



ENGLISH HERITAGE



Dr Susan Priest  
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Our ref:  
Your ref:

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23<sup>rd</sup> Sept 2014

Dear *Susan,*

**re: Proposed leisure centre and related development at Princes Parade.**

I am able to write to follow up our site inspection on 27<sup>th</sup> August sooner than I had expected for reasons I shall explain. We found that day very helpful not least to better understand the issues and your Council's position and aspirations. It also gave us the valuable views of a subset of members of our advisory committee i.e. an indication of how the committee itself might view the case. We have however taken the decision to postpone seeking the formal advice of our committee. We did so as we think we need further information from your Council but also so as to recognise that we are at the start of what could be a very long process and therefore not to see English Heritage take a position prematurely, which could prove ultimately unhelpful.

As we understand the current situation we are not being asked about the impact of a specific scheme but rather on the acceptability of any substantial development on the site. In the first instance this requires engagement with the proposed new Local Plan and its site-specific content for Princes Parade. We understand that public consultation on the latter may start in November and we think it will be helpful for us to see your proposed text and its justification before we can give our advice. We can wait a few more months but if you are close to having a draft policy for the site we would be pleased to see and comment on this now, including, if you are happy for us to do so, in confidence before public consultation starts. Alternatively we would be happy to discuss with you how a policy for the site might best be framed so as to meet the sustainability goals of the NPPF.

We found the draft Heritage Impact Assessment by Lee Evans Partnership to be helpful but we are not in full agreement with its approach. It concentrates on the extent to which views of and from the monument that existed when the Royal Military Canal (RMC) was first built have now been compromised and it promotes location option 3, placing heavy reliance on the masking effect of the raised land of the former refuse dump. We do not fully agree with such an approach because, whilst



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views are important, they are not the only way in which the monument can be experienced. Nor does the harm to be caused turn on the comparison of views at the time of construction with those of today. It is the experience of the monument now and in the future that is the issue and there is value in the ability to move around the eastern end of the canal so as to explore the relationships between it, the open land to its south, the sea and the defended higher land. It is this that permits the purpose of the RMC as a barrier to invasion to be appreciated and we think that loss of a significant proportion of the open land between the RMC and the sea to the combined development of a leisure centre and school (and perhaps housing) must diminish this experience.

We also place weight on how the monument is experienced in longer views. To varying degrees (with option 3 being the greatest) new buildings would be prominent in vistas along and into the site from the coast road – vistas that the Planning Inspectorate placed great weight on. We also attach considerable value to views over the canal from the high land of the escarpment in which the broad sweep of the bay is clearly seen. In such views substantial buildings at options 2 and 3 could be particularly prominent, including from such places as Hospital Hill or within the Shorncliffe military cemetery. Option 1 is less visible from much of the high land but the site narrows as the canal meets the sea and major buildings here could thus be more visible from within the canal itself. Existing development has however encroached heavily on the terminal of the canal and has made it difficult to now appreciate how the historic arrangements for its defence were intended to work. This existing harm is not a reason to permit more harm but the cumulative effect of some limited further new development here might be less harmful than introducing large buildings into undeveloped areas.

Since policy TM8 was written factors have changed and these should be reflected in any replacement draft policy. Despite investment using Lottery funds, the condition of the RMC and its associated open land is not good and is capable of significant enhancement so as to deliver the kind of quality public open space that the existing policy promoted. NPPF also now provides the planning policy framework for the future of the site. We can continue to explore whether the impacts of the level of development your Council aspires to must amount to “substantial harm”, and for this the major changes post construction are relevant, but whether it is NPPF 133 or 134 that most applies all harm to designated heritage assets, including by change within their settings, requires clear and convincing justification. The issue of the necessity of causing harm must be addressed and here the availability of alternative options for development, including some with extant planning permission, must carry weight even if your Council believe them to be less good than a Princes Parade solution.

NPPF 137 looks to local planning authorities to explore opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that achieve this should be treated favourably and this shift in emphasis for enhancement and not just preservation of heritage assets needs to be reflected in any future Local Plan policy for the site. We think that any of the three options presented to us for a new leisure centre and school would cause some harm to the RMC through change in the openness of its setting. It is the severity of the harm that varies between the site options and which might be minimised not just by location but also by the quantum of new building and their design (for example their massing, materials, colour, landscaping etc).



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NPPF 134 states that harm might be justified if it helps to secure the optimum viable use of an asset. In this case we judge this to be as public open space with low key leisure uses that help people to understand and enjoy the site. We accept that an appropriate type and level of new development might be one but not the only means to secure enhancement of the RMC and its environs. We have no issue with existing uses such as canoeing or angling but believe these must be managed to prevent harm. We have been willing to consider a small-scale facility for canoeists at the eastern end of the canal and we would be content to explore further, without prejudice, what level of development might be possible using a potentially larger proportion of this part of the site.

To conclude, we think that for any new Local Plan policy to be acceptable it must reflect all of the NPPF advice, including specifically that in section 12 for conserving and enhancing the historic environment. If the wording of the existing policy is to be altered then the promotion of enhancement of heritage assets not just their preservation provides a means to explore whether more future change than perhaps policy TM8 envisaged could be justified. The bar for the acceptability of sizeable development at the Princes Parade site should, however, continue to be set high and on this basis we are very doubtful that we could support the scale of development now being promoted. We are willing to discuss how to frame a replacement for policy TM8 but we do think the essential aims and guidance of this policy should be taken forward. If not, we must reserve our position for making a possible representation to any future Local Plan hearing.

We will be happy to engage constructively with you to explore what types of development in which locations might be possible at Princes Parade. If, for example following examination in public and notwithstanding anything English Heritage might then say, a new policy were to be adopted that provided scope for the scale of change that is now proposed, we would still wish to engage in the design process for this to minimise harm to and to maximise enhancement of the RMC and its setting.

As discussed on site, I think we should now deepen our dialogue about the Princes Parade site and that a starting point for this could be about the Local Plan policy. I look forward to hearing from you.

Yours sincerely



Peter Kendall

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