

<u>Name</u>	<u>Date</u>	<u>Comment</u>	<u>Response</u>
Natural England	Letter dated 26.10.21	<p>Thank you for your consultation on the above dated 24 September 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>For any further consultations on your plan, please contact: consultations@naturalengland.org.uk</p>	Acknowledged
Historic England	Email 29.11.21 + attachments	Thank you for the additional information sent in response to our outstanding concerns regarding the potential for impact on heritage assets arising from proposals for development in policies HS03 & 04 of the emerging Silverton Neighbourhood Plan.	Grant applied for and received from Locality to commission a Strategic Environmental Assessment Report from AECOM.

These concerns, and the identification of the need for evidence to address them, were first highlighted by us in our response of 9th April 2020 to the original Regulation 14 consultation (attached again for information). That response included copies of our previous responses to the associated SEA Screening and Scoping exercises in which we had drawn attention to our guidance on Setting, Site Allocations, and SEAs, as the basis upon which an assessment of the heritage assets relevant to the sites in question would be most likely to be successful, and reiterated that advice.

I note the consideration which you have given to the 2 sites in your report and the sincere attempt to demonstrate that they can be developed as the policies propose without causing harm to the relevant heritage assets. In doing so it is important that, as per our guidance, judgement is based upon evidence rather than assertion, and is underpinned by a demonstration that relevant assets have been identified, their significance and sensitivity to impact has been defined, and the proposals can be shown to avoid or appropriately minimise or mitigate any harm likely to be caused.

Unfortunately, and with respect, your report still doesn't contain evidence along those lines. While it may be true that lack of visibility and good design can legitimately prevent harm being caused to relevant heritage assets this needs to be underpinned by an understanding of the significance of those assets in order to demonstrate that such conclusions are valid and avoid being merely assertions.

Such exercises need not necessarily be onerous but are much more simple to achieve if carried out by someone sufficiently familiar with the heritage methodology and judgements involved. For this reason I would go back to the advice contained in our original Regulation 14 response and recommend that you liaise with the planning and conservation officers (especially the latter) at Mid Devon District Council. As a simple expedient their expertise and local knowledge will probably allow the conservation team to quickly determine

		<p>whether the proposed site allocations are likely to be acceptable from a heritage perspective, and if so what considerations or conditions might need to be accommodated. Their advice in writing can then constitute legitimate evidence with which to support the policies in the Plan or guide any modifications necessary.</p> <p>In the meantime I have set out the links to our relevant guidance below:</p> <p>https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	
MDDC	Email of 5.11.21 with attachment	<p>Thank you for consulting Mid Devon District Council on the Regulation 14 Silverton Neighbourhood Plan. Please find attached the Council's consultation response.</p> <p>If you wish to discuss any of the points raised in our response or have any other queries, please do not hesitate to ask.</p>	Acknowledged
National Highways	Email 20.9.21	<p>Thank you for providing National Highways with the opportunity to comment on the revised pre-submission draft of the Silverton Neighbourhood Plan. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN), which in this case comprises the M5 to the east of the plan area. Our predecessor, Highways England, previously provided comments on an earlier draft of the pre-submission Plan in March 2020.</p> <p>Following a review of the latest pre-submission draft we are satisfied that the proposed policies within the plan are unlikely to result in development which will adversely impact the SRN and we therefore</p>	Acknowledged

have no specific comments to make. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

Sally Parish, Planning Manager (Highways Development Management), Operations

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