

Longframlington Parish Neighbourhood Plan

Strategic Environmental Assessment (SEA)

Screening Opinion FINAL

Prepared by the Neighbourhood Planning & Infrastructure Team, Northumberland County Council

14 January 2021

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Summary of Screening Opinion

- 1. Longframlington Parish Council is preparing a neighbourhood plan which defines a settlement boundary, supports rural exception affordable housing which is small scale, supports a vibrant rural economy, supports biodiversity and gives protection to areas of open and green space that are of demonstrable importance to the local community. The Neighbourhood Plan proposes to contain five policies.
- 2. A Habitats Regulations Assessment screening opinion concludes that no significant effect on European sites would arise from the introduction of the planning policies as currently proposed.
- 3. In the opinion of Northumberland County Council, Strategic Environment Assessment of the Longframlington Neighbourhood Plan is **NOT** required for the following reason:
 - The Plan does not allocate sites for development or expressly support further development in the Longframlington Neighbourhood Area other than that which would be supported through current development plan policies or national planning policy. Accordingly, significant positive or negative effects on the environment are considered unlikely to arise as a result of the introduction and implementation of the Neighbourhood Plan.

1. Legislative Background

Neighbourhood Planning and Strategic Environmental Assessment

- 1.1 The legislative framework for neighbourhood planning was created through the Localism Act in 2011. This introduced various changes to the Planning Acts¹ which established discretionary powers that allow parish councils to prepare 'neighbourhood development plans', often just called neighbourhood plans. These are planning policy documents. Once brought into legal force (known as being 'made'), they form part of the statutory development plan. This means that policies in made neighbourhood plans must be used by the local planning authority in the determination of planning applications; and where plans contain policies relevant to the proposed development, a decision must be made in accordance with the policy unless material considerations indicate otherwise. Neighbourhood plans therefore have an important role in decision making on planning applications.
- 1.2 Preparing a neighbourhood plan provides an opportunity for local communities to create locally specific planning policies that can shape and influence the type, scale and design of new development in their local area. They also allow certain protections to be created in policies that prevent development on locally cherished green spaces and policies that support the retention of community facilities.
- 1.3 However, being part of the statutory development plan means that various legal obligations have been created to govern the proper preparation of neighbourhood plans. This includes the requirement for formal consultation and engagement during plan preparation; and the requirement for a neighbourhood plan to be examined by an independent person who must provide the local planning authority with a considered opinion on whether a draft neighbourhood plan meets a range of legal tests. These tests are known collectively as the 'basic conditions' and are set out in Schedule 4B of the Town and Country Planning Act 1990, and in the Neighbourhood Planning (General) Regulations (2012) (as amended).

¹ The Localism Act introduced changes to the Town and Country Planning Act (1990) and the Planning & amp; Compulsory Purchase Act (2004) which, along with various statutory Regulations provide the legal framework allowing neighbourhood plans and orders to be prepared by parish councils.

- 1.4 In the context of Strategic Environmental Assessment (SEA), the basic conditions require, amongst other things, that:
 - the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations;

and that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 1.5. Collectively, it is these two basic conditions that require further detailed consideration to be given to the impact a neighbourhood plan may have on the environment and on protected species and habitats before it can be brought into force. The procedures to be followed in determining whether a plan would be likely to have significant effects on the environment are set out in European Union Directive 2001/42/EC (the SEA Directive), which is transposed into UK legislation through The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.6. Where a plan is judged likely to have significant environmental effects it is necessary to undertake an assessment of those effects in accordance with the processes set out in the SEA Directive and the SEA Regulations. In reaching that judgement on whether significant environmental effects are likely to arise from the introduction and implementation of a neighbourhood plan a process known as 'screening' is required. This establishes whether, in the opinion of a responsible authority, the plan will require further assessment or not. Where a plan requires further assessment, this will result in the need to prepare an environmental report which becomes one of the documents that must be submitted for independent examination alongside the plan.

