



Examination of Epping Forest Local Plan

MATTER 5 Site Selection Methodology and Viability of Site Allocations

Historic England, Hearing Statement

21 February 2019

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 5 of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Matters and Issues for Epping Forest Local Plan

MATTER 5

Site Allocations

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

1. The Council should provide a summary of the process by which the Plan's housing allocations were selected. In particular:

b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?

Section 1.8a of Appendix B1.4.1 (EB805E) sets out the assessment criteria. In respect of the historic environment, negative impacts jump from “(-) Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated” to “(--) Site would likely result in the loss of a heritage asset or result in significant impact that cannot be mitigated.” There is no assessment criterion of whether changes to the proposed allocation could be made to avoid the impact. There also is a gulf between the two negative impact criterion whereby considerable harm could be caused to significance (directly or through development within setting) which either cannot be mitigated or can only partly be mitigated.

The assessment criteria used a 1km setting for scheduled monuments, conservation areas, registered parks and gardens and grade I listed buildings. It was 500m for grade II* listed buildings and nothing for grade II and locally listed buildings. Whilst we understand the need to set an initial parameter for assessment, we would highlight that the grade of building does not necessarily correlate to the size of their setting though the report notes that, “...the setting of these assets would be smaller and less sensitive to change and thus no buffer was applied...”

We note that the larger sites will be subject to the Environmental Impact Assessment process following allocation. This places unreasonable uncertainty in the planning process as an EIA should not be identifying why an allocation is unsound unless, exceptionally, nationally significant archaeology is found where there was no indication of archaeology.

e. Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?

Heritage Impact Assessments do not form part of the evidence base for the local plan. These are essential to test the suitability of sites which potentially will have a significant impact on designated heritage assets in terms of the potential impact on the historic environment. It is important to establish the suitability of the site per se prior to allocation. If the sites are suitable, the measures to avoid harm, or mitigate

where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we would recommend inclusion of a concept diagram. This is consistent with other similar strategic site allocations across the East of England.

Please see our Matter 8 Hearing Statement for a review of the supporting evidence for the allocations SP5.1 and SP5.2. However, the same applies for SP5.3 where the assessment in EB805Fiii does note that given the scale, further assessment is required on landscape impact (including possible setting impact of registered parks and gardens and scheduled monuments), although it does not identify the settings of grade II* Sheering Hall and other grade II listed buildings which are actually within the site allocation. The mitigation proposed, reducing density and an appropriate layout, is without evidence as to whether it is appropriate and there is no evidence of avoidance of harm in the first instance. This should have been established through a heritage impact assessment, which could also explore opportunities for enhancement.