluded from site specific policies. They often have specific issues that need to be addressed, including heritage assets. Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development

(addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306).

## **Section 9: Approach to Site Selection**

We have provided separate overarching comments on site selection in response to the Sustainability Appraisal Report (Appendix 2). We hope that the selection of housing, employment and retail sites has properly considered historic environment impacts.

Clarification is needed for the terms “more favourable”, “finely balanced” and “less favourable” housing sites, in order to better understand the reasons why a particular site is classified in a particular way.

We note the intention to designate wildlife sites within the Local Plan, but there is no reference to historic environment designations. There are designated heritage assets, including conservation areas, but also non-designated heritage assets (such as local historic parks and gardens). Other Hertfordshire districts/boroughs identify areas of archaeological importance based on information from the county council’s archaeology team including the Historic Environment Record. We require clarification on historic environment designations, including archaeology.

## **Section 10: Welwyn Garden City**

### **Within existing settlement boundaries**

Sites Hal02, Hal03, Pea08, Pea24, Pea94, Hol19 and Hol100, Pan01 and Pan02

English Heritage is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on these sites.

Sites Han15 and Han40

These sites are both within the existing Welwyn Garden City conservation area but appropriately scaled and well-designed developments on both these sites would be capable of meeting the requirement to preserve or enhance the character or appearance of the conservation area. We have commented separately on a draft Supplementary Planning Document for the Town Centre North site and note the intention to roll forward and update Policy TCR4 of the 2005 District Plan.

Site Pea02 (Broadwater Road West)

The mixed use (employment/residential) site Pea02 is immediately adjacent to the Welwyn Garden City conservation area and contains the grade II listed former Shredded Wheat factory. There is a further grade II modern movement listed building immediately to the south of this site. English Heritage is keen to see the most significant elements of the former Shredded Wheat factory retained and brought back into suitable use that would then ensure the future of this important listed building complex, and we have provided detail guidance on both pre-application proposals for the listed

building and the redevelopment of the brown field site to the south. We have no objection to the principle of redevelopment of this site for mixed employment and residential use, but it will be important to ensure that most significant elements of the listed factory are retained (including the 'heroic' scaled silos), while the scale form massing and disposition of new buildings will require careful consideration to avoid harm to nearby designated heritage assets (including long views from the grade I listed Hatfield House). The SA identifies potential significant negative effects on the historic environment, which will need to be addressed and mitigated.

### **Land outside the urban area**

#### **Sites WC1 and How24**

Development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets. We note that site How24 is in relatively close proximity to the Beehive Lane Conservation Area, but the site is buffered by intervening buildings and, since this is redevelopment of an existing site, it is unlikely to result in harm to the character or appearance of the conservation area. However, the southern edge of both these sites would form the new boundary of Welwyn Garden City with the Green Belt and careful consideration would need to be given to this edge condition as part of any development proposals.

#### **Site WGC4 (including Gypsy and Traveller Allocation GTLAA06)**

This site incorporates part of a WWII airfield that originally served as a decoy airfield and factory site representing the de Havilland factory at Hatfield, and was subsequently used as a training airfield. Last year English Heritage was asked to consider two of the surviving airfield structures for inclusion on the national list and conclude that they did not meet the criteria for inclusion. However, these and a number of other surviving structures on the site may be of local significance. The LPA will therefore need to assess the value and local significance of these structures to determine whether some or all should be retained. We note that the site has already been considered for designation as a conservation area, and that the LPA concluded it did not meet the criteria of special architectural or historic interest as set out in paragraph 127 of the NPPF. In the event that this site comes forward for redevelopment, we note that the eastern end of the site is in close proximity to, and visible from the Grade II\* Registered Park and Garden of Panshanger. Careful consideration would need to be given to the scale of buildings and boundary treatment in this area, together with the siting of houses in relation to the northwest edge of the airfield's plateau and views up from the River Mimram valley. The SA identifies potential significant negative effects on the historic environment, which will need to be addressed and mitigated (there is an error in the mitigation column on page 181).

The 2012 Core Strategy consultation contained a specific policy for this site (Policy CS15), which we provided comments on. It is not clear whether this policy will be updated for the next stage of the Local Plan, but it will need to contain adequate references to the historic environment and landscape. The same applies to the proposed masterplan.

