

Appendix 2 – Summary of Comments and Officer Responses

Consultee	Summary of comments	Officer response
The Brighton Society	Informative, well-intentioned and consistently relevant to the conservation of the city’s townscape and heritage assets. Overall welcomed and supported.	Noted.
	Paragraph 2.1 - support the intention to deliver regeneration projects that respect the historic environment, but note that it has not been followed in practice e.g. City College, Circus Street, Anston House. Housing figures are so pressing to local authorities that other standards seem to be swept aside.	Noted. This is a matter of policy and development management.
	Paragraph 2.1 - hope that the strategy will not be hidden away, and that other sections of the planning authority will pay proper attention to the perspective and advice provided by this service.	Once the final Strategy is adopted it will be publicised both internally and externally and made available on the council’s website.
	Paragraph 2.2 – support the commitment to the conservation or enhancement of conservation areas and their settings, but consider this has not been followed in respect of the Circus Street, City College and Anston House briefs and decisions. Would add bullet points to state that “the art of leaving well designed buildings and street furniture alone is an undervalued art” and that “all of a piece’ streetscapes deserve great respect before new buildings are designed to be inserted into them.”	The proposed bullet points are considered to be too detailed for the overarching objective.
	Paragraph 3.2 - not all the owners of newly listed buildings have internet access so how will they receive this information?	All owners and occupiers of newly listed buildings will continue to be notified of the listing by letter as per current practice and would only be notified by e-mail in those cases where an e-mail contact is already known. It is not considered necessary for the Conservation Strategy to provide details of this process.
	Paragraph 3.4 - look forward to the proposed supplementary planning document on listed buildings, but worried that previous SPDs have been under-publicised, overlooked and under-enforced. Would like sellers and buyers of already listed	All SPDs are material considerations in the determination of planning applications. They are publicised when adopted and made available on the

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	<p>properties, along with associated advertisers and conveyancing professionals, to be more forcefully alerted to, or reminded of, the significance of listing in this city, and at least encouraged if not required to raise the profile of this responsibility.</p>	<p>council’s website. The fact of a building’s listing is disclosed when a land charges search is undertaken.</p>
	<p>Paragraph 4.14 - suggest that it would be far better to have a policy of implementing conservation area designation, if it was felt that a particular area was in urgent need of greater protection, and accept that a character statement would have to be prepared at a later date. This would not be an ideal solution, but at least the conservation area designation would immediately bring greater protection.</p>	<p>To designate a conservation area without producing a Character Statement and without, where necessary, putting in place an Article 4 Direction, would be likely to mean that the new conservation area would immediately be ‘at risk’.</p>
	<p>Parts 5 and 6 - in view of the increasing pressure for housing and other developments within the city, perhaps this topic could be related to paragraphs 9.8 / 9.9, as an acknowledgment of the value of various urban green spaces not designated in heritage terms and a cross reference of the legal and policy frameworks for their protection from any future development?</p>	<p>Historic open spaces may be locally designated as heritage assets in the new Local List, as set out in part 6. Open space that does not have heritage value is not a matter for the Conservation Strategy. Open Space policy is addressed in the existing Local Plan and the draft City Plan.</p>
	<p>Paragraphs 8.13 & 8.14 - share the desire to see improvements to the Valley Gardens conservation area but would like to see recognition of the particular sensitivity of each of the historic green spaces, instead of the dismissive reference to their utility in general as “poor quality public space and public realm”. The priority accorded Valley Gardens is very welcome, but extremely concerned that parts of the master plan for the area will diminish the character and condition of the historic architecture and the fundamentally green spaces.</p>	<p>The distinctiveness of each historic green space is set out in policy SA3 of the draft City Plan (part 1). Separate public consultation has been undertaken on the Valley Gardens masterplan and will be carried out on each phase of that plan.</p>
	<p>Part 9 - endorse the sentiments that new development should respect or enhance the character of settings and that new design should be of the highest quality; but these intentions are far more easily asserted than achieved, and are often claimed, with little substantiation, to be essential factors in planning briefs or major applications. In recent decades many of the prominent new</p>	<p>Noted but this is a matter of Development Management and cannot be addressed in the Conservation Strategy. However, the council will continue to encourage pre-application consultation with local communities</p>

