



Mr Clive Fletcher
Historic England

Harborough District Council

The Symington Building, Adam and Eve Street,
Market Harborough, Leicestershire LE16 7AG

Tel 01858 82 82 82

www.harborough.gov.uk

DX 27317 Market Harborough

In reply quote: Dunton Bassett NP

Please ask for: Matthew Bills

Telephone: 07703211863

Email: m.bills@harborough.gov.uk

Your ref:

Date 18/10/2022

By email only.

Dear Mr Fletcher

Re: Dunton Bassett Neighbourhood Plan Hearing

The hearing for the Dunton Bassett Neighbourhood Plan has now taken place and I have been asked by the Examiner to write to Historic England to clarify comments made on behalf of Historic England prior to the hearing.

In March 2020 Historic England made the following comments in response to the proposed screening determination of the Plan by Harborough District Council (HDC):

Thank you for consulting us on the Dunton Bassett Neighbourhood Plan and SEA Screening Report. We have looked at the documents, and note the presence of a housing allocation (Policy H1), which is adjacent to the "Dunton Bassett Moated Site with Fish Pond" Scheduled Monument. Development here will inevitably affect the setting of the monument, and may harm its significance, so we disagree with the conclusions of the Screening Report which advises that SEA will not be necessary – in our view the allocation would have significant environmental effects. We further advise that the presence of the allocation may present a risk to the plan, as harm to the significance of a designated heritage asset runs contrary to the NPPF's requirement for sustainable development. SEA would establish what effects the allocation would have and inform the neighbourhood group's decision on whether to retain it.

On the basis of the comments from Historic England (HE) in March 2020, HDC advised the Qualifying Body (QB) in March 2021, as part of its initial determination, that further work was required to consider the effects of the Plan on the historic environment. It was not specific that an SEA was or was not required. The landowner of the proposed allocation site commissioned a Strategic Heritage Assessment which was to consider the effects of development on the historic environment and this was forwarded to and was submitted by the Parish Council.

When consulted on the adequacy of that document in August 2022 in response to the examiners question as to the SEA screening, HE reiterated its previous comments that an SEA was required.

Tess Nelson
Service Manager

Strategic Planning

These comments informed the formal screening determination, issued by the District Council which stated

*It is the determination of the Council in these circumstances, and without evidence to the contrary, that a **full Strategic Environmental Assessment is required for the Dunton Bassett NDP to assess the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental objectives.***

Prior to the hearing of 11 October 2022, Historic England communicated with the Council (email of 6 Sept 2022) with the following comments:

Thank you for your message. Historic England will not be fielding a representative, but our position is straightforward, so we hope that further explanation will be unnecessary.

We are aware of the heritage assessment work that has been prepared as part of the NP. We do not disagree with the conclusion that the proposed site allocation would result in less than substantial harm to the significance of the scheduled monument and have not objected to the proposed allocation. We also note that Policy H1 for the site includes a criteria requiring a landscaping buffer zone in relation to the heritage asset and its setting.

Our concerns relate to the absence of evidence on the proposed measures the Plan might need to put in place in order to ensure that any harm is minimised. At present, the Parish cannot demonstrate that the site it is putting forward for possible development is compatible with the draft policies for the protection of the historic environment and housing quality set out in the draft NP or the requirements set out in the NPPF. The absence of any such evaluation of potential mitigation must bring into question the deliverability of the site and the amount of development it could accommodate.

We refer the Parish back to the Local Authority's own heritage advisers in respect of our concerns. It is a matter that could potentially be addressed through an SEA.

I hope this clarifies our position on the matter sufficient for the purposes of the hearing.

At the hearing on 11 October 2022, it was suggested by representatives of the landowner that the 6th Sept 2022 comments from Historic England appear to dilute their earlier view that a Strategic Environmental Assessment was required and that the Parish 'should refer back to the Local Authority's own heritage advisers' in respect of this matter.

For your information, the initial SEA Screening opinions of January 2021 and March 2021 which had been issued by HDC were informed by the views of the Council's own

heritage advisers, who considered that the scale of harm to the scheduled ancient monument would not be significant and agreed with the Strategic Heritage Report that the harm would be less than substantial, but at a modest level within that category . The views of the Councils heritage advisor had not changed.

As you will be aware a Strategic Environmental Assessment is not required for every Neighbourhood Plan. The Planning Practice Guidance advice is that the question of whether a neighbourhood plan proposal requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed. A strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the local plan or other strategic policies for the area.”

In the light of the most recent statement from HE dated 6th September, the Examiner has requested that I seek a specific statement from HE as to whether it maintains its view that the Dunton Bassett Neighbourhood Plan should be subject to a Strategic Environmental Assessment.

Yours sincerely

Matthew Bills

Neighbourhood and Green Spaces Officer