

Comment Receipt

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Your Comments

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With less than a day left of the Consultation period, the Lee Evans Partnership's Heritage Impact Assessment report (dated Aug 2014) has belatedly been released under a FOI request. This is an excellent report which draws attention to a number of heritage factors which cannot be ignored while however omitting to consider a number of key (non-heritage) matters, of which the company appears, reasonably, to be unaware, but which impact upon their conclusions.

I therefore feel it necessary, briefly, to add the following points of clarification to ensure the Lee Evans report is placed in the correct context.

- 1 The report (paras 2.8 – 2.10) correctly states "*there would not appear to be any justifiable need for housing in this location*" and "*given the close proximity of the site to the Scheduled Ancient Monument, and the potential for 'substantial harm' to the designated Heritage Asset, it is recommended that the proposed housing is deleted from the development scheme*".
- 2 In respect of visual impact as seen from the canal, the report correctly states (para 7.10) "*The introduction of two large buildings [i.e. the leisure centre & school] to the south of the Canal will, in my [Lee Evans] opinion, seriously and significantly harm the setting of the RMC as a Scheduled Ancient Monument.*"
- 3 Similarly were the buildings to be placed at a mid-point along the PP site, the report states (para 7.12) "*the new facilities would be visible from the north bank path where there are gaps in the vegetation.*" ... "*The impact upon the Canal's setting would, it is considered [by Lee Evans], still be substantial.*"
- 4 The report proceeds to suggest (paras 7.13 – 7.17) that the most westerly end of the site "*would have the least impact upon the setting of the Scheduled Monument. I [Lee Evans] would also*

contend, given that the setting has already been compromised by the filling and raising of the land in the 1970's, that it should be possible, with careful design, to develop Site 3 to provide the sports and school facilities required by KCC and the District Council without providing 'substantial harm' to the setting of the RMC."

- 5 While rejecting the eastern & mid site options on the grounds of "*substantial harm to the setting of the RMC*", Lee Evans states (para 8.26) that "*the development of Site Option 3 [i.e. the most westerly end of the site] will, in my opinion, have the capacity to provide for less than substantial harm. My reasoning for this is two-fold. Firstly, the option 3 site is wider at this point, providing the ability to set the building back from the canal edge. In doing so, the development has the potential to remain unseen from the southern tow path along the Canal. Secondly, a wider developable area will provide for the potential to reduce the scale and bulk of the built development, particularly the leisure facility, thereby reducing the overall visual impact...."*
- 6 In addressing the Public Benefits, Lee Evans has drawn upon some (but not all) of the reports in the possession of Shepway DC, erroneously claiming that (para 8.35) "*For numerous reasons it has been established that these [referring to SDC's assessments for Nickolls Quarry, South Rd and Eversley Rd] are not viable, appropriate or developable sites*". In other words Lee Evans is clearly unaware of the viability and significant advantages of those alternative sites, some of which have already been stated in my earlier comments (ID 877690) and by others. (I note too that the author has failed to pick up key points from Strategic Leisure's earlier report, Aug 2012).
- 7 No consideration has been given to the Sport England position in respect of providing a leisure facility for residents to the west of Hythe, Romney Marsh, and NQ, nor to the fact that the residents of Folkestone are already catered for with existing facilities.
- 8 Para 2.7 misunderstands the status of, and SDC's proposals for, the Eversley Rd site – for example, it is not a public playing field and it is incorrect to claim it will remain as such if the Princes Parade project proceeds. This is erroneously stated as a reason why PP is considered to be a more acceptable location for the school.
- 9 There are other serious implications that need to be considered in respect of the Lee Evans' suggestion that development at the western end of the site might be possible:
 - 1 This would be a totally unacceptable position for the placement of buildings – even worse than at the eastern end. Being in the centre of a 2 km stretch of green open space, it would have a dramatic adverse impact on Princes Parade as a unique visual amenity of such importance to Hythe. Were the centre of the Princes Parade vista to be ruined, by following this suggestion, the ability to deny any proposed development on the golf course would be severely weakened.
 - 2 It is not a practical proposition to reduce the height of the leisure centre building, as suggested, while providing the desired facilities based upon the ARC model. Any undesirable deviation from the ARC model footprint would incur additional costs without benefitting the users.
 - 3 The (already under-estimated) costs would be significantly increased due to the longer utility supply runs (which would come for free on NQ).
 - 4 Were the school to be placed at the western end of the site then it will be located even further from the Seabrook School's catchment area and be even less accessible. Ignoring the serious downsides of building on a contaminated rubbish tip on an exposed coastal site, and in the unlikely event that such a more distant location were that to be given serious consideration, then one could raise the question as to why not consider building the school on the more accessible Foxwood site already owned by KCC?
 - 5 Lee Evans suggests that (para 8.39) "*that the proposed development, in principle, has the ability to 'un-do' some of the historic harm to the RMC's setting. A reduction in levels of an area, or areas, throughout the site and the insertion of pedestrian 'swales' or vista points would significantly enhance the interpretation of the Canal and the remains of the former Battery buildings etc*". Such an approach to the 'un-doing of harm' does not necessitate any such development and, in the process, ruining Princes Parade, as would be the case if Option 1 were adopted. Indeed such an 'un-doing' is achievable more readily and more effectively by following Policy C9 Option 3, and I support this.

- 6 The suggestion that the levels could be reduced in order to 'undo previous harm' makes no sense since it would require the removal of upper layers of soil and contaminated waste. The one thing that must not be done, unless willing to cope with the potentially very expensive risk consequences, is to disturb or remove the contaminated waste which would be necessary to follow this suggestion. Also the flood risk would be increased, not helped by the suggestion to place the buildings at the south edge of the site to minimise visual impact from the RMC.

The Lee Evans report attempts to come up with a helpful solution that might make a development on Princes Parade acceptable on heritage grounds, offering the most westerly end as a possibility, subject to further investigation and provisos. I believe my reasons stated above, which cover the points that Lee Evans was unable to consider, make it clear that the western end solution is however also a non-runner. Their report therefore supports the views I have made previously (both for this Consultation and in my 3rd Sept 2014 detailed report "Hythe Swimming Pool & Related Developments"), that there should be no development on Princes Parade.