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	developments have been thoroughly mediocre or disastrously misconceived. The city has a better and more popular record where local opinion was closely consulted or the designs involved rigorous attention to the historic setting.	and the Strategy has been amended to refer to this.
	Paragraph 9.4 – welcome this statement would question whether this policy is currently being implemented.	Noted.
	Paragraph 9.7 - There is not much information about the proposed design panel to be set up to advise the planning committee. While the council cannot afford fully to staff the CAG, why propose another group which would also have to be serviced?	Further details of the form, composition and set up of the suggested local Design Panel have not yet been agreed. But this would be an arms-length panel and it is expected that developers would pay for this service and that it would complement, not replicate, the advice provided by CAG.
	Paragraph 9.10 – question if the Urban Design Framework SPD would take precedence over the Tall Buildings policy or operate within it? If it is the latter, would it in fact have any real effect or would it just play an advisory role in determining any planning application?	The SPD would provide greater detail on the proposed tall buildings policy and areas, to support the primary policy in the draft City Plan (part 1). Once adopted the existing guidance would be superseded. All SPDs are material considerations in the determination of planning applications.
	Paragraph 10.2 - it is equally true that quite minor changes to the public realm can have a damaging impact on the environment. Too often the efforts of local householders are undermined by the maintenance of the public realm. The state of street lights, trees, signs, paving, communal bins and street furniture all make an important contribution to the environment and can either enhance it or detract from it. The only recognition of this is in paragraphs 12.8 and 12.9 about the streetscape and street lights.	The Strategy has been amended at Part 12 to stress the importance of the public realm to the character and appearance of conservation areas.
	Paragraph 10.3 – Article 4 Directions should be extended to many more conservation areas.	The Actions after paragraph 10.5 set out the priorities for future Article 4 Directions and it is considered that this

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		is already ambitious given the level of resources required.
	Paragraph 10.5 - none of the existing Article 4 Directions include controls over solar panels. Many buildings and in some cases whole streets in conservation areas have been severely affected by the unsuitable (and uncontrolled) installation of solar panels. This is a critical problem that should be given high priority. All existing Directions need to be urgently updated to include controls on solar panels.	There is no simple process available to 'update' an Article 4 Direction within the legislation. To modify an existing Direction the council would have to cancel the existing Direction and prepare a replacement, with full public consultation.
Brunswick & Adelaide Residents Group	Welcome the document and many of its proposals in particular the immediate setting up of an architects' panel, Urban Design Panel and an SPD.	Noted.
	The Departments with which Conservation co-operates and consults should include Highways, Lighting, Pavements, Tourism, City Parks and City Clean. Actions and inactions by these departments frequently work against the interests of Heritage, and impede the excellent work of the Conservation Team	This is not a matter for the Conservation Strategy.
	The Estate Agents' Association could be used to promote the importance of conservation policies and the obligations of landowners and tenants	Noted. This can be raised with the Association and the practicalities and resource implications for both sides need to be considered. The Strategy has been amended to cover this but in a more generalised way as other options may also need to be explored.
	Recommends an increase in resources for promotion of the different areas of special interest, e.g. Brunswick Town	The Strategy states that 10% of staff time will be spent on promotion work and it is not considered practical to increase that. We would increasingly wish to encourage local societies to promote their areas and would provide some support to them to do this.
	The use of the Residents' Associations appears to be increased which we welcome.	Noted.

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	The setting of the Brunswick Terraces is at risk because of lack of designation for the lawns and increasing commercial activities, proposals for cycling on the promenade and lack of maintenance of the seafront railings.	Noted. However, the Conservation Strategy is not a policy document and does not provide detailed proposals for specific areas.
	The need for an updated Character Statement is considered of higher importance than the three identified, and would request Brunswick Town be in the top three.	The Strategy sets out the priority criteria for future character statements, with highest priority given to those conservation areas at risk. Brunswick town is given the next highest priority.
	The side streets and Mews and the maintenance of the pavings and roadways are a matter of concern.	Noted. However, the Conservation Strategy does not provide detailed proposals for specific areas.
	Adelaide Crescent is outstanding in its pavements and street furniture. However, pavements in Brunswick including Lansdowne Place, Lansdowne Street and Western Road have deteriorated and are unsafe and unsightly.	Noted. However, the Conservation Strategy does not provide detailed proposals for specific areas.
	The gardens in the Squares have been suffering from neglect. To prevent all the gardens, including Norfolk Square from further deterioration, an increased budget is needed. These Squares/Gardens are essential to the setting of Brunswick Town.	The Conservation Strategy does not allocate funding.
	Recommend that all Squares be on the English Heritage Register.	That is a matter for English Heritage. The Strategy encourages local societies to make applications to English Heritage for new listing proposals and has been amended to make clear that this also applies to applications for parks and gardens.
	Recommend that St. Ann's Well Gardens should be listed as an historic park.	That is a matter for English Heritage. The Strategy encourages local amenity societies to make applications to English Heritage for new listing and designation proposals.
	The reference to the painting programme and the proposed Review is welcomed. However, more council sponsored guidance	Full guidance on the revised specification will be provided in time

