

Heritage Collective LLP

Lodge Hill

Outline Planning Application on behalf of Defence
Infrastructure Organisation

Heritage Statement (Built Heritage)



Prepared by Heritage Collective on behalf of Land Securities
and the Defence Infrastructure Organisation

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This document forms part of a suite of documents which comprise the
Lodge Hill Outline Planning Application.

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Authored by:	Ignus Froneman
Reviewed by:	Jon Lowe
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1.0 INTRODUCTION

- 1.1 This Heritage Statement has been produced by Heritage Collective LLP, on behalf of Land Securities and the Defence Infrastructure Organisation (DIO). It is submitted as a supporting document to the outline planning application for a new settlement on the site known as Lodge Hill and it considers the heritage effects of the proposed development on the heritage significance of the site.
- 1.2 The Heritage Statement is not a standalone document and it should be read alongside the other information submitted with the application. Specifically, the *Built Heritage Baseline Assessment Report* (May 2009, revised June 2009) that has been included as Appendix 6E to the Lodge Hill Environmental Statement (ES), as well as Chapter 6 of the ES, which assesses the sensitivity of the heritage assets on the site (archaeological remains and built heritage features) and the likely significant effects of the proposed development on these heritage assets.
- 1.3 For consistency and ease of reference, this Heritage Statement has adopted the building numbering system and nomenclature of the *Built Heritage Baseline Assessment Report* and Chapter 6 of the ES. Figure 3 of the *Built Heritage Baseline Assessment Report* identifies each of the buildings on the site.

Background to the application

- 1.4 The potential heritage value of the Lodge Hill site was recognised from the outset. It has been a key consideration that has shaped the evolution of the indicative masterplan, which demonstrates how the outline application could be implemented.
- 1.5 In November 2008 English Heritage commenced a review of seven structures for spot listing. Land Securities and the DIO consulted with English Heritage and it was agreed to broaden the heritage protection review to include all of the structures on the whole of the site. It was agreed that this site-wide assessment would provide certainty on the baseline heritage constraints and inform the development of the masterplan.

- 1.6 The applicant accordingly produced a *Built Heritage Baseline Assessment Report* (Appendix 6E to the Environmental Statement), which includes an overview of the historic development of the site and its buildings, to assist in the listing review. The listing review was duly suspended and resumed in June 2009, following presentation of the *Built Heritage Baseline Assessment Report*. The *Built Heritage Baseline Assessment Report* was also used by Land Securities' design team as a valuable information resource.
- 1.7 After reviewing the assessment, English Heritage identified 60 structures which could have designation potential. In January 2011 English Heritage concluded that 34 of the 60 structures under review would not be listed. In May 2011 four of the buildings reviewed – all of the WWI sentry posts within the site – were grade II listed. The heritage protection review is on-going at the time of writing, with 22 of the structures still under review (including two WWI sentry posts outside of the site).
- 1.8 During this time, the applicant has engaged with Medway Council and English Heritage in regular consultation with regards to the heritage of Lodge Hill. Together with the detailed assessment of the built heritage, constraints and opportunities have been identified and the masterplan was able to respond to the potential for listing from an early stage. These constraints and opportunities were fed into the indicative masterplan as part of an iterative process. The form, layout and overall patterns of development, as well as boundaries and circulation/routes have all been influenced by heritage considerations; in turn this is reflected in the outline planning application.
- 1.9 Neither Medway Council nor English Heritage have expressed concerns about the effects of the masterplan on built heritage.

The subject site and the core areas

- 1.10 The Lodge Hill site has evolved over a period of 138 years and it comprises several different parts, some of which represent historic phases of development. These have been distinguished as 'core areas' and they have been referred to as such in numerous documents (the core areas

are shown in Figure 2 of the *Built Heritage Baseline Assessment Report*). For clarity and ease of reference, the core areas are listed below:

- i Chattenden Barracks;
- ii Chattenden Magazine Enclosure;
- iii Lodge Hill Camp;
- iv Lodge Hill Training Area (formerly Magazine Enclosure); and
- v Lodge Hill and Perimeter (north and eastern land parcels).

1.11 The core areas, and the structures contained within them, are described in Section 2 of the *Built Heritage Baseline Assessment Report*. Section 3 of this statement provides a general overview of each of the core areas.

Heritage assets

- 1.12 The heritage significance of the Lodge Hill site, including its individual constituent elements, has been the subject of detailed assessment and consideration, in consultation with English Heritage, Medway Council and their archaeological advisors at Kent County Council, since 2008.
- 1.13 The four grade II listed WWI sentry posts on the site are designated heritage assets in accordance with the definition in Planning Policy Statement 5 (PPS5), *Planning for the Historic Environment* March 2010.
- 1.14 The other 20 structures within the site which are presently still under review for listing includes a group of 5 WWI buildings/structures that make up the Lodge Hill Battery (believed to be the first anti-aircraft battery in Britain) and the remaining 15 are WWII pillboxes.
- 1.15 For the purposes of the assessment the structures still under review for listing have been treated as listed buildings (or designated heritage assets). There are therefore 24 designated heritage assets on the site. A further two WWI sentry posts that lie beyond the site boundary and which are presently still under review for listing have also been considered as nearby listed buildings.

1.16 There are no locally listed buildings on the site. However, the Environmental Statement for the application has individually assessed each of the structures on the Lodge Hill site to determine whether they would qualify as heritage assets that are not designated (undesigned heritage assets). That assessment has identified a further 41 structures that can be considered to be undesigned heritage assets and they have been included here.

Scope, purpose and structure of this statement

1.17 This Heritage Statement relates to heritage matters of a non-archaeological nature (Built Heritage, which is defined as the material post-1870 military legacy of the site). Archaeology is dealt with in the ES and within the relevant archaeological documents appended to the ES.

1.18 The purpose of this document is twofold:

- i Firstly, to provide Medway Council with sufficient information about the significance of the heritage assets potentially affected by the proposed development (including their settings, where relevant). The information is proportionate to the importance of the assets and sufficient to understand the potential impacts of the proposed development on their significance.
- ii Secondly, to provide Medway Council with an assessment of the impact of the proposed development on the significance of the heritage assets.

