

St Erme Neighbourhood Development Plan (2018-2030)

Evidence Base



Evidence Base

This Evidence Base Summary provides the background to information to support the St Erme Neighbourhood Development Plan (NDP).

This includes details of consultations held throughout the NDP process; consultees, publicity and documentation which demonstrate the policies in the NDP represent the views of the community and conform to national and local policy.

This evidence base contains the following:

Consultation

- Initial Survey [March 2015](#) and Exhibition Events
- Public Meeting [June 2015](#)
- Consulted 15 local parish organisations
- Consulted 12 known businesses within the parish
- Consulted with the community of St Erme Parish
- All consultations details, publicity and results can be viewed [here](#)

Publicity

- [NP Newsletters](#)
- Leaflets
- Posters
- [Website](#)
- [Facebook Page](#)

Documents referred to during the process

- [National Planning Policy Framework \(NPPF\)](#)
- [Cornwall Local Plan](#)
- [St Erme Local Landscape Character Assessment](#)
- [St Erme Village Design Statement](#)
- [St Erme Parish Plan](#)
- [St Erme Housing Needs Survey](#)
- [Census Data 2011 – St Erme Parish](#)
- [Consultation Statement](#)
- Agricultural Land Classification for St Erme – see Appendix 1

Correspondence referred to during the process

- Nick Cahill (Cornwall Council- Historic Environment Strategy Officer) 3rd August 2018
A copy of Nick Cahill's comments and our response/actions are shown in Appendix 2

Appendices

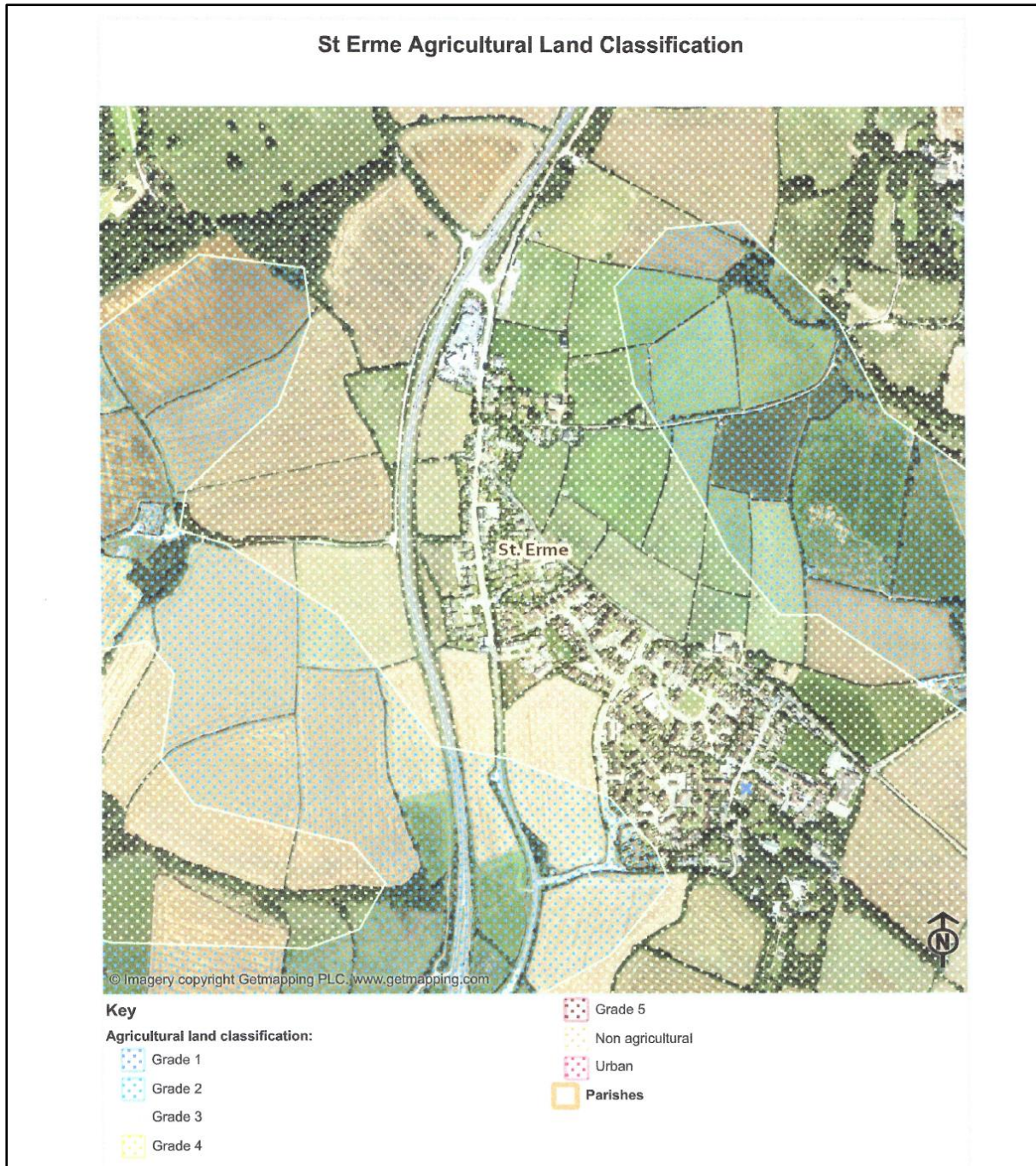
Appendix 1: Agricultural land Classification