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	on the nature and type of paint accompanied by a manufacturers' training programme for painters.	for the next repainting cycle. Discussions have already been held with the Friends of Brunswick Square & Terrace about a seminar or workshop event for contractors.
	Would welcome a more prescriptive role by the council on enforcement.	The council has a separate Planning Enforcement Policy.
Conservation Advisory Group	Greater priority should be given to the designation of new conservation areas, with voluntary involvement of amenity societies.	The Strategy sets out why priority is to be given to ensuring that all existing conservation areas are protected by having a character statement in place and, where necessary, an Article 4 Direction. This is to reduce the number of conservation areas 'at risk'. Diverting resources to designating new conservation areas would risk increasing rather than reducing the number of areas at risk. The offer of voluntary involvement of amenity societies is welcomed but designation would still require significant resources from the council.
	With regard to the criteria for designation, residents don't live in certain areas, therefore society interest must be considered carefully within these areas.	The Strategy states that a potential conservation area should have "local community commitment to its preservation". This does not only mean residents but could be a local business community or neighbourhood forum as well. But without any such commitment from those who live or work in an area conservation designation would not be sustainable.
	Concern that the Valley Gardens masterplan is very damaging to	This is not a matter for the

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	a very important space and query the involvement of the Heritage Team.	Conservation Strategy. There has been separate public involvement in the masterplan and further such involvement is planned for each phase of the scheme.
	Stanmer tends to fall through the crack as the planning authority is the National South Downs Park Authority. The Stanmer Preservation Society's museum is being evicted from its premises; and there is no protection for the Museum and Stanmer Church.	This council is not the local planning authority Stanmer, but the Strategy makes clear that the Heritage Team will work corporately with City Parks and Property and Design to help to conserve Stanmer Park and the council-owned buildings within it.
	Queried how the council's service level agreement on archaeology would be affected if ESCC reduce their archaeological service.	The council has considered running its own archaeological service but there is insufficient work to justify this. However, by combining with other local councils its is considered that there is enough work for ESCC to continue running a long term service.
	Pleased at the idea within the Strategy of setting up a 'Local Design Panel'.	Noted.
	A lot of work is done without Listed Building Consent and that there is potential for local consent orders in some conservation areas of Brighton & Hove, which would free up resources for the Heritage team for other work.	The setting up of local listing building consent orders would require significant initial resources and would also be likely to have greater implications for future enforcement work. At the current time we do not consider such orders would be worthwhile. But this can be reviewed in later years once there is evidence from elsewhere of how they are operating in practice. The Strategy has been amended to accommodate this.
	Notes with dismay the loss of front gardens in conservation areas	The Conservation Strategy already

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	and throughout the city and urges the council first to introduce regulations throughout the city to prevent further loss and second to introduce policies to encourage the restoration of front gardens which have already been converted to hard standings for vehicles and other uses.	prioritises reviewing Article 4 Directions with particular reference to controls over front boundary walls. Article 4 Directions outside of conservation areas are not within the remit of the Conservation Strategy. The Conservation Strategy is not a policy document.
Kemp Town Society	<p>The Conservation Strategy should include the following paragraphs:</p> <p>"Any planning permission for the development of the Brighton Marina should not have an impact on the Grade 1 Listed estate of the Kemp Town Conservation Area and the height restrictions of the Brighton Marina Act 1968 should be implemented whenever the City Council considers any planning application for the development of the Brighton Marina".</p> <p>"Any Planning application for the development of the Black Rock Site should recognise its proximity to the Grade 1 Listed Kemp Town conservation area and any planning permission for the development of the site should limit its impact on the Kemp Town Conservation Area and should not exceed the height of the Marine Parade"</p>	The Conservation Strategy is not a policy document. Policy matters will be addressed through the City Plan (parts 1 and 2) and Supplementary Planning Documents where appropriate.
Kingscliffe Society	Paragraph 2.2 - support this and all the following bullet pointed commitments. Would welcome an additional reference to the maintenance of listed structures that feature among the council's property. The seafront decorative ironwork is always of greatest concern, forming one of the principal iconic images of the city.	Noted. Such a reference would be unduly detailed for the overarching objective. This objective covers all heritage assets, irrespective of ownership or location.
	Paragraph 3.4 Actions - support this priority, and hope that the document will help address the problem of widespread ignorance of and indifference to the listed status of many buildings.	Noted.
	Paragraph 4.7 Actions - western end of East Cliff conservation	The East Cliff Study is considered to

