



Historic England

Examination of Epping Forest Local Plan

Written Comments on Document ED33 Harlow and Gilston Town Advice Note

Historic England, Hearing Statement

June 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 provides Historic England's brief written comments on Document ED33 Harlow and Gilston Town Advice Note.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan and our other Hearing Statements.

Comments on Document ED33 Harlow and Gilston Town Advice Note.

- 2.1 Historic England wishes to make two main points in relation to this document:
- a) The scope of the Garden City Principles as set out in paragraph 1 – lack of reference to the historic environment
 - b) The list of S106 requirements at paragraph 6.5

These issues will be considered below:

a) The scope of the Garden City Principles as set out in paragraph 1 – lack of reference to the historic environment

- 2.2 Paragraph 2.1 of document ED33 refers to the Garden City Principles. Historic England again highlight the fact that these principles make no reference to the historic environment. We raised this matter in our previous consultation responses.
- 2.3 Whilst Historic England broadly welcomes the idea of garden villages, it is important that these are carefully located and planned with respect to all three strands of sustainable development. One of the strands of sustainable development includes the protecting and enhancing the historic environment. Landscape and heritage assets should be considered from the outset when determining the location of a new settlement in order to ensure that development can be delivered whilst having regard to these assets. It is expected that strategic new settlement policies makes reference to the historic environment and the need for its conservation or enhancement.
- 2.4 Many Local Plans state that new settlements should come forward as a new 'Garden Village' based on the Town and Country Planning Association's principles for Garden Cities. It is important at this stage to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment.
- 2.5 Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that,

"locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration

of sites for new garden cities or towns should be the extent to which each one ... will allow for positive impacts on assets of historic value”.

(Emphasis added, pg 100)

- 2.6 Therefore, in drafting principles for the development of new garden communities within the Local Plan and associated documents such as this, we would suggest that reference is made to the need to conserve and enhance the historic environment.

b) The list of S106 requirements at paragraph 6.5

- 2.7 Historic England broadly welcomes the list of matters to be dealt with in the Template Section 106 agreement. It may also be helpful to include the measures for the historic environment (be they mitigation measures or enhancement measures or management measures etc.), somewhere within the list at paragraph 6.5.