

WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

16th March 2022

Rebecca Breese – Planning, Built Environment and Rural Affairs

Report Title	Article 4(1) Directions for conservation areas in Flore, Weedon, Everdon, Little Everdon, Kilsby, Pitsford, Staverton and Welford.
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List of Appendices

Appendix A – Responses to 2020 consultation

Appendix B – Responses to 2021 consultation

1. Purpose of Report

To consider the responses to the consultation exercise on the draft Article 4(1) Directions for conservation areas at Flore, Weedon, Everdon, Little Everdon, Kilsby, Pitsford, Staverton and Welford and implement the outcomes.

2. Executive Summary

- 1.1. The report sets out the recommendations for Article 4(1) Directions in the conservation areas at Flore, Weedon, Everdon, Little Everdon, Kilsby, Pitsford, Staverton and Welford. It includes details of how the statutory consultation was undertaken, the results of the consultation and the proposed resulting actions (Appendices A and B).

3. Recommendations

3.1 It is recommended that the Cabinet:

- a) Confirms the Article 4(1) Directions for the conservation areas at Flore, Weedon, Little Everdon, Everdon, Staverton, Welford, Pitsford and Kilsby as amended with the changes set out in appendices A and B.

4. Reason for Recommendations

- 4.1 The proposals accord with legislation and the Council's planning policies.
- 4.2 The proposals will provide the Council with the tools to preserve and enhance the heritage of Flore, Weedon, Everdon, Little Everdon, Kilsby, Pitsford, Staverton and Welford, which contribute to the historic character of the West Northamptonshire area. Without these tools the special historic interest of the village may be harmed or lost.
- 4.3 The proposals are consistent with previous decisions made to confirm Article 4(1) Directions in other conservation areas.

5. Report Background

- 5.1 Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local authorities to review existing conservation areas and make new designations from time to time. West Northamptonshire Council is in the process of undertaking reviews of its existing conservation areas, including in the former Daventry District geographic area, and designating new conservation areas where appropriate. Conservation areas are designated to protect local heritage, and certain permitted development rights are removed within conservation areas to facilitate this objective. However, not all permitted development rights are removed through designation.
- 5.2 Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended makes provision for Local Planning Authorities to issue Directions to remove specific permitted development rights, known as "Article 4 Directions". Typically, these are used as a planning tool to protect the character and appearance of conservation areas.
- 5.3 As each conservation area appraisal has been prepared, potential candidates for article 4 directions have been identified. These candidates have been consulted upon as part of the consultation on the appraisal, this enabled the public to have an early opportunity to become more familiar with article 4 directions and the specific proposals identified through the appraisals. Any comments on these proposals have been formally reported to and considered by the former Daventry District Council (DDC).

- 5.4 In the case of the article 4s the subject of this report, DDC's Strategy Group considered reports on the conservation area appraisal consultations and then, at its meeting on 10th September 2020, and 28th May 2020 in the case of Welford, resolved to further consult on the proposed article 4 directions.
- 5.5 The grouping which is the subject of this report was first consulted on in September-November 2020, following an initial tranche of Directions confirmed in February 2020.
- 5.6 In order to be put in force in perpetuity, the directions were required to be confirmed by council by 12th September 2021. Unfortunately, this deadline was not met, and so a decision was made by Cabinet on 14th September 2021 to hold a second consultation.
- 5.7 This second consultation was undertaken between 28th September and 9th November 2021, and is now complete. They were made with immediate effect, and as such in order to remain in force, the directions are required to be confirmed by council by Tuesday 29th March 2022.

6. Issues and Choices

- 6.1 Alongside conservation area status and an adopted Appraisal and Management Plan, article 4 directions help to protect local heritage. In particular, the directions allow further consideration to be given on a case-by-case basis to types of development otherwise permitted in conservation areas. Over time, the incremental effect of these types of development can be potentially harmful, and as such, erode the special interest of our conservation areas.
- 6.2 The alternative options would be not to 'confirm' the article 4(1) directions, thus allowing incremental changes to take place without appropriate monitoring.
- 6.3 Not 'confirming' the proposed Article 4(1) Direction would leave the Council without valuable tools with which to protect and enhance the special architectural and historic interest of this village.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Confirming Article 4 directions would have no material financial effects. Minor costs for sending out communications will be covered from existing budgets.

7.2 Legal

- 7.2.1 Confirming the Directions would support the preservation and enhancement of conservations areas through the planning system in West Northamptonshire, as part

of the provisions set out in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

7.3 Risk

7.3.1 There are no material risks foreseen in the confirming of the Article 4(1) Directions.

7.3.2 Not endorsing the confirmation of the Article 4(1) Directions would be likely to weaken protection for heritage in the conservation areas and thus increase the risk of loss of special interest.

7.4 Consultation

7.4.1 The proposed Article 4 Directions for Weedon Bec, Flore, Everdon, Little Everdon, Staverton, Kilsby, Welford and Pitsford have been subject to two formal consultation periods, the first beginning at 10am Monday 28th September 2020 and concluding at 5pm Monday 9th November 2020, and the second beginning at 10am Tuesday 28th September 2021 and concluding at midnight Tuesday 9th November 2021.

7.4.2 Statutory consultation regulations, as set out in Schedule 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, were complied with constituting:

- Local advertisement
- Site displays in no fewer than two locations within the area to which the direction relates
- Serving notice on the owner and occupier of every part of the land to which the direction relates
- Notifying the County Council
- Notifying the Secretary of State

7.4.3 The former Daventry District Council also informed the relevant Parish Councils and ward members. It is normal practise to have hard copies available at specified deposit points, however, because of the pandemic, this facility was not made available in the first consultation, instead, the Council posted hard copies free of charge on request. During the second consultation, hard copy deposits were made at the library in Daventry and the WNC offices on Lodge Road. Postal hard copies were also available free of charge.

Responses to the 2020 Consultation

The responses to the consultation are set out at Appendix A.

7.4.4 19 responses to the 2020 consultation were received.

7.4.5 Weedon Parish Council submitted an objection to the Direction in Weedon. Everdon Parish Council submitted their support for the Directions in Everdon and Little Everdon.

7.4.6 Several residents expressed objections to the proposals in Weedon Bec.

One respondent from Weedon has suggested the addition of Crown Cottage to the Direction, which was not included as it was thought to be listed alongside its neighbour. In this instance, it is considered that removing permitted development rights would be in line with the approach taken in the rest of the conservation area. Adding this property to the Direction would require another consultation in the same manner as that which has already taken place. This would delay the confirmation of the Direction, and so it will be more effective to make a new Direction for Crown Cottage, removing the same permitted development rights. This would be subject to a separate report to committee.

7.4.7 One resident in Flore suggested extending the Article 4 Direction to cover domestic lighting, however this is not controlled through the planning system.

7.4.8 One respondent from Welford raised the issue that the slate roofing for which the property had been included in the Direction is no longer in situ. As such, it is recommended that it be removed from the Direction for Welford.

7.4.9 One resident of Pitsford identified a minor typographical error in the Direction. This minor error also appears in some of the other Directions, this will be corrected in the final versions.

7.4.10 Several respondents requested further information relating to the process of submitting a planning application, and what timescales and fees would apply.

7.4.11 The responses from the Ministry of Housing, Communities and Local Government did not request any changes.

7.4.12 Historic England did not request any changes.

Responses to the 2021 Consultation

7.4.13 There were five responses to the 2021 consultation. Full comments and officer responses can be viewed at appendix B.

7.4.14 One respondent requested that No.44a High Street be removed from the Flore direction, as it is a granny flat annexed to No.44 High Street, which is already covered by the direction. It is not usually the policy of the Council to place heritage directions on flats, and coupled with the fact that it is annexed to No.44, which is included within the direction, it is suggested No.44a be removed from the direction.

7.4.15 A respondent from Little Everdon requested more information on why three properties in the conservation area were covered by the direction.

7.4.16 A respondent identified that one address in the Pitsford direction, which was included on the map of the properties covered in the direction, was not listed in the address schedule. This typographical error will be rectified in the final document.

7.4.17 One respondent objected to the Weedon direction, and one respondent objected to the Welford direction.

7.4.18 The response from the Department for Levelling Up, Housing and Communities did not request and changes.

7.4.19 Historic England did not request any changes.

7.5 **Suggested modifications**

7.5.1 If the Council decides it wishes to confirm the Directions, it will need to decide if it wishes to amend any of the Orders. In response to the representations received, the following potential amendments to the orders have been identified:

7.5.2 For the Directions relating to Weedon Bec, Flore, Everdon, Little Everdon, Kilsby and Pitsford:

- In the first paragraph of Schedule One of the direction replace 'of' with 'or' as follows:

"The enlargement, improvement or other alteration of a dwelling house, where any part of the enlargement, improvement or alteration ...".

7.5.3 In addition for the direction relating to Pitsford;

- In schedule 2 clarification is required to state that Pitsford House East and South are included within the Direction, as follows:

'Pitsford House (East and South)'

- In schedule 2 clarification is required to state that Middlesex Cottage is included within the Direction, as follows:

Add new text page 2, paragraph 2: "**High Street** Middlesex House, Middlesex Cottage"

- In schedule 2 clarification is required to state that No.4 Manor Road is included within the direction, as follows:

Add new text page 2, paragraph 2: "**Manor Road** No.4"

7.5.4 For the Direction relating to Welford;

- Remove No.1 The Square, Welford from Schedule 2 of the Article 4(1) Direction, as follows:

"The Square ~~1 The Square~~"

7.5.5 For the direction relating to Flore;

- Remove No.44a High Street from the direction, as follows:

Remove text as follows, page 2 of Flore direction, paragraph 4:

“High Street

Nos. 2, 4, 6, 8, 10, 12, 25, 28, 34, 36, 42, ~~44a~~”

7.5.6 If the orders (amended or otherwise) are confirmed by Council, notice of the date of confirmation must be sent to affected owners and occupiers, and a copy of the direction sent to the Secretary of State. The direction would then come into force in perpetuity.

7.5.7 The alternative approaches would be to not confirm the directions, or to confirm some but not others.

7.6 Consideration by Overview and Scrutiny

7.6.1 Include any comments received by the Overview and Scrutiny Committee in relation to this report and its recommendations, and any prior consideration of the issues raised, including date/s of meetings where considered.

7.7 Climate Impact

7.7.1 The confirmation of the directions is unlikely to have a negative impact on the climate.

7.8 Community Impact

7.7.1 It is unlikely that the confirmation of these directions would have any material effect on crime or disorder.

7.7.2 The proposed course of action should not have any perceptible differential impact on people with protected characteristics.

7.7.3 Confirming the directions would assist in conserving the historic character of the villages and contribute to preserving the character of places which make up West Northamptonshire. As such, it would support the well-being of residents and those who work in or visit these conservation areas and the wider area.

