

Appendix 16: Site Selection Methodology in relation to Heritage Assets

1.0 The following methodology identifies the approach taken to assessing potential sites for the Local Plan.

2. Scoring Table

2.1 In order to be able to assess the sustainability of sites we formulated a table which set out 19 assessment criteria and a wide range of economic, social and environmental indicators considered to be of importance based on evidence found within the SA Scoping Report. Each indicator was attributed a score based on the positive or negative nature of the impact.

2.2 The intention was that the criteria, indicators and scores together would help us work out which sites are more sustainable, which would help ensure that more sustainable sites are selected for allocation in the new South East Lincolnshire Local Plan.

2.3 To enable us to compare the sustainability of sites within a settlement and across the area we also put together a weighting methodology which would enable us to rank the sites.

2.4 The original copy of the scoring table in relation to heritage assets is as below:

Table 1

Assessment Criteria	Indicator	Score	Date Source
Impact on historical assets (e.g. Scheduled Ancient Monuments, listed buildings, conservation areas, archaeological remains, historic gardens and parks)	Positive impact on historic asset	4	GIS, Google Maps/Street View & SHDC/BBC SHLAA information, officer knowledge
	No impact as there is no known heritage asset, conservation area or other cultural asset on the site, or in close proximity to the site	2	
	Impact unknown or minor impact (depending on implementation)	1	
	Significant adverse impact (substantial harm to asset or asset destroyed)	0	

2.5 In May/June 2015 we consulted on various aspects of the Sustainability Appraisal including the scoring table. In relation to the 'Impact on Heritage Assets' criterion, Claire Searson raised concerns (June 2015) that the indicators were either not broad enough, were ambiguous or conflicted with the NPPF and that proximity was being used to gauge whether or not there would be an impact. Claire subsequently sent us an email (dated 6th July 2015) setting out Historic England's suggested wording for the indicators. Following this, we changed the assessment criteria and indicators to the wording proposed by Claire - highlighted in the table below.

Table 2

Assessment Criteria	Indicator	Score	Date Source
Impact on heritage assets Potential for impacts upon heritage assets and their setting. Designated Assets: <ul style="list-style-type: none"> • Conservation Area • Listed buildings • Scheduled Monuments • Registered Park or Garden. Non-designated assets: <ul style="list-style-type: none"> • Locally Listed Buildings • Archaeology • Other information contained on the HER 	Heritage assets are protected and enhanced and/or has a positive effect on the historic environment including tackling heritage at risk or provides an opportunity to better reveal the significance of heritage assets.		GIS, Google Maps/Street View & SHDC/BBC SHLAA information, officer knowledge
	No impact – no heritage assets or their settings are likely to be affected by the site allocation.		
	The site would result in harm to the significance of heritage assets and/or their setting. It is likely that impacts can be avoided/mitigated.		
	The site would result in harm to the significance of heritage assets and/or their setting. It is unlikely that impacts can be avoided/mitigated.		

2.6 Claire also raised strong concerns about the scoring system and the weighting of the social, economic and environmental scores, recommending that significant changes to the scoring system should be made. Following on from this and after discussions with other consultees, including the Environment Agency, it was decided that the scoring system would not be used **at all**. Therefore the scoring table as agreed with consultees to be used in the site assessment process is as Table 2.

3.0 Consultation on the draft Local Plan (January-February 2016)

3.1 Between consulting on the various elements of the sustainability appraisal in mid-2015 and our consultation on the draft Local Plan in January-February 2016, Claire Searson left Historic England and subsequent correspondence was from Emilie Carr.

3.2 In Emilie’s response (dated 17th February 2016), it was stated that:

- ‘strong concern remains regarding the Sustainability Appraisal and in particular the site assessment criteria’; non-designated assets had not been included within ‘Impact on heritage assets’ (although the additional reference to archaeology was welcomed). Non-designated assets, including locally listed buildings, archaeology and other information contained on the HER should also be identified in the assessment criteria so that a full assess of the impact upon heritage assets could be undertaken;
- there were ‘significant concerns in relation to the site assessments, which have little reference to heritage assets’;

- 3.3 An email exchange between Karen Johnson (Local Plans, SHDC) and Emilie in March 2016, followed up with a telephone conversation with Emilie on 14th April 2016 led to an acceptance by Emilie that the scoring system had been deleted in accordance with Historic England advice.
- 3.4 However there were still concerns regarding the assessments for individual sites. Karen acknowledged that due to resource constraints specialist Conservation Officer advice had not been secured to date, but that this had been rectified and as a result the site assessments would shortly be refreshed, using the criteria in Table 2.

4.0 Site assessment by Conservation Officer and the Borough's Consultant Architect

- 4.1 In order to address the concerns raised regarding individual site assessments, Historic England's responses to the consultation on the draft Local Plan (dated 17th February 2016) were forwarded to South Holland District Council's Conservation Officer and Boston Borough Council's Consultant Architect.
- 4.2 The site assessment undertaken by the Conservation Officer and the Consultant Architect was primarily a desk-top based assessment, though undertaken with a working knowledge of the area. Where appropriate, evidence submitted as part of pre-application proposals and as part of planning applications was also taken into account. The criteria used to identify the level of impact were provided by the Local Plans Team (as Table 2), which had previously been agreed with Historic England. The assessment took 3 days to complete.
- 4.3 The Local Plan is a strategic document, therefore it is considered appropriate that the assessment of sites reflects that, as well as the level of evidence available at that point. At a strategic level, the significance of the heritage asset(s), including designated and non-designated assets and their settings was considered, alongwith the relationship of the site to the heritage asset. The assessment was proportionate to the asset. Consideration was also given to any impact development on each site could have on the significance of that asset.
- 4.4 It is considered appropriate for the SA to highlight to Planning Officers those sites where heritage impacts exist, and whether further information could help address impacts should a site be taken forward (justified by other sustainability considerations in the SA, and other evidence based documents). This approach enables Officers to make an informed judgement as to whether a site is likely to come forward when compared to other sites that do not have similar issues. Therefore the Conservation Officer and the Consultant Architect have highlighted where further assessment would be required to identify heritage sensitivities and/or whether a suitable design could help address issues identified. At planning application stage it would therefore be clear that a further detailed assessment would be required to enable the Local Planning Authorities to assess the heritage implications of a scheme.

4.5 The Conservation Officer/Consultant Architect's views have been incorporated into the most recent version of the Sustainability Appraisal site assessments, which were consulted upon during the Preferred Sites consultation in July-August 2016.

