



Historic England

Planning Policy Team
Civic Offices
323 High Street
Epping
Essex
CM16 4BZ

Our ref: PL00045894

Telephone: [REDACTED]

29 January 2018

Dear Sir/Madam,

Re. Epping Forest District Council Reg. 19 Submission Version Local Plan Jan 2018

Thank you for consulting Historic England on Epping Forest District Council's draft Local Plan (regulation 19). 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. Therefore we welcome the opportunity to comment on the submission version. We have now had the opportunity to review the documents and can provide the following substantive comments. The following comments should be read in conjunction with our previous representations dated 12th December 2016.

Chapter 1: Introduction

We recommend that the wording within the bullet point of paragraph 1.44, referring to "*historical artefacts and buildings*" on page 10, is amended to refer to the "*historic environment*". This will better reflect national policy and improves the soundness of the Plan.

Chapter 2: Strategic Policies

We welcome the recognition of Historic England as a duty to cooperate partner in paragraph 2.4.



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We welcome point A(i) in the Vision for the London Stansted Cambridge Corridor Core Area which seeks to maintain and enhance the special character of the area. It is advised that this is slightly altered to state maintain or enhance the special character of the area. Whilst we welcome recognition of character as a contributor to creation of locally distinct places, the Vision should be strengthened however to better emphasise the aspiration of conserving or enhancing the historic environment. We also request that point A(iv) is amended to include reference to the "... *high quality built, natural and historic environment, unique landscapes ...*".

Vision:

We welcome the reference to the conservation and enhancement of Epping Forest at paragraph 2.26 and at point A(v) in the Vision for Epping Forest District. However, this section should be strengthened to better articulate that the conservation includes the historic as well as the natural environment. Epping Forest contains some important archaeology for example and the presence of these types of heritage assets does not come through in the Vision.

The Vision should be locally specific to Epping Forest District. It should reference the types of heritage assets which make up the stock of designated and non-designated assets within the Joint District area. It would be helpful to describe the types and nature of settlements which characterise the area. The Vision should recognise the irreplaceable nature of the historic environment and heritage assets. The need to conserve or enhance the historic environment should be referred to explicitly.

Point A(v) refers only to Epping Forest. We therefore request that an additional bullet point is added to include reference to the historic environment which reads "*the historic environment will be conserved and enhanced*". The Plan's strategic policies will derive from the Vision and so there needs to be sufficient aspirations in the Vision for the maintenance and enhancement of the historic environment as a strand in the pursuit of sustainable development as defined by paragraph 14 of the NPPF. This will help ensure that the associated strategic policies incorporate a positive and clear strategy to deliver the conservation and enjoyment of the historic environment (as linked to paragraphs 126 and 157 of the NPPF).

Epping Forest District contains a number of sites which are on the 2017 National Heritage at Risk Register (HAR register). It is therefore advised that the Vision contains reference to the need to address HAR, this could also be a useful monitoring indicator.





Objectives:

We welcome point A(ii) which seeks to preserve and enhance Epping Forest and its setting.

We recommend point A (iv) is amended to replace the term “*heritage resources*” with “*historic environment*” before going on to list types of heritage assets.

We welcome reference to character in point A(v).

Strategic Policies:

Policy SP1: Presumption in Favour of Sustainable Development

We welcome the useful and appropriate reference to the conservation and enhancement of the historic environment within the context of sustainable development at paragraphs 2.36, 2.38 and 2.39 of the supporting text.

Policy SP4: Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town

Paragraph 2.109 of the draft plan sets out that the proposed approach to garden town communities will follow Town and Country Planning Association (TCPA) Garden City Principles. However there is no specific consideration for the historic environment within these principles. We welcome the provision of point C(xvi) of the this policy which seeks to create distinctive environments which relates to the surrounding area, the natural and historic landscapes and systems. Whilst this is welcomed, and it is noted that the protection of the landscape and green spaces should benefit the historic environment as well, this provision is insufficient alone to secure the conservation and enhancement of the historic environment. It is recommended that an additional criterion is added which relates to the historic environment. The policy presently lacks an emphasis on the wider historic environment and does not cover aspects of built heritage, townscape, archaeology or designed landscapes. It is concerning to see a lack of consideration for the historic environment at this strategic level.