- 1.7. When considering whether a plan would be likely to have significant environmental effects there are two routes that may lead to a positive conclusion on that question:
 - Firstly, in accordance with Regulation 5(3) of the SEA Regulations, if it has been determined that a plan requires 'appropriate assessment' under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) as a result of its likely impacts on European designated sites, this automatically triggers the need for SEA and the preparation of an environmental report. In such circumstances there is no further requirement to provide a separate screening opinion under the SEA Regulations;
 - Secondly, in accordance with Regulation 9 of the SEA Regulations, the responsible authority must determine whether or not a neighbourhood plan is likely to have significant effects on the environment. This is generally known as a 'screening opinion'. If a screening opinion prepared by a responsible authority concludes that there are likely to be significant environmental effects arising from the implementation of the plan then SEA will be required, including the need to prepare an environmental report.
- 1.8 The County Ecologist has considered whether appropriate assessment under the Habitats Regulations is required for the Longframlington Neighbourhood Plan. An initial screening opinion has been provided confirming that appropriate assessment under the Habitats Regulations is not required.
- 1.9 This report provides a separate screening opinion regarding the environmental effects anticipated to arise from the introduction of the Longframlington Neighbourhood Plan and whether, in the opinion of Northumberland County Council as the responsible authority for the purposes of the SEA Regulations, the Plan would have significant environmental effects such that SEA is required.

2. Longframlington Draft Neighbourhood Plan

The Longframlington Neighbourhood Area

2.1 Longframlington lies on the A697 between Morpeth and Wooler in Northumberland. It is situated at the top of the south-facing side of the Coquet valley. The Neighbourhood Area covers the entire civil parish of Longframlington (figure 1).

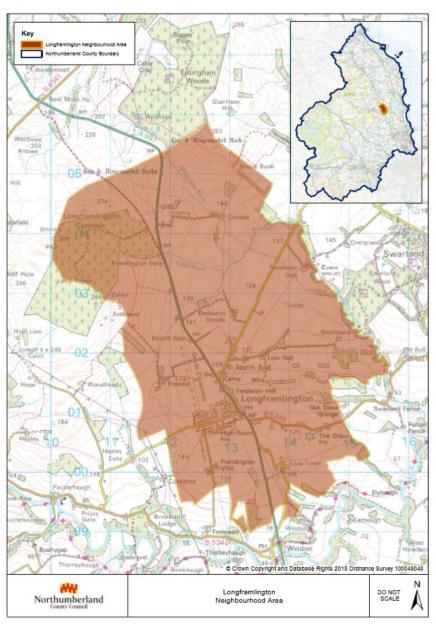


Figure 1. The Longframlington Neighbourhood Area

The Draft Longframlington Neighbourhood Plan Policies

2.2 It is currently proposed that the Plan will contain five policies. The draft policies, shown in full below, are designed to ensure development takes place in sustainable locations, primarily within the settlement of Longframlington; support is given to affordable housing to meet local needs; support is given to development that helps create and sustain a vibrant local economy; net gains in biodiversity are required from development; and protection is given to areas of open space, including Local Green Space where this is of demonstrable importance to the local community.

Policy LNP1: Settlement Boundary

The boundary identified on the Policies Map defines the settlement boundary for Longframlington

Policy LNP2: Housing Development in the Neighbourhood Area

New housing development will be supported within the settlement boundary of Longframlington where the following criteria are met:

- a) suitable and safe access for vehicles, pedestrians and cyclists
- b) incorporate high quality landscaping and deliver a net gain for biodiversity and
- c) do not impact unacceptably on the local landscape or the amenity of local residents.d) provide a mix of housing to meet the needs of young families and older people

Proposals for the delivery of housing to meet a specific identified local need, either on rural exception sites on the edge of the settlement, or within the settlement boundary of Longframlington will be supported.

