



Historic England

Simon Meecham
Tendring District Council
Council Offices
Thorpe Road
Weeley
Essex
CO16 9AJ

Our ref:
Your ref:
Date:

Direct Dial: 

By email only to planning.policy@tendringdc.gov.uk

Dear Mr Meecham,

Tendring Local Plan Publication Draft Consultation

Thank you for consulting Historic England on Tendring's publication draft local plan. 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 draft Plan. We have now had the opportunity to review the documents and can provide the following substantive comments.

General comments

Historic England has published a number of Good Practice Advice and Advice Notes which you may find useful in developing your local plan. In particular:

Good Practice Advice in Planning 1 - the historic environment in local plans:

[<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>](https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/)

Good Practice Advice in Planning 3 - the setting of heritage assets:

[<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>](https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/)

Advice Note 3 - site allocations in local plans: [<https://historicengland.org.uk/images-](https://historicengland.org.uk/images-)



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



[books/publications/historic-environment-and-site-allocations-in-local-plans/>.](#)

We have made some brief comments on the Sustainability Appraisal Report. Please note that Historic England have produced advice entitled HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> (01 Dec 2016)

For the avoidance of doubt, we have not considered archaeological issues in this brief, desk based assessment but would refer you to the HER held by Essex County Council who should be able to advise in this regard. We have also not identified non-designated assets.

General Comments

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

Further opportunity should be sought to address the historic environment in every aspect of the Plan and to make the strategy more spatially specific and unique to Braintree.

Specific Comments



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Section 1 – Shared Strategic Plan

Para 1.31 - Strategic Objectives

This paragraph contains objectives to support the development of the strategy for the North Essex area. It is disappointing that there remains no reference to require development to respond to the distinctive character of North Essex and that there is no reference to protecting heritage assets and the character of existing settlements. Historic England's comments on the June 2016 Draft Local Plan suggested that the Strategic Objectives could require "developments to respond to the distinctive character of North Essex as part of providing sufficient new homes and ensuring high quality outcomes." Historic England request that the Strategic Objectives be amended to include a requirement for new development to have regard to the historic environment, to reflect paragraph 7 of the NPPF (the three dimensions to sustainable development).

Policy SP2: Spatial Strategy for North Essex

The policy refers to Map 3.3 – but this is not apparent in the published documents.

Paragraph 2 of the policy refers to maintaining distinctive character and role of settlements. However, the policy does not refer to the importance of the historic built environment in North Essex. It is requested that the second paragraph is amended to ensure that reference is made to settlements maintaining their distinctive and historic character. It is also noted that the Policy no longer seeks to avoid coalescence between settlements. This is a significant change from the June 2016 draft Local Plan and has potentially serious implications for the conservation and setting of heritage assets, especially the character of conservation areas.

Historic England requests that the first sentence of paragraph 2 of the Policy is amended as follows:

"Future growth will be planned to ensure settlements maintain their distinctive character and role, and to avoid coalescence between them."

Our comments on the June 2016 draft Local Plan suggested that the supporting text should set out what the policy means for North Essex in respect of high quality of built and urban design. While the wording of the policy has been amended slightly, we remain of the view that the supporting text (paras 3.1 to 3.5) should be set out what this means for North Essex.

SP4 Infrastructure and Connectivity

We note the comments in respect of the A120 route improvements referred to in paragraphs 6.9 and 6.10 and the strategic priority for a dualled A120 between the A12 and Braintree. Highways England were invited to participate in the Highways England Environmental Forum for the A12 & A120 improvements and we reiterate that the A120 is a historic route through Essex and as such there is great archaeological potential, alongside



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

the potential impacts on heritage assets, which may vary, depending on the options developed.

Our comments on the August 2016 consultation, in respect of broadband provision, sought reference in what are now paragraphs 6.29 and 6.30, though not a hyperlink, to the *Cabinet Siting and Pole Siting Code of Practice*:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf

We reiterate that comment in respect of the pre-submission draft local plan.

