

## SOUTH EAST REGION

Ms Karen Philips  
Hastings Borough Council  
Aquila House  
Breeds Place  
Hastings  
East Sussex  
TN34 3U

Direct Dial: 01483 252075  
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Our ref: L00079685

8 December 2011

Dear Ms Philips

**Notifications under Circular 01/2001, Circular 08/2009 & GDPO 1995  
FORMER HASTINGS COLLEGE OF FURTHER EDUCATION, ARCHERY ROAD, ST  
LEONARDS-ON-SEA, HASTINGS, EAST SUSSEX  
Application No HS/LB/09/00484**

We have received amended proposals for the above scheme. We do not wish to comment in detail, but offer the following general observations.

### **English Heritage Advice**

As previously stated, in my letter of 1 August 2011, it is not necessary to consult English Heritage on an application that affects a Grade II listed building unless the proposed development involves the demolition of external structural walls or the removal of an internal staircase that contribute to the special character of the building, which is not the case here. You should, however, be guided by your own conservation specialist adviser as to the acceptability of the proposals in respect of their affects on the significance and character of the listed building.

I am aware that amendments to the planning application (Ref. HS/FA/09/00482) for proposed redevelopment of the Former Hastings College site were submitted at the same time as the listed building application in the form of a revised Design and Access Statement and a new Heritage Impact Assessment, but we have no record of a separate notification of the revisions to this application. This may be an error or you may have intended that the current notification was to include notice of the changes to the planning application also; either way I have taken this opportunity to assess the revisions to the redevelopment proposals in the light of our earlier comments of concern about their impacts in my letters of 1 August 2011 and 16 October 2009.

My view is that while there is additional justification provided for the proposals, and this now better reflects the requirements of PPS5 Planning for the Historic Environment to support applications with a statement of heritage significance that assesses the impacts on the heritage assets affected by development proposals, there appear to be



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no changes to the scheme that fully or adequately address the main concerns raised in my earlier letters. I acknowledge and welcome the changes to landscaping and the reduction in the hard-surfacing within the site that is now proposed, but there remains a potential for a significant harmful impact on the character and appearance of the conservation area to arise from the height and bulk of the residential blocks at the north-west end of the site. While some changes have been made to the detailed design of the taller buildings, there is little change to the overall scale of the larger blocks, such as Block A and Block B, such that the negative effects that they will have on the character of the conservation area that I raised previously are not adequately addressed in the revised scheme. These buildings in particular remain out of scale with the immediate site and the wider surroundings and, despite claims in the Design and Access Statement to the contrary, will have a significant harmful impact that will detract from the character and appearance of the conservation area. They certainly would not achieve the positive enhancement to the conservation area that is required by Policy HE.7.5 of PPS5.

### **Recommendation**

We urge you to address the above issues, and recommend that this application be determined in accordance with national and local policy guidance, and on the basis of your expert conservation advice. It is not necessary for us to be consulted again. If you feel you need further advice, please let us know why.

Please re-consult us if there are material changes to the proposals beyond those necessary to address the issues we have raised. We will then consider whether such changes might lead us to object. If they do, and if your authority is minded to grant consent, you should notify the Secretary of State of this application in accordance with Circular 08/2009.

Yours sincerely

### **Alan Byrne**

Historic Areas and Planning Advisor

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