Proposals for rural exception sites will not be supported in areas which would have a significant adverse effect on important views into and out of the Longframlington as identified on the Policies Map.

Elsewhere in the Neighbourhood Area, new housing will be restricted to those deemed acceptable in the countryside as set out in the NPPF [include info in policy]

Policy LNP3: A Vibrant Rural Economy

The sustainable growth and expansion of the following types of business will be supported subject to policies elsewhere in the Development Plan:

a) the development and diversification of agricultural and other land-based rural business including the provision of well-designed buildings to support that business;

b) new sustainable rural tourism and leisure developments which respect the character of the countryside and deliver net gains for biodiversity;

c) the expansion of home-based businesses where planning permission is required;

d) provision of new, and the expansion of existing, community facilities and businesses including those which provide a community benefit, such as shops, cafes, pubs, restaurants and businesses and enterprises which provide meeting spaces for community benefit;

e) there will be a presumption against the loss of valued community facilities listed below. Planning permission resulting in the loss of any of these valued facilities will not be granted unless it can be demonstrated that the facility is no longer required, no longer financially viable or that an alternative facility can be provided.

Community Facilities to add here

Policy LNP4: Biodiversity and Wildlife

All new development must demonstrate how it delivers net gain for biodiversity. This can be through additional tree planting, hedgerow planting, incorporation of wildlife areas, links to wildlife areas, native planting, provision of nesting boxes for birds, bats, and other wildlife, ensure hedgehog access between dwellings and creating pond habitats.

Policy LNP5: Local Green Spaces

The following sites will be protected as LGS within the village of Longframlington:

[sites to list here – we don't have a list of LGS sites at this stage]

3. Longframlington Environmental Context

Landscape quality

3.1 The Parish lies in the Mid Northumberland National Character Area (NCA12). The Northumberland Landscape Character Assessment (2010) identifies and describes various Landscape Character Types (LCT) across Northumberland within which there are smaller Landscape Character Areas (LCA). Longframlington Parish sits within the Landscape Character Type *38 Lowland Rolling Farmland* which contains the Landscape Character Area (LCA) *38a Longframlington* (Figure 2).²

<figure><figure>

Figure 2. Landscape Character Type in Longframlington Parish

3.2 LCT 38 is a large area of rolling or undulating farmland, stretching from the Tyne Gap to Alnwick. Although there are variations in enclosure, patterns, and tree cover in this landscape, the overall form is relatively continuous. Key characteristics are undulating agricultural landscape with rich soils under predominantly arable cultivation, generally little tree cover, with occasional small-scale woodlands and plantations, medium-scale parliamentary enclosure landscape, field enclosure by hedgerows, with frequent hedgerow trees. It has become fragmented in many places; trunk roads and prominent road alignments exert a strong

https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Landscape%20Green%20Spaces%20Stud ies/1.%20Landscape%20Character/Landscape-Character-Part-A.pdf

² Northumberland Landscape Character Assessment

influence and there are locally important estate influences, with woodland, and estate villages.³

3.3 LCA 38a (Longframlington) is an area which occupies undulating, relatively high ground bordering the coastal plain between the Aln and Coquet valleys. Rectilinear field units are bounded by hedgerows originating from the parliamentary enclosures. Sizeable coniferous plantations can be found around Swarland and north of Shilbottle. Although the last colliery closed in the late 1990s, coal mining was formerly a significant presence in this landscape, with collieries at Shilbottle, Whittle and Longframlington. Although full restoration is yet to have been completed, there is little physical evidence of this industry now. Other former industrial activity included lime and tile manufacturing.⁴

