

21 October 2019

East Suffolk Council – Historic Environment SPD consultation

The Society has the following comments on what information should be included and how the information should be presented. These will be submitted via the online consultation portal.

1. Does the proposed contents list below cover all the topics that should be included in the Historic Environment SPD? In addition which topics should be included within each chapter?

Although this is a Historic Environment SPD the introductory paragraph suggests that the guidance is solely about changes to historic buildings. The document should include all aspects of the historic environment and the introduction should make this clear. The introduction should set out that the historic environment includes:

- designated heritage assets: listed buildings and their settings; conservation areas; scheduled ancient monuments; registered parks and gardens.
- non-designated heritage assets: buildings, monuments, sites, places, areas or landscapes identified as having a degree of local significance (including historic landscapes and locally listed parks and gardens)

Guidance should be included on:

- development within the setting of a listed building and the potential impact on the asset's significance
- the Conservation Area chapter should explain the purposes of the designation and that development should conserve or enhance the character of the conservation area. New buildings, signage, lighting, boundary treatments, changes to open spaces, as well as alterations to listed and unlisted buildings, can all impact the character of a conservation area
- SPS urges that this local policy document includes a requirement for the design and location of highway works, public realm signage, street lighting and street furniture to respect the historic environment

2. Should the above information focus on what is acceptable in terms of planning policy and decisions about planning applications, or should it include practical guidance about repairs and alterations to the historic environment as well?

NPPF para 185 requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment. Guidance should therefore encourage development to make a positive contribution to, or better reveal the significance of, a heritage asset, or reflect and enhance local character and distinctiveness. The SPD should therefore aspire to achieve the best outcomes for the historic environment rather than focusing merely on what is acceptable. The guidance should also include practical information on changes to the historic environment as suggested.

3. Should it provide links to other organisations' websites to obtain further information? This includes East Suffolk Council department websites such as Building Control.

Yes including the East Suffolk conservation and design team as well as Historic England, SPAB, Victorian Society; Georgian Society; 20th Century Society, Ancient Monuments Society. Links to Historic England's guidance notes on setting and significance of heritage assets should also be included.

4. Should the SPD include historical contextual information or should this be left out?

No this is better dealt with on a case by case basis using Conservation Area Appraisals, Historic Environment records and Heritage Assessments submitted to support applications.

5. Do you find the use of illustrations helpful in understanding planning and the historic environment?

Yes – incorporating examples of good and poor practice.

6. Which of the below sections would most benefit from illustrations?

No comment

7. Please let us know if you have any other comments.

SPS considers that the document should be positively prepared to encourage those undertaking development that may impact the historic environment to engage at an early stage with the local authority and relevant bodies. We also have the following specific points:

- The parks and gardens section should also include reference to Registered Parks and Gardens
- local parks and gardens should be noted under the non-designated heritage assets section

- The adopted criteria set out by Suffolk Coastal DC should be used to identify further NDHAs across the East Suffolk area rather than the Waveney local lists which are limited to within conservation areas.