Appendix 2: Nick Cahill (Cornwall Council- Historic Environment Strategy Officer)

A copy of Nick Cahill's comments and our response/actions are shown in Appendix 2

Appendix 1

Agricultural Land Classification



Appendix 2

St Erme Neighbourhood Development Plan

Initial thoughts and comments: N. Cahill (Cornwall Council- Historic Environment Strategy Officer)
3rd August 2018

Summary:

I cannot see that the settlement boundary, or the infill areas within it (Policy1), nor any of the other policies, are likely to cause any significant environmental impacts to sensitive (or otherwise) historic environment sites as they stand. I am not sure myself that this NDP therefore requires an SEA.

You will see that I do have some concerns and suggestions for improvements and strengthening the plan, and I am concerned about the potential of policy 2, but since there are no specific proposals for this site at the moment, again, I don't think this policy of itself would trigger SEA (there are no fixed allocations/numbers/proposals here per se – just a potential future direction of growth). Perhaps this is not really a Policy at all, but should be set elsewhere in the document?

Notwithstanding that I don't think SEA is triggered, as it stands, the Policy 2 area should nonetheless have an assessment along the lines of the Housing Allocation DPD, with a traffic light DBA, with suggested further investigations and mitigations, and with site-specific policies to safeguard the area in the case of any further development. I've attached an example of what has been done for the DPD. This process is what has happened (albeit not in a single place within the document) for the village settlement area.

There are other improvements that I suggest could be made to strengthen the policies within the NDP; at the moment the historic environment aims are about *protection* – e.g. at protection of ancient field patterns north of the village, and individual assets throughout the area. It would be desirable to seek for *enhancement and further understanding* of these landscapes and assets, and for future development to have regard to this aim (see the example below from Falmouth of a policy which aims to do this).

Detailed comments:

Policy 1

The village boundary seems to me to have been eminently sensibly drawn –the use of the settlement boundary landscape assessment was clear and good; the settlement edge landscape assessment in particular demonstrates the minimal impact on any historic landscapes of value; the HER was consulted to identify historic sites and assets and no impacts identified (I attach plans).

If I have a criticism, it would be that more could have been extracted from the Village Design Statement into the Plan text to make it clear what the character and sensitives of the built-up area are. I think this would then be very good evidence to show that the settlement area has potential windfall sites and the two larger 'plots' could be developed without any discernible impact on historic fabric, nor historic character of the village –in both cases they are separated from the historic core areas, and would be seen as part of the existing modern development areas of the village, and have no identifiable heritage issues -and the Village Statement helps demonstrate that, better than the rather bald evidence in the Plan itself.

More could also have been made of existing archaeological surveys and investigations on the village edge (shown on the event record in intranet mapping), which found virtually nothing but evidence of

continued use over the centuries of much of the land immediate around the village for agriculture, which strengthens the evidence for limited impact in these parts of the village area.

I do have concerns that the wording of the design guidance within policy 1 is too prescriptive – there are other feasible ways of minimising landscape impact (height, scale, density, orientation, use of material, especially roof) etc. which are not dependent upon bungalow or dormer bungalow design. Adoption of an assessment framework style of policy (see below for example from Falmouth under Policy 3) would actually make this less prescriptive –therefore more compliant with NPPF, and actually a much stronger policy.

