Online Comment

Application	H11-0393-20
Location	London Road Long Sutton Spalding PE12 9EA
Proposal	Erection of 2 bed house

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Date Submitted	03-07-20
For/Against	Comments

Thank you for reconsulting this office on the revised Heritage Impact Statement. Unfortunately it still falls below the minimum requirements set out in both the National Planning Policy Framework (paragraph 189) and the South East Lincolnshire Local Plan (Policy 29).

Firstly, the statement fails to identify or assess the significance of the designated and non-designated heritage assets that may be affected by the proposal. This assessment should also include the contribution to significance these assets derived from their setting. In this instance it should also include characterising the significance of the surrounding part of the designated Long Sutton Conservation Area.

Secondly, the application has failed to consult the Historic Environment Record. This has led to a statement that is insufficiently informed by the available evidence. For instance "the site is clear and sits within a larger residential area with houses constructed from the beginning of the last century onwards- ". This is factually inaccurate, and ignores the evidence in the Historic Environment Record regarding the history and development of buildings in this part of the conservation area.

These are basic minimum requirements of established planning policy, and should have been carried out at the outset, prior to the design of the scheme. We would again like to draw the developer's attention to Historic England's guidance on the production of statements of this kind which states:

"what is needed is an impartial analysis of significance and the contribution of setting. A Statement of Heritage Significance is not an advocacy document, seeking to justify a scheme which has already been designed; it is more an objective analysis of significance, an opportunity to
describe what matters and why, in terms of heritage significance."

https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/
Whilst the latter is advisory best practice, we would also direct the developer to the Government's official Planning Policy Guidance on the Historic Environment, which in paragraphs six to nine explains the importance of assessing significance and using it to avoid or minimise harm and identify opportunities for enhancement.
https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-making-historic-environment

At present there is little evidence that the development has been designed with adequate consideration of the character or significance of its historic setting.

The section on design begins: "As with the redevelopment of other sites within the city, the scheme has been designed to take account of a number of factors- ". This is concerning as it further indicates the lack of attention given to the context of the site within the Long Sutton Conservation Area, which has been designated by South Holland District Council under the Planning (Listed Buildings & Conservation Areas) Act 1990 in order to preserve and enhance the area's "special architectural and historic interest."

Whilst issues around the potential impact of the design of the proposed development on the conservation area are matters for the local planning authority's conservation officer, this office cannot at present recommend that sufficient information has been provided to enable any reasoned decision to be made.

Unless the minimum requirements for development proposals affect the historic environment can be met, we can only reiterate our previous recommendation that this application should not be considered further as it is not compliant with NPPF 189 or Policy 29 of the local plan.