



ENGLISH HERITAGE

SOUTH WEST

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Date 10 August 2012

Dear Sirs,
South Somerset Local Plan 2006-2028- Proposed submission Consultation- June 2012

Thank you for providing English Heritage the further opportunity to comment on the emerging Local Plan for South Somerset.

Whilst significant progress has clearly been made since our previous letter of the December 2010, certain important issues remain to be satisfactorily addressed to ensure the document is in accordance with the National Planning Policy Framework and therefore considered to be Sound. We hope the following advice and further constructive involvement can help ensure the support of English Heritage for the effective conservation of your heritage assets and the delivery of sustainable development.

As the Government's adviser on the historic environment, English Heritage will seek to ensure that South Somerset's heritage is fully taken into account in accordance with national planning policy.

A clear recognition of the importance of the historic environment to S Somerset's economic, social and environmental well-being is noted (Policy SD1). The Plan highlights S Somerset's broad historic character, the variety and significance of its heritage assets and tourism attractions that provide a positive and fertile environment for economic investment, and the basis for achieving sustainable development.

Whilst there is much to admire in the Plan, there continues to be a number of significant concerns to be resolved before it can be fully endorsed. As the Plan will have a profound affect on South Somerset's historic environment it is vital to ensure it plays a positive role in its conservation. There are extensive proposals affecting the significance of a number of important heritage assets.

Unfortunately, we would conclude that at present and for the following reasons the Plan provides insufficient consideration and protection of the historic environment,

and is therefore unsound. However, these significant matters may be resolved without a substantial departure from the thrust of the Plans approach. I hope the suggestions to do so can be accommodated.

To assist, a structured table of comments is provided with this covering letter. Whilst it relates to the main document many of the issues are in turn relevant to the SEA/SA process.

Summary of main issues;

- We refer you to our separate letter (10/8/2012) relating specifically to the proposed Urban extension for Yeovil. We believe that this is such an important issue for us that it is necessary to write separately to highlight the matters that we consider still need to be undertaken before the justification can be made to locate this urban growth in the location indicated on Inset Map 15.
- **Proposed Yeovil urban extension- Policy YV2.** We question how sustainable this policy proposal will be and whether it truly reflects the requirements of the NPPF and the criteria embodied in **Policy SD1** for sustainable development.
- **Proposed Yeovil urban extension- Policy YV2-** Subject to the principle of development being justified in this area, an historic landscape character assessment and sensitivity analysis¹ should inform any future masterplan. Any harm to the significance of the heritage assets and their settings affected by development should be minimised. Further investigation and mitigation should inform a high quality design response to this context that, for example, integrates features of archaeological importance. The above should complement, where appropriate, the specific recommendations highlighted in the Historic Landscape Assessment and the Historic Environment Assessment for Yeovil Periphery. However, we have not seen any evidence to indicate that these assessments have been made for this specific site or any other settlements within South Somerset.
- At present the Plan fails to positively address South Somerset's heritage assets at risk. There are 8 schedule monuments; 10 grade I and II* buildings; 3 historic parks and gardens, 1 battlefield and 4 conservation areas (this data may not be up to date) on the national heritage at risk register². There is no indication of an intention to continue to carry out *at risk surveys* in future to ensure there is an understanding of what is "at risk" nor a clear strategy in response to those assets at risk. Perhaps a role for the additional heritage SPD referred to at 12.40.
- Reference to registered battlefields is not included.

¹ Paragraph 169, 170 National Planning Policy Framework, March 2012.

² For a site to be eligible for inclusion on the Register, it must be a nationally designated site. The Register includes grade I and II* listed buildings and all listed places of worship, scheduled monuments, registered parks and gardens, and conservation areas and registered battlefields.

- **Indicators;** To ensure a clear and effective strategy, additional policy targets are recommended and might include:
 - The completion of historic environment guidance (Heritage SPD).
 - Up to date heritage at risk surveys and conservation area appraisals/ management plans.
 - Contributions secured to maintain and improve heritage assets (Policy EQ3- See Table for suggested amendments).
 - The reduction in the number of heritage assets on the national at risk register.

Additional historic environment guidance

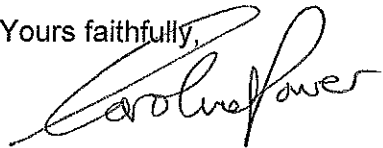
English Heritage welcome the commitment to prepare additional guidance (heritage SPD) to aid the application of Policy EQ3 but it is important to indicate more clearly its scope, purpose and when it might be prepared. Otherwise this potentially important component of a positive and proactive strategy for the conservation of the historic environment is merely aspirational and may not actually come to fruition therefore affecting the effectiveness of the Plan, and as a consequence its soundness.

To be Sound the Core Strategy and SA will need to state very clearly the evidence that has gathered and applied; demonstrating the particular significance, condition and sensitivity of South Somerset's heritage assets and their setting has been understood and addressed. There will need to be a specific and comprehensive heritage policy and strategy for its conservation and enjoyment.

The individual issues raised in this correspondence, especially when considered together, amount to a concern of substance affecting the soundness of the document. Nevertheless I trust the suggestions made in this letter may affect a positive outcome.

I look forward to hearing from you in due course.

Yours faithfully,



Caroline Power

Historic Environment Adviser- Bristol, Gloucestershire and Somerset.

Cc Adron Duckworth- Conservation Officer.