

Appendix 1

Draft Box Neighbourhood Development Plan – Approved responses from Box Parish Council to comments from the Box Parish Neighbourhood Plan Action Group following Planning Committee and Full Council on February 16 and 26 2026 respectively

Background

Comments have been made from and on behalf of the Box Parish Neighbourhood Plan Action Group (referred to as ‘the Action Group’ from here on) on several matters linked to the draft Box Parish Neighbourhood Development Plan.

The comments are focussed on the proposal in the draft Plan to identify non-designated heritage assets in the Box Hill area of the Parish and to identify a wider area at Box Hill as a proposed Area of Local Heritage Importance.

The attached schedule has two elements :

- **Part One** – Responses to matters raised in the submission to the Parish Council from the Action Group dated January 9 2026 following the engagement meeting in the Pavilion in Box on January 5 2026

Part Two – Responses to matters raised by the Action Group in its previous submissions and items

Care has been taken to respond as fully as possible to the matters raised in order to assist the Action Group.

In some instances, because some of the Action Group comments have been raised in more than one question this results in some repetition of response(s) in more than one item.

The opportunity has also been taken in providing these responses to provide some wider background to the draft Plan. This necessarily results in this response document being very lengthy.

Part One

This part of the document identifies the comments from the Box Parish Neighbourhood Plan Action Group provided to the Parish Council after the engagement event on January 5 2026

Item	Comments in the submission dated January 9 2026	Box Parish Council response
Intro	<p>We are writing on behalf of local residents and members of the Action Group to formally consolidate many points and also raise a number of concerns regarding the development of the Neighbourhood Plan, in particular Part B and the proposed identification of Non-Designated Heritage Assets and areas.</p> <p>These points reflect issues consistently raised at the recent engagement meeting and in subsequent correspondence. They are intended to support a more transparent, evidence-based, and inclusive process going forward.</p>	<p>Overview comments from the Parish Council</p> <p>The Parish Council is undertaking the preparation of the draft Box Parish Neighbourhood Development Plan (from here on referred to as ‘the draft Plan’).</p> <p>The Parish Council has commitment to engaging with the community across the Parish and listening to what it says as it takes this work forward.</p> <p>Several opportunities have been provided for the community to learn about and influence the draft Plan at several informal events across the Parish.</p> <p>There will be more opportunities for the community to comment through periods of statutory engagement and consultation on the draft Plan.</p> <p>All the events so far have been publicised through the Parish Council’s website, the Parish magazine and social media platforms. The Parish Council has set up a specific Face Book ‘platform’ for the Neighbourhood Plan and has used this to</p>

		<p>provide specific updates on topics, on-going work and progress. The platform included an Introduction to the project in May 2019 and has included progress updates and topic specific matters in the period since then. In October 2021 it included a link to Government guidelines on the preparation of neighbourhood plans. The most recent update was in August 2025 and it included reference to the SEA work (see item no.4, below) and the work to prepare a list of proposed non-designated heritage assets (see item no. 1, below)</p> <p>County Councillors and local MPs are kept apprised of progress with the draft Plan.</p> <p>Wiltshire Council is updated on progress with preparing the draft Plan.</p> <p>The community in the Parish is generally well-informed and keen to be involved in matters. The Parish Council has been encouraged that preparation of the neighbourhood plan for Box Parish has been well-received.</p> <p>In line with planning guidance, the draft Plan has been positively prepared and responds to issues across the Parish. Care is being taken to make sure that it has a solid and robust evidence base across each of its topics. It will be well-suited to meeting requirements across the Parish for the period ahead.</p> <p>The draft Plan has a comprehensive and well-balanced suite of policies dealing with housing, design quality, heritage, flooding, renewable energy, the natural environment, local green spaces, dark skies, bats, community facilities, employment and getting around. It does not have an over-riding focus on any specific matter since it looks to address a range of topics the community has indicated as important.</p> <p>There has been positive feedback from the community as work has progressed. Residents and businesses have supported the work with input into the evidence base being developed to support and inform the draft Plan.</p>
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		<p>Several members of the Steering Group (and the Parish Clerk) preparing the draft Plan met with Box Hill residents in Box on January 5 2026. This reflects the Parish Council's intention that it is prepared in a manner that affords transparency and accountability to the community.</p> <p>At the event, a resident read out a prepared statement and then handed this to the Parish Clerk. The Steering Group have carefully reviewed the statement and concluded that the responses below are also appropriate to this as it raises no additional matters to those lodged by the Action Group (both before and after the event). The responses which follow in this document therefore also respond to the statement.</p> <p>The event provided a valuable and important opportunity for the Steering Group to learn more about the views of a small group of residents with interests in a specific part of the Parish and who have raised concerns about a particular topic in the draft Plan.</p> <p>All Councillors have received a copy of the submission made on behalf of the Action Group (provided to the Clerk to the Council on January 9 2026) in the light of Action Group comments about transparency and accountability.</p> <p>Some concerns raised by the Action Group may have arisen because of unfamiliarity with the wider work done by the Parish Council on the topic of identifying non-designated heritage assets that are proposed to be recognised in the draft Plan including a wider area as an Area of Local Heritage Importance focussed on Box Hill.</p> <p>The Parish Council has added a key document on this to the Parish Council website and Action Group members are advised to read this alongside the following commentary.</p>
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1	<p>Purpose, objectives, and justification</p> <p>There is a lack of clarity regarding the specific problem Part B is intended to address and the outcomes it seeks to achieve. General statements about “celebrating history” do not constitute clear objectives. Previous public engagement exercises have not identified heritage or asset designation as a primary concern for residents, and this raises questions about how the current focus of Part B aligns with earlier community feedback.</p> <p>Furthermore, there is no evidence from public consultation that residents believe existing protections—such as</p>	<p>The Action Group comments for this question (and much of the subsequent ones) focuses on Part B of the draft Plan.</p> <p>It may assist if the Parish Council firstly set out some background to the draft Plan including the roles of Parts A and B so that there clarity on these matters and the Action Group can understand how the draft Plan is going forward.</p> <p>The comments following will also refer to the draft report dealing with Locally Valued Non-Designated Heritage Assets. This identifies the specific features that the draft Plan is proposing to identify as non-designated heritage assets including the individual features around Box Hill and the proposed Area of Local Heritage Importance.</p> <p>The comments will clearly ‘signpost’ specific sections in the draft report for proposed non-designated heritage assets where the Action Group will see commentary which will explain how the work has been done and the basis for it as well as explanatory text about each of the assets proposed to be identified.</p>

National Landscape and Green Belt designations—are failing to protect the heritage of the area. In the absence of an identified deficiency in current policy protections, the rationale for introducing additional heritage-based planning constraints has not been clearly demonstrated.

In addition, the selective designation of certain parts of Box Village, Box Hill and Wadswick appears to disproportionately affect a subset of homeowners, while the wider heritage value of surrounding areas is not similarly recognised. This raises concerns about fairness, consistency, and proportionality in the approach being taken, particularly where the heritage significance of the broader landscape is acknowledged but not reflected in the proposed designations.

There has been no counterfactual analysis demonstrating why these designations are necessary, what risks they mitigate, or whether the same objectives could be achieved through less restrictive means. Without this, it is difficult to understand why further constraints are being proposed where neither a clear community mandate nor

What is Part A

The draft Plan includes text in the Introduction which clearly explains the structure of the overall draft Plan including the roles of Parts A and B and the various evidence base documents.

Part A of the draft Plan sets out a Vision for the Parish through to 2038 together with a number of objectives to achieve it. A suite of planning policies is set out intended to deliver the Vision.

This part of the draft Plan takes account of :

- the necessity of meeting ‘basic conditions’ set out by Government
- the need for robust evidence about the Parish; and
- outcomes from engagement and consultation

For the draft Plan to satisfy ‘basic conditions’ it must accord with wider planning policies and strategies including those in the Government’s national planning policy framework as well as those of Wiltshire Council. The Steering Group audits the draft Plan as it is prepared against these to ensure this.

A wide range of work has been done from an early stage in the project to understand the Parish and to gather information across many topics and from a range of sources so that there is a robust basis for the planning policies in the draft Plan.

