



Historic England

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Date 12 December 2024

Dear Sir or Madam

Southbourne Allocation Development Plan Document - Regulation 18 Consultation

Thank you for your email of 31 October 2024 advising Historic England of the Council's Southbourne Allocation Development Plan Document consultation.

General Comments

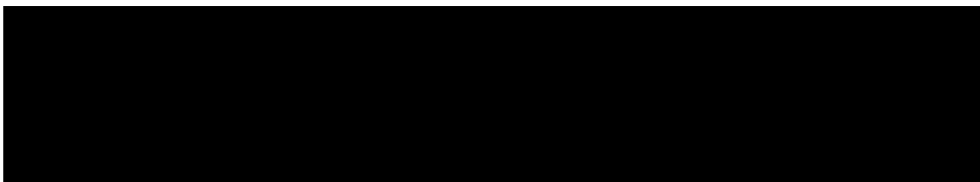
Historic England sets out its comments on the relevant specific questions in the consultation document below but would remind the Council of the need to have regard to potential impacts on the historic environment when assessing sites for allocation for development. The National Planning Policy Framework paragraph 189 explains that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.

Historic England expects the policies and proposals of local plans, including development site allocations and the methodology for selecting these, to be based on an adequate, up-to-date and relevant evidence base for the historic environment. We would expect that the consideration of impacts on the historic environment has informed the choice of allocation site scenarios in the consultation document but cannot identify any evidence of this.

Information on designated heritage assets can be found on the National Heritage List for England (<http://list.historicengland.org.uk>) and on non-designated heritage assets from the Historic Environment Record. Other potential sources of information include the County Historic Landscape Character Assessment and Conservation Area Character Appraisals.

A detailed methodology for the assessment of the potential impact of possible sites on heritage assets should include the following factors:

- All heritage assets should be considered encompassing buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest (archaeological,



architectural, artistic or historic). These include designated heritage assets and other assets identified by the local planning authority (including local listing).

- Implications of development (positive and negative) for the setting of a heritage asset and its significance should be considered.
- The potential archaeological interest of a site.
- In considering implications for landscape and townscape character, relevant information on the historic character of places should be utilised for example historic landscape characterisation, historic environment assessments, historic area assessments, extensive urban surveys and conservation area appraisals, and other historic characterisation studies.
- The specific consideration of settlement character may also be appropriate, as for example whether development would significantly alter the historic settlement pattern (positively or negatively).

Historic England's Historic Environment Advice Note 3 contains advice on site allocations in local plans, including the steps that should be taken during the site selection process with regard to the historic environment and heritage assets:

<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

Specific Comments (i.e. Questions)

Q1. Do you agree with the vision and objectives set out? If not, please set out how you think they should be amended. We are disappointed that there is no reference within the vision to Southbourne's historic environment and numerous heritage assets. In view of the general comments above, we believe this is a weakness of the approach to planning the site in that the heritage significance of the proposed locations for development (both actual and potential) is not identified as a key characteristic of the area that may be impacted by allocation of land for development.

Q6. Are there other benefits and challenges that you feel should also be included? In Scenario 2: Land to the East option there is potential to impact on two designated heritage assets (Thatchways and Loveders Farm, both grade II Listed Buildings) and their settings. This 'challenge' should be recognised within the policy.

Q9. Are there other benefits and challenges that you feel which should also be included? In Scenario 3: Mixed Scenario, which to some extent mirrors Scenario 2, there is potential to impact on two designated heritage assets (Thatchways and Loveders Farm, both grade II Listed Buildings) and their settings. This 'challenge' should be recognised within the policy.

Q10. Which scenario do you feel should be selected as the preferred option for allocation? Please rank from 1st (most preferable) to 3rd (least preferable). While Historic England would not wish to rank options, it is likely that Option 1 would have least direct impact on designated heritage assets. Without the support of a robust historic environment evidence base, however, it is not possible to ascertain the scope of potential impacts on the

full range of heritage assets (as indicated in the General Comments above). While it is possible that such effects appropriately may be assessed within the Sustainability Appraisal it is necessary for the DPD to be found sound that the outcome of such assessment is reflected in the policies and supporting text.

Summary

In conclusion, in the view of Historic England the draft Southbourne Allocation Development Plan Document is deficient in its understanding of the significances of the historic environment; fails to identify potential impacts of the development options on designated heritage assets (in Scenario 2 and Scenario 3); and, as currently drafted lacks the evidence and appropriate assessment of historic character and heritage significance to underpin a sound plan.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours faithfully,

[Redacted Signature]

Historic Environment Planning Adviser