

A stylized tree with a grey trunk and branches, adorned with leaves in various colors including purple, blue, green, and orange. The tree is positioned on the left side of the page.

SOCG 01

Chelmsford Local Plan
Statement of Common Ground
with Historic England

June 2018

Our Planning Strategy to 2036

Chelmsford Local Plan

Statement of Common Ground with Historic England

1. This Statement of Common Ground identifies areas of common ground between Historic England and Chelmsford City Council in relation to Historic England's representations on the Chelmsford Pre-Submission Local Plan.
2. This Statement identifies all of the issues raised by Historic England in the representations listed in the tables below.
3. There are no areas of uncommon ground. However, there is one matter in which discussions have taken place between Chelmsford City Council and Historic England and an understanding of the position of each party has been reached.
4. CCC has worked with Historic England on the development of the Local Plan, the Sustainability Appraisal (SA) and the Habitat Regulations Assessment from the outset. In accordance with the Town and Country Planning (Local Development) (England) Regulations, Historic England has been formally consulted at every stage of consultation.

Areas of Common Ground

Pre-Submission Local Plan

Rep Number	Local Plan Ref	Summary of Historic England Representation	CCC agreed response with Historic England
PS1737	Paragraph 2.28	The paragraph refers to historic park gardens but the correct term is Registered Park and Garden. The wording should be amended accordingly.	Paragraph 2.28 amended to: “Chelmsford is also rich in history, with over 1,000 listed buildings, 25 Conservation Areas, 19 scheduled monuments and 6 historic park gardens Registered Parks and Gardens of Special Interest . Its historic landscape contains many archaeological sites dating back to pre-historic times.”
PS1752	Paragraph 2.28	It is advised that this section makes reference to Heritage at Risk (HAR). There are only two entries on the 2017 HAR register for Chelmsford, these are the Grade II* listed Church of St Michael, Roxwell and the West End Conservation Area.	New paragraph after paragraph 5.21 “ A Heritage at Risk programme has been implemented by Historic England. It protects and manages the historic environment so the number of ‘at risk’ historic places and sites across England is reduced. The Heritage at Risk Register identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. ”
PS1739	Paragraph 3.27	Request that Registered Parks and Gardens and Conservation Areas are also listed alongside Scheduled Monuments and Listed Buildings.	Paragraph 3.27 amended to: “Chelmsford has a wide range of planning designations such as Green Belt

			and other national environmental and heritage designations such as SSSI's, local wildlife habitats and woodlands providing biodiversity and ecological benefits. Chelmsford's historic environment is also important with a range of Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens . All of these contribute towards the local distinctiveness of the area and need to be protected and enhanced at the same time as achieving the growth required.”
PS1741	Strategic Policy S1	Request that the term heritage in bullet point 6 of the policy is replaced with the term historic environment.	<p>“The Council will apply the following guiding Spatial Principles to deliver the Strategic Priorities and Vision in order to underpin the Spatial Strategy:</p> <ul style="list-style-type: none"> • Maximise the use of suitable previously developed land for development • Continue the renewal of Chelmsford City Centre and Urban Area • Locate development at well connected sustainable locations • Locate development to avoid or manage flood risk • Protect the Green Belt • Protect Preserve and or enhance the character of valued landscapes, heritage the historic environment and biodiversity

			<ul style="list-style-type: none"> • Respect the pattern and hierarchy of existing settlements • Ensure development is deliverable • Ensure new development is served by necessary infrastructure • Use development to secure new infrastructure • Plan for the longer-term.”
PS1745	Strategic Policy S11: Infrastructure Requirements	Request that the policy is amended to makes specific reference to the presence of the heritage assets which may be affected by specific infrastructure projects and the need to conserve and enhance the historic environment.	<p>New heading under Strategic Policy S11 – Infrastructure Requirements</p> <p><u>Historic Environment</u></p> <p>Infrastructure necessary to support new development must seek to preserve or enhance the historic environment and mitigate any adverse impacts on nearby heritage assets and their settings.</p>
PS1747	Strategic Growth Site 1a: Chelmer Waterside sites	Wording would be improved to state “conserve or enhance the setting...” as this better reflects national legislation.	<p>Amend bullet point 11 to:</p> <p>“Protect Conserve or enhance the setting of designated and non-designated heritage assets. “</p>
PS1747	Strategic Growth Site 1a: Chelmer Waterside sites	With regards to the archaeological assessment it would be helpful if the policy was clearer to state whether this will be required upon application to aid decision making.	<p>Amend bullet point 13 to:</p> <p>“Undertake an a pre-application Archaeological Assessment”</p>

