FAO JOSH ASHWIN

Dear Josh

Mon 21/12/2015 16:11

We received a letter dated 5th November from Wroughton Parish Council advising us of the consultation, through your authority, on the submitted version of the Wroughton Neighbourhood Plan.

We have previously commented on a draft version of the Plan in the spring of this year (see attached) as well as responded to consultations on the associated SEA process.

In broad terms, having advised the community on a range of initial issues, we have been content to defer to your authority to advise on the broad compliance of the emerging Plan with national and local policy.

This response – with apologies for its late submission – reiterates that point. The focus of our attention would be on site allocation policies and in that respect we only wish to highlight that your authority should be satisfied that those provisions made under policies DP1-7 in the Plan do not cause harm to heritage assets.

Kind regards

David

David Stuart | Historic Places Adviser South West

FAO Joyce Holman

Fri 13/02/2015 15:43

Thank you for your consultation on the draft Wroughton Neighbourhood Plan.

Our apologies for not submitting this response by 11th February but we hope that our comments can still inform the preparation of the Plan.

We have in fact only a few summary observations:

- 1. We are pleased to note the value which the community places on the area's heritage and the policies for its protection and enhancement.
- 2. It will be important to ensure that in advocating particular sites for development there is a sufficiently robust evidence base to demonstrate that such proposals will not cause unacceptable harm to heritage assets.
- 3. We applaud the intention in the drafting of policies HE1 4 to protect the area's heritage assets. However, regrettably such an absolute prohibition on

proposals which cause harm to heritage assets may not be in accordance with the NPPF. It may therefore be necessary to consider introducing a criteria-based approach to the wording of such policies.

- 4. It is also not clear why the policies are so exclusive. Chapter 8 references the existence of the Conservation Area for example, and its protection and enhancement is a stated objective. However, this is a general provision for heritage assets within the NPPF and might therefore reasonably apply to all such assets within the Plan area. Reference is made to Wroughton's "many listed buildings" and the impression could be formed that those not referred to specifically in the policies are by implication not seen to have value.
- 5. We would as a consequence advise you to liaise with planning and conservation officers at Swindon Borough Council on the matters raised above. This should ensure that the Plan can demonstrate the necessary compliance with national and local policy, recognises and respond positively to the area's heritage, and secure the protection and enhancement of its significance.

Otherwise, we would extend our congratulations to your community on the progress made with the Plan to date and wish you well in taking it through to completion.

Kind regards

David Stuart

David Stuart | Historic Places Adviser