Actions Taken

Paragraph's: 5.5, 5.6, 5.7 added

Paragraph: 9.4 added

Policy wording changed: paragraph 2 added

Policy 2

If I have a criticism it is this issue that easily available evidence has not been utilised that would actually have strengthened much of the Plan –but may, it has to be said, question some other aspects. The evidence base is largely the landscape assessments; both stage I and stage II (the settlement edge). These are good as far as they go, but do not sufficiently address the wider historic environment. At the moment there is an emphasis on visible standing and isolated assets, and the HER has been consulted and used appropriately in the assessments in this respect. However, more could be done to give a sense of place both within and around the village.

The use of Historic Landscape Characterisation and the associated descriptive texts would greatly enhance the understanding of the landscape, and place the field patterns, hedges, ornamented landscapes etc. into their historic context. This could be a fairly straightforward exercise -all available through CC intranet and indeed internet mapping in conjunction with our own web pages.

This is particularly important in the south and eastern edges of the village, where the setting and surroundings of the church town and rectory group are very significant; this relates to a sense of place rather than just an agglomeration of specific views.

The practical outcome of this would be, I think, to revise some of the assumptions about the appropriateness of the southern area as an 'exception' site, or direction of growth option (Policy 2); this would not negate policy 2, but could severely constrain the amount, density, type of development here. There is as much sensitivity in historic field patterns, potential known sites, and archaeological potential associated with the anciently enclosed land here as there is in the area to the north of the village which has been assessed as being so much more sensitive.

The issue I think is partly one of the use of landscape assessment; that is largely based on visibility, access and the impact on 'receptors' (i.e. people); historic environment assessment is based much more upon the inherent values, significance and sensitivity of the sites and places themselves, regardless of whether anyone can get into them or see them from public viewpoints –it is a different statutory as well as philosophical approach...

More assessment (see summary above) is I think warranted if this is to be retained as definitive policy proposal.

Actions Taken

This is not a site specific policy proposal – it relates to exceptions sites and the criteria which must be used to judge whether an exceptions site is appropriate. Wording has been added to the policy to ensure that the setting of historic assets is protected.

Policy 3

I have a slight concern that this policy is too minimally worded; being 'in keeping with' is bit vague. I think if there was an assessment policy it would strengthen the process and tie it much better to the village design statement and the character of the different areas – Falmouth have the following:

POLICY DG3: Design and local distinctiveness in the historic core

Development proposals should respond positively to local identity and distinctiveness using the Falmouth Character Areas Assessment in Tables 3.1-3.6 for the historic core to inform the design approach in a planning application. The extent to which this is demonstrated in the development proposals should determine whether the proposal is in keeping with the character of an area.

- 1. Proposals should in general design be in harmony with adjoining buildings and reflect the Locally Distinctive Features identified in the Character Area;*
- 2. Whilst new buildings should reflect the purpose for which they are proposed, their design should be informed by the context of the site and its surrounding in terms of height, scale, massing, orientation and location within the site, avoiding any overwhelming impact on buildings nearby, nor impinge unacceptably onto the streetscape, whilst maintaining a human scale and following established/traditional building line practice;*
- 3. New developments should demonstrate a positive relationship with the public realm, maintaining and improving the permeability of pedestrian routes; 4. Materials where practical should be sourced locally;*
- 5. Design cues should be taken from Locally Distinctive Features and Landmark Buildings noted in the Character Area and there should be sufficient richness of detail in their design and materials;*
- 6. The demolition of buildings which contribute to the character of an area, as part of development schemes, should be avoided.*

Where appropriate and feasible, proposals should help to address any Negative Features and take up Enhancement Opportunities.

I am also quite concerned by the following parts of the policy wording:

- To include garages and/or adequate off road parking within the curtilage of each property for vehicles with a minimum provision of two parking spaces per household
- To include provision for visitor car parking suitable for the size of development in keeping with a rural community.

