

Table of Responses to representations on draft Architectural Features SPD

Respondent	Summary of Main Comments	Response to Main Comments
English Heritage	An ambitious initiative but a worthwhile document. Support the SPD in principle but it is not clear exactly what the document's function will be, whether purely a policy document, a technical handbook or information leaflet.	Agreed that the function of the draft SPD was not entirely clear. This has been resolved by producing a slimmed-down 'policy only' document that is aimed at being primarily a planning policy document.
	The general principles repeat much national and English Heritage guidance and may therefore not be necessary.	This section has been revised to address this and focus more clearly on the local context. However, it is considered that some reference to national policy remains useful.
	Clear formatting with paragraph numbers would help readability.	Agreed. Numbering has been introduced.
	Too much repetition in the document.	The slimmed-down version of the SPD has removed unnecessary repetition.
	The document would greatly benefit from more detailed illustrations that are locally specific.	Agreed. More illustrations have been added.
	The text in each section should also be more locally specific.	Agreed and the text has been revised to achieve this as far as possible.
	The key principles for the policy on facadism and reasoning need to be set out clearly.	This paragraph has been deleted as it was not considered to be helpful.
	May be dangerous to state that like-for-like repairs never require Listed Building Consent.	The SPD does not state this. Nevertheless it is accepted that the advice on this subject could be more clearly worded and the relevant paragraphs of the Introduction have therefore been reworded.
	Various other detailed suggestions.	These largely relate to matters of guidance on materials, repair and restoration and will be

		addressed in future separate documents where appropriate.
The Brighton Society	Welcome the SPD and support the overall terms of the draft document.	Noted.
	The term 'historic building' should be defined.	Agreed. A definition has been included.
	The need for planning permission in conservation areas should be clarified.	This is not the appropriate document to explain in detail the need for planning permission. This is a complex subject and depends upon a number of factors, which need to be considered in each case.
	The inclusion of statements on embedded energy is welcome and highlights the wastefulness of demolishing historic buildings.	Noted.
	The guidance on reinstatement should be amended to allow for reinstatement of the original appearance, especially in uniform terraces	No change. The wording of the paragraphs on reinstatement already allows for this.
	The policy on lime-based render in conservation areas is unduly restrictive and unrealistic.	Agreed. The policy wording has been amended.
	Well designed steel railings should be allowed as cast iron railings are not affordable.	No change. This requirement applies only to listed buildings and is considered to be necessary.
	There should be a policy of inspection during construction works for property with valuable architectural features.	No change. This is not a policy issue.
	Various other detailed suggestions.	These largely relate to matters of guidance on materials, repair and restoration and will be addressed in future separate documents where appropriate.

The Kemp Town Society	Welcome the SPD and consider it an important document for improved conservation guidance. The content, structure and detail are commendable.	Noted.
	Additional guidance should be produced aimed at owners of historic buildings.	Agreed. Additional publications will be produced in due course aimed at owners of historic buildings.
	Conservation considerations should take precedence over other legislation and requirements that may be harmful to historic buildings.	No change. This is outside the remit of local authority policy.
	There should be greater explanation of the need for Listed Building Consent.	The paragraph on the need for Listed Building Consent has been removed as this is already covered in an existing Supplementary Planning Guidance note (SPG) on Listed Buildings.
	The SPD should be illustrated with more 'before and after' photographs.	Additional photographs have been included.
	The SPD should include policy guidance on satellite dishes, solar panels and painting.	Existing SPGs and a Planning Advice Note (PAN) already exist on these subjects and that guidance does not need to be repeated here.
	Various other detailed suggestions.	These largely relate to matters of guidance on materials, repair and restoration and will be addressed in future separate documents where appropriate.
Montpelier & Clifton Hill Association	Trickle ventilation should not be necessary in timber sash windows.	No change. Trickle vents can sometimes be acceptable where concealed. An appropriate compromise with the Building Regulations in necessary wherever possible.
	Brick paving in courtyards should be mentioned.	Agreed. Text amended.
	The SPD should include policy on flues,	Partly Agreed. This is already covered by the

	particularly for wood burning stoves, which are becoming increasingly common.	policy on 'Miscellaneous Minor Additions' but further wording has been added.
Rottingdean Preservation Society	In general welcome the intention behind the document. Consider the present draft is substantial and strikes the right balance.	Noted.
	Would support more illustration in the final SPD.	More illustrations have been added.
	The advice on flint work is most useful.	Noted.
Save Hove	The creation of this very substantial SPD is to be welcomed. Would be pleased if it went even further, giving more examples and photographs of required practice.	Noted.
	Question the use of the word 'enhancement', as this is a euphemism for extension and change.	No change. The word 'enhancement' is an established term in conservation legislation and national policy and its meaning is explained in the SPD. Some change can positively enhance a historic building.
	The word 'must' should replace 'should' in policy guidance wording.	Agreed. The wording has been changed and made consistent.
	The section on Retention of Historic Buildings is ambiguous with regard to the need for consent. Even minor demolition should never be acceptable.	This section has been deleted as it simply repeated national policy and existing Local Plan policy.
	Object to the policy on facadism. Retaining only the façade is not false historicism.	This paragraph has been removed as it was not considered to be helpful.
	Problems of long term stability are structural engineering and survey problems, not planning issues.	No change. They are material considerations when considering proposals for demolition, partial demolition or major alterations to a historic building and the impact of the works needs to be understood at an early stage.

