Historic England

YORKSHIRE

Mr. Stephen Walker,
Principal Conservation Officer,
Hull Guildhall,
Economic Development and Regeneration,
Hull City Council,
The Guildhall,
Hull
HU1 2AA

Our ref: PL00798293

Your ref:

Telephone 01904 601 879
Mobile 07502 737925

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Dear Mr. Walker,

Wincolmlee New Conservation Area Consultation

Thank you for consulting Historic England in connection with above proposed conservation areas. Historic England is a public organisation that protects and brings new life to the heritage that matters to us all, so it lives on and is loved for longer. In this context, we are pleased to offer our comments.

We welcome that you have carried out work to meet your ongoing duty in section 69 of the Planning (Listed Buildings & Conservation Areas) Act 1990, to review from time to time which parts of your area should be designated as conservation areas.

We have considered the consultation in the light of the National Planning Policy Framework (NPPF, 2024). Paragraph 202 says heritage assets should be conserved in a manner appropriate to their significance. Paragraph 204 says, when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. This message is reinforced in the Planning Practice Guidance (paragraph 024 Ref: 18a-024-20190723).

We publish advice on *Conservation Area Appraisal, Designation & Management* in Historic England Advice Note 1 (2019, 2nd ed). This says (including in paragraph 14) that new conservation areas can be identified in various ways, including standalone studies, evidence gathering for plan-making or decision-taking, master-planning work, local listing, or other

new research or awareness raising. It says (in paras 72, 73, 76 and 92) that conservation areas might cover a variety of types of special interest, including where there is a cluster of other designated and non-designated heritage assets, areas linked to particular industries or local traditions, and areas with a historically significant layout visible in the modern scene. Most areas will have both architectural and historic interest, though one may be more important than the other (para 34). It is appropriate to consider later phases of development not previously considered sufficiently historic (para 106). Paras 27 and 35 also provide detailed advice on how to identify special interest.

With this policy, guidance and advice in mind, we support in principle the intent to identify a conservation area at Wincomlee. When considering designation, para 11 of our advice note says you should appraise: (a) whether the area has sufficient architectural or historic interest to be considered special; (b) whether this is experienced through its character or appearance; (c) whether it is desirable for this to be preserved or enhanced, and what problems designation could help to solve. Paragraph 16 says it is good practice to prepare a designation assessment to that effect, and we suggest this should be done to inform consultation. It need only be brief and proportionate ahead of preparation of a full appraisal should the decision then be made to designate. This ensures the area's designation is robust. In doing this, we suggest considering whether other adjoining parts of townscape might also have sufficient special interest to be included, for example at Glass House Row and Eagle Terrace on the east bank of the river, which could be considered for inclusion in the same way as the dry dock and some associated buildings on Lime Street.
Whilst it is entirely appropriate to designate a conservation area that needs enhancement, if the nature of the area means enhancement becomes the primary task (over preservation) then in order to help meet your duty in section 72 of the Act, it would be advisable to publish management proposals needed to secure enhancement at the same time as the decision to designate. This would demonstrate that it is desirable as well as indicating how it would be delivered in the long term.

Please get in touch if you require any clarification. We look forward to hearing about next steps.

Yours sincerely,

John Lambe

John Lambe
Historic Places Adviser
E-mail: john.lambe@HistoricEngland.org.uk