From: Sent: To: Subject: Attachments: Stuart, David 22 June 2018 08:59 Ed Gerry; Planning Policy NDDC Pimperne Neighbourhood Plan Pimperne Neighbourhood Plan

Dear Ed

Many thanks for the consultation below.

I am working at home for a couple of days and am having difficulty gaining remote access to anything on the internet (for whatever reason). This means I cannot access the documents on the Council's website concerning this consultation. Matters may rectify themselves at some point during today but if not I suspect proper consideration of the submission will have to wait until I am in the office again on Monday.

In the meantime I attach a copy of our Regulation 14 Pre-Submission consultation response. You will see that it highlights the desirability of further evidence/clarification concerning the proposed site allocations but essentially is willing to defer to your authority on the outcome of those exercises. At the same time it probably behoves us to review the submission documents to be able to reaffirm that that is our position, which brings us back to my point above.

Apologies for all this confusion and the inconvenience to you. I'll be in touch again as soon as I can.

Kind regards

David

David Stuart | Historic Places Adviser South West

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From: Ed Gerry Sent: 11 May 2018 09:47 Subject: Pimperne Neighbourhood Plan Dear Sir/Madam,

Town and Country Planning, England: Neighbourhood Planning (General) Regulations 2012 (as amended)

In accordance with Regulation 16(b) of the above, I am notifying you as a consultation body referred to in the **Pimperne Neighbourhood Plan** consultation statement that the plan proposal has been received by North Dorset District Council for submission to examination.

The proposed plan may be viewed from **11 May** to **22 June 2018** at:

- www.dorsetforyou.gov.uk/planning/north-dorset/planning-policy
- North Dorset District Council Offices, Nordon Lodge, Salisbury Road, Blandford Forum, DT11 7LL (8.45am to 5.00pm Monday to Thursday and 8.45am to 4.00pm on Friday).
- Blandford Library, The Tabernacle, Blandford Forum, Dorset, DT11 7DW (during normal opening hours)

Response forms are available on the District Council's website (details above) or on request from the Planning Policy Team (01258 484201). The deadline for responding to the consultation is **4pm** on **22 June 2018**. Response forms should be sent to:

- planningpolicy@north-dorset.gov.uk OR
- Planning Policy Team (North Dorset), South Walks House, South Walks Road, Dorchester, Dorset, DT1 1UZ

Any comments may include a request to be notified of the District Council's decision under Regulation 19 in relation to the neighbourhood plan. All comments will be made publicly available.

Kind regards,

Edward Gerry Planning Policy Team Leader

Dorset Councils Partnership serving:

North Dorset District Council, West Dorset District Council and Weymouth & Portland Borough Council

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Kath Oxlee Pimperne Parish Council 13 St Peter's Close Pimperne Dorset Our ref: PL00040236 Your ref:

Telephone

<u>Via email</u>

15th December 2017

Dear Ms Oxlee

NEIGHBOURHOOD AREA CONSULTATION – PIMPERNE

Thank you for your Regulation 14 consultation on the pre-submission version of the Pimperne Neighbourhood Plan.

The focus of our attention is on Policy MHN: Meeting Housing Needs which proposes allocating 40 – 45 additional homes on three sites identified on Map 5 and referred to as policies HSA1, 2 & 3. We have written previously highlighting the need for evidence to demonstrate that allocation sites can be developed without causing harm to designated heritage assets or that, in response to a site options evaluation exercise, those sites chosen can be developed with minimal harm through mitigation or other measures. I attach copies of that correspondence for information.

We are aware that the Plan area contains relatively few designated heritage assets but that these are considered of value by the community and key aspects of local historic character – such as views along Church Road and to and from the Grade II* St Peter's Church (Policy LC) - are specifically identified to ensure that they are not harmed by development. The Church is identified as the most notable Listed Building in the SEA Report (p10).

The area also contains a Conservation Area which is currently without an Appraisal and Management Plan (although we note that these are apparently planned for early 2018 – SEA Report, p10). Given the location of the proposed sites the need for evidence on the setting of the conservation area is particularly relevant.

Pages 21 – 27 of the Plan and the SEA Pre-Submission Stage Report set out the methodology that has been used to assess the proposed sites in terms of their potential for impact on relevant designated heritage assets. This is supported by advice from North



Historic England,



Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available. Dorset District Council's conservation team in an email of November last year whose involvement we encouraged and to whom we would be prepared to defer.

This advice identifies that site HSA1 (land east of Franwell Industrial Estate) has relationships with a number of designated heritage assets and identifies that care will need to be given to the nature of any development to ensure harmful impacts do not arise. From this it seems reasonable to conclude that development in principle is acceptable but that evidence will be needed to support the location, numbers and design of any proposals.

Advice on site HSA₂ (land north of Manor Farm Close) refers to the sensitivity of the setting of the conservation area and that limited development of less than 25 units would be likely to be more successful. Again, it seems reasonable to infer that allocation in principle is acceptable but that evidence to substantiate specific development proposals would be necessary.