Those provisions seem to me to be prescriptive, and to potentially conflict with an analysis of the character of the areas; parking may well be an overriding consideration or the local community, so you may have to discuss with them/other in planning/highways how achievable and desirable this really is, because it could challenge their desire for quality, for affordable housing, for limited impact

on landscape and streetscape, for maintaining the character of the historic village (tight up against road, limited front garden, limited parking etc....there is an inbuilt conflict that these policies do not resolve and potentially exacerbate).

The same issue crops up in **Policy 5** – although the wording there is much better and is not prescriptive....a better alternative wording for policy 3?

Actions Taken

Policy wording has been changed.

Policy 7

What is really missing from here is an analysis of the rectory grounds and gardens –it may be argued that it isn't public open space –but the churchyard is included –that's not really public open space, and the policy talks about amenity land regardless of ownership; the issue is that the 'historic' elements of this plan only refer to buildings –not to landscapes or gardens or spaces nor to archaeological potential –the other documents referred to may have more, but....

This gets back to the use of Historic Landscape Characterisation, which would help identify the rectory grounds, and possibly the extended ornamented landscape (the tree-lined lane to east) and give a sense of place, an adequate setting to the whole church town area.

Actions Taken

Rectory grounds and gardens are not suitable for designation as Local Green Space and there is no public access. There is public access to the churchyard.

Policy 8

Not really an historic environment issue, but I found the wording of the policy difficult to get around....

Actions Taken

Noted

Policy 9

Broadly have to say I felt this is more about the natural than the historic/cultural environment – maybe that's because of my own bias! - Para 9.78 for instance seems to stress the natural wildlife, but not recognise the landscape so much as an historic and cultural asset, as an integrated place, not just a collection of individual assets. This came out of the landscape assessments too when I looked into them in detail – good on identifying individual features, not so good on getting a sense of place or of an integrated landscape, and not really hitting the idea of setting being more than just a collection of views.

There is mention of assets with local significance (i.e. non-designated assets/local list) –but these are not necessarily all identified (needs fuller reference to the Village Design statement –but even that can't be definitive). This again points to the need for an assessment policy, as per the Falmouth example (which also has a proposed local list policy quite good –needs a bit of tweaking...).

The main issue with the policy for me is that it doesn't reference historic environment assessment – it falls back on NPPF, therefore, which is fine, but sets up a potential conflict then with the overriding natural environment and landscape assessment of the NDP as against the historic environment requirements of NPPF and statute –what takes precedence? –is there a potential conflict? –because they haven't addressed historic environment requirements as historic environment requirements (as opposed to elements of a landscape assessment), is this compliant?

The policy also only references the landscape assessment –I checked through this and I found it not adequate to identify heritage assets, places, settings, issues. They could usefully reference the Design statement which is better in that regard.

Again –an assessment policy would help –it would also help in the need to demonstrate that proposals don't have adverse impacts –what evidence do they need? What process do they follow? Who decides? Need clarity.

Finally, Archaeological Potential doesn't figure anywhere that I could see – and needs to; it is an NPPF requirement still. HLC would help tackle that, as would a policy requirement of the sort of mitigation and assessment –based design requirements set out below:

Understanding the historic environment – stages:

- 1 Identify the site, the heritage assets and their settings
- 2 Explain the heritage significance, sensitivities and capacity for change (irrespective of any known proposals)
- 3 Understand the potential impact of specific proposals on that significance - summarise any proposals, assess impacts and harm – further detailed assessments may be required, as appropriate
- 4 Show how the understanding gained from the various stages of assessment has informed the design process (and where necessary produce a Mitigation Strategy) to:
 - a. look for opportunities to avoid, minimise or mitigate impact
 - b. better reveal or enhance significance, create a more sustainable and interesting place
 - c. justify harmful impacts (in terms of sustainable development, overriding benefits etc.)
 - d. offset negative impacts (recording, disseminating, archiving archaeological/historical information.

Actions Taken

Noted

Additional wording has been added in para 9.83 and a new paragraph 9.88.

It has already been established through SEA screening, that the settlement boundary will not give rise to significant impacts on the environment, including the historic environment. A strategic framework exists to protect the Historic environment, in Policy 24 of the Cornwall Local plan and in the NPPF.

Policy 11

Renewable Energy and thermal efficiencies features will be supported for existing and new domestic and commercial buildings providing that they do not detract from the historical and landscape setting.

