



Historic England

Ms Claire Shearing
Sevenoaks District Council
Council Offices
Argyle Road
Sevenoaks
Kent
TN13 1HG

Direct Dial: [REDACTED]

Our ref: P01118231

7 August 2020

Dear Ms Shearing

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**DSTL FORT HALSTEAD CROW DRIVE HALSTEAD SEVENOAKS KENT TN14 7BU
Application No. 19/05000/HYB**

Thank you for your letter of 17 October 2019 regarding the above application for planning permission. Our overarching advice is laid out in the letter below, with more detailed comments on the submitted Conservation Management Plan laid out in the appendix to this letter.

Summary

The development will cause some harm to heritage significance, but will also bring considerable heritage benefits by securing a sustainable use for Fort Halstead. We therefore have no objections to the development and consider that it meets the requirements of the NPPF.

If you are minded to grant planning permission for the proposal, we recommend that a condition for an s. 106 Agreement and a revised CMP is attached to any permission granted.

Where harm to historic buildings will occur provision should be made for recording and analysis to an agreed specification, and the curation of documentary archives in an appropriate and approved archive.

You should also consult the Kent County Council Heritage Conservation Team and your own specialist conservation advisors with regard to the treatment of undesignated buildings, structures and archaeological remains.

Where work is proposed within the scheduled monument a prior application for scheduled monument consent will be needed. We will be pleased to offer further guidance and to advise about scheduled monument consent applications in due



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course.

Historic England Advice

The Previous Application

A variation of this proposal was last applied for in 2019, under planning reference 19/05000/HYB. Our consultation response (on 20 November 2019) raised some concerns about the proposed design of the village centre next to the scheduled Fort Halstead.

We were supportive of the plans to repair and re-purpose the fort, but stated that further detail would be required in respect to this aspect of the development. We therefore recommended that conditions for a Conservation Management Plan and an s.106 Agreement were attached to any permission granted.

The Current Application

The current application is for a slightly revised scheme to that applied for in 2019. The revisions include a reduction in the total amount of housing provided (635 houses down from 750 houses), and the safeguarding of land within the master-plan for a school. A revised CMP for the fort has also been submitted. The design of the village centre remains the same.

We do not have any concerns or comments with regards to the reduction in housing or the safeguarding of land for a school. Although we previously had concerns with the design of the village centre, we have since had the opportunity to make a site visit and have detailed discussions with the applicant's heritage consultants (RPS Heritage) about this aspect of the proposal; the results of which are accurately described by RPS Heritage within their Heritage Note.

Although the proposed village centre design will cause some harm to heritage significance, we consider that RPS Heritage has now convincingly demonstrated to us that this design has been carefully crafted in such a way that balances the need to respect heritage significance with that to create a new strong, vibrant and healthy community. It therefore seeks to pursue environmental, social and economic objectives simultaneously; in order to create a truly sustainable development in line with the requirements of the NPPF (para. 8).

Kent County Council and your own specialist conservation officer will be your main advisors with regard to undesignated archaeological remains and unlisted structures, respectively, and we do not anticipate commenting in detail on these aspects of the application.

The Conservation Management Plan

A revised Conservation Management Plan was submitted with the application which



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sets out the vision for the future of the scheduled fort and what provision will be made for this as part of the overall development. We are encouraged to see that this document provides more detail and consideration of relevant issues than previous iterations. The understanding of the fort's history and significance in particular is very well-researched and presented within this revised plan.

The broad proposals presented within the CMP for the use of particular buildings within the fort represent a plausible approach to their conservation and sustainable use. However, we continue to think that the CMP does not yet provide the level of detail that will be required to be confident of a successful and viable future for the fort.

It does not yet adequately address detailed conservation objectives, the financial feasibility of a heritage interpretation centre, or detailed management and conservation issues; such as condition surveys, maintenance, repairs, landscaping, security, provision of facilities and interpretation, and the curation of documentary archives, which might all have an impact on the heritage significance of the place.

We are nevertheless content that this additional level of detail could be achieved by conditioning a revised Conservation Management Plan as part of any planning permission granted.

Section 106 Agreement

As noted within previous advice, we think that an s.106 agreement will also be essential to ensure that adequate provision for the future management of the fort will be made at key stages of the development process. An s.106 agreement will ensure that the proposed objectives for the fort's future repair, use and maintenance are properly managed and achieved in line with agreed timescales. It is also necessary to avoid the potential neglect of heritage significance in favour of other duties and unintended consequences (such as a right for future owners to buy property that is intended to provide revenue for management).

We think that an s.106 Agreement should be conditioned as part of any planning permission granted.

We would be pleased to advise the applicant and the council on what further steps will be required to revise the Conservation Management Plan, and provide a satisfactory s.106 Agreement. We would be pleased to discuss the CMP and s.106 Agreement in more detail with your authority and the applicant, and welcome further discussion with both parties. However we do also provide some initial comments and recommendations regarding the CMP and s.106 Agreement within the attached appendix.

Recommendation



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We do not object to the application on heritage grounds and consider that it meets the requirements of the NPPF.

We are pleased to see that the application includes provision for the repair, conversion and use of the scheduled monument into the future; however we think further detail and reassurances are required to ensure that these aims and objectives are achieved, and in line with agreed timescales.

We therefore recommend that, if you are minded to grant planning permission, this is granted with conditions for a revised Conservation Management Plan and a s.106 Agreement. We would welcome further discussion with yourselves and the applicant with regard to this aspect of the development.

Finally, you should also consult the Kent County Council Heritage Conservation Team and your own specialist conservation advisors with regard to the treatment of undesignated buildings, structures and archaeological remains.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely



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