

Mark Harrison

From: [REDACTED]
Sent: 06 February 2026 19:00
To: Mark Harrison
Subject: Siddington pre-Reg. 14 Neighbourhood Plan - HRA/SEA Screening Opinion

[REDACTED]
Dear Mark

Thank you for your consultation on the SEA Screening for the emerging Siddington Neighbourhood Plan.

We also appreciate having sight of the current draft Plan as this provides us with the opportunity to familiarise ourselves with the community's policy aspirations and identify any matters which it would be useful to accommodate in its ongoing preparation.

The focus of our attention when considering SEA Screenings is proposals to allocate sites for development as experience has shown that these have the greatest potential to generate impacts on the historic environment.

We note that the Plan in policy S6 states that development will be supported at the Old Talland School of Equitation where it will ensure the conservation and enhancement of existing heritage assets on site and protect the setting of those nearby.

The SEA Screening Report states that the Plan "does not seek to allocate land for residential or other forms development" (Table 2, p24) and intimates that this policy is more about the heritage of the site.

In terms of how the policy is interpreted, it identifies a specific site and has drawn a line round it to identify its extent and stated that development of the site will be acceptable provided it ensures the future of the relevant heritage assets in a sensitive manner. The policy is not specific in identifying the nature or quantum of any development and indicates that development is regarded as an enabling tool to deliver against that objective.

Our view is that it would be quite legitimate to conclude that this is tantamount to a site allocation and given the concentration of high value heritage assets involved development in some form could well generate a likelihood of significant environmental effects. Indeed, given the policy's objective the conservation and enhancement of existing heritage assets would involve changes to the status quo and while these are intended to be positive they would still constitute "significant environmental effects" in its neutral SEA application.

At the same time, we note the non-specific nature of the policy and the criteria which are intended to ensure that any change is respectful of the significance of those heritage assets. And recent withdrawal of central funding imposes a challenge on Plan communities to produce a full SEA without the dedicated resources now to do so. In this case, a full SEA would be predicated only upon policy S6 and so it is reasonable to ask whether its requirement would be a reasonable expectation.

In heritage terms, there are other ways of demonstrating with evidence that policy S6, and thereby the Plan generally, can be delivered without causing harm to the historic environment in accordance with overarching national and local policy for the protection and enhancement of the

historic environment. We might also advise that thought be given to a tightening up in the policy of the criteria in heritage terms which need to be satisfied to fully convey here, as much as in the supporting text, the high value and multiplicity of the significance of the site and its setting. We would encourage the community to liaise with your authority's heritage team to facilitate this outcome.

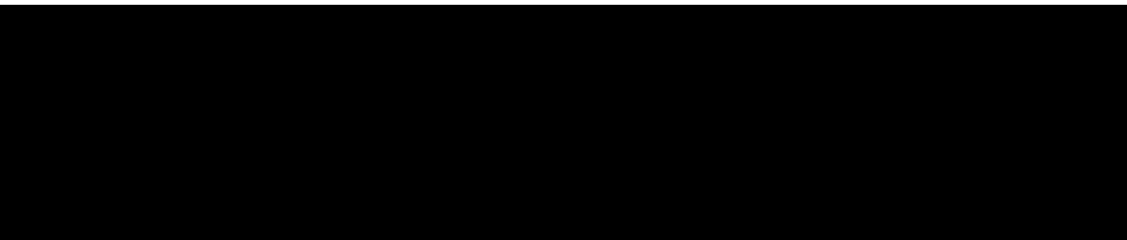
On that basis we have no objection to the view that a full SEA is not required.

There are no other issues associated with Plan and its policies that we would flag up here or deem likely to want to comment on at future stages in its progress. We do however look forward to reviewing policy S6 and its supporting information when further consultations allow.

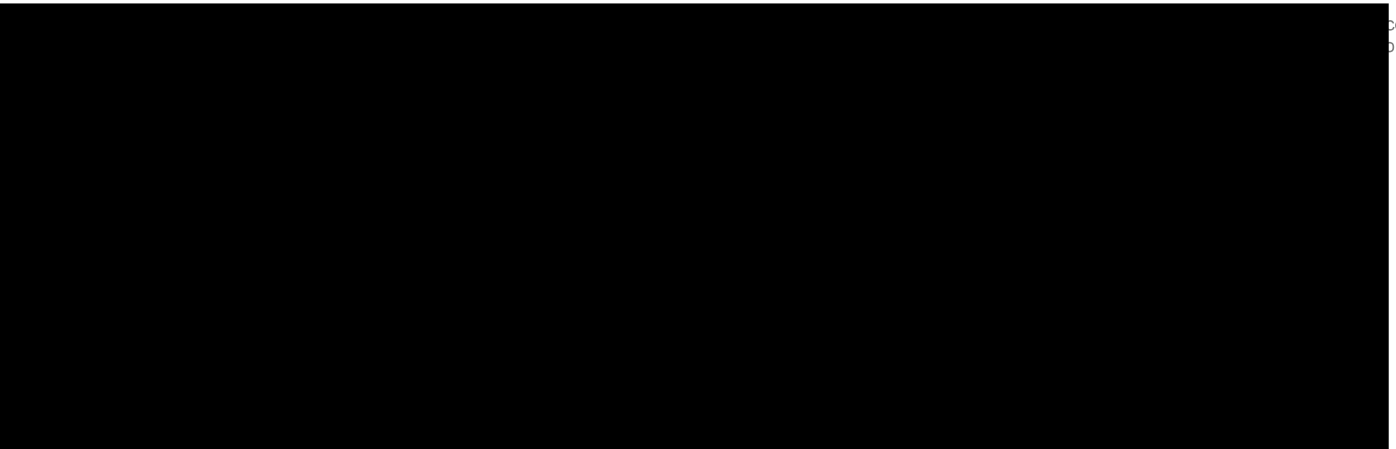
Kind regards

David

David Stuart | Historic Places Adviser



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Dear Consultee,

Please find attached a HRA/SEA Screening Opinion for the Siddington pre-Reg 14 Neighbourhood Plan (also attached).

Please could you **provide comments** on the Screening Opinion **by Friday 6th February 2026**.

Any queries, please get in touch.

Kind Regards,

Mark

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