

# Initial Consultation Statement

Historic Environment  
Supplementary Planning Document

December 2020



# Contents

1 Introduction .....	1
2. Who was consulted? .....	1
3. How were they contacted? .....	1
Appendix 1 – Initial Consultation Responses.....	3

# 1 Introduction

The Historic Environment Supplementary Planning Document (SPD) will provide further guidance on the implementation of planning policy including practical planning guidance for developers and homeowners who are either planning new development or making changes, alterations or repairs to an existing property. It will also cover topics not included in previous guidance, such as energy efficiency and adapting to climate change.

This Consultation Statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the Draft SPD being held between 7<sup>th</sup> December 2020 and 1<sup>st</sup> February 2021. The statement outlines the initial consultation that has been undertaken to inform the preparation of the SPD. An initial consultation was held between 27<sup>th</sup> September and 25<sup>th</sup> October 2019.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement<sup>1</sup>.

## 2. Who was consulted?

The following organisations and groups were consulted as part of the initial consultation:

- Suffolk County Council Archaeology Service
- Historic England
- National Trust
- Suffolk Preservation Society
- Town and Parish Councils
- Civic societies
- Elected members
- Members of the public

## 3. How were they contacted?

The consultation was advertised on the Council's website, as well as on social media. A questionnaire, providing some background to the consultation and asking a series of

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<sup>1</sup> How to get Involved in Local Planning – Statement of Community Involvement (September 2014)

questions, was published on the Council's website. Elected members, town and parish councils and other organisations listed above were notified directly by email.

The consultation asked the following questions:

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?
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?
3. Should it provide links to other organisations' websites to obtain further information?
4. Should the SPD include historical contextual information or should this be left out?
5. Do you find the use of illustrations helpful in understanding planning and the historic environment?
6. Which of the below sections would most benefit from illustrations?
7. Please let us know if you have any other comments

The consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/consult.ti/historicenvironmentspd2019/consultationHome>

Hard copies of the consultation materials could be sent to consultees and members of the public upon request.

In total 17 individuals and organisations responded to the consultation. Between them they made 97 comments. The responses are summarised in the pages below, along with a description of how the comments have been addressed. The full responses can be viewed online at:

[Responses to the Consultation - Historic Environment Supplementary Planning Document - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

## Appendix 1 – Initial Consultation

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

### 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?

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	Robust enforcement policy is needed. There also needs to be greater focus on the balance between economic and environmental considerations.	The SPD refers to instances where enforcement action may be taken. The draft SPD contains guidance about sustainable energy and construction.
Bawdsey Parish Council (Andrew Rouse)	Energy efficiency should be included under both making changes and the repairs and maintenance sections.	The guidance contained in the chapter about sustainable energy and construction would apply when making changes and in maintenance, and has been put to the front of the document to provide emphasis.
Beccles Society (Paul Fletcher)	The document should include chapters about demolition and new build in conservation areas.	The draft SPD contains guidance about both construction and demolition in conservation areas.
Easton Neighbourhood Plan (Sue Piggott)	Policy should prevent the installation of inappropriate lighting within conservation areas.	The draft SPD provides guidance on the appropriate installation of lighting within conservation areas.
Jill Temperton	There should be a full survey of non-designated heritage assets and this should be considered when deciding planning applications. This survey should include town and parish councils.	The SPD contains guidance that will help to protect and enhance non-designated heritage assets as part of the planning application process, and this references that Non Designated Heritage Assets could be identified through the consideration of a

