

## Stretton Neighbourhood Plan

Consultation 8<sup>th</sup> December 2014 – 26<sup>th</sup> January 2015

### Regulation 16 representations

Representation number	Person or organisation	Policy	Representation	Do they want to be informed of decision?
S001	Mr. Graham Lamb Stretton, Burton on Trent	All, especially housing policies	Support the local plan [assume this means neighbourhood plan] and the amount of housing that is identified in this Plan	Yes
S002	Mr G. Gough	All	As a long-term resident of Stretton, I wish to confirm that I am totally in favour of the current Neighbourhood Plan produced by our Parish Council.	Does not indicate. Assume Yes.
S003	Emma Lewsley Stretton, Burton on Trent	The whole plan	I fully support the Stretton Neighbourhood plan. I think it is especially important that there are no more green field developments, only on brown field sites.	yes
S004	Adrian Tuhey Stretton, Burton on Trent	The whole plan	I fully support the Stretton Neighbourhood plan. I think it is especially important that there are no more green field developments, only on brown field sites.	yes
S005	Maggie Taylor, Sport England	Policy S12	In general sport England supports the ethos of the plan, including the Vision and Objectives that seek to embed health and wellbeing as a driver, the aim to protect and enhance open space and community facilities and to improve access and walking opportunities. It also welcomes clear linkages to the Local Plan and the Outdoor sport Investment and delivery Plan for east Staffordshire. The NP, in Policy S12 and Table 3, illustrates on a site by site basis how policies should be implemented by identifying sites	yes

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			<p>for protection/enhancement and clearly explaining their value to the community/local area.</p> <p>Where perhaps it could be clearer, and increase success in securing S106/CIL to deliver improvements, is to actually identify what needs to be improved?</p> <p>The third para of S12 is also perhaps unclear. The main thrust of the policy is to protect identified facilities and support enhancement. The third para. Appears, as an exception, to imply the NP would not seek to protect/enhance outdoor sports facilities on schools sites where there is an overriding need to provide more school places? There is some scope for provision of open space/facilities to offset 'pressures' but it is not required to be suitable for sports usage (e.g. we may see extensions to schools that encroach on the single pitch meaning the size of pitch is no longer big enough to meet the needs of all the pupils at the school). A bit of replacement open space may not be suitable for a pitch layout and the type of facilities is not specified?</p> <p>NPPF para 74 protects playing fields on school sites (and elsewhere) and I don't see that there is a case for an exception to be made in Stretton? I recognise there is significant growth planned which puts pressure on school places however there are two other issues that need to be put in the balance:</p> <ol style="list-style-type: none"> <li>1. The increasing issue of childhood obesity and the need for schools to be able to increase levels of physical activity to help address this – reducing outdoor space on primary schools is contradictory to this objective</li> <li>2. The need for the developer to address and fund any re-provision of playing fields (as well as school spaces) if a loss does arise</li> </ol>	

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			I think the overall objective should be to ensure primary school playing fields are protected on the same lines as other sites (particularly as the schools are listed in Table 3 as important for school and community sport and the overall vision is to improve health and wellbeing) and that if school expansion might lead to a loss of outdoor sports facilities that like for like replacement (quantity, quality, accessibility) is provided so there is no overall loss of functional outdoor sport for the school pupils and community.	
S006	Mrs K Hind Stretton	Whole document	I would like to confirm my support for the Stretton Neighbourhood Plan	Yes (nothing on email so assume yes)
S007	Mr G Hind Stretton	Whole document	I would like to confirm my support for the Stretton Neighbourhood Plan	Yes (nothing on email so assume yes)
S008	Mr R Jeffrey Stretton	Whole document	I would like to confirm my support for the Stretton Neighbourhood Plan	Yes (nothing on email so assume yes)
S009	Mrs M Jeffrey Stretton	Whole document	I would like to confirm my support for the Stretton Neighbourhood Plan	Yes (nothing on email so assume yes)
S010	Miss J A Kirkland Stretton	Protecting Open Space	Para 6.1.26 The Canal and Kingfisher Trail. Development or 'improvement' of paths etc must be done with care. Making them too 'sanitised' will mean they lose their attractiveness and their biodiversity. Table 3 pages 49 and 50. Paths, rights of way etc. Although in my 80's I use a fair number of these – often in spring summer and autumn and sometimes in winter. Long may that continue!	Yes
S011	Miss J A Kirkland	History	There is a mention of investigating this, and mention of the	Yes