1.19 Following the Introduction, the Heritage Statement is structured into 5 sections. Section 2 provides a summarised historic background of the Lodge Hill area, with a summary of the site, the core areas and the heritage assets at Section 3. Section 4 contains an overview of the relevant heritage related policy and Section 5 considers the significance of the heritage assets and the impacts of the proposed development. Section 6 then concludes with a summary.

2.0 HISTORIC BACKGROUND

2.1 The *Built Heritage Baseline Assessment Report* provides a detailed contextual historic background of the Lodge Hill site and its development. The following section summarises the 7 main historic periods, which corresponds with the successive phases of development which have shaped the site and resulted in its present state.

2.2 Prior to the 19th century the site comprised a mix of woodland, farmland and pasture on the valley slopes and floor. The topography of the site and the areas of historic woodland would later come to play important roles in the strategic defence of the site.

Phase I - 1873-1898 (the original Chattenden Magazine and Barracks)

2.3 This period represents the first occupation of the site in response to increased demand for munitions storage and the provision of barrack accommodation. The areas first occupied were the Chattenden Barracks and Chattenden Magazine enclosure. These form two core areas and at the time only rail infrastructure extended beyond these areas (through what would become the Lodge Hill Enclosure). Munitions had been stored at Upnor but that site was at capacity and unable to expand due to land constraints.

Phase II - 1899-1912 (munitions storage expansion and manufacturing)

2.4 This period represents not only the need for expansion for munitions storage, but also the introduction of a manufacturing establishment. The site chosen and laid out was the Lodge Hill Enclosure, now the Lodge Hill Training Area core area.

Phase III - 1913-1917 (World War I strategic defence)

2.5 This period covers World War I. During World War I the defensive capability of both the site and the strategic defence of the area were improved. The first anti-aircraft gun emplacement in Britain was constructed at Lodge Hill, and sentry posts to guard the magazine enclosures and their road or rail approach were built.

Phase IV - 1918-1937 (inter-war development)

2.6 The inter-war period saw further development and enhancement of the manufacturing and storage facility. New buildings were added (although most of these have since been demolished) and existing buildings were altered to better serve the purposes for which they were built or to adapt to new uses.

Phase V - 1938 - 1945 (the Second World War)

2.7 During WWII the security and defence of the site and its perimeter were improved. The construction of Pillboxes and anti-tank ditches (now back filled) formed the key building activity and this covered land immediately north and east of the site, and served as part of a national scheme for Stop Lines. Within the site there was provision of air raid shelters and the reinforcement of some buildings. The need for munitions storage was still a critical issue and temporary magazines (Nissen Huts) were constructed at the Lodge Hill Camp core area, and beyond the site at Grain.

Phase VI - 1946 - 1960 (demise of manufacturing and munitions storage)

2.8 The post war era saw the demise of manufacturing and munitions storage at the Lodge Hill Enclosure and little development across the site. The key activity at this time was the gradual transition of the Lodge Hill Enclosure for training purposes.

Phase VII - 1961 - 2011 (training)

2.9 This period saw considerable change to the site. A road infrastructure replaced and improved upon the rail network and all manufacturing-related buildings were demolished. A new barracks complex was built (and has since been demolished) at Chattenden Barracks and numerous new structures or alterations to existing buildings were undertaken to provide training facilities for the Royal School of Military Engineering. The Lodge Hill Camp site was constructed during this period and generally the character and built form of the site was altered due to these changes in usage.

3.0 SUMMARY OF THE SITE, CORE AREAS AND HERITAGE ASSETS

The site

- 3.1 In terms of its topography, the site can be divided into four distinct zones. From north to south these are:
- i A dominant east west ridge of high ground rising from 74m AOD at the former Lodge Hill House to a point of 85m AOD just east of Lodge Hill Wood. This falls within the core area 'Lodge Hill and perimeter'.
 - ii A valley floor to the south of the ridge, extending east west with a narrow neck on the west between Lodge Hill Camp and Round Top Wood on the south. This area covers the Lodge Hill Training Area core area.
 - iii The small hill at Round Top woods rising to 70m AOD to the southern and southwest edge of the valley. This covers the Chattenden Magazine core area.
 - iv Low lying area of ground on the south west of the site at 35-40m AOD. This covers the Chattenden Barracks core area.
- 3.2 The site still includes, or is bounded, by historic woodland and elsewhere new woodland has been established through lack of management over several decades.

The core areas (See Figure 2 of the *Built Heritage Baseline Assessment Report*. Building numbers relate to Figure 3 of the same document)

Chattenden Barracks

- 3.3 This area includes the southern road approaches, Chattenden Barracks and land extending north, comprising of former playing fields and Round Top Wood. It is defined by high chain-link fencing and security gates leading from Five Ways Roundabout in the south. The area is entirely shaped by its former usage, with the road and roundabout having been built in the 1960's, when the barracks was built.

- 3.4 This core area is largely void of standing buildings following the demolition of the main barracks (1870s and 1960's parts) after they were vacated in the 1980's. The Chattenden Barracks is characterised by hard standing to the south and open ground to the north and west. The eastern part of this area is bound by modern housing development outside of the site boundary and overgrown playing fields within the site. The western parts of this area are defined by a tree belt along Lochat Road.

Chattenden Magazine Enclosure

- 3.5 This core area contains 33 standing structures and three distinct character areas: (i) the walled magazine enclosure on the north facing valley slope of Round Top Hill, (ii) the barracks/accommodation area on the east side of Round Top Hill and flanking Lodge Hill Lane, and (iii) Round Top Hill woodland immediately south of the enclosure.
- 3.6 The magazine enclosure is defined by a tall brick wall with metal spiked top rail (Building 109). The wall on the south side has mostly collapsed and been replaced by a modern fence due to land slippage. The north, east and wet sections of the perimeter wall survive though have been altered, repaired or replaced in sections. Where missing, the brick wall has been replaced by metal fencing.
- 3.7 Each of the 5 magazine buildings (Buildings 113-117) face north, are set with traverses excavated from the valley side and are approached by concrete hard standing where rail lines were once fixed.
- 3.8 The barracks and accommodation area is dominated by North Terrace (Building 177) and Central Terrace (Building 178).
- 3.9 The core area includes four WWI sentry posts (Buildings 106, 127, 199 & 200), two of which (Buildings 199 & 200) lie beyond the site boundary. These are positioned on elevated ground and would have patrolled this southern approach to the site. The two within the site are grade II listed. Immediately north of Round Top Hill Woodland is a strip of cleared ground, defined on the north by the perimeter wall to the magazines. The magazine enclosure has a single WWI pillbox (Building 106) guarding the former western entrance to the magazines.