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
		planning application. It also sets out the criteria for identifying non-designated heritage assets.
Leave The Layers Alone (Peter Minta)	The SPD should contain a list of areas of national and local historic importance.	This SPD explains the status and purpose of the various designated heritage assets, such as Listed Building and Conservation Areas, and non-designated heritage assets. It would not be feasible to list all of the assets themselves in the SPD.
Little Bealings Parish Council (Carol Ramsden)	There should be a policy regarding redundant buildings in the countryside and a new policy that relates to the conversion of a group of buildings.	Suffolk Coastal Local Plan policy SCLP5.5 (Conversions of Buildings in the Countryside for Housing) and Waveney Local Plan policy WLP8.11 (Conversion of Rural Buildings to Residential Use) both contain policies about the conversion of redundant buildings. The draft SPD contains guidance to support the implementation of these policies.
Melton Parish Council (William Grosvenor)	Contents list is fine.	Support noted.
National Trust (Tessa Lambert)	This SPD should contain guidance about hard landscaping, such as paths and driveways. It should also contain guidance about permeable surfaces.	This SPD contains a chapter about the setting of historic buildings, which includes paths and driveways. Reference is also made to permeable surfaces in light of seeking to reduce run-off.
Paul Clarke	More existing Suffolk Coastal Guidance needs to be retained. There should also be guidance about the following topics: Setting Non-registered gardens Disabled access Redundancy and new uses Use of contemporary design in heritage assets.	These topics are covered in the draft SPD. The SPD retains existing guidance where it is still relevant and consistent with Local Plan policies.

Respondent	Comment	Council Response
Southwold Town Council (Jessica Jeans)	Yes	Comment noted.
Suffolk Preservation Society (Bethany Philbedge)	<p>This SPD should provide comprehensive guidance about the historic environment. This should include a definition of the historic environment in the introduction to include the following:</p> <ul style="list-style-type: none"> <li>• Designated Heritage Assets</li> <li>• Non-designated heritage assets</li> </ul> <p>Guidance should include:</p> <ul style="list-style-type: none"> <li>• Development within the setting of a listed building</li> <li>• Purpose of conservation area designation and the impact of development upon a conservation area</li> <li>• Requirement for the design and location of highway works, public realm signage, street lighting and the historic environment.</li> </ul>	<p>The draft SPD provides comprehensive guidance about the historic environment and includes information and guidance for both designated heritage assets and non-designated heritage assets.</p> <p>Guidance includes information about the impact of development on the setting of a heritage asset, whether listed or not, the purpose of conservation area designation and the impact of development upon a conservation area.</p> <p>Guidance on lighting is included in the Draft SPD, however highways works themselves and associated lighting and signage are beyond the scope of the SPD.</p>
Theatres Trust (Tom Clarke)	The document should make clear that it only provides general guidance. It should make clear that for specific types of buildings the owner should contact the relevant specialist organisation, such as the	The section on 'purpose' clarifies that the guidance is general. The SPD provides links to information from other organisations where appropriate.

Respondent	Comment	Council Response
	Theatres Trust, or consultants with relevant experience.	
Westover Landscape Ltd (Anne Westover)	This SPD should include reference to historic landscape elements, which contribute to the historic environment.	The SPD focuses on providing guidance to support the implementation of the Local Plan policies. The draft SPD explains that landscapes make up part of the historic environment. This SPD includes a chapter about the setting of historic buildings. This discusses how surrounding features contribute to the setting of a historic building. The chapter about parks and gardens and accompanying appendix describes parks and gardens within the district as well as common features of parks and gardens, and provides guidance for them. The section on Conversion of Historic Buildings in the Countryside for Residential Use also provides guidance on considering the building's contribution to the landscape.
Wickham Market Parish Council (Joanne Peters)	This SPD should include guidance about heritage assets that are neither Listed or identified as non-designated heritage assets but which still contribute to conservation areas.	The draft SPD includes reference to buildings that make a positive contribution to a Conservation Area. The guidance provided in relation to Conservation Areas would apply throughout Conservation Areas.

