WHETHER THE PLAN PROVIDES A SUFFICIENTLY POSITIVE AND PROACTIVE STRATEGY FOR THE CONSERVATION AND ENJOYMENT OF THE HISTORIC ENVIRONMENT

English Heritage is the Government’s adviser on the historic environment. Our role is to champion and care for the historic environment and in terms of the development plan process, we are identified as one of the specific consultation bodies.

The coastal towns of England are extremely diverse. Their history and prosperity has been tied up in their relationship with the sea and coastline. The result is a distinctive local character. In creating strategies to equip coastal towns for the 21st century, the historic environment is an adaptable and powerful resource. It offers a platform for economic, social and environmental sustainability. Coastal resorts such as Worthing face a variety of challenges affecting the historic environment, including higher maintenance requirements arising from the effects of the weather; urban design conflicts fitting new development into planned townscape; and mitigating the effects of climate change, including accommodating new sea defences.

Our view is that the historic environment offers an excellent foundation for successful and sustainable coastal regeneration. Its offer includes architectural distinctiveness, character and identity; and an excellent medium for community regeneration and skills development.

Does the Core Strategy deal adequately with the historic environment and does it advance a sufficiently pro-active approach in accordance with Policy HE3 in PPS5?

PPS5 ‘Planning for the Historic Environment’\(^1\) sets out the Government’s objectives for the historic environment and the rationale for its conservation. It identifies the historic environment as a non-renewable resource. Its fragile and finite nature is a particularly important consideration in planning. Conserving this resource for future generations accords with the principles of sustainable development. Government places a priority on its conservation and has set out tests to ensure that any damage or loss is permitted only where it is properly justified.

There is much to commend in the Worthing Core Strategy overall, but it is disappointing when it comes to providing a satisfactory framework for management of the historic environment. In responding to the Proposed Submission Strategy we focussed on the historic environment and drew attention to inconsistency between the ‘front end’ of the Strategy and those

---

parts dealing with delivery. The Council’s Schedule of Suggested Amendments (August 2010), does not address the main elements of the representation in terms of policy content, the evidence base or monitoring and therefore affects the soundness of the strategy in terms of its justification and effectiveness.

The Vision looks for continued improvement in the quality of the historic and built environment, while Strategic Objective 6 recognises the need to retain/enhance Worthing’s distinctive characteristics, which include its heritage assets. We support this and the focus on revitalising the town centre and seafront where the historic environment will have a very significant contribution to make.

The key outcomes identified with Strategic Objective 6 include conservation and where appropriate enhancement of built heritage and heritage assets. Para. 5.13 highlights the point that the spatial strategy is intended to reinforce the high quality urban and historic environment and setting of the town, through such measures as protecting heritage and conservation areas. This is sound and consistent with national guidance.

Although there is no policy dedicated solely to the historic environment, this of itself is not critical, as long as where it is the subject of policy, it carries the force intended in the ‘front end’ of the strategy, and in doing so complies with national guidance. Policy 16 fails to effect either of these tasks adequately.

Bearing in mind the need for a positive and proactive strategy, the second paragraph to Policy 16 is cast in terms that appear ‘on the back foot’ with references to ‘where possible’ and ‘wherever possible’, and so fail to convey the importance of conserving and enhancing heritage assets consistent with national guidance. Where there is reference to preserving and enhancing assets, it comes after the word ‘local’ which may have different meanings (local as in the immediate area, or local to Worthing, or local as in significance e.g. the local list of buildings referred to in para. 8.28). This compares unfavourably with Policy 13 where there is a clear statement that biodiversity designations will be protected, even though it makes no distinction between nationally and locally important designations.