Policy SP6 – Place Shaping Principles

Historic England welcomes the reference to protecting and enhancing the historic assets. Our comments on Policy SP6 of the June 2016 draft local plan suggested that the first bullet point of the policy is clarified to read: "...*enhance the quality of existing places*" rather than "communities." This bullet point has not been amended and we repeat our comment in this respect.

In relation to the principle to "enhance the public realm...through additional street furniture...." there will need to be some caution in implementing the policy as worded to guard against the unmanaged and indiscriminate use of street furniture such as signs, benches, bins etc in the historic environment. Without careful control, there can be a detrimental impact on the setting of historic buildings and the character of conservation areas.

Garden Communities

Our concerns raised in the July 2016 consultation remain. As far as we can see, there has not been a demonstrable consideration of the impact of any such policy on the historic environment. Whilst the local plan sets out that the proposed developments will follow TCPA Garden City Principles, there is no specific consideration for the historic environment within these principles. The Draft Sustainability Appraisal (SA): Environmental Report - June 2017 (page 180) acknowledges that "it can be expected that Garden Communities and New Towns will have a greater possibility of impacting on a larger number of assets due to their scale." For this reason, it is essential that the local plan should contain a framework to guide how the boundaries and extent of the garden communities are determined in the subsequent development plan documents. Historic Impact Assessments should be undertaken in accordance with our advice note 'Site allocations in Local Plans' for each of the proposed broad locations 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 significance), impacts of development upon the asset and any potential mitigation measures necessary to accompany the proposals. Appropriate criteria for the



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

protection of heritage assets and their settings need to be included in each of the policies and supporting text for the Garden Communities.

Paras 8.11 and 8.14

The first sentence of each of these paragraphs are the same.

Paras 8.2 to 8.6 – These paragraphs do not refer to the potential for detrimental impacts on heritage assets despite the statement in para 5.8 of the Sustainability Appraisal Main Report (page 49) that identifies that the garden communities option could this option could “lead to negative effects on the settings of these assets, or the assets themselves, resulting in negative effects on SA Objective 10: ‘Historic environment’.” Given the presence of heritage assets within or in the vicinity of the identified areas for garden communities it is considered that reference should be made in these paragraphs of the Plan to the need to have appropriate regard to the existence of heritage assets in the areas and the need for proposals to have no unacceptable impact on them. It is considered that the location and design of garden communities should be informed in the first place by the potential to assimilate the proposals into the landscape without unacceptable detrimental impacts on designated historic and natural assets. See our comments regarding HIA for Garden Communities above.

Policy SP7 - Development and Delivery of New Garden Communities in Essex

The policy contains nothing about how the extent of the garden communities will be determined. It states that the garden communities will deliver a certain number of homes signaling that the new settlements will be housing led rather than considering the landscape and heritage assets and delivering development that has regard to these assets and which would not allow development in certain constrained areas. As such the development plan documents for each settlement should be required, through inclusion of an additional criterion in Policy SP7, to undertake a Heritage Impact Assessment in accordance with our advice note 3 Site Allocations in Local Plans in order to assess impact of the proposed allocation upon the historic environment, to inform the appropriate extent of the development and establish any mitigation measures necessary. This might include appropriate safeguarding buffers around heritage assets such as historic parks and gardens, scheduled monuments, conservation areas and listed buildings and identify how the historic environment and heritage assets can form part of the development of successful schemes. See our comments regarding HIA for Garden Communities above.

