



ENGLISH HERITAGE

EAST OF ENGLAND

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By email only

27 February 2015

Dear Ms Chase

Colchester Local Plan: Issues and Options Consultation and Sustainability Appraisal Report

Thank you for your letter dated 20 January consulting English Heritage on the above documents. Colchester Borough has a rich historic environment and the new Local Plan will be an important factor in its conservation and enhancement.

We would like to make the following comments on a number of sections in the Issues and Options consultation document:

Introduction

Q2: Do you agree with the scope of the evidence base?

It is useful to see the Historic Characterisation Study in the evidence base list, along with an update (proposed or completed?) to the Landscape and Townscape Character Assessments. There will be other evidence base documents relevant to the historic environment, including conservation area appraisals and management plans. We hope that a full analysis of existing and potential historic environment evidence base sources has been or will be carried out.

Overarching Local Plan Issues

Q4: Strategic cross-boundary issues

Given that the three main growth options (see below) involve cross-boundary development, the duty to cooperate will be key. English Heritage (Historic England after 1st April 2015) is subject to the duty as a public body. As there are a number of heritage assets affected by the cross-boundary options (e.g. Wivenhoe Park to the east of Colchester), we would expect to be involved in relevant discussions as appropriate.

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Local Plan Vision

Q6: What do you think should be included in the Local Plan vision?

The Core Strategy vision makes some reference to the historic environment, but it should be improved. The first paragraph relating to Colchester itself does not convey the importance of the town's historic environment and the need to conserve and enhance its rich and varied heritage assets. The third paragraph refers to protecting the historic character and distinctive of the key district settlements and other villages, but there is no reference to the historic environment across the Borough within the wider countryside. The fourth paragraph largely refers to the natural and rural environment, and the reference to 'cultural value' does not equate to the historic environment.

Housing

Q8: Have the correct housing issues been identified?

The consultation document suggests a marked increase in annual housing delivery from 830 homes in the Core Strategy to potential 1,065 homes per year. We do not have a view on the exact figure, but the impact on the historic environment will be important. Allocation of new housing sites in the most sustainable locations and getting the right densities and character appropriate to the Borough's diverse neighbourhoods (as suggested by Issues J and K) seems logical providing that this approach properly considers the historic environment. It will require a careful and detailed analysis of locations to ensure that distribution of housing is appropriate. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets. We hope that through the Strategic Housing Land Availability Assessment (SHLAA) and Sustainability Appraisal (SA) processes that heritage impacts are properly considered when assessing sites.

With regards to site selection methodologies for housing and other allocations, care should be taken to avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable.

The following broad steps might be of assistance in terms of selecting sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

We would be happy to advise further on the above.

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Centres and Employment

Q11: Have the correct employment, retail and tourism issues been identified?

The historic environment is an important part of the Borough's employment, retail and tourism sectors, contributing to attractive places that people want to visit, work and shop. The Local Plan should ensure that new employment, retail and tourism related site allocations are sustainably located and avoid harm to heritage assets (see above comments on housing).

The town centre incorporates a very important historic environment with many heritage assets. Efforts to retain and enhance the vitality and viability of the town centre should therefore be linked to the conservation and enhancement of its historic environment. The same issues apply to other retail centres in the Borough where the historic environment is a key component. In 2013, we published a review of retail and town centre issues in historic areas, which may contain a number of relevant recommendations and case studies for this plan. The review can be downloaded from our website at: <http://www.english-heritage.org.uk/professional/advice/advice-by-topic/heritage-and-growth/changing-face-high-street/>.

Rural Colchester

Q14: Have the correct rural issues been identified?

The historic environment is an important part of the Borough's rural hinterland, with smaller towns, villages and the wider countryside. There are many heritage assets located within this area, and policies should ensure their conservation and enhancement.

Sustainable Transport and Accessibility

Q20: Have the correct transport issues been identified?

We note the capacity issues with the A120 and A12 from Marks Tey around the north side of Colchester. We have responded separately to the Highways Agency's Route Based Strategy for the East of England, in which we have highlighted the proximity of several listed buildings along the stretch of the strategic road network. Any improvement proposals would need to address potential impacts on these and other heritage assets.

Historic Environment

Q23: Have the correct historic environment issues been identified or are there any missing?

English Heritage welcomes the focus on the historic environment within this section of the consultation document. We agree that richness of Colchester's heritage is reflected in the number of designated heritage assets and the number of non-designated heritage assets including archaeology and locally important assets. We welcome the fact that the Council has adopted a local list. We recognise that safeguarding and improving the quality of Colchester's historic environment relies on sustaining and reinvigorating heritage assets, and can involve sympathetic new uses, buildings and/or alterations. This broadly follows our Constructive Conservation

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approach and our underlying Conservation Principles (see <http://www.english-heritage.org.uk/professional/advice/conservation-principles/ConservationPrinciples/>).

We agree that there is increased awareness of the importance of indirect impacts of development on the setting of heritage assets, while investment in public spaces and townscape is vital. The three issues identified in (jj) to (ll) are all correct.