As part of this, an earlier strategy called the Box Communities Plan (2013-2020) has been revisited. This was always seen as a ‘tool’ that would assist and inform the preparation of a future neighbourhood plan for the Parish. Where appropriate, many of the issues mentioned in the document have been taken into account in

	<p>a defined problem statement has been established.</p> <p>Due to time constraints, the BPC didn't release the results from the ~8 engaged households of The Tynings,. It would be beneficial to deliver these results.</p>	<p>preparing the draft Plan. It will be seen that it referred to several social and community matters as well as matters linked to travel and movement.</p> <p>A range of informal engagement and consultation opportunities have been provided throughout the project so that the community can learn about, understand and comment on the preparation of the draft Plan. These will continue as the draft Plan progresses into its more formal stages after the SEA work.</p> <p>The Parish Council has facilitated several events itself and it commissioned a specialist community company (Lemon Gazelle) to carry out engagement in 2019/2020.</p> <p>Engagement events facilitated by the Parish Council with the Parish community that took place in Box and Rudloe and at the Box 'Revels' event in Spring 2023 were particularly important. These events were publicised on the Parish Council Box Parish Neighbourhood Development Plan Face Book 'platform' in February and April 2023.</p> <p>Both events showed how the draft Plan was being taken forward, continued evidence building and sought views on the emerging draft Vision and objectives. They also encouraged people to join the work.</p> <p>The display material at both events clearly identified that heritage matters were part of the work and that it was proposed to identify non-designated heritage assets.</p> <p>Following these events, a draft Vision and Objectives were considered by the Parish Council in May 2023. They were approved as the basis for taking the draft Plan forward.</p> <p>The Objectives approved by the Parish Council included :</p>
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B) Sense of place, local character and *heritage*

The supporting text to this says :

‘Ensuring that where new development is introduced, it is of high quality and sympathetic to its context maintaining a sense of place, and enhancing identified local character and cherished identity of the Parish’.

The Vision and Objectives approved by the Parish Council have been on its website since they were adopted in 2023. This has enabled the community to see the ‘direction of travel’ for the emerging draft Plan as progress is made toward Regulation 14 stage consultation.

Since then there have been opportunities for the community to further discuss the draft Plan (including its objectives) at engagement events including Box ‘Revels’ (2024 and 2025) and the Annual Parish Meetings or by contacting the Parish Council and / or Steering Group. These events were publicised on the Box Parish Neighbourhood Plan Face Book ‘platform’.

There have been no indications that the community regards the Vision and objectives as inappropriate.

The Action Group has suggested in this item that in earlier consultation work the community did not identify ‘heritage’ as a ‘primary concern.’

This is based on its interpretation of a single and specific outcome from the Lemon Gazelle survey in 2019. Respondents were asked what would be ‘*Extremely important*’ priorities for the Environment and Open Space over the next 10-15 years. The Action Group say that ‘the built and historic environment’ were rated lower than several other topics.

		<p>This is a very selective interpretation of the outcomes from the Lemon Gazelle work. It overlooks that the Lemon Gazelle document shows that ‘the built and historic environment’ was regarded as an ‘<i>Important</i>’ priority for the next 10-15 years by more residents than the other topics identified.</p> <p>The Parish Council considered that both responses for the ‘built and historic environment’ needed to be taken into account in preparing the draft Plan. It would have been invalid to omit reference to ‘heritage’ just on the basis of the responses to the community identifying other ‘Extremely Important’ priorities before it. Conversely, the responses to ‘Important’ priorities which placed it above other topics warrant reference to ‘heritage’ being included.</p> <p>The Action Group should also be made aware that Lemon Gazelle prepared a later document to inform the preparation of the draft Plan.</p> <p>This was an Issues report (2020) and its purpose was to show that the outcomes from the initial engagement would have to be taken forward in regard to the wider planning policy context. There are extensive and very clear references to the <i>historic environment</i> in the section dealing with Environment and Open Space and the several Government and Wiltshire Council policies that would need to be taken into account in preparing the draft Plan.</p> <p>Furthermore, the report summary pointed out that the Steering Group would have to help residents understand that the draft Plan would not be able to operate without boundaries ‘however supported or desired a particular option or policy direction may be.’</p> <p>The Parish Council would also say that whilst the outcomes from early stage informal consultation and engagement may rightly assist the process of preparing a plan, they would not normally be the <i>sole determinant</i> of what a plan will contain and its approach.</p>
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		<p>The preparation of the draft Plan has also recognised that it was necessary for a balanced and rounded approach to be taken that took account of other important factors as well as early responses.</p> <p>Importantly, all the work on the draft Plan has recognised the importance of it meeting legislative 'basic conditions' and achieving 'sustainable development' as this will be independently scrutinised later in the plan process. Recognising the importance of the historic environment in the draft Plan (and including reference to it in Objective B) is consistent with the environmental objective in the National Planning Policy Framework which references 'heritage'. (Section 2 Achieving Sustainable development Para. 8 (c)).</p> <p>The early evidence building work confirmed that the Parish has a very extensive number of heritage assets which are already identified and afforded statutory protection including several Conservation Areas and listed buildings. The Parish Council considers that it would be wholly inappropriate for the draft Plan not to recognise heritage in its objectives when regard is had to this.</p> <p>In conclusion, it would be inappropriate for the draft Plan's content to be driven only by comments made during engagement and consultation especially where such comments are taken out of context and can be read in different ways.</p> <p>This is especially the case where such comments would give rise to uncertainty and very significant risk about the draft Plan meeting 'basic conditions'. The strong likelihood is that if a plan simply responded to community comments to the exclusion of reflecting (1) requirements in national policy and (2) robust evidence then the outcome from the latter stages of the plan's preparation (including statutory consultation and independent Examination) would be that the plan was 'unsound'.</p>
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The Parish Council considers that having regard to the several factors above there is an appropriate and strong justification for referencing 'heritage' in the draft Plan objectives.

What is Part B

Part B of the draft Plan (the Box Parish Character and Design Statement and Code) complements Part A. Its role is inform relevant planning policies in Part A.

Part B will identify and clearly set out what features make up the 'character' of the Parish and provide the foundations to enable clear and positive guidance for third parties such as home-owners and businesses to be prepared. This will allow them to be confident about bringing about change(s) in a manner which will respect the current situation and setting and help to avoid uncertainty for them about what is likely to be appropriate.

Preparing design guidance and including it in the draft Plan will be 'good practice.' Its preparation as an integral part of the draft Plan is not to address 'a problem'.

The National Planning Policy Framework is very clear about the role and importance of design guidance (Section 12 Achieving well designed places Paras.131-134). The role of neighbourhood planning groups in helping to identify the special qualities of each area is noted (Para. 132).

The Action Group may not be aware that several 'made' neighbourhood plans in Wiltshire have taken a similar approach to the Parish Council. They have prepared specific 'design' themed guidance documents to sit alongside their respective Neighbourhood Plan(s).

These include Bradford on Avon (2017), Bratton (2025), Calne Town and Calne Without (2025), Chippenham (2024), Colerne (2022), Corsham (2019),

		<p>Laverstoke and Ford (2022), Salisbury (2025), Sutton Benger (2025) and Westbury (2024).</p> <p>Wiltshire Council prepared and adopted a design guide to sit alongside its Local Plan in Spring 2024.</p> <p>The guidance in Part B of the draft Plan has been prepared to respond to the advice set out in Appendix A neighbourhood Planning of that guide.</p> <p>The preparation of Part B has encompassed understanding both the natural environment and built form and how the Parish has developed as a place where people have lived and worked. An integral part of this is recognising the presence of features in the natural and built environments and the wider landscape of the Parish which speak to the rich and varied history of the Parish.</p> <p>The key outcome will be design guidance that is appropriate to the character of the Parish. It will sit alongside the design guidance from Wiltshire Council (see above).</p> <p>The preparation of Part B has been informed by a methodology and format used across the country by other communities involved in preparing local design guidance. The approach is one that has been validated by Historic England. The work has also been informed by Design in Neighbourhood Planning by Wiltshire Council (2023).</p> <p>A significant amount of primary research underpinned the assessment of character across the Parish to ensure that the work is soundly based and will pass external and independent scrutiny.</p> <p>It has comprised 'desk-top' studies on a Parish-wide basis followed by assessments 'in the field' across all of the Parish to record the features in areas with broadly similar characteristics in terms of built form and development.</p>
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		<p>The Box Parish Neighbourhood Plan Face Book 'platform' was used to invite community support for the preparation of the character assessment work in October 2021 and October 2022 with further updates in February and October 2023.</p> <p>The work itself has been done by Steering Group members, other volunteer residents and a planning consultant who was supporting the task. It was done in an open and transparent manner by individuals with a relevant and varied set of skills. Work to support and inform the Corsham Neighbourhood Plan (2019) followed a similar approach and will be typical of other similar initiatives.</p> <p>When finalised, the character assessments and guidance in Part B will complement planning policies in Part A of the draft Plan. Part B will not include planning policies. Part B does not identify the proposed non-designated heritage assets.</p> <p>Progress is regularly reported to the wider Parish Council. It has been discussed at engagement events within the community from 2023.</p> <p>The draft Locally Valued Non-Designated Heritage Assets report</p> <p>Planning policies in the National Planning Policy Framework and the Wiltshire Core Strategy (2025) together with topic-specific guidance from Historic England (2021) give communities the opportunity to proactively identify and recognise the heritage significance of assets that are not statutorily listed through the preparation of their neighbourhood plans.</p> <p>The proposal that non-designated heritage assets are recognised in the draft Plan is not unusual. Several other 'made' neighbourhood plans in this part of Wiltshire include the identification of such features :</p>
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- Seend Neighbourhood Plan (2021)
- Chippenham (2024)
- Calne Community (2025)
- Joint Melksham Neighbourhood Plan 2 (2025)