## 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?

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	The SPD should include guidance about repairs and alterations. There should also be clarity about minor versus major alterations.	The draft SPD contains guidance about repairs and alterations. It also contains guidance about the types of alterations that may have a significant impact upon a heritage asset.
Bawdsey Parish Council (Andrew Rouse)	This SPD should focus on what types of changes and repairs are acceptable in planning terms.	The draft SPD provides guidance about what changes and repairs are acceptable in planning terms.
Beccles Society (Paul Fletcher)	The SPD should make clear what is required for applications in conservation areas. It should also explain why certain fixtures, such as disabled access, energy saving or rainwater collecting devices, are not acceptable on aesthetic grounds.	The draft SPD contains guidance about energy efficiency and sustainability measures, and ways in which these can be addressed without harming the historic environment. Guidance on disabled access has been included in relation to the guidance on shop fronts.
Easton Neighbourhood Plan (Sue Piggott)	This document should contain planning policy not guidance, which is easily ignored.	This SPD will provide practical guidance to help in the implementation of Local Plan policies, which seek to protect and enhance the historic environment. The SPD itself cannot set policy, however once adopted it will be a material consideration in decision making.
Jill Temperton	This SPD should focus on practical guidance.	The SPD provides guidance on repairs and includes links to websites with further information.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Leave The Layers Alone (Peter Minta)	This SPD should focus on whether development is necessary on historic sites, including those that are not nationally or locally listed.	The SPD does not consider the principle of development – policies on this are established in the Local Plans – however it provides guidance on what may or may not be acceptable in terms of impacts on the historic environment.
Melton Parish Council (William Grosvenor)	This SPD should highlight the development constraints in conservation areas. It should also contain information about buildings at risk.	The draft SPD contains a chapter about development in conservation areas. Information about buildings at risk is available on the Council's website, however the SPD is a planning document and focuses on guidance related to development or works to assets that may need consent.
National Trust (Tessa Lambert)	This SPD should explain what planning policy requires, particularly for extensions, conversions of redundant buildings and new shopfronts and signage.	This SPD contains chapters about extensions, conversions of redundant buildings and shopfront design, which explain what is required by relevant planning policies.
Paul Clarke	This SPD could include two sections, one about what is policy compliant and another with practical guidance.	This SPD explains what types of changes and repairs are policy compliant as well as guidance about how they can be undertaken. Links are included in the SPD to other sources of information including on practical guidance.
Southwold Town Council (Jessica Jeans)	This SPD should also include practical guidance about repairs and alterations.	This SPD also includes guidance about how repairs and alterations can be undertaken, as well as links to websites with further information.
Suffolk Preservation Society (Bethany Philbedge)	This SPD should encourage development to secure the best outcomes for the historic environment, and not just what is acceptable. This should also include	This SPD provides guidance which will encourage the most appropriate outcomes for the historic environment, however the best way of doing this is likely to vary from case to case. The SPD includes

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
	practical information on changes to the historic environment.	examples through the use of photographs and illustrations.
Theatres Trust (Tom Clarke)	This SPD should point users to more specialist advice where that is needed. Focus on policy and decisions could make the document too prescriptive.	The draft SPD includes links to specialist websites where appropriate. Guidance is provided but it does not seek to prescribe what is acceptable in each instance.
Westover Landscape Ltd (Anne Westover)	This SPD needs to explain how to protect landscape features and trees.	The draft SPD includes a chapter about historic parks and gardens, which seeks to protect trees, hedgerows and other landscape features.
Wickham Market Parish Council (Joanne Peters)	This SPD should include practical guidance.	The draft SPD includes a links to other sources of information including practical guidance.

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

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	This SPD should include links to the websites of specialist organisations, such as the Suffolk Preservation Society.	This SPD includes links to specialist organisations' websites where appropriate.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Bawdsey Parish Council (Andrew Rouse)	Practical guidance is best accessed via third party websites or the Building Control portal.	This SPD includes links to sources of practical guidance where appropriate.
Beccles Society (Paul Fletcher)	Links to the websites of other organisations are useful but it must be made clear that they are for information only. There should be emphasis on cooperation and consultation.	This SPD includes links to other organisations' websites where appropriate. These are provided for information as it is not for the Council to endorse content of other websites.
Easton Neighbourhood Plan (Sue Piggott)	Providing links will further understanding of policy and aid officers in reaching decisions.	This SPD includes links to other organisations' websites where appropriate.
Jill Temperton	Links would be useful.	This SPD includes links to other organisations' websites where appropriate.
Leave The Layers Alone (Peter Minta)	Yes	This SPD includes links to other organisations' websites where appropriate.
Melton Parish Council (William Grosvenor)	Links to websites providing advice and guidance would be useful.	The draft SPD includes links to other organisations' websites where appropriate.
National Trust (Tessa Lambert)	Yes, a link to specialist organisations' websites would be helpful.	The draft SPD includes links to other organisations' websites where appropriate.
Paul Clarke	Yes.	The draft SPD includes links to other organisations' websites where appropriate.
Southwold Town Council (Jessica Jeans)	<p>The advice published by the Georgian Group, Victorian Society and the Twentieth Century Society should be incorporated into the design policy as a material consideration. Planning applications consistently fail to adhere to the requirements of Local Plan policies.</p> <p>The SPD should:</p>	The draft SPD provides a chapter about information requirements for planning applications. It also provides links to further guidance on the Historic England website where appropriate. The purpose of the SPD is to provide clear guidance on the interpretation of planning policies, for example through reference to good examples.