My comments would be - What historical and landscape setting? How assessed? Impact on setting varies depending on the type of development as well the scale and location –a housing scheme may affect setting of an asset differently from a wind turbine –what guidance is to be used?

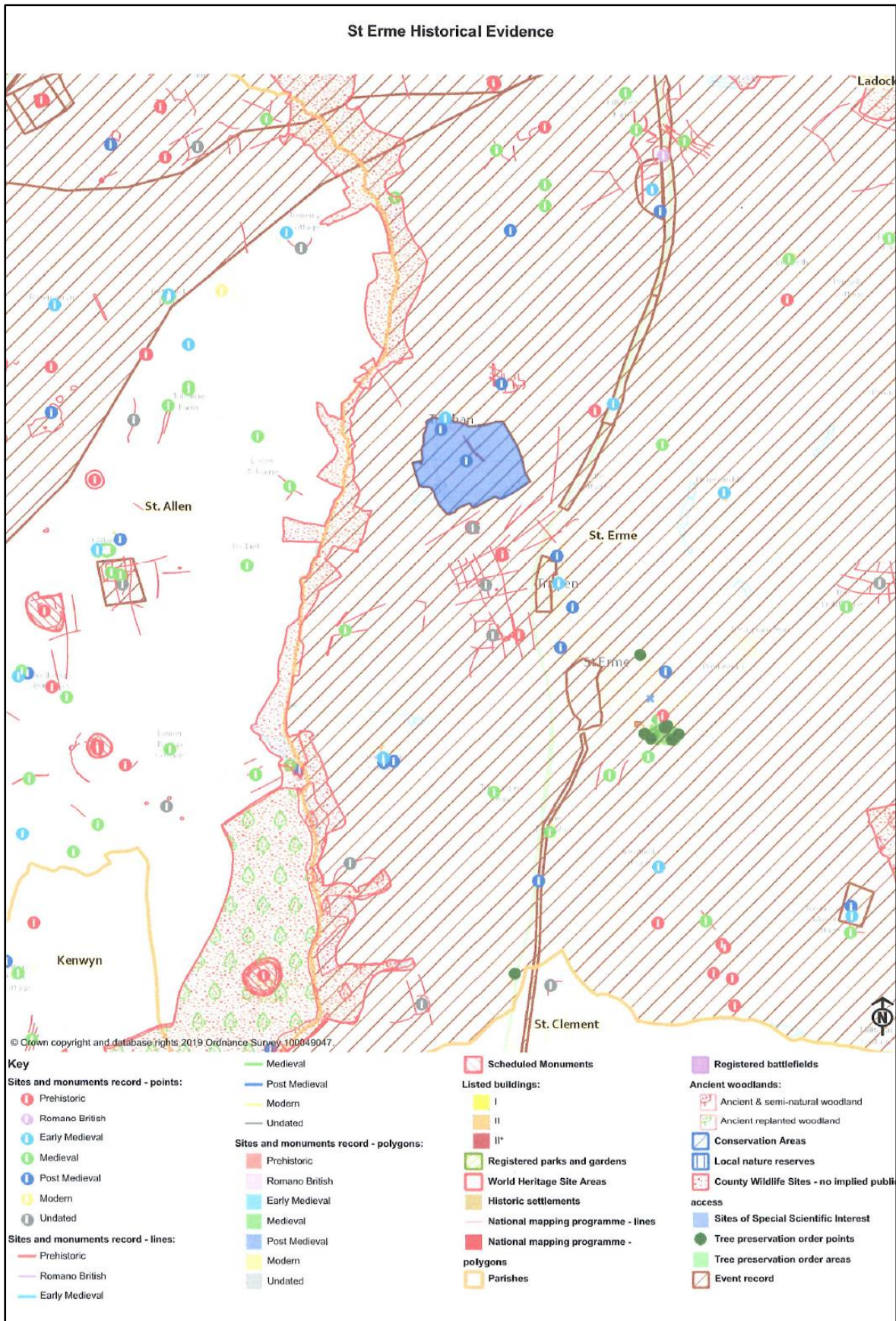
Simple reference to existing guidance produced elsewhere (CC/Historic England/Landscape Institute?) might suffice here.

Actions Taken

Noted

**This will be assessed at application level as per Historic England's guidance as follows;
<https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/microgeneration/>**

Appendix 3 Historical Map



Historical Map - St Erme

