

## Friends of Lewes

### **CONSULTATION PAPER ON A NEW PLANNING POLICY STATEMENT 15: PLANNING FOR THE HISTORIC ENVIRONMENT**

The Friends of Lewes society is the civic society for Lewes, in East Sussex. The society has over 500 members. We welcome the opportunity to comment on this draft PPS.

The Society accepts that there is a case for up-dating and unifying the current system of protection for the historic environment. However, we are concerned that the creation of a single list of Heritage Assets (HAS) will cause confusion, particularly as there would no longer be a distinction between buildings and archaeology. A protected wreck site is not the same as a Grade I listed building, although they may be equally important.

We do not consider that the term 'Heritage Asset' is one that the general public will find meaningful whereas a battlefield (such as the site of the Battle of Lewes) or an ancient monument (such as Lewes Castle) are terms that are understood. On the other hand, we welcome the general approach that treats the historic environment as an 'asset' in the planning system rather than as an impediment.

We find it disappointing that CLG considers that the protection of our historic environment can be dealt with in just 10 pages of substantive policy in a 72 page document. Whilst not advocating a repeat of the previous PPG 15 and 16, we consider that much fuller guidance is required on the components of the historic environment. Whilst the draft Planning Practice Guide from English Heritage is welcomed, it does not constitute national planning policy.

Our detailed comments in response to the questions in the draft follow:

#### **1. Does the PPS strike the right balance between advocating the conservation of what is important and enabling change?**

We welcome the general approach that heritage should be viewed as an asset rather than a burden to development. Particularly in a town like Lewes, it provides an important anchor for new development. However, in practice it is inevitable that some developers will continue to view the historic environment as restricting the opportunities for financially viable development.

It is good that local planning authorities will be encouraged to gauge public views on whether a potential heritage asset has significance to the local community. However, a clear distinction will be needed to be made between buildings and features that have genuine architectural and historic value and those that are appreciated merely because they are familiar.

Paragraph HE3.2 says that "the historic environment should be seen as a stimulus to inspire new buildings of imaginative and high quality design...." We concur with this view but, certainly in this town, the public lacks confidence that new development will be in any way better than what it replaces.

#### **2. By adopting a single spectrum approach to historic assets, does the PPS take proper account of any differences between types of asset (eg. are archaeological assets adequately covered)?**

The present system for the protection of the historic environment has evolved over time and there are inconsistencies in it. Nevertheless, this system is established and people are used to making it work. A single spectrum approach should be a significant improvement.

However, the present proposal fails to take full account of the differences between the various types of assets.

**3. In doing so, does the PPS take appropriate account of the implications of the European Landscape Convention, and of the cultural dimensions of landscapes designated as National Parks and Areas of Outstanding Natural Beauty?**

Lewes is set within the South Downs and will soon lie within a National Park. The Downs are covered with burial mound, field systems, lost villages and trackways. The trackways along the ridges of the Downs converge on Lewes as the natural crossing point of the River Ouse. The present draft PPS does not take adequate account of such complex layers of landscape and history in the rural and urban environment.

**4. Are the policies and principles set out in the PPS the key ones that underpin planning policy on the historic environment, or should others be included?**

The general policies and principles set out in the PPS are sound. It is the lack of fuller guidance on their application in relation to the different components of the historic environment (Historic Parks and Gardens, Listed Buildings, Conservation areas, and so on) that is the problem

A particular concern of this Society is the approach of the county council (as highway authority) to the replacement paving, street lighting and other street furniture within Conservation Areas. In general, the cheapest option is selected rather than materials or equipment that help to conserve or enhance the historic fabric of the town.

**5. Do you agree that it is the "significance" of a historic asset that we are trying to conserve?**

Yes, although the nature and extent of significance of a particular asset may be open to debate.

**6. Does the PPS comply with devolutionary principles with regard to what is expected at regional and local levels?**

If it is 'devolutionary principles' that has led to lack of lack of fuller guidance, then the principles have been misapplied.

**7. Does the PPS strike the right balance between the objectives of conserving what is significant in the historic environment and mitigating the effects of climate change?**

People have always sought to 'improve' what we now regard as 'historic' buildings, and which we now seek to protect. There are numerous examples in Lewes of mediaeval buildings which were refaced with mathematical tiles to give them what would then have been regarded as a more modern appearance. It is both in the national interest and in the interests of building owners to improve the thermal characteristics of historic buildings and mitigating the effects of climate change. Whilst the installation of standard double glazing units will improve the energy efficiency of a listed building, they are likely to be detrimental to the character and historic interest of that building. Much more research is needed into ways of improving historic buildings.

**8. Does the PPS make it clear to decision-makers what they should do, and where they have more flexibility? Are there any risks or benefits you would like to highlight for the historic environment sector?**

The draft PPS gives little guidance on how 'significance' is to be assessed. The various guidelines that are currently being produced by English Heritage should help, but some local planning authorities lack the expertise to determine the significance of the wide variety of different asset.

We welcome the support in paragraph HE5.1 for removing permitted development rights in conservation areas. However, this must be accompanied by the appropriate advice both on the drafting of Article 4 Directions (so that they not restrict permitted development rights unnecessarily) and on subsequent enforcement. The recent English Heritage publication 'Conservation Areas at Risk' has highlighted concerns regarding the lack of enforcement of existing Article 4 directions in conservation areas.

**9. The draft PPS highlights the importance of ensuring that adequate information and evidence bases are available, so that the historic environment and the significance of heritage assets are fully taken into account in plan-making and decision-taking. At the same time we are concerned to ensure that information requirements are proportionate and do not cause unnecessary delays. Are you content we have the balance right? If not how would you like to see our policy adjusted? (Policies HE8 and HE9 are particularly relevant to this question.)**

We are concerned that the requirement for an applicant to provide a description of the significance of a Heritage Asset could lead to the applicant downplaying the significance in order to increase the chances of approval.

Paragraph HE9.9 refers to deliberate neglect of a heritage asset in the hope of obtaining consent. This is far too brief. More guidance is required on what constitutes "deliberate neglect", and the action that a local planning authority can take.

**10. In your opinion is the PPS a document that will remain relevant for at least the next 20 years? Do you see other developments on the horizon that have implications for the policies set out in the PPS?**

In its remains in its present form, the PPS will prove inadequate and have to be revised.

**11. Do you agree with the conclusions of the consultation stage impact assessment. In particular, have we correctly identified and resourced any additional burdens for local planning authorities? Is the impact on owners/developers correctly identified and proportionate to their responsibilities?**

No comment.

**12. Do you think that the policy draft PPS will have a differential impact, either positive or negative, on people, because of their gender, race or disability? If so how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.**

The PPS will have differential impacts, but not because of their gender, race or disability.