8. Background Papers

Department of Communities and Local Government (2019) National Planning Policy Framework

Planning (Listed Building and Conservation Areas) Act 1990

The Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) Regulations 2020

General Permitted Development (England) (Order) 2015

Daventry District Council Strategy Group Report 10th September 2020

West Northamptonshire Council Cabinet Report 12th September 2021

Appendix A – Responses to consultation 2020

Respondent	Comment	Suggested Response	Suggested Action
All of the Article 4s			
Ministry of Housing, Communities and Local Government	I refer to your email dated 28th September 2020 notifying the Secretary of State that the above-mentioned Direction has been made with immediate effect. You are reminded to advise the Secretary of State about confirmation of the Direction in those circumstances as set out in the regulations. It would also be helpful to know if the Council decides in due course not to confirm the Direction.	Comments noted. The Directions are in fact non-immediate, which has been clarified.	No change.
S. Patience (Anglian Water)	Thank you for the opportunity to comment on the Article 4 directions relating to existing Conservation Areas. As these relate to limiting the enlargement or extension of existing dwellinghouses we have no comments to make in respect of these consultations.	Comments noted.	No change.
Everdon and Little Everdon			
Everdon Parish Council	We considered the article 4 directions at out meeting yesterday and were generally in favour of it.	Comments welcomed.	No change.
Flore			
Fiona Miller (Flore)	Could you direction please consider. Installation of Solar Lighting , cheap to	Thank you for your comments. Unfortunately, the installation of domestic lighting is not controlled by	No change.

Respondent	Comment	Suggested Response	Suggested Action
	<p>purchase, simple to install, free to operate- permanently throughout the year! Coloured flashing fairy lights all around the garden, censor controlled, instant blinding floodlights. Light pollution that spoils the village atmosphere and inappropriate, out of season in conservation areas.</p>	<p>the planning system and so there are no permitted development rights to be removed.</p> <p>Installation would only be controlled on listed buildings through listed building consent. For further information, please contact the Development Control department- planning.ddc@westnorthants.gov.uk.</p>	
Pitsford			
P Farrell, Berrys (Pitsford)	<p>I am writing to you on behalf of Dr Krishna Kodavali, the proprietor of Toll Bar Cottage as part of the above consultation.</p> <p>Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities to review Conservation Areas “...from time to time” – it is acknowledged that Daventry District Council are currently undergoing this process.</p> <p>The 2018 Settlements and Countryside Local Plan (Part 2) for Daventry District Heritage Background Paper Version 2 (HER01) sets out an action plan for the future management of the historic environment of the district which includes a review of each Conservation Area and “non-designated assets that make a</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p data-bbox="465 277 1043 387">positive contribution to the conservation area are assessed against criteria to form the basis of a local list.”</p> <p data-bbox="465 437 1043 778">This has been implemented as part of the Pitsford Village Conservation Area Appraisal and Management Plan (Consulation Draft 2018) which identifies several buildings outside the Conservation Area that both: - Contribute to the character and appearance of the Pitsford Village Conservation Area - Potential candidates for the local list</p> <p data-bbox="465 829 1043 1369">This has resulted in the decision to apply an Article 4(1) of the of the Town and Country Planning (General Permitted Development) Order 1995 to Toll Bar Cottage. At present, Daventry District Council have criteria set out below to assess local list candidates:</p> <ul data-bbox="465 1106 1043 1369" style="list-style-type: none"> <li data-bbox="465 1106 1043 1139">• • The age of the building <li data-bbox="465 1139 1043 1173">• • Its condition and/or completeness <li data-bbox="465 1173 1043 1249">• • The design character and architectural merit <li data-bbox="465 1249 1043 1283">• • The use of materials <li data-bbox="465 1283 1043 1316">• • Its scenic value <li data-bbox="465 1316 1043 1369">• • Access 	<p data-bbox="1066 437 1778 470">Comments noted.</p> <p data-bbox="1066 829 1778 863">Comments noted.</p>	<p data-bbox="1800 437 2033 470">No change.</p> <p data-bbox="1800 829 2033 863">No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<ul style="list-style-type: none"> • • Viability • • Historic Association <p>There is a “short justification for their inclusion” in the Conservation Area Appraisal and Management Plan (below) and no assessment of Toll Bar Cottage against this criterion. Additionally, there is no evidence of how this criterion has been formed. It is suggested that there should be full transparency in this process which has subsequently resulted in the justification of restricting permitted development rights. Harborough Road Toll Bar Cottage – historic property which collected tolls for the turnpike.</p> <p>Historic England’s Advice Note 7 on Local Heritage Listing continually states the need for community engagement in the development of selection criteria. The degree of consultation will increase the weight in preserving the significance of the buildings that are then ratified on the local list.</p> <p>“Local Lists will be more effective if supported by objective criteria and both</p>	<p>An assessment of Toll Bar Cottage was undertaken against the criteria for inclusion on the local list which has been adopted by the District Council. The criteria were produced by the Council, building on work undertaken by the Rockingham Forest Trust using best practice guidance including Historic England’s Advice Note 7 on Local Heritage Listing. Heritage assets are assessed using an assessment form, which can be viewed on the web.</p> <p>In consulting on the Pitsford Conservation Area Appraisal, an initial exhibition was held prior to formal consultation in the Pitsford Village Hall, where information regarding the Local List was publicised. The Local List was then formally consulted on in the Draft Pitsford Conservation Area Appraisal and Management Plan (2018) (and subsequently the information was again available through a second consultation which focussed on a further proposed extension to the conservation area boundary). It is not the Council’s policy to inform individuals via post of the conservation area proposals, instead the review is publicised using digital methods, including the Council’s website, the Parish Council’s website and</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>criteria and content have been tested through public consultation.”</p> <p>The Appraisal and Management Plan contains initial proposals for an Article 4(1) Direction, which the Council state will “remove permitted development rights that relate to matters of particular importance to the character of the [conservation] area.”</p> <p>Again, there is no assessment other than the description above as to how Toll Bar Cottage contributes to the setting of the Conservation Area and therefore its development managed by removal of permitted development rights.</p> <p>Although the Council may be of the opinion there has already been some early consultation as part of the Conservation Area review process, Toll Bar Cottage sits one mile outside the Conservation Area, undoubtedly away from the Pitsford settlement in the open countryside. The review did not include the extension of the Conservation Area boundary this far and there has been no separate consultation for buildings to be included on the local list. Therefore this direct contact from Daventry District Council is the first awareness the</p>	<p>local social media channels, the posting of posters in the area and press releases.</p>	

