

Responses to Representations made on the Pre-submission Draft Stratford Neighbourhood Development Plan

Policy BE11

Representations: Total received 20

Number in Support: 8

Modification Proposed:

This Policy will be deleted and the references to Listed Buildings and Scheduled Ancient Monuments will be included in a new all-encompassing policy entitled Designated Heritage Assets (Policy BE10). There will be minor modifications to the wording of this policy to reflect the NPPF test and the responses below.

Individual Representations and Steering Group Responses

Code Number	Full Name	Organisation represented (where applicable)	Policy BE11	Neighbourhood Plan Steering Group Response
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Statutory Consultees' Comments				
1001	Stratford District Council	Statutory Consultee	<p>Should be "town's" in 2nd line.</p> <p>Will the physical extent of the town's 'historic spine' be known to all readers of the document? Perhaps consideration should be given to mapping this spatially, in order to make it easier to interpret policy.</p> <p>The Policy repeats Local Plan and existing Planning</p>	<p>Agreed.</p> <p>The extent of the historic spine will be inserted and reference made to the guide.</p> <p>Agreed to a certain extent but the</p>

			Conservation Policy.	NDP references the historic spine and wishes to emphasise the importance of the Heritage assets of the Neighbourhood Area.
1008	Historic England		<p>We would, however, question the utility of Policies BE11-12 since these designated heritage assets are already stringently protected by specific legislation, such that the inclusion of policies in the Neighbourhood Plan would seem to offer no additional benefit.</p> <p><i>“New development must take account of known surface and sub-surface archaeology, and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology must not be taken as proof of absence”.</i></p>	<p>The NDP does not wish to be silent on this issue. The repetition improves the plan’s soundness.</p> <p>Suggested wording will be added to BE11 (now BE10)</p>

Agents and Developers' Comments				
508	Pegasus Group re: Gallagher Estates	Policy BE11	<ul style="list-style-type: none"> As currently drafted the policy does not conform with the NPPF. The word ‘harm’ should be replaced with 	<ul style="list-style-type: none"> The policy will be amended to include: “Proposals which cause substantial harm...” this is the phrase in para 133 of the NPPF. An additional sentence will be added as follows: “Proposals which result in less than substantial harm should be weighted against the public benefits that they bring”.

512	RPS re Taylor Wimpey and Miller Homes		It is considered that this policy should be adjusted to refer to 'significant harm', rather than simply 'harm'. This is more consistent with the provisions of paragraph 132 of the NPPF and enables an evidence led approach towards assessing the significance of heritage assets within the neighbourhood plan area.	The policy will be amended to include: "Proposals which cause substantial harm..." this is the phrase in para 133 of the NPPF. An additional sentence will be added as follows: "Proposals which result in less than substantial harm should be weighted against the public benefits that they bring".
513	Stansgate planning re Mr C Swan		This policy is at odds with the National Planning Policy Framework paragraphs 129-134 where significance of the asset and level of harm is assessed and weighed against the public benefits of the proposal. As written, any harm would preclude any proposals for development.	See above comments.
514	Stansgate Planning re Town Trust		This policy is at odds with the National Planning Policy Framework paragraphs 129-134 where significance of the asset and level of harm is assessed and weighed against the public benefits of the proposal. As written, any harm would preclude any proposals. Furthermore, for ease of interpretation and completeness, it would be helpful if the Historic Spine were defined or shown on plan.	See above comments.
516	Framptons re ROSCONN Group		This policy fails to accord with the provisions of Statute (Section 66(1)) and fails to have regard to the provisions of the NPPF Section 12. The wording of the policy is far removed from the cost / benefit approach that is set out at paragraphs 133 and 134 of the Framework.	See above comments.
519	Daniel O'Donnell		These policies are not in accordance with the cost /	See above comments.

			benefit approach of the NPPF and are not in accordance with statute.	
520	Charles Vickery		These policies are neither in accordance with the cost / benefit approach of the NPPF or statute.	See above comments.

Residents' Comments				
025	Jane Dodge		I agree	Supportive
053	Geoffrey Prince	Several local residents	We object to this policy as currently worded as it does not reflect the guidance set down in the NPPF. Specifically we propose that the third sentence be amended to read as follows: 'To be acceptable proposals must seek to sustain and enhance the important physical fabric and settings of listed buildings and Scheduled Ancient Monuments.'	Wording will be amended to conform with NPPF
056	Martyn Luscombe	Stratford Voice	Strongly support, subject to 'be resisted' being replaced by 'not be permitted'.	Supportive generally. Wording conforms with NPPF
057	Trevor Honychurch		Agreed	Supportive
095	Eric Ward		Strongly agree	Supportive
119	Liz Thompson, Director of Communications	Royal Shakespeare Company	We support the recommendations to protect the special fabric and interest of listed buildings and to enable the appropriate and sensitive restoration of listed buildings. This has particular relevance to our current historic restoration of our Swan Wing, the oldest part of the theatre, and our future plans to revamp and redevelop our Costume Workshop on Waterside to provide a 21st century working environment.	Supportive
131	Clive Alan Griffiths		I live at 117 Tiddington Road and my land is identified as being with in the defined scheduled	The extent of the Scheduled Monument is shown in detail on

			monument, but in contrast, the houses adjacent to me, 119 and Reading Court are not, clearly this is an error. Furthermore the houses across the road should also be designated as they are within the scheduled monument as well.	Historic England website, and our plan is only indicative at this scale.
201	Graham John Nicholson	The Inland Waterways Assoc. (Warks branch)	Strongly agree	Supportive
228	John Campton		Support	Supportive
253	Daniel O'Donnell		These policies are not in accordance with the cost / benefit approach of the NPPF and are not in accordance with statute.	NDP Wording conforms with NPPF
278	Joan Graham		Have my support as long as they really improve conditions for everyone.	Supportive