



Historic England

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Telephone 0117 975 0680

**Via email**

15<sup>th</sup> 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 Dorset District Council's conservation team in an email of



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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).

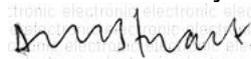
The SEA Report has assessed each site against heritage receptors (Table 5) and produced outcomes of impacts on heritage significance arising from policy MHN in Table 8a. This concludes that impacts will be “uncertain”, although Table 9a when looking at the impacts of the proposed housing sites then concludes 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



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