Brereton Neighbourhood Plan (modification) Regulation 16 Modification Statement Consultation

The Coal Authority

For the attention of: Neighbourhood Planning Team Cheshire East Council

[By email: neighbourhoods@cheshireeast.gov.uk]

30 September 2026

Dear Neighbourhood Planning Team

Re: Cheshire East Council - Brereton NP (modification) Regulation 16 Consultation

Thank you for your notification of 30 September 2026 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Yours

The Coal Authority Planning Team

David Barton

To whom it may concern,

Please find attached my PDF Umbrella Representation which comprises a key part of my submission for the aforementioned Broxtowe Local Plan Scoping Consultation. Please note that my accompanying PDF Document comprises a key part of my full submission requires publication.

Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with

reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse.

Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise.

Historic buildings should be duly reconstructed authentically as they were.

Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Cheshire Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.

I look forward to hearing from you soon.

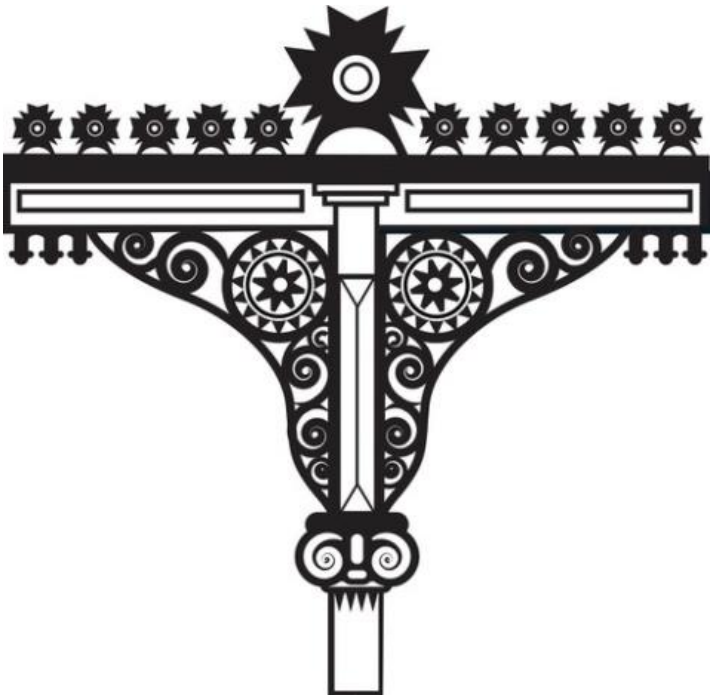
Yours Faithfully

Community Campaigner David Barton

UK & IRELAND PLANNING CONSULTATION(S)

Stage: Universal Representation

Sections: Conservation Area Appraisal(s), Scoping Document(s), Local Plan, Supplementary Planning Document(s)



Consultee	**David Barton**
Role:	**Community Campaigner- Civic Heritage**
Section	**Conservation Area Appraisal(s), Scoping Document(s), Local Plan, Supplementary Planning Document(s)**
Interest	**Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture**

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Acronyms / Abbreviations

LA	Local Authority
SPD	Supplementary Planning Document
TVA	Traditional Vernacular Architecture
TA	Traditional Architecture

Introduction:-

Context:

This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.

This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.

Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.

It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.

*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.[i.)] Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.

Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architecture[ii.)] who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.

Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.

References to supporting documents are contained in the indented blue numbering.

This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.

Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.

Community Campaigner David Barton:

Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.

Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.

Mr. Barton should like to credit and thank the leading professionals and organisations that continue to support his TVA endeavours including:

1) **Mr. Francis Shaw- Shaw & Jagger Architects**
2) **The King's Foundation**
3) **Create Streets**
4) **Francis Terry & Associates**
5) **The Institute for Traditional Architecture**

This Submission is supported by the following appendices:

i) Appendix i): Academic Perspective on Traditional Architecture by Mr. Francis Shaw of Shaw & Jagger Architects (PDF)

ii) Appendix ii.) Written Endorsement from Mr. Joseph Jutras of The Institute of Traditional Architecture (PDF)

1. Appendix 1: Sefton Climate Emergency Strategy Climate Emergency Strategy
2. Appendix 2: Sefton 2023/2024 Climate Report modgov.sefton.gov.uk/documents/s124335/Climate+Emergency+Annual+Report+2023-2024+final.pdf
3. Francis Terry & Associates- The Secrets of Popular Architecture https://www.ftanda.co.uk/thoughts/secret-of-popular-architecture/
4. Appendix 3: PAS Guide to better Sustainability Appraisal PAS Guide to better Sustainability Appraisal | Local Government Association
5. Appendix 4: Sefton Council Annual Air Quality Report 2024 air-quality-status-report-2024.pdf
6. Francis Terry & Associates- Natural Architecture Discussion https://www.ftanda.co.uk/thoughts/natural-architecture/
7. Francis Terry & Associates- Sustainable Architecture Discussion (VIDEO) https://www.ftanda.co.uk/thoughts/what-is-sustainable-architecture/
8. Francis Terry & Associates- Can Beautiful Homes be built in a Factory? https://www.ftanda.co.uk/thoughts/beautiful-homes/
9. Create Streets- Design Codes Explanation design codes
10. Create Streets- Bootle Christ Church Project Bootle with Safe Regen
11. The King's Foundation- Officer's Mess Design Guide Rutland (PDF)
12. Create Streets- Lichfield Design Guide- Lichfield
13. Create Streets- Chatham Design Guide- Chatham

