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Ack.

From: Stuart, David
Sent: 01 October 2015 15:23
To: DPD
Subject: NORTH WEST CULLOMPTON URBAN EXTENSION MASTERPLAN
Attachments: Cullompton NW Urban Extension Masterplan, 1.10.15.doc

Dear Sir / Madam

Thank you for your consultation on the North West Cullompton Urban Extension Masterplan.

Please find attached our letter of response.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND



From: Poie-Yee Li
Sent: 09 September 2015 12:33
To: Stuart, David
Cc: Susan Warren; Catherine Marlow; Thea Billeter
Subject: RE: CULLOMPTON

Dear David Stuart,

We sent a postcard at the beginning of the consultation to the following:

Mr		Ross	Simmonds	
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29 Queens Square			Bristol	Avon	BS1 4ND
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Please accept our apologies if this is no longer the correct contact for Historic England. This was our previous contact for 'English Heritage' before it was changed to 'English Heritage' and 'Historic England' as part of the NW part 1 consultation. Did you want me to update the database with your contact details for Historic England for future consultations?

Please find attached the postcard sent to Mr Ross Simmonds.

If you have any further questions, please do not hesitate to be in contact.

Kind Regards

Poie Li BSc (Hons) MA MRTPI

Forward Planning Officer
Mid Devon District Council
Tel: 01884 234 922

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Historic England



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Phoenix House
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EX16 6PP

Our ref: 2274
Your ref:

Telephone
Email

1st October 2015

Dear Sir / Madam

NORTH WEST CULLOMPTON URBAN EXTENSION MASTERPLAN

Thank you for your consultation on the latest version of the masterplan for the Cullompton north west extension.

Our response can be summarised as follows:

1. Our letter to your authority dated 10th October 2014 responded to your authority's previous consultation on this document and identified issues relating to the area's historic environment which we advised should be addressed. These focussed on the need to determine the significance of relevant heritage assets for the masterplan area as a whole. This would ensure that they could be preserved and enhanced in accordance with the statutory provisions of the National Planning Policy Framework (NPPF) and the Core Strategy and Allocations and Infrastructure DPD but also inform the character of new development from a placemaking point of view. We were also keen to highlight the potential benefits which such development might have for the regeneration of the existing town and exploring the mechanisms for ensuring this outcome.
2. While it is not clear whether and how our previous advice has been reflected in subsequent activity we note that, coincident with its issue, an holistic report on the historic environment interests of the masterplan area has been prepared (AC Archaeology October 2014). We have looked at this in conjunction with the latest version of the masterplan to see how it has informed that document.
3. There remains a concern over the absence of a narrative trail demonstrating how an understanding of the area's historic environment has informed the masterplan. We appreciate that the document must inevitably be a distillation of all the



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considerations which have informed its content but there could be greater reference to heritage assets to demonstrate via evidence rather than just assertion that they have in fact formed the masterplan as necessary. While section 4.1 (p45) states that the masterplan has sought to work with, inter alia, the settings of specified listed buildings and local archaeology it is not clear how.

4. Section 2.3 - Site Constraints and Opportunities (p26) only refers to the need for the settings of heritage interests to be taken into consideration. Section 6.10 – Cultural Heritage (p102) elaborates on the need for proposals to preserve relevant settings and that the masterplan has sought to achieve this. It also states that archaeological investigations will be required but again it is not clear how the findings of the AC Archaeology report have informed the spatial parameters - particularly land use allocations - of the masterplan or the specific manner in which development should accommodate them.

It cannot be assumed, for example, that because the Grade I Listed Moorstone Barton is a farmhouse which may not have designed views or landscapes as part of its setting that its landscape setting is not in any way part of its significance. This understanding, together with such previously referred to matters as the definition of a buffer zone to the St Andrews Hill Scheduled Ancient Monument (SAM), may have implications for the extent and nature of the development areas proposed in terms of footprint, scale, layout, density, materials and boundary treatment. Leaving more detailed consideration of fundamental aspects of heritage significance to the post-masterplan pre-application stage could make it difficult to not only ensure the preservation and enhancement of relevant assets but avoid causing harm to them.

5. In that much inference on heritage assets and their significance will have been drawn from the AC Archaeology report it is important to give it thorough consideration. We are pleased that it has identified the importance of the historic environment section of the NPPF and our own Conservation Principles. Our comments on this report can be summarised as follows:

- a) We would advise though that it is the NPPF's own principle – not our own view – that the NPPF must be satisfied in full in order for development to be deemed Sustainable (2.7, p3).
- b) The basis for determining the appropriateness of a 1km study area relative to the historic environment considerations of the plan area is not clear.
- c) Site visits investigated the settings of those designated heritage assets which it was felt had the most potential to be impacted upon by proposed development (8.1, p22). Full settings assessments were not carried out. The report also states that there are known non-designated heritage assets which are likely to be impacted upon by development but that the level of assessment undertaken meant that nothing had been identified which might act as a constraint to developing the land.
- d) Section 8 lists those assets where impact is likely and identifies that further investigation to better understand the susceptibility of their settings to change may be necessary. Section 9 highlights the extensive below ground archaeological potential but does not advise on what further work may be desirable to better inform the masterplan on what exists or how it and any



- development should accommodate it. Agricultural practices will have caused damage to some assets but extensive potential exists where deep ploughing has not taken place.
 - e) Overall, it is not clear how the AC Archaeology report has provided sufficient information for the masterplan to demonstrate that it will preserve and enhance heritage assets.
6. In conclusion, and based on the information available to us, we are concerned that insufficient evidence may be available to demonstrate that the masterplan has understood and sufficiently understood the significance of relevant heritage assets to ensure their preservation and enhancement in compliance with the statutory provisions of the NPPF. This is disappointing given our stated interest in this document, our wider active interest in Cullompton, and the opportunity which has existed over the past year to involve us more fully in proceedings which would have facilitated addressing relevant issues collectively at earlier, more helpful stages.

I should add that this position does not automatically equate to an objection to the masterplan and if we can be satisfied on the matter of its evidence we would wish to offer the document our full support.

Yours faithfully

David Stuart
Historic Places Adviser



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