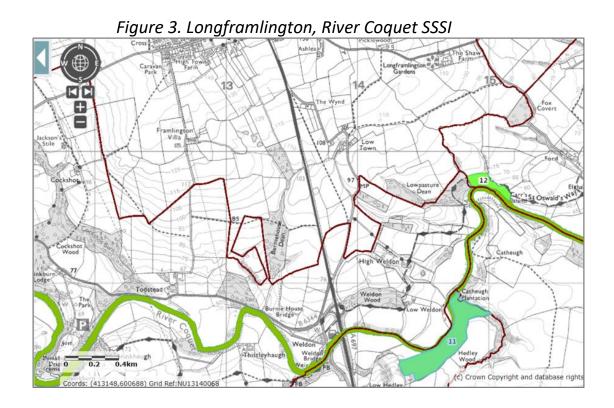
Biodiversity and geodiversity

- 3.4 There are no statutory local nature reserves in the Parish
- 3.5 The River Coquet and Coquet Valley Site of Special Scientific Interest (SSSI) is not located within the Neighbourhood Area, but runs along the southern border of the area. The River Coquet runs about 90km (57 miles) across Northumberland, from its tributaries south of Cheviot summit to reach the sea below Warkworth. As a relatively unmodified fast-flowing upland river supporting characteristic fauna and flora the Coquet is of key significance in the national resource for nature conservation. The river is important for its variations of vegetation, birds, fish and other protected species like the otter and bats. The condition of the section of the SSSI that runs across the southern border of the Neighbourhood Area is described as 'favourable' but as the river flows west it enters an 'unfavourable, recovering' condition (Figure 3).⁵

³ Ibid

⁴ Ibid

⁵<u>https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000052&SiteName=&countyCode</u> =32&responsiblePerson=&SeaArea=&IFCAArea=



Heritage Assets

3.6 There are 39 designated heritage assets in Longframlington Parish. The location of the majority of these are shown on the map below (Figure 4) where they are plotted as blue triangles. Longframlington settlement is highlighted with an orange circle. There is only one Grade 1 listed building in the Parish (Church of St Mary, Rothbury Road). Cragside Park and Garden is also Grade 1 listed and while it is not within the Neighbourhood Area its setting has the potential to be affected by development towards the northern and western boundaries of the Parish. One Grade II* listed building (Newmoor Hall), thirty five Grade II listed buildings and one scheduled monument (Cairnfield including ring cairn and cup and ring marked rocks) are located in the Neighbourhood Area.⁶

⁶ National Heritage List for England <u>https://historicengland.org.uk/listing/the-list/</u>



Figure 4. Designated Heritage Assets in Longframlington

3.7 There are no heritage assets within the Parish that are registered as being at risk.

Water

Flood Risk

3.8 The risk of flooding in the Longframlington Neighbourhood Area is low. There are no water courses flowing through the Neighbourhood Area that present a high flood risk. The River Coquet flows outside the southern boundary of the neighbourhood plan area. (Figure 5)



Figure 5. Flood risk in Longframlington Neighbourhood Area⁷

Water availability

3.9 The Kielder Water Resource Zone (WRZ) serves the Neighbourhood Area. There is a large surplus of supply over demand in the Kielder WRZ and the area is not classed as seriously water stressed.⁸

Water quality

3.10 Swarland Burn catchment, including Millstone Burn and Gate Burn in the north of the Neighbourhood Area and Fence Burn tributaries, to the north east of Longframlington settlement, all flow to the River Coquet, moving south eastwards through the Neighbourhood Area. The River Coquet is just outside the southern border of the Neighbourhood Area (Figure 6). Water quality for the catchment area was classed as 'good' for each year 2013 to 2016 but dropped to "moderate" in the latest 2019 data. There is no information publicised yet to show the reason why the water quality has gone from "good" to "moderate" in 2019.⁹