PS1748	Strategic Growth Site 1b: Essex Police Headquarters and Sports Ground, New Court Road	Recommend that the policy requires development to consider, conserve or where possible enhance the setting of the nearby listed building.	Council's response The site is being removed as an allocation.
PS1749	Strategic Growth Site 1f: Riverside Ice and Leisure Land, Victoria Road	Amended to refer to "the character or appearance of the adjoining conservation area and its setting" in place of character and appearance of the conservation area.	Amend bullet point 9 to: "Ensure protection and enhancement Preserve or enhance the character and or appearance of the adjoining Chelmsford Central Conservation Area and its setting. "
PS1751	Strategic Growth Site 1g: Civic Centre Land, Fairfield Road	Refer to "the character or appearance of the adjoining conservation area and its setting" in place of character and appearance of the conservation area.	Amend bullet point 7 to: "Ensure protection or enhancement of Preserve the setting of the Grade II listed War Memorial, conserve the setting of the locally listed Civic Centre entrance building, and preserve or enhance the character and or appearance of the West End Conservation Area and its setting. "
PS1751	Strategic Growth Site 1g: Civic Centre Land, Fairfield Road	Recommend that the supporting text of the policy makes reference to the 2017 National Heritage at Risk Register (HAR) status of the Conservation Area as this will help encourage enhancements.	Amend paragraph 7.78 to: "Development on a wider site should protect and seek to enhance preserve the setting of the Grade II listed War Memorial on Duke Street, conserve the setting of the locally listed Civic Centre main entrance building, and preserve or

			enhance the character and or appearance of the adjoining West End Conservation Area and its setting. The West End Conservation Area is on the Conservation Areas at Risk Register in 2018. The Council will support development that provides opportunities to enhance the Conservation Area. “
PS1752	Strategic Growth Site 1h: Eastwood House Car Park, Glebe Road	Refer to “the character or appearance of the adjoining conservation area and its setting” in place of character and appearance of the conservation area.	Amend bullet point 8 to: “ Ensure protection or enhancement of Preserve or enhance the character and or appearance of the adjoining West End Conservation Area and its setting.”
PS1752	Strategic Growth Site 1h: Eastwood House Car Park, Glebe Road	Recommend that the supporting text of the policy makes reference to the 2017 National Heritage at Risk Register (HAR) status of the Conservation Area as this will help encourage enhancements.	Amend paragraph 7.92 to: “Although there are no heritage assets on the site, development should protect preserve and seek to enhance the character and or appearance of the adjoining West End Conservation Area and its setting. The West End Conservation Area is on the Conservation Areas at Risk Register in 2018. The Council will support development that provides opportunities to enhance the Conservation Area.”

PS1753	Policy GR1: Growth Sites in Chelmsford Urban Area	Wording is amended to refer to “preserve or enhance character or appearance”.	Amend bullet point 7 to: “Preserve or enhance the character and or appearance of Conservation Areas.”
PS1754	Growth Site 1k: Rectory Lane Car Park West	Wording is changed to character or appearance rather than character and appearance.	Amend bullet point 5 to: “ Protect Conserve the setting of the nearby locally listed King Edward VI School, and protection preserve or enhancement of the character and or appearance of the adjoining John Keene Memorial Homes Conservation Area and setting. ”
PS1755	Growth Site 1L: Car Park to the west of County Hotel, Rainsford Road	Wording is changed to character or appearance rather than character and appearance.	Amend bullet point 5 to: “ Protect Conserve the setting of the nearby locally listed Trinity Methodist Church, and protection preserve or enhancement of the character and or appearance of the adjoining West End Conservation Area.”
PS1757	Growth Site 1n: BT Telephone Exchange, Cottage Place	Wording is changed to character or appearance rather than character and appearance.	Amend bullet point 4 to: “ Respect Preserve the setting of the nearby Grade II listed Imperial House and The Wheatsheaf, conserve the setting of the locally listed Cathedral Court, and ensure protection preserve or

