

## Alison Osborne-Newbold

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**From:** Jade Bagley  
**Sent:** 07 November 2023 16:37  
**To:** Planning Policy  
**Subject:** FW: Response of Historic England to Regulation 19 consultation  
**Attachments:** HE Response Letter to NBLPR Reg 19 121023.pdf; Appendix A HE Response to Reg 19 Oct 2023 .pdf; Appendix B HE Response to Reg 19 OCT 2023.pdf

**Categories:** Processed

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**From:** Boden, Elizabeth <[REDACTED]>  
**Sent:** Thursday, October 12, 2023 4:41 PM  
**To:** Planning Policy <planning.policy@nuneatonandbedworth.gov.uk>; Jacqueline Padbury  
[REDACTED] Sarah Matile  
**Subject:** Response of Historic England to Regulation 19 consultation

Dear Jacqui & Sarah,

Please find attached the response letter of Historic England, plus Appendices A and B, to the Nuneaton and Bedworth Borough Council Regulation Borough Plan Review Publication Draft Plan – Regulation 19 consultation.

Please would you acknowledge receipt?

Kind regards,

Elizabeth Boden (MRTPI) | Historic Environment Planning Adviser |  
Telephone: 07823 878 657 Working days: Tuesday / Wednesday / Thursday AM

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Appendix A

Comments of Historic England - Schedule of Proposed Strategic Allocations – October 2023

Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
Policy SHA-1	Top Farm, Nuneaton	Residential – 1,700 dwellings	<p>HE notes that whilst the HSA document has scored this site as <b>Medium</b> for heritage sensitivity, it has been assessed as <b>High</b> for archaeological potential.</p> <p>We also note that although some of the HSA recommendations are reflected in Policy SHA-1 <b>no</b> reference is made specifically to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
Policy SHA-2	Arbury, Nuneaton	Residential – 1,525 dwellings	<p>We note that the HSA document has given the site a Heritage Sensitivity Score of <b>Medium</b>. Given the findings of the ‘Impact Assessment’ we consider that this should be <b>High</b>.</p> <p>We welcome that the Key development principles of Policy SHA-2 include a requirement at clause 15 for an asset management plan for the Arbury Estate, which includes measures to be taken and commitments to the repair and maintenance of the Park Farmhouse, Tea House, Bath House and Arbury Mill. We also note the requirement for a landscape buffer on southern &amp; western edge of site (clause 16) and that no access is to be taken from North Drive (clause 33).</p>



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			<p>We also note that para.7.46 refers to a heritage partnership agreement as an alternative mechanism for securing the repair and maintenance of the LBs at risk, and the reference at clause 37 of the policy to the recent Arbury Design Code SPD, on which HE commented in March 2022.</p> <p>HE considers that whilst there may be opportunities for harm to be mitigated through the design of the development, landscaping and enhancements, this would require further assessment through a Heritage Impact Assessment, which should accompany any planning application.</p> <p>Historic England would be willing to work in partnership with the Council as it progresses any further masterplan for the site in order to minimise harm to the heritage assets nearby.</p> <p>HE also notes that the study area contains a range of non-designated heritage assets, dating from the Palaeolithic to modern periods and that the HSA recommends that a programme of archaeological recording should be required to investigate the nature of and significance of any archaeological remains present. However, HE notes that these recommendations have not been carried through into the Key development principles of Policy SHA-2 and we therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
Policy SHA-3	Land at Tuttle Hill, Nuneaton (Judkins Quarry)	Residential – 350 dwellings	HE welcomes the reference in Policy SHA-3 to locally listed heritage assets and the provisions of Clause 17 requiring that development should use the canal as the key reference and focal point to the design and should take the opportunity to improve the setting of the canal, which should include better public access and interpretation.





Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
Policy SHA-4	Hospital Lane, Bedworth	Residential – 445 dwellings	<p>HE notes that whilst the HSA document has scored this site as <b>Medium</b> for heritage sensitivity, it has been assessed as <b>High</b> for archaeological potential.</p> <p>We also note that although some of the HSA recommendations are reflected in Policy SHA-4 <b>no</b> reference is made specifically to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
Policy SHA-5	West of Bulkington	Residential – 348 dwellings	<p>HE notes that Policy SHA-5 does not make any specific reference to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
Policy SHA-6	Land at former Hawkesbury Golf Course, Bedworth	Residential – 176 dwellings	<p>HE notes that Policy SHA-6 does not make any specific reference to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p> <p>We also note that despite the recommendations of the HSA Policy SHA-6 does not mention setting of the canal and preserving/enhancing views to Grade II listed engine house. HE therefore suggests that these requirements are integrated into Policy SHA-6 to help preserve the industrial character of the Coventry Canal and its historic relationship with the engine house.</p>





Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
Policy SEA-2	Wilsons Lane	Employment – 19.09 ha Residential – 75 dwellings	HE notes that although Clause 16 of Policy SEA-2 includes a provision to retain areas of ridge and furrow within open spaces, there is no requirement for a programme of archaeological recording within the policy, as recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
Policy SEA-3	Prologis Extension, Coventry	Employment – 3.58ha	HE notes that although Policy SEA-3 includes a clause requiring the retention/enhancement of landscape screening to the northern boundary, it does not include a requirement for a programme of archaeological recording, as recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
Policy SEA-4	Coventry Road, Nuneaton	Employment – 9.59ha	HE supports clause 17 of Policy SEA-4 and the objectives of para. 7.120 to pursue, where possible, opportunities to improve the heritage features of the area and their link to the work of George Eliot.  However, we note that the policy does not include a requirement for a programme of archaeological recording for the northern half of the site and given the findings of the HSA in this respect we suggest that the views of the Warwickshire County archaeological service are sought on this matter.





<b>Site Identification Reference/Policy</b>	<b>Location</b>	<b>Proposed Use</b>	<b>Historic England (HE) comments on:  Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
Policy SEA-6	Bowling Green Lane	Employment – 19.49 ha Residential – 150 dwellings	<p>HE welcomes inclusion of clause 11 of Policy SEA-6 to provide an enhanced buffer in south-eastern corner to protect setting of Exhall Scheduled Monument &amp; Listed Buildings and the requirement that the scale of development does not detract from the prominence and importance of the Listed Buildings.</p> <p>However, we note that the policy does not include a requirement for a programme of evaluative archaeological recording, as recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
Policy CEM-1	Land north of Marston Lane, Bedworth	Burial ground	<p>HE notes that Policy CEM-1 does not include a requirement for a programme of evaluative archaeological recording and given the findings of the HSA in this respect we suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>





**Appendix B**

**Comments of Historic England - Schedule of Proposed Non-strategic Allocations – October 2023**

Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
NSRA1	Former Bedworth Rugby Club, Smarts Road, Bedworth	Residential - 124 dwellings	HE notes that the guidance for site NSRA1 does not make any specific reference to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
NSRA2	Former Manor Park Community School, Nuneaton	Residential -123 dwellings	HE welcomes that the guidance for this site includes ensuring that development is sensitive to its location adjacent to the conservation area, that development reflects the characteristics of the surrounding townscape.  However, we note that <b>no</b> reference is made specifically to the requirement for a further programme of archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
NSRA3	West of Coventry Road/Wilson Lane	Residential – 95 dwellings	HE notes that the guidance for site NSRA3 does not make any specific reference to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.