Policy SP8 – Tendring/Colchester Borders Garden Community

The policy contains no indication as to how the extent of the garden communities will be determined. It states that the garden communities will deliver a certain number of homes signaling that the new settlements will be housing led rather than considering the landscape and heritage assets and delivering development that has regard to these assets and which would not allow development in certain constrained areas. As such the



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

development plan documents for each settlement should be required, through inclusion of an additional criterion in Policy SP8 to undertake a Heritage Impact Assessment in accordance with our advice note 3 Site Allocations in Local Plans in order to assess impact of the proposed allocation upon the historic environment, to inform the appropriate extent of the development and establish any mitigation measures necessary. This might include appropriate safeguarding buffers around heritage assets such as historic parks and gardens, scheduled monuments, conservation areas and listed buildings and identify how the historic environment and heritage assets can form part of the development of successful schemes. See our comments regarding HIA for Garden Communities above.

The site illustrated in Map 10.4A and Map 10.5 contains a number of listed buildings. The proposed garden community could have a significant detrimental impact on the setting of these heritage assets. Part F (para 20) should be strengthened and amended to include reference to the heritage assets and the need to have regard to their setting when preparing more detailed planning frameworks for the site.

Policy SP9 – Colchester / Braintree Borders Garden Community

The policy contains no indication as to how the extent of the garden communities will be determined. It states that the garden communities will deliver a certain number of homes signaling that the new settlements will be housing led rather than considering the landscape and heritage assets and delivering development that has regard to these assets and which would not allow development in certain constrained areas. As such the development plan documents for each settlement should be required, through inclusion of an additional criterion in Policy SP9, to undertake a Heritage Impact Assessment in accordance with our advice note 3 Site Allocations in Local Plans in order to assess impact of the proposed allocation upon the historic environment, to inform the appropriate extent of the development and establish any mitigation measures necessary. This might include appropriate safeguarding buffers around heritage assets such as historic parks and gardens, scheduled monuments, conservation areas and listed buildings and identify how the historic environment and heritage assets can form part of the development of successful schemes. See our comments regarding HIA for Garden Communities above.

The area identified for the garden community includes the A120, a Roman road known as Stane Street and the A12, also a Roman road. As a consequence, there is the potential for significant archaeological interests in the vicinity of these roads. In addition, there are a number of listed buildings in the area, including Grade I listed buildings at Feering and Little Tey.

Policy SP10 – West of Braintree Garden Community

The site illustrated in Map 10.2A contains a number of listed buildings including groups of listed buildings in clusters of development within the area. It also verges on the Registered



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Park and Garden at Salling Grove. The proposed garden community could have a significant detrimental impact on the setting of these heritage assets. Part F (para 20) should be strengthened and amended to include reference to the heritage assets and the need to have regard to their setting when preparing more detailed planning frameworks for the site.

The policy contains no indication as to how the extent of the garden communities will be determined. It states that the garden communities will deliver a certain number of homes signaling that the new settlements will be housing led rather than considering the landscape and heritage assets and delivering development that has regard to these assets and which would not allow development in certain constrained areas. As such the development plan documents for each settlement should be required, through inclusion of an additional criterion in Policy SP9, to define appropriate safeguarding buffers around heritage assets such as registered parks and gardens, scheduled monuments, conservation areas and listed buildings and identify how the historic environment and heritage assets can form part of the development of successful schemes.

Section 2

The incorporation of many of our comments submitted in response to the Preferred Options Draft Local Plan July 2016 are welcome and address many of our concerns about the overall balance of the Plan. Some concerns have not been addressed and the comments below will highlight and reiterate the changes to the Plan that we feel necessary to ensure that the Plan has appropriate regard to the heritage assets of the district.

As an overall comment on the draft Local Plan, it is impossible to link the allocations and designations in the Plan to the Local Maps as the latter do not contain links to relevant policies in the key and/or on the sites. For the reader unfamiliar with the area it makes it almost impossible to know which sites the Plan refers to.

Local Plan Introduction

We repeat our comment to the Preferred Options Draft Local Plan July 2016 that we are encouraged to see that the introduction to the local plan recognises that the district benefits from attractive landscapes, coastline and maritime heritage. However, we remain of the opinion that the districts diverse and distinctive historic environment should be acknowledged in paragraph 1.1.1.

