

**Historic Environment  
Supplementary Planning  
Document (SPD)  
Consultation Statement  
December 2015**

## **Historic Environment Supplementary Planning Document Town and Country Planning (Local Planning) (England) Regulations 2012 Consultation Statement in accordance with regulation 12(a)**

The Town and County Planning (Local Planning) regulations of 2012 stipulate in regulation 12(a) that before adoption of a supplementary planning document, the local planning authority must prepare a statement setting out:

- I. The persons that local planning authority consulted when preparing the supplementary planning document;
- II. A summary of the main issues raised by those persons, and;
- III. How those issues have been addressed in the supplementary planning document.

In accordance with that regulation 12(a) the persons and organisations listed in appendix A were consulted in preparing the Historic Environment SPD.

Consultation on the draft SPD was carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the measures set out in the Council's adopted Statement of Community Involvement.

The document was made available for public inspection for a six week period between the 2<sup>nd</sup> July 2015 and the 13<sup>th</sup> August 2015. Copies of the draft SPD were available during normal office hours at the following location:

- Lichfield District Council Office, Frog Lane, Lichfield.

Copies were also available to view on the Council's website. Further information was available by contacting the Spatial Policy and Delivery Team or e mailing [developmentplans@lichfield.gov.uk](mailto:developmentplans@lichfield.gov.uk). Responses could be made via the development plans e mail at [developmentplans@lichfieldddc.gov.uk](mailto:developmentplans@lichfieldddc.gov.uk) and via the council's consultation system at <http://lichfeilddc-consult.limehouse.co.uk/portal> or sent in writing to Spatial Policy and Delivery Manager. It was made clear on all publications that the consultation ended on Thursday 13<sup>th</sup> August 2015, 5.00pm

The following measures were undertaken to inform persons of the draft SPD consultation and document availability:

- Notification e mails where sent to all individuals/organisations/bodies that the Council considered would be affected or interested in the SPD.
- A Press Notice was posted in a local paper
- A press release was issued
- The SPD and details of the consultation were posted on the Council's website.

Appendix B to this document sets out the responses received to the consultation and how the issues raised have been addressed in the SPD.

# Appendix A

## Persons Consulted on the Historic Environment SPD

All consultation was via email through the Planning Consultation Portal

<b>Persons Consulted</b>	
<b>SPECIFIC CONSULTATION BODIES</b>	
<p><b>All Parish Councils within Lichfield District</b></p>	<p><b>People on the Consultation Portal list: over 2000</b></p>
<p><b>Parish Councils outside Lichfield District</b></p> <ul style="list-style-type: none"> <li>• Abbots Bromley Parish Council</li> <li>• Blithfield Parish Council</li> <li>• Brereton &amp; Ravenhill Parish Council</li> <li>• Coton in the Elms Parish Council</li> <li>• Hoar Cross Parish Council</li> <li>• Lullington Parish Council</li> <li>• Middleton Parish Council</li> <li>• Netherseal Parish Council</li> <li>• Newton Regis, Seckington &amp; No Man's Heath PC</li> <li>• Norton Canes Parish Council</li> <li>• Overseal Parish Council</li> <li>• Rugeley Town Council</li> <li>• Shuttington Parish Council</li> <li>• Stowe by Chartley Parish Council</li> <li>• Walton on Trent Parish Council</li> <li>• Yoxall Parish Council</li> </ul>	<p><b>County Councils/Unitary Authorities</b></p> <ul style="list-style-type: none"> <li>• Birmingham City Council</li> <li>• Derbyshire County Council</li> <li>• Leicestershire County Council</li> <li>• Staffordshire County Council</li> <li>• Stoke on Trent City Council</li> <li>• Walsall Metropolitan Borough Council</li> <li>• Warwickshire County Council</li> </ul>
<p><b>Local Planning Authorities</b></p> <ul style="list-style-type: none"> <li>• Cannock Chase Council</li> <li>• East Staffordshire Borough Council</li> <li>• Newcastle under Lyme Borough Council</li> <li>• North Warwickshire Borough Council</li> <li>• North West Leicestershire District Council</li> <li>• South Derbyshire District Council</li> <li>• South Staffordshire Council</li> <li>• Stafford Borough Council</li> <li>• Staffs Moorlands District Council</li> <li>• Tamworth Borough Council</li> </ul>	<p><b>National Organisations</b></p> <ul style="list-style-type: none"> <li>• Arts Council</li> <li>• British Pipelines Agency</li> <li>• British Telecom Group</li> <li>• Canal &amp; River Trust</li> <li>• Central Networks</li> <li>• Centro</li> <li>• Crown Estates</li> <li>• Council of British Archaeology</li> <li>• Defence Infrastructure Organisation</li> <li>• Design Council</li> <li>• Forestry Commission</li> <li>• Environment Agency</li> <li>• Health and Safety Executive</li> <li>• Heritage Lottery Fund</li> <li>• Highways Agency</li> <li>• Historic England - Birmingham Office</li> <li>• Home Builders Federation</li> <li>• Inland Waterways Association (Lichfield Branch)</li> <li>• National Federation of Gypsy Liaison Groups</li> </ul>

