



Appendix

Conservation Management Plan (CMP)

The bullet-pointed text below denotes advice and recommendations that Historic England gave regarding the CMP as part of our consultation response to the 2019 planning application. We have provided additional comments and recommendations below this initial advice; where it may be helpful and relevant.

- 1) “The Management Plan’s proposed use of particular buildings represents a plausible approach to the conservation and sustainable use of these buildings. However we think that it does not yet adequately address the financial feasibility of the proposed heritage interpretation centre model.”

Our position in this regard remains unchanged; we think that the proposals submitted are sensible and plausible but we cannot yet know whether they will be financially achievable and viable, as this has yet to be formally assessed in detail.

We would thus recommend that the next step in developing the CMP should be the production of a thorough viability assessment, in combination with market appraisal and cost analysis. These studies should be undertaken by fully experienced and qualified viability and cost consultants. Matters assessed as part of this study would include (but not be limited to):

- Consumer profiles and preferences; local/regional tourism trends and anticipated desire for such an attraction; user compatibilities
- Existing transport links, connectivity opportunities and constraints
- Existing infrastructure (e.g. services, utilities)
- Parking and access requirements
- Expected visitor numbers
- Desire/need for proposed craft workshops (or other possible complementary uses)
- The types of expertise that will be required to develop and manage such an attraction
- Estimated number of paid staff and/or volunteers required



- Cost of repairs, maintenance and day to day running
- Indicative earnings and expenditure estimates over the short-long term
- Estimated initial injection of cash required, and time taken to become self-sustaining
- Access and health & safety audits and requirements
- Logistical and economic viability of management via a Community Trust; Charitable Incorporated Organisation; Management Company; other governance structure
- Logic of development phasing; implementation strategy

Such an assessment should succeed in providing a much more certain and nuanced understanding of whether the proposed plan for Fort Halstead will be financially viable; or, if not, what revisions or changes may be required in order to make it so.

- 2) “More information should be provided about what maintenance, repair, refurbishment and other enabling work is necessary to transfer the fort and to adapt it into a heritage interpretation centre, including the adaptive use of particular buildings.”

There is a general acknowledgement within the revised CMP that repair, maintenance and refurbishment will be required, however as yet this has not specified or analysed in any further detail. We would therefore suggest that the next step in this regard should be to undertake condition surveys of the Fort Halstead structures/buildings (if this has not been done already) in order that this may inform a comprehensive and timetabled programme of repairs, refurbishment and maintenance that can be included in the CMP.

More details on the specific uses of the different buildings/structures (as informed by viability assessments, discussed above) will also be required in order to be able the specification of necessary enabling works to the buildings, so that they may effectively be used for their intended purposes.

- 3) “More information should be provided regarding provision to reveal key views and aspects of the fort’s setting.”

We are pleased to see that the revised CMP includes acknowledgement of the need to reveal key views and aspects of the fort’s setting. However, currently the report



does not progress beyond an intention to provide for this, and includes no more detailed information on the specific aims or proposed methodologies for such. We recommend that further assessment and consideration should be given to:

- Which specific key views/aspects of setting should be revealed and thus which areas of vegetation/trees will require removal
 - Whether tree removal/retention will have any structural impact on the historic fort (as informed by an arboriculturalist)
 - Whether any ecological considerations will need to be taken into account (as informed by consultation with Natural England).
- 4) “Agreement of the details of the structure, governance and funding of a community trust or management company, which should demonstrate specific duties and protections with respect to the conservation of the fort and any other heritage assets for which it will be responsible.”

It is positive that the CMP does highlight a number of different possible governance structures for the future management of the fort. Possibilities highlighted include: a Community Trust, a Charitable Incorporated Organisation, or a Management Company. Possible funding streams suggested include: the gifting of a proportion of intermediate rented affordable housing units (1.17); or na s.106 financial contribution (1.19). The report also acknowledges that still other options may be possible (1.20).

This is a very encouraging start, and what is required now is for the suitability and viability of these (and, if necessary, other) possibilities to be assessed within the aforementioned viability assessment (see above).

It is important to note that establishing and managing an interpretation centre (with ancillary craft workshops) on this scale (as proposed) is a complex endeavour that will require a considerable amount of time and relevant expertise. Many of the governance structures so far proposed rely heavily upon volunteers (6.12) who may not necessarily have the relevant skills, experience or time. A viability assessment is thus needed to test whether these options are viable in this particular situation.

A detailed understanding of the financial viability and mechanisms of the wider development is also essential in order to properly assess this matter. For instance, we note that the Financial Viability Assessment (May 2020) submitted concludes that “the proposed development can viably support no affordable housing on a present day basis” (Appraisal Results, page 1); and yet the Management Plan proposes that one possibility for funding the fort’s re-use is through the gifting of a proportion of intermediate rented housing units “as part of the affordable housing provision.”



Section 106 Agreement

Information within the S106 Agreement should include detailed information on the following:

- a) Agreement that a detailed management plan for the fort will be submitted for approval of the Council and Historic England prior to completion of the development. This should include details of the structure, funding and governance of the body selected to take responsibility of the fort's future and on-going management.
- b) Agreement that the retained heritage assets will be repaired marketed and occupied at key stages of the development process. We think that the following action should be completed in relation to all the retained buildings before agreed milestones:
 1. Comprehensive external repairs will be carried out in accordance with a schedule of works to be agreed in advance by the Council and Historic England.
 2. If conversions are not being carried out by the applicants, 'shell and core' type alterations should be carried out in compliance with approved details.
 3. Active marketing should take place at realistic prices, and tenures for suitable uses and with appropriate curtilages offered according to a strategy to be approved in advance by the Council.
 4. The retained buildings should all be in use prior to agreed milestones, and at the latest before the final 20 units are occupied.