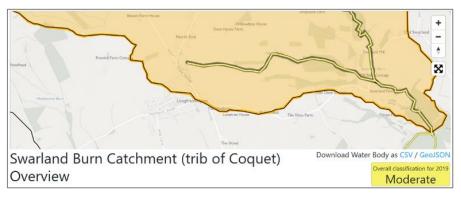
⁷ Environment Agency Flood Risk

https://flood-warning-information.service.gov.uk/long-term-flood-risk/map

 ⁸ Northumbrian Water <u>https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/</u>
 ⁹ Swarland Burn Catchment (trib of Coquet) Overview, Environment Agency

https://environment.data.gov.uk/catchment-planning/WaterBody/GB103022076660

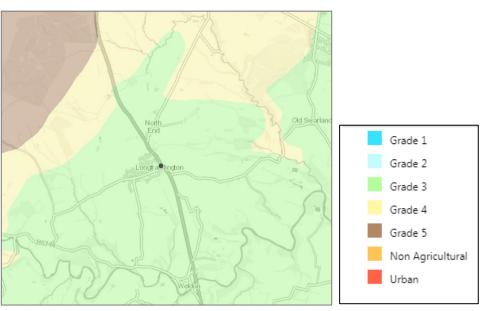
Figure 6. Part of Swarland Burn Catchment, inc Fence Burn



Agricultural land

3.11 The Agricultural Land Classification classifies land into five grades. Grade one is best quality and grade five is poorest quality. The majority of agricultural land in the Neighbourhood Area is grade 3, i.e. good to moderate quality agricultural land but decreases to 4 and 5 northwards through the neighbourhood area (Figure 7).¹⁰

Figure 7. Agricultural Land Classification in Longframlington Neighbourhood Area



¹⁰ DEFRA Data Services

https://environment.data.gov.uk/DefraDataDownload/?mapService=NE/AgriculturalLandClassificationProvisionalEngland&Mode=spatial

Pollution

Air pollution

3.12 Within the County, since 2007, there has been a trend of decreasing nitrogen dioxide and particulate levels at monitoring stations. As of November 2019, the Longframlington Neighbourhood Area has no recorded Air Quality Management Areas (AQMAs), and air quality is not automatically monitored anywhere within the Neighbourhood Area as part of the annual screening process carried out by Northumberland County Council.¹¹ There are no significant and tangible air quality issues in the Neighbourhood Area.

Water pollution

3.13 There are no Groundwater Source Protection Zones in the area indicating that there is little risk of contamination from activities that might cause groundwater pollution in the area.

¹¹ 2019 Air Quality Annual Status Report (ASR), Northumberland County Council <u>https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Public-</u> <u>Protection/Pollution/2019-LAQM-Annual-Status-Report.pdf</u>

4. Assessment

4.1 Criteria for determining the likely significance of effects on the environment arising from plans and programmes are set out in Annex II of the SEA Directive. These have been used in this screening opinion to determine whether the Longframlington Neighbourhood Plan is likely to have a significant effect on the environment. The criteria are split into two categories: those relating to the characteristics of the Plan and those relating to the characteristics of the effects and areas likely to be affected.¹² An assessment of the Longframlington Neighbourhood Plan against these criteria is set out in Table 1 below.

Table 1: Assessment of the likely significance of effects on the environment
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Criteria	Assessment			
The characteristics of the plan, having regard to:				
(a) the degree to which the plan	The Neighbourhood Plan does not seek to allocate			
sets a framework for projects	land for development and does not set a framework			
and other activities, either with	to expressly support additional development beyond			
regard to the location, nature,	that which would otherwise be supported by existing			
size and operating conditions or	development plan policy or through national planning			
by allocating resources.	policy. It therefore does not set a framework for the			
	location, nature, size or operating conditions for			
	projects or other activities and does not allocate			
	resources.			

