

## **Historic England**

**Comment Date: Tue 28 Nov 2017**

Dear Ms Day

### NEIGHBOURHOOD PLAN CONSULTATION - ST ERTH

Thank you for your Regulation 16 consultation on the submitted St Erth Neighbourhood Plan. Our apologies for not responding before now

In our previous advice on the formulation of this Plan we have concentrated on Policy HI 1 which promotes the allocation of sites for development. We have repeatedly highlighted the need for evidence to demonstrate that the sites can be allocated without causing harm to designated heritage assets, a point also made in our advice on the associated SEA Screening exercise. Our last involvement in the Plan was the Pre-submission consultation in September last year since when there has been no further contact until the current consultation. Previous advice is enclosed for information.

We note from the Consultation Statement dated July 2017 that our previous advice was acknowledged and that the introduction to the policy was to be amended to give more background on the process of site selection. However, having looked at the current version of the Plan we can still not find any reference to the historic environment. Further, having separately advised that for the same reason we could not agree with the Opinion that an SEA was not required we note too from the Consultation Statement that this absence of need has been stated as confirmed to the community.

The Neighbourhood Plan area contains a significant number of designated heritage assets, mostly Listed Buildings, many of which are clustered in and around St Erth itself. The village also contains a Conservation Area, which one of the proposed sites (Boscarnek) adjoins. While Little Mill and the other sites at Treloweth and Chenchalls Road are physically removed from the Conservation Area, collectively they represent a substantial development footprint which has the potential to impact on its setting as well those of other relevant designated heritage assets.

In the circumstances, and with regret, we therefore feel obliged to formally identify with concern the absence of evidence to demonstrate that the sites in question can be allocated/developed without causing harm to the historic environment, in conformity with planning policy contained in the National Planning Policy Framework and Local Plan.

The absence of apparent consideration of this statutory requirement also means that insufficient evidence exists for us to be able to confirm that harm would in fact be caused. However, it is for your authority, and the Examiner, to determine whether the Plan, and attendant SEA Screening process, is underpinned by adequate evidence for the appropriate level of conformity to be displayed.

We would be happy even at this advanced stage to receive further information which hopefully would allow us to positively revise our advice. Such an exercise would also assist us in determining whether to attend the Examination and give evidence.

Yours sincerely  
David Stuart  
Historic Places Adviser