Lodge Hill Camp

- 3.10 This area forms a distinct land parcel on the west side of Lodge Hill Lane, at its north end. The area is enclosed by metal fencing and is entirely used for training and office use. The ground appears to have been levelled, with a slight rise to the north. The north and west sides are woodland.
- 3.11 The area includes 57 buildings or structures and has the highest built density, but the buildings are almost exclusively modern (post-war). The buildings here are surrounded by hard standing, landscaped areas and lawns. The southern and northern parts of the area are less dense with the former being laid to lawn and the latter being of mixed landscape for training purposes.
- 3.12 The central building group are mostly single storey training or office blocks and are supported by ancillary structures and plant facilities. The southernmost building of the area is a large single storey yellow brick former electricity generating station (Building 134) that was flanked by smaller structure that originally served as a water tower (Building 132 - now reduced in height). These two buildings, together with a now ruinous railway platform formed a group of c.1900 buildings, together with Building 138 at the west entrance to the Lodge Hill Magazine enclosure.
- 3.13 This area was historically called Forty Acre field and was used in the lead up to WWII for the construction of Nissen huts as temporary magazines. Of the 12 pairs built, only 1.5 pairs survive and these have been mostly rebuilt and adapted. The Nissen huts were removed in the 1960's when this area became developed as the Lodge Hill Camp and the northern parts of the area are now given over to training activities.
- 3.14 Scrubland extends to the west of the area, along the south side of Great Chattenden Woods.

Lodge Hill Training Area

- 3.15 This is the largest land area at the site and comprises a much altered and largely levelled wide valley floor. The area includes 108 standing or ruinous buildings or evidence of structure and it is defined by a high steel perimeter fence.

- 3.16 The area was first defined as a magazine enclosure from 1899 but was later extended to include Deangate Woods. A grade II listed WWI sentry post (Building 219) had once defended this smaller perimeter, but it is now isolated within the later enclosed space. Another grade II listed WWI sentry post (Building 67) is sited at the southwest, on the site boundary, where it overlooks the land to the south of the site (where there is another pair of WWI sentry posts).
- 3.17 The character of the area is taken from its agricultural past but has been much altered in the post-war era due to a lack of landscape maintenance and the use of the area for training; both have significantly affected the character and introduced strong or intrusive visible elements. The historic military land use is evident and has been principally shaped by the former rail infrastructure (now almost entirely lost), which comprised a main east west line with perpendicular cross routes linking the magazines. The magazines have also been a key character element, although it is not so much attributable to the buildings as the traverses and associated tree belts.
- 3.18 Manufacturing areas were concentrated in an area now largely void of buildings, to the west of Buildings 100 & 101. All of the manufacturing buildings have now been demolished and the area is turned over, with large areas of spoil.
- 3.19 In the south east corner of the area two large sheds (Buildings 64 & 65) represent a brief period of interwar development at the site, when additional magazines were constructed as shell stores and linked to the existing network of rail lines. The area includes numerous WWII air raid shelters that served the workforces manning the magazines and the munitions manufacturing structures. It is likely that many have been removed during later site uses.
- 3.20 The modern training buildings/facilities range in scale and type. Most are small and of a semi-permanent nature, whilst others form complete building groups (e.g. Cupar Street - Buildings 56-63). Training is also carried out in converted or re-used magazine buildings and open areas.
- 3.21 The westernmost building group is historically referred to as West Gate. This forms a discrete building group that relates to, and is contemporary with the

former (c. 1900) electricity generating station (Building 134) within the Lodge Hill Camp core area.

- 3.22 To the north of West Gate and located within the perimeter of the area are modern huts, shelters and 'Portakabins' within a secured compound. Open areas to the north of the magazines now have aggressive land uses.
- 3.23 The central strip of land that extends through the entire area is flat and dominated by the spine road. The road and the flanking land enable a clear view through the site.
- 3.24 Eastgate, at the eastern end of this area, is a now a largely redundant historic access and is void of buildings. The gate historically formed the rail traffic exit from the magazine compound and was associated with now demolished rail transfer sheds and ancillary buildings to its west. A road leading to the south from Eastgate and following the perimeter of the compound passes a WWII pillbox (Building 28), associated with the GHQ stop line and the defence of the enclosure.

Lodge Hill and Perimeter

- 3.25 This area is mainly characterized by open fields and woodland on the Lodge Hill ridge and its southern and northern slope. There are 28 buildings, most of which relate to the defence of either the perimeter of the Lodge Hill magazine enclosure and/or as part of the GHQ Stop Line. The buildings are predominantly WWII pillboxes that are arranged along lines that are no longer demarked by anti-tank ditches, but that are evident in WWII aerial photographs.
- 3.26 A key building group is the 5 Lodge Hill Anti-Aircraft battery structures (Buildings 12 - 16). These are semi-ruinous but are historically important remains that date from 1913-14: this is the first permanent anti-aircraft defence in the British Isles. The buildings and the surrounding land are now used for grazing cattle, a use that may have accelerated their deterioration.

Designated heritage assets

- 3.27 The four grade II listed WWI sentry posts on the site are presently the only designated heritage assets. Two of these fall within the Chattenden Magazine Enclosure, with another two in the Lodge Hill Training Area.
- 3.28 The WWI sentry posts are similar in form and construction. They are constructed in reinforced concrete and it is believed that they would have functioned as points of refuge under fire, rather than being permanently occupied. Based on current evidence these are a locally distinct form of sentry post, all known examples of which are confined to Medway.
- 3.29 The sentry posts are one or two-man concrete shelters, approximately 2.5m in height and of polygonal (11-sided) shape, with shallow domed roofs. The walls are approximately 30cm (1 foot) thick and built in circa 2 feet (60cm) sections; the roofs were constructed using a corrugated shuttering, left in situ. Access is through small, heavy hatched reinforced concrete doors with steel bar handle and external hinges. The posts have five observation apertures located on alternate sides, with an external horizontal splay approximately 70cm wide. These could also have served as small arms embrasures for handguns.

