

Mr Alan Munn
Planning Policy and Conservation Manager
South Northamptonshire Council
Moat Lane
Towcester
Northamptonshire, NN12 6AD

26 February 2021

Our Ref:

Your Ref: Deanshanger Village Design Statement

Dear Mr Munn

SUBJECT: DEANSHANGER VILLAGE DESIGN STATEMENT

We are writing in reference to the consultation on the Deanshanger Village Design Statement, which South Northamptonshire Council intends to adopt as a Supplementary Planning Document ("SPD") following a six-week consultation period. These comments have been prepared by Tetra Tech Planning (formerly WYG Planning) for, and on behalf of the Opus Partnership.

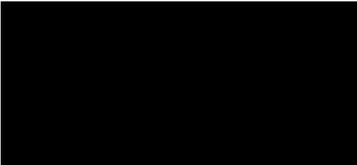
The Opus Partnership has a strong interest in Deanshanger in that it is the owner of the former Elementis site, a large brownfield site within Deanshanger, located to the west of Hayes Road. Outline planning permission for 15 custom-built detached dwellings, three live/work units and seven self-contained employment units was secured in November 2015 (reference S/2014/1941/MAO), with the application for reserved matters (appearance) submitted in November 2018 for part of the site (ref S/2018/2117/RES); this application has yet to be determined. As part of securing permission, the Opus Partnership undertook extensive consultation with the local community and its representatives.

Whilst our client is generally supportive of the principle of design guidance, it is disappointing that this is the first time they and other interested parties have had the opportunity to comment on this document and provide input from developer perspective. Having reviewed the document we have a number of concerns in its current form. It is felt that many of the objections and comments made within this response could, and should, have been addressed prior to this formal stage of consultation.

As such, having now had the opportunity to review the document, The Opus Partnership wishes to **object** to the proposed adoption of the Deanshanger Village Design Statement ("DVDS") in its current form. Whilst there is evidently a considerable amount of work that has been put into the document by the authors, there are however a number of flaws that must be rectified before it can fulfil its role as an SPD and be used in the determination of applications within the village of Deanshanger. It is not our client's intention to be obstructive, however, we firmly believe an improved design statement will better serve the community and deliver the stated objectives.

Our detailed comments and observations are set out as annex 1 to this letter. We would be grateful to receive notification of the adoption (or further updates on the preparation) of the SPD via Planning.MK@tetrattech.com [REDACTED]

Yours sincerely,



Director- Planning
Tetra Tech Environment Planning Transport Limited

Enc.

Annex 1: Detailed Comments

1.0 PURPOSE OF A SPD

The Planning Practice Guidance (“PPG”) sets out the role of supplementary planning documents, namely that they should *build upon and provide more detailed advice or guidance on policies in an adopted local plan*. Whilst (once adopted) they are a material consideration, they do not form part of the development plan and as such cannot introduce new planning policies into the development plan, nor should they “*add unnecessarily to the financial burdens of development*”¹.

As has been upheld via the High Court, SPDs must not stray into the territory of Development Plan Documents (DPDs)². Within the Regulations³, SPDs are defined negatively; namely that they are anything that is not a local plan, e.g. something that contains statements and policies regarding environmental, social, design and economic objectives relevant to the attainment of development and use of land. However, in practice this generally has been interpreted as SPDs not allocating land, making site allocation policies or setting development management policies to guide application decisions. We are therefore satisfied that the principle of a VDS being adopted as an SPD meets the legal requirement(s) in this regard.

Historically, South Northamptonshire has adopted several Village Design Statements as SPDs. As set out above, there is no objection to the *principle* of such documents being formally adopted as SPDs by the Council for guidance within decision making. In many cases, a VDS is more appropriate than a formal ‘Neighbourhood Plan’. Indeed, where robustly prepared, Village Design Statements are beneficial in understanding the finer grain and characteristics that make each village unique and can aid making successful applications.

However, whilst the Opus Partnership is generally supportive of design guidance, having reviewed the DVDS, our client is of the view that there is a strong risk that due to the way it is currently drafted, the guidance could be (incorrectly) interpreted and applied rigidly as though it were policy. As such, they **object** to the proposed adoption of the Deanshanger Village Design Statement (“DVDS”) in its current form on the following grounds:

- The Zones within the document are not sufficiently evidenced. Zone 1 has been drawn too widely incorporating modern development that has not been subject to character assessment. The principles for this zone, as drafted, cannot be effectively applied to the whole of the area.
- The inclusion of modern development within Zone 1 (specifically Maltings Row, Roberts Close, Boswell Drive, The Smithy and The Beeches) dilute the character cues for Zone 1. It is inappropriate, undesirable and ineffective for these areas to be required to meet the standards of design expected for the Conservation area.