5.0 Preferred Sites for Development consultation (July-August 2016)

5.1 We have read your response to the most recent consultation and hopefully have addressed your concerns below.

Revised Policy 12 and proposed development sites

- a) We trust the above explanation clarifies the assumptions made for heritage assets and their setting, in relation to the SA;
- b) We accept that as a result of working to a tight timescale unfortunately we were not able to provide an updated SA: Non-Technical Summary as part of the consultation in July-August 2016, which would have set out the methodology in detail. However this does not mean that the assessment process has not fully considered the impact upon heritage (or any other matter);
- c) The site assessments published as part of the Preferred Sites consultation in July-August 2016 have clearly been updated (from those published in January 2016) and form the most up-to-date position in relation to evidence. However as the SA is an iterative process, there remains an opportunity to update again as a result of the Preferred Sites consultation, and responses received;
- d) In the Housing Papers for each higher tier settlement (published in July 2016 to accompany the consultation), Planning Officers considered whether the potential sites (consulted upon in January 2016) should be taken forward as Preferred Sites, based on all the evidence information available, including the SA, as well as responses made in relation to specific sites and the historic environment recorded as part of the January-February 2016 consultation. A view was taken by Officers to determine whether heritage matters were of such significance to lead to a site being discounted. If this was not the case, then reasons were given to justify the site's progression;
- e) All comments received in relation to both the January and July consultations have been reported to, and discussed by, the Joint Strategic Planning Committee; papers and minutes are available at www.southeastlincslocalplan.org ;
- f) New sites or alternative sites that are proposed to be taken forward as Preferred Sites have also been assessed by the Conservation Officer;

5.2 Table 3 below sets out how/where the historic environment has been considered in the Housing Papers and what the outcome was.

6.0 Moving from Preferred Sites to Allocations in the Publication Draft Local Plan

- 6.1 The next stage is moving from Preferred Sites to Allocations. A second set of Housing Papers are being prepared to address comments made. Planning Officers considered whether the Preferred Sites (or new/alternative sites) should be taken forward as Allocations. In the Housing Papers (based on all the evidence base information available, including the SA) a view was taken to determine whether heritage matters were of such significance to lead to a site being discounted. If this was not the case, then reasons will be given to justify the site's progression. These could include whether the development of a site could lead to greater public access, understanding and interpretation of the asset, creation of new viewpoints to the asset and/or repair/regeneration of the asset. Informed by the Conservation Officer/ Consultant Architect's and Historic Environment Officer's advice, Officers will also consider whether a reduced site area and/or density, good quality design in terms of layout, massing, height of buildings, choice of materials, provision of open space, and protection of important views could all help minimise the impact development of a site could have on an asset(s).
- 6.2 The draft Local Plan is being revised to take account of comments made in January-February 2016 and July-August 2016. Amendments are being made to various Local Plan policies and/or their reasoned justification to ensure that heritage assets are afforded a high level of protection in the Local Plan area. For example, this can be through a site-specific policy for a Sustainable Urban Extension where there is a requirement for a statement of significance (or equivalent), or reference to the use of design codes or design guides to ensure that heritage assets are sympathetically integrated in the design of new development. A dedicated policy relating to the Historic Environment has also been prepared; responses submitted by Historic England have been accommodated, where possible, to ensure that there is a robust strategy for heritage in South East Lincolnshire moving forward.
- 6.3 The same approach identified above is being used to assess employment and retail sites. In the case of retail sites, a call for sites was issued in July 2016 – any new sites will be assessed by the Conservation Officer to determine the impact upon heritage assets.

7.0 Historic England's response to this SA Methodology Statement

- 7.1 The above statement was sent to Historic England on 27th September 2016 and a response was received on 4th November 2016. The full response is set out in Appendix 1. Following consideration of Historic England's response, the Local Plan team contacted Historic England on 11th November 2016 with a number of proposals to address their concerns relating to site selection (see Appendix 2). Historic England agreed that the Local Plan team's proposals would be a comprehensive approach to considering the impact of potential development allocation sites on the significance of heritage assets and their settings.
- 7.2 Assessment therefore proceeded on this basis, and further detailed assessment was undertaken by the Conservation Officer/Consultant Architect as well as by Lincolnshire County Council's Historic Environment Officer whose input is outlined below.

8.0 Site assessment by Lincolnshire County Council's Historic Environment Officer

- 8.1 In order to further alleviate Historic England's concerns, the potential housing sites have all been subject to a very rapid high level appraisal of the archaeological potential of each site. Each of these sites, where identified, all have archaeological potential and the archaeological requirements will differ from site to site and are very dependent on current land use (this has not formed part of this exercise) and the exact development proposals.

Further archaeological work will be undertaken in line with paragraph 128 of the NPPF. All developments should include a Heritage Assessment and dependant on the results further work prior to determination may be required to including assessments such as field walking, geophysical survey and trial excavation. There may then be additional requirements to further protect significant archaeology in situ or to record any archaeology before its destruction.

Table 3

Settlement	Site	Historic England comment	Outcome
Boston	Nor013	Site Nor013 will adjoin Spilsby Road Conservation Area. Further assessment is required to determine the impact on the significance of this heritage asset.	<p><i>Conservation Officer (reported in the SA) –</i> Nor013 does not adjoin the Spilsby Conservation Area boundary; there is an area of open land, albeit small between the site and the CA. The site is, however, a large site and due to proximity and juxtaposition will be visible from within the CA. Would give this a negative rating in the SA - further site work is required to investigate whether impact can be addressed by design.</p> <p><i>Officer response in Boston Housing Paper (July 2016) –</i> The site does not immediately adjoin the Conservation Area, and it is not accepted that its development would have substantive impacts upon this heritage asset.</p> <p><i>Conclusion –</i> this site was not taken forward as a Preferred Housing Site because the Sustainability Appraisal (including the heritage assessment) of the site is poor, the site does not relate as well to the town as other major sites, there are ownership issues and it would not be able to contribute directly to the Boston Distributor Road.</p>
	Nor014	Site Nor014 adjoins Boston Cemetery Registered Park and Garden to the south. The cemetery includes three Grade II Listed buildings. The proposed site will significantly impact upon the setting of the cemetery. 19th century cemeteries, of which this is a very good example, were located in order to provide an Arcadian setting following the Roman tradition of locating cemeteries outside the settlement boundary. Whilst the town has grown up around the cemetery to the south it remains open to the north and so some of that character remains; there is some low level development to the north but it remains largely open. Development to the north would impact despite the ornamental	<p><i>Conservation Officer (reported in the SA) –</i> agree with HE as the development of the site would harm the historic significance of the asset as well as the setting. Would categorise this site as very negative.</p> <p><i>Officer response in Boston Housing Paper (July 2016) –</i> At present, there is development on the opposite side of Red Cap Lane along approximately 44% of the Cemetery’s northern boundary. The allocation of site Nor014 might lead to the development of the remainder, which would be likely to have some impact upon the setting to the Registered Park and Garden. However, site Nor014 is large in size and would be likely to include substantial areas of open space and, provided a significant area of open space was created at the Red Cap Lane frontage, it is considered that such impacts could be mitigated.</p>

