

# East Suffolk Council – Consultation on Draft Historic Environment Supplementary Planning Document

## Note by PAG

### 17.01.21

The draft consultation document produced by ESC contains 18 chapters, each addressing a topic relating to the historic environment. This document, which will become a 'Supplementary Planning Document' (SPD) once approved will then be a material consideration in the determination of planning applications.

The draft document has likely arisen as a result of the former SCDC and WDC having very different approaches to Conservation Areas, unlisted buildings and the placing of Article 4 directions on Conservation Areas. The document seems to be an attempt to provide some consistency within the new authority area, and much of the information presented has been gleaned from the Management Plans that accompany each of the ESC Conservation Area appraisals, and recent research and policy produced as part of the North Lowestoft Heritage Action Zone (HAZ).

PAG have reviewed the draft document and provide comments below on each section (using the numbering and headings contained in the document). Any points potentially requiring clarification are in bold:

#### 2. Listed Buildings

Walberswick has relatively few listed buildings (ten, if you include the windmill on Westwood Marshes). The protection of these structures is governed by national planning policy.

The document provides a sound assessment of the process and implications of altering listed buildings, including the penalties for unauthorised work.

There is nothing within this section to cause concern, and the details are in line with national policy.

#### 3. Conservation Areas

It is pleasing that the document contains reference to landscapes and setting in relation to Conservation Areas (something WDC were better at accepting than SCDC). This is a welcome new approach and something to keep in mind when it comes to the review of the Walberswick Conservation Area (see later).

**Disappointingly section 3.3 does not fully address the Local Authorities requirement to review and update Conservation Area appraisals (see Historic England Advice Note 1, Second Edition, 2019). While the advice note mentions a review should be done 'from time to time' (this wording has been adopted for the ESC document) Historic England go on to state on p39 of their document "*Resources permitting, every five years is ideal, but review frequency will vary according to the development pressures in the local area*".**

## **The Walberswick Conservation Area was last reviewed in 2013.**

Section 3.5 is perhaps the most relevant part of the document for Walberswick, and it covers 'Article 4 directions'. This is a piece of legislation that can be applied to a Conservation Area to remove permitted development rights. WDC applied them to all Conservation Areas, and the former SCDC area has none. Part of Walberswick village (essentially the car park, structures and part of the quay) is within the Southwold Harbour and Walberswick Quay Conservation Area, and as this exists in the former WDC area this part of the village has an Article 4 direction.

**The draft document does not make it clear whether further Article 4 directions will be applied to areas within the former SCDC area or not. Guidance from ESC would be welcome.**

PAG has felt for several years that an Article 4 direction covering the Conservation Area would help reduce the number of small changes that occur, which collectively add up to considerable change.

## **4. Non-Designated Heritage Assets**

These are structures or landscapes that have local significance, and while they may not be nationally listed they are afforded protection at a local level. The Walberswick Conservation Area appraisal contains a list of buildings that contribute positively, and it is likely the majority of these structures would meet the criteria for non-designated heritage status (ESC's criteria for determining if a structure meets the criteria for NDHA is helpfully contained within appendix 1 of the document).

This is a positive step by ESC to provide clarity regarding non-designated heritage assets.

## **5. Historic Parks and Gardens**

SCDC formerly had some resistance to parkland and larger gardens / green spaces being included within Conservation Areas (WDC were more open-minded) so this acknowledgement of significance is welcome. However, this section relates to large designed landscapes, often associated with a country house, and as it stands is not entirely relevant to Walberswick.

**However, it would be helpful if ESC acknowledged the importance of domestic gardens and the positive impact they have within a conservation area, as well as the setting of a Conservation Area.**

## **6. Buildings – general principles**

Sound comments and advice regarding the repair and conservation of historic structures. Section 6.3 is particularly relevant as it concerns the need for an application to demonstrate an understanding of the significance of the asset being worked on. In theory this should lead to higher quality applications.

## **7. Sustainable Energy and Construction and the Historic Environment**

During 2019 ESC declared a 'climate emergency' and that ESC would be carbon neutral by 2030. It is therefore useful to see the measures being employed at a planning level to help achieve this important and ambitious target.

However, blanket policies are often difficult or inappropriate to impose on a historic building. The discussion regarding insulation is useful, and the comments about solar panels, photo voltaic cells, heat pumps, biomass, wind turbines and large-scale energy projects are all relevant to the village, and it is useful to have the criteria and restrictions highlighted.

## **8. Extending an Historic Building**

This section is important. Fortunately it is written with the desire to protect the significance of heritage assets.

8.6 suggests that extensions should be built from materials which match the main building, or compliment it. All works to a historic building should compliment it, so this point is almost not worth stating.

Mention is made under section 8.10 regarding the importance of the setting of an asset, which is welcome.

8.11 and 8.12 detail the importance of professional advice and the need to understand the significance and impact of the work proposed. This is welcomed and is useful to have stated in this document.

The section covering Materials and Details is a brave attempt to cover a complex subject.

8.18 concerns windows and this has great relevance to Walberswick, which has seen its building stock eroded through poorly detailed replacement windows.

8.25 (Dormer Windows and Rooflights) is again something that is highly relevant for Walberswick, and the tentative restriction for the number of these features on one elevation is limited to one, or at the most two. It is helpful to have this and the general promotion of better design and detailing.