**Schools**

- Chase Terrace Primary School
- Chase Terrace Technical College
- Hayes Meadow County Primary School
- Holly Grove Primary School
- John Taylor High School
- Little Aston Primary School
- Nether Stowe School
- Rawlett High School
- Saxon Hill School
- St. Stephens Primary School
- The Friary High School

- National Grid (Gas)
- National Grid Plant Protection
- National Trust
- Natural England
- Network Rail
- Office of Rail Regulation
- Royal Mail Group c/o DTZ
- Severn Trent Water Ltd
- Sport England
- Sport England West Midlands
- The Coal Authority
- Western Power Distribution

**Other consultee groups/organisations**

- Aldi Stores Ltd
- Alpha Project Management Ltd
- Alrewas Civic Society
- Alrewas Conservation Group
- Arts Foundation for Lichfield
- Ashfield Land Ltd
- Aspen Retirement Group
- AVK Motorsport Ltd
- Barton Willmore
- Barwood Strategic Land II LLP
- Beacon Street Area Residents' Association
- Beautiful Gardens
- BNP Paribas Real Estate UK
- Booth Trustees
- Borrowcop & District Residents' Association
- Borrowcop Management Consulting Ltd
- Bradshaw Bros. Ltd.
- Broome Manor Limited
- Building Research Establishment
- Burntwood Action Group
- Burntwood and Hammerwich Action Group
- Burntwood Business Community
- Burntwood Live at Home Scheme
- CALA Homes (Mids)
- Campaign for Real Ale Limited

- McClean Family Pension Fund
- Mease Valley Group
- Midland Co-op
- Miller Homes Ltd - East Midlands Region
- National Memorial Arboretum
- NAYC (Whitemoor Haye)
- NFGLG
- NFU Mutual Office
- NHS Cannock Chase Clinical Commissioning Group
- NHS Property Services Ltd
- NHS South East Staffordshire & Seisdon Peninsula CCG
- Objective Corporation
- Open Spaces Society
- OPT
- Orbit Housing Association
- Overbury
- Pall Mall Investments Ltd
- Palletways UK Ltd
- Paradise Found
- Parkridge Homes
- Partner Construction Ltd
- PDSA
- Persimmon Homes (West Midlands) Ltd
- Persimmon Homes Ltd
- Peter Roberts
- Pipe Green Trust
- Planning and Design Practice
- Planware Limited
- ProLogis
- Radleigh Homes

