

Daventry District Council

Flore Conservation Area

Appraisal and Management Plan

Supplementary Planning Document

Statement of Consultation

Adopted May 2018



Introduction

This report sets out the consultation undertaken on the Flore Conservation Area Appraisal and Management Plan Supplementary Planning Document (SPD). This report is required by regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.

At its meeting on 14th September 2017 the Council's Strategy Group resolved that consultation could take place on the document.

Consultation

Consultation commenced on 18th September 2017 for six weeks. The Parish Council, District Councillors and other consultees and local residents who had asked to be so, were notified.

Publicity

The draft SPD could be accessed from the Planning Policy, Conservation Areas and Consultation pages of the Daventry District Council Website.

Copies were available in libraries as well as the Council Offices at Lodge Road, Daventry.

The Council placed a notice on the Council's website, a copy of which is included at Appendix A.

Consultation Period

Consultation took place with organisations referenced above and local residents on the document for a period of 6 weeks until 5.00pm on the Monday 30th October 2017.

Comments received.

Responses were received, some via letter or email and some via a questionnaire. These are set out in appendix B.

Consideration of Responses

The Council carefully considered all of the comments received. A number of changes were made to the document as a result of these responses. These changes are set out in appendix B.

The representations were reported to the Council's Strategy Group on 8th March 2018 followed by Full Council on 16th May 2018 when the document was adopted.

Appendix A- Flore Conservation Area Consultation Notice

**Flore Conservation Area Appraisal and Management Plan
Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 12, 13 and 35 – Consultation Statement regarding Supplementary
Planning Document**

Daventry District Council is consulting on a Conservation Area Appraisal and Management Plan for Flore. The document will, when adopted, provide advice on the special architectural and historic significance of the conservation area and will supplement the saved policies from the Daventry District Local Plan and the West Northamptonshire Joint Core Strategy.

The Council hereby welcomes comments from any interested party on the document. The document will be available during the consultation period for inspection at Daventry District Council, Lodge Road, Daventry and the libraries at Brixworth, Daventry, Long Buckby, Moulton and Woodford Halse during normal opening hours.

A copy will also be available on the Council's website:

<https://www.daventrydc.gov.uk/ConservationAreas>

The consultation commences on Monday 18th September 2017 and closes at 5pm on Monday 30th October 2017.

Comments in writing should be forwarded to Rhian Morgan, Heritage Policy Officer, Daventry District Council, Lodge Road, Daventry, Northamptonshire, NN11 4FP or e-mail heritage@daventrydc.gov.uk

by **5pm on Monday 30th October 2017** at the latest.

Comments cannot be accepted after this time.

Rhian Morgan
Heritage Policy Officer

Appendix B- Flore Conservation Area Consultation Schedule of Responses (Written and Survey Responses)

Written Responses

Respondent	Summary of Comments	Response	Action
Flore Parish Council	The Council welcomes the proposal of this conservation area for Flore	Comments welcomed.	No change.
Liz Mordue, Northamptonshire County Council Assistant Archaeological Advisor	Thank you for consulting NCC on the above appraisal. The reference to archaeology in the Management Plan is appropriate and I am happy with it. I have no other comments to make.	Comments welcomed.	No change.
Tony Petford	<p>Thank you for your informative document and the presentation in the village hall yesterday on the proposals for the Flore Conservation area. It looks to be a good plan in all aspects & one my wife & I support fully. We particularly like the plans at this time because the nature of the village will change completely after the A45 stops bisecting it next year.</p> <p>One small comment we would like to add to the overall scope of the conservation area, is to add one of the few surviving orchards of Flore (Positioned North of the A45 to the West of Flore Hill) to be within the proposed boundary of Flore Conservation area.</p> <p>There are a dozen apple & plum trees which are hundreds of years old &</p>	<p>Comments welcomed.</p> <p>It is agreed that the conservation area designation would benefit the preservation of the orchard to the north of the A45 in the west of the village.</p>	<p>Amend proposed boundary maps to include the orchard north of the A45 in the west of the village.</p> <p>Page 25, Section 7.2.3, new text after paragraph one: <u>“Several orchards which merit preservation remain within the village. Those at The Hollies and further north on King’s Lane have Tree Preservation Orders. Important specimens also exist to the north of the timber yard on High Street and in the west of the village north of the A45, having retained their formal orchard layout and contributing to the historic character of the</u></p>