¹ Paragraph: 008 Reference ID: 61-008-20190315

² William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017).

³ The Town and Country Planning (Local Planning) (England) Regulations 2012 (Reg 8(3))

- The guidance, as drafted and applied to the area of Zone 1 but *outside of the Conservation Area* will result in additional financial burdens to development. These are addressed further under specific comments below.

In summary, we consider that there is significant potential for such misinterpretation or misapplication of the DVDS on the basis of its current wording, which may also impose unreasonable restrictions on existing homeowners, particularly those that live within existing modern housing within the proposed Zone 1.

Without amendment, we do not consider that the DVDS meets the guidance for SPDs as set out in the PPG and will result in the guidance, particularly in relation to Zone 1 being applied as policy, together with the imposition of additional financial burdens for development located within Zone 1 but outside of the Conservation Area boundary.

To address these concerns the following changes are required:

- Removal of the former Elementis Site, Maltings Row, and other existing areas of modern development not within the designated Conservation Area from Zone 1 and re-designated into its most appropriate character area.
- Amendments to the text (as suggested for each principle below).

1.1 NATIONAL POLICY CONTEXT:

Chapter 12 of the National Planning Policy Framework highlights that good design is a key aspect of sustainable development. Paragraph 124 explicitly states that, "*being clear about design expectations, and how these will be tested, is essential for achieving this*"⁴. The NPPF further supports the development of design policies with local communities so that they reflect local aspirations. A key role of design policies (and guidance) is to ensure that developments function well and add to the quality of an area; are visually attractive as a result of 'good' architecture; are sympathetic to local character and history *whilst not preventing or discouraging appropriate innovation or change*; establish or maintain a strong sense of place; optimise the potential of the site; and create places that are safe, inclusive and accessible.

Paragraph 127 encourages visual tools to create clarity. However, it states that their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified. Paragraph 130 of the NPPF goes further to ensure that local design standard and style guides in plans and SPDs should be followed with development refused for poor design that fails to take the opportunities available for improving the character of an area. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a reason to object to development.

⁴ National Planning Policy Framework (February 2019)

Government is currently consulting on revisions to the NPPF, which incorporate the recommendations of the *Building Better, Building Beautiful Commission*. This will require local planning authorities to prepare design guides or codes consistent with the national principles to create beautiful and distinctive places with a consistent and high-quality standard of design and to avoid ubiquity in housing design which does not reflect local styles and distinctive characteristics.

2.0 PROPOSED CHARACTER ZONES:

The premise of the DVDS is based on a series of Zones, which are used to apply a set of local Design Principles *more simply* given the complex character of the village. These have been identified based on geographical and chronological information. There are four zones, as described within the DVDS:

- **Zone 1:** the section of the village encompassed by the Conservation Area and the historic core of the village. The DVDS states other roads such as The Beeches and new roads off the High Street have been included in Zone 1 *because they are close geographically*.
- **Zone 2:** includes the western area but also the modern village centre
- **Zone 3:** consisting almost entirely of the estates built in the late 1960's and early 1970's and are all located to the northern fringe of the village; and
- **Zone 4:** which largely consists of the newest developments in the village (post 1990).

It is unclear from the documents subject to this consultation the extent to which the wider community has been engaged within the preparation of the document and the drawing of the proposed zones, which could have significant impacts on the flexibilities of property owners and developers particularly within Zone 1.

In principle, our client supports the principle of using zones to apply design policy particularly in villages such as Deanshanger, which have several character areas. Zones 2 and 3 are consistent and appropriate. However, such zones do not have to be contiguous and must ensure that the guidance can be applied.

It is our view that the proposed Zone 1 has been drawn too widely and consequently dilutes the value of the historic core. As such, some areas including the former Elementis Works site, Maltings Row, Roberts Close, Boswell Lane should be removed from Zone 1 and be moved into an extended Zone 4 wherein they would fit more appropriately. The Beeches should be moved to the most appropriate zone based on its character, rather than geographical proximity.

