



Historic England

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Our ref: PL00510205

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Dear ██████████

Southend Local Plan Issues and Options Consultation March 2019

Thank you for your notification of Issues and Options consultation for your Local Plan. 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. We do not have the capacity to review the consultation document in detail. However, we provide the following general advice which may be useful to you as you prepare your Local Plan.

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your local plan development:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

Managing Significance in Decision-Taking in the Historic Environment - Good Practice Advice in Planning 2
<https://content.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2.pdf/>

The Setting of Heritage Assets - Good Practice Advice in Planning 3
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>



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Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





Conservation Area Appraisal, Designation and Management - Advice Note 1
<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

Making Changes to Heritage Assets - Advice Note 2
<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Tall buildings – Advice Note 4
<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

Local Heritage Listing - Advice Note 7
<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

Sustainability Appraisal and Strategic Environmental Assessment – Advice Note 8
<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:

<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

Specific Advice on Common Themes

Some common themes are clear from the advice we give in the East of England. A summary of some relevant topics follow:

Terminology

The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.





Please note that the official name of Historic England is the Historic Buildings and Monuments Commission for England. It was first established in 1984 and until 1 April 2015 was commonly known as English Heritage. At that point its common name changed to Historic England and a new charity, officially called the English Heritage Trust, took the name of English Heritage. English Heritage looks after the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. It is therefore Historic England that is the statutory consultee, rather than English Heritage.

Sustainability Appraisal Scoping

The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8.

Key Plans and Programmes

When considering key plans and programmes, we recommend the inclusion and consideration of the following:

International/European

- UNESCO World Heritage Convention
- European Landscape Convention
- The Convention for the Protection of the Architectural Heritage of Europe
- The European Convention on the Protection of Archaeological Heritage

National

- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979
- Marine and Coastal Areas Access Act 2009
- Government's statement on the Historic Environment
- National Planning Policy Framework
- National Planning Policy Guidance

Local

- Local Plans
- Historic Environment Record
- AONB Management Plans
- Heritage/Conservation Strategies
- Other Strategies (e.g. cultural or tourism)
- Conservation Area Character Appraisals and Management Plans
- Listed building Heritage Partnership Agreements

Baseline Information

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.





We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the City, Borough or District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.

Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

Key Sustainability Issues

We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.





Conclusion

We would encourage local authorities to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal. Our advice note provides more guidance to developing a robust sustainability appraisal framework.

Evidence base

Any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base. Sources include:

- National Heritage List for England. www.historicengland.org.uk/the-list/
- Heritage Gateway. www.heritagegateway.org.uk
- Historic Environment Record.
- National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk
- Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)
- Conservation area appraisals and management plans
- Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/
- Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0
- Detailed historic characterization work assessing impact of specific proposals.
- Heritage Impact Assessments looking into significance and setting.
- Green Belt studies.
- Visual impact assessments.
- Archaeological assessments.
- Topic papers.

Green Belt

One of the five purposes of the Green Belt is to preserve the setting and special character of historic towns. Historic towns and former towns are situated across the region and should form a consideration in any review of Green Belt.

Without an appreciation of the history of the region's historic settlements and their close relationship to their surrounding landscapes, it is not possible to properly ascribe a value to the openness of the Green Belt land around them. Consideration of the value of the Green Belt requires understanding the historic significance of this open landscape.

Whilst Green Belt reviews often divide the area into parcels of land to make the assessment exercise manageable, parcels should not be solely reviewed individually within their immediate context. It also is important to understand how collectively they achieve the strategic aims of the Green Belt.





Green Infrastructure

Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

Site Allocations

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

We often find that while some of the sites in the Plan identify heritage assets as potential constraints, this is not consistently done for all sites and all heritage assets. There also can be limited information in documents on how sites might be developed, making it difficult for Historic England, and others, to assess their full impact. We are keen that allocated sites include development criteria to guide future proposals, including references to the historic environment where needed (this follows the national Planning Practice Guidance). There is a danger to both heritage assets and potential developers of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be understood and justified.

It should be noted that there are areas of archaeological interest beyond scheduled monuments and historic landscape issues beyond registered historic parks & gardens. Wider archaeological and landscape/townscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.





All sites should be scoped for archaeological potential before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER. Archaeological assessment and evaluation should be in line with the NPPF and best practice guidance so that impacts can be assessed at the earliest opportunity.

Assessing sites

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.
- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).





Assessment criteria

Many authorities include a distance based criteria to assess impact on the historic environment. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.

Heritage Impact Assessments

In order to help refine which growth allocations to take forward, we would suggest that a Heritage Impact Assessment is undertaken of each of these sites. We would refer you to our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans.

All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.





A positive strategy for the historic environment

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

Strategic policies

Strategic policies are a very important part of the plan, particularly given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 156 of the NPPF makes it clear that, 'Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape.' Therefore we would strongly advise the inclusion of a strategic policy that addresses these matters.

Site specific policies

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential





where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

Site specific heritage policies may give guidance on development within or adjacent to heritage assets that demonstrate the local area's special and distinctive character. You may wish to provide such policies for the following areas of the historic environment, along with any others that are appropriate or brought forward via the consultation process;

In all cases, it should be emphasised in local policies and supporting text, that the setting of heritage assets should be considered holistically as part of the historic environment and that a consideration of setting should form part of any assessment of significance.

Where any site allocation includes heritage assets or could affect their setting, this should be identified as a consideration of material weight in the consideration of subsequent development proposals equal or greater than presumption in favour of development through the site allocation process.