	obviously form part of the heritage of the Flore area. Recognition may also assist their longer term survival.		<u>area.”</u>
Berry’s	<p>The following comments are made on behalf of our clients and we trust they will be taken into account in consideration of the representations to the Flore Conservation Area Appraisal and Management Plan.</p> <p>We agree in principle with the designation of a Conservation Area at Flore village, however we do not agree with the extent of the boundary as presently proposed.</p> <p>Paragraph 12 of the Historic England Advice Note 1 - Conservation Area Designation, Appraisal and Management (February 2016) advises: “Conservation area designation is not generally an appropriate means of protecting the wider landscape (agricultural use of land falls outside the planning framework and is not affected by designation as a conservation area) but it can protect open areas particularly where the character and appearance concerns historic fabric, to which the principal protection offered by conservation area designation relates”.</p>	<p>The system of fields to the south of the village of Flore are proposed to be included within the designation for several reasons.</p> <ol style="list-style-type: none"> 1. The field system itself dates from at least the 1776 pre-parliamentary enclosure of Flore. Historic map regression indicates that the majority of fields to the north, east and west surrounding the village have been subject to modern field division and have lost their historic character. As such these fields still clearly represent the historic enclosure in their current layout and are therefore of significance to 	<p>No change.</p> <p>No change.</p>

	<p>In addition Paragraph 127 of the NPPF cautions local planning authorities to ensure that an area justifies designation as a Conservation Area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest.</p> <p>In 3.1 Summary of Significance it is stated that the area to the south is an historic landscape characterised by pastureland, however it must be</p>	<p>the development of the village.</p> <ol style="list-style-type: none"> 2. The fields themselves are prominent in views from the south, and their use as pastureland maintains Flore’s historic agricultural character. 3. The southern and western areas of the village indicate early settlement, including the suggestion that Flore’s earliest market was held in the field adjacent to (on the eastern side) Brodie Lodge playing fields. <p>Whilst the planning system does not confer specific planning controls over the wider landscape, these fields are an important part of the historic and current setting of the village and proposed conservation area.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>argued that pastureland is not unique to the setting of Flore and as such should not be included in a Conservation Area solely on this ground. The referenced Historic England P72 Conservation Principles, Policy and Guidance 2008 states that ‘Significance derived not only from heritage asset’s physical presence but from its setting’. The physical presence nor the setting of these two fields should therefore be seen to have heritage significance.</p> <p>In this regard, we consider the land south of Nether Lane as undeveloped farmland, part of the wider landscape and mostly within the floodplain should not be included within the Conservation Area boundary. The land itself has no architectural or historic interest and the extent of area proposed to be included goes beyond the immediate setting of the village.</p>	<p>Setting is defined in the National Planning Policy Framework (NPPF) as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve." (Annex, Glossary NPPF 2012). The field systems are themselves an historic landscape which have historic significance and contribute to the understanding and appreciation of the development of Flore and its history.</p> <p>The recognition of the importance and contribution of the field systems to the south of the village within the conservation area appraisal and proposed designation acts in accordance with Policy R1 of the WNJCS.</p>	<p>No change.</p>
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	<p>Land on the edge of a Conservation Area is already protected by adopted Policy R1, 'Spatial Strategy for The Rural Areas' of the West Northamptonshire Joint Core Strategy Local Plan (Part 1) which states that any development must "not effect open land which is of particular significance to the form and character of the village" and therefore the Conservation Area designation is not required to extend beyond the for much of the land surrounding the village of Flore.</p> <p>In addition, the land is also subject to the protection policy of the Special Landscape Area Daventry Local Plan Saved Policy EN1- "In recognition of their special environmental qualities, certain areas are designated on the proposals map as special landscape areas. In these areas planning</p>	<p>These fields are not currently within any Special Landscape Area designation and therefore the Special Landscape Area policy cannot be applied.</p> <p>The proposed conservation area designation does not prevent development, but recognises the significance and contribution of the field systems to the south of the village.</p>	
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	<p>permission will normally be granted for development provided that..</p> <p>D) It does not adversely affect the character of the local landscape.” As the Open Countryside surrounding Flore is already protected by this policy Conservation Area status is not required to protect it.</p> <p>The NPPF requires Daventry District Council to provide a positive strategy for conservation to</p> <p>1) understand the significance of heritage assets 2) ensure new development makes a positive contribution to local distinctiveness and 3) encourage the sustainable use of the historic environment.</p> <p>Due to the proposed extent of the proposed Conservation Area boundary this would not in our opinion fulfil what is required from the NPPF. The special architectural and historic interest in Flore is within the developed settlement and therefore creating a conservation area that covers the such a large amount of open countryside would not aid the understanding of the significance of heritage assets.</p>		
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	<p>In summary, we consider that the extent of the Conservation Area is too large. The edited Proposed Conservation Area Boundary above shows an example of an improved Conservation Area Boundary. This edited boundary includes areas where there are listed buildings, but excludes areas deemed not to have heritage assets. This would then mean that Flore’s Conservation Area would be similar to the other 24 Conservation Areas in the Daventry District. As these are appropriately focused on their areas of special architectural or historic interest and do not extend into the open countryside beyond. The current consultation on the Weedon Conservation Area Appraisal is similarly focused on the village’s areas of heritage and conservation significance. It is therefore suggested that the approach to Flore’s Conservation Area should be in consistent with this approach and in accordance with the relevant guidance at the NPPF and provided by Historic England.</p>		
Sue Kerrison	“Very pleased it is now under consideration.”	Comments welcomed.	No change.
Peter Munns	“A most interesting show. Keep up the	Comments welcomed.	No change.

