

From: Thompson, Alan <>
Sent: 25 October 2023
To: SW-Neighbourhood Planning
Subject: Okehampton Town and Hamlets Neighbourhood Plan - Regulation 16 Consultation
- Formal Response

Dear Sir / Madame,

Thank you for inviting us to comment on the Regulation 16 Consultation for the Okehampton Town and Hamlets Neighbourhood Plan (15 September 2023).

I am unable to find a record of Historic England being consulted at the Regulation 14 stage, although we did respond to a consultation to the Strategic Environmental Assessment (SEA) screening at the draft stage (2 August 2023). The proposed plan has changed significantly since August. We have particular concern over the inclusion of a new policy on the use of Brown Field Sites (PP2), which effectively allocates eight new named sites for development.

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.

In our previous response to the SEA screening, we concurred with the opinion that a full SEA would not be required, as the draft Neighbourhood Plan did not intend to allocate specific sites for development. Clearly the situation has now changed.

An SEA traditionally provides both an evidence base and a justification for NP policies that seek to allocate sites for development. Such an evidence-base and justification can be provided through other means, e.g. a localised study around all heritage assets that are likely to be impacted by any proposed development on the named allocation sites. This work would include an audit of the heritage assets and an assessment of any potential harm to them by allocating the new development sites. Such a study should be carried out by a specialist with Heritage bona-fides.

In the absence of an evidence-base and justification for the new site allocation policy (PP2), we are not convinced that the Plan meets its obligations under chapter 16 of the National Planning Policy Framework.

Moving forward, it would seem that the Neighbourhood Plan steering group have at least three options to address the inclusion of Policy PP2:

- A) Carry out a full SEA, concentrating on the newly allocated development sites.
- B) Commission a more focused study, considering the impact on heritage assets likely to be affected by the new allocations.
- C) Remove the named allocations from Policy PP2 and only speak more generally about the community's aspiration for development on brown-field sites within that policy.

We encourage the Neighbourhood Plan steering group to consult with the local authority conservation officer to find the best solution.

We hope that this helps. We have no other comments to make at this time and wish the Neighbourhood Plan steering group well with their progress 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](tel:01179750715) | Mobile: [07548 642067](tel:07548642067)

<https://historicengland.org.uk/southwest>



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.