

Silverton Neighbourhood Plan Committee
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Date: 3rd March 2023

Contact: Tristan Peat
Forward Planning Team Leader

Dear Olivia,

Response to the Submission consultation on the Silverton Neighbourhood Plan

Mid Devon District Council fully supports Silverton Neighbourhood Plan Steering Group with its preparation of a Neighbourhood Plan.

The following comments are made within the bounds of this formal stage in the plan making process and seek to achieve general conformity with the strategic policies of the Mid Devon Local Plan Review.

In several instances we have identified areas where we advise modification / clarification is required. We do so in order to assist the Steering Group to deliver a plan that meets the legal requirements placed upon it and to ensure that policies do not conflict with other plans, respond to community aspiration behind them and are able to be used as a basis for subsequent development management decisions as part of the development plan once adopted.

At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. These are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- e) Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

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Silverton Neighbourhood Plan submission consultation: MDDC response

Having regard to the Basic Conditions set out above, this document sets out Mid Devon District Council's formal response to this consultation. The response reiterates many of the comments made previously at Regulation 14 stage in relation to conformity issues between the Silverton Neighbourhood Plan and the Local Plan Review. They are provided in order to enable a robust neighbourhood plan that meets the basic conditions and can be utilised effectively in the determination of planning applications. Accordingly, this consultation response should be read in conjunction with the Council's Pre-Submission (Regulation 14) consultation submission dated 5 November 2021 (attached as Appendix 1).

However, we would like to draw your attention to the following policies:

Policy BE02 (Local Heritage)

Mid Devon District Council understands the requirement for proposals to demonstrate how they will 'positively conserve and enhance the unique characteristics of its location'. However, currently we can only look to preserve as a minimum. It should also be noted that where development proposals lead to less than substantial harm, that harm will be weighed against any public benefits.

Policy HS01 (Scale of Housing Development)

Policy not in conformity with the Local Plan Review as developments on the edge of the village would be outside of the settlement limits and sites of 5 or fewer dwellings would not deliver affordable housing in line with exceptions policy.

Policy HS03 (The Glebe Housing development site)

Policy not in conformity with the Local Plan Review and concerns raised by our Conservation Officer and Historic England's Historic Places Adviser have not been addressed. Conservation Officer's comments can be read in Appendix 2.

Policy HS06 (Parking Spaces on Housing Developments)

Policy not in conformity with the Local Plan Review and Parking SPD. There is a need for empirical evidence to justify the policy.

Policy TR05 (Vehicle Sharing)

This policy is not a land use policy and can therefore not be included in the neighbourhood plan.

We hope this comment is useful in progressing the plan through the Independent Examination.

Yours sincerely

Tristan Peat

Forward Planning Team Leader

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Table 1: MDDC Comments by proposed NP policy

Silverton NP Policy Options	Relevant Local Plan Review Policies	Conformity between Silverton NP/ Adopted and emerging Mid Devon Local Plan Policy. Other comments where applicable in relation to Basic Conditions.
Policy No. EN01 Retaining and Enhancing the Natural Beauty of our Parish	S1; S9; S13; S14; DM1; DM9; DM25; DM26; DM27; DM28	No conformity issues, however please note that under national and local policy (e.g. DM28) development will be permitted where its benefits clearly outweigh direct and indirect impacts.
Policy No. EN02 Rights of Way (Public Footpaths, Bridleways and Cycleways)	S1; S9; DM1; DM26	No conformity issues
Policy No. EN03 Local Green Space	S1; S9; DM24	No conformity issues. In line with national policy (NPPF para 100), further evidence and analysis may be required to justify the inclusion of these areas.
Policy No. EN04 Minimising Flood Risk	S1; S9; DM1; DM26	No conformity issues. SUDS may not be appropriate in all cases.
Policy No. BE01 Local Character and Design Standards	S1; S9; S13; S14; DM1; DM2; DM6; DM7; DM8; DM9; DM10; DM11; DM12; DM20; DM21; DM22;	No conformity issues.
Policy No. BE02 Local Heritage	S1;S7; S9; S13;S14; S11; S12; DM1; DM25	No conformity issues. However, there are a few points to note. The Policy requires proposals to demonstrate how they will 'positively conserve and enhance the unique characteristics of its location' as identified in the conservation area appraisal. Whilst we would agree with the sentiment, currently we can only look to preserve as a minimum. With regard to all heritage assets there will be a requirement to submit heritage statements which identify the assets, provide an assessment of significance and impact on the affected assets and to justify the design approach taken. This is broadly in line with the Statutory position, the Local Plan and the NPPF. It should be noted that where development proposals lead to less than substantial harm, that harm will be weighed against any public benefits.
Policy No. HS01 Scale of Housing Development	S1; S2; S13; S14; S11;S12; DM6;	Not in conformity with Policy S14: edge of village sites would be outside of settlement limits and sites of 5 or fewer dwellings would not deliver affordable housing in