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	Stretton		Roma Road (Rykneild street). No mention of a Roman diversion from the straight line, leading to a probable Roman way-station. This was 'lost' when the present Claymills roundabout was built. It was seen by local historian Charles Underhill in 1943, mentioned in conversation with the vicar in the 1960's and reported in my own book about Stretton, published recently. After this, I was shown a photograph clearly demonstrating the bend in the road (which accounted for some dramatic road accidents at times). The photograph may need to be seen soon, to confirm this, as it belongs to another elderly Stretton resident.	
S012	Miss J A Kirkland Stretton	Burial ground	I repeat my previous comments, noted at para 16.01. Many churches nowadays are re-using the older parts of their church yards, which is 'legal' in both secular and religious areas. When the gravestones were re-positioned in the 1970's the whole village (as it was then) was asked about this, and apart from preserving a few stones of locally important people, whole areas were cleared, so probably no objections now. If 'flat' stones were insisted on, then they would not impede the view of the car drivers (which is why the actual churchyard wall was reduced near to the crossroads).	Yes
S013	Miss J A Kirkland Stretton	Protecting Open Spaces	Para 6.1.4. I agree that 'joining up' with Rolleston should be resisted as it would almost certainly mean losing 'the strong sense of identity' of the local communities. Most newcomers comment on the 'friendliness' of the community members which is often missing in larger communities. 6.1.15 I agree that the diverse wild life needs protecting in many places – note particularly paras 16.1.16 to 16.1.23 – any change to the Jinny Trail must be undertaken with care (not to make a 'park' of it) or diversity will be lost.	Yes

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S014	B A Bourne Stretton	All	I am writing to add my support to that which you have already received for the Stretton Neighbourhood Plan.	No
S015	The Bridge Farm Partnership c/o JVH Consultants	Map 4 / Policy S1	<p>The Plan at Map 4 indicates areas of countryside to be protected from development. It includes land north east of the allocated Guinevere Avenue housing allocation. The inclusion of this land in the countryside area is objected to as it is unnecessary to retain this land in countryside. It should be an allocated housing site, to compliment the Guinevere Avenue and St Marys Dive housing sites. The definition of the settlement boundary is a matter for the East Staffs Local Plan the examination of which is suspended. It is not yet known if the development boundaries for the Burton Area are suitable and how much housing land is required. It is therefore inappropriate for the neighbourhood plan to define a boundary that accords only with the outdated 2006 Local Plan, the boundaries of which are held to be out of date by various appeal decisions [ due to lack of a five year land supply] The strategic policies 2, 8 and 31 of the emerging plan are not yet confirmed, as the Inspector has suspended the examination for new fundamental information on the OAHN and the allocation of further housing sites.</p> <p>In all of these circumstances the Stretton Local Plan should not be found a sound document and should not progress until the matters referred to above are clear.</p>	Yes
S016	Outwoods Parish Council	Vision, objectives and policies	<p>Outwoods parish council wish to make the following comments regarding the Stretton Neighbourhood plan:-</p> <p>1) Vision and objectives are good and supported 2) S10 and S12 are also supported</p>	Yes