Settlement	Site	Historic England comment	Outcome
		planting having grown out to block views.	<i>Conclusion</i> – this site was not taken forward as a Preferred Housing Site due to its poor Sustainability Appraisal (including heritage assessment) and ownership issues.
	Sou006	Sou006 will surround Scheduled Monument 1019528 "Moated site north east of Wyberton Hospital" to the south and west. It is not considered that the impact of near complete enclosure could be mitigated, given the existing open views which form an intrinsic part of the scheduled monument's setting.	<p><i>Conservation Officer (reported in the SA)</i> – Agree with HE comments and would categorise the site as very negative in the SA as the harm to the significance of the asset, of which its setting is a major component, cannot be mitigated by design.</p> <p><i>Officer response in Boston Housing Paper (July 2016)</i> – The site abuts the Scheduled Ancient Monument, but it is large in size and would be likely to include substantial areas of open space and, provided a significant area of open space was created in the vicinity of the Ancient Monument, it is considered that adverse impacts could be mitigated.</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, on balance, this site should be taken forward as a Preferred Housing Site because the Sustainability Appraisal identifies that the site is able to deliver numerous sustainability benefits to Boston including being able to contribute directly to the provision of the Boston Distributor Road. The site also relates well to the town's built up area and confidence in its achievability is high.</p>
	Nor006	Nor006 adjoins Boston Cemetery Registered Park and Garden to the south. The cemetery includes three Grade II Listed buildings. The proposed site will significantly impact upon the setting of the cemetery. 19th century cemeteries, of which this is a very good example, were located in order to provide an Arcadian setting following the Roman tradition of locating cemeteries outside the settlement boundary. Whilst the town has grown up around the cemetery to the south it remains open to the	<p><i>Conservation Officer (reported in the SA)</i> – Agree with HE as the development of the site would harm the historic significance of the asset as well as the setting. Would categorise as very negative in the SA.</p> <p><i>Officer response in Boston Housing Paper (July 2016)</i> – Site Nor006 does not adjoin the Cemetery – it is separated from it by existing frontage dwellings on the northern side of Red Cap Lane. The site's development would not materially impact upon the 'openness' of land to the north of the Cemetery.</p>

Settlement	Site	Historic England comment	Outcome
		north and so some of that character remains; there is some low level development to the north but it remains largely open. Development to the north would impact despite the ornamental planting having grown out to block views.	<i>Conclusion</i> – although the heritage impact is acknowledged, on balance, it is considered that other sustainability benefits identified in the Sustainability Appraisal including a less severe flood risk than when compared to other potential Smaller Housing Sites, mean that on balance the site should be taken forward as a Preferred Housing Site.
Spalding	Mon010, Mon012, Mon013, Mon021	There are Scheduled Monuments (sub-surface cropmarks) to the South West of Spalding which indicate the wider archaeological sensitivity of the landscape. Archaeological advice and further assessment are required to determine the impact of this site on the significance of heritage assets.	<p><i>Conservation Officer (reported in the SA)</i> – The potential for a minor impact on the grade II listed Horseshoe Bridge is noted in relation to sites Mon013 and Mon021, although no significant concerns were raised regarding any of these four sites.</p> <p><i>Officer response in Spalding Housing Paper (July 2016)</i> – it is acknowledged that there are Scheduled Monuments to the southwest of Spalding, but it is considered that with careful layout and design (informed by archaeological advice and assessment) that impacts are likely to be acceptable.</p> <p><i>Conclusion</i> – these sites were not taken forward as Preferred Housing Sites due to their Sustainability Appraisal (including heritage assessment), as well as concerns relating to flood risk, and prejudicing the delivery of future stages of the Spalding Western Relief Road safeguarding corridor.</p>
Donington	Don032	Site Don032 is the only surviving open space adjacent to the Church of St Mary and the Holy Rood, and the graveyard and would adversely harm this Grade I Listed Building and its setting.	<p><i>Conservation Officer (reported in the SA)</i> – development of Don032 would harm the traditional setting of a site of significant heritage value.</p> <p><i>Officer response in the Donington Housing Paper (July 2016)</i> – the Grade I Listed Church of St Mary and the Holy Rood are important designated heritage assets forming an integral part of the character and appearance of Donington and its Conservation Area. Historic England consider that the development of Don032 could harm these assets and their setting; adverse impacts are unable to be prevented by design.</p> <p><i>Conclusion</i> – this site was not taken forward as a Preferred Housing</p>

Settlement	Site	Historic England comment	Outcome
			Site, primarily because of the adverse impact upon a designated heritage asset and the findings of the Sustainability Appraisal (including the heritage assessment).
	Don033	Don033 partially adjoins Donington Conservation Area. Further assessment is required to determine the impact on the significance of these heritage assets.	<p><i>Conservation Officer (reported in the SA)</i> – acknowledges that part of the boundary adjoins the Conservation Area. Any development proposal should be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Donington Housing Paper (July 2016)</i> – the site abuts the Donington Conservation Area for 110m and, with careful layout, design and choice of materials it is considered that impacts are highly likely to be acceptable.</p> <p><i>Conclusion</i> – this site was not taken forward as a Preferred Housing Site due to its Sustainability Appraisal (including the heritage assessment) and the fact that its allocation would exceed the housing requirement for Donington.</p>
Holbeach	Hob042	The Grade II Listed The Old Cottage lies within Hob042. Further assessment is required to determine the impact on the significance of these heritage assets.	<p><i>Conservation Officer (reported in the SA)</i> – a Heritage Impact Assessment should be undertaken in the first instance to assess the extent of the setting and how it contributes to the significance of the building.</p> <p><i>Officer response in the Holbeach Housing Paper (July 2016)</i> – Hob042 incorporates the Grade II Listed The Old Cottage. It is considered that with careful layout, design and choice of materials that the impacts are likely to be acceptable.</p> <p><i>Conclusion</i> – considered as part of the wider Hob048; although the heritage impact is acknowledged, the site should be taken forward as a Preferred Housing Site because the Sustainability Appraisal identifies that the site is able to deliver numerous sustainability benefits to Holbeach including helping to provide for significant highways improvements. It is considered that the wider site is significant and offers the potential to incorporate substantial areas of open space to mitigate any heritage and landscape impacts identified.</p>