There appears to be no advice on site HSA₃ (land west of Old Bakery Close).

The SEA Report has assessed each site against heritage receptors (Table 5) and produced outcomes of impacts on heritage significance arising from policy MHN in Table 8a. This concludes that impacts will be "uncertain", although Table 9a when looking at the impacts of the proposed housing sites then concludes that they will be "neutral" as does Table 10 but without substantiation. Table 9a reiterates the need for careful design but does not provide additional information which might demonstrate that the sites can each deliver the 15 houses in whatever form and with whatever mitigation without causing harm to the heritage assets identified. (Note: there is reference to an Options Stage Heritage Appraisal but this has not been provided and we could not find it on the Plan website)

In summation, while the individual site allocation policies set out criteria and conditions which any development would need to address it is not clear how these are an informed response to an understanding of the relevant heritage considerations capable if implemented of avoiding harm and successfully delivering the development intended.

The gaps in the evidence base can no doubt be readily filled and we remain content to defer to the advice and local knowledge of the Council's conservation team in its assessment of the heritage evidence and suitability of the sites and policies for them. We would therefore encourage further engagement with the Council as part of the current exercise to help ensure that there are no outstanding heritage issues at the Plan's Submission stage.

Otherwise, we congratulate your community on its Plan and welcome its provisions for the protection and enhancement of the area's distinctive historic character.

Yours sincerely

David Stuart Historic Places Adviser





Stonewall DIVERSITY CHAMPION

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From:	Stuart, David
Sent:	15 December 2017 14:22
То:	pimperne@dorset-aptc.gov.uk
Cc:	Ed Gerry; Jen Nixon
Subject:	Pimperne Neighbourhood Plan
Attachments:	RE: Pimperne Neighbourhood Plan Options Consultation; RE: Strategic
	Environmental Assessment (SEA) scoping consultation: Pimperne; Pimperne NP, Reg
	14 cons, 15.12.17doc

Dear Kath Oxlee

Thank you for your Regulation 14 consultation on the Pimperne Neighbourhood Plan. Please find attached our letter of response together with previous correspondence for information.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West

Historic England | https://historicengland.org.uk/southwest

From: Pimperne Parish Council [mailto:pimperne@dorset-aptc.gov.uk]
Sent: 16 November 2017 17:22
To: Stuart, David
Subject: Pimperne Neighbourhood Plan

Dear Mr Stuart

Please find attached letter, draft plan and SEA as detailed.

Kind Regards

Kath Oxlee Clerk, Pimperne Parish Council

From:	Stuart, David
Sent:	25 October 2016 14:59
То:	pimperne@dorset-aptc.gov.uk
Cc:	Ed Gerry; Kevin Morris
Subject:	RE: Pimperne Neighbourhood Plan Options Consultation

Dear Sir/Madam

Thank you for your consultation on the Pimperne Neighbourhood Plan Options Draft and the accompanying SEA Options Stage Report.

We are pleased to note the extent to which the community is keen to protect and enhance its historic environment and how is used an understanding of the distinctive character of the area to inform emergent policies.

Our focus is on the intention to allocate sites for development and in previous advice on the preparation of the SEA we drew attention to the need to understand the significance of relevant designated heritage assets in order to be able to demonstrate, where appropriate, that site allocations would not cause them harm.

The basis for the evaluation of the various sites identified as potential housing (and employment) sites is summarised in Table 9 of the SEA report. This is clear where it does identify heritage assets in need of consideration but does not reveal the methodology which has been used to determine those sites where no implications exist. What does "not likely to impact on settings of nearby assets" actually mean, for example, and while there may be "no heritage assets within or nearby" what is meant by "nearby" and on what basis can it safely be concluded from this that no harm will occur?

We are conscious that the evidence to substantiate conclusions in the preparation of the Plan should be proportionate and given that much work has clearly been undertaken do not envisage that addressing these gaps should be an onerous task. It may be information already gathered which only needs to be expressed in further detail. Equally, we note that there was to be liaison with the conservation team at North Dorset District Council in the site evaluation process and its confirmation of a "clean bill of health" for the proposed sites will provide sufficient reassurance as to their suitability from a heritage perspective.

At the same time it is important that we highlight the undesirability of inadvertently carrying forward within the Plan any hostage to fortune site allocations which subsequently reveal significant heritage issues when specific development proposals are being prepared. In this respect it should be remembered that as well as satisfying SEA requirements the Plan needs to demonstrate conformity with heritage protection and enhancement policies in the Local Plan and National Planning Policy Framework.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West

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From: Pimperne Parish Council [mailto:pimperne@dorset-aptc.gov.uk] Sent: 23 September 2016 09:28

To:

Subject: Pimperne Neighbourhood Plan Options Consultation

Dear Consultee

Pimperne Parish Council is progressing with work on a neighbourhood plan. Having undertaken a household questionnaire and other evidence gathering, from which a vision and objectives were drafted, and then undertaken a scoping consultation for a Strategic Environmental Assessment, the Neighbourhood Planning Group is now in a position where it is considering possible site allocations for inclusion in the plan, and has identified a number of options for consultation with residents. The various material used as part of this consultation has been uploaded to the website <u>www.pimperne.org.uk</u> on the Neighbourhood Planning page.

