

## F3J Council's response to Q85 heritage – July 2020

### Inspectors' Question 85

How has the Council considered the effect of the planned growth on the significance of heritage assets and their settings, within or in the vicinity of development sites proposed to be allocated within the Plan?

## 1. Overview Approach in Identifying Impacts on Heritage Assets

- 1.1 The significance of heritage assets and their settings have been central to the evaluation of site selection and the evolution of Brentwood's growth strategy. BBC approach this in a number of ways:
  - a. An internal review of significant heritage assets by the Council's Heritage Officer
  - b. Through the Sustainability Appraisal (SA), which defined heritage as one of the key objectives in the methodological assessment framework
  - c. Through further considerations during the development of the Housing and Economic Land Availability Assessment (HELAA)
  - d. Through policy, ensuring that development sites which may have an impact, are assessed as part of any development proposals.
- 1.2 In so doing, the BBC Local Plan ensured a positive strategy for conservation and enjoyment of the historical environment could be maintained and enhanced, in line with the NPPF para 184-185.
- 1.3 The following sections elaborate on the key considerations that were taken into account for allocation of sites.

## 2. Council's Heritage Officer observations

- 2.1 Part of the work that informed the preparation of the Local Plan Preferred Site Allocations 2018 included seeking views from the Council's Heritage Officer on the possible impacts to heritage assets as a result of the potential site allocations. Whilst not formally published these views did provide consideration of the historic environment for the site allocations. The table below sets out the observations of the Council's Heritage Officer on the sites under consideration for potential allocation and inclusion in the Preferred Site Allocations 2018.

2.2 The development sites identified in the Preferred Site Allocations 2018 included the identification of any heritage assets that would need to be considered. These were further refined in the publication of the Pre-Submission Local Plan (January 2019) whereby the site allocation policies stipulated the necessary actions in relation to identified heritage assets.

**Table 1 – Council’s Heritage Officer observations**

Site	Observations
Land rear of The Bull PH, Brook St, Brentwood (Ref: 004)	SENSITIVE. SV Name: 17, 19 and 21 Brook Street SMR Number: 27292 Type of record: Listed Building Early C16 and C18 timber framed house, now three cottages. Name: The Bull Inn SMR Number: 27294 Type of record: Listed Building Summary: Timber framed public house c.1600 and c.1900.
Land at Hunter House, Western Road (Ref: 041)	Conservation Area. Name: Brentwood SMR Number: 525 Type of record: Monument Grid Reference: TQ 594 937 Map Sheet: TQ59SE Parish: BRENTWOOD, BRENTWOOD, ESSEX Summary: Medieval town. Conservation Area
Eagle and Child Pub, Shenfield (Ref: 324)	ECC Archaeology refer
Chatham Way / Crown Street Car Park (Ref: 040)	Conservation Area & ECC Archaeology refer
Westbury Road Car Park (Ref: 039)	Adjacent to LB/ Conservation Area Boundary/ ECC Archaeology refer
Land at Crescent Drive, Shenfield (Ref: 186)	REFER TO ECC ON RECORDINGS - Name: Brentwood Community Hospital formerly the Brentwood District Hospital SMR Number: 15635 Type of record: Industrial Grid Reference: TQ 604 940

