

FINAL

A) OUTLINE APPLICATION FOR THE DEVELOPMENT OF UP TO 145 RESIDENTIAL DWELLINGS (50% AFFORDABLE) INCLUDING THE CREATION OF ACCESS POINTS FROM APPLEDORE ROAD (1 X ALL MODES AND 1 X EMERGENCY, PEDESTRIAN AND CYCLE ONLY), AND WOODCHURCH ROAD (PEDESTRIAN AND CYCLE ONLY), AND CREATION OF A NETWORK OF ROADS, FOOTWAYS, AND CYCLEWAYS THROUGH THE SITE. PROVISION OF OPEN SPACE INCLUDING CHILDREN'S PLAY AREAS, COMMUNITY ORCHARDS, SUSTAINABLE URBAN DRAINAGE SYSTEMS, LANDSCAPE BUFFERS AND GREEN LINKS ALL ON 12.35 HA OF THE SITE. (SAVE FOR ACCESS, MATTERS OF APPEARANCE, LANDSCAPING, LAYOUT & SCALE RESERVED FOR CONSIDERATION') B) FULL PLANNING PERMISSION FOR THE CHANGE OF LAND USE FROM AGRICULTURAL LAND TO LAND TO BE USED AS A COUNTRY PARK (8.66 HA), AND LAND TO BE USED AS FORMAL SPORTS PITCHES (3.33 HA), TOGETHER WITH PAVILION TO SERVE THE PROPOSAL AND THE SURROUNDING AREA. INCLUDING ACCESSES, ANCILLARY PARKING, PATHWAYS, SUSTAINABLE URBAN DRAINAGE SYSTEMS AND ASSOCIATED LANDSCAPING.

LAND BETWEEN APPLEDORE ROAD AND WOODCHURCH ROAD, TENTERDEN, KENT

PROOF OF EVIDENCE ON HERITAGE

ON BEHALF OF WATES DEVELOPMENTS LTD

PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990

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1. AUTHOR'S STATEMENT

- 1.1 The evidence which I have prepared and provided for this appeal in this Proof of Evidence is true and has been prepared and given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true professional opinions.
- 1.2 Full details of my qualifications and experience are given at Appendix 1.

2. INTRODUCTION

- 2.1 This Heritage Proof of Evidence has been prepared following the refusal of Ashford Borough Council to grant planning permission for:
 - a) *Outline application for the development of up to 145 residential dwellings (50% affordable) including the creation of access points from Appledore Road (1 x all modes and 1 x emergency, pedestrian and cycle only), and Woodchurch Road (pedestrian and cycle only), and creation of a network of roads, footways, and cycleways through the site. Provision of open space including children's play areas, community orchards, sustainable urban drainage systems, landscape buffers and green links all on 12.35 ha of the site. (Save for access, matters of appearance, landscaping, layout & scale reserved for consideration')*
 - b) *Full planning permission for the change of land use from agricultural land to land to be used as a country park (8.66 ha), and land to be used as formal sports pitches (3.33 ha), together with pavilion to serve the proposal and the surrounding area. Including accesses, ancillary parking, pathways, sustainable urban drainage systems and associated landscaping.*
- 2.2 Planning Application No. 21/00790/AS was submitted to Ashford Borough Council on 30th April 2021.
- 2.3 The planning application was accompanied by a Heritage Statement produced by Pegasus Group (April 2021). The Heritage Statement concluded that the proposed development would cause no harm to the significance of any built heritage assets.

- 2.4 Matters relating to Archaeology and Historic Landscapes were covered in separate statements produced by RPS.

Consultation

- 2.5 A Consultation response from Ms Wendy Rogers, Senior Archaeological Officer in Heritage Conservation made no objection to the proposed scheme on the basis of heritage matters.

Third Parties

- 2.6 With regards to built heritage, Stace House and Dovendon Listed buildings are mentioned in an objection letter from a third party (Mr Albert Poole, undated), but no harm is asserted. 13-15 Appledore Road is also mentioned in Mr Poole's objection and the response from Tenterden Town Council (referred to as Limes Land Farmhouse).