			enhancement of the character and or appearance of the adjoining Chelmsford Central Conservation Area.”
PS1759	Growth Site 1p: Waterhouse Lane Depot and Nursery	It would therefore be helpful if bullet point 5 could be expanded to include reference to the setting of the Grade II listed barn.	Amend bullet point 5 to: “Development layout should ensure sensitive treatment to allotments boundary and the preservation of the setting of the nearby grade II listed barn. ”
PS1760	Growth Site 1r: British Legion, New London Road	The wording of bullet point 4 in the policy should be amended to: “architecture development should respect will preserve or enhance the character and or appearance of the New London Road Conservation Area and the setting of the grade II listed Southborough House”.	Amend bullet point 4 to: “ Architecture Development should respect will preserve or enhance the character and or appearance of the New London Road Conservation Area, an preserve the setting of the grade II listed Southborough House and conserve the setting of the adjacent locally listed building. ”
PS1762	Growth Site 1v: Car Park r/o Bellamy Court, Broomfield Road	Recommend that the wording is changed to character or appearance rather than character and appearance.	Amend bullet point 3 to: “ Respect Preserve the setting of the Grade II listed Coval Hall to the west, and protection or enhancement of preserve or enhance the character and or appearance of the adjoining West End Conservation Area and its setting. ”

PS1763	Opportunity Site OS1a: Rivermead, Bishop Hall Lane	Advise that the policy makes explicit reference to the need for development to have regard to the setting of the listed building.	Amend bullet point 7 to: “ Respect Preserve for the waterside character and the setting of the adjacent listed Mill House and pond.”
PS1770	Existing Commitment EC2: Land surrounding telephone exchange, Ongar Road, Writtle	Recommend that the wording is changed to character or appearance rather than character and appearance, and conserve or enhance rather than conserve and enhance.	Amend bullet point 4 to: “ Conserve Preserve and or enhance the character and or appearance of the Writtle Conservation Area and its setting. ”
PS1777	Strategic Growth Site 4: North East Chelmsford	There is a need to identify heritage assets affected by the allocation and include policy criteria to secure their conservation or enhancement.	Amend paragraph 7.229 to: “Development design and layout is expected to conserve preserve and or where opportunities arise enhance the character and or appearance of the Little Waltham Conservation Area and preserve the listed buildings and their setting on and close to the site. These include a Grade II Registered Park and Garden, New Hall and Grade I listed New Hall, Grade II listed barns at Old Lodge, Bulls Lodge, Belsteads Farmhouse and barn, Channels Farmhouse, Mount Maskells, Powers farmhouse, Peveral’s Farmhouse, Shoulderstick Haul, Hobbits, Shuttleworth, Pratts Farmhouse and Pratts Farm Cottages. The masterplan process will establish the detailed

			preservation and enhancement principles for this site.”
PS1777	Strategic Growth Site 4: North East Chelmsford	Request that bullet point 23 makes reference to the setting of the Little Waltham Conservation Area.	Amend bullet point 23 to: “ Conserve and Preserve or enhance the historic environment including and preserve or enhance the character and or appearance of the Little Waltham Conservation Area and its setting. ”
PS1777	Strategic Growth Site 4: North East Chelmsford	The Heritage Technical Note (March 2017) on the North East of Chelmsford area makes a number of recommendations including that a generous landscape buffer is required to protect the settings of existing rural farmsteads including Powers Farm, Peverels Farm, Park Farm Channels, Bedsteads and the group on Wheelers Hill/Cranham Road. Map 1 shows the extent of major housing-led development immediately abutting the south of Powers Farm and the entirely surround Peverals Farm with no buffer in place at all which is against the recommendations of the Heritage Technical Note (March 2017).	Add a new bullet after bullet point 24 (‘preserve the setting of listed buildings in or close to the site’): “ Provide a generous landscape buffer to preserve the settings of nearby heritage assets including Powers Farm, Peverels Farm, Park Farm Channels, Bedsteads and those on Wheelers Hill/Cranham Road. ”
PS1777	Strategic Growth Site 4: North East Chelmsford	The Heritage Technical Note (March 2017) states that a planting belt and careful consideration of building layout, height, scale, roof forms and landscaping will be significant considerations when assessing the impact on the Little Waltham Village Conservation Area and Pratts Farm given the rising land and prominent skyline.	The Council clarified that design parameters and planting requirements in relation to nearby heritage assets will be considered through the masterplanning process. A copy of the masterplan procedure was also sent. No further objections raised by Historic England.