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Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
NSRA4	Vicarage Street Development Site, Nuneaton	Residential – 65 dwellings	<p>HE notes that despite the recommendations of the HSA, and our previous comments on this proposed allocation, no reference is made in the guidance for NSRA4 that development should respond to and enhance the special interests of the conservation area and the setting of the nearby listed buildings. We suggest that this addressed and that a Heritage Impact Assessment be required prior to the granting of any planning permission for residential development.</p> <p>Furthermore, there is also no requirement for further archaeological evaluation in the guidance for site NSRA4, which is recommended by the HSA and we therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
NSRA-5	Land rear of Burbages Lane, Ash Green	Residential – 47 dwellings	<p>HE notes that whilst the HSA document has scored this site as <b>Low</b> for heritage sensitivity, it has been assessed as <b>Medium</b> for archaeological potential. HE notes that the guidance for site NSRA5 does not make any specific reference to the requirement for further archaeological evaluation, which is recommended by the HSA. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
NSRA6	Land at Bucks Hill, Nuneaton	Residential – 40 dwellings	<p>HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA6 to any requirement for further archaeological evaluation. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>







Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
NSRA 7	Abbey Street, Nuneaton	Residential – 30 dwellings	<p>HE notes that despite the recommendations of the HSA, and our previous comments on this proposed allocation, no reference is made in the guidance for NSRA7 to the proposed locally listed buildings, the impact on the setting of the Nuneaton Town Centre Conservation Area &amp; on the setting of the nearby Grade II listed Ritz Cinema building.</p> <p>HE therefore suggests that the recommendations of the HSA be reviewed and incorporated into the guidance for NSRA7. We also consider that there is an opportunity through development to give a better sense of the historic form of Abbey Street and restoration of a continuous street frontage, as per the historic mapping.</p>
NSRA8	Land rear of Lilleburne Drive and Willow Close, Nuneaton	Residential – 29 dwellings	<p>HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA8 to any requirement for archaeological evaluation. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
NSRA9	Former New Inn Public House, Bulkington	Residential – 25 dwellings	No comments.





Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
NSRA10	Land at Bermuda Road, Nuneaton	Residential – 25 dwellings	HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA10 to any requirement for archaeological evaluation that may be required. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
NSRA11	Upper Abbey Street, Nuneaton	Residential – 22 dwellings	HE notes that despite the recommendations of the HSA, and our previous comments on this proposed allocation, no reference is made in the guidance for NSRA11 that development should consider opportunities to enhance the setting of the nearby Grade II listed Ritz Cinema, including low rise development so as not to compete with the scale of the cinema. HE therefore suggests that the guidance for NSRA11 be reviewed and amended to include these requirements.
NSRA12	Kingswood Road, Nuneaton	Residential – 20 dwellings	HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA12 to any requirement for archaeological evaluation, or to the opportunity to maintain or improve access and public understanding of a rare historic landscape (nearby remnant of ancient woodland – Kings Wood). We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.
NSRA13	Armson Road, Exhall	Residential – 16 dwellings	HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA13 to any requirement for further archaeological recording. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.





Site Identification Reference/Policy	Location	Proposed Use	Historic England (HE) comments on:  <b>Nuneaton &amp; Bedworth Local Plan: Heritage Site Assessments (HSA) and relevant Local Plan policy/guidance</b>
NSRA14	Mill Street / Bridge Street, Nuneaton	Residential – 15 dwellings	<p>HE notes that despite the recommendations of the HSA, and our previous comments on this proposed allocation, although the Nuneaton Town Centre Conservation Area is referenced in the guidance for NSRA14, no suggestion is made as to how the development should respond to and enhance the special interests of the conservation Area, and the setting of the nearby listed buildings, whilst also enhancing the significance and setting of the conservation area.</p> <p>The guidance also omits to mention any requirement for archaeological evaluation that may be required, and we therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>
NSRA15	Bennetts Road, Keresley Newlands	Residential – 10 dwellings	<p>HE notes that despite the recommendations of the HSA, no reference is made in the guidance for NSRA15 to any requirement for archaeological evaluation. We therefore suggest that the views of the Warwickshire County archaeological service are sought on this matter.</p>





Historic England

Our ref: PL – 00751005 & PL-00738722

Your ref:



12 October 2023

FAO: Jacqueline Padbury, Principal Planning Policy Officer



[planning.policy@nuneatonandbedworth.gov.uk](mailto:planning.policy@nuneatonandbedworth.gov.uk)

Dear Madam,

**Re: Nuneaton & Bedworth Borough Plan Review Publication Draft Plan 2021-2039 Consultation, September 2023**

Thank you for consulting Historic England (HE) on the Nuneaton & Bedworth Borough Plan Review Publication Draft Plan - Regulation 19 consultation. We note that this document follows the Preferred Options consultation document, which HE commented on in July 2022.