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	area suffers from policies promoting St James’s Street as a place for alcohol, gambling and clubbing. This results in a persistent and chronic struggle to preserve the historic fabric of the street and the character of the quiet residential streets leading from it. The Study should seek more firmly to promote the historic as well as “exuberant” cultural heritage of this locality, and to seek to reverse the outwardly sad and lurid decline of its architecture.	remain generally up-to-date and relevant and is not a priority for review under the Strategy.
	Paragraph 8.12 – would welcome suggested Article 4 Direction for East Cliff conservation area.	Noted.
	Paragraphs 10.2 - 10.4 – look forward to the implementation of these proposals for Article 4 Directions.	Noted.
	Paragraph 10.9 - can confirm that the appearance and comfort of the East Cliff area have distinctly been enhanced by the Regulation 7 Direction on estate agents boards and its enforcement.	Noted.
	Paragraph 12.3 - would be delighted if Valley Gardens could receive a programme of genuinely conservation-led restoration that respects its historic architectural and topographical nature, not transformation into a traffic dominated, disfigured area of hard surfacing and inappropriate planting.	This is not a matter for the Conservation Strategy. There has been public involvement in the masterplan and further involvement is planned for each phase of it.
	Paragraph 12.7 - in terms of public art, a fresh start could be made by removal of the tawdry ‘I have great desire. My desire is great’ and its replacement with something more suited to the Madeira Terrace.	This is not a matter for the Conservation Strategy.
Montpelier & Clifton Hill Association	Paragraph 10.2 - wholly endorse this view. But quite minor changes to the public realm can have a damaging impact on the environment. For the most part in the Montpelier and Clifton Hill conservation area houses are maintained to a very high standard. But too often the efforts of local householders are undermined by the maintenance of the public realm. The state of street lights, street trees, street signs, paving, communal bins and street furniture all make an important contribution and can either enhance it or detract from it. The only real recognition of this is in	The Conservation Strategy has been amended to make greater reference to the important contribution that the public realm makes to the special interest of conservation areas. But the Strategy does not allocate maintenance funding; that is a separate matter for the appropriate council services. All relevant teams will

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	paragraphs 12.8 and 12.9 about the streetscape and street lights.	be made aware of this Strategy.
	There are a number of street lamps in the MCHA area of original 1930s design. If one becomes unsafe would wish it to be replaced with a replica. In conservation areas the council should replace unsafe heritage street lamps with replicas. Many streets in the area have lost their original street lamps. Ideally would like to see modern lamp standards replaced by replicas. In some cases an acceptable compromise could be to use modern columns painted black with a swan neck. In terms of priorities architectural set pieces such as Montpelier Crescent should be top of list, as should streets with large numbers of listed buildings.	Funding for street lighting is not within the remit of the Conservation Strategy but the council does not have sufficient resources to guarantee the retention of all historic lighting columns in the city. The Strategy does commit the Heritage team to working with the Street Lighting team to identify the priorities for future conservation, which may be particularly important streets or squares or rare column patterns.
	The Conservation Strategy should state that healthy trees should be preserved and that the council should voluntarily ask the Planning Committee to approve any works to its trees in the same way that private landowners have to.	This is not a matter for the Conservation Strategy.
	The M&CH conservation area has a small number of original street signs. If one has to be replaced it should be replaced with a replica. Would also like to see all plastic street signs replaced over time with signs fixed to walls as in the past and with 'heritage signs' where appropriate.	The Strategy has been amended to include support for the principle of reinstating traditional street signs where appropriate and where funding has been made available.
	Pavements in the conservation area should be surfaced with traditional paving slabs. Original features, such as the cast iron covers over coal holes, kerb stones and the stone setts lining the gullies, should also be protected. Bollards should be of a traditional design.	The Conservation Strategy has been amended to make greater reference to the important contribution that the public realm makes to the special architectural and historic interest of conservation areas. But the Strategy does not allocate maintenance funding; that is a separate matter for the appropriate council services. All relevant teams will, though, be made aware of the Strategy once adopted.
	The council should review the number and location of communal bins with a view to minimising the impact on the conservation	This is not a matter for the Conservation Strategy.

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	area. Some of the central conservation areas still have rubbish and recycling collections. Brunswick, for example, still has twice-weekly rubbish collections. The council should review its collection rounds with a view to reducing the proliferation of communal bins.	
	The council should review and remove unnecessary street clutter.	The Strategy has been amended to make greater reference to the important contribution the public realm makes to the special architectural and historic interest of conservation areas, including the importance of uncluttered historic spaces.
	Welcome the proposed Article 4 Direction in the Montpelier and Clifton Hill Area (para.10.5). In recent years there has been a particular threat to front boundary walls and consequently gardens from the creation of hard-standings and to facades from the use of plastic or otherwise inappropriate fenestration.	Noted.
	Would suggest that St Anne's Well Gardens should also have the status of a registered park and garden of special historic interest.	That is a matter for English Heritage. The Strategy encourages local amenity societies to make applications to English Heritage for new listing and designation proposals.
North Laine Community Association	Welcome and support the draft strategy.	Noted.
	Acknowledge that there are conservation areas at risk, particularly Valley Gardens, and that there is a need to work more closely with conservation area societies.	Noted.
	Paragraph 2.1 - support this intention, but we have concerns that it has not been followed in practice, e.g. City College.	Noted.
	Paragraph 2.2 - support this section, but have concerns about the Circus Street proposal and the affect on Valley Gardens.	Noted.
	Paragraph 3.2 - look forward to the proposed SPD on Listed Buildings and the assurance that the document's policies and	Noted. The council has a separate Planning Enforcement Policy.