In terms of the principle of the site allocations, we advise that Historic Impact Assessments (HIA) be undertaken in accordance with our advice note ‘Site allocations in Local Plans’ for each of the proposed broad locations. This is to determine the appropriateness or otherwise of the locations for development, the extent of the development and therefore potential capacity of the sites, the impacts upon the historic environment (considering each asset and its setting and its

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significance), impacts of development upon the asset and any potential mitigation measures necessary to accompany the proposals. Appropriate criteria for the protection of heritage assets and their settings need to be included in each of the policies and supporting text for the Garden Communities.

Policy SP5: Garden Communities

There are areas where development will be focussed, in particular the Garden Town Communities around Harlow as well as at Epping, Loughton, Waltham Abbey, North Weald Bassett and Ongar. The focus of development in these areas will have impacts on the local character and historic environment surrounding the settlements through the loss of greenfield and agricultural land. The Sustainability Appraisal (SA) states that ultimately the nature and significance of effects are uncertain at this stage as they will be dependent on the precise design and layout of development as well as mitigation measures delivered. There may be opportunities to enhance the historic environment, particularly through the regeneration of brownfield land within settlements; however, this is uncertain at this stage. On balance the SA finds that the draft Plan will have uncertain minor negative impacts upon the historic environment, particularly in light of the findings of the landscape appraisal.

Harm may be mitigated through site specific policies and the detailed design of proposed allocations for these large scale developments but in order to do this successfully it is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that Heritage Impact Assessments (HIA) are carried out in order to support the allocation and to allow the significance of the historic environment to be better understood. These HIAs should then inform any master plan process. The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

Site SP 5.1: Latton Priory

This is a large site allocated for 1,050 homes. We raised a number of issues with the policy proposal for this site and it is disappointing to see that our previous comments have not been fully addressed. We previously advised that whilst there are no known designated heritage assets within the site, there are number of assets of note to the south of the site. These include the Grade II listed Latton Farmhouse, Grade II* listed Latton Priory and two scheduled monuments, a moated site south of Dorrington Farm and at Latton Priory. Historic England has also recently grant aided considerable



work at the Priory and is currently undertaking extensive research on the surrounding earthworks with a view to revising the designation of the site. In light of this the policy should refer to the potential of discovery of non-designated heritage assets. Development of the site has the potential to impact upon the setting of these heritage assets and given the high status of the designations Historic England will be a statutory consultee to any subsequent proposals.

Whilst we note point F(vi) which seeks a sympathetic design that responds to the scheduled monument there is no provision to conserve or enhance the scheduled monument and no reference to its setting. The policy is entirely silent on the presence of the listed buildings and potential presence of non-designated heritage assets. We advised previously that these assets should be identified within the policy and supporting text. There should also be a policy criterion which requires a master planning process to take into account the need to protect or enhance these heritage assets and their settings. We also advised that an assessment is made of undiscovered archaeology within the site given its proximity to nationally important monuments.

Site SP 5.2: Water Lane Area

This site is allocated for 2,100 homes. It is difficult to distinguish exactly where the site boundaries lie from the inset maps but it appears that Nazing and South Roydon Conservation Area partially falls within the site, the site also appears to include three Grade II listed buildings namely Brookside Cottage, Oldhouse Farmhouse and its associated barn. The site is surrounded by a number of other designated heritage assets including 11 Grade II listed buildings and 2 scheduled monuments to the north west of the site in the form of Cold War anti-aircraft gun sites. Development of this site has the potential to impact upon the settings of these heritage assets.

In our previous representation we advised that these heritage assets should be identified in the policy and supporting text, we are disappointed to that this has not been done. Any masterplan needs to take into account the need to protect or enhance the conservation area, scheduled monuments and listed building and their settings. The development should be of high quality design. These requirements should be included in the policy and supporting text of the Plan.

Site SP 5.3: East of Harlow

This site is allocated for 750 homes. Again, it is difficult to distinguish exactly where the site boundaries lie from the inset maps but it appears that site contains the Grade II* listed Sheering Hall, and three Grade II listed buildings including x2 barns associated with Sheering Hall and a pump south west of Mayfield Farmhouse.