These were concerns that we drew to the Council’s attention at an even earlier stage, when we responded to the Revised Core Strategy in August 2009. At that time we said:

‘Section 8 deals with a sustainable environment and para. 8.1 states that the key aims of the section are to ensure that the natural environment is protected and enhanced and that new development helps deliver sustainable, high quality communities. Policy on the natural environment is very clearly stated in Policy 12 – the biodiversity and natural habitats of the Borough will be protected and where appropriate, enhanced. The policy goes on to refer to mitigation where there is harm to that environment. Notwithstanding that PPS1 looks to the protection and enhancement of the natural, built and historic
environment in an integrated way, the latter appears to receive far less recognition in Policy 15 of the Core Strategy. It states that buildings of historic character should be maintained ‘where possible’, while local assets should be preserved and enhanced ‘wherever possible’. This falls short of what is required by PPS1, the draft PPS15 and Policy BE6 of the South East Plan. There is no equivalent of para. 8.3 (importance of protection/enhancement of areas important to the natural environment) in the explanatory text supporting Policy 15. Archaeology does not appear to feature in the strategy, a point mentioned in our response to the earlier submission Core Strategy (e.g. Cissbury Ring is a scheduled ancient monument as well as SSSI – para. 8.4 refers) and PPG16 has not been taken into account in Appendix 2 of the Sustainability Appraisal.

PPS5 Policy HE9 makes clear that once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed, or lost, through alteration or destruction of the heritage asset, or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments,14 protected wreck sites, battlefields, grade I and II* listed buildings and grade I and II* registered parks and gardens, World Heritage Sites, should be wholly exceptional. This is not conveyed by Policy 16 as written.

Given the wealth of heritage assets in Worthing and the particular contribution these make to its character and distinctiveness, and having regard to s38(6) of the 2004 Act, we see the need for a policy that protects and enhances such assets, together with their settings, in a way that draws upon local circumstances (the resort townscape, contribution to regeneration/tourism, heritage assets at risk).

Is the Core Strategy approach to the historic environment adequately supported by the evidence base?

English Heritage’s representation on the proposed submission Core Strategy referred to national policy guidance PPS5 and the associated Good Practice Guide in the use of the evidence base in preparing development plans. We do not repeat that here, except to draw upon the Guide where it states at para. 30

‘The evidence base will be needed:

1. For sustainability appraisals, Strategic Environmental Assessment and testing the soundness of regional and local planning documents.
2. To understand how areas have developed their character.
3. To assess an area’s capacity for change, including the size and rate.

4. To identify where there may be opportunities to utilise the historic environment to achieve economic vitality and sustainable communities (by virtue of the factors in HE3.1).
5. To ensure that the historic environment resource is not inadvertently diminished by ill-informed development.
6. To identify where there are heritage assets at risk that need to be targeted in planning or regeneration proposals.
7. To assess the need for site, asset type or area specific policies for the conservation and enjoyment of the historic environment (without repeating the policies in the PPS).

and at para. 31

'A good evidence base will lead to robust plans and minimise the risk of challenge.'

While the Core Strategy contains references to the historic environment in the round, particularly in relation to the seafront, there is relatively little by way of identifying its key components and their significances. PPS5 looks to ensure that the evidence is publicly documented, although in this case, there is an absence of signposting of the evidence. For example, it is not included in Appendix 4.

We are mindful of PINS guidance ‘Local Development Frameworks: Examining Development Plan Documents: Learning from Experience’, September 20093 where at para. 36 the point is made that the examination is not into the evidence base in its own right, but into its adequacy in supporting proposals in the Plan. Para. 37 of the same document suggests that in a typical core strategy the background spatial and planning context should be in the evidence base. Signposting throughout the DPD text (e.g. through use of footnotes) is suggested.

The Council’s Schedule of Suggested Amendments (August 2010) includes additions to the evidence base ‘to update and for completeness’, but there is nothing specific in relation to the historic environment and our representation on the Proposed Submission Core Strategy.

The Council’s Planning website includes a section on LDF evidence base including ‘background studies’ – there is no specific section relating to the historic environment. One of the links is to the ‘Core Strategy Submission Draft Evidence Base, with a cover dated October 2007. It states on page 4 that this Evidence Base document will provide the support to complement and help justify the policies set out in the Core Strategy. The section headed ‘Sustainable Environment’ and specifically policies ENV2 ‘Local Landscape Character Area and ENV3 ‘The Built Environment & Design’ offer the best prospects, but the only references to the historic environment relate to PPGs

– not evidence of nature of the local historic environment and how it contributes to the Core Strategy.

The second paragraph of Policy16 appears as the key policy guidance specific to the historic environment. If the evidence base is not to be found in the Appendix, one might expect to find it in support/explanation to this policy, but para. 8.36 is distinctly limited.