- Campaign to Protect Rural England - Staffordshire District Group
- Cannock Chase AONB Joint Committee
- Cannock Chase AONB Unit
- Carillion Developments
- Carnegie UK Trust
- CBI West Midlands Region
- Central Garage
- Central Rivers Initiative
- Chartre Associates Limited
- Chase & Partners
- Chasetown Preservation Group
- Chasewater Wildlife Group
- Christchurch Primary School
- Church Commissioners
- Civic Society
- Clifton Campville Millenium Green Trust
- Clinical Commissioning Group, NHS England
- Coltman Precast Concrete Ltd
- Country Land & Business Association Ltd
- CPBigwood
- CT Planning
- Curborough Consortium (RPS)
- Cycling Club Giro
- Data Identic Ltd
- David Wilson Estates
- Davy Developments Ltd
- Deloitte LLP
- Deltabridge Investments
- Derbyshire Gypsy Liaison Group
- Development Securities (Lichfield) Ltd
- Dorsman Estates Ltd
- Drayton Manor Park
- Eden Wood Limited
- Elford Homes Ltd
- Entec UK Ltd
- Envirowatch UK
- F W Ridout & Co
- Field Hamlin
- Fields In Trust
- Ramblers Association
- RCA Regeneration Limited
- Redrow Homes (Midlands) Ltd
- Represented by Star Planning
- Retirement Housing Group
- Revelan
- Revelan Group Plc
- Richborough Estates Ltd
- Ridware History Society
- Rob Duncan Planning Consultancy
- ROM Ltd
- Rowe & Sons
- Royal Institute of British Architects Client Services
- Royal Sutton Cycling Club
- RSPB Midlands Regional Office
- Rugeley Power Ltd
- S Harrison Developments Ltd
- Sainsbury's Supermarkets Limited
- Salton Europe Ltd
- Satnam Planning Services Ltd
- Savills
- Shenstone & District Car Club - Curborough
- Shipley Estates Limited
- Skills Funding Agency
- Smiths Gore ATE Wales
- Soleco UK Limited
- South Lichfield Residents Group
- South Staffordshire Mental Health Network
- South Staffordshire Water Plc
- Spire Healthcare Limited
- Sport Across Staffordshire & Stoke on Trent
- SSLEP
- St Giles Hospice
- St John's Church Shenstone & St Peter's Church Stonnall
- St Martins Property Investments Ltd
- St Pauls Res. & Commercial Property

- Fine Thompson Ltd
- First City
- Forest of Mercia
- Fosse Way Investments Limited
- Fradley Against Curborough Town
- Fradley Park Developments Ltd
- Fradley Village Hall Management Committee
- Fradley West Consortium
- Friend Associates
- Friends of Hopwas Wood
- Fulfen Primary School
- Future Energy Solutions
- GABEM (504225) Ltd
- GBSLEP
- GKN Group Services Limited
- Gladman Developments
- Gleeson Stategic Land
- Global Mapping Ltd
- Gregory Gray Associates
- Grosvenor Gospel Hall Trust
- Hammerwich Environment Group
- Hodgetts Estates
- Homes and Community Agency
- Hopwas Methodist Church
- Howkins and Harrison
- HS2 Ltd
- HSBC Bank PLC
- HSI UK Active Fund
- IGM Projects Ltd
- Infrastructure Planning & Design Limited
- Instaffs (UK) Ltd
- Institute of Directors
- International Power Plc
- J S Bloor (Services) Ltd
- J T Leavesley Ltd
- J.A. Nichols
- Johnson Fellows
- JPE Holdings Ltd
- JVH Town Planning Consultants Ltd
- St. Matthews Hospital Cricket Club
- Staffordshire Fire & Rescue Service HQ
- Staffordshire Gardens & Parks Trust
- Staffordshire Police - Trent Valley Division
- Staffordshire Police Partnership
- Staffordshire University Lichfield Centre
- Staffordshire Wildlife Trust
- Stewart Ross Associates
- Stoford Developments Ltd
- Streethay Against Development
- Sustrans
- Tamworth North Consortium/Walton Homes
- Taylor Wimpey UK Limited
- The Ancient Tree Forum
- The Association of Inland Navigation Authorities
- The Co-operative Group
- The Crown Estate
- The Landor Society of Rugeley
- The Meynell & South Staffs Hunt
- The National Forest Company
- The Ramblers Association - Staffordshire Area
- The Theatres Trust
- The Tree Council (UK)
- The Trent Valley Bowls Club
- Thomas Eggar
- Thomas Vale Construction
- Trustees of St. John's Hospital
- Village Retail Services Association
- W M Morrison Supermarkets
- Waitrose Ltd
- Walton Homes Limited
- Waterloo Housing Association Ltd
- West Midlands HARP Planning Consortium