Respondent	Comment	Council Response
	<ol style="list-style-type: none"> <li>1. Provide clear guidance about information requirements to applicants.</li> <li>2. Incorporate Historic England and civic society best practice to improve the quality of applications.</li> <li>3. The incorporation of best practice should reduce demands on planning officers.</li> </ol>	
Suffolk Preservation Society (Bethany Philbedge)	The SPD should include links to the East Suffolk Design and Conservation team pages, as well as Historic England (including notes on the setting and significance of heritage assets), Society for the Protection of Ancient Buildings, the Victorian Society, Georgian Society, Twentieth Century Society and the Ancient Monuments Society.	This SPD includes links to other organisations' websites where appropriate, as well as links to the Design and Conservation Team's webpages.
Theatres Trust (Tom Clarke)	It would be beneficial for theatre owners to engage with the Theatres Trust.	This SPD includes links to specialist organisation websites where necessary.
Westover Landscape Ltd (Anne Westover)	This would seem to be appropriate	The draft SPD includes links to other organisations' websites where appropriate.
Wickham Market Parish Council (Joanne Peters)	As this will be an online document links to other organisations are in order.	The draft SPD includes links to other organisations' websites where appropriate.

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

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	This SPD should include historical context, preferably in the same document. It is vital that historical information is captured, retained and made available.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Bawdsey Parish Council (Andrew Rouse)	Historical information is only necessary to contextualise local planning requirements. Links should be provided to third party websites.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided. Links will be provided to other organisations' websites where appropriate.
Beccles Society (Paul Fletcher)	It will be helpful to illustrate the reasoning behind policies and make the document more user friendly.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Easton Neighbourhood Plan (Sue Piggott)	It should definitely include historical contextual information.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Jill Temperton	It should be included.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Leave The Layers Alone (Peter Minta)	Historical contextual information must be included when considering any sites	The draft SPD includes a section on submitting a planning application which sets out the information to be included.
Melton Parish Council (William Grosvenor)	Historical context would be useful to inform how buildings have developed and add interest.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
National Trust (Tessa Lambert)	Historical context helps to explain how a policy has been developed. Removal of contextual material may reduce the value of the document.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Paul Clarke	This is potentially a very large topic and it is hard to know what to include. Reference to published sources is favoured.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided. Reference to information available from other organisations is also included.
Southwold Town Council (Jessica Jeans)	Historical context should be included, together with reference to conservation and neighbourhood plan character area appraisals. The latter should be referenced even if the neighbourhood plan has not yet been adopted.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided. There are a number of Neighbourhood Plans under preparation and it isn't appropriate for the SPD to reference specific appraisals, however the SPD does refer to Neighbourhood Plans containing policies on the historic environment and the guidance in the SPD may support the implementation of these. However the Neighbourhood Plan itself is the most appropriate place to take forward any character area appraisals produced for the local area through locally relevant policies.
Suffolk Preservation Society (Bethany Philbedge)	Historic information should be handled on a case by case basis using conservation area appraisals and heritage assessments.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Westover Landscape Ltd (Anne Westover)	This would seem to be appropriate.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided.
Wickham Market Parish Council (Joanne Peters)	Historical contextual information should be set out in a separate document.	The draft SPD includes historical contextual information where this is relevant to the guidance being provided. Some information that is presently contained in the

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
		Supplementary Planning Guidance documents will not be included but may be published separately (for example the descriptions of the historic parks and gardens).