Each of these plans has been through the full statutory process required for neighbourhood plans (including independent examination) and are now 'made.' This confirms that the plans as a whole, and in regard to the identification of such assets, have been found to meet 'basic conditions'. The preparation of these plans has necessarily required engagement with Wiltshire Council – specifically, the officers dealing with neighbourhood planning but also others such as heritage staff.

National Planning Guidance defines non-designated heritage assets as 'locally-identified buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets'.

Para. 6.135 of the Wiltshire Core Strategy (2015) says these include heritage assets such as buildings and archaeological sites of regional and local interest within the wider remit of heritage assets that should be protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life.

These are included in Core Strategy Policy CP58 which says :

'Distinctive elements of Wiltshire's historic environment, including **non-designated heritage assets**, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and

		<p>environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping)'. Historic England's guidance is set out in Local Heritage Listing : Identifying and conserving local heritage (2021). It says :</p> <p>'The preparation of local heritage lists is a way for communities, neighbourhood plan-making bodies and local planning authorities to identify and celebrate the historic buildings, places and spaces, archaeological sites and historic parks, gardens and other designed landscapes which enrich and enliven their area'. (Section 1, Para. 2). (The Action Group will note the reference by Historic England to 'celebrate').</p> <p>The guidance highlights the importance of understanding the planning context. It notes that the NPPF says in para. 185 that plans should set out 'a positive strategy for the conservation and enjoyment of the historic environment' (Section 1, Para. 6). Emphasis is placed on 'sustaining and enhancing the significance of heritage assets' and recognising that heritage assets are an 'irreplaceable resource' which should be conserved 'in a manner appropriate to their significance' (Section 1, Para. 6). It also says that it is good practice for a Local Plan (and / or Neighbourhood Plan) to have a policy that sets out how proposals affecting the non-designated heritage assets on the list will be considered (Section 1, Para. 13).</p> <p>The guidance also notes the legitimacy and weight of local lists is increased when they are prepared in accordance with defined criteria and subject to public engagement and consultation (Section 1, Para. 17).</p> <p>It also says 'Work in preparing a Neighbourhood Plan may thus usefully include the development of a policy which sets out how proposals affecting non-designated heritage assets on a list will be considered, and consideration of which</p>
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	<p>buildings and sites might merit inclusion on a local heritage list' (Section 1, Para. 23).</p> <p>Wiltshire Council will have an opportunity to comment on the draft list of proposed non-designated heritage items. Wiltshire Council do not have to agree the draft list but the Parish Council recognises that it will be an important stakeholder in the process of finalising the list. The Parish Council will work closely with the authority's heritage advisers on this. Identifying proposed non-designated heritage assets has to be taken against the backdrop and context of the wider Parish. As mentioned earlier, a large number of heritage assets in the Parish are already recognised through statutory measures such as listing and Conservation Areas.</p> <p>Section 3 of the draft Locally Valued Non-designated heritage assets report provides a comprehensive picture of the picture linked to statutory recognition. In summary, it records that the Parish includes :</p> <ul style="list-style-type: none">• four scheduled monuments• two hundred and forty listed buildings (including four Grade 1 and nine Grade 2* and the remainder all Grade 2)• four conservation areas (in Ashley, Box, Ditteridge and Middlehill) <p>The concentration of such a large number of recognised and identified heritage features across the Parish speaks strongly to its important and rich history. It is wholly consistent with planning policy and guidance that this should be recognised in the draft Plan and be complemented with appropriate locally identified non-designated heritage features. As mentioned earlier, the Parish Council considers that the presence of such an extensive range of statutorily recognised features strongly supports and justifies the specific reference to 'heritage' in Objective B.</p> <p>Section 4 of the draft report explains how each of the assets identified was assessed against the relevant Historic England criteria.</p>
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		<p>Section 5 of the draft report explains how it has been prepared.</p> <p>The proposed list of assets was prepared by the Steering Group with assistance from local residents with an interest in local history. Some have significant professional experience and long-standing involvement in heritage matters.</p> <p>An element of community outreach supported and informed the early work :</p> <ul style="list-style-type: none">• posters placed in locations across the Parish asked the community to put forward suggestions• the Box Parish Neighbourhood Plan Face Book 'platform' was used in October 2022 to invite suggestions from the community for nominations to be included on the draft proposed non-designated heritage assets list. It included a link to the 'Box People and Places' website (www.boxpeopleandplaces.com) which included a comprehensive item about this work and the background to it and reasons for it. <p>No comments were made questioning this initiative.</p> <p>The comprehensive Appendix to the draft report clearly explains how each of the individual identified assets proposed to be recognised as a non-designated heritage asset meets these requirements.</p> <p>Overall, the draft proposed list includes 60 individual heritage-related assets and two wider Areas of Local Heritage Importance (at Wadswick and Chapel Plaister and Box Hill) which provide the setting for these. These are each described in a single table in Section 6.</p>
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		<p>The Action Group consider that the proposed designations 'has been selective' and 'the wider heritage value of surrounding areas is not similarly recognised'. It says that the draft report overlooks heritage features in other parts of the Parish and this results in an uneven and inconsistent spread of proposed non-designated assets.</p> <p>It is a fundamental tenet of our planning system for plans and their policies to identify and provide safeguards to features of significance including features linked to nature conservation and heritage.</p> <p>It is obviously the case that features that justify identification and safeguarding because they meet the necessary criteria (such as Sites of Special Scientific Interest, Conservation Areas and Listed Buildings) can only be recognised in the locations <i>where they are situated</i>. The same principle applies to features proposed to be identified as local non-designated heritage assets.</p> <p>The Action Group comment also overlooks that the considerable heritage significance of other parts of the Parish (individual heritage features or 'groupings' of these) is already recognised by other statutory measures and is clearly identified in the draft Plan. It would not be appropriate for these to be identified in the report dealing with proposed non-designated heritage assets because they are already designated under statutory procedures.</p> <p>The Parish Council can confirm that the proposed list of non-designated assets :</p> <ul style="list-style-type: none">• has not excluded any areas of the Parish; and• is not focussed in any particular areas of the Parish <p>The criteria were not applied selectively so as to 'skew' the distribution assets so that some parts of the Parish would have more and some have less. Each of the assets that are proposed to be included is included because of their <i>local</i> heritage</p>
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		<p>significance and irrespective of their location in the Parish (and because they meet the Historic England criteria).</p> <p>The response to item no. 3 (below) identifies that features proposed to be identified can be linked to particular topics ('themes'). It shows that they occur in different locations across the whole Parish and has not been done selectively.</p> <p>Preparing a list of non-designated heritage assets responds positively to both the opportunity and the expectation in national planning policy and guidance. The Parish Council will, of course, welcome community support for this. It points out, however, that an explicit community mandate for this work to be done is not necessary and, conversely, the reverse holds that adverse comments in the community should not preclude the work being undertaken if it is done in accordance with the guidance.</p> <p>The identification of non-designated local heritage assets is not to address 'a problem' and does not require possible threats to such assets to be evidenced. In most cases, other than a generic threat of harm being caused to a potential asset by inappropriate and / or insensitive changes such threats cannot be readily identified or assessed.</p> <p>The outcome is that the Parish Council is confident that :</p> <ul style="list-style-type: none">• it gave appropriate publicity to the task and the opportunity for comment from the community• there is a robust and valid rationale for every item on the list in accordance with the relevant Government and Historic England guidance; and• the preparation of the list has been done 'properly' and in line with policy, guidance and 'good practice'
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Importantly, the Parish Council has an expectation that this part of the draft Plan work will pass external independent scrutiny later in the plan preparation programme.

