

Planning Policy Vale of White Horse District Council 135 Eastern Avenue Milton Park Abingdon, OX14 4SB. Our ref: Your ref:

Telephone: Fax

28th March 2019

Dear Sir or Madam,

Proposed Draft Main Modifications Consultation

Thank you for your e-mail advising Historic England of the consultation on the Proposed Draft Main Modifications to the Local Plan Part 2. We are pleased to make the following comments.

MM4: We welcome and support the proposed addition of "THE HISTORIC CENTRE OF SHIPPON LIES TO THE SOUTH OF DALTON BARRACKS. IT REMAINS RELATIVELY INTACT AND STILL SURVIVES AS A HISTORIC VILLAGE WITH A RURAL APPROACH FROM THE WEST ALONG BARROW ROAD. DEVELOPMENT ON THE SOUTHERN PART OF THE SITE SHOULD RESPECT THE HISTORIC CHARACTER OF SHIPPON AND ITS RURAL APPROACH" to paragraph 2.62.

MM21: We welcome and support the proposed modifications to Development Policy 36: Heritage Assets and its supporting text, which reflect the discussions between Historic England and the Council.

MM22: We welcome and support the proposed modifications to Development Policy 38: Listed Buildings, which reflect the discussions between Historic England and the Council.

MM23: This proposed modification does not accurately reflect paragraph 194 of the National Planning Policy Framework which states that "<u>Any</u> harm to, or loss of, the significance of a designated heritage asset.....should require clear and convincing justification" and "Substantial harm to or loss of assets of the highest significance, notably scheduled monuments....., should be <u>wholly</u> exceptional" (our emphasis). Also paragraph 133 is paragraph 195 of the revised Framework.

We therefore suggest that the modification should be:

"Nationally......in situ. Development proposals that would lead to harm of the significance of such remains will only be permitted where it is clearly and convincingly demonstrated that the harm or loss is necessary to achieve public benefits that outweigh that harm or loss. Where that harm would be substantial or there would be total loss of significance proposals will only be permitted where it can





be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or all of the circumstances in paragraph 195 of the NPPF apply."

However, we welcome the proposed modification to refer to the Historic Environment Record.

We hope these comments are helpful.

Thank you again for consulting Historic England.

Yours faithfully,

Martin Small Principal Adviser, Historic Environment Planning (Bucks, Berks, Oxfordshire, Hampshire, IoW, South Downs NP and Chichester)



