



Historic England

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Mr Adrian Tofts
Maldon District Council
Princes Road
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Essex
CM9 5DL



20 October 2016

Dear Mr Tofts

Maldon District Local Plan Consultation

Thank you for consulting Historic England on the following documents:

- *Implications of the DCLG 2014 - Based Household Projections for the Objectively Assessed Housing Needs of Maldon District*
- *Proposed Main Modifications to the Maldon District Local Development Plan (Pre-Submission LDP)*
- *Sustainability Appraisal Report Update*

As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

Implications of the DCLG 2014 - Based Household Projections for the Objectively Assessed Housing Needs of Maldon District

We note that the latest projection of Objectively Assessed Housing Need has been reduced to 260 homes a year but that the 310 homes a year figure previously relied on is confirmed as appropriate to retain to accommodate projected overspill population growth from London. As a result there is no effective change resulting from the update and we have no comment to make on the revised projection.

Proposed Main Modifications to the Maldon District Local Development Plan (Pre-Submission LDP)

We understand that there have been a number of modifications to the LDP following Examination in Public which are presented in the consultation document. Our comments reflect our earlier response (as English Heritage) to you on the Proposed Submission Document dated 12 March 2014.



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Policy S2: Strategic Growth

We note that the target number for new homes across the district has been increased to meet the latest projection in the Objectively Assessed Housing Needs of Maldon District Document.

We note that the Reserve Sites have been removed from Policy S2: Strategic Growth including Reserve Site RE1: West of Maldon (Hall Farm), the inclusion of which caused us to raise concerns in our earlier responses.

Policy S3: Place Shaping

We note the modifications to Policy S3: Place Shaping. We have no objection provided that there are no changes to that part of the policy that recognises the role of the historic environment in providing a sense of place and identity.

Policy S4: Maldon and Heybridge Strategic Growth

We are pleased to note that the 11th bullet point has been amended to require development proposals be accompanied by a comprehensive and detailed archaeological assessment as requested in our previous comments.

We are similarly pleased to note that the likelihood of archaeological deposits in the vicinity of the Park Drive Allocation Site and the need for archaeological assessment has been incorporated into the text of the policy.

Policy S6: Burnham-on-Crouch Strategic Growth

In contrast to the above policy we are disappointed to note that our previous advice for the need to include archaeological assessment has not been incorporated into the text of the policy. Archaeological deposits have been recovered in the area ranging from Bronze Age finds through to Medieval artefacts. We continue to recommend that the following text is incorporated into Policy S6 to ensure that developers submit appropriate archaeological assessment with an application, as set out in Paragraph 128 of the NPPF.

Development proposals must be accompanied by a comprehensive and detailed archaeological assessment.

Insertion of text at Paragraph 4.40

We note the proposed additional wording where it sets out the following with regard to tourism related development;





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The priority is to avoid impact on the natural and historic environment if possible, followed by mitigation and lastly compensation.

We understand that the Council seeks to communicate the hierarchy of dealing with the conservation of the natural environment through this wording. The historic environment is a finite resource however and this is not an appropriate approach for the conservation of the historic environment. As written, the policy appears to allow for mitigation and compensation and we request a more robust approach to Conservation.

We therefore request the following amendment:

The priority is to avoid impact on the natural and historic environment ~~if possible, followed by mitigation and lastly compensation.~~

Sustainability Appraisal Report Update

Thank you for requesting comment on Revision 11/Final of the Maldon District Council Local Plan.

We welcome the retention of the SA Objective 6: *To protect and enhance the local townscape, heritage assets and their settings.* To reflect our change of name in 2015, please amend 'English Heritage' to 'Historic England' within the fourth Key Indicator within that objective.

We would welcome acknowledgement of the contribution made by non-designated assets and more intangible cultural heritage. This understandably presents challenges for measurement although the number of locally listed buildings listed during the plan period is being used by many authorities as a key indicator and we would welcome this inclusion.

We continue to note that the Sustainability Appraisal includes Figure 3: Cultural Heritage Sites and recommend that reference to this map, and later designations, continues to inform decisions regarding site allocation and growth within the district.

Summary

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.

If you have any questions with regards to the comments made then please do get



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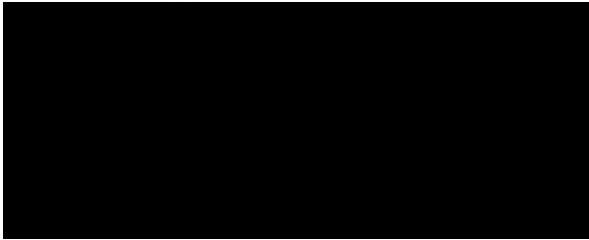


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back to me. In the meantime, we look forward to continuing to work with you in forming a positive strategy for conservation and enjoyment of the historic environment across Maldon District.

Yours sincerely,



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