There are strategic cross-boundary development issues in this location given the proximity of East Hertfordshire. With an important heritage asset in the form of Panshanger registered park and garden affected by these cross-boundary issues, we would expect English Heritage (Historic England from 1<sup>st</sup> April 2015) to be actively involved in ongoing and constructive duty to cooperate discussions (please also see our comments relating to Land in East Hertfordshire). We look forward to such discussions in the near future.

#### Site WGC5

This is potentially a large allocation for approximately 700 dwellings. We note there is a grade II listed farmhouse that dates from the late 16<sup>th</sup> or early 17<sup>th</sup> century (Holwellhyde Farmhouse) immediately adjacent to the northeast boundary of the allocation and development of this site could result in the urbanisation of the setting of this farmhouse, divorcing it from open agricultural land which currently is an intrinsic part of its setting. English Heritage recommends that should this site be brought forward for development, consideration is given as to how the setting of Holwellhyde Farmhouse might be protected, either through a revision to the boundary in the immediate vicinity of the farmhouse, or through a requirement for public open space to be used to form a buffer between the farmhouse and the new housing. Heritage issues should be covered in the policy and masterplan. The SA fails to identify the proximity of this listed building, which means it under-estimates the potential effects.

#### Land in East Herts

We note the depiction of a site in Figure 5 described as “Land Promoted in East Hertfordshire”. The site boundary is more precise than the broad location depicted in the East Hertfordshire District Plan Preferred Options consultation in 2014. In our response to this consultation last year, we highlighted the number of proposals in the vicinity of Panshanger registered park and garden, including Panshanger Aerodrome and land promoted by Lafarge Tarmac.

We consider that it is essential that no future iterations of the Local Plans for both Welwyn Hatfield and East Herts be taken forward until the evidence base to assess the sensitivity of this area for development has been fully considered. We therefore request the preparation of a study defining the significance of Panshanger and how this significance is experienced both inside and outside the park, to determine the sensitivity and capacity of this area for development. The study should be carried out with the co operation of the two local authorities, the relevant landowners and English Heritage, and should help to inform the content of the Local Plans and any subsequent masterplanning work.

It is worth noting that one of the Panshanger Aerodrome buildings put forward for listing by the Borough Council is at the westernmost point of the Land Promoted in East Hertfordshire site, on the edge of Blackthorn and Rolls Woods. The decoy site control room was turned down for listing, but retains some interest in terms of its associations with the wartime aerodrome. We would expect its significance to be properly understood and addressed by any development proposals.

## **Retail**

We provided comments on Policy CS14 relating to Welwyn Garden City Town Centre, requesting improvements to its wording. It is not clear whether there have been any changes to this policy since the 2012 consultation, but we hope that references to the historic environment are enhanced.

## **Section 11: Hatfield**

### **Within existing settlement boundaries**

Sites HE23, HS12, HS31 and HS32

English Heritage is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on them.

#### Site HE09

This site is in a sensitive location within the Old Hatfield conservation area, but we note it already has planning permission for residential development. If the quality of development is similar to that of the recently constructed housing development to the north of this site, then there is the potential to enhance the character and appearance of the conservation area.

#### Mixed Use (Retail Residential) Sites HC100b and HW100

Both these sites are for redevelopment of areas first developed in the post-war period. Site HW100 has the grade II listed Church of St John the Evangelist (1958-60) immediately adjacent, but this church was specifically designed for an urban context and appropriately designed redevelopment of the site would not result in harm to its setting. Site HC100b is visible from Hatfield House and the scale of any new development would need to be carefully considered. Over-tall development could adversely impact on the setting of Hatfield House (grade I listed).

### **Outside existing settlement boundaries**

Sites Hat1 and Hat2

These are large allocations (for 1350 and 1100 houses respectively) but there are only two designated heritage assets in close proximity. Both are grade II listed; Old Cottage which lies immediately to the east of site Hat1, and Astwick Manor which is west of site Hat2. Both these designated assets would retain a degree of open land adjacent to them, though in the case of Old Cottage should the *Finely Balanced* North-eastern part of Site Hat1 also proceed, then there is a greater likelihood that its setting would be harmed. English Heritage is content for the LPA to assess the potential impact of development on both these heritage assets and to put in place appropriate measures to protect their settings. The masterplan for both sites should address heritage issues, including the above listed buildings. It is not clear why the SA of each site shows different effects on the historic environment, when the heritage issues are similar for each.

