

Comments for English Heritage Shepway Places and Policies Local Plan Issues and Options Consultation Policy C9

C9 English Heritage has significant reservations about the first option for a swimming pool, new school and possibly some enabling new housing at the Princes Parade site. We think alternative sites are available for both the pool and the school (the second option) and that as these do not cause harm to the historic environment they should be adopted. The third option is effectively the status quo situation after the last Local Plan inspector ruled against major development at Princes Parade.

TM8 is the saved 2006 Local Plan site specific policy and we can support its continued application with perhaps minor amendment. It refers to minor and low key development at the site and we think this is possible without unacceptable harm.

The policy should be framed in terms of NPPF advice, and specifically with reference to section 12 in respect of policies and proposals that relate to heritage assets and their settings. Under paragraph 129 the planning authority must assess the significance of the heritage asset affected by proposed development, including the contribution made by its setting. Paragraph 132 says that significance can be harmed by development within setting and that substantial harm should be wholly exceptional. Under paragraph 133 substantial harm must be demonstrated to be necessary at this site, and the existence of alternative sites for the pool and school would make this difficult to prove here.

The undeveloped open land between the Royal Military Canal and the sea forms the setting to the scheduled monument and although this has seen some change it still makes a major contribution to understanding of the significance of the RMC as a fortification and to the experience of this monument. We are not convinced that the amount and type of proposed new development can be accommodated at the site without causing a high (and therefore probably unacceptable) level of harm to the significance of the RMC, and that this might be substantial within the meaning of the NPPF. Part iv of the option for major development at Princes Parade includes the requirement so that *development preserving and where possible enhancing the setting of the Royal Military Canal and other heritage assets*; achieving this requirement is probably incompatible with the kind of development that would be necessary in option A. A limited amount of development might be possible at this location, i.e. a scheme more in keeping with the level of development envisaged by saved policy TM8 and by the inspector at the public inquiry.

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