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			3) the parish council objects to the preservationist and protectionist part of the plan as it is not consistent with national policy (in particular para 74-75 of NPPF)	
S017	Horninglow and Eton Parish Council	Vision, objectives and policies	<p>Horninglow and Eton parish council wish to make the following comments to the above plan:-</p> <p>1) Vision and objectives are good  2) support the protection of services/facilities  3) do not support the protection of all green space - this is not in compliance with the NPPF para 74-75</p>	Yes
S018	Staffordshire County Council	S1	<p>In response to the consultation on the Draft Plan we raised two areas of concern, which have not been adequately addressed. These are set out below:</p> <p>1. Our first objection to Policy S1 in the draft plan was that <i>'The areas of Open space and Countryside include the 3 local school sites - William Shrewsbury Primary, Fountains Special Schools Federation and The de Ferrers Academy. Inclusion of the School sites within Map 3 and thus subject to Policy S1 restricts the Schools' and Education Authorities' ability to respond to changes in population that may require the size of the school to alter. Furthermore, it could potentially restrict the Schools' ability to adapt premises to changing teaching practices /techniques or curriculums. In effect inclusion of the existing school sites within Map 3 and Policy S1 could have a potentially detrimental effect on the</i></p>	yes

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			<p><i>education standards within Stretton and the number of local school places.'</i></p> <p>It is noted that Map 3 (now map 4) has been changed and the school sites removed though these have now been added to Map 14 and the text set out in the consultation statement at row 03/01 to address the County Council has been incorporated into Policy S12 . Therefore, detailed comments on this first matter will be picked up in response to Policy S12.</p> <p>2. The second objection related to the potential need for sites for new primary school provision. At the time of the draft plan consultation work was only just beginning on a site search. Since then the Burton school site search study by AMEC was published in July and is part of the evidence base for the local plan (Examination Library Document D.34. The study identified a potential site off Craythorne Road that met the search criteria for a Primary school. The Study also found that there are very few potential sites for new school facilities to meet the projected need. Therefore, to add further policy restrictions to potential sites will make the already complex task of delivering required school places even more difficult. We therefore request that either Map 4 remove the site off Craythorne Road or that the policy wording in S1 is changed so that it allows for the development of part of the site (2 hectares) for education use. As the bulk of the school site would be made up by the playing fields the</p>	

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			<p>openness of the countryside and green space would be retained. Furthermore, as the playing fields could be made available for community use the development of a school site would address part of the policy aims of S1 in improving accessibility to the open space via use by community groups and sports clubs, which would also play into the health and wellbeing aspirations set out in S1.</p>	
S019	Staffordshire County Council	S10	<p>In response to the consultation on the Draft Plan we objected to the inclusion of the school sites within the list of protected community facilities.</p> <p>The schools listed are public facilities and not commercial enterprises therefore should they need to be redeveloped the decision to do so would be for the public good. The inclusion of the Schools in Policy S10 therefore limits the potential for the Schools and Council to respond to changing circumstances and opportunities to deliver quality education facilities.</p> <p>As noted in response to other elements of the Plan we are looking to increase the supply of school places to meet forecast demand over the local plan period. As such there are no plans to redevelop any of the school sites listed in the plan. However, the ability to do so should not be restricted through this Neighbourhood Plan as it would not be in the best interests of the local community and potentially detrimental to delivery of a quality education system.</p> <p>We therefore request that the schools are removed from the</p>	Yes



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			list of protected facilities and not included on Maps 10-12 as no evidence has been presented to justify the need to afford these facilities the protection of planning policy.	
S020	Staffordshire County Council	S12	<p>In response to the consultation on the Draft Plan we objected to the inclusion of the school sites playing fields being listed for protection as open space. The Parish Council have added additional wording to address this concern. However, we maintain our original objection and request that the school playing fields are removed from the list of locally protected Outdoor Sports, Recreation Facilities and Open Space.</p> <p>School playing fields already have protection in planning nationally and Sport England is a statutory consultee on any planning application affecting playing fields. School playing fields also have a secondary level of protection through Section 77(1) of the School Standards and Framework Act 1998 (SSFA). This Act requires that any disposal or change of use of a school playing field requires prior approval of the Secretary of state, who has a general presumption against the need to change the current pattern of school playing field provision by disposal or change of use. Furthermore, there are additional requirements on schools that suitable outdoor space must be provided in order to enable physical education to be provided to pupils in accordance with the school curriculum and in order to enable pupils to play outside.</p> <p>We therefore contend that there is no necessity to add a further level of protection to school playing fields to what is an already well protected and bureaucratic process. As such we</p>	yes