Respondent	Comment	Suggested Response	Suggested Action
	<p>owners have of their home being considered as a building on the local list and subject to an Article 4(1) Direction, irrespective of the latter this would be a material consideration to any future development plans.</p> <p>The National Planning Policy Framework cites that "...the use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area."</p> <p>It is not clear that an Article 4(1) on the isolated Toll Bar Cottage, located outside of the Conservation Area, for which no full assessment or explanation has been set out as to its inclusion on the local list is warranted to protect the local amenity. We would ask that the Council share its decision making process which has concluded in Toll Bar Cottage on the local list and contributing to the setting of the Pitsford Village Conservation Area, resulting in imposing an Article 4(1) Direction.</p>	<p>Article 4 Directions are being proposed for assets on the Local List to protect their historic or architectural interest, and Toll Bar Cottage has been assessed against the adopted criteria and met the threshold for inclusion. Although candidates for the Local List are being explored through the conservation area appraisal process, assets do not need to be within the conservation area to merit being included on the Local List. Extending the conservation area to Toll Bar Cottage was not considered to be an effective way of managing development, whereas Local Listing and the use of Article 4 Directions is an appropriate method. The assessment form which sets out the criteria and scoring for Toll Bar Cottage can be made available,</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
		however it is not current practice to publish all assessment forms.	
Mr and Mrs Cebak	<p>We are the owners of Gardeners Cottage and we oppose it being subjected to an Article 4 Direction.</p> <p>We do not agree that Gardeners Cottage merits any special consideration and have previously stated this during the “Pitsford Conservation Area Appraisal and Management Plan Consultation”.</p> <p>Government planning guidance states that an Article 4 directive should only be used in those exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic environment or the proper planning of the area.</p> <p>We do not believe Gardeners Cottage meets these exceptional circumstances for several reasons:-</p> <ul style="list-style-type: none"> • The property lies well outside the village conservation area. 	<p>Comments noted.</p> <p>Comments noted.</p> <p>In this circumstance, Gardener’s Cottage was identified through the Pitsford Conservation Area Appraisal (2019) and added to the (former) Daventry District Council Local List. Article 4 Directions are used to protect the historic environment both within conservation areas, and outside conservation areas where dealing with assets which are identified as locally special.</p> <p>Article 4 Directions can be used to restrict permitted development rights to protect the historic environment, including for assets on a Local List. Paragraph 13 of Historic England’s Local Heritage Listing Advice Note 7 states “Where changes do not require planning permission, an authority may</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<ul style="list-style-type: none"> <li data-bbox="517 676 1025 938">• The property is not prominent and is not accessible to the general public or visible from any public areas. It is situated at the end of a long private drive to which the general public have no right of way or access. <li data-bbox="517 1070 1039 1332">• The property is surrounded by modern newly built houses, some of which have only recently been granted planning permission. Gardeners Cottage was never afforded any special consideration as part of the planning of this area. 	<p data-bbox="1066 280 1760 584">consider whether the exercise of permitted development rights would undermine the aims for locally listed heritage assets. In cases where it would, authorities may consider the use of an Article 4 Direction (in tandem with the local listing process) to ensure any permitted development is given due consideration.” These measures do not require the asset to be within a conservation area.</p> <p data-bbox="1066 676 1749 740">Having historic significance does not rely on visibility or public access.</p> <p data-bbox="1066 1066 1749 1327">The Article 4 Direction which is suggested may cover Gardener’s Cottage recognises its local importance and would therefore restrict its demolition. The construction of new build properties around Gardener’s Cottage would not necessarily detract from its historic interest, and therefore have been deemed acceptable in planning terms.</p>	<p data-bbox="1800 676 1951 703">No change.</p> <p data-bbox="1800 1066 1951 1093">No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<ul style="list-style-type: none"> <li data-bbox="517 323 1025 352">• The property is not particularly old. <li data-bbox="517 756 1025 1054">• The property has been extensively renovated the last 50 years with none of the original features remaining. These renovations included extending the property by around 40%, raising & replacing the roof and replacing all windows & doors. <li data-bbox="517 1187 1025 1326">• A large area of the original external stonework is no longer visible because it has been rendered over with mortar. 	<p data-bbox="1066 323 1783 699">As was noted at the time of the conservation area appraisal, Gardener’s Cottage is noted on the 1st edition OS mapping as the locally known “Little Pitsford” prior to the later development of Middlesex House on Ride Lane by Pickering Phipps, which dates it to the mid-19th century at the latest, and more likely from its architectural styling it dates to the 18th century. Whilst the age of an asset can play a key role in its significance, it is not the only factor taken into account in assessing candidates for the Local List.</p> <p data-bbox="1066 756 1783 1054">Whilst some alterations may have been made to the property during the 20th century, the overall historic character of the property has been well-maintained, and it has retained its historic agricultural quality. The windows appear to have been replaced with good quality and sensitive casements, including the retention of a limited number of small historic openings and detailing such as lintels and sills.</p> <p data-bbox="1066 1187 1783 1366">Gardener’s Cottage contains architectural interest as part of the local vernacular, as well as historic interest as part of the area on Ride Lane known as “Little Pitsford” which also includes Middlesex House. The property has been visited to assess any changes which</p>	<p data-bbox="1805 323 1951 352">No change.</p> <p data-bbox="1805 756 1951 785">No change.</p> <p data-bbox="1805 1187 1951 1216">No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<ul style="list-style-type: none"> <li data-bbox="517 555 1032 676">• The property is not exceptional and has no special historical connection to the village. <li data-bbox="517 868 1032 1257">• The property is one of several similar properties in the village and so it is not unique. The majority of these properties lie within the protected conservation area. It would seem unreasonable therefore to apply directives to the few properties of this type that lie outside the conservation area. 	<p data-bbox="1066 280 1783 507">have been made and it was noted that the principal elevation (that which fronts onto Ride Lane) has not been rendered and does not appear to have been altered since the direction was proposed. See comments above relating to historic development of Gardener's Cottage.</p> <p data-bbox="1066 555 1783 778">Gardener's Cottage is indeed representative of vernacular character in the nearby conservation area, as well as contributing to the character of Ride Lane. Demolition is already controlled within the conservation area, which is the primary objective of the Article 4 Direction relating to Gardener's Cottage.</p> <p data-bbox="1066 868 1783 938">See response above relating to Local List assets outside of conservation areas.</p>	<p data-bbox="1805 555 1962 587">No change.</p> <p data-bbox="1805 868 1962 900">No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>We also oppose the details of the Article 4 Direction which states:-</p> <p>“The Direction applies to development consisting of: The enlargement, improvement of other alteration of a dwelling house, where any part of the enlargement, improvement or alteration would affect the principal elevation”</p> <p>This would appear to remove our permitted development rights to extend our house. We think this is unreasonable and that this detail should be removed from the Direction.</p> <p>We note that this detail was not mentioned during the original “Pitsford Conservation Area Appraisal and Management Plan Consultation”.</p> <p>The original consultation only proposed removing Demolition from the permitted development rights and this is clearly documented in the adopted Pitsford CAAMP (page 44):-</p> <p>“Withdrawn PD Rights - Demolition (Article 4 Direction outside the Conservation Area) - Gardener Cottage, Ride Ln”.</p>	<p>Under the Article 4 Direction extensions would only be restricted on elevations which front a highway. The only elevation of Gardener’s Cottage which fronts a highway is arguably its principal elevation, and extensions from this elevation are already restricted through the provisions of the General Permitted Development (England) Order 2015. Hence the Article 4 Direction does not further restrict permitted development rights in this case. The Article 4 Direction primarily seeks to preserve Gardener’s Cottage as an asset and therefore restricts permitted development rights relating to its demolition.</p>	<p>No change.</p>
<p>R. Crichton (Pitsford)</p>	<p>Thank you for your letter of 28 September 2020 advising my and I as owners of</p>	<p>Comments noted.</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Pitsford House West of the making of the above Direction in respect of our property. On behalf of my wife and myself I wish to make the following representations in respect of the Direction:-</p> <ol style="list-style-type: none"> 1. The drafting of Schedule One appears to be defective in that the wording "improvement of other alteration" is nonsensical and presumably as the Direction is executed under seal it will require to be formally amended. 2. The Direction appears to apply blanket restrictions in respect of General Permitted Development Rights with regard to all of the properties identified in Schedule Two of the Direction. This is in direct conflict with the representations and assurances set out by the Council during its consultation in connection with its proposed revisions to the Pitsford Conservation Area and in the adopted Pitsford Village 	<ol style="list-style-type: none"> 1. Thank you for bringing this to our attention. This typographical error will be amended in the final Direction. 2. Only development comprised within Class A of Part 1 of Schedule 2 to the Order (General Permitted Development) (England) 2015 is restricted. The alteration or replacement of windows is contained within this Class as the alteration of a dwellinghouse which would affect a principal elevation or elevation which fronts a highway, waterway or open space. The wording of the Direction refers specifically to the provisions of the Order itself, and the wording cannot be altered. The conservation area appraisal provides guidance relating to what kinds of development may be harmful, in 	<p>Page 1, Schedule 1, paragraph 1 "...improvement orf other alteration..."</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Conservation Area and Management Plan 2019 (“the Plan). In the Plan the Council states that “as part of the appraisal the removal of certain permitted development rights are then identified in the Plan on a property by property basis. In the case of Pitsford House West the proposals extend to windows and doors but the limited measures set out in the Plan are not applied in the Direction.</p> <p>3. There is obviously a close correlation between local listing and article 4 Directions and the blanket and extensive nature of the Direction seems to go against the spirit of the assurance given by the Council in the Plan that “local listing does not impose further inherent planning controls but provides weight for their retention in planning decisions should the asset</p>	<p>this case being the replacement of windows and doors.</p> <p>3. It is correct to say that Local Listing does not bring with it inherent planning controls, as it is not a statutory list. The proposals for Article 4 Directions relating to local list candidates were not hidden. The conservation area appraisal also clearly sets out the proposals for Article 4 Directions in section 9.1 which details the proposed restricted rights and the associated locations.</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>in question become subject to development proposals". Blanket restrictions in the form set out in the Direction are effectively a form of statutory listing.</p> <p>4. In the plan the main structure of what was formerly Pitsford House is identified as a key building in Figure 10 and presumably that structure is now subject to local listing. However the map attached to the Direction and published on your website excludes a significant portion of that building despite the fact that it is an integral part of the structure sharing the same architectural features as much of the remainder of Pitsford House. Schedule Two of the Direction includes Pitsford House West and Pitsford House but the Article 4 proposals set out in the Plan make no reference to Pitsford House in its entirety. All of this points to a fundamental inconsistency in the</p>	<p>4. The Pitsford Conservation Area Appraisal (2019) does refer to the entirety of Pitsford House (East, West and South) in its proposals for Article 4 Directions at section 9.1. Schedule 2 of the Direction makes reference to Pitsford House and Pitsford House West. Pitsford House should be followed by "(East and South)" and this will be amended in the final Direction. The polygon on the map covers the entirety of Pitsford House (West, East and South), and the owners/occupiers of each were notified of the proposed Direction via post.</p>	<p>Pitsford Article 4 Direction, page 2, Schedule 2, add text: "<u>Pitsford House (East and South)</u>"</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Councils appraisal and a lack of clarity in relation to the application of the Direction which needs to be addressed.</p> <p>5. In the Plan the owners of the relevant properties are assured by the Council that “the making of Article 4 Directions is a separate process which will follow the conservation area appraisal requiring focussed consultation with the properties concerned”. My recollection is that this reassuring message was also relayed by the Council at its presentation in Pitsford Village Hall on 20 November 2018. I believe that the Council should have consulted individual owners before making a Direction in order to explain more about its proposals in advance of taking statutory measures. In my view the making of a Direction imposing blanket changes and</p>	<p>5. The proposals were introduced through the conservation area appraisal (2018-19), at which time information was requested from a number of residents relating to Article 4 Directions. The Council duly provided advice to those who had queries. The advice at the time was that there would be a separate consultation, which has now been undertaken. This consultation provides an opportunity for residents to view the proposals again (which have not changed since their first introduction in the conservation area appraisal) to ask questions and formally provide comments which can then be presented to Council through a transparent process. The Directions have not yet been brought into force, which, if confirmed, will not occur until 28th September 2021.</p> <p>The six week timescale given is over and above the statutory limit set out in the General Permitted Development Order 2015. It is</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>simply seeking representations within a strict time limit does not represent a meaningful attempt to consult.</p> <p>6. My concerns about the process adopted by the Council are strengthened by the Q & A's provided with the notification. There is no explanation as to why the Council has sought to pass legislation in advance of the promised consultation and why it has apparently made a Direction in terms which do not accord with The Plan. There is no information provided in relation to the process for dealing with representations.</p> <p>Finally I wish to question why the Council thought that this matter was of such importance and urgency that it decided to embark on the process in the midst of an unprecedented and worsening national emergency. The current circumstances could clearly make engagement and</p>	<p>appreciated that residents take the time to provide comments.</p> <p>6. As noted above, the consultation has taken place and provided the opportunity to seek information and provide formal comments. The proposals in the Direction have not been altered from those within the conservation area appraisal. Please see comments above.</p> <p>It is understood that this consultation has been undertaken during unprecedented circumstances, however it is also not possible to put all work on hold indefinitely. The Council has fulfilled all statutory requirements for this consultation as well as increasing the time limit for comments from the</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	discussion much more problematic for those involved some of whom may be facing difficult issues because of the pandemic.	statutory level, and more responses have been received compared to previous Article 4 consultations.	
Staverton			
Patricia Brown	<p>May I ask on what criteria you've categorised various properties in the village and left out swathes of other properties? I'm aware of our illustrious PM's mandate to build 'til we drop but I do not see why villagers in the same village should be left out as prey for developers. Our meagre, so called amenities are shared by all, but obviously some properties will benefit from a ring fence security to protect them from any future development either on their adjoined land or neighbours land etc. I find this offensive.</p>	<p>An Article (4)1 Direction is a common planning tool used in conservation areas. Not all types of development within a conservation area require planning permission. An Article 4(1) Direction removes permitted development rights for particular types of development and brings in a requirement for planning permission to be sought before that development takes place. The purpose is not to prevent development from taking place but to ensure that it is managed so that individual buildings and the conservation area retain their historic character. They are generally placed on buildings which have retained traditional features and materials, or where the placement of an Article 4 Direction is expedient to preserving the wider character of the area. The buildings included in the Staverton Article 4(1) Direction were identified as retaining particular traditional features during fieldwork undertaken in 2019/2020 as part of the wider review of the conservation area. Some historic buildings in Staverton are not included in the Article 4(1) Direction because they have listed building status, meaning that there are already planning controls in place.</p>	No change.