### **Urban Open Land**

We note the proposed designation of urban open land along Mosquito Way on the former Hatfield aerodrome site (UOL218). This forms a key part of the approach past the Grade II\* listed hanger, offices, fire station and control

tower, so we welcome efforts to safeguard the setting and significance of this important heritage assets.

### **Section 12: Woolmer Green**

Site WGr1

This site has a grade II listed farmhouse (Payne's Farmhouse) immediately to the east, but it should be possible to develop this site without causing unacceptable harm to the significance of the farmhouse. To the west and northwest of the site are two employment sites, neither of which would adversely impact on any designated heritage assets

### **Section 13: Oaklands and Mardley Heath**

Site WE01, WN11, OMH5, OMH8 and GTLAA04 (Gypsy and Traveller Allocation)

None of these sites would adversely impact on any designated heritage assets and therefore English Heritage does not wish to comment in detail on them.

### **Section 14: Welwyn**

Wel3, Wel4 and Wel11

None of these sites would adversely impact on any designated heritage assets and therefore English Heritage does not wish to comment in detail on them.

### **Section 16: Welham Green**

Sites WeG3 and WeG10

Site WeG3 is in relatively close proximity to the grade II listed Hope and Anchor public house, but it should be possible to bring this site forward for development without adversely impacting on the setting of the listed building. Site WeG10 is not in close proximity to any designated heritage assets. English Heritage is therefore satisfied that development/redevelopment of these two sites for residential use could be undertaken without adversely impact on the historic environment and we do not wish to comment in detail.

Site WeG6

This site has been identified for up to 70 dwellings. We note there is a grade II listed farmhouse and grade II listed granary (Skimpans Farm) immediately adjacent to the northern boundary of the allocation and development of this site could effectively encircle these listed buildings on three sides, resulting in the potential to urbanise their setting and divorcing them from open agricultural land which currently is an intrinsic part of their setting. English Heritage recommends that should this site be brought forward for development, consideration is given as to how the setting of Skimpans Farm might be protected, either through a revision to the boundary in the immediate vicinity of the farmhouse, or through requiring public open space to be used to form a buffer between the farm and the new housing. This may have implications for the capacity of this site.

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GTLAA01, GTLAA02 and GTLAA03 together with Mixed Use Finely Balanced Sited (employment/residential) WeG4b

In spite of its current partly scruffy appearance, the strip of land between the southwest boundary of Hatfield House (grade I registered park and garden) and the railway currently buffers the park from Welham Green. Enhancement of the landscape quality of this land would also enhance the significance and setting of the grade I Registered Park and Garden. English Heritage recommends that further development is not brought forward for this area.

There appears to be inconsistencies in the SA of each site, with GTLAA01 and 02 assessed as potentially significant negative effect on the historic environment, while GTLAA03 and WeG4b are assessed as minor negative. We would argue that WeG4b could potentially have a significant negative effect on the registered park and garden of Hatfield House notwithstanding the existing A1000.

### **Section 17: Brookmans Park**

Sites BrP14 and BPLH44

English Heritage is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on them.

### **Section 18: Little Heath**

Site BPLH30

English Heritage has no objection to this site coming forward for 5 dwellings, but it should be noted that there is a grade II listed *London Coal Duty Marker* in front of No 57 Heath Road.

Site BrP7

The proximity of Gobions (Grade II Registered Park and Garden) and the Grade II\* listed Folly Arch is an issue that needs to be addressed, but it may be possible for some development to come forward without causing unacceptable harm to these designated heritage assets. There should be a requirement for careful consideration to be given to views to/from Gobions and the Folly Arch, including retaining and reinforcing the existing hedgerow and trees along the north-western boundary.

Site LHe1

This site is opposite the grade II listed Osbourne House (a nineteenth century villa) and the construction of 35 dwellings could have implications for the setting of the listed building. However if the existing hedgerow is retained and reinforced as appropriate, it should be possible for this site to come forward without resulting in harm.

### **Section 19: Cuffley**

Sites Cuf1, Cuf6 and No02

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English Heritage is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on them.

## **Section 20: Major Developed Sites (MDS)**

### **Royal Veterinary College**

English Heritage is satisfied that the proposed changes to the MDS boundary would not result in harm to any designated heritage assets and therefore we do not wish to comment in detail on the boundary changes.