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	proposals will be enforced.	
	Part 9 - support these comments apart from the word “enhance” as it can be misconstrued as “develop” to developers.	Enhance is an integral part of planning legislation and national policy on heritage matters and has an established meaning in planning law.
	Paragraph 9.7 - There is no information about how the proposed design panel would be set up and who would be on the panel. We feel CAG fills this need and a design panel is unnecessary as it would create more work for the already over-stretched conservation and planning officers.	Further details of the form, composition and set up of the suggested local Design Panel have not yet been agreed. But it is expected that this would be an arms length panel and that developers would pay for this service and that it would complement, not replicate, the advice provided by CAG.
	Paragraphs 10.3-10.5 - would like to see Article 4 Directions extended to cover all conservation area and to cover control of solar panels. Many conservation areas have already been blighted by solar panels. North Laine does not suffer (yet) because the majority of the houses face east/west.	The existing Article 4 Direction for North Laine is an area-wide one. The Conservation Strategy prioritises the review of Article 4 Directions to consider controls over solar panels where necessary.
The Regency Society	Welcome the decision to review the city’s conservation strategy and find much to support in the resulting draft.	Note.
	Support the view expressed in paragraph 1.3 that the task of conserving the city’s heritage assets should involve the public. But feel that this principle of public involvement is not reflected in the remainder of the document as fully as it might be.	The Strategy has further identified some areas of work where partnership working with local amenity societies would be helpful. Other opportunities are likely to arise as implementation of the Strategy proceeds.
	Have had problems establishing whether buildings are listed. The list on the English Heritage web site does not permit a search based on the area of Brighton & Hove City Council and the list published by the council itself is not complete. Paragraph 3.2 proposes that the Council continue to publish an abridged list.	The summary list on the council’s web site is complete. We do not currently have the list entries in electronic format in order to be able to publish them online and this is dependent

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	<p>Would suggest that the action proposed should be to seek to improve access to information on listed buildings by publishing a full list and/or by persuading English Heritage to improve the search functions on its web site.</p>	<p>upon English Heritage. The council has no control or influence over the English Heritage web site.</p>
	<p>On the proposed Heritage Partnership Agreement for the University of Sussex, the society is not opposed to the principle of such agreements but would like to see a commitment in the strategy to some form of consultation before such an agreement is finalised. This could be achieved by asking the Conservation Advisory Group to review and comment on the terms of the agreement.</p>	<p>The new Regulations on Heritage Partnership Agreements, which were published after the draft Conservation Strategy, set out the requirements for public consultation and these requirements will be followed by the council. The Strategy has been amended to refer to this.</p>
	<p>Paragraphs 4.8 and 4.9 identify the need for character statements to be prepared or reviewed for a number of conservation areas. The priorities outlined reflect the lack of resources to carry out this work. Reference could be made to further priorities which could perhaps be pursued with the help of volunteers from within the conservation community, as represented for example by the membership of the Conservation Advisory Group.</p>	<p>The expectation is already that local amenity groups would assist in the research for the proposed character statements. But there would still remain significant resource implications for the council and it is not considered that capacity exists to make commitments beyond those in the Strategy.</p>
	<p>Paragraph 4.11 says that new conservation areas will only be designated if the Council has resources available to produce character statements and enhancement plans. This policy could result in an area which was a suitable candidate for conservation area status being denied the additional protection that stems from designation until such time as resources became available. There is a risk that valuable heritage assets may be degraded or lost. This policy should be reconsidered to allow the possibility of designation even though resources may not exist to implement the authority's "consequential duties and responsibilities". This again is an area where voluntary help could perhaps be used.</p>	<p>The Strategy sets out those areas that warrant future consideration for the designation as a conservation area. However, the Strategy sets out why priority is to be given to ensuring that all existing conservation areas are protected by having a character statement in place and, where necessary, an Article 4 Direction. This is to reduce the number of conservation areas 'at risk'. If the council were to divert resources to designate new conservation areas</p>

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		without regard to future “consequential duties and responsibilities” it may result in simply creating new areas that are immediately themselves ‘at risk’. The offer of voluntary of involvement of amenity societies is welcomed but designation would still require significant council resources.
	Paragraph 4.13 suggests that an area would only be designated as a conservation area if there is local community commitment to its preservation. Areas of significant heritage value may be left at risk simply because there is no strong local community. We would suggest that the wording of this section be changed to reflect the fact that not all areas have such local communities and that community support from throughout the city, for example as expressed by city-wide societies such as our own, could be a basis for designation.	The phrase “local community commitment to its preservation” does not only mean residents but could be a local business community or local neighbourhood forum or other grouping. But without evidence of any such commitment from those who live or work in an area, conservation designation would not lead to the type of cooperation that is necessary for the long term conservation of the area.
	Paragraph 6.3 - would therefore like to see an explicit commitment in the Strategy document to ensuring that attention is drawn to buildings with locally listed status when planning decisions are being made.	Once the new Local List has been adopted it will form an up-to-date list of undesignated heritage assets and this will be a material consideration in the determination of planning applications.
	Paragraphs 8.1 & 8.6 refer to the council’s power to take action where a listed building is at risk. It would be useful to provide a little more detail as to what such action might be and whether the cost of it would fall on council tax payers or be recovered from the property owner.	The Conservation Strategy has been amended to refer to the relevant legislation.
	Believe that the strategy on enforcement should go further and say that, in extreme cases, and only as a last resort, the council will use its powers of compulsory purchase.	This is already the council’s position on its compulsory purchase powers. The Strategy has been amended to refer to this.
	Section 9 refers to the need for good design for modern buildings	The Strategy has been amended to