- K B Jackson & Son (Midlands) Ltd
- Kenton Manor
- Kingfisher Holiday Park
- Kingswood Homes
- Lafarge Aggregates Ltd
- Lambert Smith Hampton
- LCP
- Leavesley Group
- Leomansley Area Residents Association
- Lichfield & District Council Voluntary Services
- Lichfield & District Cycle Forum
- Lichfield & Hatherton Canals Restoration Trust
- Lichfield & Tamworth Chamber of Commerce & Industry
- Lichfield & Tamworth Liberal Democrats
- Lichfield Alliance
- Lichfield Aspergers Parent Support Group
- Lichfield Cathedral
- Lichfield Civic Society
- Lichfield Cricket and Hockey Club and affiliate clubs
- Lichfield Cruising Club 2000 Ltd
- Lichfield Islamic Cultural Society
- Lichfield Rail Promotion Group
- Lichfield Skatepark Association
- Lingfield Assets LLP
- Lingfield Plc (Harris Lamb)
- Lingfield Securities plc
- Lioncourt Homes Ltd
- Little Aston Community Association
- London & Cambridge Properties Ltd
- London Midland
- Loxton Developments
- Lyalvale Express Ltd
- MADE
- West Midlands RSL Planning Consortium
- West Midlands, NHS Property Services Ltd
- Wilson Bowden Developments Ltd
- Woodland Trust



- Make it Stoke on Trent & Staffordshire
- Maples Hayes Trust
- Marine Fabrications Ltd
- Marrons

As part of the consultation 1396 members of the public were consulted. Details can be provided on request.

# Appendix B

## Appendix B

### Historic Environment Supplementary Planning Document August 2015 – Summary of Representations

Name	Summary of the Main Issues	How those issues have been addressed
Alrewas Parish Council	<p>No specific comments to raise on the individual sections.</p> <p>Executive Summaries should be a key part of these documents providing a clear guide to the reader but we consider that the Executive Summaries, where they exist, are not in fact Executive Summaries and need to be improved considerably.</p>	An executive summary will be included in the final document.
Cannock Chase AONB Unit	<p>We welcome some references to the AONB at various points in the documents but consider that a more consistent treatment would properly recognise the (national) importance of the AONB in terms of planning policy and decisions. I make the following suggestions in the light of this comment.</p> <p>- That the AONB Management Plan (2014 -19) is referred to as policy context in each of the SPDs at the appropriate point(s).</p> <p>- That the AONB Partnership is listed in the “Further contacts” sections of each of the SPDs - Cannock Chase AONB Unit, Stafford Borough Council, Civic Centre, Riverside, Stafford ST16 3AQ Tel: 01785 619185 Email: <a href="mailto:cannockchase@staffordshire.gov.uk">cannockchase@staffordshire.gov.uk</a></p>	AONB to be added as a strength in the SWOT analysis.