	good work.”		
Sally Miller	“Well presented report. I am pleased to see that important buildings that are not at present listed are being considered as valuable to the village (e.g. chapel, school, village hall, scout hut etc). Why are there two listed buildings not in the conservation area? I am glad that the industrial buildings on the High Street are considered to be of value to the village and any development of them be in a sympathetic form. The village should be proud of its buildings and surroundings and the conservation area is long overdue and to be frightened of.”	Comments welcomed. As discussed with the respondent at the Flore Conservation Area Appraisal public meeting on Thursday 5 th October 2017, there are two listed buildings on the south eastern fringe of the village on Bliss Lane which are not included in the proposed designation due to being divorced from other historic properties of similar local character and as listed buildings are afforded further protection within the planning system due to their designation.	No change.
John Miller	“Impressive report- I fully support the proposal. The village has been messed about for many years so not easy to define areas for conservation- The defined conservation area is “spot on” .”	Comments welcomed.	No change.
Linda Brown	“I feel there needs to be more of a flexible approach to work with people who have listed buildings”	The presence of a conservation area designation does not change the status of listed buildings in the area nor the process through which listed building consent or planning applications are determined.	No change.
Eileen and Peter Fair	“We support the proposal as being in the best interests of the village. The material on display in informative and	Comments welcomed.	No change.

	helpful.”		
David Brown	“Whilst I appreciate the need to conserve areas I feel that the conservation restrictions are too restrictive.”	Comments noted. The planning controls conferred by conservation area designation are put in place to preserve and enhance the character of the local area. Development is not precluded by the presence of a conservation area, rather the designation is a method of managing change.	No change.

Responses via Survey

Respondent	Comment	Response	Action
Do you agree with the proposed boundary for the conservation area? (please see the attached map)			
Jane Rowe	Yes	Comments welcomed.	No change.
Michael Dowson	No, I don't feel Flore needs to be a conservation area, it is a wonderful diverse village but it doesn't need to be a conservation area. If it were, I don't see why our house (49 High Street) or our neighbours would fall into it - there is nothing particularly interesting, exciting or historic about our house or garden.	The 19 th century cottages at Nos. 49 and 53 High Street have been included in the proposed conservation area due to their historic interest and contribution to the group value of surrounding historic buildings.	No change.
Do you think this Appraisal captures the special interest of Flore? Please use the text box to highlight any specific features which you think either have or have not been captured.			
Jane Rowe	The appraisal is an	Comments welcomed.	No change.