Gibberd's The House, Marsh Lane is a Grade II Registered Park and Garden (RPAAG) and is located to the west of the site as is the Grade II listed RPAAG of Pishobury. There are also two scheduled monuments, a Roman Villa north east of Harlowbury and Springhall Lane causewayed enclosure, in close proximity to the site. The Grade II* listed Durrington Hall, Alymers, Pishobury Park Mansion, and stable block at Pishobury are also nearby, as are twenty other Grade II listed properties. Development of the site has the potential to impact upon the setting of these heritage assets and given the high status of the designations Historic England will be a statutory consultee to any subsequent proposals.

In our previous representation we advised that these heritage assets should be identified in the policy and supporting text, we are disappointed to that this has not been done. Any masterplan needs to take into account the need to protect and enhance the conservation area, scheduled monuments and listed building and their settings. The development should be of high quality design. These requirements should be included in the policy and supporting text of the Plan.

Chapter 3: Housing, Economic and Transport Policies

Policy E4: The Visitor Economy

We welcome point A(iv) which recognises the importance of conserving and enhancing cultural heritage and the role it plays in the tourist industry.

Policy T1: Sustainable Transport Choices

Historic England supports sustainable transport options, however in order to be sustainable the policy must ensure that subsequent transport schemes consider the historic environment. The policy currently does not take account of how highways design and the historic environment can be successfully incorporated. We would expect to see schemes assess their impacts upon townscape, historic landscape and heritage assets and design accordingly. New roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on landscape and townscape. As such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail. The policy should therefore include a criterion to this effect.



Chapter 4: Development Management

Policy DM3: Landscape Character, Ancient Landscapes and Geodiversity

We welcome a standalone policy which addresses landscape character and historic landscapes. Reference to setting in point A(i) and reference to long views in point A(ii) are particularly helpful.

Policy DM4: Greenbelt

We welcome point A(iv) of this policy which requires development to preserve the setting and special character of historic towns.

Policy DM7: Heritage Assets

We welcome this well written policy and comprehensive supporting text. We would however recommend that the policy is titled *Historic Environment* rather than *Heritage Assets*. It is also advised that the point A should be amended to read “*development proposals should seek to conserve or enhance the character or appearance*” in order to more accurately reflect the relevant statutory obligations. Enhancement is encouraged and this could be emphasised in the supporting text.

We are particularly pleased see appropriate reference to setting and to non-designated heritage assets and those on the local list. The requirement for a heritage statement is outlined in paragraph 4.60 for any applications affecting heritage assets, and the need for an archaeological evaluation is outlined in paragraph 4.63 of the supporting text. This is welcomed but should be reflected in the policy as a criterion as well.

We note and are pleased to see that the Council will undertake periodic reviews of its designated and non-designated heritage assets and introduce additional levels of protection as necessary.

Policy DM8: Heritage at Risk

We very much welcome a standalone policy which addresses heritage at risk.





Policy DM9: High quality design

Historic England welcomes the inclusion of the policy. However, as outlined in our previous representation, we recommend the addition of a bullet point to refer to the need design to respond to and have regard to the historic environment.

Policy DM 12: Subterranean, basement development and lightwells

We welcome a standalone policy on basement development within the draft Plan. These sorts of development can have implications for the historic environment which should be better articulated and considered within the supporting text and the policy.

Whilst we welcome recognition of the historic environment in point A(v) of the policy, it is recommended that this is strengthened within the policy itself and within the supporting text. We also request that the wording is amended to omit "*will not adversely impact ...*" to "*will conserve or enhance ...*". It is also advised that the historic environment is listed alongside natural environments at paragraph 4.83 of the supporting text.

The policy at present displays a lack of consideration of the overall impacts of the basement development upon the historic environment and there is no evidence to demonstrate how the policy criteria have been arrived at or how the policy will be successful in ensuring that the historic environment will be conserved. Greater discussion in the supporting text on the particular risks of basement development upon the historic environment is also recommended. Basement development and subterranean works brings the specific risk of disturbing archaeology. There are also problems when considering subterranean developments within the curtilage of or setting of listed buildings as careful consideration will need to be given to the need to avoid loss of and disturbance to historic fabric, as well as how the basement level will be accessed and arranged. Underpinning of a listed building or structure such as listed garden wall for example, will have significant impacts upon the historic footings and foundations similarly linking the basement to the original property will be problematic. From layout terms, the creation of an additional storey below a property can be as equally harmful to internal plan form, layout, hierarchy and character as adding one above a property. Even smaller works such as a lightwell serving a basement in non-designated heritage asset can emphasise the existence of an additional storey below ground therefore allowing what historically was a two storey building for example to be read as a three storey building. Alterations such as this can have major implications upon the character of an area.