Moreover, having reviewed the document it is considered a disservice to the village that so much of its industrial heritage has been omitted or glossed over. This includes its reason for growth (as a turning point of the Buckingham arm of the Grand Union), its links to the railway heritage at Wolverton (and indeed the tram link that existed) and latterly the growth in industry which led to some of the more extensive development at the village. In our view, these are some of the matters that sets Deanshanger apart from other villages in South Northamptonshire which have grown as a result of forestry, agriculture or leatherwork. The DVDS is an opportunity to celebrate this uniqueness.

2.1 ZONE 1 - THE HISTORIC CORE:

The explanatory text on page 5 states, "*Zone 1 is largely the section of the village encompassed by the Conservation Area and contains the historic core of the village. Other roads such as The Beeches and new roads off the High Street have been included in Zone 1 because they are close geographically.*" It is important to note, being in close geographical proximity is not an appropriate justification within a document

intended to guide design matters, but rather zones should be based on a consideration of character and the unifying features to ensure that guidance can be applied consistently and effectively across the area.

The principle of Zone 1 (and the application of the principles in Section 2 of the DVDS) is generally considered appropriate for the historic area and other historic buildings. It is recognised that this zone does not have to be concordant with the Conservation Area boundary and there may be justification for including some areas in respect of setting where appropriate. This should be appropriately evidenced in accordance with the relevant national policies and guidance on conservation areas. Nevertheless, the zones must allow for the effective application of the principles (DP1-DP25) as relevant and appropriate to the specific zone. Many of these are drafted specifically for historic buildings/areas (e.g. the conservation area) and are impractical to apply to the more modern developments or future development sites currently proposed to be incorporated to be within Zone 1.

As currently proposed, Zone 1 encompasses both the Conservation Area together with modern, post 1990s developments (see Figures 1 – 6 below (images © Google Street View)). These include late 20th Century developments (e.g. Roberts Close and Boswell Lane), The Smithy (rear parking courts) and Maltings Row, together with Bridge walk, Home Farm Close and The Beeches which are comprised of standard house types. It also draws in the two properties at the bottom of the high street adjacent to the Coop Store, which are specifically excluded from the Conservation Area, and the former Elementis Site.



Figure 1: The Smithy (South of High Street)



Figure 2: Maltings Row



Figure 3: Roberts Close



Figure 4: Boswell Lane



Figure 5: Canal Lane (Zone 4)



Figure 6: The Beeches

Within the text for Zone 1, there is no assessment of these areas. The principles have been drafted to apply specifically to historic buildings and the Conservation Area through reference to 'historic fabric', e.g. in relation to uPVC windows and doors, chimney stacks and sash windows. This makes it challenging to apply the principles effectively to existing development sites where principles such as layout and design have already been established through the planning system.

Zone 1 also includes the former Elementis site. The boundaries of this site include Maltings Row (proposed Zone 1) to the west, Canal Lane (proposed Zone 4 (figure 5)) to the north, Lower Hayes Road (proposed Zone 4 only for the length of the development site) and Stratford Road/High Street to the south. The east side of Hayes Road, with residential development is located within Zone 4 supporting our position that the character of the former Elementis Works site is more closely aligned with Zone 4. Given the size of the site, and the surrounding context, which is now heavily influenced by modern construction, there is no clear justification for including it within Zone 1 due to character or historic significance. The development which has permission on the site (Lower Hayes Road - West) and the new development at Canal Lane and Maltings Row as part of the design rationale. The need for this site to reflect its immediate surroundings has already been determined through the planning process. It appears that the site has been artificially pulled into Zone 1 to impose particular design preferences. The principles for Zone 1 cannot be effectively applied to this development site whilst reflecting the permission granted for 15 Custom Build houses, offices and workspace.

It is requested that the boundaries of Zone 1 are re-drawn to be consistent with the Conservation area. Land at Maltings Row and the Development Site west of Hayes Road should be in Zone 4 which provides a more appropriate set of principles. Other areas should be re-assigned to the most appropriate character areas dependent age/design. This change will provide a closer alignment with the relevant design principles in the DVDs.

3.0 DVDS - GENERAL DESIGN PRINCIPLES

Section 2 of the DVDS contains the design principles for the whole village. Overall, this section is generally considered appropriate providing useful background on the village and the key matters that have been considered in preparing the more detailed advice. We would however make the following observations, comments and requests.

DP1 Village Structures 1:

These are generally unclear within the Zones and there appears to be little analysis of the village structures/layout. A clear list of structures is required to prevent ambiguity.