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	in conservation areas. One of the factors that influence the quality of new buildings is the quality of the materials used, both in terms of appearance and in relation to how they are likely to weather. It would be useful if some specific reference could be made to this.	refer to materials.
	Welcome the possibility of establishing a design panel. It could advise the Planning Committee not only on conservation matters but also on developments not affecting heritage assets.	It is expected that the Design Panel would advise the Planning Committee on major applications throughout the city.
	Hope that the establishment of such a panel would not reduce further the already limited input of professional advice available to the Conservation Advisory Group (CAG). Would like to see some recognition of this in the Strategy, together with an assurance that the need to service the new design panel will not result in any further reduction in support for the work of CAG.	The Strategy already includes a commitment to continued support of CAG. It is expected that developers would pay for the Design Panel service and that it would complement, not replicate, the advice provided by CAG.
	Have some concerns about the commitment in paragraphs 9.9 and 9.10 to publish an Urban Design Framework. Could more information be provided about what form it will take and how it could be applied? Assume that such a document would be subject to wide consultation and suggest that a statement to that effect should be added here.	City Plan (part 1) policy CP12 provides the broad scope of the proposed document and the Conservation Strategy has been amended to reflect that wording. All SPDs are required to be subject to public consultation and the first, informal stage of consultation will invite comments on the format and content of the document.
Regency Square Area Society	Welcomes the Draft Conservation Strategy and would like to register eagerness to work with the council in order to achieve an overall commitment to the objectives under paragraph 2.2.	Noted
	Paragraph 2.2 – suggest that this objective cannot be achieved unless conservation policies are looked at in the context of how buildings are used. To make the sea front area as attractive as possible for visitors (thus maximising its economic value to the city economy) it is surely reasonable to discourage the use of buildings for hostels and low quality HMO housing, for example.	The Conservation Strategy is not a planning policy document.

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	<p>It is to be noted that large numbers of shops in the RSAS area are either empty or used for low quality temporary purposes. A strategy to find alternative uses for such buildings would have a positive economic impact upon the area. Urge the Heritage team to set up structures that integrate such linked issues.</p>	<p>The council already has an internal officer working group concerned with bringing back empty properties into residential use. The Heritage team is represented on that group but it would not be appropriate for the Heritage team to lead on this issue.</p>
	<p>Paragraph 13.3 – this offers a great opportunity for local groups to collaborate at a strategic level in policy and operations with regards to developments that impact on the area. But do not understand how the CAG would have a role in identifying joint initiatives. This type of proactive policy making has not in recent years been the primary role of CAG and cannot see why the opportunities for joint initiatives could not come directly from area societies. In addition there may be a role for organisations such as the Brighton & Hove Heritage Commission to identify strategic roles for area societies. Look forward to receiving details as to how this would be implemented.</p>	<p>CAG has itself expressed an interest in working with the council on joint initiatives and this paragraph reflects that. But it is agreed that opportunities for joint initiatives may be put forward directly by local amenity societies or other forums. The wording of the paragraph does not state that such initiatives may only come from CAG but it has nevertheless been amended to provide greater clarity.</p>
	<p>Paragraph 3.4 - support this but would urge the council to discourage the use of listed buildings for HMOs. It is widely recognised that HMO use can put unacceptable strain on old structures and all the council has to do is to make this widely recognised principle into a specific policy.</p>	<p>The Conservation Strategy is not a planning policy document.</p>
	<p>Part 4 - disappointed at the somewhat unambitious nature of current and future conservation area policies. Eleven Character Statements written by the council over the past ten years is not a high number. The aim to complete the list of character statements within ten years seems equally unambitious.</p>	<p>It is important to put this work into the context of all the areas of work that have been completed during the last ten years and all those that are prioritised for the next ten years. It is important that the aims and aspirations of the Strategy are realistic and deliverable.</p>
	<p>Part 4 - There is an impression that the growing development pressure on conservation areas near the city centre at least</p>	<p>All of the more recent character statements have been produced with</p>