2. Vision & Objectives

We welcome the amendments made to the Vision statement following our comments on the Preferred Options Draft Local Plan July 2016. However, there are some recommended amendments that we made at the time that have not been picked up. We therefore repeat those comments and ask that the Vision is amended as follows:



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.



Correspondence or information which you send us may therefore become publicly available.

- In the second paragraph of the Vision, we suggest that “tidy coast” be reviewed to better reflect Tendring’s historic natural coastline.
- Under Seaside towns, we request that there is an aspiration to preserve and enhance the special historic character of Clacton-on-Sea, particularly given the designated Clacton Seafront Conservation Area.
- In the Rural Hinterland section, we request that bullet point 3 is amended to “historic” rather than “historical”.

3. Sustainable Places

Heritage Characteristics

We note that most of our comments on this section in the Preferred Options Draft Local Plan July 2016 have been included in the Publication Plan. However, we suggest that the following amendments are made:

Para 3.1.5.2 – “Outside of these designated areas, the district’s largely rural character and long history of occupation results in many areas of high archaeological importance as well as a range of listed buildings, conservation areas and scheduled monuments.”

Para 3.1.5.3 – We reiterate our comments on the Preferred Options Draft Local Plan July 2016 in that, to avoid any later lack of clarity and any misunderstanding regarding the importance of St Osyth, the following changes to the paragraph should be made:

These include the St Osyth Prior Gatehouse (Scheduled Monument, Grade 1 listed building) an important example of monastic building of the Augustinian order ~~whose façade~~ is which has one of the best preserved examples of knapped flint and stone flushwork in ~~East Anglia~~ England.

Policy SPL3 – Sustainable Design

We support the amendment that has been made to Part A criterion d. of the policy that has replaced “incorporates” with “maintains”.

5. Living Places

Policy LP1 – Housing Supply

We note that the table preceding this policy identifies a number of local plan housing allocations. However, we can find no policy that specifically allocates some of the smaller housing sites referred to in this policy and, as previously highlighted, they are not referenced on the Policies Map. It is also unclear as to whether some of these sites already have planning consent. These sites might have the potential to impact on heritage assets



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.



either directly or due to their location within the setting of heritage assets. Without further details of these sites it is impossible to confirm whether the allocations are acceptable to Historic England.

Partly due to the difficulty in identifying allocations of the Proposals Map but also due to our own capacity constraints, we have not been able to check each and every site allocation. However, we include the following general advice re site allocations.

Assessing sites

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).

Assessment criteria

Many authorities include a distance based criteria to assess impact on the historic environment. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.

Policy LP4 – Housing Layout

We propose that criterion f should be amended as follows:

f. respect the ~~historical~~ local historic character and settlement hierarchy of Tendring District by delivering housing development at densities in keeping with the character and densities of the local area and the urban nature of parts of the District including town centres.

Policy LP6 – Rural Exception Sites

We reiterate our comments on the Preferred Options Draft Local Plan July 2016 in that, in respect of the Location and Environmental Considerations, as well as the considerations listed there should be reference to having no significant material adverse impact on the historic environment.

6. Prosperous Places

Policy PP5 – Town Centre Uses

We suggest that the current criterion g. should be a standalone sentence within the policy?

Policy PP8 – Tourism

We support the recognition that heritage can make a contribution to supporting tourism. We would additionally welcome particular emphasis of the historic environment and the wider social, cultural and economic benefit that heritage related tourism can bring.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Policy PP13 – The Rural Economy

We support the wording of criterion a. and reference to the historic environment.

Policy PP14 – Priority Areas for Regeneration

We welcome reference to the need to preserve or enhance the historic environment as well as reference to conservation areas at risk. We suggest that the term historic assets is replaced by either historic environment or heritage assets.

7. Protected Places

Policy PPL2

We welcome the changes made to policy PPL2 in respect of the historic environment.