Site	Observations
Baytree Centre (Ref: 100)	<p>SAM - SENSITIVE - Chapel of St Thomas a Becket</p> <p>SMR Number: 528</p> <p>Type of record: Monument</p> <p>Grid Reference: TQ 594 937</p> <p>Map Sheet: TQ59SE</p> <p>Parish: BRENTWOOD, BRENTWOOD, ESSEX</p> <p>CONSERVATION AREA</p>
Wates Way Industrial Estate (Ref: 003)	<p>RECORD ECC REFER Name: Victoria Iron Works</p> <p>SMR Number: 15311</p> <p>Type of record: Industrial</p> <p>Grid Reference: TQ 595 941</p> <p>Map Sheet: TQ59SE</p> <p>Parish: BRENTWOOD, BRENTWOOD, ESSEX</p> <p>ARCHAEOLOGICAL POTENTIAL: Slight: The principal foundry buildings have been demolished.</p> <p>SITE SIGNIFICANCE: The surviving buildings are of low importance.</p> <p>MANAGEMENT: Recorded at RCHME level I. No further recording necessary</p>
Council Depot, Warley (Ref: 081)	<p>REFER ECC Name: Warley Common</p> <p>SMR Number: 19114</p> <p>Type of record: Monument</p> <p>Grid Reference: TQ 594 921</p> <p>Map Sheet: TQ59SE</p> <p>Parish: BRENTWOOD, BRENTWOOD, ESSEX</p> <p>Name: Thorndon Park</p> <p>SMR Number: 8551</p> <p>Type of record: Monument</p> <p>Grid Reference: TQ 619 908</p> <p>Map Sheet: TQ69SW</p> <p>Parish: HERONGATE AND INGRAVE, BRENTWOOD, ESSEX</p> <p>WEST HORNDON, BRENTWOOD, ESSEX</p> <p>BRENTWOOD, BRENTWOOD, ESSEX</p>
Ford Headquarters, Warley (Ref: 117A & 117B)	<p>Name: Blenheim House, Headquarters of the Royal Anglian Regiment</p> <p>SMR Number: 27308</p> <p>Type of record: Listed Building</p> <p>Grid Reference: TQ 592 915</p>

Site	Observations
	<p>Map Sheet: TQ59SE  Parish: BRENTWOOD, BRENTWOOD, ESSEX  Monument Types  MILITARY CHAPEL (C19, Post Medieval - 1800 AD to 1899 AD)  Protected Status  Historic Environment Character Area: Thames Gateway 113  Listed Building (EH) (II) 1197197: CHAPEL OF THE ESSEX REGIMENT  Name: Warley Common  SMR Number: 19114  Type of record: Monument  Grid Reference: TQ 594 921  Map Sheet: TQ59SE  Parish: BRENTWOOD, BRENTWOOD, ESSEX  Name: Warley Barracks  SMR Number: 19111  Type of record: Monument  Grid Reference: TQ 592 915  Map Sheet: TQ59SE  Parish: BRENTWOOD, BRENTWOOD, ESSEX</p>
Brentwood railway station car park (Ref: 002)	<p>REFER TO ECC 1. Brickworks site has now been developed and no archaeological remains are expected to survive  REFER TO ECC  Name: Wharf Road, Brentwood  SMR Number: 17776  Summary  An evaluation by trenching did not identify any pre-modern features.</p>
Essex County Fire Brigade HQ (Ref: 005)	No comment
William Hunter Way (Ref: 102)	<p>CONSERVATION AREA ZONE SMR Number: 525  Type of record: Monument  Grid Reference: TQ 594 937  Map Sheet: TQ59SE  Parish: BRENTWOOD, BRENTWOOD, ESSEX</p>
Land at Priests Lane (Refs: 044 & 178)	No comments

Site	Observations
West Horndon Industrial Estate (Ref: 020)	No comments
West Horndon Industrial Estate (Refs: 021 & 152)	No comments
Sow and Grow, Ongar Road, Pilgrims Hatch (Ref: 010)	<p>SENSITIVE within context of WEALD PARK List Entry Summary</p> <p>This garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by English Heritage for its special historic interest.</p> <p>Name: WEALD PARK.</p>
Land adj to Carmel, Mascalls Ln (Ref: 027)	No comment
Land west of Warley Hill (Ref: 083)	<p>Adjacent to Warley Common</p> <p>Name: Warley Common</p> <p>SMR Number: 19114</p> <p>Type of record: Monument</p> <p>Grid Reference: TQ 594 921</p> <p>Map Sheet: TQ59SE</p> <p>Parish: BRENTWOOD, BRENTWOOD, ESSEX</p> <p>Listed Buildings/Non designated Has</p>
Land East of Nags Head Lane, Brentwood (Ref: 032)	<p>SENSITIVE Name: Hou Hatch House, probably C17, early C19 and 1903.</p> <p>Full description: House, probably C17, early C19 and 1903.</p> <p>Name: Nags Head Inn</p> <p>SMR Number: 27293</p> <p>Type of record: Listed Building Summary</p> <p>C17 and later public house.</p> <p>Name: Roman road</p> <p>SMR Number: 565</p> <p>Type of record: Monument</p> <p>Grid Reference: TQ 569 925</p> <p>Map Sheet: TQ59SE</p> <p>Parish: GREATER LONDON</p> <p>BRENTWOOD, BRENTWOOD, ESSEX LB</p>

