

SOUTH WEST OFFICE

Mrs Linda Renshaw
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Direct Dial: 0117 975 0692

Our ref: PL00018724

13 April 2016

Dear Mrs Renshaw

Thank you for the opportunity to comment on these important documents.

Environmental assessment can play a vital part in achieving sustainable development. We published a guidance document in 2013, this can be found through this link: <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>

We advise that you review and apply this guidance, as the SA scoping could do with tightening up in its consideration of the historic environment. We are concerned that it would not be a valid and robust basis for assessing and informing the relative sustainability of the plan. The Historic England Guidance has a particular section on scoping reports. It picks up on the need for appropriate:

Relevant plans, programmes and policies:

The Historic England guidance highlights a broader range of relevant policies and programmes. Having read our guidance this should be updated.

Baseline evidence:

Historic England recommends that the baseline information describes the current and future likely state of the historic environment. This provides the basis for: identifying sustainability issues; predicting and monitoring effects; and identifying alternative solutions.

Similar to these NPPF expectations, the SEA Directive requires that sufficient information is gathered and that an adequate assessment is undertaken to understand the likely significant positive and negative effects on heritage assets.

There is an expectation that local authority demonstrates there has been a proper assessment of the significance of heritage assets affected, including their settings. This would set out what it is about specific heritage assets affected that is important and how the land/site proposed for development contributes to that significance, and



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what in turn this means for the principle of development, and any future design response. Without such an assessment the local authority cannot properly assert that the objectives for sustainable development have been understood and therefore cannot say whether the objectively assessed development needs of the area will be met or not in accordance with the presumption in favour of sustainable development.

In addition how might the LPA address the number of sites on the Historic England heritage at risk register, some of which may be directly impacted by some of the allocation sites. How might the proposals get these sites off the register and repair these heritage assets or bring them back into use, where appropriate? This would, after all, be a positive enhancement, in line with the NPPF, paragraph 126.

Strategic Objectives:

As stated in our guidance, Historic England considers that for an SEA/SA to meet the requirements of the SEA Directive to assess impacts on cultural heritage, it needs to include a specific objective and we welcome that there is one. We consider however that objective than 8 follow the wording “conserve and enhance the historic environment, heritage assets and their settings” further guidance on this, criteria and indicators is contained within our guidance. Interestingly number 10 deals with character, a substantive part of what the historic environment is contributes to character and yet there is no recognition of this in the second column?

Identifying sustainability issues and problems:

We welcome the identification of issues to consider impacts upon the historic environment. It is how these are addressed that is key.

It is important not to use the Sustainability Appraisal as a heritage impact assessment for the Village Plan. The SA is frequently far too general in approach and not undertaken by someone with the relevant expertise to consider significance or setting. The approach advocated in the Historic Environment and Site Allocations in Local Plans, Historic England Advice note 3, should be undertaken by an appropriate professionally skilled historic environment specialist.

<<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>>

Indicators and Monitoring:

The selection of indicators for the historic environment may vary at different stages of the assessment process and in relation to the particular development plan. The priority is to devise indicators which will clearly demonstrate the impact(s) of the plan on the historic environment. All proposed indicators for monitoring the significant effects of a



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plan should be set out in the Environmental / Sustainability Appraisal Report and finalised in the adopted plan.

I hope that you find the above comments useful and I would be pleased if you could keep me and informed of progress on your SEA.

Yours sincerely,

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