



LTR/08113/1/NALE

05 August 2014

David Shore
Shepway District Council
Planning and Building Control Services
Civic Centre
Castle Hill Avenue
Folkestone
Kent CT20 2QY

Dear Dave

PRINCES PARADE & THE ROYAL MILITARY CANAL

Thank you for coming to see us last Friday and I would like to confirm that we are interested in providing Accredited Conservation Architectural and Planning advice in relation to your council's proposals for a new leisure centre and the school redevelopment on land to the seaward side of the Royal Military Canal (RMC) at Princes Parade, Seabrook.

We understand you are looking for the preparation of a Heritage Statement which can be used to assist in developing your proposals for the site, and be used to further a constructive discussion with English Heritage at your meeting with them on the 27th August 2014.

The new British standard 7913: 2013: A Guide to the Conservation of Historic Buildings; and English Heritage's recent draft guidance to accompany the NPPF: "Historic Environment Good Practice Advice on Planning" (July 2014) both set out the need, where development is proposed near to Heritage Assets (such as RMC), for a thorough assessment and appraisal of the significance of the Heritage Asset and an assessment of the impacts of any proposals on the setting, and value, of the Scheduled Ancient Monument.

We would, therefore, propose the preparation of a Heritage Assessment of your preliminary proposals. This document would demonstrate that you have considered the impacts of proposals on the RMC and its setting and I attach a fee proposal, for this work, for your consideration

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It would appear, from English Heritage's letter of the 2nd July 2014, that they assume that your proposals would cause **substantial harm** to the setting of the Scheduled Monument. I believe that there is a counter argument which demonstrates that the setting has already been compromised by the raising of the ground at the eastern end of the site and as a consequence of 20th Century development which obscures the historic 'firing lines'. We would test this assumption by carrying out a photographic study of the immediate area to establish how any views of the site would be changed by the proposals. We also will need to research the history of the canal at Seabrook to assess how much of its historical and cultural significance has already been affected by the surrounding development.

We would also look at ways in which the impact of the proposals could be mitigated. This may include limiting the height of the built form where it can be seen from the canal paths, careful siting of the buildings and possibly landscaping measures. English Heritage acknowledges that the RMC is in an unsatisfactory condition at Seabrook and could be greatly enhanced for the conservation and enjoyment of residents and the public generally. There may be a way of linking your leisure proposals with the canal and enhancing its preservation and interpretation, which could be seen as a benefit to the Scheduled Monument's conservation and enjoyment by the public.

Peter Kendall of English Heritage also points out that "*as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. The onus therefore is on local planning authorities to rigorously test the necessity of any harmful works*". Your current proposals have three components; the sports centre, the school and housing units and you need to justify the location of all this development at the site in Seabrook.

I would be very surprised if the Council can satisfactorily prove the necessity for the proposed housing on the site, since there are other housing sites in the immediate area which could be used to meet local need. I also understand the Council have tried, in the past, to have the site allocated for housing and previous Planning Inspectors have rejected this proposal. I, therefore, recommend that you omit the housing development from your proposals.

The justification for the new school would probably need to come from KCC, but I assume no other sites are available of sufficient size with enough flat ground and around them for playing fields and play areas.

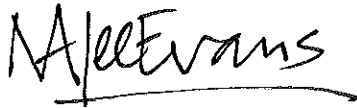
You sent me through the Review of Leisure Centre Development Options Appendix 1 which argues, very well, the case for a larger sports facility incorporating a six lane pool, learner pool, sports hall, gym and studio. However, the document only cursory analyses where this facility could be located in the District and, in my opinion, would not provide sufficient justification for the use of the Seabrook site adjacent to a Scheduled Ancient Monument over and above other sites in the locality such as The Green in Hythe.

I don't know if you have sufficient resources in your department before 27 August to carry out a more rigorous review of alternative sites for the leisure centre, but I would recommend that you do this, if at all possible. We could possibly help you with this analysis but we have limited resources throughout the holiday period. If this work cannot be carried out by the meeting I think we should explain at the start of the meeting that the Council are re-examining their options for the siting of the sports centre and pool, to ensure that the site is the only satisfactory option available. We can then make the findings available as soon as possible afterwards.

Notwithstanding the difficulties of building close to a Scheduled Ancient Monument, the NPPG gives guidance that early understanding of the significance of the Heritage Asset, and its setting, may be possible with a sensitive design solution which would deliver 'public benefits' in a sustainable and appropriate way.

I would recommend a constructive approach to this first meeting with English Heritage, not one that is confrontational, with the aim of demonstrating that the Council is listening to their advice and seeking to minimise the impact of any proposals on the Scheduled Ancient Monument. However, the Council will also need to explain the significant public benefits of their proposals forcefully.

Yours sincerely

A handwritten signature in black ink that reads "N. Lee Evans". The signature is written in a cursive style with a horizontal line underneath the name.

Nicholas A Lee Evans
Lee Evans Partnership LLP

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