

Folkestone & Hythe District Heritage Strategy

Appendix 4 SHLAA Assessment

Appendix 4 - Heritage Strategy and the Strategic Housing Land Availability Assessment (SHLAA).

1 The Places and Policies Local Plan (Submission Draft February 2018) set out forty three preferred options for place based policies across the three identified district character areas: Urban (nineteen), Romney Marsh (fourteen) and the North Downs (ten). In addition alternative options considered as part of the site allocation process are included in Appendix 1 of the Plan. The allocation of these sites follows the assessment of over two hundred sites in the Strategic Housing Land Availability Assessment. As part of the Heritage Strategy study the vulnerability of all these sites were assessed, comparing their potential effects against the heritage themes. This was then used to take into account heritage considerations in site selection and to develop site specific policy guidance which will help to ensure that the assets can be appropriately protected, incorporated and utilised in future development.

2 Given the large number of sites that needed to be assessed, a methodology based on a scaled approach was used that had been successfully used elsewhere in Kent for local plan allocations. This involved a rapid GIS based review of each of the sites against the Historic Environment Record and other readily available records including historic maps. The potential impact of the reviewed sites on each of the heritage themes was scored using the five-point scales set out below.

Themes – General Approach

Scale	Comment
1	Proposed site includes a significant asset and development is likely to have a major impact which should be avoided
2	Proposed site includes a significant asset and development is likely to have a significant impact or is very close to an asset and likely to significantly affect its setting – further, more detailed assessment is needed prior to a decision
3	Development of the proposed site is likely to have some impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission
4	Development of the proposed site is likely to have some minor impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission
5	No issue identified

Archaeology

Scale	Comment
1	Archaeology should be avoided in part or completely
2	Further assessment of the impact on archaeological remains required prior to decision
3	Archaeological mitigation can be accommodated through planning conditions (greater)
4	Archaeological mitigation can be accommodated through planning conditions (lesser)
5	No issue identified

Conservation Areas

Scale	Comment
1	Within and directly impacting a Conservation Area
2	Adjacent to a Conservation Area – setting issue
3	Close to a Conservation Area – setting issue
4	Distant from a Conservation Area – maybe some setting issue
5	No issue identified

Built Heritage & Listed Buildings

Scale	Comment
1	Listed Building or a built heritage asset and/or its setting will be directly impacted by development
2	Adjacent or very close to a Listed Building or built heritage – major setting issue
3	Close to a Listed Building or built heritage – setting issue
4	Distant from a Listed Building or built heritage – maybe some setting issue
5	No issue identified

3 It is important to note that the scoring is based only on a rapid desk-based examination of the site and is not supported by site visits or more detailed analysis of the site. It is also important to understand that the scoring is not necessarily seen as a constraint but a means of flagging an issue of sensitivity that should be taken

account of with regards to development of the site. It may be possible to develop a site in a way that avoids or lessens impact on the significance of a heritage asset though this will need to be appropriately assessed and demonstrated when bringing forward proposals, particularly on sites of greater sensitivity and importance.

4 Many of the sites include a range of areas of different sensitivity within them and for the purposes of the present study, which has not had the benefit of knowing the nature of development on a particular site, the default has been to apply the most sensitive (lowest scoring) to the site as a whole.

5 It should be appreciated that a single historic asset may be covered twice or more in the scoring as several themes (particularly the asset type ones of archaeology, built heritage and Conservation Areas) are cross cutting. For example a site that includes a Scheduled Martello tower in or close to a Conservation Area could be scored on four themes - 'Archaeology', 'Built Heritage', 'Conservation Areas' and 'Napoleonic Defences'.

6 For the two hundred and four sites assessed the following table summarises the scale of vulnerability for each theme. For each site an overall score was also assigned as was a score based on the Shepway Strategic Housing Land Availability Assessment flagging of Red / Amber / Green. The detailed assessment is set out in the spreadsheet below in Appendix 4.