Settlement	Site	Historic England comment	Outcome
			Furthermore Hob042 is part of a Sustainable Urban Extension and will be covered by a specific policy in the Local Plan which can incorporate requirements relating to heritage to ensure that appropriate measures are incorporated in a masterplan for the site.
	Hob002	Further assessment is required to determine the impact of the site on the significance of the Grade II Listed Manor House, the historic village and views to the church.	<p><i>Conservation Officer (reported in the SA)</i> - The openness of the farmland is an integral part of the historic setting of the Grade II Listed Building. The development of the site would harm the traditional setting of the heritage asset.</p> <p><i>Officer response in the Holbeach Housing Paper (July 2016)</i> – Hob002 incorporates the Grade II Listed Manor House but it is considered that with careful layout, design and choice of materials that impacts upon it, the historic village and views of the church are likely to be acceptable.</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, the site should be taken forward as a Preferred Housing Site because the Sustainability Appraisal identifies that the site is able to deliver a range of other sustainability benefits including provision for open space, a primary school, affordable housing and a financial contribution towards the Peppermint Junction improvements. The site is significant and offers the potential to incorporate substantial areas of open space to mitigate any heritage and landscape impacts identified. The site also has planning permission subject to a s106 agreement so the principle of locating developing on Hob002 has effectively been agreed.</p>
Kirton	Kir037	Kir037 would adjoin Kirton Conservation Area. Further assessment is required to determine the impact on the significance of this heritage asset.	<p><i>Conservation Officer (reported in the SA)</i> – Any development proposal should be informed by a heritage impact assessment.</p> <p><i>Officer response in the Kirton Housing Paper (July 2016)</i> – the site abuts the Conservation Area for a length of just 6.5m and, with careful layout, design and choice of materials it is considered that impacts are highly likely to be acceptable.</p>

Settlement	Site	Historic England comment	Outcome
			<p><i>Conclusion</i> – although the heritage impact is acknowledged, it is considered that other sustainability benefits identified in the Sustainability Appraisal, including a less severe flood risk than when compared to other Potential Sites mean that, on balance, with good design and careful choice of materials the site can be developed, and taken forward as a Preferred Housing Site.</p>
Long Sutton	Los023	Los023 adjoins Long Sutton Conservation Area to the north. Further assessment is required to determine the impact on the significance of these heritage assets.	<p><i>Conservation Officer (reported in the SA)</i> – The access to the site is on to London Road but the site as a whole sits behind this frontage and therefore there is little potential impact on the townscape of this key thoroughfare as the Conservation Area is approached from the south. The site also abuts the rear boundary of Adderley House, a Grade II listed building. The site, presently a nursing home, has 20th Century development at the rear. This limits views of the site from within the curtilage.</p> <p><i>Officer response in the Long Sutton Housing Paper (July 2016)</i> – Los023 adjoins Long Sutton Conservation Area and, with careful layout, design and choice of materials it is considered that impacts are likely to be acceptable.</p> <p><i>Conclusion</i> – the site should not to be taken forward as Preferred Housing Site as the site is no longer available.</p>
Sutterton	Sut009	Site Sut009 would impact upon open views to both the Grade I Listed Church of St Mary and the historic village due to the scale of the proposal. The assessment of sustainability in respect of these allocations is defective as it fails to address these impacts.	<p><i>Conservation Officer (reported in the SA)</i> – The curtilage of the church is separated from the site by the curtilages of a Hotel on Station Road and the mill off Spalding Road. Notwithstanding the physical separation, due to the extensive size of the site it will impact on open views that presently form the wider setting of the church and churchyard.</p> <p><i>Officer response in Sutterton Housing Paper (July 2016)</i> – It is considered that the development of this site would have relatively little impact upon open views of the listed Church and the historic village. Such views are available only at great distance and are already (at least partially) obscured by existing development.</p>

Settlement	Site	Historic England comment	Outcome
			<p>Nonetheless, the site is large in size and offers opportunities for any particularly valuable views to be retained or framed within a residential layout</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, it is considered that other sustainability benefits identified in the Sustainability Appraisal including a less severe flood risk than when compared to other potential sites and the ability to deliver local infrastructure more effectively than several smaller sites, mean that, on balance, the site should be taken forward as a Preferred Housing Site. The site is a large-scale and offers the potential to incorporate areas of open space to mitigate any heritage and landscape impacts identified particularly if developed in accordance with a comprehensive masterplan.</p>
	Sut028	Site Sut028 would impact upon open views to both the Grade I Listed Church of St Mary and the historic village due to the scale of the proposal. The assessment of sustainability in respect of these allocations is defective as it fails to address these impacts.	<p><i>Conservation Officer (reported in the SA)</i> - The curtilage of the church is separated from the site by the curtilages of a Hotel on Station Road and the mill off Spalding Road. Notwithstanding the physical separation, the site will potentially impact on open views that presently form the wider setting of the church and churchyard.</p> <p><i>Officer response in the Sutterton Housing Paper (July 2016)</i> – It is considered that the development of this site would have relatively little impact upon open views of the listed Church and the historic village. Such views are available only at great distance and are already (at least partially) obscured by existing development.</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, it is considered that other sustainability benefits identified in the Sustainability Appraisal including a less severe flood risk than when compared to other potential sites mean that, on balance, the site should be taken forward as a Preferred Housing Site.</p>
Swineshead	Swi036	The site may impact upon the Manwar Ings Scheduled Monument. Further assessment is required to determine the impact of this	<i>Conservation Officer (reported in the SA)</i> - The expansion of Swineshead during the 20th century has brought development closer to the monument due south of the site (see Swi039 below). The site