¹² Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment. Annex II Criteria for determining the likely significance of effects referred to in Article 3(5) <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN</u>

Criteria	Assessment		
The characteristics of the plan, having regard to:			
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy.	The Neighbourhood Plan must be in general conformity with the strategic policies in the existing development plan, and, in accordance with national guidance, should have regard to policies proposed in the emerging Northumberland Local Plan. It is a discreet document that does not directly seek to influence other plans and programmes.		
(c) the relevance of the plan for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The Neighbourhood Plan does not seek to allocate land for development. Its relevance for the integration of environmental considerations is therefore limited. The Plan would support sustainable development and would support the delivery of net gains in biodiversity achieved through sustainable development.		
(d) environmental problems relevant to the plan	The environmental context for the area described elsewhere in this Screening Opinion reveals no particular environmental problems of any relevance to the Plan.		
(e) the relevance of the plan for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	Neighbourhood plans cannot contain policies or proposals in respect of waste management since this is 'excluded development' by virtue of the Planning Acts. The Plan has no particular relevance for the implementation of other Community legislation.		

Criteria	Assessment
	ts and of the area likely to be affected, having
regard to:	The Neighbourbood Plan doos not sook to
(a) the probability, duration, frequency and reversibility of the effects.	The Neighbourhood Plan does not seek to allocate land for development and does not expressly support additional development beyond that which would otherwise be supported by existing development plan policy or through national planning policy. It is therefore not anticipated that any significant additional positive or negative effects are likely to arise from the implementation of the Plan.
(b) the cumulative nature of the effects	The Neighbourhood Plan does not seek to allocate land for development and does not expressly support additional development beyond that which would otherwise be supported by existing development plan policy or through national planning policy. It is therefore not anticipated that any significant positive or negative effects are likely to arise from the implementation of the Plan, and no cumulative impact is predicted.
(c) the transboundary nature of the effects	The Neighbourhood Plan does not seek to allocate land for development and does not expressly support additional development beyond that which would otherwise be supported by existing development plan policy or through national planning policy. It is therefore not anticipated that any significant positive or negative effects are likely to arise from the implementation of the Plan and no transboundary effects are predicted.
(d) the risks to human health or the environment.	The Neighbourhood Plan does not seek to allocate land for development and does not expressly support additional development beyond that which would otherwise be supported by existing development plan policy or through national planning policy. It is therefore not anticipated that any significant positive or negative effects are likely to arise from the

	implementation of the Plan, and no significant risks to human health or the environment are predicted.			
Criteria	Assessment			
The characteristics of the effects and of the area likely to be affected, having regard to:				
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The policies in the Plan apply solely to development proposed in the Neighbourhood Area. The magnitude and spatial extent of any effects will be relatively small.			
 (f) the value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land-use; the effects on areas or landscapes which have a recognised national, Community or international protection status 	The Neighbourhood Plan does not seek to allocate land for development and does not expressly support additional development beyond that which would otherwise be supported by existing development plan policy or through national planning policy. It is therefore not anticipated that any significant positive or negative effects are likely to arise from the implementation of the Plan. The Longframlington Neighbourhood Area does contain some designated heritage assets and there are nationally important ecological designations close to the boundaries of the Neighbourhood Area. This makes the area and its setting valued, but also sensitive and potentially vulnerable to disturbance and to change. However, the general condition of these designated areas and assets is favourable or improving and none are known to be at risk. The risk to their status from implementation of the Plan is judged to be low because the scale and form of development supported by the Plan is generally very small and focussed on the existing built-up area of Longframlington village. The policies in the Longframlington Neighbourhood Plan seek to support sustainable development. The value and vulnerability of the Neighbourhood Area in regard to the status of environmental, cultural and heritage assets would not be significant in relation to changes supported by the Plan.			