- 2.7 With regards to archaeology and historic landscape matters, objections were received from Tenterden Town Council, Mr Albert Poole, and Mrs Samantha Reed on behalf of the Limes Land Protection Group. These mainly related to the location of the site of the gallows in the vicinity, as well as historic landscape features.

Officer's Report

- 2.8 The Officer's Report to committee states with regards to the Conservation Area:

"I consider that harm to the setting of the conservation area would be difficult to demonstrate in practice."

- 2.9 With regards to the Listed buildings in the vicinity of the site, the report states:

"Stace House is the nearest listed building and occupies a prominent position at the built crossroad adjoining the southwest corner of the site. The development would be set back behind hedgerows and some trees and due to the separation distances I consider that it is unlikely to result in significant harm to the setting of this listed building. The same would apply to Craythorne House located on the opposite side of the Woodchurch Road."

- 2.10 As such, no harm to built heritage assets was identified.

- 2.11 With regards to archaeology and historic landscape matters, the Officer's report concluded '*based on advice from KCC Heritage that subject to the imposition of relevant conditions and/ or section 106 obligation agreement that there is no objection to the scheme on archaeological grounds.*'
- 2.12 As such, no harm to archaeology or historic landscape elements was identified.

Reason for Refusal

- 2.13 The application was refused, with the Decision Notice dated 27th September 2021. Matters relating to built heritage, archaeology and historic landscape were not the basis of any reasons for refusal.

3. KEY ISSUES

3.1 The key issues are considered to be the following:

- Does the Appeal Site contribute to the heritage significance of the Tenterden Conservation Area through character, appearance, and/or setting?
- Does the Appeal Site contribute to the heritage significance of any nearby Listed buildings through setting, namely the Grade I Listed Church of St Mildred, the Grade II Stace House, Grade II Listed Craythorne and Grade II Listed Dovenden?
- Does the Appeal Site contribute to the unlisted 13-15 Appledore Road?
- Will the significance of any of these heritage assets be harmed by the proposed development?
- Will the proposed development cause any harm to any archaeological or historic landscape elements?

3.2 The site and its development are first described, followed by a discussion of the Church and Conservation Area, then the Grade II Listed Craythorne, Stace House, and Dovenden, and then the non-designated 13-15 Appledore Road.

3.3 It should be noted at the outset that the assets considered in this assessment, the Listed buildings and Conservation Area, have been resilient to change that has previously occurred in the area throughout their history, including the implementation of the Tent1 scheme.

3.4 Matters relating to archaeology and historic landscape are considered by Mr Duncan Hawkins, in a Statement included at Appendix 2. A summary of these matters is given in my Section 12.

4. LEGISLATION AND PLANNING POLICY

- 4.1 The legislation and planning policies are considered relevant to this proposal is given in Appendix 3.

5. METHODOLOGY

- 5.1 A full methodology is given in Appendix 4.

6. SITE DESCRIPTION AND DEVELOPMENT

- 6.1 The application site is located on the eastern edge of Tenterden and covers approximately 24.34 ha. It comprises 14 parcels of predominantly agricultural land, generally demarcated by gappy hedgerows and trees (Plates 1-3).



Plate 1 Looking north-west across the western area of the site



Plate 2 Looking south-east across the western side of the site



Plate 3 Looking south-east across the eastern side of the site

- 6.2 With the exception of a very small part of the south-western extent of the site which extends into the Tenterden Conservation Area, no nationally or locally designated heritage assets are present within the site.