Omitting specific reference to archaeology and other heritage assets from the policy is likely to make it harder for applicants to make successful planning applications and



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for the borough to make informed decisions. It also increases the risk of delays during the planning and building phases of developments if significant archaeology is discovered, which has not been identified at the appropriate stage of the process. We would emphasise the importance of the early assessment of archaeological potential to ensure applicants give this adequate consideration.

I would also query why the supporting text makes reference to permitted development rights for basement extensions when it has not been referred to elsewhere with respect to above ground extensions, changes of use or other works which can be undertaken without the need for planning permission. Including this may create ambiguity and could be misinterpreted by readers. For example, if a basement affecting a designated heritage asset meets permitted development requirements it may still need a different consent such as listed building consent of scheduled monument consent which may not be forthcoming.

There is concern that there is a lack of evidence to support this policy and which demonstrates how the historic environment has been considered when forming the policy. This policy does not appear to be mentioned in the SA either. Point F is noted but the Plan is limited in terms of information to guide prospective applicants and decision makers as to how they are to interpret the policy, specifically regarding to the level of detail required to demonstrate compliance with the policy criterion. For example there is no information that outlines the scope and detail required within any engineering documentation or Basement Impact Assessment, for example is the method of construction to be detailed? This is critical when considering the impacts upon the historic environment as the method of excavation, construction, and piling/underpinning can have considerable repercussions on the structural integrity of above ground structures within or adjacent to the site and below ground archaeology as well as the wider historic environment. Associated activities such as pumping ground water out of a basement dig can impact upon the wider water table resulting in displacement of water or even dewatering which, depending on the underlying geological conditions, can have serious impacts upon foundations. There is no evidence it show how the Council has considered these sorts of issues. It may be that the Council intends to provide a Supplementary Planning Document which contains this information but it is not clear from the draft Plan. If an SPD is being considered it should be referred to in the Plan itself and appear as a monitoring indicator, if not this policy and supporting text for DM12 should be expanded upon.

Policy DM13: Advertisements

We welcome point A(iv) which resists the use of internally illuminated advertisements where harm is caused to heritage assets including listed buildings and conservation areas.

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Policy DM14: Shopfronts and On-Street Dining

The retention of original/historic or significant shopfronts elements are often integral to the character of retail/commercial buildings and that of the wider street scene. We welcome this policy and the specific provision which seeks the retention of traditional shopfronts which contribute to the visual, architectural or historic quality of the local townscape. We are also pleased to see that the policy encourages the conservation of original materials and features. It is however suggested that "historic features" rather than "original features" is used.

Policy DM20: Low Carbon and Renewable Energy

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character or appearance. Special considerations under Part L of the Building Regulations are also given to locally listed buildings, buildings of architectural or historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. It is advised that the supporting text is expanded upon to make reference to these exemptions.

The design and siting of some energy efficiency equipment can have impacts upon the character and appearance of historic places and upon the setting of heritage assets. It is recommended that consideration is given within this policy to the continued need to conserve and enhance the historic environment, and for developments to consider the setting of individual heritage assets.

In developing policy covering this area you may find the Historic England guidance *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.

Policy DM21: Local Environmental Impacts, Pollution and Land Contamination

The comments made in reference to policy DM20 apply here as well. There is also particular concern with point E which relates to sustainable construction and design techniques. Whilst we support these types of modern construction the policy should make a qualification regarding heritage assets. Some heritage assets, such as listed

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buildings, may not be compatible with modern construction techniques and it is not clear how this policy will be applied. For example a new extension to a listed building, if constructed in a modern more sustainable way, may result in the inadvertent degradation of historic fabric elsewhere within the building as it will impact upon the permeability of fabric. It is advised that the policy or supporting clarifies the position regarding heritage assets and sustainable construction techniques.

Local or on-site sourcing of building materials and reuse of materials will be a benefit to the historic environment as well, and there is an opportunity to reflect this within the supporting text of this policy.