Policy PPL3 – The Rural Landscape

We welcome the amendments that have been made to the policy since the Preferred Options consultation but would expect to see the policy or supporting text acknowledge that the historic landscape is an integral part of the character of rural parts of the district that regard should be had to when considering development proposals.

7.7 The Historic Environment

We welcome the amendments that have been made to this section of the Plan since the Preferred Options consultation. However, some concerns remain as detailed below.

We request that an appropriate policy or policies are included in the Plan that address all elements of the historic environment including a local list of undesignated heritage assets, registered parks and gardens and wider definitions of the historic environment. As such we would like to highlight that the following elements of the historic environment are not adequately addressed in the Plan and should be given specific provision within the policies.

- Non-designated heritage assets.
- Provision for the allocation and management of non-designated heritage assets through a local list.
- Heritage at Risk
- Registered Parks and Gardens

Scheduled Monuments should also be specifically mentioned in a policy.

This would help to demonstrate that the Plan is based on an overall strategy for the Historic Environment in accordance with paragraph 126 of the NPPF.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Para. 7.7.5 We reiterate our comments on the Preferred Options Draft Local Plan July 2016. We request the deletion of the words “on occasion” with reference to when contemporary approaches to design might be appropriate. However, we welcome the Council’s commitment to prepare new Conservation Area Management Plans as well as updates to the existing Conservation Area Character Appraisals.

Policy PPL8 – Conservation Areas

We support the amendments to the final paragraph of this policy to refer to demolitions in a conservation area and the need to demonstrate how the proposal would impact on the Conservation Area.

However, we consider that this policy requires amendment in order to address the designation of new conservation areas over the plan period and the preparation of conservation area management plans, appraisals or other relevant document which defines the character of individual conservation areas

Policy PPL11 – The Avenues Area of Special Character, Frinton-on-Sea

We note that this policy is conservation area specific, similar to an adopted appraisal. Provided that the character of a conservation area is defined and the definition is given statutory weight (eg: adopted), we support any format preferred by the Council. To make this section of the proposed policy clearer, we suggest that you re-order the policy so that it follows with Policy PPL8 (Conservation Areas).

Policy PPL12 – The Gardens Area of Special Character, Clacton-on-Sea

We note that this policy is conservation area specific, similar to an adopted appraisal. Provided that the character of a conservation area is defined and the definition is given statutory weight (eg: adopted), we support any format preferred by the Council. To make this section of the proposed policy clearer, we suggest that you re-order the policy so that it follows with Policy PPL8 (Conservation Areas).

Para 7.9 – Enabling Development

We are pleased to note that this policy and supporting text has been removed from the Plan. However, the heading remains and is clearly a typographical error.

9. Delivering Places

Policy SAMU1 – Development at Edme Maltings, Mistley

We support the requirement in paragraph 9.1.4 for the emphasis to be placed on high quality of design and the integration of any development with the existing character and appearance of the village.

Similarly, we support criterion i) of the Policy.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.



Policy SAMU2 – Development at Hartley Gardens, Clacton

The proposed allocation is large and, without careful design, will significantly reduce the sense of Little Clacton as a settlement separate from Clacton and will potentially have a significant impact on the landscape setting of these settlements. If fully developed, remnants of open space would likely remain as artificial buffers rather than open countryside.

There are a number of heritage assets in the vicinity of the site that proposals on this site will need to give careful consideration to. Specifically, these are:

- the Grade II listed farms or former farmhouses of Earls Hall Lodge and Duchess Farmhouse to the south and west of the site;
- the Grade II listed buildings and archaeological remains centred around Bovill's Hall to the north. These are agricultural in nature and have a setting that relates to the wider open landscape;
- the Grade II listed Bluehouse Farm south of the site, which has been surrounded by twentieth century development. It would be expected that development would respect and reflect the materials, form and setting of this heritage asset, preferably improving its appreciation and setting.