	interesting document which highlights the significance of Flore and special interest with regard to the agricultural heritage and the development of the village and its buildings.		
Michael Dowson	Flore doesn't need to be in a conservation area. It is a wonderfully interesting village with a lot of varied properties and a lot of over development of newer houses being built in the gardens of older properties. It can cope with some development, but shouldn't be over developed - the village plan manages that, so, the need for a conservation area just doesn't exist.	The conservation area has a differing remit from both the Flore Village Design Statement and the Neighbourhood Development Plan, in that, as a designation, it directly confers planning controls which the other documents do not. Village Design Statements, Neighbourhood Development Plans and Conservation Area Appraisals are all a material consideration in the determination of planning decisions and help to steer development.	No change.
Do you agree with the candidates for the Local List? (see pages 45-46 of the Appraisal). Are there any more potential candidates whom you would like to suggest? Please use the text box to identify candidates for the Local List, giving an address where possible.			
Jane Rowe	the local list has identified a number of buildings/features of special interest. Add kings Lane 'significant mixed stone, brick and cob wall. Photograph on page 28. part of the Hollies which is listed.	The mixed cob and stone wall on King's Lane adjacent to The Hollies and No.6 King's Lane has been assessed against the Local List criteria and has met the threshold and will therefore be proposed for inclusion on the Local List.	Include the cob wall adjacent to The Hollies and No.6 King's Lane on the list of candidates proposed for inclusion on the Local List in committee report.

Michael Dowson	No, Millennium hall isn't that exciting and the Scout Hut certainly isn't (and I say that as the Group Scout Leader for Flore)	The Millennium Hall and Scout Hut were both assessed against the criteria and met the threshold. These buildings were considered both for their simple architectural merit as well as their contribution to local social history.	No change.
Do you think there is enough clear guidance regarding conservation areas for residents or those submitting or commenting on a planning application or application for listed building consent? Please use the text box to identify specific areas where guidance is either satisfactory or lacking.			
Jane Rowe	the document does not explain processes, time lines or any additional costs to residents, for those submitting planning applications. Is this going to be another layer of bureaucracy which will mean long waits when repairs or improvements need to be acted upon? In this time of increased pressure on the public purse how will planning applications be managed in a timely and efficient manner? Who picks up the bill for additional work needed?	<p>Planning application costs for applications within conservation areas are the same for those without, and information on these can be found on the Daventry District Council website at: http://ecab.planningportal.co.uk/uploads/english_application_fees.pdf. There are no fees for notification of works to trees in conservation areas or for applications made as the result of the presence of an Article 4 Directions. It is agreed that it would be useful to include links to where information on planning fees can be found within the document.</p> <p>Maintenance is not controlled by the planning system, and certain minor works will remain permitted development, such as the changing of windows and doors or painting the exterior of a dwelling, unless the property in question is a listing building or subject to an Article 4 Direction. Information regarding Article 4 Directions can be found in the appraisal document at page 44, or on the Daventry District Council website.</p>	Page 48, Section 11.1, new text after paragraph 7: <u>"Information regarding planning fees can be found online at http://ecab.planningportal.co.uk/uploads/english_application_fees.pdf."</u>
Michael Dowson	Planning in Daventry District is a joke, it doesn't follow national government or local	Conservation area designation does not serve to halt development, but aids in managing change in order to preserve and enhance local character.	No change.

	district guidance. I've not found anyone in the area who agree with the planners - local parish council and villagers can ok something and the planners can just decide against it with no reasoning. I think falling into a conservation area would be a disaster for any future enhancements or developments within Flore.		
Do you think there are any actions missing from our Management Plan? (see pages 49-50 of the Appraisal) Please use the text box to identify specific actions, giving justification where possible.			
Jane Rowe	49 11.1 Planning controls. If planning is needed to 'prune, lop, top, fell trees or alter windows etc. how will this process work? Will it be an added layer of bureaucracy? will this mean a cost to the house owner? How will DDC manage this increase in work load so permission is granted in a timely manner? Will there e more resource made to DDC or is there a danger of planning applications being long and protracted?	Controls within conservation require that six weeks written notification be provided to the District Council before the commencement of works to trees. Decisions whether to refuse the works by serving a Tree Preservation Order must be made within these six weeks. There is no fee for providing notification. The alteration of windows remains permitted development for dwellinghouses unless the property is a listed building or is subject to an Article 4 Direction.	No change.
Michael Dowson	no.	Comments noted.	No change.

