

## STATEMENT OF COMMON GROUND

13 APRIL 2012

The following statement has been prepared by **Purbeck District Council** (the Council) and **English Heritage** (EH)

### **EH late comments in March 2012 to the Proposed Changes to Pre-Submission Core Strategy:**

EH missed the formal consultation period, but have still submitted some comments. The Council has tried to address these comments as follows:

#### **Policy ELS**

EH comments: The scheduling of the Former Royal Navy Cordite Factory at Holton Heath and presence of several listed buildings demonstrates the national historic significance of this rare survival of a purpose built Royal Navy munitions factory constructed during WW1. However the policy implies substantial new development on site with no indication of whether such activity is compatible with the sites heritage status. Are you able to say how the historic importance of the site has informed the allocation and will inform future change? How will the heritage assets be conserved in a manner appropriate to their significance? Paragraph 6.6.3 refers to an ecological assessment informing the "nature, scale and location of employment". Might an assessment of the historic environment (HE) do likewise? Relevant national planning policy - Draft NPPF para 24,176, 177: PPS5

#### Council response:

Propose that para 6.6.3 is amended adding 'and heritage impact' after 'ecological', and adding 'or heritage asset' after 'European site', resolving EH concerns.

#### **Policy REN**

EH comments: Understandably this policy includes a number of standard caveats. Might we also advise reference to *the need to avoid harm to the significance of heritage assets and their settings*, in accordance with PPS5 Policy HE1.

#### Council response:

Propose the addition of the bullet: 'It avoids causing harm to the significance and setting of heritage assets', resolving EH concerns.

#### **Sustaining Purbeck's HE (heritage strategy) (section 8.17 onwards)**

There are 3 important components of a positive and proactive strategy for the conservation of the HE currently missing from the Core Strategy.

**1. Heritage at Risk** - PPS5 Policy HE2.3 makes clear the need to use evidence of the historic environment's condition. And PPS5 HE3.1 states that local plans should provide a proactive conservation strategy. Whilst we welcome your intention to complete conservation area appraisals and management plans, the CS makes no reference to the 69 Scheduled Monuments on the National Heritage At Risk Register. Might the council refer to the intention to reduce on an ongoing basis the number of heritage assets at risk over the plan period?

**2. Historic Environment Record (HER)** - an up-to-date and available HER is essential to inform the appropriate consideration, and therefore sustainable conservation of the HE. Could we suggest reference to the HER in the evidence base; the intention (at section 8.17) to maintain an up-to-date and available HER, and ; refer to the HER at paragraph 8.17.5.

Relevant national planning policy - PPS5 HE2.2; Draft NPPF paragraph 37

**3. Non designated assets/local list** - the importance of non designated heritage assets is clear. The CS acknowledges the lack of a local list in Purbeck. Might the council refer to the intention to prepare such a list? Relevant national planning policy - PPS5 and Practice Guide paragraph 27

Council response:

- Point 1 – add into paragraph 8.17.4 ‘Through use of these tools positive steps will be taken to secure the conservation and enhancement of the District’s historic environment and landscape. Areas of action include reduction in the number of assets considered to be ‘at risk’ of loss or deterioration,’ after ‘service providers.’, resolving EH concerns.
- Point 2 - add to the end of paragraph 8.17.3; ‘The Dorset Historic Environment Record (maintained by Dorset County Council) is an important source of information relating to the historic environment, sites and designations.’ In paragraph 8.17.5 add ‘Dorset Historic Environment Record’ to the list of sources, resolving EH concerns.
- Point 3 – There is no current commitment to production of a Local List therefore it would be inappropriate to state this as an intention.

**Policy LHH**

PPS5 HE3.1 and the definition of *conservation* at Annex 2 clarifies when the enhancement of the HE would be appropriate. To accord with national planning policy "wherever possible" referred to in Policy LHH should be replaced with "wherever appropriate".

### Council response:

Propose that text will be amended as suggested (i.e. 'appropriate' in place of 'possible') , resolving EH concerns.

## **Representations to the Pre-Submission Core Strategy (November 2010)**

### **Para 8.17.4**

EH commented: Welcome reassurance provided, but this relates to Development Policies section, rather than Spatial Strategy section. How the ambitions are to be achieved needs further elaboration. Currently too few indicators relating to historic environment. The following to be addressed: heritage assets at risk, an updated & accessible Historic Environment Record, a local list, up-to-date Conservation Appraisal & Management Plans, village design statements, areas for heritage-led regeneration, public realm improvements in historic areas, appropriate highway works, conservation of setting & integrity of heritage assets at Holton Heath & Winfrith, identifying areas of potential archaeological interest, how Green Infrastructure planning, a community Infrastructure Levy &/or S106 can contribute to maintaining & enhancing heritage assets.

### Council Response

Assets at risk, the HER, Holton Heath are addressed above. Text added, into para 8.17.4 to follow that proposed in answer to point 1, comment 3 above: , 'securing sensitive public realm and highways improvements, input into production of design statements by local communities and identifying opportunities for heritage led regeneration.' Add the text in para 8.17.3: 'Preparation of such a list will be considered in the future.' after 'undesigned heritage assets.', resolving EH concerns.

## **LHH: Landscape, Historic Environment and Heritage**

EH comments: Currently policy relates to proposals for development. A historic environment strategy in CS needs to be more proactive. The exemptions listed should be consistent with guidance provided by PPS5, but should not repeat this. Need to develop a clear view of what needs to be achieved in relation to Purbeck's cultural heritage & consider how this will be delivered.

### Council Response

The Council amended Policy LHH of the Proposed Changes to resolve these concerns. Reference is made to the freestanding Purbeck Heritage Strategy. The policy has been amended to remove text referring to 'exemptions'.

**Other Comments:**

EH comments: Lack of reference to spatial heritage concerns & how these should be mapped. Chapter 7 should detail spatial heritage concerns & how these should be mapped. CS should respond to heritage assets & demonstrate an appropriate response to PPS5 in order to achieve a clear, effective & sound CS. Emphasises the importance of considering both natural and historic environment, many features of which can be included & therefore managed via green infrastructure Planning. The SE Dorset Green Infrastructure Plan provides useful local reference. & its historic environment strategy should develop a clear view of what needs to be achieved in relation to Purbeck's cultural heritage & consider how this can be delivered. Make reference to the historic environment in the plan.

**Council response:**

The Council amended Paras 2.14 and 2.15 of the Proposed Changes to resolve these concerns. The paras detail differences in the characteristics of the historic built environment within different spatial areas in Purbeck. The Purbeck Heritage Strategy is also referenced which details various heritage concerns and ways in which they might be addressed.