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			request that the school playing fields be removed from table and maps associated with Policy S12.	
S021	East Staffordshire Borough Council	Various	<p>Many of the comments made on the draft plan still apply, see appendix 1. For the submission consultation we concentrate on the policies in the plan:</p> <p><b>Policy S1 – Development in the Countryside</b>  As commented on in the independent health check, references to emerging Local Plan policies should be avoided, as the emerging Local Plan is at examination. Policy S1 is trying to protect a large tract of land from ‘inappropriate development’ which could be seen as too restrictive and contrary to national policy. The policy has been amended in some respects, on advice in the health check but it has not gone far enough in justifying the restrictive nature of the policy.  NP parishes (and LPAs) are in a difficult situation when there is no up to date Local Plan adopted. . With this in mind we are not confident Policy S1 in your plan will get through examination intact. It relies on emerging policies and also includes our emerging Green Gap policy. This policy was significantly challenged in the LP hearings last month and we are not yet sure whether this policy will remain or be modified in course of our LP examination. It may be better to use the landscape evidence you have in the plan to justify Policy S1 and possibly combine policies S1 and S2 and make it a more landscape and criteria based policy?  The Justification for this policy and S2 are similar and more could be done to use evidence for policy S2 to strengthen this policy.</p>	yes

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			<p><b>Policy S2</b> – Protecting Landscape Character As mentioned previously and in the health check much of the evidence for this policy would be better as justification for policy S1.</p> <p><b>Policy S3</b> – protection and enhancement of local wildlife We recognise this policy has been amended in light of the HC comments. We welcome this policy and it has some useful background/evidence in paras 6.1.16 onwards.</p> <p><b>Policy S4</b> It would have been useful to map the locations of existing stepping stones and wildlife corridors and look to enhance/expand them. Does this policy seek to apply to all new development in the Parish? It might not be appropriate in all cases, as new developments may not be of a scale/location which would warrant demonstration of measures.</p> <p><b>Policy S5</b> Refer to previous comments from draft consultation stage.</p> <p><b>Policy S6</b> – Flooding This policy as written does not add much over national and local policy. Is it needed? Is the intention of the policy to require ALL new development to provide SUDS? If so this should be explicit in the policy wording, as it is over and above that of current national and local policy.</p> <p><b>Policy S7</b> – Protecting Archaeology in Stretton Comments as per HC.</p> <p><b>Policy S8</b> – Locally Important heritage As per HC report, we still consider the policy to be unduly restrictive. The list of assets at the beginning of 6.3.12 should be amalgamated with the longer one later in the paragraph.</p>	

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			<p><b>Policy S9</b> - Parish Walks Policy wording is fine, however map on page 43 and appendix II are not clear and should be re-drawn with a legible key.</p> <p><b>Policy S10</b> See Staffordshire County Council response regarding schools. Reiterate comments made in HC as only some changes have been made in light of advice.</p> <p><b>Policy S11</b> – Protecting Local Employment The use of ‘and’ between criteria a and b could be seen as restrictive. Would be better to use ‘or’.</p> <p><b>Policy S12 – Outdoor sport, recreation facilities and open space</b> The policy justification details Local Green Space policy in the paras 76-78 of the NPPF. The policy, however, does not specifically reference that sites in map 14 are to be designated as LGS. Not sure whether the plan wants to designate the listed sites as LGS or give them a separate open space protection. See representation from Staffs County Council – school sites are protected from development by other national policies. Consider taking school sites out. Site 15 lies predominantly outside the Parish boundary. The policy should only seek to influence sites within the Parish boundary.</p> <p><b>Policy S13</b> – Burial ground provision We are pleased to see previous comments taken on board, this policy is now positively worded and a community aspiration.</p> <p><b>Policy S14</b> – Local Economic Facilities Most recommendations from the HC have been carried out, no further comment.</p>	

