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**From:** Thompson, Alan <Alan.Thompson@HistoricEngland.org.uk>  
**Sent:** 13 July 2023 19:06  
**To:** SW-Neighbourhood Planning  
**Subject:** Staverton Neighbourhood Plan - Regulation 16 Consultation - formal response

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Dear Cameron Whymer,

Many thanks for your email of 16th June 2023, inviting us to comment on the Regulation 16 draft of the Staverton 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 two specific site allocations for new housing. The Strategic Environmental Assessment (SEA) recognises that the allocated Site 1 (illustrated on page 18 of the Regulation 16 Neighbourhood Plan) has the potential to negatively impact four designated heritage assets. The following advice is given:

*“... the SEA recommends that the wording of the site-specific policy (Policy SNP4) or Policy SNP10: Heritage and Conservation is enhanced to encourage development proposals to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas.”* Page 44 of the SEA

Therefore, we welcome the inclusion of section 8 of Policy SNP4 that takes on this advice. We also welcome the protection offered to non-designated heritage assets by Policy SNP10; however, we recommend that this policy also extends to designated assets. We have no further comments to make.

I hope that our response has been helpful. We wish the Neighbourhood Plan steering group well with their on-going work towards a made plan.

Kind Regards,

Alan

Alan Thompson | Historic Places Adviser

Historic England | South West  
1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ

Direct Line: 0117 975 0715 | Mobile: 07548 642067

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