Buildings under listing review, treated as designated heritage assets

- 3.30 A further 20 structures within the site are presently still under review and these can be categorised into two groups:
- i the Lodge Hill Battery, comprising 5 WWI buildings/structures;
and
 - ii 15 WWII pillboxes.
- 3.31 The Lodge Hill Battery group forms a diamond-shape, with its long axis broadly north-south. In the centre of the group is the Ammunition, Artillery Store and Officers' Quarters, flanked to the north and south by two gun emplacements. A war shelter is at the point of the diamond to the east and there is a defensible barracks building in the opposing position to the west.

- 3.32 The two gun emplacements comprise circular concrete emplacements (9.68m in diameter), with a central (5.5m diameter) gun floor, surrounded by a perimeter path.
- 3.33 The war shelter is a reinforced concrete blockhouse or pillbox type structure. The defensible barrack is an irregular V-shaped building of red brick English bond with a flat, reinforced concrete roof which is covered in asphalt. The ammunition, artillery store & officer quarters is a single storey building raised in red brick red brick and with a reinforced concrete slab roof.
- 3.34 The Lodge Hill Battery is sited on a prominent ridge with far reaching views over the Thames estuary to the north. Its sister battery at Beacon Hill was located to its south, also on a prominent hill overlooking the River Medway to the south and south-east. Between them they protected the ordnance depots and the approaches along the two rivers.
- 3.35 The WWII pillboxes are constructed in reinforced concrete and they fall into 5 types:
- i WWII type 24 pillbox (2 examples);
 - ii WWII type 25 pillbox (1 example);
 - iii WWII type 28 pillbox (1 example);
 - iv WWII type FW3/24 pillbox (7 examples); and
 - v WWII type FW3/28 pillbox (4 examples).
- 3.36 The majority of the pillboxes lie at the periphery of the site, or in woodland (or both). These are 'outward looking', i.e. they face the land outside of the site, rather than the site itself, and they are not readily intervisible with each other. The exceptions are a group of four pillboxes along the east of the Lodge Hill Training Area (Buildings 18, 19, 20 and 21), which face towards the Lodge Hill Training Area and there is intervisibility between each pillbox. Another pillbox (Building 30) guarded Lodge Hill Lane.

Undesignated heritage assets

- 3.37 The undesignated heritage assets fall into 7 categories:

- i 5 Magazines that form part of the original Chattenden Magazine (Buildings 113; 114; 115; 116 and 117);
- ii the Chattenden Magazine Compound Wall (Building 109);
- iii a disarticulated WWII pillbox (Building 31);
- iv 5 magazine ancillary structures (Buildings 81; 118; 120; 122; and 126);
- v 14 magazine buildings that form part of the expansion of the original Chattenden Magazine (Buildings 34; 35; 45; 46; 49; 50; 51; 64; 65; 66; 77; 82; 89 and 92);
- vi 6 19th century infrastructure or accommodation buildings that form part of the expansion of the original Chattenden Magazine (Buildings 134; 137; 138; 177; 178; and 180); and
- vii 9 WWII air raid shelters (Buildings 10; 22; 23; 24; 26; 124; 223; 224; and 225).

3.38 The undesignated heritage assets are described in detail in the *Built Heritage Baseline Assessment Report*.

4.0 POLICY OVERVIEW

Legislation

- 4.1 Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16 and 66 of the Act place a duty on the decision maker to have special regard to the desirability of preserving listed buildings and their settings.

The draft National Planning Policy Framework

- 4.2 A consultation draft of the National Planning Policy Framework was published in July 2011. It is a consultation draft, although it does indicate the likely thrust of the forthcoming National Planning Policy Framework. In essence, a presumption in favour of sustainable development is propagated, although the policy framework seeks to secure protection and enhancement of the natural, built and historic environment. The part of the draft framework that relates specifically to the historic environment is broadly similar to PPS5, albeit more concise.

National policy

- 4.3 National policy relating to the historic environment is contained in Planning Policy Statement 5 (PPS5), March 2010. The policies in PPS5 are a material consideration which must, where relevant, be taken into account in development management decisions. The PPS5 policies can therefore be applied directly by the decision maker when determining whether a development should proceed.
- 4.4 PPS5 is accompanied by a Historic Environment Planning Practice Guide (the 'Practice Guide' hereafter), also published in March 2010. This is an explanatory document that was produced jointly by the Department for Communities and Local Government, the Department for Culture, Media & Sport and English Heritage. The Practice Guide does not introduce additional policies, and it does not add to the policies in the PPS. It is not a policy document and it is not discussed here.
- 4.5 PPS5 covers all aspects of the historic environment, of which listed buildings are components or constituent elements. The PPS introduces the concept of

'heritage assets', which are valued components of the historic environment and which merit consideration in planning decisions. It then distinguishes between heritage assets which are not designated, and 'designated heritage assets' which, for the purposes of this statement, it is sufficient to note includes listed buildings.

- 4.6 The PPS puts much emphasis on heritage "significance". Significance is a common thread that occurs throughout the policy statement; it is of such importance that it is mentioned in every policy. PPS5 defines significance, in Annex 2, as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic."

- 4.7 The effects of any development on a heritage asset therefore need to be assessed against the four components of its heritage significance: its archaeological, architectural, artistic or historic interest.
- 4.8 The reason for identifying significance is important: not all parts of a heritage asset will necessarily be of equal significance. In some cases certain aspects or elements of a heritage asset make no contribution to, or indeed detract from, its significance. Where that is the case, a heritage asset could potentially accommodate substantial change without any resulting harm to its significance. Change is only harmful insofar as it erodes an asset's significance.
- 4.9 Development management is covered by policies HE6 to HE12. Policy HE6 of PPS5 places a duty on the local planning authority (LPA) to require an applicant to describe the significance of any heritage assets affected by a proposal. However, the same paragraph makes it clear that the level of detail should be i) proportionate to the importance of the heritage asset and ii) no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. The reason for identifying significance is important: not all heritage assets will necessarily be of equal significance.
- 4.10 Paragraph HE7.2 of policy HE7 reinforces the point that it is the "*particular nature of the significance of the heritage asset and the value that it holds for*

this and future generations" that are the key considerations when assessing the impact of a proposal on any heritage asset. This understanding of the asset's significance should then be used to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

4.11 Policy HE8 relates specifically to undesignated heritage assets, and it has two aspects, the first of which relates to the implications of an undesignated heritage asset and the second relates to the identification of these undesignated heritage assets. The definition of undesignated heritage assets in Annex 2 of the PPS makes it clear that local listing is a mechanism for identifying these. According to HE8.1, the effect of an application on the significance of an undesignated heritage asset or its setting is a material consideration in determining the application.