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

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	Supports the use of photographs.	This SPD uses photographs (and illustrations) to help explain guidance and policy requirements.
Bawdsey Parish Council (Andrew Rouse)	Diagrams and illustrations can help to explain structural detailing and spatial configurations.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Beccles Society (Paul Fletcher)	Illustrations can help to explain technical details and make the document more interesting to read. The Beccles Society can let you have access to a number of photos and sketches.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs. The offer of photos and sketches is appreciated.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Easton Neighbourhood Plan (Sue Piggott)	Illustrations always help in understanding planning and the historic environment	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Jill Temperton	Yes.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Leave The Layers Alone (Peter Minta)	Yes. Photographic evidence should also be included.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Melton Parish Council (William Grosvenor)	Yes	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
National Trust (Tessa Lambert)	Yes, the illustrations, particularly in SPG13, are extremely helpful.	This SPD uses photographs and illustrations to help explain guidance and policy requirements. This includes some original illustrations from SPG13.
Paul Clarke	Yes, they can help to clarify a point which might take a lot of text to explain.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Southwold Town Council (Jessica Jeans)	The use of illustrations is extremely useful and the text should make clear that these are part of the guidance. Illustrations should be used to show best practice, as well as what should be avoided.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs. Care should be taken when using photographs of specific properties and it is not appropriate to highlight identifiable bad examples in this way.
Suffolk Preservation Society (Bethany Philbedge)	Yes – incorporating examples of good and poor practice.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs. Care should be taken when using photographs of specific properties and it is not appropriate to highlight identifiable bad examples in this way.
Theatres Trust (Tom Clarke)	Illustrations can help to explain and describe positive improvements.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Westover Landscape Ltd (Anne Westover)	Yes certainly, sketches, details, photographs are all useful including those that illustrate landscape elements.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating the guidance, however much more use has been made of photographs.
Wickham Market Parish Council (Joanne Peters)	Yes.	Some illustrations have been retained in the SPD from previous Supplementary Planning Guidance where they are considered valuable in illustrating

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
		the guidance, however much more use has been made of photographs.

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

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	The sections about repairs and alterations will need illustrations, as well the other sections previously covered by SPG13 and SPG14. SPG19 should also be supported by illustrations.	This SPD uses new photos as well as illustrations taken from previous guidance, which have been updated. It should be noted that there is no SPG19.
Bawdsey Parish Council (Andrew Rouse)	You decide. Probably your old SPG13 (circa 1997) could do with sprucing up.	This SPD uses new photos as well as illustrations taken from previous guidance, which have been updated. This SPD will replace SPG13 and makes use of photographs which were not included in SPG13.
Beccles Society (Paul Fletcher)	The 2 sections on buildings and the section on conservation areas.	Guidance about alterations and repairs to buildings and is accompanied by illustrations. The chapter about conservation areas is illustrated through the use of photos.
Easton Neighbourhood Plan (Sue Piggott)	All the sections would benefit from illustrations	Comment noted.

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Jill Temperton	Buildings - Making changes & Repairs and maintenance	Guidance about alterations and repairs to buildings is accompanied by illustrations where appropriate.
Leave The Layers Alone (Peter Minta)	Non designated heritage assets	The guidance on Non-Designated Heritage Assets does not lend itself to the use of illustrations as there are numerous Non-Designated Heritage Assets, of many different types including buildings and structures. However some of the illustrations provided may be relevant to Non Designated Heritage Assets.
Melton Parish Council (William Grosvenor)	All	Comment noted.
National Trust (Tessa Lambert)	The following sections require illustrations. Alterations and extensions Windows, porches and doors Boundaries Shopfront and signage All sections of Undertaking Repairs and Maintenance	These sections are all accompanied by illustrations, where appropriate, as well as the use of photographs.
Paul Clarke	Examples of good and bad practice would add to any section.	The draft SPD uses illustrations to demonstrate good and bad practice, where appropriate.
Southwold Town Council (Jessica Jeans)	Buildings -- make changes. Alterations, extensions, boundary treatments, inserting new windows, gables, dormers	These sections are all accompanied by illustrations, where appropriate, as well as the use of photographs.
Theatres Trust (Tom Clarke)	Windows, porches and doors and shopfronts and signage.	These sections are all accompanied by illustrations, where appropriate, as well as the use of photographs.
Westover Landscape Ltd (Anne Westover)	Probably all of them but the historic park sketches are particularly helpful. Similarly	The section about parkland is illustrated with up to date photographs, as well as illustrations taken