5. Conclusions

- 5.1 The potential positive or negative effects on the environment of implementing the Longframlington Neighbourhood Plan have been assessed in this Screening Opinion having regard to the assessment process set out in the SEA Directive and in accordance with the SEA Regulations.
- 5.2 The Plan covers a small area in Mid Northumberland. The policies set out in the draft Plan are designed to support sustainable development largely in accordance with current national planning policy.
- 5.3 Significant environmental effects are considered unlikely to arise through the implementation of the Plan, which does not allocate land for development or expressly support new development other than that which would be expected to receive support through current national planning policy.
- 5.4 On the basis of this assessment the following conclusion has been reached by Northumberland County Council, having regard to the criteria set out in Schedule 1 of the SEA Regulations:

Longframlington Neighbourhood Plan is unlikely to have any significant positive or negative effects on the environment such that further assessment would be required under The Environmental Assessment of Plans and Programmes Regulations 2004 for the following reason:

- The Plan covers a relatively small area and does not allocate sites for development or expressly support further development in the Longframlington Neighbourhood Area other than that which would be supported through current development plan policies or national planning policy. Accordingly, significant positive or negative effects on the environment are considered unlikely to arise as a result of the introduction and implementation of the Neighbourhood Plan.
- 5.5 This conclusion is supported by the statutory consultation bodies.

Appendix 1: Responses received from Consultation Bodies



Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Additionally, Natural England has the following comments on this draft neighbourhood plan:

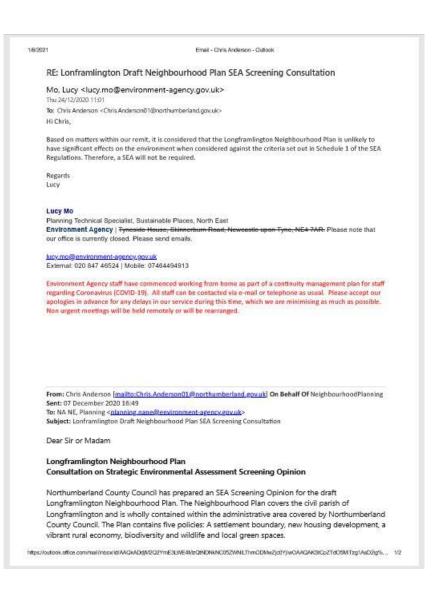
Policy LNP4: Biodiversity and Wildlife - We welcome the specific reference to net gains for biodiversity, but given that biodiversity net gain will become mandatory when the Environment Bill completes its passage through parliament, we advise that this policy is made stronger to reflect this position. We would suggest rewording the policy state: "All new development must demonstrate how it delivers *measurable* net gains for biodiversity".

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter <u>only</u> please contact nick.lightfoot@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

Yours sincerely

Nick Lightfoot Northumbria Area Team



Sir/Madam Neighbourhood Planning	Direct Dial: 07880 717925
Northumberland County Council Neighbourhood Planning Team County Hall	Our ref: PL00730102
Morpeth	
Northumberland	
NE61 2EF	15 December 2020
Dear Sir/Madam Neighbourhood Planning	
Environmental Assessment Regulations 20	004: Regulation 9
Longframlington Neighbourhood Plan: SE/	
Thank you for consulting Historic England on t	
Assessment (SEA) Screening Opinion. As the historic environment, we are pleased to offer o	
Based on the analysis set out in the Screening	Oninion, and within the areas of
interest to Historic England, we agree that the	
significant environmental effects and, therefor	
 this view we have taken the following factors in The plan area contains a number of heri 	
 The plan area comains a number of heri buildings and the potential for non-desig 	
 Heritage assets are fragile and irreplace 	
 through development both directly and in The plan is not expected to allocate sites 	
 The plan is not expected to allocate sites 	s for development.
As such, from the perspective of our area of in	
can be screened out as it is unlikely to result in (positive or negative). However, the views of the stress of th	
be taken into account before you conclude on	
Regulation 11 of the above Regulations, I look determination in this case.	forward to receiving a copy of your
We reserve the right to review our opinion sho	
content and direction. Please do not hesitate t relating to our comments or would like any fur	
Yours sincerely.	
Jules Brown	
BESSIE SURTEES HOUSE 41-44 SANDHILL	
Telephone 0191 2 HistoricEngland	op 1266 Stonewall