How other planning designations ‘fit’

Most of Box Parish is within the Green Belt and the Cotswold National Landscape.

The Action Group suggests that these provide adequate safeguards for these features and that the community has not identified concerns about these.

Green Belt policy (as set out in Section 13 of the National Planning Policy Framework) is a strategic level planning tool with five very specific and long-standing functions. One of these is ‘d) to preserve the setting and special character of historic towns’ but national Green Belt policy does not include any provision for dealing with or providing safeguards to heritage issues at a local level.

Although most of the Parish is situated within the Cotswold National Landscape this designation does not, in isolation, provide adequate safeguards for proposed non-designated heritage assets (nor other important features in the natural and built environment).

It would also be inappropriate to rely on any ‘protection’ afforded to these assets simply because they are located in such areas (Green Belt and National Landscape) as this protection would be lost if the boundaries of the designations changed and excluded the assets.

The Cotswold National Landscape Board has a statutory duty to prepare a management plan and to review this at intervals of no more than five years. The Cotswold National Landscape Management Plan (2025-2030) was adopted in early 2025. Importantly, the Plan is very clear that its delivery is dependent on a

		<p>number of other stakeholders (including <i>Parish Councils</i>) as well as the Board itself. Its policies are intended to guide the work of all the parties within the National Landscape area and to help to deliver its Vision and outcomes.</p> <p>The Management Plan notes (page 66) that planning policy and legislation afford the highest levels of protection to National Landscapes. The Parish Council considers that this supports the approach followed in its draft Plan.</p> <p>Outcome 7 of the Management Plan focusses on the historic environment and cultural heritage by seeking to ensure that the historic environment and cultural heritage of the Cotswold National Landscape is better understood, conserved and enhanced. Outcome 4 is focussed on Local distinctiveness and seeks to ensure that the distinctiveness of the Cotswold National Landscape is valued, conserved and enhanced.</p> <p>The Management Plan has a specific aim of Conserving and enhancing natural beauty. A policy requires that proposals that have the potential to impact on the historic environment and cultural heritage of the National Landscape should be delivered in a way that is compatible with and seeks to further the conservation and enhancement of these heritage assets and their setting (Policy CE7.1). Further policies promote the preparation of design guidance (supported by a robust evidence base) and recognise the potential importance of non-designated assets and says they should be protected in line with national policy and guidance (Policies CE73.3 and CE7.4).</p> <p>The Parish Council strongly considers that the approach being taken in the draft Plan both generally and in regard to the preparation of design guidance and the identification of non-designated heritage assets is wholly consistent with the responsibilities and expectations placed upon it that are outlined in the Management Plan and summarised above.</p>

<p>2</p>	<p>Evidence-based and methodology</p> <p>The evidence underpinning Part B appears weak, speculative, and heavily reliant on secondary sources rather than primary historical records. Several assertions presented at the engagement meeting did not withstand scrutiny when questioned. This raises concerns about the robustness, objectivity, and academic standard of the research used to support proposals that may materially affect homeowners' rights. The quarry under discussion has undergone significant changes of use over 170 years, including a recent landfill sanctioned by the Parish and County Councils. Therefore, the assertion that this quarry has SIGNIFICANT heritage value seems overstated.</p>	<p>The Action Group comments in this item initially mention Part B of the draft Plan. Subsequently, most of the Action Group comment is concerned with its concerns about the factual background for a specific quarry.</p> <p>Other parts of the Parish Council comments respond comprehensively to how Part B is being prepared (see the response to item no. 1, above).</p> <p>Third parties will have an opportunity to review Part B and comment upon it (and the rest of the draft Plan) when it is published as part of the Regulation 14 stage engagement. Until then, because the Action Group has not seen Part B, its commentary that it (or any other part of the draft Plan) is 'weak, speculative, and heavily reliant on secondary sources rather than primary historical records' is both untimely and invalid and ignores the considerable and relevant professional expertise and commitment of those who are involved in it.</p> <p>The Parish Council is taking every step to ensure that the draft Plan has a robust evidence base across all topics. This includes researching and understanding the historical importance of all features across the Parish. This has been the case irrespective of whether they are then to be proposed to be identified as non-designated heritage assets.</p> <p>The Steering Group has taken a great deal of care to ensure that the draft Plan has been informed by, and corroborated by, several reputable, well-informed and independent sources as well as the specialist professional expertise and experience of its members.</p> <p>These included :</p> <p>http://www.boxpeopleandplaces.co.uk/box-hill-heritage-area.html</p>
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		<p>In regard to Tynings Quarry, the Action Group should also note that the heritage significance of this setting was referred to when Wiltshire Council was dealing with a planning application for a proposal to extend no. 5, The Tynings in 2024.</p> <p>The Officer report highlighted that Wiltshire Council planning policy (specifically, Policy CP 58 Ensuring the conservation of the historic environment) recognises the importance of non-designated heritage assets and says that where they contribute to local character and identity they should be conserved and where possible enhanced.</p> <p>It also noted that Historic England guidance enables the identification of non-designated heritage assets through the planning application process where the appropriate criteria are satisfied. The Officer report noted that the application property is in a terrace which is ‘a good example of a quarry workers dwellings’. It also noted that ‘the historic character of the terrace is still apparent, and its conservation should be encouraged’. It concluded that given the age and distinct character of the terrace the site is part of a non-designated heritage asset which has a degree of heritage significance. The important point here is that a third party (Wiltshire Council) was itself having regard to and recognising the heritage significance of this asset ahead of, and independently of, the work on the draft Plan.</p> <p>The application was refused as contrary to policies in the National Planning Policy Framework, Wiltshire Core Strategy and guidance in the strategy for the Area of Outstanding Natural Beauty as well as guidance in the Wiltshire Design Guide. A subsequent appeal was dismissed with the Inspector noting ‘that the terrace in which the appeal property is situated is not formally registered as a non-designated heritage. Nevertheless, its historic and picturesque appearance makes a direct contribution to the quality of the local street scene. Despite various alterations and extensions, the terrace maintains a relatively consistent appearance along its frontage.’</p>
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		<p>The Action Group does not make clear which site it is referring to in the comments regarding 'landfill' but the Parish Council has no record of it sanctioning any landfill proposals in the Parish.</p>
<p>3</p>	<p>Inconsistency and proportionality</p> <p>Examples were presented of quarrying and mining sites of similar or greater acknowledged historic significance that have not been subject to similar designation. This inconsistency calls into question the proportionality and fairness of the approach being taken within the Parish and whether sites are being assessed against clear, objective, and consistently applied criteria.</p>	<p>It is not correct that other features linked to quarrying and mining in other locations are not afforded protection.</p> <p>Where such features have existed and they are of greater historic significance then they have been recognised. Sometimes this has been with greater levels of protection than is the case with features identified on a <i>local</i> heritage list.</p> <p>In other parts of the country, former mining and quarrying areas have been recognised with very significant levels of protection reflecting their historic importance.</p> <p>Large parts of the area included in the St Just in Penwith Neighbourhood Plan are within the Cornish and West Devon Mining Landscapes World Heritage Site. That Neighbourhood Plan seeks to support and reinforce the aims of the Management Plan for this.</p> <p>Locally, features linked to quarrying around Bath including quarries, dwellings and supporting infrastructure such as tramways and rail lines at Claverton Down, Widcombe and Bathford are identified on the BANES historic environment record and may be included on the relevant local list when it is prepared if they meet the relevant criteria.</p> <p>Several quarrying themed initiatives recognise the significance of stone quarrying and its impact on the landscape and communities including the Combe Down</p>