Respondent	Comment	Suggested Response	Suggested Action
	<p>I would appreciate your comments regarding future plans regarding this so called conservation programme and what ring-fence tenure is offered for inclusion.</p> <p>Having watched and in some instances been active against the dire planning approvals taken by Daventry DC and town council regarding housing developments, schooling etc in Daventry over several years, and following legal advice, I now seek written confirmation to protect all that I hold dear, both for my family and fellow villagers of Staverton.</p> <p>As you know we live in turbulent times and to that end a good fighting stance is required to prevent a swallowing up of our countryside, so having exposed areas is not</p>	<p>The Staverton Conservation Area Article 4(1) Direction would remove permitted development rights for the following: The enlargement, improvement or other alteration of a dwelling house, where any part of the enlargement, improvement or alteration would affect the principal elevation or any elevation that fronts a highway, waterway or open space; Any alteration or addition to the roof of a dwelling house. For example, this could include works such as changes to windows, doors, roofing materials, addition of skylights etc.</p> <p>Proposed development in areas of open land would most likely require planning permission and if so would be subject to the policies in the National Planning Policy Framework the West Northamptonshire Core Strategy and the Settlements and Countryside Local Plan 2020 and. The Staverton Conservation Area Appraisal and Management Plan, as a supplementary planning document, would be a material consideration in determining such planning applications.</p> <p>More information about Article 4(1) Directions can be found here</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>a good defence. We are either a conservation village or we are not. This needs clarification and further explanation before these areas become “loopholes”.</p>	<p>https://www.daventrydc.gov.uk/living/planning-policy/conservation-areas/article-4-directions-and-heritage/</p>	
Weedon			
<p>Ann Ranshaw (Weedon)</p>	<p>We object most strongly to the imposition of Article 4 Directions on our property in Weedon Bec for the following reasons:</p> <p>1 Our house demonstrates quite clearly that Weedon householders respect their traditional older homes and there is no need for additional regulation.</p> <p>Our house was derelict and uninhabitable in the early 1970’s. It has been brought back to life by 3 sets of careful owners who have made internal and external alterations none of which required any sort of planning permission.</p> <p>It has been a reasonably affordable home to 11 people (including 5 young people) throughout 50 years of changes. None of the alterations made have detracted from</p>	<p>Comments noted.</p> <p>1. Article 4 Directions are placed on individual properties where features of value have been identified which contribute to the character of the conservation area or its setting. In the case of properties added to the Local List, these properties make a positive contribution to local heritage, and the setting of the conservation area and therefore an Article 4 Direction is proposed to help preserve that character. There is evidence that a number of properties within the conservation area have had positive features replaced by insensitive alternatives, which has been done without the need for planning permission. It is not possible</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>the traditional feel or look of the property as evidenced by it being placed on the Local List when Conservation Areas were made in Weedon.</p> <p>This history is typical of many older houses in Weedon. There is absolutely no evidence that any of the properties selected for Article 4 Directions is likely to undergo alterations or development that is inappropriate to their setting in the village. There is therefore no justification for the imposition of Article 4 conditions; the legislation is being misused by the District Council.</p> <p>2 We, and the other properties selected, will be disadvantaged by the District Council proposals. We face having to apply for planning permission at a cost of £200+ for minor changes; a fee which other properties in the village of similar age, style and situation, will not incur. We face higher costs for minor changes and replacement because of the more detailed specifications that the District Council are choosing to impose.</p>	<p>to predict what changes may be proposed in the future even if previous development decisions have been sensitive to the historic environment, and an Article 4 Direction allows for closer management of future changes.</p> <p>2. The basic householder planning application fee is £206 (which covers planning applications made as the result of the presence of an Article 4 Direction). Where positive features have been identified which contribute to the character of local heritage, an Article 4 Direction aims to preserve those features, and in turn the local historic environment such as a property on the local list or within a conservation area. If proposals to make changes to positive features constitute like-for-like change they are not likely to require</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Higher cost of replacement is a disincentive to maintaining property in good order and the installation of everyday energy saving measures which the government encourages us to embrace.</p> <p>When we come to sell, buyers will be deterred from buying an older house with a low energy rating if they can do little to improve it.</p> <p>Our property will be less marketable than similar older properties because of the restrictions imposed yet we will not have the market kudos of being a Historic England Listed Building or being situated within a Conservation Area.</p> <p>3 A property opposite us, also earmarked for Article 4 regulation, is already visibly in a poor state of repair. The occupant is in an older person and we have recently become aware that she suffers from acute anxiety. The District Council's proposals have affected her mental health and increased her fears. Like us, it is likely that her home</p>	<p>planning permission. This encourages the retention and repair of features of value, whilst also allowing some control over proposals which seek to make stylistic or material changes through the planning application system. The positive features which the Direction seeks to preserve, such as fenestration, are unlikely to require frequent upgrade, particularly if they are maintained and repaired to a good standard. Maintenance and repair of existing features would not require planning permission.</p> <p>There are many ways in which the energy efficiency of a property can be increased without the need for planning permission, whilst also maintaining a property's character, such as through loft insulation.</p> <p>There is no evidence to suggest that an Article 4 Direction makes properties less marketable.</p> <p>3. As noted above, where development proposals constitute like-for-like development, planning permission is unlikely to be required. Also, there is no evidence that an Article 4 Direction will lower the value of a property.</p> <p>The Council offers grants and small loans to help people with small scale repairs or improvements to make a home more suitable or safer. The provisions</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>is a way of meeting the expenses of old age. We cannot see how it can be right for a District Council to devalue what is to many their most important source of security in later years.</p> <p>4 The regulations are being imposed retrospectively and, while we are invited to respond to this consultation it is evident that the imposition of Article 4 Regulations is virtually done deal as an implementation date is already stated. The District Council has no right to act in this way and it is surely no coincidence that this money-making exercise is being deployed at a time when council coffers are under strain.</p> <p>5 The District Council is discriminating against us and the other 14 properties proposed for Article 4 Directions. There is more than enough regulation under ordinary planning policy that is common to all householders to cover inappropriate alteration.</p>	<p>are subject to qualifying criteria, including a means test, and more information can be found in the Private Sector Housing Assistance Policy. Enquiries should be directed to the Care and Repair Team at the District Council.</p> <p>4. The Council is required by law to state a <i>potential</i> implementation date under the regulations contained in Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015. When Article 4 Directions were first explored and identified in Weedon Bec, there was no charge for planning applications made as the result of the presence of an Article 4 Direction. The fees now charged have only been introduced by central government since their proposal through the conservation area appraisal.</p> <p>5. There is evidence within the conservation area that piecemeal insensitive development has occurred, including the removal of traditional fenestration for example. Within conservation areas and for locally listed buildings, many minor development works remain “permitted development” and an Article 4 Direction is a</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Your proposals are an affront and insult to owners of older properties and show a distrust for ordinary householders by imposing discriminatory regulation as an easy way of making money to support a planning department that does not listen to residents and consistently fails to act to monitor and enforce breaches of ordinary planning regulations.</p>	<p>common tool to allow better management of the historic environment. The properties covered by the proposed Article 4 Direction all retain features of value which contribute to the character and appearance of the conservation area, or to locally listed buildings, hence their individual identification. The proposals are objectively made in order to preserve or enhance the character of the conservation area.</p>	
<p>Fiona Thomas</p>	<p>I have read that DDC plan to impose Article 4 directions on 15 properties in the Weedon Bec.</p> <p>While I am not one of the householders affected, I wish to register my disgust and dismay at these proposals.</p> <p>Why do DDC think the implementation of Article 4 is fair and democratic or even beneficial to the village? On the Historic England website it states the government has issued guidance on how and when Article 4 directions should be considered. It says that local authorities should consider making Article 4 directions only in exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic</p>	<p>Comments noted.</p> <p>Article 4 Directions are a common tool used within conservation areas nationwide, in order to protect the historic environment. There is evidence within Weedon Bec of the piecemeal effects of the exercising of “permitted development rights” such as the replacement of traditional fenestration and doors with inappropriate modern alternatives which gradually erode the historic character and appearance of the area, harming the historic environment in this case. Individual properties have been identified as making a particular positive contribution to the character of the conservation area, or as entries on the local list for the retention of features of value. In these cases, the exercising of “permitted development rights” could</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>environment or the proper planning of the area. Please can you tell me what evidence you have of the 'exceptional circumstances' in Weedon.</p> <p>Repairs will be delayed or even worse ignored, as extra money to pay for the planning permission and potentially different building materials will need to be found and earned. People don't just have £206 sitting around in their bank account. This is essentially 'dead money' a tax, it has to be paid but there is no physical benefit. The current householders (and future ones) bought the house because they loved the character, quirks and charm of their older property. They want to look after and preserve it as it is their home and investment.</p> <p>Article 4 could have a knock on effect to local businesses as jobs won't be booked in so they are earning less.</p>	<p>lead to the loss of these positive features, and further impact on the character of the area.</p> <p>Repairs are not controlled under the planning system as they do not constitute development.¹ The good practice of maintaining and repairing historic buildings commensurate with their significance is encouraged by the Council.</p> <p>In circumstances where development proposes to remove features of positive value and replace them with alternatives which are not sensitive to historic character then planning permission will be required to make changes. This allows some control over works which are carried out, in order to protect and benefit the historic environment.</p> <p>Article 4 Directions do not intend to stop all development from happening, rather to steer development so that it is sensitive to the historic environment. Where proposals preserve or enhance this character and appearance, works are more likely to be given consent.</p>	<p>No change.</p>

¹ Repairs to listed buildings will require listed building consent in most cases.

Respondent	Comment	Suggested Response	Suggested Action
	<p>Article 4 will effect the resale of property. Why would you buy a property that comes with a mandatory price tag and restrictions on renovations. It's hassle without the kudos of a listed building.</p> <p>There is also a mental health aspect. Article 4 has already brought stress and anxiety to householders in the village. You are imposing unplanned expenditure on householders. Many people have been hit financially by Covid -19 restrictions and you are now layering the stress and cost of getting planning permission to do house maintenance and renovations on top of this. Please also consider people find form filling and dealing with planning a very daunting and stressful exercise.</p> <p>In summary, I can't understand why DDC are pushing ahead with this. Where is the evidence that these 15 houses are under threat from random renovations and that Weedon needs this kind of protection?</p>	<p>There is no evidence to suggest that the presence of an Article 4 Direction affects property resale.</p> <p>As noted above, the Council offers grants and small loans to help people with small scale repairs or improvements to make a home more suitable or safer. The provisions are subject to qualifying criteria, including a means test, and more information can be found in the Private Sector Housing Assistance Policy. Enquiries should be directed to the Care and Repair Team at the Council. Assistance and advice for completing planning applications can be sought from the Council's Development Control team.</p> <p>The properties have been identified due to the presence of features of value which have been retained and contribute to the character and appearance of the conservation area or the character of a locally listed property. It is not that they are directly under threat, but that an Article 4 allows the proactive preservation of features of value through the planning process.</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
<p>Catherine and Peter Worth (Weedon)</p>	<p>Further to your letter regarding a very small number of houses being singled out for “Conservation Status” we must add our voice to those that feel this is a step too far.</p> <p>We fully understand the need for conservation areas and also the need to place “ listings or Grades” on houses of an historic or of national interest but the list of 15 houses that come under the proposed Town and County Planning Order 2015 in no way falls within these parameters. The whole idea is ludicrous and unfairly places additional burden upon the owners of the 15 houses so proposed.</p> <p>The property in which we reside is old yes but of historic value no! It is surrounded by old council houses of no beauty at all and these can be altered and decorated in any way whatsoever with no recourse to the aesthetics of the area or the village. They can put in PVC double glazing and doors and assist in all our efforts to reduce climate change but as we and other proposed properties have wooden framed windows and doors we are penalized from</p>	<p>Comments noted.</p> <p>The properties have been identified due to the presence of features of value which have been retained and contribute to the character and appearance of the conservation area or the character of a locally listed property.</p> <p>As noted above, it is the individual properties which have been identified as locally special. Nearby modern development does not detract from the presence of historic features of value, nor reduce the need for their conservation.</p> <p>The presence of an Article 4 Direction does not stop all development occurring, and many changes can be made to a property to increase energy efficiency under government initiatives without the need for planning permission, whilst sustaining historic character. Advice on this has been published by</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>helping to reduce both climate change and our energy consumption.</p> <p>We have always in our lives both in business and private strived to always find the positive in any actions we or others take but we can see no benefit to us or the local community in this proposal at all.</p> <p>As an example of the extra burden to be placed upon us, the District Council or County Council whichever, has a propensity to spray salted grit on the road outside our house and as our frontage is directly onto the road much salt, spray and slush during the winter months comes into contact with the front of our house, which is constructed of Northamptonshire stone, is readily attacked by the salt leading to erosion of</p>	<p>Historic England and is available on their website.² There is evidence to suggest that the use of materials such as uPVC, as compared to modern high-standard wooden alternatives, can increase the levels of carbon dioxide released into the atmosphere over the life cycle of the window or door reducing levels of sustainability and energy efficiency.³</p> <p>Article 4 Directions allow some control over the management of change to the historic environment, and feeding into the proactive strategy for its preservation.</p> <p>Where proposals would constitute maintenance or repair, planning permission would not be necessary as this does not constitute development. The Town and Country Planning (General Permitted Development) (England) Order 2015 stipulates that under Class A- enlargement, improvement or other alteration of a dwellinghouse “Development is permitted by Class A subject to the following conditions- a) the materials used in any exterior work (other than materials used in the construction of a</p>	<p>No change.</p> <p>No change.</p>