In relation to this Borough Plan Review Publication document we have the following comments:

**General Comments**

Firstly, HE welcomes that the Plan is accompanied by heritage evidence, namely the “Nuneaton and Bedworth Local Plan Review Heritage Site Assessments”, June 2022, undertaken by Oxford Archaeology. This assesses the impact of development on the significance of designated and non-designated heritage assets and their settings. HE welcomes this approach and is pleased to see that the methodology used is in line with that set out in Historic England’s Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

and that the advice of Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3) has been followed:



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<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

In relation to our specific comments on the relevant proposed allocated sites we have set these out in our accompanying Appendix A and Appendix B to this letter.

With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. Our tabulated comments in the attached Appendices A and B, and your own assessments, highlight a number of non-designated heritage assets that may be affected by the proposed allocations. We recommend that the views of the Warwickshire County Archaeological service, or another specialist archaeological adviser, are sought on these allocations to confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site.

In particular we highlight the proposed Strategic allocations SHA-1, SHA-2, SHA-4, SHA-5, SHA-6, SEA-2, SEA-3, SEA-4, SEA-6 and CEM-1 as sites that would benefit from further discussion with your archaeological adviser, as well as many of the proposed 'Non-strategic Allocations for Housing Land'.

In addition, we note that whilst the Heritage Site Assessments document sets out specific recommendations for minimising harm and maximising enhancement, in some cases these have not been carried through into the relevant policies or guidance contained within the Plan. Specific examples of where this is the case are highlighted within our Appendices A and B. Therefore, although we consider the Plan to demonstrate a positive approach to the historic environment overall, we also consider that there is scope to further improve certain policies/guidance on proposed allocations to ensure that heritage assets will be conserved in a manner appropriate to their significance, in line with NPPF guidance.

## **Specific Comments**

### **Key Issues facing the Borough**

Under the 'Issues associated with the local environment' section on p.9 HE welcomes that heritage at risk is included here, noting that two listed buildings are on Historic England's Building's at Risk Register.

### **Vision**

HE welcomes that the conservation and enhancement of the historic environment is included within the vision set out for Nuneaton and Bedworth in this Regulation 19 Local Plan.





## Strategic Objectives

HE welcomes the inclusion of Objective 7 *“To ensure that new development sustains and enhances the historic .... environment”*.

## Development Strategy

### Strategic Policy DS1 – Sustainable Development

HE welcomes the inclusion in the policy of the requirement for development to sustain and enhance the historic environment, whilst providing mitigation and enhancement.

### Strategic Policy DS4 – Residential allocations

In terms of the proposed Strategic and Non-strategic Allocations for Housing Land, HE notes the accompanying ‘Heritage Site Assessments’ document, which has been prepared in line with our advice contained in HEAN 3 “The Historic Environment and Site Allocations in Local Plans”, 2015.

With regard to specific proposed allocations which have the potential to affect the historic environment please see the accompanying **Appendix A** for our detailed comments on the Strategic Allocations for Housing Land, and **Appendix B** for our detailed comments on the Non-strategic Allocations for Housing Land.

### Strategic Policy DS5 – Employment allocations

In terms of proposed Employment allocations, HE again notes the accompanying ‘Heritage Site Assessments’ document, which has been prepared in line with our advice contained in HEAN 3 “The Historic Environment and Site Allocations in Local Plans”, 2015.

With regard to specific proposed allocations which have the potential to affect the historic environment please see our accompanying **Appendix A** for our detailed comments on the Strategic Employment Allocations.