The consultation document misses out the issue of heritage at risk, which is an increasingly important focus for heritage policy and management. It would be appropriate for this section of the document to acknowledge those assets on the Heritage at Risk Register published annually by English Heritage. The 2014 register include the following:

- Ruins of the Church of St Mary, Birch (Scheduled Monument and Grade II*)
- The Water Tower 'Jumbo', Colchester (Grade II*)
- Church of St Peter, North Hill, Colchester (Grade II*)
- Church of St Botolph, Colchester (Scheduled Monument and Grade II)
- Pitchbury Ramparts hillfort, Great Horkesley (Scheduled Monument)
- Roman Villa 450m south of Warren's Farm, Great Tey (Scheduled Monument)
- Remains of the Church of St Mary the Virgin, Virley (Scheduled Monument and Grade II)
- Conservation Areas at Birch, Distillery Pond and Hythe.

The document also misses the issue of minor, incremental change within the historic environment and its potential impact on the significance of heritage assets. Within conservation areas for example, permitted development rights can result in the loss or alteration of original features to the detriment of the overall heritage asset. The issue of climate change adaption is also relevant in terms of how heritage assets may be modified without causing harm to their significance.

Q24: Do you have any thoughts on how the Plan could or should address these issues?

Paragraph 126 of the National Planning Policy Framework states that: "local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment". The NPPF also states that local plans should include strategic policies to deliver the protection and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157).

The Local Plan as a whole should be able to demonstrate that it sets out a positive strategy for the historic environment. This means that, on balance, the Local Plan has a positive effect on the historic environment and heritage assets. Different sections of the Local Plan should form part of the overall positive strategy, such as proposals for housing, regeneration, town centres or employment development. Policies throughout the Local Plan should help deliver the conservation of the historic environment with appropriate references where necessary. At the same time, a specific historic environment policy is encouraged as it helps to emphasise and implement the "positive strategy" required by the NPPF.

We agree with the development of policies to support specific methods of delivering high quality design, but would also advocate policies that set out the Council's

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approach to the overall management of the historic environment, in terms of both designated and non-designated heritage assets (including archaeology). Consideration should be given in the emerging Local Plan as to whether it is appropriate to propose any policies specific to addressing the matter of Heritage at Risk, either collectively or targeted at specific assets on the at risk list. We would also ask that an appropriate policy approach is included in the plan to afford an appropriate level of protection to those assets on the Local List, especially where the asset is located outside of a Conservation Area.

We have attached a copy of our draft Good Practice Advice Note on the historic environment in Local Plans, which has been subject to public consultation in 2014 and should be published in its final form later this year (see: <http://www.english-heritage.org.uk/publications/guidelines-and-standards/consultations/>). We hope this is of assistance when drafting the next iteration of this plan. We would also be happy to discuss the Council's approach to the historic environment in the Local Plan.

Q25: Do you have any further comments to make on design and heritage related issues?

We consider that the consultation document under-represents scheduled monuments, since the Borough contains a number of very significant scheduled monuments over and above those at Gosbecks and around the Iron Age dyke system (for example a number of important monuments within Colchester town centre). The Sustainability Appraisal identifies 52 scheduled monuments in the Borough, although our Heritage Counts data records 45 entries (<http://hc.english-heritage.org.uk/indicator-data/>). The SA explains there may be discrepancies in the counting of individual monuments, as one entry could cover two separate monuments.

It should also be noted that the SA states there are 2,560 listed buildings in the Borough but the consultation document states 2,056. Our Heritage Counts data only records 1,560 listed buildings entries, so there is some discrepancy. Again the SA notes that a single entry can include more than one listed building, such as a block of flats or terraced housing.

Natural Environment

Q26: Have the correct natural environment issues been identified?

We welcome the recognition in issue (nn) that green infrastructure includes heritage sites and is not just relevant to biodiversity, access and recreation. We hope that the policy approach to green infrastructure includes reference to heritage issues. In terms of landscape character, the historic environment is an important component from buildings and settlements to archaeology and land use. The Dedham Vale AONB has considerable cultural heritage value, with a large number of designated heritage assets and non-designated assets.

Growth Options / Development Strategy

Q29: Which growth option do you think would form the most appropriate strategy for the growth of the Borough and why?

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We do not have a preference for any growth option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of the Borough's many heritage assets. We have only been able to carry out a rapid desk-based assessment of the different growth options and have not had the opportunity to ascertain precise impacts. We have focussed on those locations with the potential for the greatest historic environment impact. This does not mean there are no issues with any other location. We reserve our final position on specific locations and sites until more information and detail is available.

Please also note that we have not considered areas of archaeological interest beyond scheduled monuments in most cases, nor have we looked at historic landscape issues beyond registered historic parks & gardens. However, wider archaeological and landscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could cause significant harm to the historic landscape. Advice from conservation and archaeological staff at borough and county levels should be sought, along with consultation of the Essex Historic Environment Record for specific heritage assets.

We note that three Growth Strategy Options are included in the document and there are common themes running through the options. Each option includes a variant relating to rural growth across the Borough's villages.

