



Historic England

East of England

Mr John Somers
Maldon District Council
Council Offices
Princes Road
Maldon
Essex
CM9 5DL

Our ref: HD/P5217
Your ref: None
Telephone: 01223582746

Sent via email only to john.somers@maldon.gov.uk

1st December 2015

Dear Mr Somers

Re: Sustainability Appraisal (SA) Scoping Report for Rural Allocations Development Plan Document (DPD)

Thank you for your email dated 04th November 2015 regarding the above consultation. I can advise I have taken the opportunity to review the SA Scoping Report and can offer the following.

Historic England recommends that our guidance (2013) on Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) and the Historic Environment is used to inform the environmental assessment. The guidance is available via the Historic England's website:

<https://www.historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/>

The guidance sets out a series of general principles on the consideration of the Historic Environment in the assessment process. For each stage of the assessment more detailed advice is provided to help ensure that the impact of a proposed plan/strategy on the Historic Environment is adequately addressed.

In addition to the above, Historic England have published guidance on site allocations in Local Plan. The site allocation guidance should be used to inform the Rural Allocations Development Plan Document (DPD). The guidance is available via the Historic England's website:



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

We note that a number of questions have been raised regarding the SA document and we have therefore set out our response to these questions as follows.

Question 1: Are there other relevant plans, policies and programmes and broad sustainability objectives that will affect or influence the DPD?

Yes, we recommend the inclusion of the following plans and programmes:

International/European

UNESCO World Heritage Convention (1972)

European Landscape Convention (Florence Convention)

The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)

The European Convention on the Protection of Archaeological Heritage (Valetta Convention)

National

Planning (Listed Buildings and Conservation Areas) Act 1990

Ancient Monuments and Archaeological Areas Act 1979

Local

Conservation Area Character Appraisals and Management Plans

Neighbourhood Plans

Full advice on plans and programmes can be seen on pages 5 and 6 of the Historic England SA guidance, in the link above.

Question 2: Do you agree that the baseline data collected is appropriate to the DPD?

We welcome that ‘maximising the area’s historic and cultural heritage’ is a key priority within Figure 4 on page 16. We would advise that ‘historic and cultural heritage’ is changed to the term ‘historic environment’ which is a broader topic which encompasses both tangible heritage, such as Listed Buildings and archaeology, but also the less tangible heritage, such as cultural heritage and a sense of place.

In terms of the baseline data, we welcome the section on the ‘historic environment’ and agree with the scope covered within the section. It is also considered that non-designated heritage assets, such as buildings on a Local List, and also unknown archaeology, should be acknowledged here. It would also be helpful if all designated heritage assets were mapped as this gives a good indication of the level and location of likely heritage constraints/ opportunities there are across the district.

Question 3: Do you have, or know of, any additional relevant baseline data which should be added to that already listed?

As highlighted above it is considered that both non-designated heritage assets and unknown archaeology should be highlighted within this section. The local Historic



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Environment Record (HER) should be used to gather this additional data. Designated Heritage Assets should also be mapped.

Question 4: As far as you are aware, are there any inaccuracies or anomalies in the data presented?

No comment.

Question 5: Do you agree that the issues presented in Table 4.6 are the key sustainability issues for Maldon?

We welcome the columns covering the historic environment as a key issue and agree with the bullets covered.

Question 6: Are you aware of any issues which, in your opinion, should be added or any that should be removed?

As with the baseline information it is considered that both non-designated heritage assets and unknown archaeology should be covered within the 'key issues / problems' column. We also welcome the opportunities raised within the 'opportunities / implications' column but do consider there are many other opportunities relating to the historic environment which should be explored. Additional examples of opportunities for the historic environment can be seen on page 9 of the Historic England SA guidance, in the link above.

It is considered that the historic environment issues / opportunities should also be covered within the summary section at point 4.6.3 on page 45.

Question 7: Are the proposed SA Objectives suitable in the context of Maldon?

Yes, we welcome the inclusion of the SA objective 7 relating to the historic environment. It is considered that this objective should be re-worded to 'Historic Environment: conserve and enhance historic environment, heritage assets and their setting' for clarity and consistency.

Turning to the potential conflicts outlined on page 48, we agree that there can be potential conflicts with other SA objectives such as energy use and employment provision and that these should be acknowledged. However, it should be also acknowledged that a well-managed historic environment can provide opportunities for these other SA objectives. For example, a district can secure employment provision through heritage tourist sites or historic city/town cores which provide a bespoke retail offer.

Question 8: Are there any additional SA Objectives that should be included? Should any be removed?

No comment.

Question 9: Do the indicators provide relevant measures for the associated objective? If not, please suggest additional indicators.

Yes, it is considered that the indicators relating to the historic environment provide relevant measures for the associated objective. It is, however, considered that there many other indicators relating to the historic environment which should be explored. Additional examples of indicators for the historic environment can be seen on page 11 of the Historic England SA guidance, in the link above.



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Question 10: Do you have any comments on the suggested targets, or can you propose any refinements?

I can advise we have no comments on the proposed assessment process and we look forward to being consulted on the outcomes. We would also encourage you to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal.

I hope the above has been helpful. We look forward to be consulted on the full report.

For information and for further policy consultation please note our new consultation email address for the East of England, eastplanningpolicy@HistoricEngland.org.uk.

If you would like any clarification or would like to discuss the above please do not hesitate to contact me on my direct dial 01223 582746 or email me at kayleigh.wood@HistoricEngland.org.uk.

Yours sincerely,

A handwritten signature in black ink that reads "Kayleigh Wood". The signature is written in a cursive style with a long horizontal stroke extending to the right from the end of the name.

Kayleigh Wood
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