

This Report will be made public on 4 December 2018.

Report Number **C/18/57**

To: Cabinet
Date: 12th December 2018
Status: Key Decision
Head of service: Dr Sarah Robson, Assistant Director - Strategy, Performance and Communications
Cabinet Member: Councillor John Collier

SUBJECT: Folkestone & Hythe District Heritage Strategy

SUMMARY:

The Heritage Strategy is an evidence base document for the Places and Policies Local Plan and Core Strategy Review and it will also provide information for planning applications and funding bids. It sets out positive objectives and priorities to ensure the district's heritage assets provide a unique opportunity for future place-making, guiding and stimulating regeneration and making significant contributions to recreation, tourism, health and education.

The views of a large and enthusiastic group of stake-holders, individuals and groups were gathered during the initial stages the strategy's production. It is now proposed that the draft Strategy is published to provide an opportunity for interested groups and individuals, businesses, landowners, developers and the wider public, to shape the final version.

REASONS FOR RECOMMENDATIONS

The Heritage Strategy is an evidence based document for the emerging District Local Plans and has been produced following extensive informal engagement with interested groups and individuals. A final formal public consultation would help ensure the final version carries greater weight.

To ensure that the Strategy can be given greater weight further public consultation is necessary.

RECOMMENDATIONS:

1. To receive and note report C/18/57.
2. To give delegated authority to the Planning Policy Manager to make any amendments that may be necessary to the Folkestone & Hythe District Heritage Strategy following recommendations of Cabinet;
3. To agree the publication of the Folkestone & Hythe District Heritage Strategy for public consultation subject to recommendation 2 above.

1. BACKGROUND

- 1.1 The National Planning Policy Framework (NPPF, July 2018) states that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (paragraph 185). As the NPPF makes clear, heritage can bring social, cultural, economic and environmental benefits and make a positive contribution to the character of a place. It also places importance on having a solid and robust evidence base for local plans and decision making. Any evidence gained through policy-making should also be publicly accessible.
- 1.2 The adopted Core Strategy Local Plan (2013) recognises the importance of the historic environment in the Strategic Need B, '... to enhance the management and maintenance of the rich ... historic assets ...' in the district. This is taken forward into the Core Strategy Review currently in preparation. The draft Heritage Strategy has also underpinned the policies in the Historic Environment chapter of the emerging Places and Policies Local Plan.
- 1.3 A key priority in the District Council's Corporate Plan (2017-2020), under the 'Appearance Matters' strategic objective, is to 'maintain and improve natural and historic assets' by providing landscape and urban design advice in order to achieve high quality places to live and work.
- 1.4 The Heritage Strategy seeks to apply the high-level guidance contained within the NPPF and articulate this for the district, providing a positive strategy for the conservation and enjoyment of the historic environment.
- 1.5 The views of a large and enthusiastic group of stake-holders, individuals and groups were gathered during the initial stages of the Heritage Strategy production through workshops, one-to-one meetings and phone calls.

Summary of the Strategy

- 1.6 The Heritage Strategy is set out in two parts, the Strategy and the Appendices.

Strategy

- 1.7 The Strategy is split into ten sections. These are an introduction, a summary of the heritage in the district, the main heritage themes, and the activity currently in the district, the opportunities and the vulnerability of the assets. It also sets out the stakeholder engagement that has been undertaken and how to take the Heritage Strategy forward, setting out four objectives and eleven 'priorities'.

Appendices

- 1.8 The Appendices set out each of the identified heritage themes in detail (thirteen in total), five case studies, and the assessment of submitted residential sites for the Strategic Housing Land Availability Assessment

(SHLAA) that has informed the allocations in the Places and Policies Local Plan. Due to the size of the Appendices, these can be viewed at this on the District Council's web site¹. These are envisaged to be an online source of information.

Theme papers

- 1.9 Themes have been identified (through the preliminary work and consultation) as the heritage is exceptionally rich, varied and extensive in the district and this approach enables a mixture of asset types to be brought together. A theme-based approach also helps explain the contribution of undesignated heritage assets and it allows broader links to be made across activities to enable co-ordinated effort, promotion and project development. The theme papers set out a description, vulnerabilities and opportunities, current activity and the 'significance' of the heritage assets (thus providing a starting point for Heritage Statements to accompany future planning applications).

Case studies

- 1.10 The five case studies aim to illustrate how the Strategy could be used. These are:
- Folkestone Racecourse;
 - Folkestone Creative Quarter & Folkestone Townscape Heritage Initiative (FTHI);
 - Royal Military Canal;
 - Dungeness; and
 - Heritage & Health.

The main issues identified

- 1.11 There is an extraordinary rich history in the district and this is reflected in a vast and diverse wealth of heritage assets. Reflecting this, the Strategy has identified a large number of very active heritage-related groups and other stakeholders, extending across the heritage themes and throughout the district. (It should also be noted that there were a large number of heritage-related comments to the consultations on the Places and Policies Local Plan and Core Strategy Review earlier this year.)
- 1.12 The Strategy has identified that heritage can play a positive role in the district's future. It can be a catalyst for economic and social regeneration, in realising tourism and contributing to improved health and wellbeing.
- 1.13 The Strategy, however, also identifies eleven generic and specific activities, processes and issues that can have a detrimental impact on heritage assets. These include: natural processes; new developments without the relevant information; poor accessibility; lack of coordinated efforts; and lack of funding and resources.