		<p>Heritage Trail, Stone Mines on Combe Down and the Bath Stone Museum at Combe Down. A public art installation at Pickwick, Corsham recognises the importance of quarrying in the heritage of our neighbouring area and will provide information about the long history of the activity there.</p> <p>Non-designated heritage features linked to former iron ore working (including houses, walling and structures linked to the nearby canal) are identified at Seend, Wiltshire and referred to in that neighbourhood plan.</p> <p>The Action Group comment on the 'proportionality and fairness' of the approach taken. It suggests that the sites proposed to be identified were 'not assessed against clear, objective and consistently applied criteria'.</p> <p>Section 4 of the draft report (and the response to item no. 1, above) explain clearly that each proposed asset has been assessed objectively and fairly against the conservation principles and criteria in the Historic England guidance.</p> <p>Each of the features proposed to be identified as a non-designated heritage asset is set out in the Appendix in the draft report. There is a comprehensive description of the specific asset for each feature. The supporting narrative for each feature clearly identifies its heritage significance generally and specifically in regard to Box Parish.</p> <p>The Action Group comments on 'proportionality and fairness' suggests that the identification of features has been done unevenly across the Parish.</p> <p>This comment fails to recognise that each feature has been assessed on its merits and also that it is fundamental that features can only be identified where they are situated. The latter inevitably affects the overall distribution of features across an area.</p>
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		<p>Section 7 of the draft report identifies some key themes underpinning the proposed assets. It shows that where individual features are proposed to be identified there may also be similar features in other parts of the Parish.</p> <p>This part of the report highlights that features may be grouped together in regard to :</p> <ul style="list-style-type: none">• Quarrying industry comprising surface and underground quarries, workers' housing and other quarrying infrastructure• Transport and communication comprising particularly railway infrastructure• Watercourse features comprising mills and associated waterworks, watermeadows• Military archaeology comprising pillboxes, underground facilities, sites of temporary workers' accommodation <p>The tables in Section 7 of the draft report confirm how features are spread across the Parish rather than concentrated in single parts of it.</p> <p>The only 'theme' where there is not a wider distribution across the Parish is 'Watercourse features'. This is because these are obviously focussed on the Bybrook which obviously occupies a very particular part of the Parish</p> <p>The Action Group will see that the draft report is clear that in regard to quarrying, the features proposed to be identified are not just in Box Hill but also in Box, Boxfields, Kingsdown and Quarry Hill.</p>
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		<p>It is, therefore, quite inappropriate for it to be suggested that the draft list focusses on some areas and not others.</p> <p>The Action Group comments about ‘proportionality’ are inappropriate when features can only be identified in their specific location and irrespective of what may be identified elsewhere.</p> <p>The purpose of preparing assets to be identified on a local list is to recognise features of heritage significance in that <i>local</i> area. It is, therefore, immaterial that similar features may have been identified by another local authority (or Parish Council) in that area. There is no requirement in national policy and guidance that features proposed to be included on a local list are assessed against other similar features in other adjoining areas or areas further afield. This would be inconsistent with the intention to acknowledge their <i>local</i> significance.</p> <p>The absence of a local list with similar features elsewhere may simply be because this work has not yet been done in that area. When / if that work takes place it may well identify similar features as being significant in <i>that</i> area. It will be perfectly logical for it to do so irrespective of what has happened elsewhere (subject to the Historic England criteria being satisfied).</p> <p>No consideration is required of the ‘right’ number of proposed assets since each is considered entirely on its merits against the same criteria. This is consistent with the approach to statutory listing where several individual buildings may be listed across an area on the basis of their individual (and group) historic significance.</p>
4	<p>Transparency and publication of Part B</p> <p>Part B has not been made publicly</p>	<p>The role of and progress with regard to Part B is set out extensively above (in the responses to items nos. 1, 2 and 3 above). It was also explained at the meeting.</p>

	<p>available despite the Neighbourhood Plan's aims and objectives having already been adopted by the Council. If Part B has informed Strategic Environmental Assessment (SEA) screening or other assessments by Wiltshire Council, its absence from public scrutiny is concerning. If it has not, this raises questions about whether those assessments are complete or sufficiently informed.</p>	<p>In regard to the remainder of the comments in this item, it is typical for most plan-making activities to include the approval of a Vision and Objectives following early evidence identification and building work, careful regard to other relevant planning policies and the outcomes from earlier engagement with third parties.</p> <p>It enables the subsequent substantive work in preparing a draft Plan to take place (including the subsequent development of planning policies and guidance) in a manner that is focussed and effective.</p> <p>Far from being unusual, the Parish Council's approach with the draft Plan has mirrored how plans are usually prepared. The approval of the Vision and Objectives for the draft Plan in 2023 has provided welcome certainty about the preparation of Parts A and B (and the necessary supporting evidence base documents) and is a tangible sign of progress for the wider community.</p> <p>The Parish Council pro-actively engages with the relevant specialist staff at Wiltshire Council on neighbourhood planning matters. The authority is aware of the proposed structure, format and components of the draft Plan.</p> <p>Wiltshire Council:</p> <ul style="list-style-type: none">• was provided with a 'working draft' of Part A following approval by the Parish Council in Spring 2025 (and prior to this had been generally appraised of how the Plan was being prepared)• is aware of how Part B fits into the overall draft Plan and what its role is• is aware of what stage has been reached on Part B and has not raised any issues with this nor that it has not been published for third parties.• is aware of the intention for the draft Plan to identify locally valued non designated heritage assets <p>Wiltshire Council reviewed Part A of the draft Plan for the purposes of a technical screening assessment against the relevant Regulations. Part B was not provided</p>
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		<p>for the technical screening assessment (for the reasons already outlined) and Wiltshire Council did not comment about this.</p> <p>The technical screening assessment outcome did not highlight any issues about how the Plan was being prepared nor the respective roles of Parts A and B and the emerging supporting evidence documents.</p> <p>Furthermore, Wiltshire Council provided a draft of its screening opinion to the appropriate consultation bodies. This included Historic England and they did not raise any issues or concerns.</p> <p>The Wiltshire Council technical screening assessment response highlighted that the primary focus of such a screening is to identify if a draft Plan will have significant <i>environmental</i> effects (and to require a Strategic Environmental Assessment to be prepared if it will). Part B of the Plan did not have a role in the technical screening assessment as it was not required nor available.</p> <p>A Strategic Environmental Assessment (SEA) is necessary because of the potential implications for the Bath and Bradford on Avon Bats Special Area of Conservation.</p> <p>Throughout the project, the position with all this work has been on the relevant pages of the Parish Council website as part of the general updates on the progress with the draft Plan. The Planning Committee meeting on October 30 2025 included a specific update in regard to the Wiltshire Council SEA requirement.</p> <p>The Scoping report for the SEA is now the subject of consultation with 'appropriate bodies.' As required in the legislation, this will include Natural England, the Environment Agency and Historic England. No 'external' consultation on this is required.</p>
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		<p>Part B of the Plan (and other supporting items) will be available for external scrutiny when the draft Plan is subject to Regulation 14 stage consultation.</p>
<p>5</p>	<p>Process, governance, and conflicts of interest</p> <p>There were difficulties at the engagement meeting in clearly identifying the authorship of Part B and the full membership of the Steering Committee. This lack of transparency, combined with apparent overlapping interests between contributors to the Neighbourhood Plan and the Parish Council members' ability to vote on this (27 Mar 2025), prompts concerns about both governance arrangements and potential conflicts of interest. There is also an emerging concern that Parish Council members are applying the NP to planning assessments <i>prior</i> to the public referendum (the NP was voted through by BPC, and then it was voted to apply the draft plan going forward against future Planning assessments, 27 Mar 2025).</p>	<p>The Parish Council has been clear about how work on the draft Plan is taking place.</p> <p>There is no uncertainty or ambiguity about how Part B of the draft Plan is being prepared and who is responsible for this.</p> <p>The identification of a 'Steering Group' to manage the work on a neighbourhood plan is common amongst the plans that have been 'made' in Wiltshire.</p> <p>The Parish Council website clearly identifies who is currently involved with the Steering Group and this was addressed at the meeting.</p> <p>The following confirms the position.</p> <p>The Steering Group membership is published on the PC website: https://www.boxparishcouncil.gov.uk/our-community/neighbourhood-plan</p> <p>The Steering Group has three Parish Councillors : Tim Walton, Sandra Roche and Nigel Ingledew.</p> <p>The three Parish Councillors currently involved in the Steering Group are involved because they wish to support and inform the preparation of the draft Plan for the Parish. This is entirely separate to and completely independent of any other roles they have with the Parish Council.</p>