Settlement	Site	Historic England comment	Outcome
		<p>potentially intrusive development into the historic landscape, including the sustainability of the extent of development in relation to the Scheduled Monument.</p>	<p>has been partially developed with a plant nursery. The land that extends from the nursery to the drain could be considered to form part of the wider setting of the monument. Due to the size of the site it is likely that its development would harm the setting of a significant heritage asset.</p> <p><i>Officer response in the Swineshead Housing Paper (July 2016) –</i> At present, the built-up area of Swineshead approaches no closer than 380m to the Scheduled Ancient Monument. The development of site Swi036 would bring it to within 315m. It is considered that this would still represent sufficient separation to preserve the Monument’s setting, but it is acknowledged that this is an issue that does not affect the majority of the other Potential Housing Sites in Swineshead.</p> <p><i>Conclusion –</i> this site was not taken forward as a Preferred Housing Site due to its Sustainability Appraisal, primarily the impact identified upon the Manwar Ings Scheduled Monument) and because of ownership/deliverability concerns.</p>
	Swi039	<p>The site may impact upon the Manwar Ings Scheduled Monument. Further assessment is required to determine the impact of this potentially intrusive development into the historic landscape, including the sustainability of the extent of development in relation to the Scheduled Monument.</p>	<p><i>Conservation Officer (reported in the SA) -</i> The expansion of Swineshead during the 20th century has brought development closer to the monument. This site is an extension of that development, taking housing closer to the scheduled site. Due to the location of the site it is likely that its development would harm the setting of a significant heritage asset.</p> <p><i>Officer response in Swineshead Housing Paper (July 2016) –</i> At present, the built-up area of Swineshead approaches no closer than 380m to the Scheduled Ancient Monument. The development of site Swi039 would bring it to within 360m. It is considered that this would still represent sufficient separation to preserve the Monument’s setting, but it is acknowledged that this is an issue that does not affect the majority of the other Potential Housing Sites in Swineshead.</p> <p><i>Conclusion –</i> this site was not taken forward as a Preferred Housing</p>

Settlement	Site	Historic England comment	Outcome
			Site due to its Sustainability Appraisal primarily due to the impact identified upon the Manwar Ings Scheduled Monument and because of flood risk concerns.
Bicker	Bic014	The site adjoins the Bicker Conservation Area to the south.	<p><i>Conservation Officer (reported in the SA)</i> – The existing access track at the entrance to the site from Gauntlet Road is within the CA. The frontage of the site would be sensitive to new development. There is the potential for harm to the setting of the CA. Any development proposal would need to be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Bicker Housing Paper (July 2016)</i> – 2.5% (0.05 hectares) of this site lie within the Bicker Conservation Area and, with careful layout, design and choice of materials it is considered that impacts are likely to be acceptable.</p> <p><i>Conclusion</i> – this site should not be taken forward as a Preferred Housing Site because of Sustainability Appraisal (including the heritage assessment) and highways concerns.</p>
	Bic020	Bic020 may impact upon the setting of the Grade I listed Church of St Swithin, which, as a site split into three sections, could infill important remaining open space surrounding the church.	<p><i>Conservation Officer (reported in the SA)</i> – This site comprises three small parcels of land in the historic core of the village. This side of the village was historically open land which contrasts with the traditional dense frontage development on the other side of the High Street. The infilling of this frontage would therefore impact on the character of the conservation area.</p> <p><i>Officer response in the Bicker Housing Paper (July 2016)</i> – The sensitivity of the site is accepted. With careful layout, design and choice of materials it is likely that impacts would be acceptable, but this is an issue which does not affect alternative sites.</p> <p><i>Conclusion</i> – this site should not be taken forward as Preferred Housing Site because of the outcome of the Sustainability Appraisal (including the heritage assessment) and availability issues.</p>
Fleet	Fle017	Fle017 is within the Conservation Area in an	<i>Conservation Officer (reported in the SA)</i> - The site sits within the

Settlement	Site	Historic England comment	Outcome
Hargate		area of existing open space, potentially impacting upon this and other heritage assets. Further investigation will be required.	<p>Conservation Area and is located in the historic core of the village. The village envelope and CA coincide along the rear boundary of the site. Backland development is a feature of the Fleet Road frontage at this location. Any development proposal would need to be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Fleet Hargate Housing Paper (July 2016) –</i> A new larger site was submitted as part of the January 2016 consultation (Fle020), which includes most of this site, except for the part with planning permission for a dwelling fronting Fleet Road. The impact on the Conservation Area will need to be assessed and designed for.</p> <p><i>Conclusion –</i> although the heritage impact is acknowledged, it is considered that other sustainability benefits identified in the Sustainability Appraisal, mean that, on balance, the site (as Fle020) should be taken forward as a Preferred Housing Site, as long as good quality design and careful layout is adopted.</p>
Gedney Hill	Geh012	Site Geh012 adjoins the curtilage of the Grade II Listed Church of Holy Trinity. Concerns are raised in relation to the setting of the Grade I Church.	<p><i>Conservation Officer -</i> The site abuts the church wall and will be visible from within the churchyard. The present views are across the site to the rear of properties fronting Highstock Lane. There is the potential for harm to the wider setting of the church. Any development proposal would need to be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Gedney Hill Housing Paper (July 2016) –</i> Geh012, runs against the church yard, only being separated by a footpath therefore the development of this site would have a potentially adverse impact.</p> <p><i>Conclusion –</i> this site should not be taken forward as Preferred Housing Site primarily because of its impact on the listed Church and its Church yard.</p>
Moulton	Mou028	There is the potential for impact upon setting of	<i>Conservation Officer (reported in the SA) -</i> The site contributes to the

Settlement	Site	Historic England comment	Outcome
Chapel		the Grade II* listed Chapel of St James and further assessment would be required.	<p>wider setting of the mill. Its urbanisation would impact on that setting.</p> <p><i>Officer response in the Moulton Chapel Housing Paper (July 2016)</i> – Historic England is concerned about the impact on the Chapel of St James. Owing to frontage development on Roman Bank and Woodgate Road there is no view between the two. However, there is a listed mill to the rear of the properties on Roman Bank whose setting could be impacted by development on this site.</p> <p><i>Conclusion</i> – this site should not to be taken forward as a Preferred Housing Site because of the Sustainability Appraisal, including the identified impact on the setting of the Grade 2 listed mill.</p>
	Mou030	There is the potential for impact upon setting of the Grade II* listed Chapel of St James and further assessment would be required.	<p><i>Conservation Officer (reported in the SA)</i> - The site contributes to the wider setting of the mill. Its urbanisation would impact on that setting.</p> <p><i>Officer response in the Moulton Chapel Housing Paper (July 2016)</i> – Historic England is concerned about the impact on the Chapel of St James. Owing to frontage development on Roman Bank and Woodgate Road there is no view between the two. However, there is a listed mill to the rear of the properties on Roman Bank whose setting could be impacted by development on this site.</p> <p><i>Conclusion</i> – this site should not to be taken forward as a Preferred Housing Site because of a poor Sustainability Appraisal, including the heritage assessment.</p>
Old Leake	Old005	Site Old005 may affect the setting of the Grade I Listed Church of St Mary. Concern is raised at the inclusion of this site, which has remained open within the centre of the village and detailed further assessment would be required.	<p><i>Borough Council's Consultant Architect (reported in the SA)</i> - the site "is in the centre of the village but is separated from the church by the two residential sites of the Old Vicarage and the Grange. Provided the hedged tree lined boundaries between the church and The Vicarage and The Grange remain, some development on the site ... could be considered provided this was a low density scheme and one which retained some form of green at its centre to maintain a village-like character. Traditional materials would be required and the majority should be two-storey development."</p>