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Silverton NP Policy Options	Relevant Local Plan Review Policies	Conformity between Silverton NP/ Adopted and emerging Mid Devon Local Plan Policy. Other comments where applicable in relation to Basic Conditions.
		line with the exceptions policy. However we note that the NP is providing its own exception site policy via HS05.
Policy No. HS02 Meeting Local Housing Need	S1; S3; SI1;SI2; DM6; DM8; DM10;	No conformity issues.
Policy No. HS03 The Glebe Housing Development Site	S1; S3; S5; S13; DM1; DM3; DM5; DM12; DM25	Not in conformity with Policy S1; other issues in relation to basic conditions test. Please refer to comments from MDDC conservation officer in Appendix 2.
Policy HS04 Tiverton Road Development Site	S1; S3; S13; DM1; DM3; DM12	No conformity issues.
Policy No. HS05 Community Housing	S1; S3; S13;S14; DM6	No conformity issues.
Policy No. HS06 Parking Spaces on Housing Developments	S1; DM5	Not consistent with LPR policy DM5 and Parking SPD which set a minimum parking standard of 1.7 spaces per dwelling and one charging point per ten units. Need for empirical evidence to justify policy. Should also be noted that MDDC does not count garages against the parking requirement. This is due to a low percentage of them actually being used for the storage of vehicles. Instead they tend to be used for general storage or are converted into extra living accommodation.
Policy No. BJ01 Roosters, Babylon Lane Employment Site	S1; S2; S6; S14; DM18; DM19	No conformity issues.
Policy No. BJ02 Super-fast Connectivity	S1; S8; S13; S14; SI1; SI2; DM1	No conformity issues. Provision largely dependent on third party service providers rather than developers.
Policy No. BJ03 Home Working	S1; S13; S14; SI1;SI2; DM9; DM18	No conformity issues. Be mindful of permitted development rights in relation to conversion of outbuildings.
Policy No. TR01 Non-Car Travel	S1; S13; S14; SI1; SI2; DM1; DM3	No conformity issues. Seems to duplicate elements of policy EN02.
Policy No. TR02 Pedestrian Link to Main Road	S1; S8	No conformity issues. May want to consider potential delivery mechanisms.

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Silverton NP Policy Options	Relevant Local Plan Review Policies	Conformity between Silverton NP/ Adopted and emerging Mid Devon Local Plan Policy. Other comments where applicable in relation to Basic Conditions.
Policy No. TR03 Traffic Management	S1; S13; S14; SI1; SI2; DM3; DM5	Criterion 4. and 5. are not land use policies and therefore cannot be included in the plan.
Policy No. TR04 Off Road Parking	S1; DM5	Criterion 4. is not a land use issue, and cannot be included in the plan.
Policy No. TR05 Vehicle Sharing		This policy is not relevant to land use. This policy and its Explanation should be removed from the Neighbourhood Plan
Policy No. CS01 Existing Community Facilities and Assets	S1; S13; S14; DM23	No conformity issues but unclear on policy intent. We suggest that criterion 2. of the policy should state 'proposals for community facilities are encouraged to undertake a carbon impact assessment to advise on how they can reduce their carbon emissions' to make the policy clearer.
Policy No. CS02 Existing Recreation Spaces	S1; S5; S9; DM24	No conformity issues.
Policy No. CS03 New Public Open Space	S1; S5; S13; DM24	No conformity issues. However please see comments in relation to Policy HS03.