² www.historicengland.org.uk

³ <https://www.bwf.org.uk/wp-content/uploads/Life-Cycle-Assessment-Report-1.pdf>

Respondent	Comment	Suggested Response	Suggested Action
	<p>the stone. Now a simple solution to this problem would be to put a cement screed along the front of the house which not “pretty”, but one we must consider soon, to retain the integrity of the building. However if the proposal were to go through we are convinced that any restoration to the outside would have to be in Northamptonshire stone and be at least 20 -30 times more expensive.</p> <p>Please use your very best efforts to stop this madness. Fifteen houses out of the whole village is farcical and seems to be one of those schemes drawn up on the back of a cigarette packet.</p>	<p>conservatory) must be of similar appearance to those used in the construction of the exterior of the existing dwellinghouse;”⁴ Hence, any works to the exterior of the building are already required to be of similar appearance, regardless of the presence of an Article 4 Direction.</p> <p>The comments regarding the activities of salt spreading on the highway have been passed on to colleagues in the highways team.</p> <p>Comments noted.</p>	<p>No change.</p>
<p>Anthony McCrae</p>	<p>I think the DDC is acting in an unfair way. It is not resonable to demand a fee from one party & not from another when both are making similar requests. From a personal point of view I am not too concerned about what ever DDC decide.</p> <p>I have no intention to make any changes to 1 South Street & I have no intention to sell the property I will move when nature decides.</p>	<p>Article 4 Directions are placed only on individual properties, rather than a blanket approach, based on the identification of features of value which contribute to the character of the conservation area and subsequently merit preservation. Hence, not all properties within a conservation will necessarily be identified to be covered by the Direction.</p>	<p>No change.</p>

⁴ Paragraph A.3, Schedule 2, Part 1, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015.

Respondent	Comment	Suggested Response	Suggested Action
Mrs E. Barwood	<p>I refer to your correspondence of 25th September 2020 informing me that Daventry District Council has made a Direction under Article 4(1) for properties in the Weedon Bec. I own two of these properties (No 67 (Jakeman's Cottage) and Pump Cottage on Queen Street) and rent them out to tenants.</p> <p>I am strongly against this Direction and believe it to be against the interests of individual property owners, owner occupiers, tenants and the community as a whole. My objections are that the Direction is inappropriate both in content and timing.</p> <p>Specifically, the Direction is inappropriate because:</p> <ul style="list-style-type: none"> • It will increase the costs of home improvements for hardworking families in the area, as they would now have to submit planning applications (supply drawings and specifications, use special materials 	<p>Comments noted.</p> <p>Comments noted.</p> <p>Where proposed development works preserve the character of existing features through like for like development, there is usually no need for planning permission. Where works are necessary to make a home more suitable or safer and residents require financial assistance, the Council offers grants and small loans to help people with small scale repairs or improvements. The provisions are subject to qualifying criteria, including a means test, and more</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>and pay fees). This seems particularly inappropriate as we are entering a Covid-19 induced recession when many families are facing a drop in income and unemployment.</p> <ul style="list-style-type: none"> It will provide a disincentive to improve and maintain properties in the area because the cost of doing so will become greater. This could lead to a deterioration in the appearance of buildings in the area and a reduction in the value of house prices in Weedon. 	<p>information can be found in the Private Sector Housing Assistance Policy. Enquiries should be directed to the Care and Repair Team at the Council.</p> <p>Repairs are not controlled under the planning system as they do not constitute development.⁵ The good practice of maintaining and repairing historic buildings commensurate with their significance is encouraged by the Council. Historic materials, such as timber windows and doors are far easier to maintain and repair, as opposed to modern alternatives such as composite or uPVC which require wholesale replacement and have a generally shorter life expectancy.⁶ Advice on the maintenance and repair of historic features can be found on Historic England's website.⁷</p> <p>In circumstances where development proposes to remove features of positive value and replace them with alternatives which are not sensitive to historic character then planning permission will be required to</p>	<p>No change.</p>

⁵ Repairs to listed buildings will require listed building consent in most cases.

