



Historic England

Forward Planning and Conservation
Phoenix House
Phoenix Lane
Tiverton
Devon
EX16 6PP

Our ref: HDP 5365
Your ref:

3 April 2018

Dear Sir

re: Consultation on amendments to Sustainability Appraisal

Many thanks for inviting Historic England to comment on the above amended consultation following the review of the SA earlier this year.

Please be aware of our guidance on preparing SEAs taking account of the historic environment. See the link below:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

In commenting upon this iteration we are primarily registering our concern that the evidence base or SA/SA in this instance may need to be supplemented in order to determine the harm, if any. Particularly where the Outcome on certain sites is tested set against the sustainability Objective and it records ? or - . The Council will need to be able to fully justify the site allocations and be satisfied that a positive strategy for the historic environment has been included. It is not sufficient to rely on the SA/SEA to provide the evidence as it is too general in approach in some circumstances.

We note on a number of sites that a Historic Environment Appraisal has been undertaken but have not been able to find this on the website. We recommend that a Historic Environment Appraisal/heritage impact assessment/background heritage report is produced to set out how the historic environment has been considered through the process on such sites. Specifically, it needs to assess whether there is any harm to heritage assets (designated and undesignated) through the site allocations, whether that harm can be avoided or mitigated through the Plan (for

example a site allocation policy/ design principles/change of use/ change size of allocation) or whether the harm is justified taking account of the public benefit. When preparing the Local Plan - revised Core Strategy and Site Allocations Plan, we would strongly encourage you to use our guidance:

- HEAN 3: Site Allocations note - <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- The Setting of Heritage Assets Guidance - <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

with a view to applying it to such sites. It is particularly relevant to this process and will provide you with certainty that your plan will ultimately be sound. The advice identifies a 5 step process:

- Step 1** Identify which heritage assets are affected by the site allocation
- Step 2** understand what contribution the site (in its current form) makes to the significance of the heritage asset
- Step 3** identify what impact the allocation might have on that significance
- Step 4** Consider maximising enhancements and avoiding harm
- Step 5** Determine whether the proposed site allocation is appropriate in light of the NPPFs tests of soundness.

We encourage site specific policies to be included within the Plan, where the evidence base and assessment work identify there are specific considerations/ mitigation measures that are essential to be delivered/ complimentary uses are required, as examples. This will also allow information about local distinctiveness and appropriate materials to be included, as appropriate.

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

We would also encourage you to work with local conservation and archaeology officers in the preparation of the SEA as well as on any planning policy documents. If there are any issues you wish to clarify or discuss please contact me.

Yours faithfully,

Ross Simmonds
Principal Historic Places Team