		<p>Three volunteer residents (from Box and Rudloe) are currently involved : Kevin Lawrence, Jonathan Parkhouse and Martyn Thomas.</p> <p>Steve Vickery (the Clerk to the Parish Council) also assists the Steering Group.</p> <p>The Steering Group members in attendance at the engagement event were introduced so the Action Group know who is involved.</p> <p>A number of other individuals (both Councillors and volunteer residents) have been involved in earlier work on the draft Plan. External assistance was provided from two specialist consultancies (until the end of 2023/2024).</p> <p>The Steering Group has always been transparent and open about its wish for further individuals to support and inform the work on the draft Plan as this will supplement the experience and skills available to the team. Further resources for specific topic or time-based tasks or to support the rest of the work through to the draft Plan being completed will be welcomed.</p> <p>The following comments are in regard to the Action Group's remarks about 'governance'.</p> <p>Oversight and approval of the work of the Steering Group is provided by the Parish Council Planning Committee.</p> <p>Progress on the preparation of the draft Plan (including Part B) is regularly reported to the Planning Committee and the wider Parish Council.</p> <p>The Planning Committee includes Councillors (Councillors Davies, Duncan, Haslett and Leach) who are not involved in the preparation of the draft Plan through the Steering Group. This provides a 'majority' on the Planning Committee as far as decisions are concerned. It is a robust mechanism to ensure that matters linked to the draft Plan are properly debated and considered before approval.</p>
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		<p>Subsequently, matters linked to the draft Plan are considered by all Councillors at Full Council before being approved. Full Council includes four Councillors who are neither involved with the Steering Group nor involved with Planning Committee (Councillors Ian Johnston, Hazel Parker, Marilyn Tye and Bron Walton).</p> <p>The Parish Council is satisfied that this arrangement provides the project with the necessary and appropriate ‘checks and balances’ and that there are no conflicts of interest.</p> <p>In regard to planning decisions, Planning Committee Members are always aware that the Government’s National Planning Policy Framework (2024) and the Wiltshire Core Strategy (2015) will continue to form the primary context for all decisions on planning matters until the draft Plan has been through the full preparation procedure. They are also mindful in doing so that the draft Plan is being prepared to be in accord with both the strategies referred to. Nonetheless, as part of their development management role it is helpful and informative for Councillors to reflect on how the draft Plan addresses relevant matters in the course of coming to their conclusions.</p> <p>The status of the draft Neighbourhood Plan has been communicated to, and is understood by the Planning Committee and the wider Parish Council. Nevertheless, and for the avoidance of doubt, the Steering Group has reminded the Planning Committee and the Parish Council that the draft Neighbourhood Plan should not be cited as a reference document until it has been formally approved following completion of the established legislative requirements and processes.</p>
6	<p>Engagement and consultation</p> <p>Community awareness of the Neighbourhood Plan and the implications of Part B remains low.</p>	<p>The Parish Council has provided updates on the preparation of the draft Neighbourhood Plan <i>as a whole</i> through its Planning and Council meetings and provides regular updates on its social media pages.</p>

	<p>Engagement to date appears limited, including surveys with very small sample sizes whose results have not been clearly publicised. It became clear at the engagement meeting that affected homeowners have not been meaningfully consulted prior to proposals that may place additional planning constraints on their properties.</p>	<p>The Parish Council has a specific Face Book platform for the draft Plan. It has used this to provide information about the project at key stages and on particular topics and to engage with the community (including seeking input to support and inform the work). The responses (above and following) include several examples of this.</p> <p>It will continue this approach as the draft Plan progresses through formal engagement and consultation to ensure there is appropriate awareness of it and the opportunity for the community to comment.</p> <p>The Parish Council is represented at the annual Box 'Revels' community event which is well supported and attended by many in the community as well as visitors from outside the Parish. It provides a valuable opportunity each year to highlight the preparation of the draft Plan and to seek views on the work so far and to address any concerns raised by the community.</p> <p>The Annual Parish meeting has also been used as an opportunity to promote the draft Plan and to engage with the community on it. The meetings have been publicised on the Box Plan Face Book 'platform'.</p> <p>The Parish Council held specific engagement events in Box and Rudloe in 2023 about the draft Plan to seek endorsement of 'the direction of travel' for the emerging Plan including the draft objectives. These were publicised on the Box Plan Face Book 'platform'.</p> <p>Local County Councillors and MPs have been updated on the preparation of the draft Plan.</p> <p>The Parish Council considers that the awareness in the community about the draft Plan is satisfactory having regard to the relatively early stage in the overall programme that has been reached.</p>
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7	<p>Planning impact and cumulative constraints</p> <p>The likely planning implications of Non-Designated Heritage Asset status were underplayed during the engagement meeting. In an area already subject to Green Belt, National Landscape, and other statutory constraints, the introduction of additional layers of restriction is a significant concern for residents and may materially affect their ability to maintain, adapt, or improve their homes. Without a clearly identified need for additional restrictions, the NP falls foul of clear government guidance.</p>	<p>The planning implications of non-designated Heritage Asset status were not underplayed at the meeting as there was not an opportunity for them to be fully discussed.</p> <p>As well as features which are already statutorily recognised, there are many features which contribute to local character and the history of the Parish.</p> <p>In appropriate cases, the draft Plan is proposing to identify these as non-designated heritage assets.</p> <p>Identifying such assets on a local heritage list can benefit the Parish by helping :</p> <ul style="list-style-type: none"> • owners and their advisers better understand the local context in which their asset is located

- to recognise assets which contribute to a sense of place, have local distinctiveness and have local significance
- the community to better understand the history of its area

The planning protections for non-designated heritage assets are not as strong as those for designated assets but they are still important.

The identification of a feature as a non-designated heritage asset does not prevent change and it does not preclude appropriate development taking place where such a feature has been identified.

When a proposal is prepared for a feature which is identified as a non-designated heritage asset it will **not** require the preparation of a separate application for listed building consent.

An owner of a building which is statutorily listed does not have planning 'permitted development' rights. Planning 'permitted development' rights are not affected by a feature being identified as a non-designated heritage asset unless the relevant authority has taken steps to remove these by means of a special measure called an Article 4 Direction. In the event of an Article 4 Direction being proposed then an authority would provide an opportunity for engagement and consultation on this.

Identification on a local heritage list is not in itself a 'planning restriction' as it simply indicates that the feature has some heritage value which should be considered when preparing a proposal and, subsequently, in the determination of a planning application. It will require an owner to ensure that any proposals show how the heritage significance of the asset has been taken into account. Owners will be expected to ensure they prepare a proposal which respects the character

