

Thank you for your consultation on the SEA Screening for the Motcombe Neighbourhood Plan. Our apologies for not responding by yesterday's deadline.

To confirm that this is our first involvement with this Plan since offering generic advice on its designation at the beginning of 2016. Our comments are based on the documents you have provided only. Having looked at the Plan's website there appear to be no other forms of supporting evidence yet available. We also could not find a Conservation Area Appraisal on your authority's website so assume one doesn't exist.

But what has been provided is most helpful. The SEA Screening Report goes into useful detail about the Plan area and its issues, with particular emphasis on the process of assessing the possible site options for allocation. This is complemented by the Heritage Assessment which looks at each of the tentative development sites from the perspective of their potential to generate impacts on heritage assets.

From these reports we can confirm that the focus of our attention is site 1. The Heritage Assessment concludes that there will be a less than substantial level of harmful impact on the setting of the Grade II\* Listed St Mary's Church and that of the Conservation Area and that this can be mitigated through the location and sensitive design of new buildings.

While the report identifies the role of the church tower in defining views it doesn't elaborate on the extent to which a sense of connectivity with its undeveloped rural hinterland plays a part in defining its heritage significance. Similarly, although the report refers to the conservation area backing on to open fields it doesn't define the importance of that part of the area's setting to its heritage significance, merely stating that development could cause a degree of harm. The absence of a Conservation Area Appraisal limits the ability to consider the contribution made by this part of its setting within a more comprehensive strategic understanding or context.

The issue therefore remains the principle of allocation and the fundamental change in character of the site which would inevitably ensue if allocated for development. We must assume that site 1 is part of a wider rural context which plays a significant part in defining the setting of the conservation area and that its allocation in principle will therefore cause harm, even if less than substantial in nature. On that basis it is difficult to see how location and design of development can achieve much in the way of mitigation; it is a question of determining how much development and where the site can accommodate to minimise that harm, not mitigate it. And while mitigation may play a complementary role at this time we do not know what it needs to be or its effectiveness.

At present there appears to be no detailed assessment of the site to be able to determine the answer to those issues. Too much development in the wrong locations and of the wrong design could therefore be quite capable of

generating significant environmental effects. As the Plan at this stage has not yet formulated a policy for the site it is impossible to know whether it will ultimately cause such effects or not. But further site assessment could identify how harm could be minimised, what mitigation should be, and how therefore a policy/brief for the site should be articulated.

As a consequence we are not sure there is enough information to be able to conclude that an SEA is not required. We recognise that the community would wish to avoid carrying out an SEA if at all possible and further research into the site would help demonstrate more precisely exactly what its potential for development would be. If the community wishes to specify a quantum of development for the site then we would certainly encourage an SEA to determine this and associated harm minimisation/mitigation measures. If it wishes only to allocate the site for development with the requirement that further assessment will be necessary to determine its specific potential for development it is not clear at present that this can be achieved without still generating significant environmental effects.

Either way, it seems difficult to arrive at an acceptable scenario capable of avoiding the need for SEA if only on a default basis. Perhaps for now the answer is to defer the matter and repeat the exercise when more information of the kind described above is known.

19 January 2018  
David Stuart, Historic England,