## **Section 21: Cemeteries**

### **CEM01 and CEM02**

Site CEM02 is in close proximity to the Grade II Registered Park and Garden of Bocket Hall and the Grade II listed Crooked Chimney Public House. It is just to the east of the principal avenue that runs south-west to north-east up to the Grade I listed Bocket Hall, while the Grade II\* listed Paine Bridge can be viewed from the B653 road between the site and the park. Subject to suitable boundary treatment (especially to the north and west boundaries), location of access/parking and the landscaped design within the cemetery (including provision for woodland burial etc) it should be possible to develop a cemetery on this site without resulting in harm to the setting of the nearby designated heritage assets. We would wish to advise further on specific proposals, and would expect the next version of the Local Plan to contain explicit requirements for this site allocation in relation to the historic environment.

Site CEM01 will not have a significant impact on any designated heritage assets

## **Section 22: Development Management Policies**

### **Proposed Development Management Policies**

We welcome the proposed inclusion of a development management policy on heritage assets (SADM7), which should build on and supplement strategic policies including Policy CS11 (Protection of Critical Assets) and the spatial policies. Policy CS11 provides an overarching approach to the historic environment and heritage assets, but given it covers a range of environmental topics, it does not have much detail (our response to the 2012 consultation sought a change to the wording of this policy). The spatial policies contain further detail, but they are site or place specific, meaning that there is still the need for a more detailed policy on the historic environment and heritage assets. This would help to address Paragraph 126 of the NPPF which requires Local Plans to contain a positive strategy for the historic environment.

In terms of the content of a development management policy, we would expect it to address both designated and non-designated heritage assets including archaeology and assets of local interest (we would encourage the production of a local list). It should make clear the process in which planning applications affecting heritage assets will be assessed, including the provision

of sufficient information and justification for development. There should be clarity regarding archaeological expectations.

The policy should pursue enhancement opportunities, including public realm improvements and the positive removal of heritage assets from the Heritage at Risk Register. The policy should also set out how conservation areas will be managed, to include appraisals, management plans and potential Article 4 Directions. Climate change matters, as they affect heritage assets, should also be addressed through development management policies. Overall, there should be a policy approach that is locally specific and reflects elements of importance to Welwyn Hatfield, while ensuring consistency with national policy and guidance.

We hope the above suggestions are helpful. We would be happy to comment on a draft policy before the next consultation stage.

### **Saved Policies**

We note the intention to replace remaining saved District Plan policies on the historic environment (R24, R27, R28 and R29) with Policy CS11 and SADM7. We are comfortable with this approach, assuming that the new Local Plan policies provide adequate coverage of historic environment issues.

### **Appendix A: Finely Balanced Housing Sites**

#### **Welwyn Garden City**

Southern Part of Site WGC5

English Heritage does not wish to pass further comments on this site in addition to our comments on the part of the site identified as *Most Favourable*.

#### **Hatfield**

North-eastern Part of Hat1

English Heritage does not wish to pass further comments on this site in addition to our comments on the part of the site identified as *Most Favourable*.

Southern Part of Hat2

English Heritage does not wish to pass further comments on this site in addition to our comments on the part of the site identified as *Most Favourable*.

Site Hat4

This site lies alongside Wilkins Green Lane, a narrow county lane enclosed by mature hedgerows on both sides. On the north side of the lane is Torilla, a grade II\* modern movement house dating from 1934/5 (designed by FRS Yorke). To the west of Torilla is the grade II listed 17<sup>th</sup> century manor house of Great Nast Hyde and the grade II listed Nast Hyde farm. Development of Site Hat4 would adversely impact on the quality of the lane and the setting of the grade II\* house Torilla. It would also have the potential to harm the setting of the other nearby grade II listed buildings. Given the national significance of Torilla and other listed buildings, English Heritage recommends that this site is not brought forward for development, and is downgraded from 'Finely Balanced' status. The SA correctly identifies the potential for significant negative harm to the historic environment.

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## Site Hat5

Development of this site is less likely to impact on the setting of the grade II\* house Torilla, but it may still have implications for the character and appearance of Wilkins Green Lane. English Heritage agrees with it being identified as a finely balanced site.

## Welwyn

Wel1 and Wel2

English Heritage notes the comments placed against these two sites, and would ask that consideration of these sites should also take into account the potential adverse impact on views out from the nearby Welwyn Conservation Area.