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Appendix 1: Pre-Submission (Regulation 14) consultation submission

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Date: 5 November 2021

Contact: Tristan Peat
Forward Planning Team Leader

Dear Olivia

Response to the Pre-Submission consultation on the Silverton Neighbourhood Plan

Mid Devon District Council fully supports Silverton Neighbourhood Plan Committee with its preparation of a Neighbourhood Plan. We recognise the hard work that has been put in by the Committee and are pleased to see the progress made to date in developing the Silverton Neighbourhood Plan.

We would like to thank the Committee for consulting the authority on their Pre-Submission (Regulation 14) Neighbourhood Plan. The Council's consultation response, provided in this letter, is made within the bounds of this formal stage in the plan making process with the intention of assisting the Neighbourhood Plan Committee further with the preparation of the plan.

At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. These are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State
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Having regard to the Basic Conditions set out above, this letter sets out Mid Devon District Council's formal response to this Pre-Submission consultation. The comments set out in the attached Table 1 are provided to assist development of a robust neighbourhood plan that meets the basic conditions above and can be utilised effectively in the determination of applications by officers at Mid Devon District Council. In particular, our responses seek to achieve general conformity with the strategic policies of the Mid Devon Local Plan 2013-2033.

Planning Practice Guidance encourages Neighbourhood plan groups and the local planning authority to work together to produce complementary plans, ensuring there is alignment with Local Plan strategic policies and the Local Plan evidence base. This consultation response forms part of that joint-working by assessing the conformity between the emerging policies of the Silverton Neighbourhood Plan and Mid Devon Local Plan 2013-2033.

Overview of comments

In our previous response to the Silverton Neighbourhood Plan (NP) January 2020 version we highlighted a number of issues regarding conformity with the NPPF and Local Plan policies. The issues mainly concerned policies HS03 and HS06. We have also highlighted the fact that a number of policies were missing a specific local context. Whilst some of our suggested amendments have been incorporated, we note that some of the more substantive issues have yet to be addressed, namely in relation to the aforementioned policies. Accordingly, we have reiterated our previous advice within this response

In addition, we note that the evidence base underpinning your Neighbourhood Plan is not currently available on your website. It is very important that this documentation is accessible to the wider public to aid transparency in the plan making process and to demonstrate that the NP policies are underpinned by robust and proportionate evidence. We advise that all of the evidence which was gathered and used to inform your Neighbourhood Plan, be published on your website.

The comments set out in the attached Table 1 address each proposed NP policy in turn. We have previously provided comments on the emerging policies presented in an earlier draft of the Silverton Neighbourhood Plan (NP) August 2021 version. We note that a majority of policies remain the same in the pre-submission version of the plan so, where appropriate, our responses to this current consultation will refer back to earlier comments. As before, we would like to draw your attention to the two issues regarding policies HS06 and HS03:

- proposed Policy HS06 (Parking Spaces on Housing Developments) remains inconsistent with the Local Plan Policy DM5; please see table 1 below for further details.

- Concerns raised by our Conservation Officer and Historic England's Historic Places Adviser in relation to the assessment of historic environment impacts in particular with regard to proposed Policy HS03 (The Glebe Housing Development Site) have not been addressed; please see table 1 below for further details.

Notwithstanding the concerns raised in relation to the above two policies, in general the proposed NP provides a range of policies that effectively address sustainable development priorities and are in conformity with the policies of the Development Plan. Nevertheless we have mentioned previously that a number of the proposed NP policies lack a specific local context and largely duplicate existing Local and National policy. This poses an issue for decision makers and applicants because similar policies with the same objectives but with slightly different wording can be problematic.

Summary of comments from Conservation Officer: SEA and Policy HS03 (The Glebe Housing Development Site)

- The 2020 SEA does not lay out the statutory and policy context to be used in considering proposals that relate to heritage assets.

