



Historic England

Ms Claire Hattam
Durham County Council
Low Carbon Economy, Regeneration & Local Services
County Hall
Durham
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Direct Dial: 0191-2691232

Our ref: PL00056222

5 July 2019

Dear Ms Hattam

**Environmental Assessment Regulations 2004: Regulation 13
Durham City Neighbourhood Plan: SA Report, 2019**

Thank you for consulting Historic England on the above Sustainability Appraisal (SA), which, as set out on p3 of the report, has been completed in lieu of a Strategic Environmental Assessment (SEA). As the public body that advises on England's historic environment, we are pleased to offer our comments.

We broadly welcome the process set out in the SA report, which has moved forwards considerably and favourably since our engagement with the SEA screening and scoping stages from 2017. However, we have the following comments to make, referring to our guidance in *Sustainability Appraisal and Strategic Environmental Assessment* (Historic England Advice Note 8, December 2016):

- As well as the Co Durham Plan, para 2.3 of our guidance identifies other plans, programmes and policies which will be relevant to the context of this SA, including acts of parliament and international treaties.
- The third bullet under Landscape and Historic Environment on page 13 does not identify archaeology (either scheduled monuments or non-designated remains) in the range of heritage assets set out. It should also note that registered parks and gardens and registered battlefields are designated heritage assets (ie. national statutory designations) and not just identified locally. It should also set out that the significance of any heritage asset can be generated by its setting, a very important issue for this neighbourhood plan. These concerns are also seen in para 5.29.
- Whilst the assessment should follow a proportionate approach, more could be done to set out evidence for the current and future likely condition of the historic environment in terms of its significance, sensitivity and capacity to accommodate change. Our guidance says that simply identifying heritage assets is unlikely to produce the most helpful baseline analysis. I accept that the appendix provides some of the evidence in use for the neighbourhood plan project, but clearer reference to the evidence would strengthen the assessment.
- In the assessment framework, including a question in the Landscape and Historic Environment theme around keeping historic buildings in use would



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recognise the issue of growing vacancy in the city centre. Seeking a reduction in the impact of traffic on the historic environment could have been identified under the Transport theme.

- We broadly welcome the approach taken to assessing housing allocations, although we have not seen the *Site Assessment Report Addendum (2018)* referred to. We are satisfied that the most harmful options have been discounted for reasons relevant to the historic environment. We have previously expressed concern about potential allocations at Lovegreen (Site E) due to their impact on Crook Hall and other nearby listed buildings, as well as on the Durham City Conservation Area and World Heritage Site.

The report does not address indicators and monitoring of the plan's effects. Paras 2.13-2.16 of our guidance set out how historic environment indicators should be included to enable monitoring.

We agree with the report's recommendations on mitigation or optimisation as far as they affect our area of interest. The key issue now will be for the plan's wording to be refined to ensure the policies achieve the desired objectives.

Thank you once again for the opportunity to comment. I hope our comments will be useful. Please contact me should you require any clarification.

Yours sincerely,

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