		<p>and significance of the asset and the proposals should show a good understanding of how and why the asset is significant.</p> <p>When a decision is taken on a planning application involving a feature identified as a non-designated heritage asset the identified feature must be considered as a 'material consideration'. This means it must be taken into account with any other 'material consideration' in any planning decision. The Historic England guidance says that 'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset' (Section 1, Para. 8).</p> <p>The guidance is also helpful on the matter of how much <i>weight</i> should be afforded to a feature being identified as a non-designated heritage asset. It says that planning applications can be refused on the grounds of the harm they would cause to a non-designated heritage asset (Section 1, Para.15).</p> <p>The Action Group refers to 'other statutory constraints'.</p> <p>The Government would regard the National Planning Policy Framework (NPPF) as the means to sustainable development being secured for the good of the community. Whilst it is undertaking revisions to the NPPF, it would not characterise this important policy framework as a 'constraint'.</p> <p>Many residents welcome that planning policies such as the Green Belt and National Landscape designation provide both welcome recognition of the quality of their surroundings as well as safeguards that may help to ensure that where they enjoy living is not spoilt by inappropriate development.</p> <p>Residents who have purchased a property in areas within these designations will usually have been appraised of the wider planning context in place across the</p>
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		<p>Parish before they committed to living here. Many will have made specific choices based on those measures remaining in place and being strongly supported.</p> <p>The legislation underlying National Landscapes designation is there to recognise that such areas warrant a very high level of protection. It places certain unavoidable responsibilities and obligations on Parish Councils in regard to helping to deliver the Cotswold National Landscape Management Plan. The Management Plan explains that this is to be delivered through the plans, strategies and other activities of parties in such areas. The preparation of the draft Plan is in line with this expectation.</p> <p>The draft Plan does not fall foul of Government guidance when both the current NPPF and Wiltshire Council Core Strategy policies robustly and transparently support the preparation of appropriate planning guidance and local lists for non-designated heritage assets.</p> <p>Several 'made' neighbourhood plans or plans in preparation have taken the opportunity to do this including some in this part of Wiltshire (see the response to item no. 1, above).</p> <p>The Action Group may be aware that the Government has recently published a draft revised National Planning Policy Framework (2025) and that Wiltshire Council is currently at the Examination stage with a draft Local Plan Review.</p> <p>In regard to the draft revised NPPF :</p> <ul style="list-style-type: none">• Section 13 : Protecting Green Belt land in the draft revised NPPF does not provide any further protection to non-designated assets than is in the extant NPPF.• Section 20 : Conserving and enhancing the historic environment does though provide more robust support for non-designated heritage assets.
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		<p>Local heritage assets are included in the headline objective as ‘an irreplaceable resource’.</p> <ul style="list-style-type: none">• Policy HE1: Planning for the historic environment highlights the role of ‘a local list to identify non-designated heritage assets that are important to the local community’. <p>In regard to the draft Wiltshire Council Local Plan Review :</p> <ul style="list-style-type: none">• Para. 5.243 says that opportunities to enhance the content of the Historic Environment Record will be encouraged and supported.• Para. 5.245 says that ‘Local communities, including through neighbourhood planning are also encouraged to develop their own design assessments, guidance and locally specific heritage policy using appropriate expertise.’• Policy 99 : Ensuring the conservation and enhancement of the historic environment says that ‘.....Distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.....’ <p>The Parish Council considers the draft Plan work is entirely consistent with these comments.</p> <p>A proposal for the installation of items such as solar panels on a feature identified as a non-designated asset would not be precluded. It would have to show how the scheme would take account of the heritage significance of the property as well as meeting other relevant planning policies. It would have to meet the latter regardless of whether the property was identified as a non-designated heritage asset.</p>
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8	<p>External stakeholders, safety, and statutory assessment</p> <p>Given known sensitivities around former mining and quarrying areas, it remains unclear whether relevant external stakeholders, such as the MOD, Police or Fire Service, have been consulted regarding increased interest in, or formal designation of, these sites.</p> <p>The absence of such engagement would be of particular concern in the context of any County Council analysis of the draft Neighbourhood Plan, especially where this information may be relevant to validating Strategic Environmental Assessment (SEA) requirements. A lack of evidence demonstrating appropriate consultation with statutory and non-statutory stakeholders could call into question the completeness and robustness of the assessment process.</p>	<p>The Parish Council fully understands its obligations and responsibilities in regard to engagement and consultation.</p> <p>Other responses (above) make very clear that no <i>formal</i> consultation and engagement has been required to take place on the draft Plan so far (and none has been done).</p> <p>The Box Plan Face Book 'platform' has been used to publicise specific work such as evidence building activities, the character assessment surveys and the identification of proposed non-designated heritage assets and to invite the community to support these and other tasks.</p> <p>All the engagement so far has been <i>informal</i> and has been to assist the Steering Group in preparing the draft Plan (including evidence building and seeking views on the 'direction of travel'). This is in line with normal practice for plan preparation.</p> <p>The engagement underway with the community on proposed non-designated heritage assets and the Areas of Local Heritage Importance is in line with Historic England's guidance (Section 2, Para. 23).</p> <p>Consultation at Regulation 14 stage of preparing a neighbourhood plan must encompass those third parties who are required by legislation to be given an opportunity to review and comment on the draft Plan. It must last for a minimum of 6 weeks. The Parish Council will adhere to these requirements.</p> <p>That consultation will also encompass the community and other third parties having a further opportunity to review the draft Plan and to comment. This</p>

		<p>consultation will include owners of proposed non-designated heritage assets having a further opportunity to comment.</p> <p>Wiltshire Council will have the opportunity to review this consultation and its outcome(s) when the draft Plan is formally submitted. A formal Consultation Statement will be prepared to document the consultation and engagement that has been undertaken and this will be reviewed as part of the plan preparation process.</p> <p>Parties who consider that there is no justification for their asset being identified as a proposed non-designated heritage asset will have a further opportunity to comment at this stage. These parties would need to identify reasons why the proposed listing is inappropriate.</p> <p>The current strategic environmental assessment work is being undertaken for the Parish Council by specialist consultants as this is specialist work that the Parish Council is not equipped to do. The consultants (AECOM) are aware of the draft Plan and its contents.</p> <p>This work must include formal consultation with 'appropriate' bodies (as set out in the relevant legislation) : Natural England, the Environment Agency and Historic England.</p> <p>Wiltshire Council will ensure that this engagement has been completed satisfactorily when it reviews the outcomes from the strategic environmental assessment work.</p>
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9	Value for money and prioritisation	
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	<p>Residents have expressed concern about whether the time, funding, and resources allocated to this work represent the best use of public money, particularly in the absence of clear objectives, demonstrable need, or broad community support.</p>	<p>Preparing a draft neighbourhood plan for Box Parish clearly accords with the opportunities set out in planning strategy set out at Government and Wiltshire Council level. It also accords with the expectations and responsibilities linked to the Parish being within the Cotswold National Landscape.</p> <p>Neighbourhood planning is recognised as providing an opportunity to change attitudes towards development through positive engagement by local communities and giving communities more control over the future of their area and local people having the chance to have their say on what happens where they live.</p> <p>Generally, within Wiltshire there is a high level of activity and interest around neighbourhood planning. Wiltshire Council promotes and supports communities becoming involved.</p> <p>The Wiltshire Council website shows the progress in preparing neighbourhood plans across the county. As at January 2026, according to the Wiltshire Council website, there are more than 60 'made' neighbourhood plans in place in Wiltshire.</p> <p>A neighbourhood plan for Box Parish will enable the Parish Council to set out a coherent statement of how the community wishes to see the Parish in the period ahead. Preparing a draft Plan enables the Council to identify issues that the community has indicated it wishes to see highlighted and addressed. It has welcome potential benefits in regard to securing funding from development.</p> <p>The emerging draft Plan has been unanimously supported across the Parish Council.</p> <p>The comments at the regular and one-off engagement events during the course of preparing the draft Box Parish Plan have indicated strong interest in this topic and robust support for the Parish Council undertaking this task.</p>
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		<p>The Parish Council was able to secure £17.9K grant funding from Locality for work by specialist consultants on the draft Plan from 2019/2020 until 2023/2024. The Government ended funding to Locality in Spring 2025 as part of its spending review. The Parish Council will continue to investigate any further opportunities for securing external funding including for work linked to the draft Plan.</p> <p>The Clerk to the Parish Council supports the work as necessary as part of their duties with the organisation.</p> <p>Work by Steering Group members (and ad hoc volunteers) is done on a voluntary basis at no cost to the Parish Council.</p> <p>The circa £6.5K cost of the consultants to prepare the SEA is being met from Parish Council funds.</p>
	<p>Conclusion and request</p> <p>We respectfully request that the Parish Council pause further progression of the Neighbourhood Plan until the issues outlined above are addressed. In particular, we ask for:</p> <ul style="list-style-type: none"> • Full publication of Part B and its supporting evidence • Clear explanation of objectives, necessity, and proportionality • Improved transparency around authorship, governance, and decision-making 	<p>As explained above, the Parish Council is committed to appropriate engagement with the community on the preparation and content of the draft Plan. It is also committed to the preparation of the draft Plan continuing on its current indicative programme.</p> <p>In response to the bullet points and as mentioned above :</p> <ul style="list-style-type: none"> • Part B is not yet ready for publication. The document will explain how the work was done and include individual templates for each of the individual Character Areas. • there has been a clear pathway for the adoption of the objectives for the draft Plan. These have been on the Council website since they were adopted in May 2023

- Meaningful consultation with affected homeowners and the wider community
- The results from 'The Tynings Quarry' consultation

We believe addressing these points will improve confidence in the Neighbourhood Plan process and help ensure it reflects the interests of the whole community.