⁶ <https://www.bwf.org.uk/wp-content/uploads/Life-Cycle-Assessment-Report-1.pdf>

⁷ www.historicengland.org.uk

Respondent	Comment	Suggested Response	Suggested Action
	<ul style="list-style-type: none"> • It will lead to a fall in the value of properties to which this Direction is applied. Research shows that investors have stopped buying C3 properties in the hope of achieving C4 status. The proposed change to properties in Weedon will dampen the value of property there. Inevitably this will have a knock-on effect on other properties in the immediate area not included in this Direction. • It will lead to tenants in these properties having to pay higher rents due to the increased costs of property maintenance. • In general, research indicates that authorities that have made Article 4(1) Directions have seen planning applications increase in their authority by around 50-100 per 	<p>make changes. This allows some control over works which are carried out, in order to protect and benefit the historic environment.</p> <p>There is no evidence that Article 4 Directions lead to a fall in property value. The Article 4 Directions being proposed do not restrict changes of use from C3 (dwellinghouses) to C4 (houses in multiple occupation) which would remain permitted development through the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015. Development works associated with changes of use may require planning permission, and advice should be sought from the District Council's Development Control team.</p> <p>As noted above, maintenance is not controlled by the planning system, and so increases in costs cannot be inferred.</p> <p>It is not possible to predict how many applications may be made as the result of the making of an Article 4 Direction, but it is unlikely that 50-100 applications will be made as the result of confirming the Article 4</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>year.</p> <p>Can you assure me that Daventry District Council is able to soak-up this additional workload without additional costs to ratepayers?</p> <ul style="list-style-type: none"> • Daventry District Council are using legislation, primarily intended to limit the ‘studentification’ of areas through HMOs, for a different purpose. This misuse has important financial consequences for owners and occupiers in difficult economic times. • Daventry District Council may well face claims for financial compensation, which I understand can be made in Article 4(1) circumstances. (See Section 108 of the Town and Country Planning Act, 1990.) 	<p>Direction for Weedon Bec. If this number of applications were to be made, it would result in an increased workload for each DDC case officer equivalent to one extra application every two months.</p> <p>The Council intends to monitor applications in order to be able to deal with applications promptly and effectively. It is expected that any increase will be dealt with using existing resource.</p> <p>Whilst Article 4 Directions are used elsewhere to restricted changes of use such as houses in multiple occupation (Use Class C4), it is not true to say that this is their main function.</p> <p>Article 4 Directions were created with conservation areas and the historic environment in mind, as is shown by the direct referral to them in the legislation. Therefore, it cannot be said that their use within a conservation area and for local list properties does not constitute a “misuse”.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Are Daventry District Council able to afford the cost of such potential claims against them?</p> <p>Government guidance to planning authorities says that local authorities should consider making Article 4 Directions only in exceptional circumstances. It is my belief that these do not exist in Weedon and therefore the Direction is wholly inappropriate.</p>	<p>As there is a time delay on the enforcement of the Article 4 Directions for 12 months from their making, it is not possible to make a claim for compensation against the Council. Hence, there should be no cost implications.</p> <p>Article 4 Directions are used to protect the historic environment both within conservation areas, and outside conservation areas where dealing with assets which are identified as locally special. Hence, their use in these cases is considered appropriate.</p>	<p>No change.</p> <p>No change.</p>
Mary Graves (Weedon)	<p>We requested the reasoning behind this in relation to our property and were pointed in the direction of the “Weedon Conservation Area Appraisal and Management Plan 2018”.</p> <p>The only specific reference to 24 Oak Street we could see in this document was with regards to windows: “Victorian fixed casement windows with six or eight lights are common in smaller cottages such as Nos.22-28 Oak Street” Our property consists of modern UPVC windows, would replacing an existing UPVC</p>	<p>Comments noted.</p> <p>Where historic fenestration has been replaced with modern uPVC alternatives, the Council would encourage any future planning applications to</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>windown be deemed as causing harm to the character and appearance of the area? There are many Victorian cottages throughout the village of Weedon Bec with similar characteristics to ours, our property does not appear any more significant in terms of architectural or historic interest. We feel our property is being unfairly singled out for extra regulation and we are being discriminated against compared to other homeowners of similar properties.</p> <p>You have provided contradicting information regarding fees for applications as a result of the presence of an Article 4 Direction. In your "Frequently Asked Questions" letter you advise that "Planning Applications related to Article 4 Direction do incur fees", however the information provided on your website states "There are no fees for an application made as the direct result of the presence of an Article 4 Direction."</p> <p>Imposing an Article 4 Direction:</p> <ul style="list-style-type: none"> Effectively erodes our rights as homeowners to be able to make 	<p>consider the reinstatement of historic materials such as timber. No.24 Oak Street has been included on the Local List as part of the grouping of Nos.22-28 Oak Street. They have been added due to their group value to the street scene, which also includes No.19 Oak Street (Shoemaker's Cottage). As such, the permitted development rights with regards to altering windows have been proposed to be withdrawn.</p> <p>Thank you for bringing this to our attention. This error has been identified and corrected. The regulations were changed in 2019 when fees were introduced at the normal householder rate.</p> <p>The Article 4 Directions removes permitted development rights but does not intend to stop all development from occurring, rather aiming to help</p>	<p>Website has been amended to rectify this .</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>even minor changes/improvements/repairs to our properties. Specifically, changes which do not affect the aesthetic appearance of the house or local area.</p> <ul style="list-style-type: none"> • Will impose additional costs on us. • Have an adverse effect to the intention, with people reluctant to carry out simple maintenance tasks due to the infringement rules and removal of permitted development rights. • Would place unreasonable restrictions on residents and potentially have a negative impact on the desirability of the properties affecting the future marketability and value. <p>Government guidance to planning authorities says that local authorities</p>	<p>the management of change to the historic environment.</p> <p>Where a planning application is required there is a householder fee of £206.</p> <p>Maintenance and basic repairs are not controlled by the planning system as they do not constitute development. The good practice of maintenance and repair is encouraged.</p> <p>There is no evidence to suggest that Article 4 Directions result in lowered value or marketability.</p> <p>Article 4 Directions are used to protect the historic environment both within conservation areas, and</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>should consider making Article 4 Directions only in exceptional circumstances. We believe that these do not exist in Weedon and that the Direction is totally unnecessary.</p> <p>Existing mainstream planning controls are adequate to protect the character and appearance of the village.</p> <p>For the above reasons we strongly object against this Direction.</p>	<p>outside conservation areas where dealing with assets which are identified as locally special. Hence, their use in these cases is considered appropriate.</p> <p>Comments noted.</p>	<p>No change.</p>
Weedon Bec Parish Council	<p>Weedon Bec Parish Council objects most strongly to the imposition of the proposed Article 4 Regulations on 15 properties in Weedon Bec.</p> <p>Whilst appreciating the desirability of protecting heritage assets we are of the view that the Conservation Areas plan and ordinary planning regulations go quite far enough to protect our village.</p>	<p>Comments noted.</p> <p>Within conservation areas many aspects of minor development such as domestic alterations and extensions remain permitted development. Over time, the exercising of these rights can have a detrimental effect on the character and appearance of the conservation area, and Article 4 Directions are common planning tool which allow the District Council to assess proposed changes on a case by case basis, and to steer development so that it is sensitive to the historic environment. Furthermore, Article 4 Directions can also help to protect the historic environment through their use to preserve the</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>The Department for Communities and Local Government Planning Portal states that removal of permitted development rights under Article 4 applies only ‘...where the character of an area of acknowledged importance would be threatened.’ There is no evidence that owners of the 15 properties now nominated for Article 4 regulation, have made or are likely to make, any alterations to their properties that threaten the ‘acknowledged importance’ special locality of Weedon Bec.</p> <p>1. Over years of changes of ownership, older properties now selected for the imposition of Article 4 Regulations have had minor alterations made, none of which has caused offence or been detrimental to the street scene. Article 4 regulations were introduced to be applied in localities where rapid and inappropriate development was impacting on a historic or valued locality or Conservation Area.</p>	<p>character of locally listed buildings, as is noted in Historic England’s Local Heritage Listing Advice Noted 7 (paragraph 13).</p> <p>Article 4 Directions have been proposed where features of value have been identified (such as fenestration) which contribute to the character of the conservation area, or in the case of Local List assets in order to preserve the significance of the asset through careful management of change. There need not be an immediate threat, however there is evidence from across the conservation area showing that many properties have experienced these incremental changes and historic features have been replaced with modern, unsympathetic alternatives.</p> <p>1. As noted above, there are many examples within the conservation area where permitted development rights have been exercised and historic features replaced with unsympathetic alternatives. This takes place incrementally over time, and those properties which are proposed to be covered by the Article 4 Direction have retained features which make a positive contribution.</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>There is no evidence in Weedon Bec that any such threat exists so the use of Article 4 regulations in the way proposed is draconian is not within the intent of the legislation.</p> <p>2. The selection of properties to be covered by the Article 4 proposals seems entirely subjective. No evidence is presented as to the criteria used. There are many older properties in Weedon similar to those selected which contribute to the 'traditional' ambience of the village and which are equally part of the traditional street scene yet they have not been selected Why are such properties omitted?</p> <p>3 There is inconsistency in the selection of properties included. For example, Crown Cottage in Upper Weedon, part of a range of traditional buildings, linking Fern Hollow Farm (Historic England listed) to Pump Cottage (Local List plus Article 4 proposed) has not been selected for inclusion. Crown Cottage is not listed yet it joins Fern Hollow Farm to Pump Cottage. It is</p>	<p>2. The properties which are proposed to be covered by the Article 4 Direction were identified through the conservation area appraisal process. A number of these are entries on the Local List, and criteria for their selection were agreed by the District Council as part of the conservation area review programme. As such, only properties which retain features of value have been identified, rather than their general contribution as part of the conservation area.</p> <p>3. According to the Council's mapping system Crown Cottage is listed alongside Fernhollow Farm, hence it was not included in the original proposals for a Direction. From further research, the property has been confirmed as not being listed. This will be altered on the internal mapping system.</p> <p>Crown Cottage contributes positively to the</p>	<p>No change.</p> <p>Amend GIS mapping for Listed Buildings accordingly.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>virtually the same in size and appearance to Pump Cottage, yet it has been omitted from the Article 4 list. We cannot understand why should one cottage be singled out for Article 4 Directions when its almost identical neighbour in the same range is omitted?</p> <p>4. One of the properties on the Local List and now selected for Article 4 Regulation, has had what the District Council would term 'non-traditional' windows fitted since it was included in the Local List. It remains on the Local List and it is now being selected for additional Article 4 Directions. The windows are not offensive, are of a much-improved standard of insulation and do not restrict light like the previous wooden small pane glazing. They have received complements from local residents (including a local District Councillor) but</p>	<p>range of buildings in its form and scale and the use of vernacular materials, similarly to Pump Cottage. Extending the Article 4 Direction to Crown Cottage would be in line with the use of the Article 4 Direction in Weedon Bec. Adding the property to the existing direction would require the consultation to be run again, which would delay the potential confirmation of the direction. As such, it is recommended that a separate direction be created for Crown Cottage in line with the direction for the Weedon Bec Conservation Area, and that this then be consulted upon.</p> <p>4. Article 4 Directions do not intend to stop development completely. It is not clear from the response which property is being referred to or what is meant by non-traditional, but it is possible that the changes have preserved the character of the property.</p>	<p>No change to existing direction. The Council will seek to make a separate direction relating to Crown Cottage.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>under Article 4 regulations, would not be viewed by the District Council as strictly 'traditional'. This seems to make a nonsense of the selection process and highlights the lack of a proper evidence base.</p> <p>6. One of the properties selected, has had imitation 'Georgian' porch with Doric columns added, probably in the late 20C, to a plain brick vernacular building of much greater age. We are puzzled as to how a porch, which is clearly not at all typical of the locality, can be considered traditional and worthy of Article 4 listing. Elsewhere in the village ordinary planning permission has been granted for porches on similar traditional brick houses without objection and with no detriment to the street scene. Owners of similar properties now selected for Article 4 Directions will not be able to add any sort of porch visible from the street. Please explain these inconsistencies.</p> <p>7. It is the frequent experience of residents that regulations proposed by the District Council's Planning Strategy, such as these for Article 4 Direction, are interpreted and</p>	<p>6 (sic).The proposed Article 4 Directions are not intended to stop all development from occurring, and the restrictions cover both the construction and demolition of porches, in order to preserve features of value, and does not mean that construction of porches will not be permitted. Again, it is not exactly clear which property is being referred to here, however No.50 Queen Street (which is a Local List candidate and proposed to be covered by the Article 4 Direction) does have a substantial porch with Doric columns, which contributes positively to the character of the Georgian villa.</p> <p>7.In determining planning applications, the Council must take account of national and local policy which encourages sustainable development and promotes positive action against climate change. In the first</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>applied by officers in the District Council’s Planning and Development Control departments in an over strict manner with little regard to the needs of modern family living. For example, energy costs are high. Government policy encourages householders to reduce energy consumption yet installation of modern plastic framed double glazing with a ‘traditional’ look will not meet with approval. The alternative of near conservation grade ‘sash or small pane windows’, which we are advised the District would require, is expensive; a cost that the owners will not have bargained for when they purchased the property.</p> <p>Surprisingly, several of the properties scheduled for Article 4 Directions already have a variety of styles of ‘faux’ small pane modern plastic windows already in situ. When these needing upgrading to more modern energy standards the owners will be required to install wooden frames. This</p>	<p>instance, there are many ways in which the energy efficiency of a home can be improved without the need for development, such as the installation of insulation, door and window draft excluders (small brush excluders) or secondary glazing, and even simple measures such as closing thick curtains or shutters can have a dramatic impact.⁸ As noted above, modern uPVC windows can have an unintended negative impact both financially and with regards to climate change.⁹ Furthermore, modern plastic alternatives are rarely able to achieve the visual quality of historic timber fenestration or doors and can have a big impact on historic character.</p> <p>As noted above, one property which has uPVC fenestration has been included in the direction due to its local listing and group value to the street scene. Many changes can be made to a property to increase energy efficiency under government initiatives without the need for planning permission, whilst sustaining historic character. Advice on this has been</p>	<p>No change.</p>

⁸ Modifying Historic Windows as Part of Retrofitting Energy-Saving Measures | Historic England

⁹ <https://www.bwf.org.uk/wp-content/uploads/Life-Cycle-Assessment-Report-1.pdf>

Respondent	Comment	Suggested Response	Suggested Action
	<p>will be more expensive to meet the higher standard of energy conservation and 'traditional' requirements under Article 4. Owners are quite likely not to have budgeted the additional the cost of such additional requirements plus the £206 cost of making a special application. They may well be left with little choice but to neglect repair work both devaluing their homes an incurring the cost of less energy efficiency. Why should those selected for Article 4 regulation be so penalised?</p> <p>8. Solar panels will not be permitted on a roof facing the street, 'highway, waterway or open space' Central Government energy policy encourages people to adopt energy saving measures. In many older properties the public frontage on to the street is the only one of sufficient size to accommodate solar panels. Not only does this stipulation go against national and local environmental policy but it discriminates against those</p>	<p>published by Historic England and is available on their website.¹⁰ There is evidence to suggest that the use of materials such as uPVC, as compared to modern high-standard wooden alternatives, can increase the levels of carbon dioxide released into the atmosphere over the life cycle of the window or door reducing levels of sustainability and energy efficiency.¹¹ Furthermore, with simple, routine maintenance, timber fenestration and doors have a projected lifespan which greatly exceeds guarantees on uPVC alternatives, meaning that their overall cost is often less than that of uPVC replacements.</p> <p>8.The Article 4 Directions proposed for Weedon Bec do not propose to restrict the installation of solar panels as this is already controlled through the provisions of the General Permitted Development (England) Order 2015. More information on this can be viewed on the government's Planning Portal website- Planning Permission: Solar equipment mounted on a house or a block of flats or on a building within the curtilage Solar panels Planning Portal.</p>	<p>No change.</p>

¹⁰ www.historicengland.org.uk

¹¹ <https://www.bwf.org.uk/wp-content/uploads/Life-Cycle-Assessment-Report-1.pdf>