4.12 However, it is also clear from this policy that undesignated heritage assets are of lesser significance than designated heritage assets, and Policy HE8 does not in any way suggest that the demolition of undesignated heritage assets should be ruled out. Instead it states only that the effect of a development on the significance of undesignated assets should be a material consideration - amongst all of the other material considerations which may be relevant.

4.13 Policy HE9 applies specifically to designated heritage assets and it adds further detail to Policy HE7. Policies HE9.1 to HE9.4 refer to significance, viability, and public benefit. Perhaps most important, however, is the concepts of significance loss, and specifically the two categories of significance loss: substantial harm and, on the other hand, harm that is less than substantial.

4.14 Paragraph HE9.2 deals with substantial harm to, equating to the total loss, or near-total loss of the significance of a designated heritage asset. This part of PPS5 is not relevant to this statement because the nature and type of development proposed would not result in the substantial loss of significance of the listed buildings, or designated heritage assets.

4.15 Paragraph HE9.4 deals with less than substantial harm to the significance of a designated heritage asset. According to this paragraph any such harm needs to be proportionately balanced against the benefits of the proposal. That is to

say where there is harm, the justification for any potential harm should be proportionate to the degree of harm caused to the significance of the asset in question.

- 4.16 Policy HE10 deals with development affecting the setting of designated heritage assets. According to paragraph HE10.1, harm to significance arises where development would not preserve those elements of the asset's setting that make a positive contribution to, or better reveal, its significance.
- 4.17 Paragraph HE10.2 then makes it clear that where a development within its setting would positively improve the significance of an asset, the development should be treated as a public benefit.

Medway Local Plan

- 4.18 Policy BNE16 relates to the demolition of listed buildings and states that the demolition of listed buildings will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons for demolition, and that all possible methods of preserving the building have been investigated.
- 4.19 Policy BNE17 deals with alterations to listed buildings. According to this policy, alterations, extensions, conversions or changes of use affecting a Listed Building will not be permitted if they:
- i are detrimental to the architectural or historic character of the building; or
 - ii are unsympathetic in design, scale, appearance and use; or
 - iii do not retain original features and materials.
- 4.20 Policy BNE18 relates to the setting of listed buildings. According to this policy, development which would adversely affect the setting of a listed building will not be permitted.

Medway Local Development Framework - Publication Draft Core Strategy

- 4.21 Policy CS12 seeks to ensure that Medway's valuable heritage assets will be preserved and enhanced.

4.22 Policy CS33 relates to Lodge Hill and it states that, in terms of heritage, design solutions should have due regard to the military history and heritage of the site.

5.0 ASSESSMENT OF SIGNIFICANCE AND IMPACT ASSESSMENT

Assessment of significance: designated heritage assets and buildings under listing review

WWI sentry posts

- 5.1 The list description identifies the following three key factors as part of the significance of the WWI sentry posts:
- i Early date: relatively few examples are known from the First World War and so the sentry posts are rare survivals in the national context.
 - ii Rarity: an example of sentry post design which is believed to be unique to Royal Navy sites in the Medway area of north Kent.
 - iii Group value: the six sentry posts at Chattenden/Lodge Hill were contemporary and functionally related, and they were built broadly to the same specification to reinforce the defences of this ordnance depot militarised landscape. It is noteworthy that the sentry posts are not intervisible and that 'group value' does not imply intervisibility.
- 5.2 The settings of most of the sentry posts have changed considerably since WWI.
- 5.3 Building 67 is a sentry post that guarded the perimeter of the former magazine and it is of an outward looking nature, with the most significant aspect of its setting its relationship with the perimeter fence and the nearby sentry posts to the southwest (Buildings 198 and 200), albeit not necessarily tangibly/visual. It is this peripheral, outward looking relationship between the post and the former magazine site, along with the contextual relationships with the nearby sentry posts that best reveals its heritage significance.
- 5.4 The setting of Building 106 is presently overgrown and it is all but invisible. There is no visual relationship between it and Chattenden magazine, which it would have guarded. This does not in any way contribute to its significance – on the contrary, the existing situation obscures its significance.
- 5.5 The easily appreciable relationship between Building 127 and the entrance in the enclosure wall, as well as the roadway leading to the magazines reveal

functional and historic relationships that reinforce the significance of this sentry post.

- 5.6 Building 219 is a sentry post that would once have guarded Eastgate, which no longer exists. The setting of this sentry post has changed to such an extent that all historic relationships have been lost and its present setting no longer reveals its significance as an entrance guarding post.

The Lodge Hill Battery

- 5.7 The Lodge Hill Battery was established in 1913-14 to counter the threat of air attack to the Lodge Hill and Chattenden Magazines by German Zeppelin airships. There was a sister battery at Beacon Hill (north of Upnor). The Lodge Hill Battery was the first permanent anti aircraft installation in the British Isles and it is of considerable significance as a readable, functioning building group that represents a national stage in defences. Its design is also of interest as it also formed a small fort to allow close ground defence.
- 5.8 The setting of the battery makes a decisive contribution to its interest. This is principally derived from the intactness of the group and the appreciable interrelationships between the buildings and the gun placements – the interest of the battery is heightened by its survival as a coherent and complete battery ensemble. It is at close quarters that the significance of these WWI structures is best appreciated. However, the location of the battery is furthermore an important aspect of its setting, including the way in which its strategic location can be appreciated, i.e. it is sited on a hilltop, in close proximity to the River Thames and the River Medway, but also its proximity to an ammunition source and manpower.
- 5.9 It is not difficult to see that the contents of the views from the Lodge Hill Battery have changed considerably since the early 20th century. However, it is also plain to see that the modern developments that can be seen in the views do not have a particular influence on the significance of the views. Instead it is the fact that the strategic positioning of the battery - which allows these far reaching, panoramic views – that is most important.

