From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 26 November 2022 16:01
To: clerk@puritonparishcouncil.org
Cc: Andrew Reading <andrew.reading@sedgemoor.gov.uk>; mark.lidster@sedgemoor.gov.uk
Subject: Puriton Neighbourhood Plan (Regulation 14 consultation)

FAO Sally Diaz

Thank you for your Regulation 14 consultation on the Pre-Submission version of the Puriton Neighbourhood Plan. This would seem to be our first involvement with the preparation of your Plan since offering generic advice on its preparation at the time of the area's designation in 2017.

Our focus on receipt of such consultations is where Plans propose policies which are likely to affect our statutory interests. In practice this tends to mean those which aspire to allocate sites for development as these have the greatest potential for generating impact on designated heritage assets.

Our attention is therefore attracted by policy H5 which seeks to allocate a site in Woolavington Road for the development of around 120 dwellings. This would appear to be a safety net provision as at the time of drafting the Plan identifies a live Outline Planning Application for the site. Should that application be approved and the site developed the policy effectively becomes redundant, but in either case a masterplan for the site has been prepared to guide its development.

While the planning application will be required to present an evidence base which covers relevant heritage considerations to ensure an informed decision can be made, this does not obviate the need for the Plan to be underpinned by its own appropriate evidence base to substantiate policies such as H5 and demonstrate conformity with overarching national and local policy for the protection and enhancement of the historic environment.

While the Masterplan does indeed identify the limited number of heritage assets in the settlement there appears to be little assessment of their significance and the extent to which this might have a bearing on the suitability of the site for development in principle, or evidence to show that there are no heritage assets

further afield which might be relevant. There is also no reference to undesignated heritage assets, particularly potential below and above ground archaeological considerations, which examination of the Historic Environment Record may reveal, and which could have a bearing on the layout proposed in the Masterplan.

The documents on the Plan's website do not include any reference to Strategic Environmental Assessment (SEA) and whether a Screening Opinion has been carried out to determine whether the Plan, perhaps primarily on the basis of policy H5, is likely to generate significant environmental effects. Case evidence has demonstrated that impact on the setting of a designated heritage assets can constitute such effects. Our records also appear to indicate that we have not been consulted on an SEA Screening, which would have been necessary had initial findings suggested that a full SEA is not required.

We appreciate that there may be no heritage assets whose settings or fabric need to be considered in the allocation of the site but at present there appears to be no evidence to demonstrate that this is the case. A site options evaluation would normally cover such a consideration but it is not clear how such an exercise may have been undertaken.

We are also conscious that your community is obviously at an advanced stage in the preparation of its Plan, and keen to identify a way in which the statutory requirements of the Plan-making process can be accommodated in the most straightforward and expedient manner. For this reason we would encourage you to liaise with the planning and conservation officers at Sedgemoor District Council.

A simple written testimonial from the conservation officer confirming that the allocation of the site and its development as proposed in the Masterplan would not harm heritage assets could constitute acceptable evidence in support of the Plan and policy H5. Such evidence can also be used to help evidence any view that a full SEA is not required.

At the same time, this may all become academic if, since the drafting of the Plan, the Outline Planning Application has been approved!

In the meantime, we recommend the use of our guidance on SEAs, the Setting of Heritage Assets, Site Allocations, and Neighbourhood Planning respectively. This can all be found on our website via the following links:

https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/

https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/

https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/

https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-historic-environment-advice-note-11/

We would be happy to review our advice on receipt of further information which addresses the points made above We would also be happy to defer to the local planning authority on the basis above and look forward to endorsing satisfactory accommodation on receipt of a subsequent Regulation 16 consultation on the Submitted Plan.

Otherwise, we note and applaud your community in its identification of the locally distinctive historic character of the area, and the accommodation of this in policy BNE3 covering locally valued landscapes and views and the creation of the Puriton Design Guide.

Kind regards

David

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