Site	Observations
Land at Honeypot Lane (Ref: 022)	REFER ECC ARCHName: Spigot Mortar Emplacement (destroyed), Honeypot Lane, Brentwood SMR Number: 20241 Type of record: Monument Grid Reference: TQ 583 936 Map Sheet: TQ59SE Parish: BRENTWOOD, BRENTWOOD, ESSEX Summary: Spigot Mortar Emplacement (destroyed)
Land off Doddinghurst Road (Ref: 023)	REQUIRES SV - ECC ARCH Name: Bishops Hall SMR Number: 46494 Type of record: Monument Grid Reference: TQ 587 952 Map Sheet: TQ59NE Parish: BRENTWOOD, BRENTWOOD, ESSEX Name: St. Kildas Rd. Brentwood SMR Number: 15234 Type of record: Monument Grid Reference: TQ 590 948 Map Sheet: TQ59SE Parish: BRENTWOOD, BRENTWOOD, ESSEX Summary: Site of Boundary marker Full description: Depicted on the 1st Ed OS map of 1885, no longer extant
Land east of Chelmsford Rd, Shenfield (Ref: 263)	No comment
Officer's Meadow (Refs: 034, 087, 235, 276)	REFER ECC ARCH Summary A bomb crater appearing as a cropmark
Land North of A1023 Chelmsford Road, Shenfield (Ref: 158)	Refer to ECC ARCH Course of Roman road leading between the 2 above NGRs.
41 Shenfield Road, Shenfield (Ref: 340)	GV II listed buildings within immediate context of site.
Land to the East of Hutton Village, Hutton, Shenfield (Ref: 219)	CONSERVATION AREA Name: Hutton Village SMR Number: 19120 Type of record: Monument Grid Reference: TQ 631 948 Map Sheet: TQ69SW

Site	Observations
	Parish: BRENTWOOD, BRENTWOOD, ESSEX Summary: Medieval and post-medieval historic village of Hutton Name: Possible Green at Hutton SMR Number: 19123 Type of record: Monument Grid Reference: TQ 635 945 Map Sheet: TQ69SW Parish: BRENTWOOD, BRENTWOOD, ESSEX
Land at Bayleys Mead (Ref: 030)	ECC ARCH REFER Cropmarks of field and woodland boundaries. Most on 1st Ed 6' Sheet 68 Monument Types BOUNDARY (Undated) FIELD BOUNDARY (Undated) Protected Status Historic Environment Character Area: Thames Gateway 114
Land to the east of Hanging Hill Lane and South of Sylvia Avenue (Ref: 029, 284 & 335)	Grade II Listed Building Name: Hare Hall SMR Number: 27357 Type of record: Listed Building Grid Reference: TQ 619 935 Map Sheet: TQ69SW Parish: BRENTWOOD, BRENTWOOD, ESSEX Summary: Late C16 timber framed house. unknown, 1970-1993 c., ECC Historic Buildings Photo Print Archive, 2 frames, (Photograph). SEX56253. Monument Types: TIMBER FRAMED HOUSE (C16, Medieval to Post Medieval - 1500 AD to 1599 AD) Protected Status: Listed Building (EH) (II) 1197216: HARE HALL Historic Environment Character Area: Thames Gateway 114
Ingatstone Garden Centre (Ref: 128)	No comment
Land adjacent to Ingatstone By-pass (Ref: 079A)	REFER TO ECC ARCH Name: Roman coin of Claudius SMR Number: 5479