SEEDA	No comments to make.	Noted.
The Theatres Trust	Have read the document with interest but no comments to make as not directly relevant to our work.	Noted.
DMH Stallard	The Introduction to the document blurs important legal and practical distinctions between buildings in different categories.	Partly agree. The Introduction has been amended to clarify the distinctions.
	Terminology in the Introduction should be consistent when referring to historic buildings.	The terminology has been checked for consistency.
	Whilst there may be a presumption in favour of the retention of locally listed buildings in conservation areas, this should not be a “strong” presumption, nor should proposals for demolition be subject to such severe tests as are set out. In considering proposals for demolition both the architectural merits and wider merits of the replacement building should be taken into account.	This section has been deleted as it simply repeated national policy and existing Local Plan policy.
	The simplistic statement on sustainability seems to overlook or ignore the likelihood that areas of old or relatively low density development in the city will need to be redeveloped at higher density and that such new development is likely to meet stringent sustainability criteria.	No change. This wording is consistent with emerging national policy in the draft Planning Policy Statement 15 and the SPD has been subject to a statutory Sustainability Appraisal. Decisions on which areas of the city may be redeveloped at higher density are a matter for strategic policy in the Core Strategy.
	Stringent tests which would properly apply to listed buildings should not be applied to constrain alterations to unlisted buildings, except insofar as it can be demonstrated that	No change. The SPD contains separate policies on ‘listed buildings’ and ‘conservation areas’ and those on ‘conservation areas’ are less rigorous, in accordance with national policy on

	these fulfil a significant function in terms of e.g. maintaining design uniformity. It is particularly important that works should be permitted to improve sustainability and to facilitate changes of use.	significance. Policies take a holistic approach to environmental sustainability.
Graeme Hawkins, Miller Bourne Architects	With regard to demolition, the policy wording gives carte blanche to a planning officer to make a judgement which could be used to prevent many good new developments. Suggest a re-wording or omit this altogether as there are other policies controlling demolition.	This section has been deleted as it simply repeated national policy and existing Local Plan policy.
University of Sussex Estates Dept.	The policy as worded would not allow the flexibility currently in operation to discuss each issue as it arises, in respect of the University's listed buildings. Suggest that the document makes clear that it applies to 'pre-war' listed buildings.	No significant change. The Introduction already makes clear that the SPD is intended to apply to the city's typical Regency, Victorian and Edwardian buildings. Separate, specific guidelines are in place covering the University's 1960s listed buildings.
Colin Bennett	With regard to windows it is very important that the two subjects of conservation and thermal insulation of the existing housing stock are married up.	No significant change. The SPD covers already these issues in tandem and strikes an appropriate balance.
Stuart Derwent	Supports the principles of the document. But is should include policy on solar panels, photovoltaic tiles and wind turbines.	There is an existing Planning Advice Note (PAN) on Microgeneration that covers these issues.
Nick Tyson, Regency Town House	Would have liked to have been invited to collaborate in the production of the document.	Noted. However, this is a council policy document and is subject to the same public engagement arrangements as all other SPDs. It

		would not be appropriate to involve a specific person to a greater degree than others.
	Welcomes the city finally providing guidance to the owners of historic buildings but considers the draft document to be deficient in numerous ways – e.g. confusing and contradictory phraseology and content, misunderstanding of terms and phrases, absence of clarity (or misguidance) about materials and methods, omissions and the use or creation of misleading or false hierarchies.	Noted. Partial change. The final SPD is a slimmed-down policy document and has been subject to revision and rewording to ensure clarity and consistency.
	The guidance on conservation principles does little to address the important conservation principles that have been acknowledged for the past few decades and that English Heritage’s most recent guidance (in ‘Conservation Principles, Policies and Guidance’) seeks to highlight. For example there is no mention of English Heritage’s headline principles nor of the ‘value’ groupings they employ. Most significantly, there is no mention of the critical need to assess heritage significance before proceeding with works.	Noted. Partial change. It would not be appropriate to simply repeat the guidance from national or English Heritage documents and this point has been made by English Heritage itself. However, the wording of the SPD has been revised to ensure consistency with the English Heritage guidance and to make the need to assess heritage significance prior to works more explicit.
	Various, substantial and detailed comments on traditional materials and methods of repair etc.	These largely relate to matters of guidance on materials, repair and restoration and will be addressed in future separate documents where appropriate.