Respondent	Comment	Suggested Response	Suggested Action
	<p>house owners selected for Article 4 regulation.</p> <p>9. The market value of the properties selected for Article 4 regulation will be adversely affected. House hunters looking for an affordable older property will not want a one where small every day changes trigger the additional cost of a planning application.</p> <p>Houses subject to Article 4 will not have the kudos of being a Listed building for which better off people are willing to pay.</p> <p>When it comes to selling, houses subject to Article 4 Directions will not be as attractive as almost identical neighbouring properties and will be more difficult to sell. Long standing or elderly owners selling to downsize or fund retirement will find their plans thwarted by this retrospective regulation that the District Council is proposing.</p> <p>In summary, the imposition of Article 4 Directions amounts to a discriminatory tax</p>	<p>9. There is no evidence to suggest that property prices are adversely affected by the presence of an Article 4 Direction.</p> <p>Comments noted.</p> <p>As noted above, there is no evidence to suggest that Article 4 Directions affect property marketability.</p> <p>The properties have been selected through the conservation area appraisal and local listing process,</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>on those householders selected. It is furthermore an unjust tax as the selection of properties is inconsistent and without proper evidence.</p> <p>There is however, every evidence that owners of the properties selected for Article 4 regulation value their homes and the local environment and make every effort to fit in to the local street scene in the same way as owners of the many very similar 'traditional' houses in the village which are not selected, but remain subject to ordinary planning regulations.</p> <p>Article 4 regulation is neither necessary nor appropriate in Weedon Bec; Householders affected are distressed by the potential additional costs and the clear implication that the District Council does not trust them to act sensibly in making minor changes to their property.</p>	<p>due to the retention of feature of value which can be protected through the management of an Article 4 Direction.</p> <p>It is clear that previous development choices have preserved the character of the properties, which is why they have been identified as making a contribution to local character. Article 4 Directions are put in place for long term management for the life of the property, in order to steer future development.</p> <p>All applications will be dealt with in accordance with national and local policy and legislation as well as other material considerations including the range of guidance available like Conservation Area Appraisals and National Planning Practice Guidance. The development which is proposed to be restricted is not that which will be undertaken frequently, and maintenance and repair can continue without the need for planning permission.</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>The exercise puts the District Council in an extremely poor light and reaffirms the prevalent local view that the Council is incapable of working in partnership with local people.</p>	<p>The Council has sought to engage with the community and parish council throughout the work. Officers and members of the former District Council have met with parish council representatives to discuss the conservation area designation and article 4 proposals, and has held exhibitions in the village to provide an opportunity for the local community to see material and discuss any concerns with council officers. The proposals have also been subject to informal consultation at the conservation area appraisal stage, and now a formal consultation has also been undertaken.</p>	<p>No change.</p>
<p>Spencer and Judith Allnat (Weedon)</p>	<p>I have for many years been a member of the Georgian Group, and indeed lived in several Georgian Houses, so am not opposed to conservation. The considerable restoration work carried out on Pembroke House, including stonework, windows and roof have been carried out by us using quality materials and builders, in the main Leatherlands.</p> <p>When we purchased Pembroke House, the porch had a 1970's flat tarmac (leaking) roof no stone pillars just breeze blocks and used ill fitting glass and doors, more suitable to a commercial building. The house had very little to recommend itself</p>	<p>Comments noted.</p> <p>Comments noted.</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>visually and had most of the original features removed inside and out.</p> <p>The stone porch you now see, was carried out by a specialist stone mason at my direction and has a hidden steel and concrete ring-lintel to stabilise the doorway; as the 1970's closed porch which was very poorly constructed had introduced dry rot into the fabric of the house and in particular the oak lintel over the front door. All the stone used including sills and porch are of Bath stone which matches the original stonework of the sills and facings exactly.</p> <p>The beautiful round top sash window on the west side elevation was not here either. I prepared drawings for it based on the mouldings of the original Georgian windows that remained and in the appropriate proportions. The outside of Pembroke House was in a very sorry state when we arrived, with the above features totally absent.</p> <p>Given the foregoing it seems to me that we have proved ourselves perfectly able to not</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>It is clear that the property has been maintained and features of value both preserved and enhanced.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>only preserve the character but improve it under the present rules, and cannot but feel rather harshly treated to be singled out with the imposition on us in our retirement of extra fees and paperwork, with its incipient delays over and above the normal, for any work we may need to carry out to maintain Pembroke House in the manner already indicated.</p> <p>I am no longer able to do the maintenance work I have done in the past, such as repairing the perimeter walls etc. I notice also that many older properties in the village and in particular around the green here at Upper Weedon that are of the same period or earlier than Pembroke House, are not on the list, so I would like you please to explain the criteria that is being applied and why we are on the list whilst others are not.</p>	<p>Hence, it has been identified for the Local List and proposed Article 4 Directions in order to maintain its positive character for the future. The work undertaken has had a positive impact, and under current permitted development rights many of those features which have been preserved or enhanced could be replaced without any controls. An Article 4 Direction will encourage their retention and maintenance in future development decisions.</p> <p>Maintenance is not covered by the planning system, and so this can continue (whether by the owners of a property or by external professionals) without the need for planning permission. Age is not the only factor taken into account. In considering those properties which may be subject to an Article 4 Direction, we identify features of value which make a positive contribution to the character and appearance of the conservation area. Local List candidates are subject to specific criteria (and a scoring threshold which must be met) which are:</p> <ul style="list-style-type: none"> • Age • Condition • Architectural merit • Materials • Group value • Viability • Historic association 	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>If we are singled out because we have maintained our home and indeed restored the Georgian features that set it apart and add qualitatively to the environment, it means that past neglect is now being rewarded. Which of course has self evidently been the case during the thirty plus years or so that we have lived here. Especially as regards doors and windows. To know the basis of the decision to single our home out in this way, is essential to any intelligent discussion or debate of the issues involved. Even our ability to maintain Pembroke House for the remainder of our years here now comes into question. I can foresee some of us not being able to afford the increased costs and as a result letting things go surely detrimental to your aims.</p> <p>Finally, I would also like to know how your proposals will affect an application for Grade 2 listing. We look forward to hearing from you.</p>	<p>As noted above, maintenance is not controlled by the planning system, and good maintenance is encouraged. Assumedly, as many of the features of value have been well-maintained they are not likely to require frequent replacement. Furthermore, if like-for-like replacement were proposed, it is not likely that planning permission would be necessary as this would preserve the character of the building.</p> <p>It is normally the policy of the Council not to place Article 4 Directions on a listed building, as changes are already substantially controlled by the listed building consent system.</p> <p>Further information as to the stage that the application for listing has reached has been sought from the respondent. No further information has been</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
		<p>provided. Advice from Historic England officers has suggested that, currently, new listings are focused on strategic projects around England and that individual applications are unlikely to be a priority. As such, it is recommended that the Article 4 Direction remain as proposed with regards to No.50 Queen Street. Should the building be listed in the future, then the matter could be revisited.</p>	
Philip Ayres	<p>The letter you delivered to us eludes to a process of needing to apply to DDC for permission to undertake any work to the external fabric of our house or the curtilage but has scant detail about how or what this would entail.</p> <p>Please will you provide an explanation of the process I would be expected to adhere to, the timelines this would take and include any associated costs (if applicable) I would be expected to pay. There is no mention of any costs in the letter you issued to us but I have been led to believe there would be some and could be prohibitive.</p> <p>As an example, if I wanted to repaint my front door please explain to me all the</p>	<p>Comments noted.</p> <p>The process of making a planning application is now normally handled online through the Planning Portal- Applications Planning Portal. Householder applications are normally dealt with within eight weeks of validation of the application. Householder applications attract a fee of £206.</p> <p>If the repainting is in the same colour, then planning permission is not needed. Maintenance is not</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>steps you would expect me to follow and what obligations DDC would have (including SLA's you work to) to ensure I am not unfairly prejudiced in being able to maintain my own property.</p>	<p>controlled by the planning system. If it was proposed to be a different colour, then you may need to submit a planning application which can be done online. If your house is within the conservation area, then in determining the application the Council would be required to assess whether the proposals would preserve or enhance the character and appearance of the conservation area.</p> <p>There are no Service Level Agreements for this as such, however, householder applications are usually determined within 8 weeks.</p>	
Welford			
<p>Timothy Fuller and Jennifer O'May</p>	<p>We would like to register our objection to the council placing Welford into Conservation Village status with <u>no consultation in advance</u> (at least we were not aware of any and did not receive a letter) and to the subsequent Article 4 Direction (which has been the subject of a consultation letter).</p>	<p>A public consultation on proposals for the Welford Conservation Area boundary and accompanying Appraisal and Management Plan was carried out between January 20th and March 2nd 2020 and the time limit for formal objections to the conservation area consultation has now elapsed. The public consultation was publicised on the former District Council's website, in the Welford Bugle, notices were put on all the village notice boards and it included a public exhibition held in the village hall, which was well-attended. A Statement of Consultation can be found on the Council's website at https://www.daventrydc.gov.uk/living/planning-</p>	<p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>Planning restrictions should carefully balance a wider community view with the rights of the land/property owner to develop their property. I believe that the concept of a Conservation area is to protect streets and surrounds from inappropriate development. I can understand extra layer of Conservation village status for particularly beautiful and unspoilt villages. Of course, important buildings are already protected by 'listed status'.</p> <p>To be candid, Welford has already had many developments and over the years has become a mixed bag. If Welford is to be a Conservation village nearly every village in the county should become one. In other words this is planning control overreach. In the circumstances we object to the imposition of additional planning regulations, bureaucracy and cost.</p>	<p>policy/conservation-areas/ All addresses within the conservation area were sent a letter confirming the designation of the conservation area.</p> <p>Conservation area status is not necessarily reserved for 'beautiful and unspoilt villages' but rather those places that display a particular architectural and/or historic character which makes them unique and locally distinctive. Welford's special architectural and historic character and the reasons for its designation as a conservation area are set out in the Welford Conservation Area Appraisal and Management Plan, which can also be viewed using the link above.</p> <p>Although a number of areas within Welford have been developed in recent years, there are several streets and groupings of buildings where there has been relatively little change, for example High Street and parts of West End. These areas have retained their historic and architectural character but small, incremental changes to individual buildings can have a detrimental effect on the overall historic character of the village. The purpose of the Welford Article 4(1) Direction, which is the subject of the current public consultation, is to prevent the loss of such features by removing particular permitted development rights. Its</p>	<p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
		purpose is not to prevent development from taking place but rather to steer it so that historic features or materials that contribute to the historic character of an individual building, and to the conservation area as a whole are, where possible, retained.	
Ian Ransom	<p>I wish to strongly register my disagreement with this infringement of my Civil Liberties.</p> <p>For two years my house was subject to excessive vibration caused by lorries and farm tractors and trailers crashing through ill repaired roads.</p> <p>This was finally repaired this year after countless sleepless nights.</p> <p>These lorries and Tractors still continually flout the Speed Limits at the north end of the village.</p> <p>I was also led to believe that Car Transporters were banned from this village but these still pass through with regular monotony.</p>	<p>Whilst sympathetic to the issues you are experiencing with traffic using High Street, it is not within the remit of this consultation to address this, but your comments have been passed on to colleagues in the highways team. . If damage is occurring to parked vehicles, residents may wish to consider contacting the police and/or the company of the vehicle that caused the damage with evidence of the vehicle(s) involved.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>In essence this is not a picturesque rural idyl this is a rat run for traffic coming from the A14.</p> <p>I have lost count of the amount of times mine and my neighbours cars have been hit by passing traffic outside. Multiple wing mirrors and even a full bumper being ripped off.</p> <p>Perhaps if your planners had insisted on a south bound exit for the A14 to the M1 we would not be experiencing this excessive traffic.</p> <p>Due to the pollution and damage caused by these lorries my house currently needs the rendering repaired and painted.</p> <p>Because of delays in building works due to Covid the chances of getting this carried out in the near future is negligible.</p> <p>Why the person living at Number 3 the Square is allowed to do this, without</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>The purpose of the proposed Article 4(1) Direction is not to prevent you from carrying out the specified works to your property but to require you to apply for planning permission to do so. This will help to ensure that particular features of buildings within the conservation area that have been identified as contributing to its historic character are, where possible, retained.</p> <p>Article 4 Directions are targeted to preserve or enhance the character and appearance of conservation areas through the protection of features</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Respondent	Comment	Suggested Response	Suggested Action
	<p>begging for permission, but the other three residents are not is a mystery to me!</p> <p>When I moved into this house there was no discussion about these draconian measures being inflicted upon us and I believe that there is no need for them now.</p> <p>It is ludicrous that the first we see is a note on a post when having our rights removed!</p> <p>I am not sure who told you Number 1 had a slate roof but they are incorrect. So can I take it that I can be removed from these measures?</p>	<p>of value (such as traditional forms of windows or roofing) through the planning system, so that their alteration or removal can be assessed on a case-by-case basis. Hence, not every property in Welford will be covered by the Direction. The proposals were formulated as part of the Welford Conservation Area Appraisal which was undertaken in 2019/20. As such the Article 4 Direction could not have been publicized prior to this.</p> <p>Letters were sent to all affected households, including No.1 The Square.</p> <p>Your property, along with a number of others, has been chosen to be included in the Article 4(1) Direction because it was thought to have a slate roof, which is a characteristic of the village. It has been brought to our attention that this is not the case, and as such the property will be removed from the Direction. On the more general point regarding rendering and painting, conservation area status removes permitted development rights for rendering or cladding a property (hence why a neighbouring property is not included in the Article (4)1 Direction because their property is within the conservation area). It does not remove the permitted development right to paint the exterior of a property,</p>	<p>No change.</p> <p>Remove No.1 The Square, Welford from the Article 4(1) Direction. Welford Article 4 Direction, page 4, Schedule 2, remove text: “The Square 1 The Square”</p>