## Welham Green

WeG4a Marshmoor

As noted separately in respect of sites GTLAA01, GTLAA02, GTLAA03 and WeG4b, in spite of its current partly scruffy appearance, the strip of land between the southwest boundary of Hatfield Park (grade I registered park and garden) and the railway currently buffers the park from Welham Green. Enhancement of the landscape quality of this land would also enhance the setting of the grade I registered park and garden and English Heritage recommends that further development is not brought forward in this area. The SA underestimates the historic environment impact, rating it only as minor negative. We would argue that WeG4a could potentially have a significant negative effect on the registered park and garden of Hatfield House notwithstanding the existing A1000.

## Brookmans Park

Sites BrP1, BrP4 BrP6 and BrP12

These sites are unlikely to have an adverse impact on any designated heritage assets and we therefore do not wish to comment in detail on them.

## **Appendix B: Less Favourable Sites**

### Welwyn Garden City

WCG3 and WGC6

Residential development on these sites is unlikely to have an adverse impact on any designated heritage assets and we therefore do not wish to comment in detail on them.

### Hatfield

Hat3 and Hat12

There are a number of designated heritage assets in the vicinity of these two sites, including Torilla (a grade II\* modern movement house), Great Nast Hyde (a grade II 17<sup>th</sup> century manor house), Nast Hyde farmhouse and barns (grade II listed) and the granary, barn and farmhouse at Popefield farm (all grade II listed). Site Hat12 would be particularly harmful to the historic environment, and English Heritage recommends that neither of these sites is brought forward. The SA correctly identifies the potential for significant

negative harm to the historic environment from both sites, although incorrectly states that there are no heritage assets adjacent to Site Hat12.

Furthermore, from a brief site visit and in light of the number of designated heritage assets in this area, English Heritage recommends that consideration is given to the possible designation of a small conservation area in this locality, designated jointly with St Albans City and District Council.

#### Hat11

Low rise residential development on this site is unlikely to have an adverse impact on any designated heritage assets (including longer views out from Hatfield House and the Grade I Registered Park and Garden) and we therefore do not wish to comment in detail on this site.

#### **Woolmer Green**

WGr3, WGr4 and WGr5

Residential development on these sites is unlikely to have an adverse impact on any designated heritage assets and we therefore do not wish to comment in detail on them.

#### **Oaklands and Mardley Heath**

OMH7

Residential development on this site is unlikely to have an adverse impact on any designated heritage assets and we therefore do not wish to comment in detail on this site.

#### **Digswell**

Dig1

This site abuts the northern boundary of Tewin (grade II Registered Park and Garden) and the topography of the area would result in development of this site having an adverse impact to the setting of the Registered Park and Garden.

Dig4

This site is within the setting of the monumental grade II\* listed railway viaduct and development in this location would erode the dramatic landscape setting of the viaduct, resulting in harm to its significance. English Heritage therefore recommends that this site is not brought forward for development.

#### **Brookmans Park**

BrP2 and BrP13

Residential development on these sites is unlikely to have an adverse impact any designated heritage assets and we therefore do not wish to comment in detail on them.

BRP9 and BrP10

These two sites adjoin Gobions (grade II Registered Park and Garden) and housing development in this location is likely result in harm to the setting of the Registered Park and Garden. We therefore recommend that these sites are not brought forward.

## **Cuffley**

Cuf4, Cuf5 and Cuf7

Residential development on these sites is unlikely to have an adverse impact on any designated heritage assets and we therefore do not wish to comment in detail on them.

## **Appendix C: Sites that failed the first SHLAA test**

We have not considered any of the failed sites in Appendix C, but hope that historic environment impacts have been taken into account where relevant. We note that Site BrP8 was rejected due to its location within the Grade II registered park and garden of Gobions.

## **Sustainability Appraisal**

We have commented on the SA in relation to a number of site specific comments, but we would like to make the following overarching comments:

### **SA Framework**

It is not immediately clear how housing, employment and other site allocations have been identified and appraised against potential historic environment impacts. The SHLAA methodology is not explicit and the 2014 Economy Study does not mention the historic environment in the site suitability section. The SA Framework (Appendix 2) sets out assumptions for the sustainability appraisal of housing and employment sites against SA objective 4.5 on the historic environment. This follows a proximity based approach to the historic environment, with the overall assumption that negative effects are likely to occur when sites are nearer to heritage assets. We note that this assumption is caveated with some uncertainty depending on exact details of proposals.

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 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 alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

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## **Infrastructure Delivery Plan**

We have not been able to consider this document in any detail, but hope that issues and opportunities relating to the historic environment have been taken into account.

I hope the above comments are useful. If you would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely



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