



Mr Chris Tyler
Uttlesford District Council
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Direct Dial: 07554 437321

Our ref: PL00799668

1 September 2025

Dear Mr Tyler

Town & Country Planning Act 1990 (as amended), Town & Country Planning (Environmental Impact Assessment) Regulations 2017

**LAND NORTH OF BIRCHANGER AND SOUTHOF STANSTEAD, BIRCHANGER
ESSEX**

Environmental Assessment (EIA) Scoping Opinion: UTT/25/2203/SO

Thank you for consulting us regarding a Scoping Opinion regarding proposed development at the above site.

Planning permission is sought for development of the site for up to 520 new homes (Use Class C3) and up to 20,000 sqm of commercial floor space with public open space, new access, active travel routes between the Birchanger Site and Stansted Mountfitchet and Sustainable Urban Drainage System.

We note that whilst there are no designated heritage assets within the application site, there are however a number of listed buildings within the proximity of the development site, including and pertinent to Historic England's statutory remit - Church of St Mary, Birchanger listed grade II* and Church of St Mary the Virgin, Stanstead- listed at grade II*. There is potential therefore for the settings of these and other listed buildings to be affected.

We understand that on this occasion that Heritage is scoped out of the EIA on the basis of pre-application work carried out which the applicant claims demonstrates that the effects would be insignificant.

Whilst it is ultimately for the local planning authority to determine the scope of the EIA, we would nevertheless expect to see a thorough and robust assessment of the potential impact that the development is likely to have upon the historic environment included as part of the planning application as required by the National Planning Policy Framework (NPPF) - whether that is as part of the EIA or as standalone exercise.



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We recommend that any heritage assessment should be carried out in accordance with established policy and guidance, including the *National Planning Policy Framework* and *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*.

The latter provides a thorough discussion of setting and methods for considering the impact of development. This should assess the significance of heritage assets, their settings and the contribution their settings make to the significance, and to assess the impact of the proposed development on the significance of the designated heritage assets.

The requirements for evaluation should also be agreed in consultation with archaeological staff at Essex County Council's Historic Environment Team.

They should take the lead on advising on the identification, assessment and scope for mitigation on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk).

We also strongly recommend that you involve your in-house Conservation Officer in the development of the assessment.

The LPA's specialist staff are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and 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 heritage assets.

It is important that the impact of a development is well illustrated, and this can be achieved through photomontages, visualisations or similar techniques.

We would also expect the EIA to consider the potential impacts on any non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make a notable contribution to the character and local distinctiveness of an area and its sense of place.

Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) to be a matter of qualitative and expert judgement which cannot be achieved solely by use of





systematic matrices or scoring systems.

Historic England therefore recommends that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the Heritage Assessment.

The Heritage Assessment should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

The setting of heritage assets is not, however, just restricted to visual impacts. Other factors should also be considered in particular noise, light, traffic and assessments. Where relevant, Heritage should also be cross-referenced to other relevant section of the Scope of Technical Work chapter, and we advise that all supporting technical heritage information (e.g. desk-based assessments, reports etc.) are included as appendices.

Paragraph 207 of the National Planning Policy Framework states that 'where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

This development could also affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

In addition, the assessment should consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Finally, we should like to stress that this response is based on the information provided in this consultation. To avoid any doubt, this does not affect our obligation to provide





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further advice and, potentially, to object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.

If you have any queries regarding the above, or would like to discuss anything further, please contact me.

Yours sincerely,

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