Respondent	Comment	Suggested Response	Suggested Action
		<p>however. Therefore, this has been included in the Article 4(1) Direction with the aim of conserving buildings with decorative brickwork or stone buildings, which can be seen in various parts of Welford. For properties like yours that are already rendered/painted, if future works are carried out using like-for-like materials planning permission may not be required. Because every building is different, this would need to be checked prior to works being undertaken with the Council's Planning Department, which can be contacted on Planning@daventrydc.gov.uk or 01327 871100.</p> <p>Subject to the consultation, the earliest that the Article 4(1) Direction would come into force would be 28th September 2021.</p> <p>All properties to which the proposed Article 4(1) Direction applies were sent a written letter through the post informing them of the proposals and the public consultation.</p>	

Appendix B – Responses to consultation 2021

Respondent	Comments	Suggested Officer Response	Suggested Action
All conservation areas			
Department for Levelling Up, Housing and Communities	I refer to your email of 28th September with attachments notifying the Secretary of State that immediate and non-immediate Directions relating to the above locations were made on 28th September 2021. You are reminded to advise the Secretary of State about confirmation of these Directions in those circumstances as set out in the regulations. It would also be helpful to know if the Council decides in due course not to confirm these Directions.	Comments noted.	No change.
Flore Conservation Area			
G J Blundell	Please note High Street Flore , property listed as 44a is only a Granny Flat adjoining the main house :44 High St.	Thank you for providing this information. As usual policy is not to place Article 4 Directions on flats such as these adjoined to dwellings, it is suggested that 44a High Street be removed from the direction.	Remove text as follows, page 2 of Flore direction, paragraph 4: “ High Street Nos. 2, 4, 6, 8, 10, 12, 25, 28, 34, 36, 42, 44a”
Little Everdon Conservation Area			
Charles Coaker	I am the owner, or am responsible for the management of, all the properties listed in Schedule	Comments noted.	No change.

	<p>Two with the exception of The Cottage.</p> <p>I entirely accept your wish to maintain the visual appearance of Tathams and Lower Yard. However Nos 1-2 New Cottages are post war mainly, built with reclaimed materials, and the Bungalow was probably built in the 1960's and is completely devoid of architectural merit.</p> <p>There is no intention to alter or enlarge any of these properties but I am concerned that with the increasing emphasis on improving insulation to meet carbon neutral targets you are condemning these properties to failing on this front by not allowing any form of double glazing. All three properties have thermally inefficient casement windows and would benefit from double glazing.</p>	<p>Comments noted.</p> <p>The article 4 directions are not put in place to completely halt development, rather, they allow decisions which may affect the character of the conservation area to be considered on a case by case basis. There are very few buildings within the Little Everdon Conservation Area, and Nos.1-2 New Cottages and The Bungalow show the evolution of the estate land in the 20th century. As such, development which affects them could have an impact on the overall character of the conservation area. It is not necessarily the case that planning permission would not be</p>	<p>No change.</p> <p>No change.</p>
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	<p>I would like my concerns noted so that if, in the future, the properties are forced to meet better EPC ratings, the ability to improve the thermal insulation of the windows is considered. It should be noted that they face a lane which is a dead end with only one property beyond so they are hardly in the glare of the public gaze.</p>	<p>given to alter the existing windows for example, but having the direction in place allows their design and materials to be considered in light of the conservation area designation.</p> <p>Comments noted. Should any more information be required about historic buildings and current EPC rating guidance, please contact our planning department at planning.ddc@westnorthants.gov.uk.</p>	<p>No change.</p>
Pitsford Conservation Area			
<p>David Armitage</p>	<p>With regard to the order under Article 4(1), we note that Middlesex House and Collyweston House are included in the order, but not Middlesex Cottage. Middlesex Cottage is attached to Collyweston House, and the rear aspect of Middlesex Cottage is an integral part of the street scene on the High Street. I suggest that consideration should be given</p>	<p>Thank you for this information. The Council is aware that the property is split into three residences, and all three are intended to be covered by the direction, as is shown in the map which can be viewed at the end of the direction. As the building was historically known only as “Middlesex House” before being split, this is therefore how it was referred to in the schedule of addresses in the direction.</p>	<p>Add new text page 2, paragraph 2:</p> <p>“High Street Middlesex House <u>Middlesex Cottage”</u></p>

	<p>to include the rear of Middlesex Cottage in the Article 4(1) order. The attached photo clearly shows the three relevant properties seen from the High Street.</p>	<p>The omission of Middlesex Cottage from the schedule of addresses is an error which will be corrected in the final version of the direction.</p> <p>The Council can confirm that Middlesex House, Middlesex Cottage and Collyweston House were all sent notification letters to inform them of the direction's publication.</p>	
Weedon Conservation Area			
Philip Ayers	<p>I raised objections to the proposed imposition of being obligated to adhere to unfair restrictions during the consultation in 2020 but it seems the these been pushed through anyway, as you have ensured has happened in most areas across the district. It was clear from the outset that this was a fait-a-complete no matter who or what objections were raised. I still don't feel any of the queries I raised last year have been adequately responded to.</p>	<p>Your comments to the consultation which took place in autumn 2020 were received and logged as part of the consultation responses. As per my email of 7th April 2021, we experienced delays in publishing the report due to other work priorities. Since that time, it has not been possible to present the responses to Council, and so a further consultation is being undertaken. This process is set out in the letter sent to you notifying you of the consultation.</p>	No change.

	<p>The most unfair aspect of this directive is potential financial impact myself and other homeowners will be expected to shoulder that we did not expect when we purchased our properties and the impact this may have on resale value and market appeal when we come to sell. You have still not answered the question of what charges we will expect to pay so I will spell the question out for avoidance of doubt - Do we have to submit a planning application for every piece of work that has a visual impact (even if it's like for like) at the full cost of £206 each time? This should be a simple 'yes' or 'no' but you have refused to answer.</p> <p>I consider it would be reasonable that we should only be asked to consult with the council for approval to conduct maintenance work on our houses where if any other</p>	<p>Regarding your other queries, the current cost of a householder planning application is still £206. If you are conducting “like-for-like” work, this normally doesn’t class as development and therefore wouldn’t require a planning application. This would, in most cases, require an identical design, as well as materials and finishes, so a timber casement window would need to be replaced with a timber casement window of the same design and finish, for example. If multiple changes are proposed, such as to windows <i>and</i> doors <i>and</i> roofing, it is possible to combine proposals into one application, therefore saving multiple fees.</p> <p>It is always advised that contact should be made with our planning department before undertaking any work, to ensure all conditions are being met (not just those imposed by a conservation area or Article 4</p>	<p>No change.</p> <p>No change.</p>
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	<p>homeowner whose property does not sit on the list were to wish to complete the same works they would not need to seek permission from the council. This should be at no cost to the homeowner or you will be financially penalising myself and many others unfairly for purchasing properties possible many years or even decades before this scheme was dreamt up.</p>	<p>Direction, but general planning conditions also). There is no evidence to suggest that being in a conservation area or having an Article 4 Direction affects marketability or sale values of properties. Maintenance of properties is important, and good, timely and appropriate maintenance is encouraged so that fewer wholesale replacements of historic fabric are necessary. Maintenance usually does not class as development either, and so does not require the submission of a planning application.</p>	
Welford Conservation Area			
<p>Tim Fuller and Jeni O'May</p>	<p>We are pleased about the second consultation because we were not aware of the first and were surprised to be informed of the new regulations.</p> <p>Planning control is a balance between the rights of the home owner to do what they like with their own house and plot versus the views of the wider community. We already have</p>	<p>For clarification, the current consultation is with regard to an Article 4(1) Direction and not the conservation area designation, which came into place on 23rd July 2020 following a 6-week public consultation held between January and March 2020. An earlier public consultation regarding the Article 4(1) Direction took place in October/November 2020, at which</p>	<p>No change.</p>

	<p>strong planning and building controls including listed status. Welford has very mixed housing stock and is not very a pretty village.</p> <p>We believe that further planning restrictions in the form of conservation area status are not warranted in Welford and we do not support them.</p>	<p>point notification was sent by letter to all affected properties. The respondent's property is not a statutory listed building and, therefore, is not subject to the additional planning controls that listed building status confers. The building is on the council's local list, which identifies buildings and sites that are of local significance. Local list status does not confer additional planning controls. Instead, when changes to a locally listed are proposed through a planning application they are assessed against the council's policies on non-designated heritage assets and with reference to the Welford Conservation Area Appraisal and Management Plan (2020) which is a supplementary planning document. Article 4(1) Directions remove permitted development rights for particular types of minor development and are a common planning tool in conservation areas. They aim to protect features that contribute to the distinctive historic character of the area and concern types of development that</p>	
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		<p>effect the external appearance of a building. They do not prevent development from taking place but introduce the need for a planning application so that the stipulated types of development can be managed in a way that is sensitive to the historic environment.</p> <p>Welford Conservation Area has a distinctive character, which is described in the Welford Conservation Area Appraisal and Management Plan (2020). The Article 4(1) Direction will provide the council with additional planning tools with which to preserve and enhance its special character.</p>	
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