Chapter 5: Places

We welcome the development requirements for this site outlined in appendix 6 which address the issues we raised in our previous representation dated 12th December 2016. However, there is considerable concern that this schedule of important and well written development requirements may not get the prominence it needs as an appendix. We recommend that the policies are altered to include the development requirements within the policy itself, the more discursive elements of the text could appear in the supporting text. This will avoid any ambiguity regarding the status of the development requirements and will help readers better understand the Council's expectations for the sites in line with paragraph 154 of the NPPF. If it is not possible for the Council to incorporate the development requirements into the policies at this stage we would recommend that appendix is renamed and placed at the end of the Places chapter within the main body of the Local Plan itself.

As mentioned above, our comments on sites which appeared in previous draft of the Plan have been addressed by the site specific text in Appendix 6. Provided this text is given more prominence in the document and it is clarified that it is part of the policies as recommended we raise no objection to the wording or content in terms of soundness. A number of sites that appeared in earlier versions of the draft Plan have been omitted from the current draft; others have been added or have changed size. In the interests of due process, the following comments therefore refer only to sites which did not previously appear in the earlier version of the Plan, those sites which have been enlarged or reduced since previous versions, and those that we were unable to comment on previously.





Epping

Site EPP.R2: Land south of Epping

This site has been allocated for 500 homes and increased in size to accommodate 500 homes instead of 244 homes as outlined in the previous version of the Plan. The increased size of the site would see the site boundary extended so that it lies much closer to three Grade II listed buildings: Gardeners Farmhouse, the associated barn and Coopersale Hall. We note the policy provision at part K (viii) which requires any strategic master plan for the site to ensure that impacts upon these Grade II listed buildings are minimised. Whilst we welcome this insertion and welcome the identification of the individual heritage assets in the policy wording, the objective could be strengthened so that instead of "minimising the impact" of development, development is instead required to ensure that the heritage assets and their settings are conserved or enhanced. This would align more with the statutory obligations of the relevant legislation.

Site EPP.R4: Land at St Johns Road

This site is allocated for 34 homes and partially falls within the Epping Conservation Area. The site is also in close proximity to the Grade II listed 5, 7, 9, 11 St John's Road and the Grade II* listed Church of St John the Baptist. We welcome the development requirements for this site outlined in appendix 6. We are particularly pleased to see reference to locally listed buildings within the site and the expectation that these will be retained as part of any development of the site. As noted above however, there is concern that this important and well written development requirement may not get the prominence it needs in the appendix.

Loughton

Site LOU.R1: Loughton London Underground Car Park

This site has increased in size from the previous version of the Plan, and is now allocated for 165 homes rather than 114. Whilst there are no heritage assets within the site boundary, the site lies adjacent to Loughton Underground station which is Grade II listed. We welcome the development requirements for this site outlined in appendix 6. We are particularly pleased to see reference to locally listed railway signal box and the expectation that development proposals retain it, we are also pleased to see reference to setting of the listed underground station. As noted above however, there is concern that this important and well written development requirement may not get the prominence it needs in the appendix.





Site LOU.R7: Loughton Library

This site is allocated for 20 homes and is a site that did form part of the previous draft. There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Site LOU.R9: Epping Forest College

This site is smaller in size than shown in previous versions of the Plan and is now allocated for 111 homes rather than 158. Whilst there are no heritage assets within the site boundary there are a number of grade II listed buildings to the west of the site. Any development of the site therefore has the potential to impact upon these heritage assets. We welcome the development requirements for this site outlined in appendix 6. As noted above however, there is concern that this important and well written development requirement may not get the prominence it needs in the appendix.

Site LOU.R12 and LOU.R13: Land 63 Wellfields and 70 Wellfields

These two sites are allocation 10 homes at 63 Wellfields and 6 homes at 70 Wellfields that did form part of the previous draft. There are no known heritage assets within or near to the sites which would be affected by their development. Historic England has no comment to make on this site allocation.

Site LOU.R14: Land at Alderton Hill

This site is allocated for 33 homes did form part of the previous draft Plan. There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Site LOU.R15: Land at Traps Hill

This site is allocated for 6 homes did form part of the previous draft Plan. There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Site LOU.R16: St Thomas More RC Church

This site is allocated for 18 homes did form part of the previous draft Plan. There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Site LOU.R18: Land at High Beech Road

This site is allocated for 8 homes did form part of the previous draft Plan. It is noted that Planning Permission was granted for 8 units in June 2017.