In terms of design principles, these are often hidden within the text of the relevant zones. However, this could be remedied through key principles being set out within a text box/similar for each zone (with the remaining sections amplifying these policies), which would allow those making applications or assessing proposals to easily find key priorities and principles.

DP2 Village Structures 2:

As set out above, Zone 1 has been drawn too broadly and incorporates areas of modern development without supporting character assessment(s) of these areas. These areas do not tie in with the associated structural elements on that zone. As such, this principle cannot operate effectively for Zone 1 in its current form. **We request that the former Elementis site (and neighbouring development) is removed and included within Zone 4.**

DP3 Open Space and Views:

DP3 addresses open spaces and views, with reference to Map 1 in the appendices of the DVDS (extract Figure 7 below). These open spaces include designated village greens, sports areas and verges (no views are identified and mapped). Many of the spaces, such as the village greens, are important to the character of Deanshanger which has grown over the centuries.

We **object** to the inclusion of land on the eastern boundary with Hayes Road as important green space (shown below). A definitive list of the views are also required to enable the effective application of the guidance.

It is acknowledged, based on a satellite image (Figure 8), this area looks like it is comprised of a dense hedgerow/mature tree belt. However, the reality (as shown in the street view image - Figure 9 and Figure 10 (from 2009)) this is largely self-seeded with few notable specimens and has largely matured over the past few years, following the demolition of the Elementis works, rather than being a designed/character feature.

We suggest that the character of this area is one with low boundary walls, punctuated by trees and hedges, rather than a continuous frontage. Indeed, as part of the planning proposals for the site these weaker trees have been removed will be replaced with a wall in appropriate materials. Not only will this mirror the rest of Hayes Road, it is also important to manage the difference in topographical levels. The reasoning and

justification for this approach are already known to and understood by the Parish Council and local community.

Figure 7: Green Space (Map 1)



Figure 8: Google Satellite View of site



Figure 9: Google Street View (South) - 2011



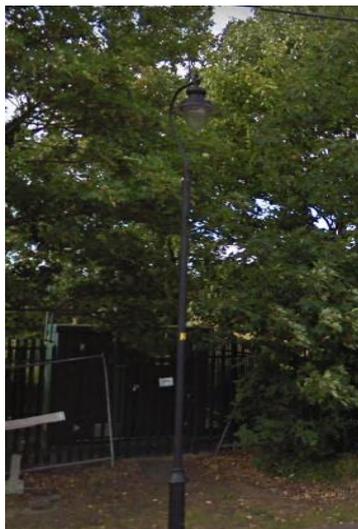
Figure 10: Google Street View (South) - 2009



Figure 11: Google Street View (Junction of Hayes Rd & High Street)



The southern corner of this green area (within the conservation area) is currently occupied by an electricity substation and other infrastructure (see Figure 11: Google Street View (Junction of Hayes Rd & High Street)



). This is considered to make no positive contribution to the Conservation Area and other planting/screening will be required to help provide a positive entrance to the village from Stratford Road.

Whilst we have focused on the green space close to our Client's land interest, having reviewed each of the spaces around the village we are unable to see consistency in how they have been identified and the justification for their inclusion. There does not appear to be a reference to any objective assessment of the

green spaces based on a consistent methodology. Without understanding the significance of each to the character of the village, the guidance does not assist in delivering a design-led response which is one of the key purposes of the DVDS.

DP4 New Buildings:

The practical application of DP4 requires the zones to have been defined appropriately. For reasons set out elsewhere within this response, we believe that Zone 1 has been drawn too broadly diluting the character and true historic value of this zone and for reasons set out above, we consider Zone 1 should be re-drawn to the Conservation Area only.

Within the DVDs there is no definition of large-scale development to which the guidance should be applied. It would be more useful to use a standard definition e.g. major development (as defined within relevant planning law) or an evidence-based local threshold. Moreover, there is a considered risk that drawing and applying only the character and design cues from Zone 1 (as currently drawn) is likely to lead to an inappropriate “mock” village, rather than address more fundamental design considerations such as layout.

Subject to the Elementis site being moved to Zone 4, the statement in **DP4** that, *“where development takes place within one of the character zones identified, it should take reference from that character zone”* is welcomed and supported. This is an appropriate response recognising the various character and architectural styles within the village.

DP5 Countryside 1:

Whilst Deanshanger is a village, we believe that this principle should also highlight Deanshanger’s multifaceted industrial history.

DP6 Countryside 2:

Whilst supported in principle, the DVDS must also recognise the financial implications and potential burdens on the owner to retaining buildings for the purposes of visual amenity.