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			<p><b>Policy S15</b> – Re-use of existing land and premises  We echo the comments made in the health check – the policy could be considered as overly restrictive. For example new leisure and tourism facilities could be restricted with this policy – is that what was wanted?</p> <p><b>Policy S16</b> – new communications technologies  Consider viability of ALL new development to make provision for HS broadband and other communication networks.  Appendices  Consider deleting Appendix 1 as emerging policies may not be in the final Local Plan</p> <p><b>Appendix 1</b>  Policy S4 Signage and Street Furniture– Are there any specific locations where the street clutter is particularly bad and needs re-thinking and renewing? Thought needs to be given as to how this policy (and all other policies containing proposals) can be delivered. What is County Council’s view? Could the Parish’s top-slice of Community Infrastructure Levy (CIL) money (once ESBC have CIL in place) be put towards certain projects where the problems are greatest? New development sometimes presents an opportunity for improvements to the street scene immediately adjacent. Might the Parish wish to consider whether or not this could be appropriate in Stretton?</p> <p>21. Policy S4 – Some street furniture/signage may be permitted development if the Parish Council, or the County (as highways authority) carry it out. 2<sup>nd</sup> sentence – this could be expanded, since new signage for walking/cycling routes could be secured from development – or could be</p>	

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			<p>what the Parish wish to prioritise in using their 25% top slice of Community Infrastructure Levy for infrastructure projects. It could be an opportunity to set down more detailed design criteria for such signage.</p>	
S022	John Fleming, Gladman Developments	Various	<p>See separate documents: Gladman representation Appendix 1 Burton constraints Appendix 2 Inspectors interim findings to the ESLP Appendix 3 Devizes Appeal Appendix 4 Location Plan</p>	yes
S023	Lorraine and Douglas Wilde Stretton	Policy S8	<p><b>NB, this representation has also been printed out</b></p> <p><b>Stretton Neighbourhood Development Plan – formal consultation</b></p> <p>Please accept our comments on the Stretton NDP below and note that our comments are supplementary to those provided to Stretton Parish Council [SPC] and included in the Consultation Statement. However please also note that our consultation response was not included in full and that a significant component of our response was excluded from the statement. This aspect is also discussed below.</p> <p><b>Comments</b></p> <p>We objected to the inclusion of our own property on a</p>	yes

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			<p>proposed list of local heritage assets on a number of grounds including the failure by SPC to:</p> <ul style="list-style-type: none"> <li>• Follow appropriate guidance in the identification and selection of such assets.</li> <li>• Properly consult with the local community and in particular the owners of proposed local heritage assets.</li> </ul> <p>In addition we consider that such listing by stealth is incompatible with:</p> <ul style="list-style-type: none"> <li>• Governmental initiatives to reduce public sector bureaucracy and in particular the planning burden on householders.</li> </ul> <p>Our reasoning for these conclusions is presented below.</p> <p><b>1. Failure to follow good practice for the identification of heritage assets.</b></p> <p>In 2012 English Heritage provided guidance [Good Practice Guide for Local Heritage Listing] which provides the principles to be followed especially in respect of two key principles around the selection for listing and also in community consultation regarding the nomination and assessment of</p>	

