

EDITS:

Colour code: Out- red; Word change – green; Unchanged – black.

1. Roger Joyce -Proof of Evidence to Public Inquiry- 3 Oct 2021

ref NATTRANS/SE/S247/3254

My name is Roger Allen Joyce. I am a Chartered Architect, and a member of the RIBA since 1971.

I gained a post-graduate Diploma in Building Conservation from the AA (London) in 1990, and was included in the Register of Architects accredited for Conservation (the AABC), in 2004

I have served on Committees of ICOMOS (UK), as well as being a member of the DAC of both Rochester and Canterbury Diocese

I have been an Architect assessor for the Civic Trust Awards since 2008, and have been interested in the civic society movement throughout my professional career. In 2013, I founded the Shepway HEART forum, following Government creation of a joint Heritage and Tourism Ministry (the acronym acknowledges the Art scene here in Folkestone and Hythe District, and the forum provides a platform for groups and individuals involved in the fields of Heritage and Arts Tourism.

2. The District takes great pride in its military connections and history and I have a strong interest in the story of the defence of our coast especially during the Napoleonic era of the late 18<sup>th</sup> and early 19<sup>th</sup> centuries. We are fortunate to have a distinctive collection of heritage assets from this period centred around the outfall of the Royal Military Canal Seabrook. See FHDC Heritage Strategy (a)

3. In my Proof of Evidence, I intend to concentrate on the heritage aspects of the case and on the impact of the 'Stopping Up and diversion of the realigned road' (application S247) on the setting of the Canal, a Scheduled Ancient Monument.

4. It is important to understand the nature of the Monument, why it was built, and the way it was intended to function. As the *only* military canal of its kind in the country it is no exaggeration to describe it as 'unique'. It originates from a time when sea battles raged in

the channel and when, from Shorncliffe, the huge encampments of the French invasion force were clearly visible on the Boulogne hills just 20 miles away. With fears of imminent invasion at their height, work on the RMC, effectively a great defensive ditch, began at Seabrook on 30 October 1804

5. The Canal was built to defend the flat coastal area stretching from East Sussex to its outfall here at Seabrook. It is designed with a series of 'enfilade' kinks, each intended to be manned by a cannon. In addition, the militia, garrisoned at Shorncliffe, above the outfall, and at various Redoubts and Towers along the length of the Canal, would be mobilised and dispatched along the 'Military Road', on the south that should read north side of the canal, taking up their positions along the bank on the south side, that would act as their 'firing step'. If the enemy landed, the first defensive strategy would be to pick them off in the 'killing fields', that can best be appreciated at this particular site, as the relationship between Canal and water line is at its narrowest....

Until the site was filled with domestic and commercial waste the relationship between the levels would have been even more obvious.

6. It is equally important, in my opinion, (an opinion shared with many senior Conservation specialists), and in the opinion of others who have lodged objections, Princes Parade itself is an important piece of history, and merits being designated as a 'non-designated Heritage Asset', as defined in the NPPF (b) and the FHDC Local Plan. The Parade was opened by the then Prince of Wales in 1881 and provided a straight and spectacular link between Seabrook and Hythe. A tram operated on this road until 1922, and the original seafront Tram Shelter remains at Sea Road bridge to testify to this use.

7. From the point of view of the NEEDS test:

In my opinion, it cannot be denied that in order to implement the existing consent for the development of the site, the road needs to be moved. It needs to be moved so that the maximum value can be derived from the proposed housing, and so that the proposed 'traffic-free' esplanade can be created

8. From the point of view of the MERITS of stopping up the road, and providing an alternative alignment, in my opinion, there are few.

9. Firstly, by taking away the eponymous 'Princes Parade', its significance is lost. It will no longer be possible to understand its original intent, and the subsequent function as a Tram route (see also the depot and Tramway stables, in Red Lion Square) Together, they tell a story that is celebrated, in, among other places, the Sandgate Society HQ, where pictures of the tram in operation can be seen.

It would be wrong **the to** rename the proposed esplanade as Princes Parade, as it would not be that original carriageway, and the shelter would be lost somewhere in an unrelated and meaningless position somewhere among the proposed housing estate.

The NPPF **(b)** Paras 198 and 203, and footnote 68 deal with the treatment of non-designated heritage assets.

10. Secondly, but even more importantly, The Secretary of State for Transport ought, in my opinion to carefully consider the harm that the **consequence of the** proposed realignment of Princes Parade, and **the c.4,500 vehicular movements per day on to it** will do to the SAM, and to the setting of the Monument. As set out at some length in my opening comments, at present it is still possible to 'read' the Monument, and to appreciate its setting, and therefore its function, especially when viewed from high ground. This is where Sir John Moore and those who conceived this ingenious set of fortifications (such as Rennie) would have been able to see the whole complex, from the Redoubt at Shorn Cliff... (and I deliberately spell it like this as it was a 'Shorn Cliff' at the time)

The Military Canal can be appreciated from the north side, walking along the Military Road, with the backdrop of the glacis created from the spoil taken from the canal – the firing step, and the protection for the troops moving along the landward side, from enemy fire. No Road was intended on the south side, so to site one there, on artificially raised fill, **and to plant it as well**, would confuse the historical authenticity of the Monument's appreciation.

11. As a consequence of the proposed of re-siting re-routing of c 4,500 vehicles on this road (that, as I have acknowledged, is needed to facilitate the building of a housing estate and a Leisure Centre) , the appreciation of the SETTING of the monument would be severely compromised. In effect, the SAM would become a meaningless 'ditch', snaking around the back of the houses.

12. SETTING is described in Historic England's Good Practice Guide No 3 (c)

A precis is offered by a former Chief Inspector of monuments.....

12.a *All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.*

12.b *The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

12.c *The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.*

13. The NPPF (b) (Appendix B):

189: *These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the*

*quality of life of existing and future generations*

*199: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

14. In my own professional opinion, I consider that great harm will be done to the non-designated asset (the existing historical Princes Parade), and to the Scheduled Ancient Monument, by altering their setting and legibility. A level of protection is afforded the former, in the Legislation, but there is no greater protection afforded to a Scheduled Ancient Monument, short of designation as a World Heritage Site, and in this case that great harm should be avoided.

15. Others will add that physical harm may also be done owing to the **proximity of the proposed** realigned **road highway and c.4,500 vehicle movements in such proximity** to the Canal and from the disposal of surface water, from dust, **and** fumes and lighting, but I leave the Inspector to take a view on those issues along with my stated heritage points.

The Evidence I have prepared and provided to this Inquiry.....in this Proof of Evidence is true and I confirm that the opinions expressed are my true professional opinions.

I urge the secretary of State to conclude that he should decline to confirm the Order because of the harm caused to the Royal Military Canal

Roger A Joyce, Dip Arch (Cant), Dip Conservation (AA), RIBA, IHBC, AABC

ref (a) The FHDC Heritage Strategy, in the P&PLP

ref (b) the NPPF 2021

ref (c) HE Good Practice Guide 3. Setting