Do you think the proposed Article 4 Directions (see page 45 of the Appraisal) would help to preserve special features of the conservation area? Please use the text box to identify specific locations or features at risk or permitted development rights which you feel should be removed.

Jane Rowe	<p>I understood the Flore Village design was a document which was adopted having been widely consulted upon with in the village of Flore, the purpose of which was to shape future planning applications, so I am wondering why there is the need for this proposal to designate parts of Fore as a conservation Area? I understood the village design was bound by legislation and that DDC should take account of it in all planning applications. The Flore Conservation Area and Management Plan makes little reference to the Flore Plan.</p> <p>We need to be careful that we are not agreeing to further layers of bureaucracy when there should already be safeguards in place through existing planning processes.</p>	<p>The Flore Village Design Statement (2008) has been adopted as a Supplementary Planning Document and as such is a material consideration in the determination of planning decisions. The Village Design Statement (VDS) and the Conservation Area Appraisal have differing remits, in that conservation area designation confers specific planning controls, which VDS documents do not. The Appraisal and Management Plan were written with reference to both the Flore Village Design Statement and the Flore Neighbourhood Development Plan, as these documents work together to shape development in the local area.</p>	No change.
Michael Dowson	None of the features listed are that special. There are	The proposed conservation area designation and appraisal were prepared using Historic England	No change.

	grade II listed properties to protect specific properties, we don't need a conservation area to put a global protection on anything.	national guidance relating to the designation, appraisal and management of conservation areas. All those assets put forward as candidates for the Local List have been assessed against criteria which was prepared with reference to Historic England national guidance on Local Heritage Listing.	
Are there any other matters within the Appraisal and Management Plan that you would like to comment on? Please reference any comments to the specific part of the Appraisal where possible (using paragraph or section numbers) and, if seeking a change be clear what change is sought and provide justification where possible.			
Jane Rowe	There are a number of inaccuracies in the document. page 17, 7.1 first paragraph." the village shop trades...at top of Spring Lane" should be Sutton Street. 2nd paragraph " the wide grass verge... to a small cross roads with spring Lane" should read Kings Lane. 11.1 planning controls Whilst I support maintaining the village character both buildings an spaces, I believe that we also need to be open to the use of some modern techniques and materials.	Comments noted. These details will be corrected in the final version. It is encouraged that works to historic buildings utilise traditional materials and techniques which maintain the historic interest and significance of the asset. However, this does not preclude the use of modern materials and processes in appropriate circumstances. Every application will be different and each application is viewed entirely on its own merits. There are no specific developments prescribed for those areas which are identified as potentially	Page 17, Section 7.1, paragraph one new text: "...at the top of <u>Sutton Street Spring Lane.</u> " Page 17, Section 7.1, paragraph two new text: "...cross roads with <u>Spring Lane King's Lane.</u> " No change. No change.

	<p>Sometimes the use of new modern materials can preserve the fabric of treasured buildings eg the church. Long protracted planning applications can render choices being made that could have been more innovative and less attractive to thieves.</p> <p>10.1 Opportunities for Enhancement. Agree that the identified areas/buildings would benefit from enhancement schemes but it is unclear what these are? would there be government funding in the form of grant funding to help with the development/renovation of these properties?</p>	<p>benefitting from enhancement. These areas have been highlighted so that their beneficial enhancement may be prioritised in the future. Whilst grant funding does not currently exist, that these areas have been highlighted provides the opportunity for their prioritisation should it become available in the future.</p>	
Michael Dowson	<p>Only a point about q. 12 below - you say would you like to know when the SPD is adopted - don't you mean IF not WHEN? Or is this whole consultation just a hoop you have to jump through and</p>	<p>Having reviewed all responses to the consultation, District Council officers make recommendations to the Council who then make the final decision whether or not to adopt the designation and Appraisal document.</p>	<p>No change.</p>

	you've actually made your mind up and won't take into account anyone's feedback?		
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