

Our reference: PL00065212

Dear Kathryn,

Many thanks for your email of 1st February 2023, inviting us to comment on the Regulation 14 draft of the St Newlyn East and Mitchell Neighbourhood Plan.

Our role as a national statutory consultee for Neighbourhood Planning focuses mainly on ensuring there is no risk of undue harm to heritage assets. The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made.

Where a neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. Therefore, when such allocations are proposed, we look to see that they are supported by appropriate evidence to demonstrate conformity with national policy for the protection and enhancement of the historic environment, as set out in the National Planning Policy Framework (NPPF). Such evidence ought to demonstrate that there is not the potential for significant environmental effects, in terms of harmful impact to heritage assets.

We note that the draft Neighbourhood Plan itself does make a number of specific site allocations for housing and employment above and beyond those inherited from the Local Plan, or the Cornwall Site Allocations Development Plan Document (DPD).

Given this, we would usually expect to see a heritage-based justification that explored the potential risk of harm to heritage assets at each named site. It would be normal to have a brief assessment, at each named site: a narrative and recommendations as to how any proposed development might avoid, or mitigate potential harm. Currently, such justifications for development do not seem to be adequately explored in either the Neighbourhood Plan or the Strategic Environmental Assessment (SEA).

Therefore it is essential to review all policies for named sites where development is being supported. The examples of where harm to heritage assets may be a concern and an assessment / justification will be required :

- Land off Halt Road, St Newlyn East
- Land at Chapel Terrace, Mitchell
- Land rear of Metha Row, St Newlyn East
- Land at Four Winds, Mitchell

This exercise may reveal that there is little, or no risk of harming heritage assets. However, it may also reveal that heritage assets could be at risk from these policies, in which case a justification should be provided.

In our response to the Strategic Environmental Assessment (SEA) scoping report, we previously suggested that the following work be carried out:

*"The draft heritage asset map isn't particularly legible. It is difficult for us to make any further comments until we are able to see the relationship between the identified heritage assets and the allocated sites more clearly illustrated. Therefore, we recommend mapping the assets on a series of zoomed-in maps for each allocated site."*

This exercise still hasn't been carried out and it is no easier for us to make sense of the potential risk to heritage assets.

We recommend that the Planning Group seek the advice of their Local Authority Conservation Officer, who is best placed to suggest suitable ways forward. It is possible that revisiting the SEA to include a narrative on the potential areas at risk of harm may suffice.

We welcome Policy NEM7 Heritage Assets. However, we feel that policy itself could be more fulsome. Moving forward, it may be helpful for the Neighbourhood Plan Steering Group to consult our standard advice, on the preparation of neighbourhood plans, if they haven't already done so. Here is a link to our recently updated guidance:

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

Further to this, I would like to suggest some general guidance that is likely to be helpful to the steering group in finessing the Neighbourhood Plan. I have attached a list of sources of information. I have also attached our generic guidance on plan preparation and a live list we have compiled of those plans in the Southwest that we have come across which are notable from a heritage perspective. You will see that this covers a wide range of themes to draw upon.

I hope that our response has been helpful. We wish you well with your on-going work and look forward to having an opportunity to make further comments at the regulation 16 stage.

Kind Regards,

Alan

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