WWII pillboxes

5.10 The significance of the WWII pillboxes can be summarised as arising from:

- i Their group value: they form a coherent and intact group that can to an extent be appreciated.
- ii Their dual functionality - defence of magazine enclosures and as part of the national Stop Line.
- iii Their placement and use of topography and/or woodland.
- iv The combination of three types within the group (i.e. Types 24, 25 and 28).
- v The site specific variation of form in response to location or specific function.
- vi Their association with listed examples on same GHQ stop line (Hoo St Werburgh).

5.11 The loss of the former excavated tank ditches and the localised blockings, alterations or missing parts minimally diminish their originality, setting and interest. It is difficult to appreciate the pillboxes as a strong group, although visual connections exist between some of them. However, the use of topography and woodland is a strong, tangible reminder of the function and these aspects of their settings reveal their significance. Likewise, where it exists, relationships between pillboxes and site boundaries, roads and fences. The fact that the interrelationships between the pillboxes is in most cases difficult to appreciate (not least because of no/limited intervisibility, coupled with the distances between pillboxes) in most cases limit the way in which their surroundings contribute to their significance.

Assessment of significance: undesignated heritage assets

5.12 The significance of the undesignated heritage assets is summarised below in terms of the 7 different categories of structures.

Chattenden Magazines

5.13 The former bulk powder storage depots form the original magazine facility and they are accordingly of historic interest. The interiors have been altered through the loss of some features (e.g. gantries) and subdivision, but the barrel vaulted

brick ceilings and evidence of former travelling crane rails remain. Together with their external form, these reveal something of the buildings' original function and add to their interest. The 5 magazines form a group.

Chattenden Magazine Compound Wall

- 5.14 The wall represents part of the original magazine facility and it is of some interest in defining and enclosing the original Chattenden Magazine; this interest is principally historic and the wall has group value with the original magazines and their traverses.

Disarticulated WWII pillbox

- 5.15 The pillbox element has been turned over and its base has not been located. It is without its context and now almost unrecognisable as a pillbox. It is of very limited historic interest.

Magazine ancillary structures

- 5.16 These ancillary structures are of limited architectural interest and they are not characteristic physical manifestations of the site's original use in the same way that the magazines are. They are principally of interest by association with the magazines mainly because of their historic functional associations with the magazines. Their interest is therefore almost entirely dependent on, or borrowed from, the magazines; accordingly, these heritage assets are principally of group value with the magazines.

Later added magazine buildings

- 5.17 These magazines do not form part of the original magazine facilities and their historic interest is more limited than the original Chattenden magazines. Architecturally the buildings tend to be shed-like structures that are of very limited interest, being comparable to innumerable railway sheds and siding buildings. The large doorways, residual track elements and gantries reveal something of the buildings' former use, but this does not substantially heighten their interest.

19th Century infrastructure or accommodation buildings

5.18 The 19th century infrastructure and accommodation buildings tend to be reasonably well constructed, with traditional architectural detailing and forms for the period. They are principally of architectural interest (albeit as rather modest buildings of commonplace late Victorian detailing), but they also have a degree of significance because of their historic interest in the local context as part of the early development of the military complex.

WWII air raid shelters

5.19 The WWII air raid shelters are of common form and construction. They form part of the WWII phase of development of the military complex and are of historic interest in demonstrating the response to the threat of bombing. However, these are not unique; WWII air raid shelters are commonplace both at civilian and military installations. At most, the shelters have a low level of historic interest.

Impact assessment: designated heritage assets

5.20 None of the designated heritage assets would be demolished as part of the proposed development. The form, layout, detail and character of the buildings of the proposed development are all beyond the scope of the outline application parameters. These would be subject to controls as part of a detailed application, but they can be critical in terms of the effect of the development, especially with respect to the setting of heritage assets such as listed buildings. Without fixed building heights, layouts, materials and forms it is only possible to assess impacts in very broad terms.

5.21 'Worst case scenario' assumptions have been made with regards to impacts on the settings of the designated heritage assets. The impact assessment presented here is therefore inherently skewed towards an over-estimate of negative impacts, but that is a factor of the broad nature of the outline application, rather than an anticipated or predicted outcome. Conversely the provision of interpretation panels and a maintenance regime for these have been assumed, even though that falls beyond the outline application.

5.22 Development within the settings of these buildings would be subject to the normal planning controls, which would give the local planning authority the

opportunity to ensure that any development potentially affecting these is designed in a sensitive and appropriate way.

WWI sentry posts

- 5.23 The visual and spatial relationships between the sentry posts and the particular areas that they would have guarded (such as entry points), where these have survived, have been considered.
- 5.24 In terms of Building 67, it can be assumed that the present open northern hinterland, to both the east and west, would be substantially changed by the proposed development. The context of the sentry post will change considerably; it will no longer be experienced in an undeveloped setting. However, it is relevant that the sentry post guarded the perimeter of the former magazine and it is of an outward looking nature, with the most significant aspect of its setting its relationship with the perimeter fence and the nearby sentry posts to the southwest (Buildings 198 and 200), albeit not necessarily tangibly/visual.
- 5.25 The contextual relationships and heritage significance of the sentry post could also be better revealed by means of a maintenance regime/restoration and an interpretation panel to set out its significance and contextual relationships with other sentry posts and the wider military legacy of the site. A heritage trail to connect key aspects of the site could further enhance the relationships between the heritage assets.
- 5.26 A low level loss of significance can be ascribed because of the proximity of the built envelope of the proposed development to the sentry post, and the degree to which its open setting and contextual relations with the former munitions magazine might be compromised. However, this could be balanced against improving and better revealing its significant contextual relationships, as well as the potential to secure its physical fabric and long term future through the implementation of a maintenance regime.
- 5.27 Similar benefits can be implemented at Building 106, and in any event the likely removal of overgrowth that presently almost entirely obscures the sentry post would substantially improve its significance by revealing contextual associations with the road and Chattenden Magazine.