¹ <https://www.folkestone-hythe.gov.uk/planning-policy/local-plan/places-policies/evidence>

The Recommendations of the Strategy

- 1.14 From the analysis of research, consultation and feedback, the Strategy suggests four broad Objectives to take forward:

Objective 1 - Leadership

The District Council to play a leading role in championing and promoting the rich heritage of the district and supporting heritage-related activity.

Objective 2 - Heritage Management

The district's heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance; ways are developed to help manage, inform and guide the process of change in the district.

Objective 3 - Place Shaping

The district's historic environment and heritage assets are used to shape development, regeneration and place-making.

Objective 4 - Capitalising

The district realises the economic and social potential of its rich historic environment, heritage assets and heritage activity.

- 1.15 To deliver the Objectives the Strategy has identified eleven priority actions that aim to meet the four broad objectives. The Strategy does state that it would be unrealistic to expect that all of these would be addressed in the short term and that for some, progress is already being made. The priorities are set out in the draft Strategy attached (Appendix 1).
- 1.16 The priority actions propose that District Council helps to co-ordinate projects with heritage groups. It also suggests that the District Council provides information, such as guidance or identifying any heritage assets of local interest, so that developers are fully aware of what is required and planning applications can be decided promptly.
- 1.17 The Strategy recognises the substantial and increasing pressures on local authority resources and suggests that there is a considerable role the voluntary and community sectors could play in undertaking some of this work, such as conservation area reviews and the identification of heritage assets of local interest.

2. CONSULTATION

- 2.1 The Strategy has been shaped by considerable informal consultation from the outset. There have been two workshops and the consultants have discussed issues on a one-to-one basis in person or by phone. The consultation and the feedback is set out in the section 8 of the Strategy.
- 2.2 As some of the recommendations seek a working relationship with these groups and individuals, it is important that a final consultation is undertaken and the views sought. Following consultation the Strategy will be taken

back to Cabinet with the comments received and any recommended amendments for final consideration.

3. OPTIONS

- 3.1 The options to be considered are:
- i. Not to publish the document for consultation nor adopt it;
 - ii. Not to publish the document for consultation and adopt it;
 - iii. To publish the document for consultation as presented to Cabinet; or
 - iv. To publish the document for consultation with any necessary amendments recommended by Cabinet.
- 3.2 The first option could leave the District Council's emerging Local Plans vulnerable at Examination in Public. There are heritage-related policies in the Plans and the Heritage Strategy provides evidence to support these policies.
- 3.3 The second option would enable the District Council to adopt the Strategy as an evidence document, but this could result in a Strategy that could not be implemented. This is because some of the actions would require working with others, such as businesses, landowners, Parish Councils and amenity groups, and these stakeholders would not have an opportunity to shape the strategy. In addition the informal consultation, whilst extensive, has been focused on specific groups, and the general public, businesses, landowners and developers also need to be consulted to ensure that the strategy is practical, realistic and deliverable.
- 3.4 The third option is recommended, which will ensure that there is an opportunity for local groups, businesses, landowners and other stakeholders to have a final input into the Strategy, ensuring that it is practical, realistic and deliverable. It will also ensure that greater weight can be given to it when the local plans are considered at Examination and as a consideration in relevant planning decisions.
- 3.5 The fourth option has the same outcomes as the third option and allows Cabinet to make any necessary amendments to the text before consultation.

4. RISK MANAGEMENT ISSUES

- 4.1 Risks are as presented below.

Perceived risk	Seriousness	Likelihood	Preventative action
The Heritage Strategy becomes too onerous and is not used	High	Medium	The Strategy has had been subject to initial work with stakeholders to ensure that objectives and priorities are realistic and can be implemented. A

			period of consultation is recommended to ensure that further comments can shape the final strategy.
The Heritage Strategy is subject to significant challenge at examination and/or planning appeals	High	Low	The strategy has been prepared following policies set out in the National Planning Policy Framework and Planning Practice Guidance. Consultation on the draft strategy will allow further changes to be made to ensure it is robust.
Significant changes in legislation and Government planning policies and guidance	Low	Low	The National Planning Policy Framework has recently been updated (July 2018). The new version maintains the support for positive heritage strategies

7. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

7.1 Legal Officer's Comments (DK)

There are no legal implications arising directly out of this report. The Council must comply with the National Planning Policy Framework (published by the Ministry of Housing, Communities and Local Government in July 2018) when preparing and implementing its Heritage Strategy.

7.2 Finance Officer's Comments (CS)

There are no direct financial implications of this paper.

7.3 Diversities and Equalities Implications (GE)

There are no direct implications arising from this report. However, as part of good practice, an Equality Impact Assessment should be carried out to fully ensure there are no adverse impacts of the strategy on protected characteristics

8. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officer prior to the meeting

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The following background documents have been relied upon in the preparation of this report:

(Note: only documents that have not been published are to be listed here)

Appendices:

Appendix 1: Folkestone & Hythe District Heritage Strategy.