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			<p>assets proposed for listing. The Guidance also provided case studies to demonstrate good practice by a number of councils.</p> <p>The Guidance was referred to in a number of documents that should underpin local heritage asset listing in the Stretton NDP most notably the East Staffs Historic Environment Character Assessment (HEA), 2013 and the Extensive Urban Survey; Burton on Trent (EUS), 2012 both of which discuss heritage for the area. The EUS is particularly relevant in its coverage of Stretton and recommended that <i>“locally important undesignated historic buildings in Stretton could be considered for listing in line with the English Heritage guidance document.”</i> Comments on the draft Stretton NDP by Staffs County Council Environmental Assessment Team referred to both documents whilst noting that <i>“both documents are principally desk based and do not constitute an assessment of the quality of heritage assets”</i>. The EUS recommendation is a generic recommendation and the important component of the recommendation is in respect of following the guidance document. The advice by the Environmental Assessment Team makes clear the need for assessment of any heritage assets.</p> <p>Stretton Parish Council [SPC], has failed to follow the relevant guidance or to apply good practice in the key principles for</p>	



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			<p>listing. This is discussed further below.</p> <p><b>Lack of consultation regarding asset listing</b></p> <p>In respect of consultation, the English Heritage [EH] Guidance provides some important direction as regards selection of assets stating that <i>“public nomination is a key element of the process”</i> of selection and that <i>“The community will play an important role in supporting the overall process especially the development of selection criteria and the nomination of assets”</i>. The process for selection of assets to be included in the list as defined by English Heritage notes that <i>“local lists will be more effective if supported by objective criteria that have been tested through public consultation”</i></p> <p>Furthermore EH noted that <i>“the management of any locally listed heritage asset will be easier if the decision to list is made in partnership with the owner”</i>. SPC failed to request public nominations or to involve the community in developing selection criteria and certainly did not consult with owners. Indeed, SPC response to objections to listing and lack of consultation received as comments on the draft plan, was merely to subsequently issue a letter of owners of potential candidate assets informing them of what had been decided by</p>	

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			<p>SPC. This does not constitute consultation.</p> <p>No response at all was received to our questions [see consultation responses document] as to why the Issues and Options Report that underpinned the NDP only included four nominated heritage assets whereas the draft plan included a hugely expanded list of more than 100 or as to how the nominated assets had been selected and by whom. It is not clear to what extent SPC took advice, if any, from heritage experts. Again this does not constitute proper consultation.</p> <p>By way of example, EH included in the guidance document the process followed by Watford Borough Council which instituted a consultation process to ask local residents and community groups for listing recommendations which were then subject to review and assessment and the list finally produced set out the justification for each listing and what it is about them that is worth protecting. It is unfortunate that SPC failed to follow such good practice preferring instead to present their own list almost as a fait accompli without any assessment as to why the list of 100+ properties are justified for listing.</p> <p><b>2. Failure to follow EH Guidance and the application of</b></p>	

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			<p style="text-align: center;"><b>selection criteria</b></p> <p>EH guidance is clear as to the importance of assigning significance to candidate assets and providing a justification for listing <i>“made on the basis that it satisfies the requirements set by the selection criteria”</i> noting that <i>“selection criteria are essential in defining the scope of the local heritage list”</i>. The NPPF also places emphasis on assets identified as <i>“having a degree of significance meriting consideration in planning decisions”</i>.</p> <p>EH provides criteria to be met by candidate assets directing that <i>“regardless of the means by which candidate assets are identified, at a <b>minimum</b> [my emphasis] nominations need to be backed by information of sufficient detail and accuracy to demonstrate that they meet the requirements set by the selection criteria”</i>.</p> <p>The table below lists the criteria for identifying heritage assets as recommended by English Heritage. We have added comments in column 3 where we think the criteria do not apply to any of the nominated properties. We consider that the only criteria that may apply are those two highlighted in yellow in the table and that of these two, one is weak and the other arbitrary.</p> <p>[see Appendix 1 below]</p>	