Setting

We expect to see appropriate references to setting in policies. As with assessing the impact of site allocations on setting, with a site specific allocation, it is important to understand the significance of any heritage asset/s, and their setting/s, that would be affected by the site allocation in order for the policy to reflect these considerations. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. We would expect to see this reflected in the policy wording and supporting text.

Archaeology

We welcome specific provision for the protection and enhancement of archaeology as well as emphasis that sites of archaeological importance can occur everywhere. We encourage clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record (eg: Historic Environment Records) for archaeological remains that are not to be retained in situ.





Where suggested sites are located in areas of known archaeological potential, weight should be given to this as a consideration in site selection and the comparison with alternate locations. We encourage close liaison with the County Archaeologist at site allocation stage.

Listed Buildings

Listed buildings include a variety of structures reflecting the areas architectural, industrial and cultural heritage. We will look for policies that carefully consider the preservation and preferably enhancement of these assets and crucially, of their setting.

In some instances, a full consideration of setting may require close co-operation with adjoining districts where landscape setting may fall within the boundary of these neighbouring authorities. Where relevant, we will seek evidence of this cross-boundary co-operation in the evidence base.

We also encourage a policy that addresses the potential listing over the plan period of as yet unidentified heritage assets that further demonstrate the development and activity of the town and its inhabitants.

Conservation Areas

Each local authority contains a number of designated Conservation Areas. We encourage that the local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area's local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special and distinctive character of Conservation Areas, emphasising that this is a cumulative result of built form, materials, spaces and street patterns, uses and relationships to surrounding features such as the surviving historic buildings and street patterns.

We would also welcome provision for any future designation of conservation areas within cities, districts and boroughs as well as specific provision for the landscape setting of different parts of the area.

Registered Parks and Gardens

It may be appropriate to specifically identify Registered Parks and Gardens as protected by any such policy. The policy should anticipate and protect any future designations.





Heritage at Risk

We recommend the inclusion of a policy basis to address Heritage at Risk. We also recommend the creation and management of a local Heritage at Risk register for Grade II listed buildings. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified. The National Heritage at Risk Register can be found and searched here by local authority:
www.historicengland.org.uk/advice/heritage-at-risk

Non-designated heritage assets

Historic England has published guidance pertaining to Local Listing which you may find helpful: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

In national policy terms, 'non-designated heritage assets' (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions. Paragraph 135 of the National Planning Policy Framework states that decisions on applications affecting such assets will require a balanced judgment that has regard to the significance of the asset and any harm or loss:
<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/12-conserving-and-enhancing-the-historic-environment/>

Government guidance recognises that local lists and local criteria for identifying non-designated heritage assets are a positive thing and can help with decision-making:
<http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/what-are-non-designated-heritage-assets-and-how-important-are-they/>

We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:
http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_buildings.aspx

There are enough appeal cases to indicate that inspectors regard non-designated heritage assets, and something on a local list, as an important material consideration in planning decisions. In fact, where there isn't a local list, some inspectors have been unable to give as much weight to a non-designated heritage asset. Our website contains a number of appeal cases and if you search for 'locally listed heritage asset' or 'non-designated heritage asset', you will get relevant ones:
<http://www.historicengland.org.uk/advice/hpg/planning-cases/>

Robust provision for these heritage assets will increase the soundness of your forthcoming plan.





Design

We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. Most particularly, we seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design. We would also welcome this in relation to tall buildings policy that may come forward as part of the plan.

Landscape and Streetscape

Landscape

Landscape character assessments, particularly those accommodating major developments, can be deficient in assessing the landscape value relating to scheduled monuments and their settings. The historic environment has an important role to play in understanding the landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.

Streetscape

Consideration of streetscape, particularly given the issues of connectivity and traffic management is an area for exploration. For streetscape improvements we would refer you to the Streets for All publications <https://historicengland.org.uk/images-books/publications/streets-for-all/>. These documents provide updated practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations. It sets out means to improve public spaces without harming their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements.

The advice draws on the experience of Historic England's planning teams in the development of highways and public realm schemes. Case studies show where highways works and other public realm schemes have successfully integrated with and enhanced areas of historic or architectural sensitivity.

Please also see our advice for highways engineers and designers:

<https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/>.





Climate Change and Renewable Energy

We invite a specific policy relating to the inclusion of renewable technologies within Conservation Areas and with regard to historic buildings and the wider historic landscape. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf> to be helpful in understanding these special considerations.

Historic Shopfronts

The retention of original/historic or significant shopfronts elements are often integral to the character of these buildings and that of the wider street scene. The Local Plan should highlight the importance of retaining or restoring historic shopfront features. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shopowners. A good example of how historic shopfronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a National success. The council have also seen a ripple effect of surrounding properties being restored.

Enabling Development

By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy.





Monitoring

We recommend indicators to measure how successful historic environment policies are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.

Glossary

Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include:

Listed Buildings
Scheduled Monuments
Conservation Areas
Registered Parks and Gardens
Registered Battlefields
Protected Wrecks
Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

Mapping

We recommend that designated heritage assets are marked on maps, where appropriate.

Statement of Community Involvement

References should be made to the Historic Buildings and Monuments Commission (“Historic England”), not English Heritage.

Concluding thoughts

In preparation of the forthcoming Southend Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.





Finally, 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.

With kind regards



Historic Environment Planning Adviser, Planning Group

