



Historic England

Examination of Harlow Local Plan

Matter 4: Strategic Housing Site East of Harlow

Historic England, Hearing Statement

March 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 4: Strategic Housing Site East of Harlow of the Harlow 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 Harlow Local Plan

Issues

Matter 4: Strategic Housing Site East of Harlow

4.8 Have the historic heritage and ecological impacts of the proposal been adequately assessed, including any recreational or air quality effects on the Epping Forest SAC? Are there any implications for the content of the development or its layout?

- 2.1 It is Historic England's view that the heritage impacts of the proposed allocation have not been adequately assessed.
- 2.2 There are a number of heritage assets adjacent to, or surrounded by or close to this strategic site allocation. These include a number of listed buildings (House 20m NW of Stephen's Cottages, Hatches, Thatched Cottages, Spiers Farm, Pump, Franklins Farmhouse, Hubbard's Hall and range of two service buildings and two barns at Sheering Hall all listed at grade II as well as Sheering Hall itself to the north of the site which is listed at grade II*).
- 2.3 We note that in the Harlow Strategic Sites Assessment AECOM report, the site scores red in terms of the historic environment. Given this sensitivity, as part of the evidence base for the Local Plan, for a site of this size with nearby heritage interest, Historic England recommended that a Heritage Impact Assessment be undertaken prior to allocation to assess the suitability of the site for allocation. Without such evidence in place, the policy is not justified and is not in accordance with the NPPF. We advised that this needed to be prepared in advance of the EiP to inform the extent and capacity of the site and invited the Council to contact us to discuss the nature and extent of the work required to inform the Local Plan. We also referred the Council to our advice notes on site allocation.
- 2.4 Given the strategic cross boundary nature of this site, we provided the same advice to the neighbouring authority, Epping Forest.
- 2.5 However, to our knowledge, and having looked at the evidence base and examination documents for the Plan, no such heritage impact assessment has been undertaken. This is disappointing given our previous clear advice to the local authority. As far as we are aware, 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 allocation 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.

- 2.6 As currently worded the policy includes no protection for the historic environment. Therefore, this does not comply with the NPPF. We would also suggest the addition of a bullet point to provide protection to the historic environment. This might read, 'Conserve and where appropriate enhance the historic environment including (list key heritage assets) and their settings through careful design, landscaping heritage buffer zones'. We would also recommend the inclusion of a concept diagram to graphically portray the principles and requirements of the policy. We find this a helpful approach as a picture tells a thousand words.
- 2.7 We note reference in the policy to the Design Charter (criterion a). However, this document was only finalised in November 2018. Whilst this document does include some reference to the historic environment in relation to land east of Harlow (including mention of the Conservation Area and the need for a buffer around Hubbard's Hall there is no reference in the document to Sheering Hall grade II* to the north of the site allocation, nor to a number of other grade II listed buildings within the site itself. It is also unclear what evidence was used to formulate the criteria in the design charter in the absence of a heritage impact assessment. 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.
- 2.8 Finally, it should be noted that the AECOM Assessment of strategic sites summarised Historic England's consultation response in relation to the site but omitted our scoring of the site as unfavourable (3). Instead, the AECOM report added to our response and concluded that, 'It is likely that impacts can be avoided/mitigated'. It is our view that the AECOM report therefore did not fully reflect our response in relation to heritage at this site.