



ENGLISH HERITAGE

WEST MIDLANDS

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Dear Ms Frith

### **SEA Scoping Consultation for Stratford-upon-Avon Neighbourhood Development Plan**

Thank you for consulting English Heritage in relation to the above scoping document.

We would like to commend the approach taken, that is, scoping the Neighbourhood Plan for likely effects prior to its' development into a firm draft form, rather than, as often happens, "retrofitting" the SEA scoping onto an already highly developed Neighbourhood Plan. We consider the document generally conforms well to national guidance on SEA preparation. It covers a suitably wide range of areas and topics including a good appreciation of the Historic Environment and consideration of the range of Heritage Assets that may be susceptible to future impacts. In this context we would wish to emphasise the importance of considering impacts upon the **setting** of Heritage assets. As you may well be aware English Heritage has published guidance on SEA specifically aimed at historic environment considerations and that can be found at the web address below.

<http://www.english-heritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>

English Heritage does, however, have some recommendations that you may like to take into account. We would always encourage the development of a high degree of synergy between the SEA for the Neighbourhood Plan and that prepared for the Local Plan, so that there is consistency as between approach, baseline, plans and programmes, monitoring indicators etc. With this combined approach we believe the SEA can not only assess but also contribute to the Neighbourhood Plan by creating a context for the development of a positive strategy for the enhancement of the historic environment in that area "nesting" with the strategy in the Local Plan.



We also have a number of specific comments:

- Regarding monitoring indicators, we generally encourage their use and the inclusion of a number relevant to the historic environment would be useful. We note and commend the inclusion of heritage at risk within the scoping report and consider this could make an appropriate monitoring indicator. There are some further pertinent details in our SEA guidance document;
- Regarding the historic environment baseline data for the SEA it is not apparent that this has benefitted from direct input from the County Council Historic Environment Team or local authority conservation staff at the District Council. Comprehensive data on Heritage Assets in the Neighbourhood area will be available from the Warwickshire Historic Environment Record held by the County Council. They also hold, for example, Historic Environment Character Assessments based on a county-wide Historic Landscape Characterisation. A detailed Extensive Urban Survey of Stratford-on-Avon is also nearing completion and will contain much directly relevant information;
- Cross boundary effects are an important consideration in SEA - there may well be heritage assets designated or undesignated that cross administrative boundaries. A check could be made on this using the sources cited above;
- The same sources could assist in populating the plans and programmes section of the SEA through the inclusion of further documents relevant to the historic environment.
- Finally, as regards nomenclature and to ensure consistency with the terminology of the National Planning Policy Framework (NPPF) we would suggest that in paragraph 9.1.1 references to “preservation” should be amended to read “conservation”. Also, throughout the document the term “Heritage Asset” rather than historic asset should be used, in line with the precise definition of the term found in the NPPF.

In conclusion, overall English Heritage consider the SEA to be a very positive document that demonstrates good practice and will be of great assistance in relation to Plan production. Should you wish to discuss any points within this letter, or if there are issues about this Neighbourhood Plan Area where the historic environment is likely to be of particular interest, please do not hesitate to contact me.

Yours faithfully,



Pete Boland  
Historic Places Adviser