DP7 Form and Building Materials:

The principle is generally supported. However, within Zone 1 we note that a percentage (40%) has been included for ‘stone’. This is considered an arbitrary figure and has been determined without proper evidence.

A high proportion of stone can lead to viability issues and trade-offs with affordable housing provision (something which has been under delivered across the district). The use of stone should be flexible and appropriate to the building’s location, immediate context and site-specific design response. As such, **we request that specific percentages are deleted, and the most appropriate materials agreed on a case-by-case basis considering the immediate surroundings and other relevant considerations.**

DP8: Front Gardens:

It should be noted that in many cases the use of land for parking within a building’s curtilage does not require permission and so this principle may be challenging to apply and deliver.

DP9 Building Materials- Stone:

We would welcome further examples to ensure that this principle can be applied.

DP10 Stone Boundary Walls:

The principle is supported.

DP11 Building Materials Brick:

Further clarity is required on the definition of "close to" to ensure that this principle can be applied effectively. As stated elsewhere we are concerned that the statement regarding bricks is too rigid and ignores the industrial past.

DP12 Windows and Doors:

We support the statement that, "*where possible, PVCu windows should be resisted in older buildings where timber had been used originally.*". However, within Zone 1 it is implied that timber frames are expected in all development(s). Clarity as to how this will be applied would be welcomed as in many newer developments, including those that are within the currently proposed Zone 1, the requirement for timber frames may place additional financial burdens on developers (when taken together with the requirement for stone and other materials) or existing homeowners. Additionally, these may not be the most appropriate materials in the context of either the particular site/scheme or current energy efficiency standards and other requirements of the building regulations, for example. Furthermore, the DVDs needs to recognise that there are a wide range of doors and windows beyond those included within the design guide even within the Conservation Area (and wider Zone 1 as proposed, which draws in Woodman's Close, Maltings Row etc) including uPVC windows and doors.

Furthermore, for development specifically within the Conservation area there are now a range of conservation grade products made from uPVC that may be suitable dependant upon the specific building and its historic significance.

The final sentence should be amended to read: **For existing modern and new buildings less importance is paid to traditional materials to ensure that new buildings can meet other regulations, such as energy efficiency. Doors should be of traditional form in the historic core, but alternative materials may be acceptable in modern developments.**

DP13 Roofing Materials:

The principle is generally agreed. However, the statement "*Within the historic core of the village, or areas close to it, a presumption should be made in favour of natural and traditional materials – small clay tiles, natural slate or thatch*", at present would apply to a variety of sites including those proposed for development (Appendix 4 of the DVDS), which may result in additional financial burdens or development that is out of keeping with the surrounding character (see assessment of Zone 1).

Furthermore, there is a risk that new development within Zone 1 becomes a pastiche and stifles more innovative, high quality design approaches that could complement yet be sympathetic to the Conservation Area.

New development within Zone 1, but not within the Conservation Area, should be developed in accordance with the surrounding character having regard to any matters of setting, without

stifling innovation. It must recognise there is a wide variety/palate of materials even within the Conservation Area. This should be made clearer within the DVDS.

DP14 Roof Design/Roofscape:

The statement "*Within the historic core, it is desirable that roof pitches should replicate those in close proximity to any proposed development or extension*" is generally supported.

Nevertheless, we believe that the assessment has been quite narrowly defined, particularly in reference to hipped roofs where there are several distinctive properties of architectural merit within the Conservation Area with this roof type, and it is a roof type common to Puxley Road, Ridgmont, North Way and Folly Road. It is also extensively used more recently in Honey Hill Drive, Kings Hill Drive and Goosemere and therefore the blanket resistance to this roof type is inappropriate given it has become part of the character of the village.

In respect of solar panels, roof lights and other features we would welcome clarification that this applies to historic (e.g. listed/ properties within the Conservation Area only).

DP15 Architectural Features:

The principle(s) are generally supported.

DP16 Chimneys:

The DVDS states, "*These [Chimneys] must be a priority in any new development whether within the historic core or in the other zones identified at the beginning of this document. In zones where chimneys have not previously been included, new developments within those areas should encourage the use of chimneys (whether working chimneys or dummy stacks) in order to provide a more interesting roofscape.*"

This statement, if applied rigidly limits the options for modern construction or other innovative design, preferring historic 'replicas'. While in some high-quality, bespoke developments it may be inappropriate to include chimneys as prescribed within DP16, as currently drafted, this statement is too rigid and will not allow for other design approaches. Furthermore, in some areas the introduction of chimneys would not be appropriate and may alter the roofscape introducing further paraphernalia not in keeping with character.

