



Historic England

Planning Policy Team
Medway Council
Gun Wharf, Dock Road,
Chatham, Kent ME4 4TR

[By email only to futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

Our ref: PL00347123

Your ref:

Telephone

Fax

Email

Date

20 June 2018

Dear Sir / Madam

Future Medway: Development Strategy Regulation 18 Consultation

Thank you for your email of 3 May 2018 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's comments are set out detail below broadly in the order that they appear in the draft Local Plan:

Section 2 Vision and Strategic Objectives (Question DS 1) – we appreciate that the vision for the future Medway seeks to achieve the difficult balance of development and regeneration requirements, social needs and the protection and enhancement of environmental assets, including the historic environment. The highlight box on page 20, headed **Developing a vision for 2035**, sets out an ambitious and potentially unachievable picture of the area over the next 20 years; we believe a more realistic portrait may need to be prepared. Having said this, we welcome the references and acknowledgments of the importance of protecting and enhancing the heritage of Medway and integrating this with regeneration of the area. We would hope this level of heritage awareness is retained (if not strengthened) in any refinement of the Vision.

Section 3 Development Strategy (and associated appendices) – it is not for Historic England to comment in detail on the preferred scenario for accommodating the substantial levels of growth planned in Medway derived from the objectively assessed needs and government requirements. In our view, all will have both possible harmful impacts on the historic environment which will need to be avoided or mitigated, and also potential for enhancement of specific sites and places of heritage significance. We comment on some of these below, most of which will be common to all or most scenarios, but all of which will require more detailed assessment of the implications for heritage assets through site briefs, masterplans or planning applications if not through a sites allocations part of the Development Plan. We would be pleased to input to these assessments as they come forward, and have contributed to a number to date – Chatham Interface, Chatham town centre masterplan, Strood masterplan, etc.

Other sites that we have a particular interest in include:

Frindsbury Extra - where securing a sustainable future for the grade I listed barn which is at risk, without harming its setting, is a major challenge. Some housing and a school is proposed in and around the quarry that may be a part of a financial solution to the barn.

Rochester is undergoing significant pressure for development at present, much of it focussed on Corporation Street for residential and hotel development, and the later phases of Rochester Riverside are yet to be finalised in terms of design and form. These locations are of major heritage sensitivity for their potential to affect the setting of the castle and cathedral, in particular, and the historic core of the town. Tall buildings development in these locations and potentially at Bardells Wharf where Rochester meets Chatham Intra should be carefully planned and managed. A robust tall buildings policy is needed for this purpose.

Chatham Intra remains an area which we think is under appreciated for its heritage significance (and thus probably under represented on the National Heritage List for England). It is an area of change which if handled appropriately could unlock major gains for the historic environment. A carefully planned, heritage-led approach to the regeneration of this area is required in our view.

The Hoo Peninsula is in all scenarios for meeting assessed housing need identified for major change. Our published landscape research here should be referenced as needing to inform decisions - <https://historicengland.org.uk/images-books/publications/hoo-peninsula-landscape/>. We endorse the need for masterplans at any of the major locations for potential development. A new rural town centred on Hoo St Werburgh raises some historic environment issues but we need more information to be able to determine if there will be potential harmful effects on the historic environment. We would be pleased to discuss these with the Council and promoters if and when they come forward.

If the principle of major development at Lodge Hill is revisited by Homes England, despite the SSSI issues, then we will need to engage for the former Lodge Hill camp. The ordnance buildings here were considered for listing and are of local heritage significance at least. We would wish to ensure that any masterplan responds to the former layout of the site, and where possible preserves some of the undesignated heritage assets. There are a few designated heritage assets on the site; i.e. a WW1 anti-aircraft gun site as a scheduled monument and WW1 period hardened sentry posts as grade II listed. The AA site is probably a candidate for the heritage at risk register and if development is not to secure its future an alternative plan will be needed to preserve it.

Section 8 Built Environment – Policy BE1 provides a broadly suitable framework for considering the effects of new development and fostering good design. However, as mentioned above, we have been concerned that some proposals for tall buildings, both historically and currently, could have negative, harmful impacts on the setting of heritage assets and that there is not a fully formed policy framework for considering these. Given the density of heritage assets and their ubiquity across the Medway towns, we would recommend a specific tall buildings (and views) policy supported by detailed guidance on the assessments of impacts on views and settings. We would be pleased to advise on this.



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

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Policy BE5 does not adequately set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF paragraphs 126 and 157. It should contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156). The current proposed wording is essentially focussed on controlling development that may affect the historic environment, which may be needed also, but has lost some of the intent behind the NPPF to make conservation of heritage a positive, proactive programme in its own right. A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will make a positive contribution to local character and distinctiveness.

Policy BE5 could be recast in more positive terms along the lines set out in the foregoing paragraphs and much of the text relating to protection of the significance of heritage assets combined with that in policy BE6.

The policy BE5 in its reference to total demolition also mentions public benefits, but the NPPF is clear these should be **substantial** so as to make the test very high and this should be reflected in the wording of the policy.

Para 8.32 has wrongly transcribed the statutory duty of the 1990 Act by describing a need to pay *particular* regard to listed buildings and their settings. The correct term is to have **special** regard and I think this represents a greater weight than reflected in the current wording.

Notwithstanding paragraph 8.30, we consider that the value of undesignated heritage assets, and their potential to contribute to the place making agenda, is under played in the section on historic environment. Medway is full of good but undesignated heritage, Chatham is a prime example, and it would be good to embed an approach which seeks to first identify and then sustain or enhance it where feasible into the general policy on heritage.

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the 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.

Yours sincerely


Alan Byrne
Historic Environment Planning Adviser



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

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