Site Development

- 6.3 Historic map regressions have been prepared for the site as part of an Archaeological Desk Based Assessment (DBA), and Historic Landscape Assessment (RPS 2021 and CgMs 2021). A full description of the development of the site with regards to historic landscape and archaeology is given in Mr Hawkins' Statement at Appendix 2. The salient points regarding the historic development of the site in relation to built heritage matters can be summarised as below.
- 6.4 Andrews and Drury's map of 1769 records the site as undeveloped land beyond the East Gate of Tenterden. An area within the eastern part of the site may have possessed a heathland character at that time.
- 6.5 John Adam's map of 1822 indicates that the site had been partitioned into several parcels of agricultural land and sparsely interspersed with pits or ponds, which may be indicative of post-medieval mining activity.
- 6.6 The 1843 tithe map for the parish of Tenterden records that most of the site was used for pasture. The vast majority of the site was then owned and occupied by Elizabeth Manclarke, with only two of the southernmost parcels being in separate ownership and tenancy (being owned by Sir Edward Hales and occupied by William Daw).
- 6.7 The First Edition (1870) Ordnance Survey records some new built development within the westernmost part of the site, with these new buildings perhaps corresponding with former agricultural buildings. The remainder of the site evidently remained in agricultural use, with a labelled 'sheepfold' being indicative of the continued at least partial pastoral use of the site.
- 6.8 Subsequent maps and aerial photographs illustrate no notable changes, with only minor changes to field boundaries. One of the southernmost parcels of the site is currently used as a playing field.

7. THE CHURCH OF ST MILDRED AND THE TENTERDEN CONSERVATION AREA

- 7.1 St Mildred's Church and the Tenterden Conservation Area are here considered due to their relationship in views from the site.
- 7.2 The current limits of the Tenterden Conservation Area were designated on 10th October 1996. A Conservation Area was first designated in Tenterden in 1974, and the boundaries of this were altered in 1977.
- 7.3 A Conservation Area Assessment for Tenterden was prepared in 1995, following which the Conservation Area was amended to cover the currently designated area. The Assessment was published in 1997; however, this is no longer publicly available and is considered by Ashford Borough Council to be out-of-date. Consequently, there is currently no adopted Conservation Area Appraisal or Management Plan that informs planning decisions in Tenterden.
- 7.4 The Heritage Strategy adopted by Ashford Borough Council in October 2017 contains a brief summary of the historic development of Tenterden as follows:

"Tenterden the second settlement of the borough, has a rich and distinctive historic heritage in its own right. The town first rose to prominence as a centre for the wool trade in the 13th Century. The town, unlike other wool centres in the Weald, had the advantage of access to the sea as much of what is now Romney Marsh was then open water. Ships could be beached at Smallhythe (the -hythe suffix means 'port'), on the southern edge of the town. Initially established to transport timber out of the Weald, wood was subsequently increasingly used to construct ships. Between 1416 and 1420 Henry V's balinge the George was built at Smallhythe, at the highpoint of this industry there. In 1449 Tenterden was incorporated into the Confederation of Cinque Ports as a limb of Rye.

As a Cinque Port, Tenterden enjoyed virtual self-government, was exempt from national taxation and represented at the coronation of the monarch. By the mid 16th Century however, the waterways of the Romney Marsh silted up and resultant changes in the coastline meant that Tenterden lost all access to the sea, so that today it is some ten miles from the coast although it remains a member of the Cinque Ports. The town continued to prosper however and by the 18th century, access to the rich grazing lands of the marsh and the cultivation of fruit

and hops on surrounding higher land continued to bring wealth to the town which became established as an important market and service centre."

- 7.5 The historical development of Tenterden is further described within an Archaeological Assessment of the town undertaken as part of the Kent Historic Towns Survey in 2004.
- 7.6 Tenterden is located at the eastern edge of the Kent High Weald on a plateau of high ground. Ashford is located c. 15km (10 miles) to the north-east; Hastings c. 25km (15 miles) to the south; Maidstone c. 25km to the north; and Royal Tunbridge Wells c. 30km (20 miles) to the north-west.
- 7.7 The Conservation Area boundary covers the historic settlement core of Tenterden along with expansive areas of green space to the south and south-west, which appears to predominantly comprise the grounds of three large residences: Plummer, Heronden and Morghew. Other areas of green space characterise the northern and south-eastern boundaries of the Conservation Area, which comprise agricultural land, and the Recreation Ground and grounds of Hales Place, respectively.
- 7.8 The core of the settlement has a long, linear arrangement, centred on the parish church and the old market place, with vestiges of burgage tenement plots fronting onto the High Street (Plates 4 and 5), below.