All options proposed proportionate settlement growth for Colchester, Tiptree Wivenhoe and West Mersea. Options 1 and 2 include a new settlement to the west that would cross over into Braintree District. Options 1 and 3 propose a new settlement to the east that would cross over into Tendring District, and option 3 also includes a new urban extension to the north of Colchester. All these proposals are likely to have some implications for the historic environment, but due to the outline nature of the proposals it is difficult to fully assess that impact. However, we would like to make the following observations on the different components of each option:

- **Proportional Settlement Growth**

No information is included on possible sites for settlement growth of Colchester, Tiptree, Wivenhoe and West Mersea. All these settlements include heritage assets and have other heritage assets nearby. However, with careful selection of sites (see above regarding methodology), English Heritage accepts that all these settlements have the potential for growth without resulting in unacceptable harm to the historic environment. Furthermore, proportional rural growth across the Borough's villages (the variant to each main option) could be possible with the careful selection of sites.

- **New Settlement to the West of Colchester**

The broad area indicated for this new settlement includes a number of grade II listed buildings, most of which are farmhouses or barns, reflecting the farming traditions of the area. A new settlement is likely to have implications for the settings of these heritage assets which are likely to change from agrarian to suburban/urban and it will be necessary to weigh any resulting harm against the wider public benefits of addressing housing need. There are a number of highly graded heritage assets to the west of the indicative area for the new settlement (including the Scheduled

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Monument and Grade I listed remains at Coggeshall Abbey and the Grade II* listed Feeringbury Manor, as well as the conservation area in Coggeshall itself). In determining the boundaries of any new settlement it would be particularly important to provide adequate buffering to ensure the settings of these important heritage assets are adequately protected. The presence of two Roman roads (A12 and A120) also indicates that detailed consideration will need to be given to the archaeological potential of the area.

- **New Settlement to the East of Colchester**

The broad area indicated for this new settlement appears to lie immediately north of the A133 (Clacton Road) but may impact on the significance of Wivenhoe Park (a Grade II registered park and garden which contains Wivenhoe House, a Grade II* listed building) located immediately south of the A133 through change within its setting. This is an important consideration and requires further assessment. Development to the south of the A133 could be particularly problematic given the historic park and garden. The Sustainability Appraisal identifies this as a particular issue. The close proximity of this site to Colchester means the archaeological potential of the area would need to be carefully assessed. We have commented on this location as part of our engagement in the Tendring Local Plan in February 2014.

- **Urban Extension to the North of Colchester**

Depending on the size and exact location, an urban extension north of the A12 is likely to on the setting of a number of Grade II listed buildings. Most are vernacular structures that reflect the agricultural traditions of the area, but it is likely to also include Langham Lodge, a former 'E' plan house that dates from the 16th century and is listed at Grade II.

Q32: Should we look to have high densities and where do you think higher densities would be appropriate?

Any decision regarding higher densities should be informed by an analysis of the likely historic environment impacts for any given location. Higher densities may be possible in locations containing heritage assets, but this would need to be justified and avoid undue harm to the significance and setting of specific assets.

Sustainability Appraisal Report

We would like to make the following comments on the Sustainability Appraisal Report:

Baseline Data

We welcome the thorough overview of the Borough's historic environment on pages 35 onwards and note the qualification regarding the number of heritage assets within the Borough following our comments on the Scoping Report.

Sustainability Appraisal Framework

We welcome the amendments to the historic environment objective following our comments on the Scoping Report. However, as commented previously, the indicators (and baseline data in Appendix 2) should refer to all categories of heritage at risk, not just buildings (i.e. conservation areas, scheduled monuments and registered parks and gardens), while some clarification on what is meant by "new"

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conservation area appraisals adopted would be helpful (i.e. what is the timeframe for “new”?).

Initial Appraisal of Growth Options

The initial appraisal of growth options seems to underplay the potential impact on the historic environment (SA Objective 7). Options 1A/1B and 3A/3B are shown as either neutral or minor negative, with Option 2A/2B shown as neutral. This suggests that growth to the west of Colchester would have a neutral effect on the historic environment, which underplays the number of listed buildings and other heritage assets along the A120 corridor towards Coggeshall. It also suggests that growth to the north of Colchester would have a neutral effect, despite the proximity of listed buildings and the uncertainty over precise boundaries. It would appear that only growth to the east of Colchester is considered to potentially have a negative effect due to the location of Wivenhoe Park and several listed buildings. We disagree with the final column which suggests that negative impacts on heritage assets would be removed from Options 1A/1B and 3A/3B if development avoiding land to the south of the A133 for the reasons expressed above. Furthermore, we consider that the impact could be more than minor negative if development took place to the south of the A133.

It is unfortunate that the SA does not include an initial approach of proportional settlement growth. While we appreciate there are no specific sites as yet, it is still possible to consider the potential impact of development on settlements, particularly smaller ones where locations are limited. The historic environment of each settlement forms an important consideration when considering individual settlements and specific sites (see above for comments on methodology).

We hope that the above comments are of assistance. We would be happy to discuss the emerging Local Plan in more detail in terms of how it relates to the historic environment.

Yours sincerely



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