Site	Observations
	Type of record: Find Spot Grid Reference: TQ 640 986
Land at Parklands (Ref: 078)	Cropmarks of a possible small ring-ditch and other linear ditches were recorded in 2010.
Former A12 Work Site (Ref: 106)	Name: Mountnessing Historic Settlement SMR Number: 19305 Type of record: Monument Grid Reference: TQ 633 975 Map Sheet: TQ69NW Parish: MOUNTNESSING, BRENTWOOD, ESSEX Summary: Medieval and post medieval historic settlement of Mountnessing
Post Field, Redrose Lane (Ref: 250)	WITHIN BLACKMORE HISTORIC VILLAGE REFER TO ECC ARCH
Land South of Redrose Lane (Ref: 076)	BLACKMORE SITES WITHIN BLACKMORE HISTORIC VILLAGE REFER TO ECC ARCH. Name: Smiths Hall (or Copsheaves Hall) SMR Number: 4205 Type of record: Monument Summary: Part of the remains of a moat Part of moat remains. <1> Photo in SMR. <2> Smiths Hall (see 4204) was Copsheaves Hall in 1371.<3> Medlycott, Maria, 2000, Blackmore: Historic Village Assessment (DESC TEXT). SEX59524.
Land South of Redrose Lane (Ref: 077)	Within site context Paslow Wood Common: refer to ECC Arch.
Land off Stocks Lane, Kelvedon Hatch (Ref: 075)	No comment
Brizes Corner Field, Blackmore Road, Kelvedon Hatch (Ref: 194)	Kelvedon Historic Settlement : Refer to HER. Name: Kelvedon Hatch Historic Settlement SMR Number: 19247 Type of record: Monument Grid Reference: TQ 568 993 Map Sheet: TQ59NE



Site	Observations
	Parish: KELVEDON HATCH, BRENTWOOD, ESSEX
Chestnut Field, Backmore Road (Ref: 294)	No comments
Land adj Tipps Cross Community Hall, Blackmore Rd (Ref: 085B)	No comments
The Hurst, Church Lane, Doddinghurst (Ref: 339)	No comments
Dunton Hills Garden Village (plan period) (Ref: 200)	GV II listed buildings within site and immediate site context. Potential Archaeology. Proximity to GVII* listed Park & Garden.

### 3. Sustainability Appraisal

3.1 In addition to advice provided by Council's Heritage Officer, the selection of development areas in Brentwood Borough Council has also been informed by the Sustainability Appraisal (SA) which guided where development was allocated and stipulated necessary policies and actions for sites with potential heritage impacts.

3.2 The SA has assessed the impact of proposed development allocations and policies on the historic environment. In the Local Plan Final SA Report January 2020 (Examination Document Library reference A3) set out the following summary in respect of impacts on heritage:

*"The Draft Plan appraisal (2016) identified some positives, and some potential drawbacks, but overall concluded no significant effects. Proposed changes to the spatial strategy (since 2016) similarly give rise to a 'mixed picture' in respect of impacts to heritage assets and the historic environment. However, it remains the case that significant negative effects are not predicted, noting good potential to suitably avoid/mitigate effects at the development management stage."*

3.3 Appendix VI (Spatial Strategy Alternatives Appraisal) of the Local Plan Final SA Report provides more detail in respect of how the alternative spatial options were assessed in terms of impact on cultural heritage (see pages 125-126). The conclusion of this assessment stated:

*"West Horndon West is considered to be the least constrained location, followed by DHGV, which leads to a conclusion that Options 3 and 6 perform best. Options 4 and 7 perform poorly as there would be a risk of impacts to two conservation areas (one of*

*which is also a registered park/garden) and several listed buildings; however, it is not possible to conclude significant negative effects - even after having considered the impacts that will result from preferred allocations that are a constant across the alternatives - given potential to avoid/mitigate effects through careful masterplanning and design (e.g. West Horndon East site promoters have submitted a scheme that seeks to respond to the constraints). Greatest concern potentially relates to the setting of the Weald Conservation Area / Registered Park and Garden and associated specific assets (listed buildings and a SAM)."*

## 4. Housing and Economic Land Availability Assessment (HELAA)

- 4.1 The Housing and Economic Land Availability Assessment (HELAA) October 2018 (Examination Document Library reference C24) sets out under paragraphs 3.8 and 3.9 that the approach to assessing potential development sites involved a first sift of excluding those sites if they were covered by a number of designations. Two of these comprised heritage designations including Scheduled Monument and Historic Parks and Gardens.
- 4.2 In addition, as set out under paragraph 3.13 of the HELAA there was consideration of the suitability of potential development sites based on whether there were Listed Buildings on or adjoining the site. The presence of a Listed Building did not result in automatic exclusion but if there was considered to be significant impact (i.e. would require demolition or there was not a large enough area of land to allow for appropriate separation) then the site would not be considered suitable to develop.