There is no doubt that the Council has access to and uses a significant body of evidence in relation to the historic environment, but the extent to which it has informed the Core Strategy remains opaque, despite the attention given to this aspect in national guidance on plan preparation. This, in part at least, may help to explain a weak set of indicators to monitor achievement of the strategic objectives.

Are there sufficient indicators and targets to adequately assess the success of the Core Strategy approach to the conservation of the historic environment?

The Planning Practice Guide referred to above, states at para. 50, that plans with clear and measurable historic environment objectives and targets are likely to deliver more effective outcomes.

Monitoring these outcomes can have beneficial effects of: improving future plans and strategies; identifying where Article 4 Directions may be needed; highlighting where supplementary planning documents may help; highlighting where development outside of planning control, such as highways, is compromising the strategic objectives.

The Planning Practice Guide also refers to Heritage at Risk information as an effective means of assessing whether the protection policies are achieving success. Planning policy is also geared to increasing enjoyment of, and access to, the historic environment, which opens up another potential raft of targets and indicators. All this information has value in both plan preparation and monitoring. English Heritage Guidance ‘Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment’ discusses at some length the value of meaningful information. For example, it is important that the historic environment is broadly defined. It is recommended that all designated historic assets be considered together with non-designated features of local historic or architectural interest and value, since these can make an important contribution to creating a sense of place and local identity. A pre-publication copy of the SEA/SA guidance was sent to the Council when we responded to the Revised Worthing Core Strategy consultation in August 2009.

English Heritage’s annual series of national and regional reports, *Heritage Counts: State of the Historic Environment* include a suite of data sets for

---

monitoring the extent, size and quality of the assets that comprise the historic environment. We recommend that these be supplemented, where possible, by locally derived indicators. For each baseline indicator enough information is needed to answer the following questions:

- How good or bad is the condition or quality of heritage assets and places? Do trends show that it is getting better or worse?
- How far is the current situation from any established thresholds or targets?
- Are particularly sensitive or important elements of the historic environment affected?
- Are the problems reversible or irreversible, permanent or temporary?
- How difficult would it be to offset or remedy any damage?
- Have there been significant cumulative or synergistic effects over time? Are there expected to be such effects in the future?

In devising historic environment indicators for the appraisal or monitoring of the significant effects of a DPD, English Heritage recommends that:

- the indicators relate to the accompanying objectives/sub-objectives (decision-making criteria);
- the indicators are appropriate and relevant to the level and subject of the plan under consideration;
- the indicators address positive and negative effects;
- use is made of both qualitative and quantitative data;
- the indicators are kept under review as new data sets become available and or new issues are identified; and
- accompanying targets are included.

Further suggestions on a range of indicators can be found in our SEA/SA Guidance referred to above (pages 9 & 10).

Having regard to the above, we feel that the Submission Core Strategy is weak in terms of targets and indicators for the change to the historic environment. Appendix 1, Strategic Objective 6 – Deliver High Quality Distinctive Places identifies two local indicators, namely demolition of statutory listed buildings and the number of up-to-date conservation area appraisals. The target for the former is zero and there is no target for the latter. The Heritage at Risk campaign is designed to identify those significant heritage assets that require particular attention. In the case of Worthing, the Heritage at Risk Register for South East England 2010\(^5\) identifies the following three assets at risk:

Castle Goring – a Grade I Listed Building in very bad condition, built by Shelley’s grandfather Sir Bysshe Shelley, about 1797-1798. The condition is described as very grave, and enforcement action for repairs must now be considered.

Goring Conservation Area – described as at risk and deteriorating.

The Dome Cinema – a Grade II* Listed Building is described as an early example of a leisure complex built in 1911, in need of extensive repair (although repair and enhancement is recorded as nearly complete).

We welcome the Council's proposal on the Schedule of Suggested Amendments (August 2010) to include reference to Castle Goring and the Conservation Area being on the At Risk Register in relation to para.6.14, but surely this lends itself to be part of the monitoring of the strategy as an example?

We note that the evidence base and monitoring form part of the Inspector’s examination of Issues 12 and 13. We do not wish to add to this submission in respect of these two Issues.