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
	sketches of example non- designated heritage assets would be helpful.	from SPG6. The guidance on Non-Designated Heritage Assets does not lend itself to the use of illustrations as there are numerous Non-Designated Heritage Assets, of many different types including buildings and structures.
Wickham Market Parish Council (Joanne Peters)	Almost all of the sections would benefit from illustrations.	The draft SPD uses illustrations to demonstrate good and bad practice, where appropriate.

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

<b>Respondent</b>	<b>Comment</b>	<b>Council Response</b>
Aldeburgh Town Council (Ruth Proctor)	Will the new SPD refer to area specific policies? Will allocations in Aldeburgh be referenced and incorporated? The new Historic Environment SPD should update and strengthen guidance on climate change to reflect new guidance on flood risk and technology. This SPD should also include guidance about the provision of affordable housing and the proportion of one-bedroom housing.	<p>The draft SPD seeks to provide comprehensive guidance for the Historic Environment but does not contain any guidance that is specific to particular parts of the district or allocated sites. The guidance in the SPD would apply to proposals on site allocations where relevant.</p> <p>The draft SPD reflects the policy on conversions of rural buildings as set out in the Local Plans. The policies do not require other uses to be considered before residential and the SPD cannot introduce such a policy. The policy approach reflects the</p>

Respondent	Comment	Council Response
	<p>The section about redundant buildings should consider other alternative uses before residential conversion is permitted.</p> <p>There is concern that a single SPD for the whole of East Suffolk will lead to the loss of area specific policies, specifically about economic development in rural areas and tourism. There is concern that the approach taken in the Waveney Development Management policies towards development in rural areas is written from a more urban perspective.</p>	<p>National Planning Policy Framework policy for housing in the countryside.</p> <p>The SPD will not replace policies contained in the Local Plans. Issues concerning economic development and tourism are beyond the scope of this SPD. The Council is separately producing an Affordable Housing SPD.</p>
Bawdsey Parish Council (Andrew Rouse)	Attachment to the main response draws attention to the need to improve the energy efficiency of existing buildings, as well as improving standards for new buildings. This includes measures to ensure that buildings exceed the standards required by part L of the building regulations. Consideration should also be given to the BREEAM system of certification for new buildings.	This SPD provides information about how to improve the sustainability and energy efficiency of historic buildings. Policies in the Local Plans set requirements for BREEAM. The Council is also preparing a Sustainable Construction SPD.
Beccles Society (Paul Fletcher)	The differences between Listed buildings, buildings in conservation areas and non-designated heritage assets needs to be made clear. There is a need for cooperation and consultation, particularly between the planning department and Suffolk County	This SPD explains the differences between Listed buildings, buildings in conservation areas and non-designated heritage assets. The planning team involves Suffolk County Council as Highway Authority on plan making issues and when deciding