DP17 Farm Buildings, Barns, Old Shops etc

The principle(s) are generally supported. See also our response to DP6.

DP18 Garages and Car Parking

The principle(s) are generally supported. The resistance to 'up and over' garage doors should apply to the Conservation Area only – it is inappropriate and unnecessarily prescriptive to apply within modern development.

DP19 Highways and Footpaths:

The principle(s) are generally supported. However, we would welcome evidence that the current network does not lend itself to community cohesion and the identification of specific areas where the network strengthened.

While the preference for granite within the Conservation Area is noted, for those areas outside of the Conservation Area, the materials should reflect those required for safety.

DP20 Rights of Way

The principle(s) are generally supported.

DP21 Utilities:

The principle(s) are generally supported.

DP22 Street Lighting, Street Furniture, Shopfronts, Advertising and Road Signage

This principle encompasses a range of 'public realm' considerations. It is not appropriate to apply the principles of the Conservation Area to the whole of Zone 1. Zone 1, as currently drawn, includes a variety of modern developments in addition to some mid-20th Century housing to the south (The Beeches). Across Zone 1, including within the Conservation Area itself, there are a variety of different lighting options which have not been fully assessed.

Other matters are generally supported in principle, and the inclusion of Street Furniture in Cast Iron (at appropriate junctures / within the Conservation Area) is considered an appropriate 'nod' to the area's history and Iron Foundry.

DP23 Amenities:

The principle(s) are generally supported.

DP24 Conservation of the Environment:

The principle(s) are generally supported.

DP25 Future Development:

Comments on future development have been covered elsewhere in this response.

4.0 RECOMENDATIONS AND REQUESTS

In general, the DVDS is a good starting point for developing bespoke design guidance that is relevant and fit for purpose. However, in its current draft form this purpose is not achieved. As indicated above there are significant concerns with the justification and the way that Zone 1 has been drawn, which results in the objections we have raised.

It is our view that Zone 1 has been drawn too widely, inappropriately pulling in modern developments and current permitted development sites. This makes it challenging to apply the principles (DP1-DP25) effectively without artificially dictating what are clearly architectural preferences and imposing additional financial burdens on development. This is at odds with the guidance for the preparation of SPDs, which explicitly prohibits the imposition of additional financial burdens. Where the DVDS provides explicit guidance for Zone 1, the other three zones amount to a description of what is there currently without appropriate clarity on what may be appropriate as part of future development. A journey around Deanshanger is effectively a journey through the many development styles and approaches that have been prevalent since the 1800s and through the intervening periods. Aside a couple of brief mentions, the DVDS ignores the industrial heritage and most of the village. Instead, it focuses primarily on this historic core as the primary design influence for any new development.

It is notable that many of the principles as applied to Zone 1 are drafted specifically for buildings and areas of historic interest e.g. within the Conservation Area. As currently proposed, the DVDS effectively seeks to apply restrictions, admirably applicable to the Conservation Area, beyond the limits of its appropriately assessed and defined extent without the necessary heritage assessment and justification to support such an approach. The wider application of these principles would undermine the importance and true value of the buildings in the Conservation Area resulting in the imposition of narrow architectural preferences and stifling opportunities to encourage new, innovative or high-quality designs that could be subservient and sympathetic to these historical areas. Deanshanger's character is a product of individuality and innovation over many years. The continuation of this should not be prevented in forming a positive future for the village.

The former Elementis site is a consented development site with extant planning permission. It is not included within the Conservation Area nor does it have any direct connection with or make a significant contribution to its character and appearance. It is bounded to the north, west and east by modern development and it was a planning requirement that this development respected its proximity to the new development in these areas. As such, it is considered inappropriate and beyond the remit of a VDS to seek to extend the influence of the properly assessed and statutorily designated Conservation Area to include this site. For the stated reasons it is our view the former Elementis site sits more appropriately within Zone 4. We would recommend the revision of Zone 1 to only cover the designated Conservation Area and buildings of true historic value, and the other suggested amendments be made to the DVDS to ensure against inappropriate consequences, compliance with the guidance in the PPG for the preparation of SPDs and to ensure the DVDS is able to properly deliver practical and useful design guidance to secure the maintenance of design quality within the existing developed areas and to constructively and usefully inform new development within the village.