- the Parish Council's response has set out clearly who is involved in the preparation of the draft Plan and how decisions linked to the draft Plan are taken
- the Parish Council has set up a specific 'platform' on Face Book linked to the draft Plan. The informal consultation and engagement to date has been appropriate and relevant to the stage in plan preparation that has been reached. The Parish Council's response(s) clearly set out what further consultation and engagement will take place. The Parish Council will follow the requirements for Regulation 14 stage consultation at the appropriate time
- the Parish Council will consider all the comments received linked to the proposed non-designated assets and the proposed Areas of Local Heritage Importance as part of its preparation of the draft Plan for Regulation 14

<p>Part Two</p> <p>This part of the document collates and summarises the comments from the Box Parish Neighbourhood Plan Action Group prior to the engagement event on January 5 2026</p>		
Item	Comment(s) from Action Group prior to January 5 2026	Box Parish Council response
1	<p>Clarification about (1) what stage the draft Plan is at and (2) its status with Box Parish Council. Clarification on the extent to which formal consultation has been done (Regulation 14 stage and beyond)</p>	<p>Extensive information on neighbourhood planning (including the position with individual plans) is available on the Wiltshire Council website.</p> <p>Planning and Conservation Committee and Full Council approved a draft Plan to go forward to Wiltshire Council for technical screening assessment (Spring 2025). It would have been inappropriate to publicise the draft Plan widely until the outcome of this was known. The Box Parish Neighbourhood Plan Face Book 'platform' includes updates on the preparation of the draft Plan.</p> <p>Regulation 14 consultation has not started (it would have been extensively publicised if it had). As a result there are no consultation responses yet.</p>

2	What position has the draft Plan reached with Wiltshire Council and what response(s) have been provided by that body?	<p>See response to Part One Q4 (above).</p> <p>Wiltshire Council has not provided any response(s) on the preparation of the draft Plan (and its component parts) other than the technical screening assessment outcome</p>
3	If comments been invited on the draft Plan what do they say?	<p>See response to Part Two Q2 (above).</p>
4	Specific key concerns (procedural, policy inconsistencies, negative impact of policies, lack of information and conflict with NPPF)	<p>Every care is being taken to ensure that the draft Plan is addressing all necessary procedural requirements (otherwise the project would be abortive). Wiltshire Council is aware of progress and has not raised any issues to date.</p> <p>Initial work was supported by a locally based specialist (and award winning) planning consultancy to assist with this.</p> <p>Aside from the Action Group comments, no comments have so far been received from the community to suggest that the 'direction of travel' for the draft Plan is not supported. From comments at engagement events since Covid the contrary is the position.</p> <p>In line with Government advice on preparing planning policies, the draft Plan generally seeks to (1) avoid repeating policy matters which are addressed in other strategies and (2) present policies in a positive manner.</p> <p>Preparation of the draft Plan is taking place against regular on-going review of higher level planning strategies (eg NPPF and the draft Wiltshire Local Plan Review) to ensure that it is 'a good fit' with these. A specific task in the form of a 'health-check / policy audit does this. Reference is made to this in an Appendix to</p>

		<p>the draft Plan. A copy of the health-check / policy audit has been provided to Wiltshire Council on an informal 'information' basis. The Steering Group is confident that the draft Plan is consistent with these strategies where necessary.</p> <p>In due course the draft Plan will be reviewed against the draft revised NPPF published at the end of 2025. It is expected that Wiltshire Council will review the draft Plan against relevant planning policies in the NPPF and its own draft Local Plan Review.</p> <p>The Parish Council considers that the suite of policies in the draft Plan properly reflects community aspirations and will be well suited to achieving the Vision and objectives in the draft Plan.</p> <p>No evidence has been provided to support the contention that there are policy inconsistencies.</p> <p>All fifteen policies in the draft Plan are supported by necessary and robust and up to date information that explains and justifies the policies. Some topics have specific supporting documents to provide this eg heritage, valued views, local green spaces and community facilities. Further evidence building work will be considered if necessary following Regulation 14 stage consultation.</p> <p>Notwithstanding that the draft Plan is not yet available for scrutiny or comment, the Action Group should clarify where it considers information is absent or where there are shortcomings.</p> <p>In the event that the draft Plan progresses to Regulation 14 stage consultation (and beyond) there will be extensive formal opportunities for it to be scrutinised by statutory bodies and third parties and for any shortcomings as suggested by the Action Group to be identified.</p>
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		Preparation of the draft Plan is 'benchmarked' against other neighbourhood plans (eg Colerne, Seend and Corsham) in regard to procedures and process and content.
5	Transparency of process (including publishing letters at Council meetings and on the PC website) and reflecting community priorities	<p>See response to Part 2, Q5 .</p> <p>The draft Plan is being prepared to reflect community priorities as identified through robust and frequent engagement / consultation events (eg Lemon Gazelle survey 2019), Box 'Revels', Parish Meetings, events in Rudloe and Box.</p> <p>Information about the draft Plan is available through attendance at Parish Council meetings and / or direct engagement with Parish Councillors / Steering Group representatives. Information about work on the draft Plan has been included on the Box Parish Neighbourhood Plan Face Book 'platform' since the projects started.</p> <p>Third parties (including residents) have been able to attend and participate in Steering Group meetings to seek information and / or clarification about the draft Plan</p>
6	Specific queries about the engagement with The Tynings	Update(s) will be provided by Parish Council following further consultation
7	Position with Part B of the draft Plan (including consultation stage)	See responses in Part 1, Q1,2,4,5 and 6.
8	Specific matters linked to the draft Plan:	

	<ul style="list-style-type: none"> • Adequacy of community engagement • Plan should address and reflect local priorities • Impact of planning designations • Inadequate regard to 'local' matters • Safeguarding community facilities • Proposed designations do not align with Historic England advice and requirements nor the NPPF • Proposed designations will add further bureaucracy • More shop facilities • EV facilities • Parking provision • Local museum 	<p>Initial work on the draft Plan was informed and guided by support from a specialist planning consultancy with extensive track-record of involvement in this type of work and this included advising on how and when engagement should take place.</p> <p>The engagement with the community has been appropriate in regard to the position the draft Plan has reached and to ensure that it takes account of and reflects local priorities.</p> <p>The source material in some instances was the Box Communities Plan 2013-2020 and this provided useful information about community priorities.</p> <p>'Local matters' are explored extensively in the draft Plan across several topics. The draft Plan seeks to protect and safeguard facilities and features which are known to be important to the community eg views, open spaces, nature conservation, heritage and features and facilities used and enjoyed by the community.</p> <p>The planning designations in the draft Plan are appropriate having regard to the subject matter(s) and what is intended. Some designations relevant to Box Parish (eg Green Belt, Cotswold National Landscape and nature conservation safeguards) are in place through other strategies (and cannot be 'adjusted' through the draft Plan). The neighbourhood plan is obliged to recognise these and is not able to influence them. It would not be good practice for the draft Plan to replicate these matters unnecessarily. Many of these are already widely and strongly supported by the community and this is understood by the Parish Council.</p> <p>The draft Plan is highly cognisant of the importance of heritage across the Parish and supports and reflects this through its policies and supporting information. This builds on the strong community support for heritage (both built environment and social and cultural history evidenced through features such as the 'Box People and Places' website).</p>
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		<p>Proposed heritage designations accord with up to date and relevant Historic England advice. Preparation has been undertaken by parties with significant professional expertise and interest in such matters and with support from a planning consultancy in its early stages.</p> <p>The implications of further designations are dealt with in depth in Part 1 (above).</p> <p>The need for improved shop facilities is addressed in the draft Plan in the Community Facilities section.</p> <p>The position with EVs is addressed in a number of policies in the draft Plan.</p> <p>The draft Plan identifies public parking provision and issues around parking across the Parish. It is not in a position to identify further provision.</p> <p>No suggestions for a local museum have been made so far from others in the community. It would require premises / funding / staffing and artefacts.</p> <p>The draft Plan necessarily recognises (and accepts) that some topics (eg road maintenance and public transport services) are beyond the scope of a neighbourhood plan. Notwithstanding this, the draft Plan has been prepared so that it has the potential to be used to advocate for improvements across the Parish and to address issues of concern to the community (eg road safety).</p>
10	<p>General concern about the response from the Parish Council to the Action Group (including the lack of response to the early December item)</p>	<p>Engagement event held on January 5 2026 to address concerns from residents and a full written response endorsed by the Parish Council will be provided.</p>