## 5. Site Allocation Policies

- 5.1 Following a review of sites, and exclusion of any which may cause significant heritage impacts, all allocated sites were identified as having good potential to suitably avoid/mitigate effects at the development management stage.
- 5.2 Site allocations that were identified through the SA process as having some heritage value or within close proximity to areas with historical significance, including archaeological potential and natural heritage, stipulate that a heritage assessment is required that takes account for the historical significance.
- 5.3 The following sites include heritage specific policies that require heritage assessments or considerations as part of any planning application:
- R01 Dunton Hills Garden Village
  - R04 and R05 Ford Headquarters and Council Depot, Warley
  - R07 Sow and Grow Nursery, Pilgrims Hatch
  - R09 Land off Warley Hill, Warley
  - R11 Westbury Road Car Park, Brentwood
  - R12 Land at Hunter House, Brentwood
  - R13 Chatham Way car park, Brentwood
  - R14 William Hunter Way car park, Brentwood
  - R15 Wates Way Industrial Estate

- R21 Land South of Ingatestone
- R25 Land north of Woollard Way, Blackmore
- R26 Land north of Orchard Piece, Blackmore
- E13 East Horndon Hall

5.4 In addition to site specific heritage assessment requirements, the draft Local Plan requires that all development proposals that affect heritage assets and their setting or natural assets are required to submit a Heritage Statement (HP19, NE01).

## 6. Issues raised by Essex County Council

6.1 In March 2018 in response to the Preferred Site Allocations Regulation 18 consultation, Essex County Council made representations which included comments relating to the historic environment. Under paragraph 4.167 of their representation they stated the following:

“ECC welcomes the inclusion of the historic environment, in the form of listed buildings and conservation areas, when considering sites for selection. However, the setting of heritage assets and the overall historic environment, including archaeology and landscape, should also form part of these considerations, which is currently omitted.”

6.2 Essex County Council then went onto provide site specific comments on the following sites;

- R01 (HEELA ref: 200) Dunton Hills Garden Village
- R11 (HELAA ref: 039) Westbury Road Car Park, Brentwood
- R12 (HELAA ref: 041) Land at Hunter House, Brentwood
- R13 (HELAA ref: 040) Chatham Way car park, Brentwood
- R14 (HELAA ref: 102) William Hunter Way car park, Brentwood
- R15 (HELAA ref: 003) Wates Way Industrial Estate
- R21 (HELAA ref: 106) Land South of Ingatestone
- R25 (HELAA ref: 077) Land north of Woollard Way, Blackmore
- R26 (HELAA ref: 076) Land north of Orchard Piece, Blackmore
- E13 (HELAA ref: 187) East Horndon Hall

6.3 These comments were addressed through the addition of heritage specific policy requirements for the sites requiring heritage assessments or considerations as part of any planning application.

6.4 The representations made by Essex County Council to the subsequent Local Plan Pre-Submission Draft (See page 278 of examination document A7, Annex H) did not raise any further concern regarding the specific site policies outlined in their previous representation. There were comments raised on Chapter 6 (Heritage) setting out that Brentwood BC should seek to ensure the Local Plan is supported by the appropriate heritage evidence. It was recommended that policies were reworded positively, and that consideration be given to the potential to consolidate policies. A further comment was raised requesting a link to Essex Historic Environment Record was added to footnote 7 of paragraph 6.120.

6.5 The Council is proposing to review and where appropriate amend policies HP19 to HP23 so that they are positively worded as suggested. The Council also agrees that the link to the

Essex Historic Environment Record can be added as an amendment. These amendments will be tabled at a later date.

## 7. Issues Raised by Historic England Representation

7.1 In March 2018 in response to the Preferred Site Allocations Regulation 18 consultation, Historic England made representations which recommended that policy wording be included for the following sites to ensure development is sympathetic to surrounding heritage assets or areas with potential archaeological significance, which were incorporated into the draft Local Plan:

- R11 Westbury Road Car Park, Brentwood
- R12 Land at Hunter House, Brentwood
- R13 Chatham Way car park, Brentwood
- R14 William Hunter Way car park, Brentwood
- R21 Land South of Ingatestone
- R25 Land north of Woollard Way, Blackmore
- E13 East Horndon Hall
- R09 Land off Warley Hill, Warley
- R04 and R05 Ford Headquarters and Council Depot, Warley
- R07 Sow and Grow Nursery, Pilgrims Hatch
- R26 Land north of Orchard Piece, Blackmore

7.2 Policy wording to ensure sympathetic development for sites at R02, E12, R06 and R22 was also recommended.

7.3 In addition to the abovementioned sites, it was recommended that a full heritage impact assessment and potentially additional characterisation and archaeological investigations to be undertaken for Dunton Hills Garden Village (R01); and a heritage impact statement for East Horndon Hall (E13).