	<p>- In the Historic environment SPD, in the SWOT (after 0.35) that the AONB is noted as a Strength, recreational and visitor pressure is noted as a Threat and partnership working is noted as an Opportunity. (The inclusion of a reference to the AONB in the Local Distinctiveness section (2.20) is welcomed).</p>	
<p>Framptons on behalf of Deanslade Park, Lichfield Consortium</p>	<p>The majority of the document cross references existing national and local guidance and standards, as well as archaeological and heritage datasets. In this sense, the SPD does not represent anything which has not already been considered in the heritage report for Deanslade Farm and in this sense are not considered unreasonable.</p> <p>The SPD makes general observations on the issues which need to be considered with regard to development proposals, of which the following are relevant to Deanslade Farm:</p> <ul style="list-style-type: none"> <li>• Larger settlements need to retain their identity whilst developing as major service centres;</li> <li>• The 5 spires skyline is listed as a ‘strength’ of Lichfield, in local identity and planning terms. It emphasises that the integration or retention of views of the city ‘will be important in most cases’;</li> <li>• There are a number of ‘opportunities’ with regard to new development listed on page 10,</li> </ul>	<p>Comments are noted and no changes required.</p>

	<p>including 'consolidate local character' and 'raise standards of design';</p> <ul style="list-style-type: none"><li>• There are also 'weaknesses' of new developments, including 'some characterless suburbs' and 'lack of high quality contemporary architecture'.</li><li>• There is an emphasis on new developments taking into consideration 'local distinctiveness'; e.g. the height and shape of buildings, and long distance views in the area; and 'local details'; e.g. skylines and the appearance of rooftops. Even outside of historic cores, a considered approach to design is expected to ensure no loss of local distinctiveness.</li><li>• Following from this, it includes brief 'style guide' examples for Lichfield and surrounding villages as an example of local character;</li><li>• The need for outlying developments to compliment the core of historic settlements is further emphasised by the statement that there is 'less value in having distinctive town or village centres ringed by anonymous, bland built up areas'. The SPD encourages good design for developments, regardless of their positions within settlements;</li><li>• Furthermore, the SPD states that 'it would normally be expected for design to be locally distinctive...on prominent sites at the edges of settlements...' and 'at settlement edges, new development should</li></ul>	
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	<p>harmonise with the wider landscape to aid transition from the built form to the adjoining countryside’;</p> <ul style="list-style-type: none"> <li>• There is a lot of detail on how new development needs to reflect local character, context and distinctiveness, but this is mostly repeating existing NPPF and Historic England guidance. 6.3 Whilst the SPD has clear implications for the development at Deanslade Farm the majority reflect best practice and are in this sense compliant with National Policy and the recently adopted LDC LP.</li> </ul>	
Health and Safety Executive	<p>We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, the HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard installations and MAHPs located in the area of your local plan.</p>	<p>The SPD does not allocate or identify any sites for development. Comments are noted and no changes proposed.</p>
Historic England	<p>Foremost we are very encouraged to see that the Council has produced a specific SPD for the Historic Environment and we welcome the addition of this document and the guidance it gives.</p> <p>We note a typographical error in paragraph 1.4 it should read ‘manner’.</p>	<p>Comments noted and all proposed changes will be adopted.</p>

	<p>Within paragraph 2.5 we would suggest the deletion of the term 'preserve' and the inclusion of the terms 'protect and conserve'.</p> <p>We recognise the reference to photographs within paragraph 2.14 although they have yet to be included. We support the use of photographs and visual aids to illustrate points made by the text and would welcome their inclusion within all the SPD's.</p> <p>Within paragraph 2.25 we would recommend that the term 'historic parks and gardens' is replaced with 'registered parks and gardens' to reflect the terminology within the NPPF. It would also be appropriate to have an assessment where any heritage asset may be affected by proposed development.</p> <p>Within paragraph 2.42 we would encourage a reference to the 'significance of heritage assets' as well as their setting.</p> <p>Paragraph 2.55 again we would recommend that the term 'historic parks and gardens' is replaced with 'registered parks and gardens' to reflect the terminology within the NPPF. It would also be appropriate to have an assessment where any heritage asset may be affected by proposed development. For example, what would happen</p>	
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	<p>if proposed development were to affect undesignated heritage assets such as those on a Local List or undesignated archaeology?</p> <p>We support the inclusion of paragraphs relating to Heritage Crime.</p> <p>We support the inclusion of paragraph 3.2 and the definition of heritage assets as well as an understanding of significance and setting and question whether this would be better as an introduction to the SPD rather than being included near the end of the guidance.</p> <p>We support the inclusion of a reference to Conservation Principles.</p> <p>We support the reference to GPA3 and request that the Council inserts the appropriate title of the document and also includes a reference to GPA2 which is also relevant for this SPD.</p> <p>We would request that the document references the importance of discussing issues with local and country conservation and archaeology staff at the earliest opportunity as well as utilising the Historic Environment Record.</p>	
Natural England	No comments	No changes proposed
Office of the Rail Regulator	No comments	No changes proposed
Staffordshire County Council	Section 0.1, line 6 – it is suggested that the broader historic landscape character (its intact	Comments noted and all proposed changes will be adopted.



