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12 October 2015

Dear Sir

STATFORD-UPON-AVON NEIGHBOURHOOD PLAN - PRE-SUBMISSION CONSULTATION

Thank you for the invitation to comment on the above Neighbourhood Plan. Overall Historic England considers that the Plan takes a positive approach to the historic environment and is a well-considered, concise and fit for purpose document.

Historic England is supportive of the content of the document and we applaud the comprehensive approach taken to the historic and natural environment and the wide range of well justified policies that are clearly focused upon "constructive conservation". We are particularly pleased to see the emphasis on local distinctiveness including non-designated heritage assets and upon the importance of design- whether relating to shop fronts or new build development, where requirements for master planning and the use of "Building for Life 12", Design Codes and a Design Review Panel are highly commendable.

We would, however, question the utility of Policies BE11-12 since these designated heritage assets are already stringently protected by specific legislation, such that the inclusion of policies in the Neighbourhood Plan would seem to offer no additional benefit.

By contrast, we note the absence of any Policy related to archaeological remains, although the rubric of the Plan makes it clear that the core of Stratford-upon-Avon has its' origins in a medieval planned town. The following policy may be appropriate and has already been adopted in a number of "made" West Midlands Neighbourhood Plans, viz:

"New development must take account of known surface and sub-surface archaeology, and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology must not be taken as proof of absence".

Finally, on a minor point we note that Policy TC 10 (by contrast with Policy TC 9) suggests in the final sentence that piecemeal development "should" be resisted rather than "will" be resisted- the latter wording would seem to be entirely justifiable in our view.

I hope you find this advice helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully

Pete Boland

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