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**From:** [REDACTED]  
**Sent:** 29 August 2023 21:27  
**To:** Planning Consultation (DPD)  
**Subject:** Silverton Neighbourhood Plan - Regulation 16 Consultation - Formal response

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear [REDACTED],

Thank you for inviting us to comment on the Regulation 16 consultation of the Silverton Parish Neighbourhood Plan (email 17 July 2023).

We have reviewed the revised Strategic Environmental Assessment (SEA), published in September 2022 alongside the Regulation 16 draft of the Neighbourhood Plan. We are pleased to see that our previous concerns, over the absence of a robust heritage evidence-base, have now been addressed. We welcome the detailed study of the impact of the proposed site allocations A (Tiverton Road) and D (The Glebe) on adjacent heritage assets.

According to the revised SEA, development of Site A (Tiverton Road) is likely to have a low, adverse impact on a number of medium significance heritage assets. This suggests a relatively benign outcome and seems to justify Policy HS04, which had previously given us some concern, due to the absence of a robust heritage study.

Conversely, the revised 2022 SEA has highlighted some further cause for concern regarding Site D (The Glebe). At the Regulation 14 stage, we were concerned that the site selection methodology had resulted in promoting a site that may well have potential to harm significant heritage assets. Indeed, the revised SEA study does reveal the potential for medium adverse impact to a number of medium and high significance heritage assets. Such impact includes the setting of the Conservation Area (medium significance) and the setting of the grade I listed Church of St Mary the Virgin (high significance). However, since the regulation 14 draft consultation, the wording of Policy BE01 (Local Character and Design Standards), Policy BE02 (Local Heritage) and Policy HS03 (The Glebe Housing Development Site) have been strengthened to help conserve and enhance the heritage assets.

Clearly, it would be better to select a site that had no risk, or only a low risk, of harming heritage assets. However, we understand that the other potential sites that were considered for development have indeed either come forward for development: West's Garage (2 new homes) and Old Butterleigh Road (5 new homes); or, in the case of "Roosters" is now being supported for employment use.

Given that the desired, additional housing provision seems to have already been delivered, the Neighbourhood Plan Steering Group may now be in a position to simply remove Policy HS03 (The Glebe) from the Plan. In our view, this is likely to be the most reliable way of avoiding any potential harm to the Conservation Area; or to the other high-significance (grade I) and medium-significance (grade ii) heritage assets.

However, the Conservation Officer may feel that the strengthened wording of Policy BE01, Policy BE02 and Policy HS03 are now adequately robust to guide the proposed development towards only "minor negative effects". We recognise that these policies are now robustly supported by the new, detailed evidence-base, contained within the 2022 SEA.

I hope that our comments have been helpful. We commend the Neighbourhood Plan Steering Group for the dedication required to arrive at this stage in the process and wish them well in arriving at a Made Plan.

Kind Regards,

[REDACTED]

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