



Historic England

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Our ref:

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HR4 0XH
2022

15 September

Dear Vicky

**HEREFORDSHIRE MINERALS AND WASTE PLAN INFORMAL CONSULTATION
ON HERITAGE IMPACT ASSESSMENTS AND PRE-EXAMINATION MAIN
MODIFICATIONS AND MINOR CHANGES**

Thank you for the information received on 25 August 2022 in my colleague's absence. I refer also to the virtual meeting on 6 September 2022 between Kevin Singleton, yourself and me where we discussed the information at a general level and clarified what was being sought at this stage.

We agreed that I would respond by 16 September 2022 highlighting areas of agreement/disagreement.

I can confirm that the information we are looking at are Pre-Examination MWLP Documents:

- D3.71 - Heritage Impact Assessment (HIA) Leinthall;
- D3.72 - HIA Shobdon;
- D3.73 - HIA Upper Lyde;
- D3.74 - HIA Wellington; and,
- D3.75 - Schedule of Main modifications and minor changes proposed pre-Examination.



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In terms of the HIA's we will need further time to consider these but would be able to respond with clarity in the next few weeks and certainly ahead of the hearing statement deadline of 7 October 2022.

In respect of the main modifications, some proposals are in line with advice we have provided at the earlier consultation stages but we continue to have concern about the wording used for heritage assets in the site criteria sections: 'Need to demonstrate less than substantial harm on heritage asset(s) and their setting(s)...'. In terms of impact on heritage assets and settings, in respect of a site allocation in a Plan, the Plan should be able to demonstrate that a site is developable and deliverable in relation to the historic environment.

At present, the wording suggests that the Plan cannot demonstrate that the site it is putting forward for possible development is compatible with the Council's own policies for the protection of the historic environment or the requirements set out in the NPPF.

In terms of the historic environment work that has been undertaken in respect of the Plan we expect this could be discussed in the next few weeks with a view to setting any alternative option for wording out in a Statement of Common Ground if that was agreeable to the Council.

We would also be happy to include any site allocation matters through a Statement of Common Ground if that would be an agreeable approach to yourselves.

For your information, we intend on advising the Programme Officer that we wish to attend the EIP at this stage but would be happy to continue conversations as set out above and clarify matters further through any hearing statement that we submit and at any relevant hearing session in due course.

I will be on leave 23-30 September 2022 but we will be working as a team in Kezia's absence to continue the conversations outlined above so there will be other HE colleagues who will be supporting on this Plan for that week I am not around.

I will be around next Tuesday onwards if you have any immediate queries.

Yours sincerely,

Rosamund Worrall

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