As part of this consultation the working group would like feedback from organisations such as yours on the site options, the strategic environmental assessment and in particular the assessment methods used, and would welcome any advice you would like to give on the other material have produced.

We would appreciate a response within 4 weeks if at all possible (22 October), following which the group will meet to consider all responses, prior to drafting their neighbourhood plan for consultation.

Kind regards

Bryn MacGregor Clerk, Pimperne Parish Council

On behalf of the Neighbourhood Planning Group

From:	Stuart, David
Sent: To:	05 July 2016 10:28 Jo Witherden; Ed Gerry
Cc:	Ed Gerry; Kevin Morris
Subject:	RE: Strategic Environmental Assessment (SEA) scoping consultation: Pimperne

Dear Jo

Thank you for this consultation on the Pimperne Neighbourhood Plan SEA Scoping. I can summarise our response as follows:

- 1. We are happy to leave a decision on whether an SEA is actually required to the local planning authority. But given that the Plan intends to allocate sites and the low threshold at which "significant environmental effects" can be deemed likely we would support the in-principle view that one is required. Once details of sites are known and it is possible to assess them against heritage (and other) receptors it will also be possible to review this position. We would take this opportunity to highlight the need for an informed assessment of relevant heritage considerations, particularly including an understanding of how the settings of heritage assets contribute to their significance, in order to determine the suitability of sites for development and the manner in which this might take place.
- 2. In addition to identifying designated heritage assets we would encourage reference to the Historic Environment Record and any Local List to identify undesignated assets which should be worthy of consideration in accordance with the NPPF.
- 3. Issues. There is only the one SAM already identified as an entry on the national Heritage At Risk Register. But if the local planning authority has its own At Risk Register there may be other assets to note. Are there any other issues affecting heritage assets or the historic environment which it is useful to highlight here? Identifying specific opportunities for enhancement would be useful given the sustainability objective of seeing whether development could include potential enhancement benefits.
- 4. Is there a conservation area appraisal and management plan? If so, do these identify issues affecting the conservation area and opportunities for enhancement that it is helpful to identify. If not, does the community want to consider carrying out its own appraisal in liaison with the local planning authority to help tease out relevant issues and consider what its response to them might be.
- 5. Guidance on the accommodation of the historic environment in the SEA process can be found on our website at https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/
- 6. Finally, in that the community intends to allocate development sites within its Plan we would encourage early liaison with ourselves and the local planning authority to help ensure that the assessment process can provide sufficient evidence to satisfy the requirements of both the SEA regulations and demonstrate the necessary level of conformity with national and local planning policy.

Kind regards

David

David Stuart | Historic Places Adviser South West

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From: Jo Witherden
Sent: 01 June 2016 15:38
To: Stuart, David; 'John Stobart'; 'Michael Holm'; 'Richard C Dodson'; 'Ed Gerry'
Cc: pimperne@dorset-aptc.gov.uk; 'Peter Slocombe'
Subject: Strategic Environmental Assessment (SEA) scoping consultation: Pimperne

Dear Consultee

Please find attached the Strategic Environmental Assessment (SEA) scoping consultation paper for the Pimperne neighbourhood plan.

At the current time we are progressing on the basis that a full SEA should be prepared, given that the plan is likely to allocate sites for development (albeit these are likely to be modest in scale, and on sites adjoining the existing settlement). However if you consider that a full SEA may not be necessary, we would welcome your comments on this as we would then consider submitting a formal SEA screening request to the District Council.

As you are aware, the first step in preparing an SEA is to collate some basic information on the environment sensitivity of the area, and to consult the three statutory bodies on the possible scope of the assessment. Please therefore accept this email as the scoping consultation under the 2004 EA Regulations. We would also welcome feedback and help from the County Council and District Council.

In particular, the Neighbourhood Plan group would welcome your advice on:

- > Whether the scoping report has identified the main plans and programmes and planning issues and constraints
- > Whether there is any information available on aspects that may be missing
- > Whether the environmental report should focus on certain types of policy or specific topic areas
- > Whether the potential sustainability objectives and assessment methodology are considered sufficiently robust given the likely coverage of the neighbourhood plan and its requirements to be in general conformity with the strategic policies of the adopted Local Plan, and have due regard to national policy.

I look forward to hearing from you within the next 5 weeks.

Warm regards

Jo Witherden (on behalf of Pimperne Neighbourhood Plan Group, acting for Pimperne Parish Council)

DorsetPlanningConsultant Ltd Director: Jo Witherden BSc(Hons) DipTP DipUD MRTPI

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