8.27 to 8.31 (Scale and Proportion) makes many comments that could be drawn on when looking at planning applications within the village.

8.34 to 8.38 (Small Dwellings) is an important section as it details the significance of modest buildings that have not yet been extended. This is (or was) relevant to Walberswick and these sections will be helpful when it comes to determining works affecting smaller structures.

8.49 to 8.59 (Garden Rooms and Glazed Infills) is another section which is very relevant to Walberswick, and here ESC have gone to some lengths to spell out criteria for such additions. While this cannot cover every eventuality, the positive here is that ESC are accepting the need for control and scrutiny, and the harm that can be caused by poor design. There are certainly buildings in Walberswick where sections 8.34 to 8.59 would have been usefully taken into account when assessing their proposals.

## **9. The Setting of Historic Buildings**

This section is relevant to the listed and non-designated structures in Walberswick, and the document makes provision for assessing the impact garages, cart lodges, sheds, home offices and annexes can have. Additionally this section also looks at the potential impact walls, driveways and hard standing, fences, railings and gates can have, and contains useful advice regarding setting and the need for quality.

## **10. Windows, Doors and Porches**

10.1 is particularly relevant to Walberswick. Without an Article 4 direction removing permitted development rights, unless a structure is listed then these alterations can be made without consent.

This section contains further detail regarding dormer windows and rooflights, doors and porches, and criteria for assessing their significance.

## **11. Conversion of Historic Buildings in the Countryside for Residential Use**

Essentially this section relates to the conversion of agricultural buildings in open countryside, and is not particularly relevant to Walberswick. However, the sections regarding whether a building is redundant, local distinctiveness and design principles are useful points.

## **12. Lighting, Security and Satellite Communications Apparatus**

12.10 and 12.11 (Lighting) clarifies that if a building is not listed then domestic alterations will not normally require consent, however 12.11 usefully states that particular care should be given regarding lighting in a Conservation Area. This is helpful, particularly in Walberswick where light pollution is generally low.

The sections about lighting and also security apparatus are both detailed and useful.

## **13. Shopfronts and Signage**

Generally, business premises in a Conservation Area do not have permitted development rights, so changes to shopfronts and signage would require planning consent.

This very detailed section draws on the North Lowestoft Shopfront Guide, and while it perhaps is aimed at towns there are sections relating to alarms, canopies, blinds, accessibility, signage and illumination that are relevant to Walberswick.

## **14. Demolition**

Demolition of a listed building is hopefully not something that will be proposed in Walberswick, but the document makes it clear the process in relation to the National Planning Policy Framework.

The section detailing demolition of a non-designated heritage asset is more likely to be something encountered in the village, and sections 14.5 to 14.13 are extremely helpful in clarifying the process and criteria, as well as the need to understand the significance of the structure and the impact loss would have.

## **15. Repairs and Maintenance**

This is a comprehensive section that is highly relevant to Walberswick. While it is impossible to detail every circumstance, what this sections clarifies is the need for a sensitive and informed approach.

Section 15.9 usefully clarifies that certain repairs or alterations may require planning or listed building consent, and expresses the need to obtain professional advice if the structure is located in a conservation area or if it is listed.

**The section regarding trees (15.28 to 15.31) could usefully be expanded to cover the protection afforded to trees over a certain height / girth in a conservation area.**

Overall this section highlights some sound repair principles, which if adhered to would help safeguard the heritage assets of the village and prevent well-meaning but inappropriate repairs.

## **16. Pipework and Services**

A section containing sound advice and attempting to limit the inappropriate routing of pipework across the elevations of buildings. It also makes suggestions about the appropriate use of materials which is beneficial.

## **17. Chimneys**

The removal of chimneys from a historic building can be detrimental to the appearance and significance of the structure. Usefully, this section also makes recommendations about new chimneys, which in a historic environment can be important features of a proposal.

## **18. Making an Application**

This section is highly relevant, and if adhered to would result in higher quality applications being submitted. The need to understand significance and impact is discussed at length.

**Helpfully the section makes clear the importance and value of a Heritage Appraisal and a link directs readers to the ESC validation list for applications, but this would be better included within the document, perhaps in this section or within the appendix.**

## **Conclusion**

This is an ambitious document, and one that contains many clarifications that apply to Walberswick. Once adopted this Supplementary Planning Document will be a useful tool for the Parish Council and Planning Advisory Group.

The areas in bold (above) could be enhanced or clarified by ESC, but essentially the document is thorough and attempts to provide advice and make clear the standards required by ESC.

However, while the draft document brings together various existing standards required by local and national planning policy, particularly with regard to alterations affecting listed and

non-designated heritage assets, these standards are not always upheld or enforced at an application / decision making level. It is therefore hoped that this draft SPD will lead to increased awareness and understanding from those preparing applications, and those assessing them.

Finally, what this draft document also achieves is to raise awareness regarding Conservation Areas, particularly the need for periodic review and the question of whether Walberswick would be well-served by an Article 4 direction. The inconsistency that a small part of the village has an Article 4 direction and lies within a different Conservation Area, coupled with the change that has occurred within Walberswick since the last Conservation Area Appraisal review, could be seen by the Parish Council as issues that it would now be timely to raise with ESC.