



Historic England

Response provided by email  
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22 January 2018

Dear Sirs,

## North Dorset Local Plan Review - Issues and Options Consultation

Thank you for providing Historic England with an opportunity to consider the Issues and Options report. As the Government's adviser for the historic environment Historic England will seek to ensure the significance of North Dorset's cultural heritage is sustained and opportunities for its enhancement are fully considered as part of a clear and positive strategy.

*Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. NPPF paragraph 126*

### The scope of the Local Plan Review and an appropriate response to North Dorset's heritage assets

As the scope of the Local Plan review is "*all encompassing*" (NDLP I&O paragraph 1.4) one would anticipate that the current approach to heritage management within the Local Plan should be reviewed to ensure any future expression of heritage management in the document is up to date, relevant and effective.

At this early stage it may be opportune to emphasise that a positive strategy in the terms of NPPF paragraphs 9 and 126 is not deemed a passive exercise. It appears clear that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment. The Government's reference to "seeking positive improvements", "positive strategy", "deliver the conservation and enhancement" and "a clear strategy for enhancing" all demonstrate that it is not sufficient for local planning authorities to be merely reactive in the conservation and enhancement of their historic environment.

In response to this it may be helpful if you were to prepare a Heritage Topic Paper setting out the issues, opportunities, current and likely future risks and challenges facing North Dorset's historic environment and how the Local Plan, associated guidance, management plans, initiatives etc. might address these matters and fulfil the above national policy expectation. We note the I&O report makes limited reference to the historic environment in the Social, Economic and Environmental sections of chapter 2 (context) or in the Opportunities section relating to each of the main settlements.



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The issues facing the District's historic environment, and a coherent positive response, could be informed by engaging the enthusiasm and expertise within and beyond the Council including heritage groups and neighbourhood associations.

A positive strategy for the conservation of the historic environment might include how the local authority intends to maintain an up-to-date series of conservation area appraisals and delivery of management plans; an up to date Local List of non-designated heritage assets; up-to-date heritage (at risk) surveys etc. Historic England is currently preparing guidance on Local Plan heritage strategies; in the meantime GPA<sup>1</sup> *Local Plans and the Historic Environment* may be useful. <https://historicengland.org.uk/advice/planning/plan-making/>

The Local Plan might highlight in its positive strategy, the role of North Dorset's Neighbourhood Plans in the delivery of improvements to the historic environment, its future conservation and enjoyment.

The Local Plan will need to acknowledge and respond to the growth potential of the tourist visitor economy, currently 9% of GDP, an 8.1% increase since 2010, and by 2025, the total contribution of tourism to the UK is forecast at £324 billion and 4.6 million jobs (Deloitte/Oxford Economics). What are the implications for North Dorset, how can future growth potential be planned for and how can the related opportunities for improvements to sustain North Dorset's heritage be realised?

We hope a Heritage Topic Paper will enable you to cover the above, setting out the (clear and up-to-date) evidence, initiatives and commitments in place (or to be initiated) to inform a clear and positive heritage strategy within the Local Plan.

### **Spatial Strategy – *Where should future development be located within the District?* Identifying suitable locations for the delivery of sustainable development.**

The planning system in England is based on the principle of sustainable development and heritage plays an increasingly important role in stimulating regeneration and informing sustainable growth, securing positive change that helps safeguard our historic places and heritage assets.

We note the suggested spatial strategy, emerging potential allocations and infrastructure and appreciate that a consideration of the significance of the District's historic environment is, and will continue to be an important factor, within the relevant legislative and national policy context<sup>1</sup>.

In this respect it is vital that the importance of the history of North Dorset as reflected in the rich built and natural environment shapes the future direction and form of growth to ensure its identity and cultural heritage is safeguarded and the positive opportunities are recognised.

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1. Great weight should be given to the conservation of heritage assets (NPPF Paragraph 132);
  2. Special regard must be given to desirability of preserving the setting of a listed building and special attention must be given to desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of planning functions (S66 & S72, Planning (Listed Buildings and Conservation Areas) Act 1990);
  3. Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Paragraph 129);
  4. Harm should always be avoided in the first instance. Only where this is not possible should mitigation be considered (NPPF Paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.



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We note that an assessment - of some kind - of the implications for the historic environment has been undertaken to inform the spatial strategy. It will be very helpful to establish the form of this assessment, what information has been gathered and how it has been applied.

It may also be helpful to confirm whether the advice has been useful in *The Historic Environment and Site Allocations in Local Plans (Historic England Advice Note 3, 2015)*  
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

In addition we would emphasise the relevance of NPPF paragraph 170 and the need to apply landscape sensitivity assessments to inform major expansion options?

Historic England note the case presented for identifying and safeguarding a route for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass. It would be helpful if the local authority could share the evidence gathered and highlight the implications for the historic environment and the scope for mitigating potential harm. We would welcome the opportunity to discuss this matter further with you.

Planning Policy Guidance (PPG) is clear that evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. The implications of any allocation for the setting of heritage assets should not be overlooked or 'parked' to a later application stage. PPG is clear that where sites are proposed to be allocated in a development plan, sufficient detail should be given to provide clarity about the nature and scale of development (addressing the 'what, where, when and how' questions). We would also refer to the above statutory and policy tests that need to be addressed to ensure the Plan is Sound.

We note that further work will be undertaken to refine the Plan, its proposals and allocations. We hope the above advice will help you to demonstrate that an appropriate response to the historic environment has been provided in accordance with the statutory and national policy tests such as regarding the gathering and application of heritage evidence in accordance with NPPF paragraph 169.

In relation to the Plan as a whole, it will be important to clearly show how a positive strategy for the conservation and enjoyment of the historic environment is to be achieved and delivered, including those heritage assets most at risk through neglect, decay or other threats; in doing so recognising that heritage assets are an irreplaceable resource and need to be conserved in a manner appropriate to their significance.

I hope that our suggestions can help ensure that growth safeguards and complements North Dorset's special historic character and renowned heritage assets. We look forward to working constructively with you on this important planning document.

Yours sincerely

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