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			<p>The EH guidance noted the approach by Bassetlaw council in the development of its candidate heritage assets which placed selection criteria at the heart of its selection process and measured significance in terms of <i>“rarity; representativeness; aesthetic appeal; integrity; and, association”</i>.</p> <p>The number of properties in the UK that would meet the criteria of age as used by SPC is enormous and must be, at the very least, more than 25% of buildings it is clear that there must be robust criteria for selection of those that are important and worthy of local listing.</p> <p>SPC does not appear to have applied any robust selection criteria, has failed to consult regarding criteria, has not demonstrated how criteria have been met and has not provided any justification for listing. The Draft NDP does not include any discussion regarding selection criteria and our requests for information as to how the selection had been made were unanswered in the consultation statement. In addition, although we had included the table above in our comments on the Draft NDP, the table was not included in the consultation statement even though we subsequently contacted SPC with this omission and were promised that the consultation statement would be amended to include the table. This was not done.</p> <p><b>3. Governmental initiatives to reduce public sector bureaucracy and in particular the planning burden on</b></p>	

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			<p><b>householders may be constrained by listing by stealth.</b></p> <p>Recent reform of planning guidance aimed to reduce the planning burden on householders in respect of permitted development. The use of heritage asset listing could potentially impact on householder rights in this respect. We are concerned that such listing will increase the planning burden on owners of property that are listed as local heritage assets. SPC assures [in the consultation statement responses] that development that does not require planning permission will be unaffected by the NDP and local listing. However the EH guidance notes that <i>“Local Planning Authorities [LPA] may consider whether the exercise of permitted development rights would undermine the aims for locally listed heritage assets. In cases where it would, LPA’s may consider the use of an Article 4 Direction to ensure any permitted development is given due consideration”</i>. An Article 4 Direction would remove some or all of permitted development rights. Consequently properties included on the asset list, a list prepared without following due procedure or with any justification as to why the decision has been made and without transparency, may have rights withdrawn in future.</p> <p>Consequently we do not consider that the Stretton NDP complies in respect of local heritage designations. We would however like to be notified of the Council’s decision on the plan</p>	

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			proposal.  Yours sincerely  <b>Lorraine and Douglas Wilde</b>	

APPENDIX 1 TO RESPONSE SO23

Criterion	Description	Our comments
Age	The age of an asset may be an important criterion and the age range can be taken into	The plan may meet some of this criterion but age alone is insufficient grounds for listing.

Criterion	Description	Our comments
	account distinctive local characteristics.	The selection of a 100 year age limit appears to be arbitrary.
Rarity	Applicable for all types of assets as judged against local characteristics.	This criterion does not apply
Aesthetic value	The intrinsic design value of an asset relating to local styles, materials or other distinctive local characteristics.	This does not apply as there is no distinctive local style or characteristic. Moreover some of the candidate assets on the list have been altered such that it is difficult to discern the historic value.
Group value	Groupings of assets with a clear visual, design or historical relations.	This criterion does not apply. The list varies considerably in style and structure.
Evidential value	The significance of a Local Heritage Asset (LHA) of any kind may be enhanced by a significant contemporary or historic written record.	There does not appear to be any <b>significant</b> written record although there are minor historical references to some properties.
Historical association	The significance of a Local Heritage Asset (LHA) of any kind may be enhanced by a significant historical association of local or national note and links to important local figures.	This does not apply with the possible exception of the pub where there may be a link of local importance.
Archaeological interest	This may be an appropriate reason to designate a local significant asset on the grounds of archaeological interest if the evidence base is significantly compelling.	This criterion does not apply
Designated landscapes	Relating to the interest attached to locally important designated landscapes, parks or gardens	This criterion does not apply
Landmark status	An asset with strong communal or historical association or because it has especially striking aesthetic value may be singled out as a landmark within the local scene.	This criterion does not apply
Social and communal value	Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence; often residing in intangible aspects of heritage contribution to the "collective memory"	Most of this criterion (e.g. distinctiveness, coherence etc) does not apply although there may be an argument regarding collective memory although this appears to be weak especially as there has been no mention of

Criterion	Description	Our comments
	of a place.	this in local community comments to date.