Waltham Abbey

We have no comments to make on sites WAL.T1, WAL.R2, WAL.R1, WAL.R3, WAL.R6, WAL.R7, WAL.E1, WAL.E2, WAL.E6, WAL.E7, WAL.E4, WAL.E5, and WAL.E8. There are no known heritage assets within or near to these sites which would be affected by their development.

Sites WAL.R5 Waltham Abbey Community Centre and WAL.R4 Fire Station at Sewardstone Road

These two sites are adjacent to the Waltham Abbey Conservation Area which contains a number of highly graded designated heritage assets, including the Grade II* Essex House. It should also be noted that the Waltham Abbey Conservation Area is identified as a Conservation Area at Risk on the National Heritage at Risk (HAR) Register. Development of these sites has the potential to impact upon the setting of these heritage assets.

We welcome the development requirements for site WAL.R5 outlined in appendix 6 and recommend that similar provisions are made for site WAL.R4. It is also recommended that the policy and supporting text recognise that the conservation area is on the HAR register.

Site WAL.E3: Land at Woodgreen Road

There are no designated heritage assets within the site but it is located adjacent to the Upshire Conservation Area. We recommend that the development requirements for the site are amended to ensure that development has regard for the setting of the conservation area.

Ongar

Sites ONG.R6 Land between Stanford Rivers Road and Brentwood Road and ONG.R7 Land south of Hunters Chase and West of Brentwood Road

These two sites are new additions that did not appear in the earlier version of the Plan. We welcome the development requirements for these two sites in Appendix 6 which make appropriate provision for the conservation of nearby heritage assets.

Site ONG.R8 The Stag Pub

This site is a new addition that did not appear in the earlier version of the Plan. We welcome the development requirements for the site in Appendix 6 which make appropriate provision for the conservation of nearby heritage assets.



Buckhurst Hill

No additional sites have been added in this area since the previous draft of the Plan. The development requirements in Appendix 6 have made adequate provision for the conservation of designated and non-designated heritage assets. Historic England has no further comments to make on these sites.

North Weald Bassett

We welcome the development requirements for the sites in Appendix 6 which make appropriate provision for the conservation of nearby heritage assets.

With regards to North Weald Bassett Masterplan Area, we advise that the wording of point L(vi) is amended to read, "*development should conserve or enhance the setting of the Grade II listed buildings Bluemans Farm and Tyler's Farmhouse*" rather than reading "*careful design should mitigate ...*". Harm in the first instance should be avoided before mitigation is considered. We also advise that a similar policy criterion is added to North Weald Airfield Masterplan Area policy making similar provision for the conservation and enhancement of the historic environment and for the setting of individual heritage assets.

Chigwell

The development requirements in Appendix 6 have made adequate provision for the conservation of designated and non-designated heritage assets. Historic England has no further comments to make on these sites.

Theydon Bois

We are pleased to see that the development requirements in Appendix 6 reflect our previous comments in relation to site THYB.R2.

Two additional sites appear in this draft of the Plan:

Site THYB.R1: Land at Forest Drive

There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.



Site THYB.R3: Land at Coppice Row

This site is allocated for 6 homes. Whilst there are no designated heritage assets within the site, it is located adjacent to the Grade II listed Baldocks. Any development of this site will need to protect and enhance the listed buildings and their settings. The development should be of high quality design. We recommend that these requirements should be included in the policy and supporting text of the Plan.

Roydon

We are pleased to see that the development requirements in Appendix 6 reflect our previous comments in relation to site ROYD.R1.

Site ROYD.R4 Land at Parklands Nursery

There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Nazeing

South Nazeing Concept Framework Plan (sites NAZE.R1, R3 and R.4)

We welcome the reference to the Grade II listed Cutlands in the development requirements and the reference to its setting.

