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SENT BY EMAIL

Re: SE/19/05000 – Fort Halstead Crow Drive Halstead Sevenoaks

Thank you for the further consultation on the hybrid application for redevelopment of Fort Halstead including demolition of buildings, development of mixed-use development comprising business area, and associated works. I am sorry for the delay in providing comments but I hope they can still be considered. These comments refer to the current consultation but my comments made on 9 December 2019 are still relevant.

My comments do not relate in detail to the Scheduled Monument of Fort Halstead because comments by Historic England and the District Conservation Officer would take precedent. I note the comments by Historic England for this current consultation and I fully support their comments. I note they are not entirely happy with the CMP and are keen to see revisions to the CMP and be consulted on the S106 Agreement covering the interpretation centre. Again I fully agree with their concerns.

In my previous letter I did state: “Although there are some heritage concerns, it may be that further assessment can be undertaken prior to detailed consents being determined on the outline part of the application site.” This is essentially still the case but I would like to express concern over the limited development of the approach to the historic environment. Submission of this new revised scheme does not seem to have included development and enhancement of the consideration and mitigation for non-designated heritage assets.

The Heritage Note by RPS provides up dated assessment of the significance of the fort as a SAM. There seems to be no updated consideration of non-designated heritage assets in the wider complex. The focus is just on the fort and there has been no additional consideration of buried archaeology and archaeological landscapes. There may be some elements of both buried archaeology and archaeological landscapes which could be considered to be significant and mitigation would need to have capacity to accommodate significant non-designated archaeology. This may include key archaeological landscape features which are above ground and are especially associated with the 20th century research establishment.

These assets are particularly vulnerable to initial stages of development including clearance and demolition. As such early consideration is essential.

I have raised the concern regarding lack of consideration of the archaeological landscape of this site; meaning the 20th century fixtures and fittings, buried structures, spaces, non-designated buildings, pipework, rifle ranges, specimen tree planting, avenues, etc, several times. And it is still not being sufficiently considered. Fort Halstead was a highly significant 20th century military research complex. The SAM fort was part of this complex but its use for the 20th century activities was restricted. The rest of the site contains highly significant non-designated features which may be of equivalent importance to the SAM. As such this needs to be addressed in a Heritage Note.

The Archaeological DBA has not been updated and does not sufficiently address the 20th century archaeological landscape issues.

The Non-technical Summary mentions consideration of Historic Environment but the Archaeology section only considers “buried remains” and the Built Heritage only considers buildings, not structures. There is no consideration of archaeological landscapes. The features within this archaeological landscape are very vulnerable and sufficient consideration is essential prior to demolition and landscaping works. This consideration is needed because there will be some elements which can be preserved and conserved and integrated into the proposed development. This would address sustainability of the historic environment and address NPPF section 16, paragraph 185, which does encourage regard to “conservation and enjoyment of the historic environment”. This proposed development does offer a fantastic opportunity to utilise remnants of a rare and robust heritage resource of the 20th century research activities.

For this current proposed scheme, I note that Historic England are supportive of the scheme with some requirements regarding a revised CMP and need for a S106 Agreement on the Fort itself. As such I consider none of the archaeological and archaeological landscape issues form a major constraint on the proposed broad re-development. However, I would welcome greater consideration of archaeological landscape issues. I have recommended a specific condition regarding mitigation for archaeological landscapes but greater consideration at an early stage to prevent loss of key features during the demolition stage is essential.

If it is considered necessary to determine this outline application at this stage I recommend the following conditions are placed on any forthcoming consent:

- 1 Prior to commencement, including demolition, the applicant, or their agents or successors in title, will secure the implementation of a programme of historic built environment recording in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that historic building, structures and features are properly examined and recorded.

And

- 2 *Prior to commencement, the applicant, or their agents or successors in title, will secure the implementation of an archaeological impact assessment in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that the archaeological mitigation is suitably informed.

- 3 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of*
- i archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and*
 - ii following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority*

Reason: Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority is satisfied that the requirements of this condition (including the timing of compliance) are so fundamental to the development permitted that such details must be submitted prior to the works, other than demolition works, commencing on site. This is because, at the time of granting permission, full details were not yet available but this information is necessary to ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

- 4 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of*
- i archaeological landscape survey and assessment in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and*
 - ii following on from the archaeological landscape assessment, any safeguarding measures to ensure preservation in situ of important archaeological landscape features and/or further archaeological landscape recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority*

Reason: Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority is satisfied that the requirements of this condition (including the timing of compliance) are so fundamental to the development permitted that such details must be submitted prior to the works, other than demolition works, commencing on site. This is because, at the time of granting permission, full details were not yet available but this information is necessary to ensure appropriate assessment of the

archaeological landscape implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

- 5 *No development shall take place until fencing has been erected, in a manner to be agreed with the Local Planning Authority, about sensitive archaeological landscape features (as identified by the archaeological landscape survey); and no works shall take place within the area inside that fencing without the consent of the Local Planning Authority.*

Reason: To ensure that important archaeological landscape features are not adversely affected by demolition or construction works.

- 6 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of heritage interpretation strategy in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that heritage of this site is suitably accessible to future generations.

In addition to these conditions, I recommend the need for a Conservation Management Plan for archaeological landscapes which would be used to preserve in situ significant elements of the archaeological landscape and for interpretation across the entire site. A CMP for archaeological landscapes should be compatible with the CMP for the fort SAM.

Mitigation measures should be put forward as part of the application and these should include long term conservation measures and identification of visionary interpretation. It may be considered appropriate to cover heritage interpretation issues as part of a S106 Agreement and I would be happy to discuss this further. I note no “visionary interpretation” has been submitted with this revised scheme and I suggest this should be part of the drafting of CMPs for heritage.

I hope this information is useful but I would be pleased to discuss further.

Yours sincerely

Wendy Rogers

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Heritage Conservation Group