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- It is not clear on what methodology has been used to assess the sites to determine the level of harm that has been stated.
- In relation to policy HS03 (Site D in the SEA), there is no evidence as to how the significance of the setting of the heritage assets and the effect of development in the conservation area has been assessed against the proposal in principle, using appropriate expertise.
- There is no 'outline of the reasons for selecting the preferred approach in light of alternatives appraised'. Why for example is site F disregarded given that there is no harm to heritage there, and the considerable weight and importance that must be given to heritage?
- The comparison of sites that has been undertaken on a thematic basis does not highlight the considerable weight and importance to be given to heritage. All themes are presented with equal weight.
- It is not clear what is meant by the term 'uncertain minor negative effects'. If any evaluation using Historic England's Historic Environment Good Practice Advice in Planning (GPA3) had been undertaken these would be outlined.
- There is no support for the statement that the NP is in accordance with the CAA. The site within the conservation area (Site D) is identified to be a space of merit, and there is very little opportunity for development in this part of the conservation area.
- The allocation of Site D by the SPNP, on the basis of the contents of the 2020 SEA, is in conflict with its own policy BE02 Local Heritage and Local Plan Policy DM27. The process of allocation of HS03 has failed to provide a clear assessment of the significance and impact of the proposal on the identified heritage assets.
- The statement that development on the site has potential to contribute positively toward protecting and enhancing the local historic environment is unsupported.
- If there is uncertainty it does not seem possible to quantify the harm, and how this unquantified harm is then balanced by any form of mitigation. Indeed this is accepted in para 5.25: 'However this is uncertain at this stage'. It is not appropriate to accept harm and say it will be dealt with at a later stage, accepting that it is not clear whether it may be neutral. Heritage is an irreplaceable resource, and harm cannot be undone. There are statutory duties to be considered.
- If public benefit is to be put forward to counter the harm, then the balance cannot be properly struck until there is a full understanding of significance, the proposal is known to understand the nature and amount of harm, along with any public benefit. This would need to be considered alongside why the public benefit is site specific and cannot be provided elsewhere that is not harmful.

Full detail on the comments made by the Conservation Officer are attached in Appendix A. In light of these comments, the following recommendations are made:

Although the methodology is doubtful, the SEA report concludes that the allocation of Site D is harmful to heritage assets. In the context of the statutory and policy position where heritage assets must be given considerable weight and importance/great weight, there is insufficient justification for the harm to be set to one side and site D cannot be supported.

As it was stated in our previous response to the pre-submission version of your Neighbourhood Plan, if the Parish wish to pursue Site D as well as any other site, the 2020 SEA must be revisited with regard to heritage. It should include an understanding of the heritage assets affected by the sites in accordance with advice produced by Historic England regarding setting and a fuller discussion on the Silverton CAA with regard to the status of the site. Then each site must be re-evaluated with regard to the level of harm to heritage, having more clarity on how the site might be developed and any public benefit identified.

This evidence should then be brought forward into a discussion with all potential alternative sites. This should consider the likely significant effects on the environment/heritage associated with alternatives and an outline of the reasons for selecting the preferred approach in light of alternatives appraised. Given a sequential approach to the assessment of the sites, taking into account a weighted approach to the factors considered (i.e. considerable importance and weight to heritage), a reasoned conclusion should then be provided.

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Concluding remarks and next steps

A number of comments have been made as set out in Table 1 appended to this letter which we urge the committee to consider. In particular concerns have been raised in relation to Policy HS06 and, most significantly, Policy HS03.

In relation to comments and recommendations made by the Conservation Officer regarding Policy HS03, should the committee still wish to pursue this policy option, we would highlight the need for further technical work to fully assess historic environment impacts. The outcome of this work should then be reintegrated into an updated Strategic Environmental Assessment (SEA).

Notwithstanding the need for further assessment work to fully address the concerns raised, we are confident that a sound and workable Neighbourhood Plan can be achieved.

We look forward to working with the Neighbourhood Plan committee as the plan progresses to the submission stage. If you have any questions on this consultation response, please do not hesitate to contact the Forward Planning team.