Settlement	Site	Historic England comment	Outcome
			<p><i>Officer response in the Old Leake Housing Paper (July 2016) –</i> The site is located some 60m from the curtilage to the listed church, and it is not considered that it forms a substantive part of the listed building's setting. Consequently, it is not accepted that this site is unsuitable for development in principle, although the Consultant Architect's comments mean that the capacity of the site will need to be reconsidered.</p> <p><i>Conclusion –</i> although the heritage impact is acknowledged, it is considered that with a reduced site capacity to reflect the Consultant Architect's comments, as well as other sustainability benefits identified in the Sustainability Appraisal, including the least severe flood risk of any site in Old Leake, means that, on balance, the site should be taken forward as a Preferred Housing Site.</p>
Surfleet	Sur006	Site Sur006 has the potential to impact on views from the Grade I Listed Church of St Lawrence, which is not reflected within the Sustainability Appraisal. Further assessment would be required.	<p><i>Officer response in the Surfleet Housing Paper (July 2016) –</i> Planning permission has been granted on part of Sur006 for a mix of bungalows and chalet bungalows. The site boundary is screened by buildings on three sides, which will together prevent visual harm to the setting of the church.</p> <p><i>Conclusion –</i> this site should be taken forward as a Preferred Housing Site because planning permission has been granted; therefore the impact of development on views of the listed church are considered to be acceptable and the site is more deliverable than other options.</p>
Sutton St James	Suj007	Impact upon the setting of the Grade II* Tower of St James church will require assessment. This is not reflected within the Sustainability Appraisal.	<p><i>Conservation Officer (reported in the SA) -</i> The entrance to the site faces two listed buildings; the Chancel to the Church of St James which is Grade II listed and the separate Tower to the Church of St James which is Grade II* listed. Any development proposal would need to be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Sutton St James Housing Paper (July 2016) –</i> The setting of the Church is affected by the existing use, redevelopment for residential use offers the opportunity to create a</p>

Settlement	Site	Historic England comment	Outcome
			<p>development that enhances the nearby listed buildings and their settings.</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, it is considered that with appropriate design and layout and the other sustainability benefits identified in the Sustainability Appraisal, including the least severe flood risk on a previously developed site, mean that, on balance, the site should be taken forward as a Preferred Housing Site.</p>
Tydd St Mary	Tyd003	Tyd003, 006 and 008 will be directly to the south of Tydd St Mary Conservation Area and due to the size may impact upon the special character of the Conservation Area. Further investigation will be required.	<p><i>Conservation Officer (reported in the SA)</i> - The site abuts the Conservation Area boundary for over half of its Rectory Road frontage. Any development proposal should be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Tydd St Mary Housing Paper (July 2016)</i> – This is a very large site holding 174 dwellings. It is considered that this site will have a significant negative impact on the character of the village and its conservation area.</p> <p><i>Conclusion</i> – this site should not to be taken forward as a Preferred Housing Site because of the Sustainability Appraisal (including the heritage assessment) primarily that the size and scale of the site would have a negative impact on the character of the village and its Conservation Area.</p>
	Tyd006	Tyd003, 006 and 008 will be directly to the south of Tydd St Mary Conservation Area and due to the size may impact upon the special character of the Conservation Area. Further investigation will be required.	<p><i>Conservation Officer (reported in the SA)</i> – no concerns raised with regards to the impact of the site on the Tydd St Mary Conservation Area.</p> <p><i>Officer response in Tydd St Mary Housing Paper (July 2016)</i> – This site has limited impact on the Conservation Area, owing to it being 180m away from it, but is only appropriate in conjunction with Tyd003 because it rounds off the resulting village. However, on its own it would be an incongruous group of dwellings in the countryside which would harm the character of the countryside and the village.</p>

Settlement	Site	Historic England comment	Outcome
			<p><i>Conclusion</i> – this site should not be taken forward as a Preferred Housing Site because of its Sustainability Appraisal (including heritage assessment), and because it would be an inappropriate form of development harming the character of the countryside and the village.</p>
	Tyd0008	Tyd003, 006 and 008 will be directly to the south of Tydd St Mary Conservation Area and due to the size may impact upon the special character of the Conservation Area. Further investigation will be required.	<p><i>Conservation Officer (reported in the SA)</i> - The Common Way frontage to the site is within the Conservation Area. The remainder of the site abuts the Conservation Area boundary along its Rectory Road frontage. Any development proposal should be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Tydd St Mary Housing Paper (July 2016)</i> – This site is a large grassed area bounded by well-managed hedges which contributes positively to the character of this part of the village and its conservation area. A development of 36 dwellings would enclose the open nature of this part of the historic part of the village and change the character of the conservation area.</p> <p><i>Conclusion</i> – this site should not be taken forward as a Preferred Housing Site because of its Sustainability Appraisal, primarily because of the negative impact this site would have on the character of this part of the village and the Conservation Area. Its development costs would also be higher owing to a need to improve the sewerage network and its position in the Conservation Area.</p>
Weston	Wsn007	Site Wsn007 is directly to the north of the Grade I Listed Church of St Mary and the Churchyard Cross Scheduled Monument within the church curtilage. This site would be harmful in principle and therefore, serious concerns are raised.	<p><i>Conservation Officer (reported in the SA)</i> - The site is located to the rear of a site of significant heritage value that includes a scheduled ancient monument, the Church (which is a Grade I listed building) and a number of grade II listed structures in the churchyard. The site is presently an open field beyond which is the A151 bypass. The development of the site would impact on the traditional setting of the Church and churchyard.</p> <p><i>Officer response in Weston Housing Paper (July 2016)</i> – views of the church from the A151, to the north are screened by a roadside hedge.</p>