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	<p>makes much more finely detailed Character Statements a matter of priority. Suggest that a new approach to Character Statement writing be adopted that encourages more fine detail so that the document could be useable as part of a planning process. It might be advantageous for the boundaries of the Regency Square Conservation Area to be reviewed. The RSAS is happy to produce a revised Character Statement for the area, in collaboration with the Heritage team and other amenity societies if by doing so we could expedite the needed revisions.</p>	<p>reference to the detailed guidance on this subject produced by English Heritage. The older character statements pre-date that guidance and vary in format and detail. However, they mostly remain very useful documents for planning purposes. The one for the Regency Square conservation area was adopted in October 2005 and is more up-to-date than many of the statements. It is therefore not a priority for review.</p>
	<p>Part 8 - support the proposed policies regarding listed buildings at risk.</p>	<p>Noted.</p>
	<p>Part 8 - considering the dereliction in the West Pier area, and the on-going lack of viable plan for the future of the West Pier site, it is not recognised that certain aspects of Regency Square Conservation area can be considered to be at risk. Can this issue be included in the Conservation strategy?</p>	<p>The conservation areas at risk are determined on the basis of the annual English Heritage survey data. Regency Square conservation area is not deemed to be at risk.</p>
	<p>Part 9 - note that this refers to five separate document types that may impact upon issues relating to new developments in conservation areas. It is not clear which significance can be attributed to each document. Suggest that policy relating to new development in conservation areas be simplified and clarified. Note that a more comprehensive Character Statement would serve to identify such sites and properties.</p>	<p>There are in fact four document types mentioned and all have a role to play in the heritage planning system. The weight to be attached to them in each case will vary and the Conservation Strategy is not an appropriate document to provide a detailed explanation of the planning policy framework.</p>
	<p>Paragraph 9.4 - agree with the general tenor of this statement but believe that this distinction has not been actually taken onto account by the planning process up to now. Surely more specific Character Statements would be necessary to put this concept into operation?</p>	<p>Character statements and management plans are indeed very important in this and that is why the Conservation Strategy has prioritised the production of character statements for those conservation areas that</p>

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		currently lack one at all.
	Paragraph 9.3 - fully support this but it is not clear if the Heritage planners consider this to be a policy currently in operation or one to be aspired to. The Regency Square Conservation Area has not benefitted by a high level of new architecture in recent years' developments, and the RSAS would strongly support a move to ensure that any new structures in conservation areas are of a very high standard indeed.	The Conservation Strategy intends to cover the next ten years.
	Part 9 Actions - This is a highly ambitious statement and requires much clarification. What is a "visually sensitive development site"? Surely any site in a conservation area could be considered visually sensitive? If that is the case will all development in conservation areas be put out to competitive tender? The reference to "local representation" is an interesting one and implies that groups such as the RSAS will be allowed to participate in these early stages of the planning process. This is an important point that requires clarification.	In the majority of cases sites within conservation areas will be visually sensitive but the scale of development will also be an important factor. The council has no control over the selection of architects on privately owned sites and can only encourage competitive selection, as the wording states. This is likely to apply to major schemes. There have already been a number of major developments where local societies and residents groups have been consulted at the pre-application stage. The wording of this Action has been slightly amended to clarify these points.
	The RSAS supports the concept of a local Design Panel rather than a Kent based one but we would suggest that a majority of members should not be architects or planners, although advice from professionals would be welcome.	The form and composition of the Design Panel have not yet been determined but it is intended to be a professional arms length panel for whose advice developers would pay. It would complement the advice provided by CAG.
	We urge the council to include all structures in conservation areas in their search for design quality. This can include car parks, signage, street lighting, fencing and warning signs.	All relevant council services will be made aware of the Conservation Strategy once it has been adopted.

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	Part 10 - support the proposal to update External Paint and Colours guidance, and would be happy to work with the council on a review of Article 4 Directions for the Regency Square Area.	Noted.
	Paragraph 10.11 - suggest that Russell Square in which there are significant numbers of Grade 2 listed buildings should be brought into the controlled area for estate agents boards.	The council proposed that the whole of the Regency Square conservation area should be included within the Regulation 7 area but this was not supported by the Inspector following the public hearing.
	Paragraph 12.7 - the A259 Seafront includes part of the Regency Square Conservation Area and we support plans for improvements.	Noted.
	Paragraph 12.8 - many areas within the RSCA, as in other conservation areas, have badly neglected streetscapes. Preston Street urgently needs upgrading, as do other parts of the street scene. Preston Street should become a shared space.	The priority areas for public realm improvements are set out in the City Plan (part 1).
Round Hill Society	Would like to emphasise three areas in need of greater priority which could be lost if the generality paid to them in the document is not accompanied by specific commitments relevant to our neighbourhood.	The Conservation Strategy is not a planning policy document.
	<p>1. Open spaces - recommendations</p> <p>(a) the value & functions of the open spaces need far greater emphasis within the next revision of Round Hill's conservation area character statement.(b) redress past omissions of site-specific open space assessment in relation to planning proposals which affect the green hillside spaces & boundaries. (c) tree applications need to be assessed with care when the proposals relate to boundary features of the conservation area with important screening functions.(d) biodiversity is always going to count more than accessibility in valuing open spaces on steeply sloping hillside. But the Biodiversity Checklists, which developers have to submit as part of planning applications, remain</p>	Proposed open space policy is set out in the City Plan (part 1).