Yours sincerely,

Tristan Peat

Forward Planning Team Leader

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Policy No. EN01 Retaining and Enhancing the Natural Beauty of our Parish	S1; S9; S13; S14; DM1; DM9; DM25; DM26; DM27; DM28	No conformity issues, however please note that under national and local policy (e.g. DM28) development will be permitted where its benefits clearly outweigh direct and indirect impacts.
Policy No. EN02 Rights of Way (Public Footpaths, Bridleways and Cycleways)	S1; S9; DM1; DM26	No conformity issues
Policy No. EN03 Local Green Space	S1; S9; DM24	No conformity issues. In line with national policy (NPPF para 100), further evidence and analysis may be required to justify the inclusion of these areas.
Policy No. EN04 Minimising Flood Risk	S1; S9; DM1; DM26	No conformity issues. SUDS may not be appropriate in all cases.
Policy No. BE01 Local Character and Design Standards	S1; S9; S13; S14; DM1; DM2; DM6; DM7; DM8; DM9; DM10; DM11; DM12; DM20; DM21; DM22;	No conformity issues.
Policy No. BE02 Local Heritage	S1;S7; S9; S13;S14; S11; S12; DM1; DM25	No conformity issues. However, there are a few points to note. The Policy requires proposals to demonstrate how they will 'positively conserve and enhance the unique characteristics of its location' as identified in the conservation area appraisal. Whilst we would agree with the sentiment, currently we can only look to preserve as a minimum. With regard to all heritage assets there will be a requirement to submit heritage statements which identify the assets, provide an assessment of significance and impact on the affected assets and to justify the design approach taken. This is broadly in line with the Statutory position, the Local Plan and the NPPF. It should be noted that where development proposals lead to less than substantial harm, that harm will be weighed against any public benefits.
Policy No. HS01 Scale of Housing Development	S1; S2; S13; S14; S11;S12; DM6;	Not in conformity with Policy S14: edge of village sites would be outside of settlement limits and sites of 5 or fewer dwellings would not deliver affordable housing in

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Silverton NP Policy Options	Relevant Local Plan Review Policies	Conformity between Silverton NP/ Adopted and emerging Mid Devon Local Plan Policy. Other comments where applicable in relation to Basic Conditions.
		line with the exceptions policy. However we note that the NP is providing its own exception site policy via HS05.
Policy No. HS02 Meeting Local Housing Need	S1; S3; SI1;SI2; DM6; DM8; DM10;	No conformity issues.
Policy No. HS03 The Glebe Housing Development Site	S1; S3; S5; S13; DM1; DM3; DM5; DM12; DM25	Not in conformity with Policy S1; other issues in relation to basic conditions test. Please refer to comments from MDDC conservation officer above.
Policy HS04 Tiverton Road Development Site	S1; S3; S13; DM1; DM3; DM12	No conformity issues.
Policy No. HS05 Community Housing	S1; S3; S13;S14; DM6	No conformity issues.
Policy No. HS06 Parking Spaces on Housing Developments	S1; DM5	Not consistent with LPR policy DM5 and Parking SPD which set a minimum parking standard of 1.7 spaces per dwelling. Need for empirical evidence to justify policy. Should also be noted that MDDC does not count garages against the parking requirement. This is due to a low percentage of them actually being used for the storage of vehicles. Instead they tend to be used for general storage or are converted into extra living accommodation.
Policy No. BJ01 Roosters, Babylon Road Employment Site	S1; S2; S6; S14; DM18; DM19	No conformity issues.
Policy No. BJ02 Superfast Connectivity	S1; S8; S13; S14; SI1; SI2; DM1	No conformity issues. Provision largely dependent on third party service providers rather than developers.
Policy No. BJ03 Home Working	S1; S13; S14; SI1;SI2; DM9; DM18	No conformity issues. Be mindful of permitted development rights in relation to conversion of outbuildings.
Policy No. TR01 Non-Car Travel	S1; S13; S14; SI1; SI2; DM1; DM3	No conformity issues. Seems to duplicate elements of policy EN02.
Policy No. TR02 Pedestrian Link to Main Road	S1; S8	No conformity issues. May want to consider potential delivery mechanisms.

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Silverton Neighbourhood Plan pre-submission consultation: MDDC response

Silverton NP Policy Options	Relevant Local Plan Review Policies	Conformity between Silverton NP/ Adopted and emerging Mid Devon Local Plan Policy. Other comments where applicable in relation to Basic Conditions.
Policy No. TR03 Traffic Management	S1; S13; S14; SI1; SI2; DM3; DM5	No conformity issues.
Policy No. TR04 Off Road Parking	S1; DM5	No conformity issues.
Policy No. CS01 Existing Community Facilities and Assets	S1; S13; S14; DM23	No conformity issues.
Policy No. CS02 Existing Recreation Spaces	S1; S5; S9; DM24	No conformity issues.
Policy No. CS03 New Public Open Space	S1; S5; S13; DM24	No conformity issues. However please see comments in relation to Policy HS03.

