

From: Collett, Christopher

Sent: 08 April 2020 11:21

To: Toole, Joseph

Subject: RE: APP/20/00140 - 28 North Street - Conservation Team Response [CJ-WORKSITE.FID545121]

Dear Joseph

Further to our conversation, please find a response to the comments raised by the Conservation Officer.

The setting of the heritage asset is already significantly compromised by the road infrastructure and surrounding development. The plethora of other signage including a multitude of illuminated shop fascia signs, in the immediate surrounding area mean that the proposed display would not appear out of place in what is a commercial location.

Historic England's Historic Environment Good Practice Advice in Planning: 3 (March 2015) guidance was produced on behalf of the Historic Environment Forum to provide information on good practice, reinforces the well-established concept that some views can contribute more to understanding the significance of a heritage asset than others. This is because the appreciation of relationships between the asset and elements in the view may be particularly relevant. That is almost inevitably the case where there are intentional sight lines or inter-visibility between heritage assets, or between heritage assets and natural features. Such views are part of the design of the asset and can therefore make a particularly important contribution to its significance. Conversely, however, there may be a multitude of 'incidental' views which do not make a particular contribution to an asset's significance – or indeed not at all in some instances, where they may be described as detracting features. In this case the relative value, or contribution, of the existing situation is a critical factor to be taken into account. That is to say, a change proposed to an aspect of the heritage asset's setting that is plainly of little or no value, and that makes little or no material contribution to its significance, would not affect its significance in the same way as, for example, an aspect of its setting that does make a positive contribution to or reinforce their significance.

The Historic England guidance document notes, in Section 4.1, that the protection of the setting of heritage assets need not prevent change. The document also recognises that not all heritage assets are of equal importance and states that the contribution made by their setting to their significance will also vary. In terms of the assessment, the most important part of the guidance appears in and after paragraph 10, where a stepped approach towards assessment is advocated. The stepped approach makes the significance of the heritage asset the object of the assessment (in Step 2), and not the proposed development. This is important because it means that the significance of the asset is the first and foremost consideration, not the type, form or the relative visibility of the proposed development. Step 3 is also important in making it clear that a proposed development should be assessed in terms of the impacts on the significance of the asset, not the scale of change. That is to say, the degree of visibility of the development or the degree of change to the setting of an asset is not the critical consideration.

Instead the critical consideration is the extent to which the heritage asset's archaeological, architectural, artistic or historic interest may be affected. Views of the heritage asset would not be unduly affected due to the general commercial nature of the surroundings, whereupon there is an abundance of fascia advertising along with street furniture in situ. As such, the proposal complies with the Historic England Guidance in this regard.

As the proposal proactively seeks to upgrade and improve the existing advertising site it can reasonably be concluded that the impact would be seen as having a positive effect on amenity. The replacement display seeks to mimic the existing poster display and will be adjusted on site to a comparable level of luminance. It should be noted that there is no commercial imperative for overly bright screens and there is a cost associated with displays that are run at higher levels of luminance. As such, the displays will often run at a level well below the

maximum guidelines set by the ILP. Should the Council consider a condition to be justified to enforce a lower luminance level or a curfew to further protect the amenity, the applicant will give this due consideration.

We would be grateful if you can give this application further consideration in view of the above.

Best regards
Chris

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