field systems, woodlands and parklands) can also play a role when considering places/areas to visit and to live in. Historic Landscapes (urban and rural) play an important role in creating a unique 'sense of place'. Lichfield has a rich rural environment and I would advise that this is recognised within the SPD at this point.

Section 0.3, line 8-9 – it is suggested the inclusion (underlined) of the following '... when undertaking works which could impact upon the historic environment, heritage assets or their setting and particularly where designated heritage assets are concerned.' This introduces the concept of the Heritage Asset and also the setting of designated heritage assets.

#### Significance of the District's Historic Environment

Section 0.4-0.7 - This section might be the appropriate place to identify the various studies which have been referred to in the development of this document to include the Extensive Urban Surveys for Lichfield, Colton and Alrewas (available at [www.staffordshire.gov.uk](http://www.staffordshire.gov.uk)), the Historic Landscape Character, the Historic Environment Character Area study and the various Conservation Area Appraisals.

Section 0.5, line 5 – there is a typographical error. Amend to read (underlined) '...of the former Royal

Forest of Cannock which by the later 11<sup>th</sup> century was a...'

The Pen Portrait and subsequent more detailed consideration are to be welcomed as is the reference to the various SCC and LDC part-funded characterisation studies which have been carried out within the District.

Section 0.15 - The section which considers Hammerwich might also want to highlight the discovery of the Staffordshire Hoard just to the south of the A5 (Watling Street) in 2009. The reason for the burial of such a valuable treasure hoard may never be fully understood but its location close to the line of a Roman road, a route maintained throughout the Anglo-Saxon period and beyond might point to its rapid burial with the intention to return to reclaim at a later date. This evidence points to the Districts role in the Mercian kingdoms rich history both prior to and following its conversion to Christianity in the mid to late 7<sup>th</sup> century.

Section 0.19 - This section might also want to include the following information:

Settlement appears to have developed within areas of Lichfield during the early medieval period and possibly shortly after the end of formal Roman administration of the province (c.410AD).

	<p>Seventh century ecclesiastical foundations are known from St. Chads Church, Stowe and at Lichfield Cathedral; it is not known what impact the Danish incursions of the early 10<sup>th</sup> century had upon the churches and any settlement in the area.</p> <p>With the exception of medieval and post-medieval suburban development along the main roads entering the town, Lichfield does not appear to have developed outside its medieval defences until the 18<sup>th</sup> / 19<sup>th</sup> century.</p> <p>Section 1.30 - should this read '0.30'?</p> <p>Section 0.35 – There are also a number of Scheduled Monuments, Registered Parks and Gardens and buildings or structures recorded on the List of Locally Important Buildings maintained by Lichfield District Council. Figures for these should be included in the SPD.</p> <p><u>SWOT Analysis</u></p> <p><u>Opportunities</u></p> <p>An active local history society, the local museums and the links to the Staffordshire Hoard (elements of which have been displayed at Lichfield cathedral).</p>	
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Continued expansion of the Wryley and Essington Canal from Ogley Junction to Huddlesford Junction (now known as the Lichfield Canal) and the Hatherton branch of the Staffordshire and Worcestershire Canal under the auspices of the Lichfield & Hatherton Canal Conservation Trust.