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Appendix 2: MDDC Conservation Officer Comments

The overall vision of the plan seeks to protect the special character of the country setting and ancient heritage, and this runs through the document taking us to Policy BE02 headed 'Local Heritage', but would clearly intend to encompass national designated assets, such as listed buildings, but taken into account at a local level.

Policy HS03 relates to an area of land to the south of the village. The site includes land in the conservation area and some land to the south beyond it.

The Parish Church is Grade I listed and has 3 grade II listed buildings associated with it. To the east and west of the green are further listed buildings, Nettlecombe House, Nos 6 & 8 Church Road and the gate piers to No 6. The land rises up from the site with the Church on higher ground with views to the south. The site is highly visible from the Church yard. The site is within the setting of the listed buildings, including the Grade I listed Church and is mostly inside the conservation area.

The Conservation Area Appraisal (CAA) describes the land to be a space of merit, and identifies key views, although these are not exhaustive. The character assessment for this part of the conservation area states there is very little opportunity for development in this part of the conservation area.

The site shown is about 10,600 square meters and the proposed development is 5 houses, community woodland and a play/recreation space.

I have looked at the SPNP website. There are a number of iterations that assess the impact of development of this site which all conclude that there would be a negative impact on heritage assets, although the methodology is questionable. The most recent was in February 2020 which is the SEA which should supersede previous attempts at assessing harm. Site D, as defined in the 2020 SEA is the site that most interests me. This is the site promoted in HS03 and CS03 by implication.

The area shown on Fig 4.1 of the 2020 SEA for Site D is a different shape to that within the NP 3rd Consultation Version. Fig 4.1 site is wholly within the conservation area, though later at 4.23 the report states that part of the land is in the conservation area (I would say about two thirds is within the conservation area, one third beyond but within it setting). I am assuming that Fig 4.1 in the 2020 SEA is incorrect with respect to Site D.

The methodology of the 2020 SEA with regard to the assessment of impact on the heritage assets and their settings is not clear. There is no reference to 'The Setting of Heritage Assets' by Historic England or reference to Statute, or the NPPF.

There seems to be little beyond a repetition of the CAA and no record of any site visit either physical or virtual. There is no discussion regarding significance of any of the heritage assets. 2020 SEA fails to demonstrate a proper understanding of significance with regard to the setting of listed buildings.

The Assessment of Reasonable Alternatives is discussed in section 4. Section 4.1 states that In accordance with the SEA Regulations, the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

Each site is assessed against range of criteria, and a matrix formed. There is a discussion regarding the relative merits of each site on a theme basis against the themed criteria but no discussion in the round for each site. There is no comparison of the sites in the round and no justification as to why the two sites are preferred

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and the other 4 are rejected. The report fails to outline the reasons for selecting the preferred sites, and gives all criteria equal weight which is contrary to the interpretation of the weight that must be given to heritage over and above the other criteria by statute and the NPPF. This is especially important when they conclude of the preferred Site D, with regard to the heritage theme that:

‘Uncertain minor negative effects are therefore anticipated due to the sensitivity of the historic environment and the potential for the site allocation to adversely impact upon the Silverton Conservation Area. It is however noted that given the scale of the site, any adverse effects are unlikely to be significant, and that any mitigation provided may result in a residual neutral effect. However, this is uncertain at this stage.’

The report appears to be accepting its limitations and lack of a proper evaluation of the site from a heritage perspective and is therefore concluding that there is a minor adverse effect but isn't clear what or why there is that effect at that level. It could well be higher.

It also fails to outline the weighting that needs to be given to heritage though Statute – considerable weight and importance – and the NPPF – great weight - in the decision making process. There is no advice on this matter, and I'm inclined to conclude that this statutory matter was not in the mind of the author in undertaking any balancing exercise that they did.