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Sent: Friday, April 12, 2024 10:08 PM
To: Planning Policy <PlanningPolicy@eastdevon.gov.uk>; Angela King <AKing@eastdevon.gov.uk>
Subject: Clyst Honiton Neighbourhood Plan - Regulation 16 Consultation - Formal Response

Dear Angela,

Thank you for inviting us to comment on the Regulation 16 consultation of the Clyst Honiton Neighbourhood Plan (29 February 2024).

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. 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. On this occasion, there may be potential risk.

We note that the draft Neighbourhood Plan makes a number of specific site allocations for development. Given this, we would usually expect to see a rigorous, heritage evidence base and justifications that explore the potential risk of harm to the various heritage assets, at each of the named sites. It would be normal to have a brief assessment, at each site and a narrative, with recommendations as to how any proposed development might avoid, or mitigate potential harm.

At the regulation 14 consultation stage, we expressed concern with the lack of a suitably robust heritage evidence-base and clear justification for some of the site allocations for development. We also suggested that more legible maps might better reveal the relationship between the heritage assets, potentially at risk of harm, and the proposed development. Furthermore, we suggested revisiting the heritage evidence-base and justifications in order to strengthen them. It seems that our concerns have still not yet been addressed.

It is common for Neighbourhood Plans to include an entire chapter dedicated to Heritage. The Clyst Honiton Plan does not have a chapter and doesn't appear to mention the protection of heritage in the policies where one would expect to find such detailed consideration.

The policies that do not seem well-evidenced, or clearly justified are the following:

Policy C1: Community Facilities and Services

The Neighbourhood Plan identifies the following community facilities which make an important contribution to creating a cohesive and inclusive local community:

1. St Michaels and All Angels Church.
2. The Duke of York Public House.
3. The Exeter Inn Public House.

4. The Parish Field.

Policy C3: New Community Facilities and Services

Proposals to bring forward new community facilities at the River Clyst Park (Policy NE3)

Policy E3: Opportunities for New and/or Improved Business Development in Zone A

Three business development sites. This policy does not mention heritage assets. The heritage assets have not yet been clearly mapped

Policy SA1: Slate and Tile Site. Residential allocation

This policy does not mention heritage assets. The heritage assets have not yet been clearly mapped.

It is not the role of Historic England to make a detailed assessment concerning potential harm at each site, but simply to flag possible weaknesses in the evidence-base and/or lack of justification for development.

We continue to be concerned by the weak evidence-base and lack of clear justification for development presented in the submitted Neighbourhood Plan and suite of supporting documents. However, ultimately it is for the Local Authority Conservation Officer to make a decision as to whether they are confident that heritage assets are being adequately protected from harm, which may arise from the policies proposed by the Neighbourhood Plan.

We have no further comments to make at this point in time. I hope that our comments have been helpful.

Kind Regards,

Alan

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