Settlement	Site	Historic England comment	Outcome
			<p>However, the site is much close to the churchyard and so the potential to affect the setting of the church is great.</p> <p><i>Conclusion</i> – this site should not be taken forward as a Preferred Housing Site because of the Sustainability Appraisal, including the potential harm to the setting of the listed church, poor access and a sequentially worse flood hazard and depth than other sites.</p>
	Wsn004	Site Wsn004 may impact upon the setting of the Grade I Listed Church of St Mary and the Churchyard Cross Scheduled Monument within the church curtilage. The Sustainability Appraisal does not reflect this concern. This site would be harmful in principle and therefore, serious concerns are raised.	<i>Officer response in Weston Housing Paper (July 2016)</i> - Wsn004 is part of Wsn022 and they should be considered together (see below).
	Wsn022	Site Wsn022 may impact upon the setting of the Grade I Listed Church of St Mary and the Churchyard Cross Scheduled Monument within the church curtilage. The Sustainability Appraisal does not reflect this concern. This site would be harmful in principle and therefore, serious concerns are raised.	<p><i>Conservation Officer (reported in the SA)</i> - The site is located due east of a site of significant heritage value that includes a scheduled ancient monument, the Church which is a Grade I listed building and a number of grade II listed structures in the churchyard. The site is presently an open field beyond which is the A151 bypass. Any development proposal should be informed by a Heritage Impact Assessment.</p> <p><i>Officer response in the Weston Housing Paper (July 2016)</i> – Views of the site are screened from Delgate Bank by a road side hedge and therefore from this vantage point the church will not be visible. Without the hedge most views of the church are screened by existing development on High Road and Small Drove. There are open views from the A151 but the church is screened by church yard trees. The tower is quite short and the top of the tower is only just visible amongst the trees in the church yard. A planning application for 60 dwellings has been submitted for the site; the layout leaves land adjacent the High Road to retain views of the church.</p> <p><i>Conclusion</i> – although the heritage impact is acknowledged, it is</p>

Settlement	Site	Historic England comment	Outcome
			considered that with appropriate design and layout, including the appropriate provision of open space (as agreed through the planning application process), and the other sustainability benefits identified in the Sustainability Appraisal, that, on balance, the site should be taken forward as a Preferred Housing Site.
Wigtoft	Wig009	The site will affect the setting of the Grade I listed Church of St Peter and St Paul. It is argued that it would be harmful in principle, given that it is sited directly to the west of the church, and will infill the open space surrounding the church. It is not considered that the quality of careful design and layout as suggested within the Sustainability Appraisal would overcome this significant concern.	<p><i>Conservation Officer (reported in the SA)</i> - The site is a narrow field in the historic core of the conservation area, separating the Church of St Peter and St Paul a Grade I listed building and churchyard from 20th century housing. It is in the centre of the Conservation Area. Development of the site would be considered harmful to the significance of the asset.</p> <p><i>Officer response in the Wigtoft Housing Paper (July 2016)</i> – The Borough Council’s Consultant Architect comments that “any development on this site will require a roadway opening up the front boundary and will by its proximity to the church make a significant change to its setting. It is difficult to see how this could be satisfactorily ameliorated and it is our opinion that new housing on this site would be detrimental to the setting of the Grade 1 listed church”.</p> <p><i>Conclusion</i> – this site should not be taken forward as a Preferred Housing Site, because of the Sustainability Appraisal; primarily because of the potential harmful impacts of the site’s development upon the neighbouring listed church.</p>
	Wig013	The site will affect the setting of the Grade I listed Church of St Peter and St Paul. It is argued that it would be harmful in principle, given that it is sited directly to the north of the church, and will infill the open space surrounding the church. It is not considered that the quality of careful design and layout as suggested within the Sustainability Appraisal would overcome this significant concern.	<p><i>Officer response in the Wigtoft Housing Paper (July 2016)</i> – The Borough Council’s Consultant Architect comments that “one of the significant aspects of the setting of this village church is its relationship to the fen landscape and the wide open skies and long views out from the churchyard across the fens. Enclosing the church at the rear will make a significant change to its wider landscape setting. It will interrupt or completely mask views of the tower and steeple from the north. It is difficult to see how this could be satisfactorily ameliorated and it is our opinion that new housing on this site would be detrimental to the setting of the Grade 1 listed church”.</p>

Settlement	Site	Historic England comment	Outcome
			<p><i>Conclusion</i> – this site should not to be taken forward as a Preferred Housing Site because of the Sustainability Appraisal; primarily because new housing on this site would be detrimental to the setting of the neighbouring Grade I listed church.</p>
Deeping St Nicholas	Spalding RFI	This site is to the south and east of Scheduled Monuments 1004981 and 1004980. There is a clear need to assess non-designated archaeological remains guided by the County Archaeological Adviser immediately to the north and north west of the site which contribute to the Scheduled Monument.	<p><i>Officer response</i> - the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in this Local Plan</p> <p><i>Conclusion</i> – this site should not be taken forward as a Preferred Employment Site because of the Sustainability Appraisal (including the heritage assessment) and by virtue that the site is no longer available.</p>
Crowland	Thorney Road	Crowland Abbey Scheduled Monument and the Grade I listed Crowland Abbey are to the north of the site. At present, the employment site forms part of the long open views which are of particular importance to the setting of the scheduled monument and the church. It is unclear if the site had been assessed within the SA. As such very strong concerns are raised.	<p><i>Conservation Officer response (reported in the SA)</i> - given the development of the A16 with its embankment at this location and the nature of modern employment site, there would be no heritage issue.</p> <p><i>Officer response</i> – the site is separated from Crowland built-up area by James Road and an area of green infrastructure. Planning permission has been granted for housing to the north of James Road which is within the open view corridor from Thorney Road.</p> <p><i>Conclusion</i> – this site should be taken forward as a Preferred Employment Site because of the Sustainability Appraisal, including because it has the potential to diversify the economic offer in Crowland and generate additional jobs. Furthermore, the LPA has granted planning permission for a housing development to the north of James Road, within the sight line of the Abbey from this site. This makes it difficult to discount this site on the basis of impact upon the setting of a heritage asset. Should that site be built, the views identified would be diminished considerably.</p>

NB: Following the January-February 2016 consultation, the status of Gedney Church End and Gosberton Risegate and Clough in the settlement hierarchy has been changed from a Minor Service Centre to an Other Service Centre and Settlement. As such, we are no longer proposing to allocate development sites in these settlements.

Appendix 1

Historic England's response to SA Methodology Statement

1



Karen Johnson
Senior Planning Policy Officer
South Holland District Council

Karen.johnson@sholland.gov.uk

4 November 2016

By email only

Dear Karen

**RE: SOUTH EAST LINCOLNSHIRE LOCAL PLAN – SA AND PREFERRED SITE
ADDITIONAL/COLLATED INFORMATION OCTOBER 2016**

Thank you for the information sent through in October. I am sorry I have not had the opportunity to respond before now.

The background information about the SA methodology is helpful but is the outcomes we have concern with in terms of some outcomes for sites being inconsistent with SHLAA assessments, Conservation Officer and Officer comments.

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This means that the plan as a whole, and including any sites it is putting forward for development allocations, has to set out a framework which is likely to conserve the historic environment of the Plan area. The inconsistencies between the different evidence base information sets, and as highlighted in the schedule of information set out in Table 3 of your October information, does not support that a positive strategy has been adopted in the approach to the Plan. There are sites where your heritage adviser advice has not been taken on board but there is no further assessment or evidence to set out how that conclusion has been reached. Please note that the summer consultation SA site assessment public interface webpages, e.g. Boston, do not have hyperlinks to access so January 2016 information was referred to in our comments.