- 5.28 A 'worst case' scenario assumes the demolition of all undesignated heritage assets, which would include the Chattenden Magazine compound wall and the magazines themselves, which would affect the easily appreciable relationships between Building 127 and important parts of its context, which serve to reinforce the heritage significance of the sentry post. Removal of these elements would likely result in such a change to the context of the sentry post that it would be difficult to visualise its present context. This would result in a negative impact despite the potential for the improvements as noted above.
- 5.29 The same is not the case with the easternmost of the sentry posts, which has lost its contextual relationships with the former Eastgate. The present setting of the sentry post reveals very little of its significance and the potential for the aforementioned improvements is likely to result in a net benefit to the significance of this sentry post.

The Lodge Hill Battery

- 5.30 The Lodge Hill Battery is identified within the proposed development as a beacon project. As such there is scope for future proposals to preserve, enhance or better reveal its significance, whether through restoration or a programme of maintenance, for example. The nature of such proposals is dependent upon the type of designation (i.e. scheduling and listing would have different implications in terms of restoration) and therefore also the assessment of the benefits and appropriateness of detailed proposals.
- 5.31 However, the setting of the Lodge Hill Battery has been regarded as particularly sensitive in terms of an appreciation of its ridge location and the panoramic views it affords in most directions, which were integral to the functioning of the battery. The strategic ridge location of the battery and the panoramic views from it would remain instantly appreciable. An interpretation panel could help to reveal part of the significance of the battery that is presently very difficult to appreciate by lay persons, as well as revealing contextual relationships with the remainder of the site. A maintenance regime and potential restoration or stabilisation programme would secure the long term future of the group, and the potential for increased accessibility is in accordance with the government's objectives for the historic environment. As such the proposed development has the potential to result in significant benefits to this group of heritage assets.

WWII pillboxes

- 5.32 The World War II pillboxes, for which a designation decision is pending, are for the most part peripheral to the site and their settings would remain largely unaffected as a consequence of the proposed development. These structures form part of a wider regional and national context as well as relating at a local level to the military uses at the Site. Detailed proposals for their retention, use, maintenance, meaningful integration within development or adaptation, can follow designation decisions, and the indicative masterplan demonstrates that this is possible.
- 5.33 The only pillboxes that could be impacted on by development within their settings is the loosely spaced 'group' of Buildings 18-21. Their present open setting, with views over the site and of other pillboxes, is likely to be substantially changed. It is likely that the loss of these contextual relationships will be such that there will be a loss of heritage significance. However, the contextual relationships and heritage significance of the pillboxes could be better revealed by means of a maintenance regime/restoration and interpretation panels. Key sight lines (over the Site and in the direction of the adjoining pillboxes) could also be maintained. On the whole a low level loss of significance can be ascribed.

Impact assessment: undesignated heritage assets

- 5.34 As the precise details are not yet known, the outline application assumes a 'worst case' scenario in which all of the undesignated heritage assets would be demolished. Detailed applications would be subject to the normal planning controls and such a scenario is highly unlikely. It is intended to retain examples of some of the existing undesignated heritage assets on the site, although it has not been possible to definitively indicate which of these would be retained at this stage.
- 5.35 A resulting total loss of significance of all of these structures has been assumed. However, it is relevant that some of the structures have serious structural failings that would rule out their retention in any event. In particular, the Chattenden magazines have had to be reinforced to protect them against land slippage, and this is likely to remain a problem that could prevent the long term retention of the buildings on this part of the site in any event (there are also

examples of numerous other buildings which have outlived their lifespan or which are structurally compromised).

- 5.36 It is also relevant that many of the buildings categorised as heritage assets are utilitarian structures that are unexceptional in terms of their design, and the wider benefits of retaining these are highly questionable.
- 5.37 The WWII air raid shelters also present unique problems in terms of their retention and the proportionate heritage value/benefit. These structures are also of repeated form and design, and the retention of one or more of the best examples of this type could be used for educational purposes and that would sufficiently preserve their collective heritage value as part of the site's military legacy.
- 5.38 However, there would nevertheless be practical issues regarding their ownership, long-term maintenance and potential liability claims resulting from unauthorised access to them - as subsurface structures they are presently flooded and this type of structure would be a likely target for unauthorised access. They are prone to flooding and accessibility could be further hampered by the structural integrity and future lifespan of their roof structures (bearing in mind these were constructed as temporary structures that have by far outlived their intended lifespan). Such considerations would limit the amount of air raid shelters that could practically be retained.

Summary

- 5.39 It is clear that the proposed development would result in benefits, or heritage gains, as well as the inevitable loss of heritage significance. PPS5 makes it clear that these losses and gains not only need to be weighed against each other in terms of heritage, but also the wider planning benefits of the proposed development (a concept that the draft National Planning Policy Framework reinforces even more strongly).

6.0 SUMMARY AND CONCLUSIONS

- 6.1 There are 4 grade II listed buildings on the site, all of which are WWI sentry posts. These are the only designated heritage assets, although another 20 structures within the site are presently still under review for listing and all of these have been treated as listed buildings (designated heritage assets) for the purposes of the assessment. These can be categorised into two groups: the 5 WWI buildings/structures of the Lodge Hill anti-aircraft battery, and 15 WWII pillboxes (there are 5 types).
- 6.2 The majority of the pillboxes lie at the periphery of the site, or in woodland (or both). These are 'outward looking', i.e. they face the land outside of the site, rather than the site itself, and they are not readily intervisible with each other. The exceptions are a group of four pillboxes along the east of the Lodge Hill Training Area, which face towards the Lodge Hill Training Area and there is intervisibility between each pillbox. Another pillbox guarded Lodge Hill Lane.
- 6.3 There are no locally listed buildings on the site, although a further 41 structures that can be considered to be undesignated heritage assets and they have been included in the assessment. These fall into 7 categories:
- i 5 Magazines that form part of the original Chattenden Magazine;
 - ii the Chattenden Magazine Compound Wall;
 - iii a disarticulated WWII pillbox;
 - iv 5 magazine ancillary structures;
 - v 14 magazine buildings that form part of the expansion of the original Chattenden Magazine;
 - vi 6 19th century infrastructure or accommodation buildings that form part of the expansion of the original Chattenden Magazine; and
 - vii 9 WWII air raid shelters.