## Section 2

There needs to be a clear statement as to what comprises the historic environment. Essentially this will encompass the Districts' archaeological heritage assets, its historic buildings and structures and its historic landscape character. Some assets will be designated, others will not, but all have a part to play in understanding the character of Lichfield District.

Section 2.2 - Features and qualities of a place may also include:-

- Varying types of field enclosure, different species mixes, the presence of hedge trees etc.
- The road network including green lanes and tracks.
- Surviving earthworks and boundary forms which give clues to past activities such as ridge and furrow, water meadows, quarries, reverse 's-shaped' field boundaries etc.

	<p>Section 2.3 - Details of a place might include:-</p> <ul style="list-style-type: none"><li>• Building styles (polite or vernacular), the presence of estate styles etc</li><li>• Mix of building periods or all one period (possibly indicating the impact of an historic calamity).</li><li>• The street pattern</li></ul> <p>Section 2.13 – typographical error. Insert (underlined) ‘The District covers <u>an</u> area with a varied...’</p> <p>Section 3.1 - Heritage Assets can be designated or undesignated. The Staffordshire Historic Environment Record (HER) maintains a data base of heritage assets for the District. Where designated Heritage Assets are concerned the Historic England National Heritage List for England can be consulted.</p> <p>This statement is very oriented towards historic structures. It should also state clearly that heritage assets can comprise below ground remains and provide evidence for past activity including prehistoric burials and ceremonial sites, defensive enclosures and the remains of past settlements.</p>	
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	<p>Section 3.3 - might also include Registered Battlefields although none are currently recorded within Lichfield District.</p> <p>Section 3.5. - A link to guidance on what information should be submitted by applicants is provided but I was unable to connect to it. I cannot therefore comment on the type of detail contained on this page. Heritage Statements are normally produced as part of Design and Access Statements; these statements should be proportionate to the significance of the heritage asset/s impacted. As a minimum NPPF para 128 advises that the Heritage Statement should consult with the Historic Environment Record (HER).</p> <p>Section 3.12. - This statement should also reference the Staffordshire Historic Environment Record (HER) which holds data on undesignated heritage assets within the District.</p> <p>Section 3.16. - Designated heritage assets are not just '...clearly of some heritage value...', they have been designated as being of national importance according set criteria. The SPD should clearly identify the status of such statutorily protected heritage assets so that applicants are in no doubt about there significance or the level of protection they enjoy.</p>	
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	<p>Section 3.17. - This section should also include reference to below ground archaeological remains.</p> <p>Section 3.18. - This section considers cumulative or group value. The example provided is of a building, this example could also include reference to the immediate and wider landscape in which it is located, associations with ancillary buildings and below ground archaeological remains.</p> <p>Section 3.31. - This section might wish to include further information on the planning process where evaluation/mitigation is concerned (see below):</p> <p>NPPF para 128 states that proportionate assessment (Heritage Statements) should be prepared in support of applications where they have the potential to impact upon heritage assets or their setting. Local Planning Authorities may also require the production of historic environment desk-based assessments where a scheme has the potential to impact upon archaeological remains and, where necessary, this should be supplemented by archaeological evaluation to support the planning application.</p> <p>Where a development proposal is deemed to be acceptable to the Local Planning Authority but</p>	
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there remains archaeological potential, NPPF para 141 advises that further archaeological mitigation may be required. This work would require developers to ‘...record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact.’

*Flood Risk*

We welcome section 2.78 and the intention for developments to “Integrate existing water features, rivers, becks and ponds. Or incorporate open areas of water, potentially as part of a sustainable drainage scheme with swales and basins in rural areas or edge of settlement locations. Or in urban areas in a formal setting; fountains or other designed water features.