



Historic England

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By email only to planning.policy@shepway.gov.uk

Dear Sir / Madam

Shepway Places and Policies Local Plan Submission Draft for Consultation (Regulation 19)

Thank you for your email of 1 February 2018 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.

Historic England is primarily concerned with those aspects of the draft plan relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF paragraph 126). We are concerned also with the impacts that potential development may have, for instance through site allocations or site specific policies, on heritage assets within the district particularly those that are of national significance and are designated as such as listed building, scheduled monuments, registered parks and gardens, etc.

A number of changes have been made to the text of both policies and supporting comments, especially in respect of Chapter 17 Historic Environment, since Historic England last commented on the draft local plan (ref. HE letter of 18 November 2016). These revisions, on the whole, strengthen the historic environment purposes of the Plan and we welcome them on that basis.

We remain concerned that, while progress has been made on the Heritage Strategy being prepared by Kent County Council Heritage Service and behalf of Shepway District Council, there is still a deficiency in the evidence base for the policies in the plan in relation to the historic environment. This will inevitably be seen as a weakness in the policy framework for both the allocation of sites for development and the assessment of development proposals.

In one particular respect, Historic England has a fundamental objection to the draft submission local plan; this was first highlighted in our representations on draft Policy UA25 of the Regulation 16 draft Local Plan in our letter of 18 November 2016, in relation to Princes

Parade Site, Hythe. This proposal is now included as Policy UA18 of the Submission draft Local Plan and is largely unaltered from the earlier version (i.e. former Policy UA25) with two small additions, and does not reflect the representations made by Historic England at that earlier stage of plan preparation.

Two points are added into UA18 that appear to be intended to provide ‘heritage benefits’ as a result of development of the site. There is a new sentence inserted (point 4) regarding design of new buildings “drawing on” the Royal Military Canal and retaining views of it; and, inclusion (point 9) of works to the northern bridleway which is part of the scheduled monument itself (and would be, therefore, subject to separate Scheduled Monument Consent requirements and could not be delivered directly by the development). We do not, however, agree that development of the site in the form proposed is the only way to secure such possible improvements to the Royal Military Canal and its setting. The limited heritage benefit that might be delivered by these improvements would not outweigh, in our view, the very serious harm of such major development within the setting of the scheduled monument.

We are concerned that there is a fundamental contradiction in the draft plan in that the effects of the implementation of Policy UA18 is at odds with the strengthened policies with regards to the Historic Environment in Chapter 17. We cannot see how the delivery of the former can achieve the intentions of the latter, as the development proposed is inherently inimical to the preservation of the heritage asset and its setting.

Since the previous draft plan consultation we have been consulted on the Council’s planning application for Princes Parade. Historic England has consistently set out its fundamental concerns about the impacts on the Royal Military Canal of the proposed development of this site during both pre-application and formal application stages, culminating in our letter of 26 October 2017 raising a strong objection to the development as proposed. The Council could not be in any doubt that the continued inclusion of this site in the draft local plan for the amount and form of development envisaged would result in an in principle objection by Historic England. We are disappointed that our considered, expert advice has not, apparently, been taken on board account by the Council.

In summary, in general terms while we accept that the draft local plan has the potential to provide a good basis for the conservation and enjoyment of the historic environment and heritage assets as required by the NPPF (para 126) and could provide a strategy for enhancing the historic environment (para 157), this is seriously undermined by the lack of a sound evidence base for the historic environment and, in particular, by the inclusion of policy UA18 that promotes development that is fundamentally harmful to a specific, nationally significant and unique heritage asset. On this basis Historic England cannot support the Shepway Places and Policies Submission draft Local Plan and believes it to be inconsistent with national policy and to be unsound.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.



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Yours sincerely



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