Sites NAZE.E6 and NAZE.E7 Millbrook Business Park and Land at Winston Farm

Whilst there are no designated heritage assets within the site is located adjacent to the Nazeing and South Roydon Conservation Area which contains a number of listed buildings, including the Grade II* listed Greenleaves and its associated barn which lie in close proximity to the west of the site, as well as a Grade II listed barn at Greenleaves. It should also be noted that the Nazeing and South Roydon Conservation Area is identified as a Conservation Area at Risk on the National Heritage at Risk (HAR) Register. Any development of this site will need to protect and enhance the listed buildings and their settings. The development should be of high quality design. We recommend that these requirements should be included in the policy and supporting text of the Plan. It is also recommended that the policy and supporting text recognise that the conservation area is on the HAR register.



Site NAZE.E5 Birchwood Industrial Estate

There are no known heritage assets within or near to the site which would be affected by its development. Historic England has no comment to make on this site allocation.

Lower Sheering

Site LSHR.E1: Land at The Maltings

The site falls within the Lower Sheering Conservation Area which is identified as a Conservation Area at Risk on the National Heritage at Risk (HAR) Register. The conservation area contains two Grade II listed buildings associated with The Maltings (north and south block to west of railway). The north and south blocks of the Maltings to the east of railway and adjacent to the site boundary are also Grade II listed.

Any development of this site will need to protect and enhance these heritage assets and their settings. All the buildings forming the Maltings have group value and are part of an extensive mid-late C19 Maltings. We recommend that the policy is amended to identify these heritage assets and that a policy provision is included which conserves or enhances their significance and the setting of these individual heritage assets. It will be important to also ensure that the policy makes reference to the group value of the buildings and this should inform subsequent development. The impacts upon setting should be assessed within the context of this group value as well. It is also recommended that the policy and supporting text recognise that the conservation area is on the HAR register.

At present neither the policy, supporting text or development requirements refer to the onsite and neighbouring heritage assets. We request that the policy is Plan is amended accordingly.

Site LSHR.R1: Land at Lower Sheering

There are no designated heritage assets within the site boundary but it is located adjacent to the Lower Sheering Conservation Area and to the south of the Grade II* Listed Lodges at the south entrance to the Park of Great Hyde Hall. The site lies to the immediate south of the Lodges in an area of undeveloped land. The listed properties form part of an important neo-classical group, and as gatehouses their setting is an important aspect of their significance. There is concern that the development of this site would adversely impact upon the setting of this group of listed buildings and therefore their significance. It is noted that the existing triangle of land directly opposite the buildings contains trees and shrubs which provide a degree of screening, but given the seasonal nature of the vegetation they cannot be relied



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upon to provide adequate mitigation. Although small, entrance lodges such as these were often designed to a high architectural standard in order to anticipate the architectural achievement of the main house. It is therefore important that any new development to the south of these lodges does not visually compete with them in terms of scale and proximity. The development requirements reference the conservation area but do not identify the Grade II* listed lodges. We request that the policy and supporting text is amended to identify the lodges and that a policy criterion is added to ensure that development conserves or enhances the setting of these important buildings.

As above, it is also recommended that the policy and supporting text recognise that the Lower Sheering Conservation Area is on the HAR register.

Moreton

Site MORE.T1 Land at Lakeview

This site lies to the north of the Moreton Conservation Area which contains a number of Grade II listed properties. We welcome the development requirements outlined in Appendix 6 which make appropriate provision for the conservation of nearby heritage assets.

Sheering

We welcome the development requirements for the sites in Appendix 6 which make appropriate provision for the conservation of nearby heritage assets.

Stapleford Abbots

There are no known heritage assets within or near to the sites which would be affected by their development. Historic England has no further comment to make on these site allocations.

Rural Sites

Unfortunately we have not had the capacity to comment on sites. However, we suggest that you follow the approach outlined above on the site allocation process and drafting of policies. If you have any specific queries on these sites we would be happy to look at these separately.

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU

Telephone 01223 58 2749 HistoricEngland.org.uk

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Glossary

It would be helpful to refer to paragraph 140 of the NPPF in the definition for enabling development.

Monitoring

The monitoring indicators listed are appropriate; we are particularly pleased to see that a monitoring indicator is in place for Heritage at Risk.

Conclusion

In preparation of the forthcoming Local Plan we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

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. We hope that the above comments of assistance.

Sincerely

[Redacted signature]

Historic Environment Planning Advisor
katie.parsons@historicengland.org.uk



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Telephone 01223 58 2749 HistoricEngland.org.uk

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