Respondent	Comment	Council Response
	Council Highway authority. Lack of cooperation has resulted in a proliferation of signage.	planning applications. Road signage on Listed buildings will require Listed building consent.
Easton Neighbourhood Plan (Sue Piggott)	Non-designated heritage assets should be protected to ensure that appropriate materials are used in repair. The example given is of the crinkle crinkle wall in Easton, which extends beyond the conservation area and this section does not receive the same level of protection.	This SPD explains the status of non-designated heritage asset and also provides guidance about the appropriate repair of heritage assets.
Historic England	<p>The Council is encouraged to retain the detailed advice contained within its current suite of SPGs. In particular:</p> <ul style="list-style-type: none"> <li>• There needs to be an updated list of Registered Parks and Gardens</li> <li>• There should be a comprehensive review of designated landscapes, which includes parks, town squares, cemeteries, industrial landscapes, institutional landscapes, and seaside esplanades.</li> <li>• The SPD should identify smaller sites for guidance and protection.</li> <li>• The Council should carry out condition assessments of parks and</li> </ul>	This SPD contains an updated list of Registered parks and gardens. A review of designated landscapes and parks and gardens is beyond the scope of this SPD, although the entries for individual parks and gardens have been updated. A more comprehensive review of locally designated parks and gardens could form part of a future Local Plan review, which would enable consideration to also be given to the former Waveney area which does not have a policy equivalent to that contained in the Suffolk Coastal Local Plan covering locally designated parks and gardens. The SPD retains the summary of parkland features.

Respondent	Comment	Council Response
	<p>gardens to see if they still merit inclusion on the local list.</p> <ul style="list-style-type: none"> <li>Finally, the summary of parkland features in Section 5 is very useful.</li> </ul>	
Jill Temperton	<p>The new SPD should consider the Government's Design Guide with its 'Ten Characteristics of Beautiful Places'. Well-designed new homes enhance the surrounding areas and are included in government Guidance. Recognisable streets and tree lined public spaces are also included in the guidelines.</p>	<p>The focus of the SPD is on the historic environment rather than design per se, however includes guidance to help new development protect and benefit the setting of historic buildings and spaces. Wider guidance for design is being considered through Suffolk Design which is a local authority wide project to embed high quality functional design into developments in Suffolk.</p>
Leave The Layers Alone (Peter Minta)	<p>Any potential sites being considered for development should be viewed in the context of their local and national historical importance.</p>	<p>This SPD includes guidance that helps potential development to protect and enhance historic buildings and their settings. This includes Listed buildings, non-designated heritage assets and conservation areas. The SPD will be a material consideration in the determination of planning applications where relevant, however the SPD itself does not consider proposed sites for development.</p>
Melton Parish Council (William Grosvenor)	<p>Melton Parish cannot comment any further until a full document has been produced.</p>	<p>Response noted. The full draft SPD will be available for public consultation.</p>
Paul Clarke	<p>The new SPD requires an increased emphasis on setting. Setting should be given its own chapter because greater attention to setting improves the quality of development. Change</p>	<p>The SPD includes a section providing guidance on the setting of heritage assets. Guidance includes the use of appropriate materials, as well as issues of layout, scale and detailing.</p>

Respondent	Comment	Council Response
	<p>of use leads to the requirement to accommodate more vehicles and the installation of hard surfaces. The guidance should therefore cover:</p> <ul style="list-style-type: none"> <li>• The impact of new surfaces and how this can be minimised.</li> <li>• The choice of materials, scale, layout and detailing of areas which are not part of a designated asset.</li> </ul> <p>The SPD should be broadened in scope to include discussion of all managed landscapes that surround historic buildings and not just parks and gardens.</p>	<p>The section about the setting of historic buildings is applicable to all areas that surrounding historic buildings, and not just parks and gardens.</p>
Southwold Town Council (Jessica Jeans)	<p>The new SPD should require proposals to improve the character of buildings and places. This should include reinstating lost character and responding to the best of the character area.</p> <p>The SPD should incorporate the new National Design Guide with its emphasis on beauty and delight, context and identity. Proposals affecting heritage assets should be evaluated against NDG criteria unless relevant local or neighbourhood guidance is in place.</p> <p>Southwold's built heritage is under threat from the proliferation of conversion to</p>	<p>This SPD includes practical guidance that helps to implement the historic environment policies contained in the Suffolk Coastal and Waveney Local Plans. This will help to deliver development that protects and enhances existing historic spaces and buildings.</p> <p>The focus of the SPD is on the historic environment rather than design per se. Wider guidance for design is being considered through Suffolk Design which is a local authority wide project to embed high quality functional design into developments in Suffolk.</p>