Some examples of inconsistencies between evidence base material, including that available in Table 3 of your recent information, include the following:

e.g. Spalding Mon010, 012, 013, 021: SHLAA assessments – no adverse impacts on 'historic assets'; SA assessment – no significant historic features likely to be affected; Conservation Officer – no significant concerns; Officer response – impacts are likely to be acceptable (*what assessment was given to the SM setting and potential for unknown archaeology NPPF para.139?*);



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e.g. Donington Don032: SHLAA assessment – no adverse impact on ‘historic assets’; SA (Jan 16) assessment – could have adverse impacts on Conservation Area and Grade I Church of St Mary and Holy Rood; Conservation Officer – would harm the traditional setting of a site of significant heritage value; Officer response – adverse impacts are unable to be prevented by design;

e.g. Boston Nor013: SHLAA assessment – may have impact; SA (Jan 16) assessment – no significant historic features likely to be affected by development of the site; Conservation Officer – would give this a negative rating in the SA, further work is required to investigate whether impact can be addressed by design; Officer response – ‘it is not accepted that its development would have substantive impacts upon this heritage asset’ (*Apart from the inconsistencies between SHLAA, SA and Conservation officer and Officer information, what additional assessment has been undertaken for the Officer to reach their conclusion?*);

e.g. Thorney Road, Crowland – The Employment Technical Paper has no provision for the historic environment within its Environment section assessment, the SA does not recognise Crowland Abbey Grade I listed building and Scheduled Monument to be relevant to considerations. Table 3 of the recent information indicates that the Conservation Officer and Officer have no concerns about setting but there is no further exploration of the significance of the Abbey setting to substantiate these outcomes.

Of particular concern is where there are inconsistencies in the evidence base material as well as a difference of opinion between the Conservation Officer and Officer comments where sites have been taken forward as preferred sites as set out in the following examples:

Boston Sou006: SHLAA assessment – may have an impact on ‘historic assets’; SA (Jan 16) assessment – may have an impact; Conservation Officer – ‘the harm to the significance of the asset...cannot be mitigated by design’; Officer response – ‘adverse impacts could be mitigated’ (*What additional assessment of harm to the significance of the heritage asset and its setting has been undertaken in line with NPPF requirements for the Officer to reach their conclusion?*);

Boston Nor006: SHLAA assessment – no adverse impacts on any ‘historic assets’; SA (Jan 16) assessment – no significant features likely to be affected; Conservation Officer – ‘development of the site would harm the historic significance of the asset as well as the setting. Would categorise as very negative in the SA’; Officer response – ‘the site’s development would not materially impact upon the openness of land to the north of the Cemetery’ (*What additional assessment of harm to the significance of the heritage asset and its setting has been undertaken in line with NPPF requirements for the Officer to reach their conclusion?*); and,

Holbeach Hob002: SHLAA assessment – could have an adverse impact; SA assessment – indicates a negative red outcome; Conservation Officer – ‘the development of the site would harm the traditional setting of the heritage asset’; Officer response – mitigation could be achieved through design and layout (*What additional assessment of harm to the significance of the heritage asset and its setting has been undertaken in line with NPPF requirements for the Officer to reach their conclusion?*).



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The Plan puts forward a number of sites which, if developed, appear likely to affect the significance of one or more designated heritage assets in their vicinity. The allocation of a site for development within the Local Plan is, in effect, establishing that the principle of development in that particular location is acceptable. However, in the case of the Preferred Sites, there is currently a lack of meaningful evaluation of what impact the development of these areas might have on these heritage assets and their setting.

In the absence of any assessment of the degree of harm which the preferred site allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, at present, the authority cannot demonstrate that the sites it is putting forward for development is compatible with any of the joint Plan authorities extant policies for the protection of the historic environment, or proposed joint Plan policy(ies). Moreover, in terms of national policy guidance, the Plan also fails to demonstrate that:-

- The sites that it is putting forward for development will deliver a “positive strategy for the historic environment” as is required by NPPF Paragraph 126.
- The sites that are allocated will be likely to “contribute to protecting or enhancing the historic environment”. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment [NPPF Paragraph 7].
- The sites which it has allocated are likely to “conserve heritage assets in a manner appropriate to their significance”. Therefore it has not shown that it will be likely to deliver the Government’s objectives for the historic environment [NPPF Paragraph 17].
- It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.

At preferred option stage it should be clear whether a potential allocation site impacts on the setting of a heritage asset or not. The absence of any such evaluation must bring into question the deliverability of some of those sites and, for some, the amount of development they can accommodate.

It is not clear whether the Conservation Officer has provided comments for all SHLAA sites whether discounted or not. If they have then it would be useful to incorporate those comments into an updated SHLAA and review the SA further too. Historic England maintains its concerns about the approach to the historic environment within the Plan, particularly in relation to the development site selection process. We remain of the view that further assessment work should be undertaken in relation to sites, particularly at sites where the advice of your heritage adviser has not been taken on board.



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I am sorry not to be more positive but I hope that this information is of use to you at this time.

Yours sincerely

A handwritten signature in black ink, appearing to read 'RW', is centered on the page. The signature is written over a faint, repeating pattern of the words 'radio', 'electronic', and 'radio-electric'.

Rosamund Worrall
Historic Environment Planning Adviser



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Appendix 2

Local Plan team's proposals to address Historic England's concerns

- To have a strategic level heritage assessment (as in the SA) undertaken for all potential housing and employment sites (that were consulted upon in January 2016), and for all preferred retail sites (consulted upon in July 2016 – no potential retail sites were identified in January). For SHDC this will be by the Council's Conservation officer, for BBC sites this will be by the Council's Consultant Architect;
- The SHLAA will be updated to reflect comments made in the SA and by the specialist advice, and the SA will also be amended to ensure a consistent approach is taken for heritage. The housing, employment and retail papers that will be published alongside the Publication Draft (likely to be next year) will reflect the most up-to-date position at that time;
- The SHLAA and SA reports will be amended to identify the iterative nature of the process, and to make it clear that each report is a snapshot in time – therefore there may be differences between the reports;
- For those sites where the officer is of the opinion that the site needs to be taken forward as an allocation, further specialist advice will be undertaken (and noted in all relevant evidence base documents) to help justify the allocation, particularly in regard to providing more detailed explanation as to the wider benefits of the site being taken forward and the type of mitigation expected in relation to heritage should the site be developed.