7.4 No response was received for the Regulation 19 consultation in February 2019.

7.5 These representations were reiterated in Historic England Regulation 19 – Focussed Changes response in November 2019.

7.6 In response to the representations made it is proposed that a modification is made to policies relating to the following sites in accordance with Historic England recommendations to ensure potential heritage impact is considered as part of any future development:

- R02 Land at West Horndon Industrial Estate
- E12 Childerditch Industrial Estate
- R06 Land at Nags Head Lane, Brentwood
- R22 Land Adjacent to the A12, Ingatestone

7.7 Brentwood Borough Council is in the process of undertaking a heritage impact assessment for the Dunton Hills Garden Village proposal which will inform or amend the relevant policies set out in the draft Local Plan and any subsequent design documents. Subject to the outcomes of the completed assessment, it is also proposed that modifications be made to

policies relating to Dunton Hills Garden Village and East Horndon Hall to strengthen heritage considerations prior to any development taking place. This will require that a Heritage Impact Assessment is prepared for Dunton Hills Garden Village as part of the masterplanning work (also a mandatory requirement under the Dunton Hills Garden Village policies), and a Heritage Impact Statement prepared for East Horndon Hall ahead of any other planning application.

- 7.8 Since the submission of their representations Historic England have been involved with and taken part in a number of workshops for Dunton Hills Garden Village, whereby their comments have been recorded and imbedded into the emerging framework masterplan document. This document will set out mandatory principles that any development of the Dunton Hills Garden Village allocation site must comply with and will, amongst other things, provide a holistic approach to heritage considerations as part of a comprehensive policy framework.
- 7.9 Historic England continue to be involved with the detailed design process to ensure that the proposed design solutions incorporate and address the impact issues as and when they are identified. The draft Masterplan Framework and SPD is due for comment in Autumn 2020, when Historic England and others will be invited to comment. Brentwood Borough Council is confident that the Heritage Impact Assessment and the subsequent detailed policy work will demonstrate how development can come forward without causing harm to the setting of the heritage assets. Workshop discussions have concluded that there is an opportunity to make the heritage asset the centre-piece of the development.
- 7.10 The Council met with Historic England in May 2020 to discuss the contents of the Statement of Common Ground, including outstanding issues relating to Dunton Hills Garden Village. This meeting resulted in Brentwood Borough Council providing a summary of historic considerations that have been made since March 2018, in addition to the recently commissioned Heritage Impact Assessment which is due to be completed ahead of the Examination in Public. Brentwood Borough Council are actively working with Historic England to agree any issues that may arise throughout this process.
- 7.11 The conclusions of this work will be referred to in an updated Statement of Common Ground and detailed in the Dunton Hills Garden Village Topic Paper Response (to be submitted on 28 August 2020).

## 8. Summary and Next Steps

- 8.1 The summary of the historic approach taken for Brentwood Borough Council draft Local Plan is considered appropriate. By undertaking and internal review of significant heritage assets; assessing heritage as part of the methodological framework for the SA and considering heritage in the HELAA. Sites were further refined in the publication of the Pre-Submission Local Plan (January 2019) whereby the site allocation policies stipulated the necessary actions in relation to identified heritage assets. It is important to note that development proposed in the Local Plan will not result in the loss of any heritage assets. It is considered that development can be accommodated with appropriate mitigation.
- 8.2 Ongoing work remains in relation to Dunton Hills Garden Village as outlined above, however significant progress has been made to demonstrate how development can come forward

without causing harm to the setting of the heritage asset. Detailed assessments have been picked up through detailed design for DHGV and are subject to ongoing collaboration.

- 8.3 An overview of heritage considerations and assessment is being prepared through the Dunton Hills Garden Village Topic Paper Response (submitted August 28), along with a draft Statement of Common Ground with Historic England. This work will be shared as soon as possible to resolve any outstanding matters raised.