Reference should be made in the supporting text (para 9.2) to the proximity of these features and the need to take them into account in working up development proposals.

In respect of the overall development, proposals would be expected to demonstrate how they relate to the setting and significance of these listed buildings and their wider landscape context.

We propose a re-ordering and amendment to the policy as follows:

~~"k. Opportunities to preserve and enhance due regard should be given to the setting and significance of other heritage assets in the locality;~~

~~k. where an archaeological evaluation (trial trenching where necessary) identifies surviving archaeological deposits, an appropriate mitigation strategy for preservation in situ or by excavation should be submitted;"~~

Policy SAMU3 – Development at Oakwood Park, Clacton

The site is in close proximity to listed buildings including Grade II listed Oak House and Redhouse Farms to the west and the Grade II listed Sladbury's Old House, Sladbury's Cartlodge and Treasure Holt Farmhouse. These structures to the east are set a greater distance from the site allocation but are positioned across open farmland and are agricultural in origin, with a relationship to the wider landscape. Reference should be made in the supporting text (para 9.3) to the proximity of these features and the need to take them into account in working up development proposals.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.



The site also includes a bridleway across it. These routes can represent historic movement patterns in the area and can have a long history. We support criterion k. of the policy but need to be reassured that the rural character of the bridleway would not be lost because of the development to the east and west of it.

Policy SAMU4 – Development at Rouses Farm, Jaywick Lane, Clacton

The proposed allocation is large and, without careful design, will significantly reduce the sense of Jaywick as a settlement separate from Clacton and will potentially have a significant impact on the landscape setting of these settlements and result in the coalescence of the two.

The Council should be aware that a Grade II listed building, Duchess Farmhouse, is located to the north of the site, on St John's Road. Proposals on this site will therefore need to have regard to the setting of this heritage asset.

The site itself has been noted to support archaeological remains. We would expect archaeological assessment to be applied to developments within this site.

Reference should be made in the supporting text (para 9.4) to the proximity of these features and the need to take them into account in working up development proposals.

Policy SAMU5 – Development south of Thorpe Road, Weeley

We are reassured to note that the larger expansion of Weeley as proposed in the Preferred Options Draft Local Plan July 2016 have been scaled down to the allocation of this site.

In the context of the site that is allocated in SAMU5, the site includes within it the Grade II Listed Ash Farmhouse at the north-west of the site adjoining Thorpe Road. Proposals on this site will therefore need to have specific regard to the preservation and, where necessary improvement of this heritage asset and its setting

Reference should be made in the supporting text (para 9.5) to the presence of this feature on site and the need to take it into account in working up development proposals.

Policy SAH1 – Development at Greenfield Farm, Dovercourt

The Council should be aware that a Grade II listed building, Vicarage Farmhouse, is located adjacent to the south-west boundary of the site. Therefore, proposals on this site will need to have regard to the setting of this heritage asset. We require a modification to this policy to include the an additional criterion as follows:

delivery of opportunities for the protection and enhancement of the historic environment features and settings including the built and archaeological environment;



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.



Reference should also be included in the supporting paragraph to the need to protect the setting of Vicarage Farmhouse.

Policy SAE2 – Land south of Long Road, Mistley

This site is located in an open flat landscape and will be visible from some distance in many directions. There is therefore the potential for development on this site to have a detrimental impact on the landscape and heritage assets. As such, proposals on this site will need to have regard to the presence of the Grade II Listed Buildings at Mistley Hall to the north-east of the site.

We request that Policy SAE2 is amended to require proposals to have regard to the historic environment and not harm the character and setting of nearby listed buildings.

10. Delivering Infrastructure

We reiterate our request that references to Heritage England are corrected to Historic England in this section and anywhere else within the document.

Conclusion

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. Please let me know if you have any queries. We look forward to further engagement on the Local Plan review.

Yours sincerely,



Dr Natalie Gates

Principal, Historic Places Team

e-mail: [REDACTED]



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.