14. Create Streets- Street Assessment Service
Street Assessment - Create Streets
15. Create Communities Mapping Platform
Create Communities mapping platform - Create Streets
16. The King's Foundation- BIMBY Toolkit
Puts the power in your hands to influence new buildings in your area.
17. Francis Terry & Associates- Poundbury Discussion
https://www.ftanda.co.uk/thoughts/poundbury/
18. Institute of Traditional Architecture- Urban Planning
Urban Planning – Institute of Traditional Architecture
19. Heritage and the Economy | Historic England
20. The Economic Value of the Heritage Sector | Heritage Counts | Historic England;
21. Investing in Heritage to Avoid Embodied Carbon Emissions | Heritage Counts
22. Historic England;
23. The Embodied Carbon Emissions of Construction and Retrofit Materials for Traditional Buildings | Historic England
24. InYourArea- Community Campaigner David Barton- Placemaking Principles 2021
'Placemaking' is key to the future for Southport claims campaigner
25. InYourArea- Community Campaigner David Barton- Role of Traditional Town 2021
The role of the traditional town 'key' to Southport's future
26. Living with Beauty Report Example 76, Page. 177
Living with beauty: report of the Building Better, Building Beautiful Commission
27. InYourArea- Community Campaigner David Barton- Green Action Plan 2021
Former Councillor proposes climate change plan
28. InYourArea- Community Campaigner David Barton- Hedgerow Planting Benefits 2021
Campaigner calls for more green spaces in Southport
29. Benefits of Greenery Planting- The Guardian 2010
https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house
30. Francis Terry & Associates- Glad to be Pastiche Discussion
https://www.ftanda.co.uk/thoughts/glad-to-be-pastiche/
31. Francis Terry & Associates- What is more important, Materials or Form?
https://www.ftanda.co.uk/thoughts/rotonda-in-cheese/
32. InYourArea- Community Campaigner David Barton- Lathom Hall Seaforth
https://www.inyourarea.co.uk/news/restoration-of-seaforth-beatles-landmark-club-a-breakthrough-in-combatting-climate-crisis

Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture:

SECTION 1: Design Codes:-

1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished

prized old buildings beloved by the community, such as community pubs, libraries and community centres.

11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.

12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.

SECTION 2: Designated & Non-Designated Heritage Assets:

1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the

societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.

8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.

SECTION 3: Conservation Areas:-

1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.

9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.

SECTION 4: Climate Change:-

1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially

again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.

6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.

7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.

8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.

9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.

10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.

SECTION 5: Historic Buildings:-

1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.

10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.

SECTION 6: Traditional Vernacular Architecture:-

1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.

8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.

SECTION 7: Making an application:-

1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and

Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.

7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of "Urban Explorers" who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).

SECTION 8: MISCELLAENOUS:-

1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.

8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

National Highways

FAO: Cheshire East Council

Given the scope of the proposals and the minimal impact to the SRN, National Highways would not look to comment further.

Kind regards,

Danielle

Danielle Mensah, Assistant Spatial Planner (Cheshire & Merseyside)

Historic England

Dear Neighbourhood Planning Team,

Our ref: PL00801258

Date: 01/10/2026

Neighbourhood Planning Brereton (modification) Regulation 16 Consultation

Thank you for consulting Historic England. As the public body that advises on England's historic environment, we are pleased to offer our advice.

Having considered the information provided within your email dated 30 September 2026, including the 'modification statement', we can confirm that we do not have any comments to make.

Thank you once again for providing Historic England with the opportunity to comment.

Yours sincerely,

Emma Grange

Historic Places Regeneration Advisor

Emma.grange@historicengland.org.uk

Bob Douglas

Dear Neighbourhood Planning Team,

Many thanks for your E-mail about the document omitted "Modification Statement."

As long as all the documents, including the Modification Statement, make it absolutely clear that Brereton Heath including Brereton Heath Lane and Moss Lane are classified as "Open Countryside" status, which has the support of 90% of the houses that responded to the Neighbourhood Consultation, then I am happy and have no other comments to make.

Many thanks

Best wishes,

Robert

Graham Dellow

With reference to your email dated 30th September 2026

As long as Brereton Heath remains 'as is' i.e. without a settlement boundary and therefore in 'open countryside', I am content.

Graham Dellow