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	<p>holiday lets. Owners view their properties as an income and do not spend enough on repairs that are sympathetic to the area, for example installing UPVC windows. There is a danger that this problem could increase as other owner install UPVC windows on grounds of consistency.</p> <p>Policy should make clear that plastic replacement windows are never acceptable and cannot be justified because they have been installed elsewhere.</p> <p>In Southwold, where land values are high, it should be made clear that owners will retain and reinstate high quality wooden windows. The use of independent experts is also necessary to justify replacement rather than repair of existing windows.</p> <p>The SPD needs to state that the spaces between buildings are an important part of local character. Extensions, together with gables, doors and windows, can disrupt the urban grain and appearance of the area.</p> <p>The revised plastic window policy should be applied to all of east Suffolk and all</p>	<p>The SPD retains the key criteria of the windows policy for Article 4 areas for guidance to help property owners assess whether replacement or repair of existing windows is preferable. Proposals for replacement windows will be decided on a case by case basis. The guidance from the former windows policy will be retained in areas covered by Article 4 Directions.</p> <p>Proposals to extend apply Article 4 Directions in other parts of East Suffolk are currently being considered.</p> <p>The SPD contains guidance about the setting of historic buildings, which includes the importance of protecting and enhancing spaces surrounding historic buildings.</p>

Respondent	Comment	Council Response
	conservation areas should benefit from Article 4 Directions.	
Suffolk County Council Archaeological Service (Abby Antrobus)	<p>The existing suite of SPGs serves as a good basis for the current guidance review. The use of illustrations is useful and this should continue.</p> <p>The SPD should include reference to archaeological remains and the non-designated heritage assets criteria to link to new/emerging Local Plan policies. There may be some scope to review criteria for assessing importance set out in SPG1, such as consideration of rarity, context and legibility of progression of development of a site.</p> <p>Suffolk County Council is undertaking a project to capture information about historic farmsteads in the HER and there may be links between this project and the new SPD.</p>	<p>Guidance in the draft SPD is accompanied by photographs and illustrations.</p> <p>The SPD refers to archaeological remains but clarifies that this is in the remit of Suffolk County Council Archaeological service.</p> <p>The SPD provides guidance about sympathetic repair, alteration and conversion of redundant buildings. Assessment of the value of a barn or farmstead will take place on a case by case basis, and the guidance is framed around the criteria in the relevant policies of the Suffolk Coastal Local Plan and Waveney Local Plan.</p> <p>The SPD includes reference to the Historic Environment Record.</p>
Suffolk Preservation Society (Bethany Philbedge)	The SPD should encourage those undertaking development to engage at an early stage with the local planning authority. More specifically:	The SPD refers to registered parks and gardens and includes information about locally registered parks and gardens within the parks and gardens chapter.

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	<ul style="list-style-type: none"> <li>• The parks and gardens section should include reference to registered parks and gardens.</li> <li>• Local parks and gardens should be noted under the non-designated heritage asset section.</li> <li>• Suffolk Coastal criteria for identifying non-designated heritage assets should be used to identify more assets, rather than the Waveney Local Lists, which are limited to conservation areas.</li> </ul>	Both the Suffolk Coastal and Waveney Local Plans include a common set of criteria for identifying non-designated heritage assets and these are included in the SPD.
Westover Landscape Ltd (Anne Westover)	Please let me know if I can be of assistance in any way.	Comment noted and appreciated.
Wickham Market Parish Council (Joanne Peters)	<p>The SPD should clearly state the contribution of gardens to the landscape of conservation areas.</p> <p>Guidance about replacement windows in conservation areas is needed.</p>	<p>The SPD contains a section about development in the setting of a historic building, which includes gardens. This applies to all heritage assets, including those in conservation areas. Individual Conservation Area Appraisals will set out the contribution of gardens at the local level.</p> <p>The SPD retains guidance taken from the Waveney windows policy. This guidance enables property owners to assess whether replacement or repair is preferable. It can be used in areas that are covered by an Article 4 Direction.</p>