6.4 Prior to the 19th century the site comprised a mix of woodland, farmland and pasture on the valley slopes and floor. The historic development of the site can be summarised as seven successive phases of development, each of which have affected the character of the area. These are:

- i Phase I - 1873-1898: the establishment of the original Chattenden Magazine and Barracks;
- ii Phase II - 1899-1912: munitions storage expansion and the introduction of munitions manufacturing;
- iii Phase III - 1913-1917: World War I strategic defence additions;
- iv Phase IV - 1918-1937: inter-war development;
- v Phase V - 1938-1945: the Second World War;
- vi Phase VI - 1946-1960: the demise of manufacturing and munitions storage and the introduction of training; and
- vii Phase VII - 1961-2011: training.

6.5 The site comprises five different character or core areas. These area:

- i Chattenden Barracks;
- ii Chattenden Magazine Enclosure;
- iii Lodge Hill Camp;
- iv Lodge Hill Training Area (formerly Magazine Enclosure); and
- v Lodge Hill and Perimeter (north and eastern land parcels).

6.6 The settings of most of the sentry posts have changed considerably since WWI and the contributions of their settings to their significance differ considerably. Building 67 is an outward looking sentry post, and the setting of Building 106 is presently overgrown, such that it is all but invisible. There are easily appreciable relationships between Building 127, a sentry post at the entrance in the Chattenden Magazine enclosure wall, and the roadway leading to the magazines. These reveal functional and historic relationships that reinforce the significance of the sentry post.

- 6.7 The setting of the eastern sentry post (Building 219) has changed to such an extent that all historic relationships have been lost and its present setting no longer reveals its significance as an entrance guarding post.
- 6.8 The setting of the Lodge Hill Battery makes an important contribution to the interest of the group. The significance of these WWI structures and the interrelationships between the buildings are best appreciated at close quarters. The location of the battery is furthermore an important aspect of its setting, including the way in which its strategic location can be appreciated. The strategic positioning of the battery, which allows far reaching, panoramic views is the most important aspect in terms of outward views, rather than the specific contents of these views.
- 6.9 It is difficult to appreciate the WWII pillboxes as a strong group, although visual connections exist between some of them. Where it exists, visual relationships between pillboxes and site boundaries, roads and fences are important. However, the fact that the interrelationships between the pillboxes is in most cases difficult to appreciate limit the way in which their surroundings contribute to their significance.
- 6.10 The form, layout, detail and character of the buildings of the proposed development are beyond the scope of the outline application parameters. Without fixed building heights, layouts, materials and forms it is only possible to assess impacts on the settings of the retained buildings in very broad terms.
- 6.11 At Building 67, a low level loss of significance can be ascribed because of the proximity of the built envelope of the proposed development to the sentry post, and the degree to which its open setting and contextual relations with the former munitions magazine might be compromised. This could be balanced against improving and better revealing its significant contextual relationships, as well as the potential to secure its physical fabric and long term future through the implementation of a maintenance regime.
- 6.12 Similar benefits can be implemented at Building 106, and in any event the likely removal of overgrowth that presently almost entirely obscures the

sentry post would substantially improve its significance by revealing contextual associations with the road and Chattenden Magazine.

- 6.13 Removal of the Chattenden Magazine compound wall and the magazines themselves would affect the easily appreciable relationships between Building 127 and important parts of its context and result in a negative impact, despite the potential for improvements.
- 6.14 The present setting of the former Eastgate sentry post (Building 219) reveals very little of its significance and the potential for the aforementioned improvements is likely to result in a net benefit to the significance of this sentry post.
- 6.15 The setting of the Lodge Hill Battery, in particular in terms of an appreciation of its ridge location and the panoramic views it affords in most directions, would not be harmed by the proposed development. There is scope for future proposals to preserve, enhance or better reveal its significance of the Lodge Hill Battery. The nature of such proposals is dependent upon the type of designation, but the proposed development has the potential to result in significant benefits to this group of heritage assets.
- 6.16 The World War II pillboxes are for the most part peripheral to the site and their settings would remain largely unaffected as a consequence of the proposed development. The only pillboxes that could be impacted on by development within their settings is the loosely spaced 'group' of Buildings 18-21. Their present open setting, with views over the site and of other pillboxes, is likely to be substantially changed.
- 6.17 It is likely that the loss of these contextual relationships will be such that there will be a loss of heritage significance. However, the contextual relationships and heritage significance of the pillboxes could be better revealed by means of a maintenance regime/restoration and interpretation panels. Key sight lines (over the Site and in the direction of the adjoining pillboxes) could also be maintained. On the whole a low level loss of significance can be ascribed.

- 6.18 As the precise details are not yet known, the outline application assumes a 'worst case' scenario in which all of the undesignated heritage assets would be demolished, although in practice such a scenario is highly unlikely and it is intended to retain examples of some of these.
- 6.19 There are also structural, design and other practical considerations that would limit the extent to which these structures could, in any event, be retained.
- 6.20 It is clear that the proposed development would result in benefits, or heritage gains, as well as the loss of heritage significance. The losses and gains in terms of heritage significance need to be weighed against each other, but also against the wider planning benefits of the proposed development.
- 6.21 It is anticipated that the details of the proposed development, to be pursued through Reserved Matters, will need to broadly accord with the indicative masterplan – which draws substantially on historic patterns and military landscape features. This would ensure that the historic land use patterns and the military landscape would be reflected in the new development. Heritage trails, the use of heritage assets for educational purposes and site-specific installations, such as 'information panels' can help to contextualise the history, heritage significance and development of the site in an accessible way.
- 6.22 A comprehensive, pre-development site-wide record of the buildings, key spaces and areas is also anticipated (this is normally secured by condition). The record would be a valuable part of the site's legacy and it could also be used to inform future residents and communities of the historic origins, significance and evolution of the site. For instance, the information generated could be used by schools, on interpretation panels or as part of information boards along heritage trails.
- 6.23 In this way the historic legacy of the site can be made accessible to the general public, alongside the physical manifestation of the military landscape and historic land use patterns in the proposed development.