### Policy TC2 – Nature of Town Centre Growth

HE supports the ‘Development principles’ set out within this policy but would stress that any regeneration proposals within Nuneaton and Bedworth town centres should be fully evidenced and take account of the desirability of sustaining and enhancing the significance of heritage assets.

Therefore, HE supports the policy aspiration to deliver appropriate enhancements in the town centres which will complement existing historic assets and help define the town centres’ sense of place.

For our detailed comments on specific town centre allocations which have the potential to affect the historic environment please see our accompanying **Appendix B**.





### Policy NE1 – Green and Blue Infrastructure

HE welcomes that cultural heritage has been acknowledged in principle as a key part of the green-blue infrastructure of the Nuneaton and Bedworth area. We are also pleased to see that the policy now explicitly recognises the value of the historic environment in contributing to the multi-functionality of green-blue infrastructure via cultural heritage, recreation and tourism through assets such as historic parks, gardens and canals, in line with our comments on the policy contained within the Preferred Options consultation plan.

### Policy NE4 – Managing flood risk and water quality

HE notes that the policy now acknowledges the risks to traditional buildings from flooding, in line with our comments on the policy contained within the Preferred Options consultation plan.

We also note the changes to the policy in respect of the design of sustainable drainage systems and their impact on archaeology, following our comments on the policy contained within the Preferred Options consultation plan.

### Policy NE5 – Landscape Character

HE welcomes the addition of the reference to the historic environment under 'Key characteristics and distinctiveness', in line with HE's comments on the Preferred Options consultation plan.

### Policy BE2 – Renewable and Low Carbon Energy

HE welcomes that the reference to protecting heritage, as part of the balancing exercise the Council will undertake in relation to small-scale wind energy, has now been included within the policy itself, as per our comments on the Preferred Options consultation plan.

### Policy BE3 – Sustainable Design and Construction

HE welcomes the inclusion of a section within the policy on the value of heritage assets as an aid to achieving sustainable development, following our comments on the policy contained within the Preferred Options consultation plan.

### Policy BE4 – Valuing and Conserving our historic environment

HE is pleased to see the inclusion of a specific policy on the historic environment encompassed within this Regulation 19 document and considers that overall the policy sets out a positive strategy for the conservation and enjoyment of the historic environment.





We also welcome that amendments to the policy have been made following our comments on the policy contained within the Preferred Options consultation document such that the policy now refers much more explicitly to the setting of a heritage asset; both within the policy sub-titles and in the first line of section 2. Therefore, we consider that the policy wording is now better aligned to NPPF requirements and terminology, than the version of Policy BE4 proposed by the Preferred Options consultation document.

As with the previous version of Policy BE4, HE welcomes the references to local heritage assets within the supporting policy text and also reference to those assets currently on HE's Heritage at Risk Register and is pleased to see that the Council's list of non-designated heritage assets is currently being reviewed.

### Sustainability Appraisal (SA) Report: Regulation 19 July 2023

HE notes the findings of section 10.11 of the SA Report in relation to SA Topic 10: Cultural Heritage. Whilst we agree that with a few exceptions, the majority of site allocations are not constrained by historic environment considerations, we strongly suggest that Heritage Impact Assessments are undertaken for all proposals that may have potential impacts on designated and non-designated heritage assets. Please see our detailed comments on proposed allocations contained our attached Appendices A and B.

Therefore, whilst we have some detailed comments on specific proposed allocations, it is our view that overall the Regulation 19 Plan demonstrates a positive approach to the historic environment as required by NPPF para. 190 and we consider the Plan to be sound in respect of historic environment issues.

We should like to stress that the above opinion is based on the information provided by the Council in their Regulation19 consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.

We hope that the above comments will assist, but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

*Elizabeth Boden*

Elizabeth Boden (Mrs)  
Historic Environment Planning Adviser  
E-mail: [REDACTED]



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