



Historic England

Planning Policy  
Town Hall,  
Darlington,  
County Durham,  
DL1 5Q.

Our ref: [REDACTED]  
Your ref:

Telephone [REDACTED]  
Mobile [REDACTED]

Date 22 September 2016

[REDACTED]

Dear Sir/Madam

### Consultation on the Darlington Local Plan Sustainability Appraisal Scoping Report

Thank you for consulting Historic England on the Darlington Local Plan Sustainability Appraisal Scoping Report. As the Government's statutory adviser on all matters relating to the historic environment in England, we champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, conserved and enjoyed.

Protecting and enhancing the historic environment is integral to the achievement of sustainable development, as noted within the National Planning Policy Framework (NPPF). The Sustainability Appraisal (SA) process should therefore ensure that any potential impacts upon the historic environment have been properly considered. This will also need to encompass the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), which identifies that particular regard should be had for cultural heritage when undertaking an SEA.

While we do not have the resources to be able to comment in detail on the Scoping Report at this stage in the Local Plan preparation, Historic England has produced guidance on what constitutes an effective assessment of the historic environment under SEA/SA. This can be accessed from our website at <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>, along with links to other useful guidance regarding the preparation of Local Plans. This includes recommendations on: relevant plans, programmes and policies; the testing of baseline information; key sustainability issues which might affect the historic environment; indicators and monitoring; and the assessment process.

In addition to the national plans and programmes mentioned in the guidance, we would also recommend including the recent Culture White Paper (DCMS 2016), the Historic England Good Practice Advice Notes in Planning, and the Historic England Advice Notes. At the regional level, we would recommend including the North East Case for Culture.

The Sustainability Issues (Table 3) refers only to the potential risk to local heritage from new development. The Historic England guidance referenced above provides more detail on types of



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issues, but it is worth noting that heritage assets are at risk from many pressures, not just new development, and these include neglect and decay.

The cultural heritage objective in Table 4 would be better worded if it referred to the need to conserve and enhance, and also included reference to setting. The decision making criteria should also recognise that the avoidance of harm to the significance of heritage assets, including their setting, should be the overall aim. Again, there is more detail within the guidance.

The report does not appear to include any details on indicators or monitoring, which we assume would be included in the final report?

We would strongly recommend that the relevant conservation staff and archaeological advisers are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on aspects such as: local historic environment issues and priorities, including access to data held in the Historic Environment Record; how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

We hope that this information is helpful, but please do not hesitate to contact us should you require any further information.

Yours sincerely