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	<p>nonsensical if the same developers are permitted to strip greenfield sites to bare earth (with or without permissions to fell trees) prior to their applications for new-build. (e) The function of open space assessment (e.g. screening, visual amenity, psychological health, feeling of well-being) goes beyond the ecologist's remit of flora & fauna. In relation to several conservation areas, especially Round Hill, where open spaces are all private and inaccessible, a “citywide” open space study which pools together all the accessible public parks and recreation grounds, does not address a conservation area strategy at all and gives little regard to open-space needs on a “neighbourhood” level.</p>	
<p>190</p>	<p>2. Street furniture - recommendations</p> <p>(a) welcome liaison between the heritage team and lighting department, but mechanisms are needed to ensure that sub-contractors do not replace lamp posts of historic value under the pretext of following a general instruction which bears no reference to any conservation area strategy. Section 10.5 of the draft strategy considers the extension of Article 4 Directions to cover controls over front boundary walls and solar panels. Suggest that the retention of historic street furniture should also be written into the council’s policy guidance.</p> <p>(b) The minimisation of clutter (e.g. unnecessary & ugly signage) also needs to be covered by formal policies, even if their implementation may sometimes depend on voluntary agreements. Round Hill has a lot of short term residents. Several streets therefore suffer from estate agents’ boards. It would benefit Round Hill if (as in central areas of the city) there were agreement not to use boards, but this intention also needs the support of a robust policy.</p>	<p>(a) The Conservation Strategy notes that the council does not have sufficient resources to guarantee the retention of all historic lighting columns in the city. The Heritage team will therefore work with the Street Lighting team to identify the priorities for future conservation, which may for example be particularly important streets or squares or rare column patterns.</p> <p>(b) The council has adopted policy on advertisement signage in historic areas. The existing Regulation 7 Direction on the control of estate agent boards was confirmed after a public hearing. The Inspector required a reduction in the area covered by the controls. Therefore it is unlikely that further controls would be supported.</p>

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	<p>(c) Council departments need to be guided by policies relating to street clutter, especially in conservation areas. The signage for Round Hill’s CPZ is noisier and more cluttered than in other LA areas where residents’ parking has been introduced. A review of signage is needed with the character & appearance of Round Hill as one of the main guiding principles.</p> <p>(d) It should be part of a conservation strategy to increase public appreciation of heritage assets. Would like to see a section in the strategy on cost effective ways of capitalising on the current appeal of conservation areas. Understand the limits on resources but some public seating, sited in locations where it would not invite nuisance, could prove cost effective. It would increase the amenity value & public appreciation of Round Hill’s distinct architectural beauty & uniformity and capitalise on long-views.</p>	<p>(c) This is a detailed highways issue and not a matter for the Conservation Strategy.</p> <p>(d) Part 13 of the Strategy covers the promotion of heritage. The City Plan (part 1) has a policy on Public Streets and Spaces and public seating falls under that policy. The Conservation Strategy does not allocate council funding for specific public realm works.</p>
	<p>3. Minor updating of Conservation Area Character Statements</p> <p>Noted (in section 4.7) that budgetary considerations limit the priority which can be given to reviewing existing conservation area character statements. The council is to be commended for these. However, it devalues a good statement when small details (e.g. how many pubs there are in the area), which may not directly relate to conservation issues, go unamended as time moves on. With good liaison between the council and local residents’ associations, it should not be too demanding on resources to keep this kind of information up to date.</p>	<p>Minor changes in an area over time, such as the change of use of some buildings, are to be expected and do not generally affect the relevance of the character statement as a material consideration in the determination of planning applications. Character Statements will only be brought forward for review where they are substantially out of date.</p>
<p>Roger Amarena</p>	<p>The Strategy should include provision for the encouragement of owners, particularly of HMOs, to reinstate front garden areas dustbin housing areas have been created and are now redundant. Now that City Clean has a different system of rubbish pick-up there is no need for such areas. Gardens could be reinstated which would certainly enhance the appearance of our streets and also would improve conservation areas.</p>	<p>The Conservation Strategy is not a policy document. Consideration can be given to this issue in the drafting of the City Plan (part 2).</p>

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	<p>The draft strategy also mentions about the need to complete Character Area Statements first before designating new conservation areas. Suggest adding to this clause "the ability to add a conservation area in an emergency to protect a building under threat or a group of buildings in danger".</p>	<p>The aim of the Conservation Strategy is to ensure the council has a planned, pro-active approach to the city's heritage rather than a reactive one. Conservation areas should only be designated where an area as a whole has a special interest that warrants preservation and enhancement. Potential areas for consideration are suggested in the Strategy. They should not be designated simply to protect a particular building that may be under threat. It is unlikely that the appearance and character of a whole area of the city would be under immediate or urgent threat.</p>
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