Theme	Scale 1	Scale 2	Scale 3	Scale 4	Scale 5
General Historic Landscape	0	2	12	34	156
Romney Marsh	0	5	17	16	168
North Downs & Greensand Vale	0	1	6	11	186
Dungeness	0	0	0	1	203
Coastal	0	0	6	5	193
Early Harbours	0	0	3	1	200
Cinque Ports	0	0	2	1	201
Folkestone Cross Channel Port	0	0	0	1	203
Folkestone & Sandgate	1	1	0	3	199
Dymchurch & St Mary's Bay	0	0	0	5	199
RH & D Railway	0	0	6	8	190
Fishing	0	0	1	2	201
Wrecks	0	0	0	0	204
Safeguarding the Coast	0	0	1	2	201
Defence - General	0	0	2	0	202
Castles	0	3	5	2	194
Napoleonic Defences	5	2	2	1	194
Great War	1	1	1	5	196
Second World War	1	5	11	17	170
Camps & Training Grounds	0	2	0	12	190
Church	0	2	3	3	196
Settlement	1	0	8	17	178

Agriculture & Farmsteads	0	1	14	37	152
Parks, Gardens & Estates	0	1	10	2	191
Archaeology	3	6	120	59	16
Built Heritage	7	19	21	20	137
Conservation Areas	7	13	13	8	163
KCC Overall Score	17	29	109	43	6
Shepway SHLAA Score	7 Red		191 Amber		6 Green

7 The work has proved to be a useful tool for both flagging up the impact of specific sites on the district's heritage assets and for providing an overview as to how the allocation sites will generally affect the district's key heritage themes. Some of the findings are considered below.

8 One of the most striking results of the assessment can be seen from the overall scoring. Of the two hundred and four proposed development sites only six (3%) were found to have no identified heritage issue. Seventeen (8%) were flagged as presenting a heritage impact that should be completely avoided and twenty nine (14%) where further assessment would be needed to inform a decision on allocation and development. The remaining substantial majority (75%) had heritage vulnerabilities that could be dealt with through conditions and mitigation. A large proportion of this is on undesignated heritage. This has clear implications for development in the district whether through the allocations or otherwise:

- Heritage is almost certainly going to be an issue that needs to be addressed in most development proposals and it is important therefore that suitable heritage statements are routinely provided with planning submissions and are a requirement of validation.
- The District Council has available to it advice that can assess and advise on the impact of development on its heritage.
- That the heritage impact may be more widespread on the district's non-designated heritage assets and it is important that these and their significance to the district are recognised when proposals come forward. A local list of non-designated heritage assets would be a useful means of flagging up key assets.

9 Archaeology or the potential for archaeology is considered to be vulnerable on most of the proposed allocation sites though this can mainly be dealt with through conditions that require evaluation, investigation and recording that will help to better understand Shepway's rich past. The three sites with the most sensitivity include:

- Heritage assets that would be directly impacted within the site including in one case a Scheduled Monument of a pill box and bronze age barrow.
- Another included an extant but undesignated bronze age barrow; and
- the third a complex of possible moats and earthworks.

10 Other sites have been scored at '2' which identifies that there is a strong potential for remains that would warrant preservation on the site but that further information is needed before a decision can be reached.

11 The most sensitive sites flagged for 'Built Heritage' include a number containing Listed Buildings or being within the setting of assets such as Lade Fort and Westenhanger Castle. Others included the remains of defence structures at Lympne and the remains of Lydd Station. Meanwhile around another 29% of the proposal sites flagged a vulnerability where the sensitivity of the setting of built heritage assets will be a consideration to a greater or lesser extent. Similarly, with Conservation Areas, only seven sites, mostly in the Leas and Bayle Conservation Area, fell within the designated area though another thirty four sites (16%) lay within the setting which was a consideration in the assessment. This clearly illustrates that:

- While sites may contain significant built heritage assets or lie within Conservation Areas, far more can fall within the setting of these;
- Assessment of the impact on the setting of heritage assets should be considered in heritage statements;
- To achieve this there is a need to understand the setting of heritage assets and how their significance can be affected. It is important to recognise when setting is or may be an issue so that appropriate assessment can be required and advice taken in making a decision.

12 Across the themes the greater vulnerability from the assessed sites is on the district's defence heritage. Napoleonic defences are particularly vulnerable at the higher end of the scale reflecting proposals in proximity to the Royal Military Canal, the Dymchurch Redoubt and Lade Fort. Second World War assets are also frequently found to be sensitive to the proposals. Although Second World War defences are known to be widespread through the district the relatively higher number that are vulnerable to the allocations may also be a product of more information being readily available on the Historic Environment Record from projects such as Defence of Britain.

13 The methodology employed in assessing the sites by theme may have wider applications in the development management process. Its incorporation as a checklist into guidance for Heritage Statements could help to ensure that a more robust approach to these is readily developed. By using a thematic approach in the assessment of a proposal there is a strength in better understanding the significance of the heritage as a whole, how different types of heritage assets work together and how the undesignated heritage assets can contribute to the overall significance of the heritage.