PS1777	Strategic Growth Site 4: North East Chelmsford	The Heritage Technical Note (March 2017) is useful and draws a number of tangible conclusions however it does not fully consider the cumulative impacts of the development together with the existing committed development around New Hall.	Chelmsford Local Plan Heritage Assessments Technical Note Addendum May 2018 was prepared and has been agreed by Historic England.
PS1777	Strategic Growth Site 4: North East Chelmsford	A concern that the policy ends by stating that the Master plan will need to be underpinned by Garden City Principles. The Garden City Principles referred to are those established by the TCPA but these principles are silent on the historic environment and contain no overarching principle regarding the implication of development upon the historic environment. We are therefore concerned that the TCPA principles do not reflect the NPPF in terms of what it takes to mean as sustainable development. The Garden City Principles are also intended to be used for new settlements rather than strategic urban extensions such as the case here.	Purpose of Garden City principles clarified by the Council. No further objections raised by Historic England.
PS1777	Strategic Growth Site 4: North East Chelmsford	It is not clear from the draft plan whether or not the requirements of Appendix D will relate to the new allocation or whether it relates solely to the existing committed development around New Hall. In addition, there appear to be major inconsistencies between Map 1 of the policy proposals in the current draft and fig. 20 of Appendix D in the same draft plan. It is crucial to understand the relationship between the new development and the committed development at New Hall.	Amendment to additional wording at Appendix D: The provisions within Appendix D only relate to the implementation of the NCAAP masterplan area. Some of the provisions in Appendix D cover areas outside of the NCAAP masterplan area as now shown on the Local Plan Policies Map (Masterplan Area for Existing Committed Development). This includes part of Strategic Growth Site 4 North East Chelmsford. Where this is the case, the new Growth Site 4 North East allocation and its subsequent masterplan supersedes the provisions in Appendix D.

PS1783	Strategic Growth 6: North of Broomfield	The wording of the eighth bullet point is amended to read “protect or enhance the setting of nearby heritage assets, including the scheduled monument.” The wording in the draft at present would not cover the conservation area, only historic properties and the scheduled monument.	Amend bullet point 8 to: “ Protect Conserve or enhance the setting of historic properties and of nearby heritage assets and protect the setting of the nearby scheduled monument to the north of the site. ”
PS1785	Existing Commitment EC3: Great Leighs, Land east of Main Road	The policy is amended to consider the setting of the scheduled monument at Gubbion’s Hall as well as nearby listed buildings.	Amend bullet point 4 to: “ Protect Preserve the setting of listed buildings along Main Road and protect the setting of the scheduled monument at Gubbion’s Hall. ”
PS1786	Existing Commitment EC4: East of Boreham	The policy is amended to read “protect or where possible enhance the character or appearance of the two conservation areas ...”	Amend bullet point 4 to: “ Protect and Preserve or where possible enhance the character and or appearance of the two conservation areas in the vicinity of the site.”
PS1787	Strategic Growth Site 7: North of South Woodham Ferrers	Request that the wording is amended to include an explicit reference to the setting of nearby heritage assets.	New bullet point under ‘Historic and natural environment’ • Conserve or enhance nearby listed buildings and their settings
PS1798	Strategic Growth Site 9: Danbury	There does not appear to be any map showing this site allocation as such it is not possible for us to comment. In the absence of a map showing the location and extent of the site this allocation cannot be said to be sound.	Council clarified delivery through a Neighbourhood Plan and directed Historic England to paragraph 7.357. No further objections raised by Historic England.

PS1790	SPA 2: Chelmsford City Racecourse Special Policy Area	The policy requirements should be amended to ensure that the development in this area would preserve the nearby listed buildings and their settings.	Amend Policy SPA2 to: “The Council will support proposals which provide ancillary functions to support the operation of the Racecourse, subject to good design quality; promoting more sustainable means of transport to the site and reducing use of individual trips by car; protecting and enhancing existing trees and hedgerows; preserving nearby listed buildings and their settings ; minimising the impact of floodlighting; minimising environmental impacts including in respect of ecology and landscape, and ensuring the full restoration of the existing minerals site.”
PS1795	Policy NE2: Tree, Woodland and Landscape Features	Advise that the policy is amended to ensure that the policy provides adequate coverage of designated.	Amend Policy NE2 to: “Planning permission will only be granted for development proposals that do not result in unacceptable harm to the health of a preserved tree, trees in a Conservation Area or Registered Park and Garden , preserved woodlands or ancient woodlands. Consideration will also be given to the impact of a development on aged or veteran trees found outside ancient woodlands.”

