



Historic England

Planning Policy
Folkestone & Hythe District Council
Civic Centre, Castle Hill Avenue,
Folkestone
Kent CT20 2QY

[By email only to planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk)

Our ref: [REDACTED]
Your ref:
Telephone [REDACTED]
Fax [REDACTED]
Email [REDACTED]
Date 11 March 2019

Dear Sir or Madam

Folkestone and Hythe Core Strategy Review Regulation 19 Consultation

Thank you for your email of 25 January 2019 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

Historic England has the following detailed comments to make on the draft Core Strategy Review. The order of comments follows that of the draft Plan and is confined to matters relating to the historic environment and heritage assets within our purview.

As far as it is relevant, this letter should be read alongside our letter of 16 March 2018 regarding the draft Places and Policies Local Plan Regulation 19 consultation, particularly with regard to the views expressed in that letter in relation Princes Parade at Hythe. At this stage it is the new proposals for development of the Otterpool Park Garden Town which, which has in part necessitated this review, which is the focus for our comments. You will note also that there has been a good deal of discussion and exchanges of correspondence on this matter between the Council and Historic England since the proposals first emerged and the comments below are cast in the context of those ongoing conversations.

While Historic England is broadly supportive of the **Aims and Vision for Folkestone and Hythe**, we have a particular interest in those relating to **Strategic Need B: The challenge to enhance management and maintenance of natural and historic assets**, notably bullet 8 relating to protection of the district's historic environment and heritage assets.

Historic England does not have too much difficulty with supporting the principles for **Future Vision for Folkestone and Hythe District** as expressed in the grey panel under paragraph 3.8 but finds this hard to reconcile with the text in paragraph 3.15, second sentence, which remains an area of contention for us. We strongly object to the proposals to develop a sport facilities and housing adjacent to the Royal Military Canal in Hythe, which this section

promotes, on the grounds that it will seriously harm the significance and setting of the scheduled monument.

Historic England has no fundamental concerns about direction set by **SSP1 District Spatial Policy** subject to the rigorous application of policies to protect and enhance the historic environment set out elsewhere in the development plan. This is essential in attaining the goal of sustainable development required by the National Planning Policy Framework (2019), an overarching objective of which is to “contribute to protecting and enhancing our natural, built and historic environment...” (NPPF paragraph 8 (c)).

New Garden Settlement (paragraph 4.416 et seq.)

As mentioned above, there have been detailed discussions between Historic England and the Council and the promoters of the proposed Otterpool Park garden town and these are ongoing. Historic England is not opposed to the principle of development of a new settlement in this location but has highlighted the significant and extensive nationally and locally significant heritage resources in and around the site. We would need to be fully convinced that these heritage assets are protected, integrated with and enhanced where possible as part of the planning and development of the site. We will continue discussions with the council and the promoter on the basis of the material provided separately by them but with consideration of the comments below on the text of the draft Plan on the matter.

Charter for Otterpool Park - the green box is a quote from the promotion document but the reference to a garden town with “its very own heritage” needs to build on the existing history of the place and not be solely about creating a place which may in time be valued in its own right, as early 20th Century garden cities now are.

Figure 4.5 is indicative only but there is a key issue that requires changes to it. We have helped the project proposers to understand the historic extent of the deer park to Westenhanger castle and its historic route of approach from the south via a once tree-lined drive that began at the park pale on what is now the A20 road. As currently drawn the indicative plan shows strategic open space around the castle but the depiction of this is too small and shows mixed use neighbourhoods south of the castle including as a continuous area between it and the A20. It is in our view essential that the southern entrance to the castle is reinstated and that a sufficiently large uninterrupted area of undeveloped land is retained between the A20 and the castle, so that an appreciation of the size and character of the deer park is possible. We are at present in discussion with the heritage adviser and seeking a meeting with the master planners as to what this might mean in practice but it is a key request by us. If developed as per Fig 4.5 and policy SS6 new development would press in on all sides to the castle in an unacceptable way. Unless and until we can be satisfied on this point in our ongoing discussions we must raise an objection to the draft plan at this stage.

Fig 4.5 identifies Heritage Assets by grey triangles and those indicated are all listed buildings, but Designated Heritage Assets are not the full picture. The project has carried out extensive geophysical surveys backed by field evaluation through trenching. It has also considered unlisted buildings which may be candidates for listing but to date no screening or accelerated Listing requests have been made. There are archaeological remains that we would identify as being of equivalent significance to a scheduled monument and these should be identified as



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

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heritage assets on **Fig 4.5**. These include prehistoric barrows in groups some of which survive as very low mounds, i.e. are not wholly ploughed flat. This is unusual in Kent and such mounds are candidate scheduled monuments as they might be concentrations of prehistoric activity. Very recently a probable Roman villa has also been identified. These heritage assets are likely to have consequences for the eventual master plan and should, we suggest, be included in the Indicative Strategy that underpins this.

Policy SS6 NGS - The Development Requirements: we note the addition of text to the first sentence to read ‘The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area’ which we support.

We welcome the additional references in **Paragraph 4.177** to views and historic character’ and to heritage assets making a contribution to creation of a strong sense of place in revised **Paragraph 4.176**.

Policy SS7 NGS - Place Shaping Principles - We welcome **(1)b(iii)** and reference to a strategic open space that enhances the historic landscape setting of Westenhanger castle. Repair of the historic site and its successful, sustainable future would enhance the new settlement.

(5) Enhanced Heritage Assets - we can welcome the commitment to producing a Heritage Strategy as part of **Paragraph (a)**. We support the additional reference in **Paragraph (b)** to keeping the archaeological assessment under active review. Separating the requirement for public art as a part of **Paragraph (b)** is sensible.

Paragraph (d) is specific to Westenhanger castle and on the whole it is acceptable in its aspiration to make this in an enhanced setting and a focal point for the new settlement. We need to now explore what this means in terms of a masterplan, but the policy sounds right. We do however require more than exploration of the opportunity to recreate the southern historic approach; this has to be a requirement, in our view, as an enhancement of the site alongside the “generous public open space” covering a sufficiently large transect of the historic deer park on the south side of the castle.

We support the changes to the text of **Paragraph (e)** for other archaeological and heritage assets that now “will be evaluated, conserved and where appropriate enhanced”; to ‘conserve’ the heritage assets at Westenhanger castle in **sub-paragraph (i)**; and, to the conservation and enhancement of all relevant heritage assets including those which are outside of the land allocation boundary **sub-paragraph (ii)**.

NGS – Sustainability Principles (Paragraph 4.183 onwards) and Policy SS8 NGS - Sustainability and Healthy New Town Principles: the definition of sustainable development adopted here is mostly about ‘green’ issues; however, the environmental dimension of sustainability set out in the NPPF includes the historic environment (ref. NPPF paragraph 8 c)) and should be reflected here.



Policy SS9 NGS – Infrastructure, Delivery and Management: we welcome the inclusion of a requirement for the Community Trust or elected body responsible for the future management of the new settlement to make specific provision for a heritage facility such as museum/archive storage (new sub-paragraph 3 (viii)).

Historic England would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the draft Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

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Historic Environment Planning Adviser



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH

[REDACTED] HistoricEngland.org.uk

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