PS1799	Policy MP6: Tall Buildings	<p>There is however some concern regarding the implications of the text in paragraph 9.31 which suggests that tall buildings may be acceptable around transport interchanges of train and bus services. Chelmsford train station for example, sits within the West End Conservation Area (a conservation area on the National at Risk Register) and adjacent to the Central Chelmsford Conservation Area, the Grade II listed Law Library is also opposite the station. The station is therefore in a sensitive location surrounded by designated heritage assets. We recommend that reference to the suitability of tall buildings around the train station is removed from the text or that the text is amended to better reflect the local conditions of Chelmsford City.</p>	<p>Amend paragraph 9.31 to delete reference to tall buildings around transport interchanges.</p> <p>“Tall buildings may be appropriate where their setting is sufficient to accommodate their height, where they contribute to a cohesive skyline and where they will form part of the positive reshaping and enhancement of the City Centre from all vantage points. In order not to diminish cultural, civic or public buildings or spaces, tall buildings may not be appropriate where they would have a significant or adverse impact upon designated and non-designated heritage assets. Suitable locations for tall buildings may be areas that are the most well-connected by public transport whilst providing opportunities to make the most efficient use of land; and around the transport interchange of the train and bus stations or large public spaces where tall structures are able to make a positive contribution to the existing character and context of an area subject to all of the above justifications. Tall buildings will not be acceptable on constrained sites where an appropriate setting cannot be achieved.”</p>
PS1800	Chapter 10: Monitoring and Implementation	<p>There is concern that the monitoring indicators are too general and do not reflect the specific objectives of the plan.</p>	<p>See Appendix 1 - Parties agree</p>

Appendix 1

Chapter 10, Table 5: Monitoring Framework – Strategic Policies

Local Plan Policy	Strategic Priority	Key Indicators	Source	Target
Strategic Policy S5 - Conserving and Enhancing the Historic Environment	1, 7	Completion of Conservation Area Appraisals and Management Plans Appeal Decisions	AMR 5 Year Review	Not required The Council will designate and keep under review Conservation Areas in order to protect and enhance their special architectural or historic interest
Strategic Policy S5 – Conserving and Enhancing the Historic Environment	1, 7	Update of the National Heritage at Risk Register	AMR	Annually

Other matter

Pre-Submission Local Plan

Rep Number	Local Plan Ref	Summary of Historic England Representation	Position of Parties
PS1777	Strategic Growth Site 4: North East Chelmsford	<p>(Overall summary of rep. PS1777)</p> <p>We recommend that the allocated land use areas shown on the policy proposals map are amended to reflect those in the NCAAP and the recommendations made in the Heritage Technical Note (March 2017). If the Council is not able to amend the policy proposals map we then request that the recommendations of the Heritage Technical Advice Note are referred to in the policy i.e. the need for sizable buffer zones etc. and that text is included to caveat the policy proposals map so that it is plain to any reader and to any interpretation that the map does not show the actual position of development.</p> <p>Following further discussions</p> <p>Request for a strategy/concept diagram that shows:</p> <ol style="list-style-type: none"> The relationship between the existing commitment and the new allocation The extent of the developable area Heritage assets Mitigation measures in diagrammatic form 	<p>Council</p> <p>The concerns are noted however the purpose of the Policies Map is to show the policy areas proposed by the Local Plan – this wording is specified on the Policies Map. It does not mean the whole area shown will be developed; the detailed delivery and developable area is brought forward through, firstly, the site-specific requirements of the allocation as set out at section 7 of the Plan. And secondly, through masterplanning - masterplans are required to be approved by the Council and as set out in paragraph 7.5 of the Plan a masterplan will cover the details of how each site will satisfy the requirements of their respective Site Policy. The Council will wish to engage with Historic England as part of this process.</p> <p>Historic England</p> <p>Whilst Historic England believe it would be clearer to have a concept/strategy diagram for such a site, as is seen in other Local Plans, Historic England appreciate the Council's position and will</p>

			not be pursuing this matter further but looks forward to engagement in the masterplanning process.
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Signatories:

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