Plate 4 Looking north-east to the High Street and the parish church

- 7.9 Tenterden can be approached from all directions by road. The A28 is the main thoroughfare which passes through the town on a roughly north-east to south-west axis and connects Tenterden to Ashford and Hastings.
- 7.10 There are also multiple approaches by foot, including via public rights of way. The main public right of way is the High Weald Landscape Trail which provides approaches from the south-east and south-west.
- 7.11 There was historically a railway approach to Tenterden via the train station located within the northern boundary of the Conservation Area. This now functions as part of the Kent and East Sussex Heritage Railway.
- 7.12 There has been no systematic study of key views towards, from or within the Tenterden Conservation Area. Based on an independent survey, it is clear that the most important are the sequential views along the High Street, which include key tableaux of the historic townscape and most of the Listed buildings within the designation area (Plate 4, above, Plate 5, below).



Plate 5 Looking south-west along High Street

- 7.13 Most buildings within the historic core of Tenterden are variably faced in brick, rendered and painted, or clad with hanging tiles, with roofs being overwhelmingly covered in plain clay tiles. There are also important examples of timber frame, weatherboarded, and stone structures, the most notable of the latter being the parish church of St Mildred (Plate 6).



Plate 6 Looking north-west to the Tower of St Mildred's from High Street

- 7.14 St Mildred's Church, which lies in the historic core of Tenterden, north of the High Street, is a Grade I Listed building and as such is a designated heritage asset of the highest level of significance, as defined by the NPPF.
- 7.15 The church dates to the 14th and 15th. It is mainly constructed with an exterior of stone rubble and has a crenelated tower of Bethersden marble, with four pinnacles. The interior has a 19th-century wooden vaulted ceiling.
- 7.16 The church lies within a churchyard (Plate 7) which is itself enclosed by built form on three sides, with fields lying to the north.



Plate 7 Looking north-west to the church from the edge of the churchyard

- 7.17 The most important views to the Church of St Mildreds are those possible from the churchyard and immediate vicinity, and wider historic core of Tenterden (Plates 4, 6 and 7, above).
- 7.18 Many views of St Mildreds are possible from the wider vicinity, beyond the settlement.
- 7.19 Key wider views are from footpaths to the north of the Church, from where the architectural detail of the tower can be appreciated, and the asset can be seen in conjunction with the historic core of the town, the station and nearby agricultural land (Plate 8).



Plate 8 Looking south-east towards St Mildreds from footpath AB16

- 7.20 Also, in views south and south-east from footpaths AB16, AB17 and AB18, the topographic situation of the church and historic core can be appreciated (Plates 9 to 11).



Plate 9 Looking south-east towards St Mildreds church from further north on footpath AB16



Plate 10 Looking south-east to the Church of St Mildred from the footpath AB17



Plate 11 Looking south-east to the Church of St Mildred from the footpath AB18

7.21 These are key views to the church and Conservation Area, from where the topographic situation of the settlement can be understood.

Statement of significance

7.22 Based on the independent survey of Tenterden and relevant desk-based research, it is clear that the special character and appearance, and hence the heritage significance, of the Conservation Area is principally derived from the following elements:

- The long, linear arrangement of the town core, which is of historic interest in illustrating the medieval layout of the settlement;
- The numerous Listed buildings located within the designation boundary which contribute to the historic, archaeological, architectural and artistic interest of the Conservation Area, as well as possessing intrinsic heritage significance;
- The use of vernacular buildings materials and techniques, including brickwork, timber-framing, weatherboarding, and tiling, which contribute to the historic, architectural and artistic interest of the Conservation Area;
- Recorded archaeological remains and deposits within the designation area, which principally illustrate the medieval and post-medieval development of the Conservation Area and contribute to its archaeological and historic interest; and
- Key areas of green space within the Conservation Area, which include parcels of agricultural land, parkland, domestic grounds and gardens, and modern recreational facilities.

7.23 The heritage significance of the asset is very largely derived from the buildings and spaces within the area, but setting does make a lesser contribution.

7.24 There is no statutory protection for the settings of Conservation Areas, and it is clear that elements of the surrounds, or 'setting', of the Tenterden Conservation Area have been included within the designation boundary, such as the parkland

and domestic grounds to the west and south-west, and agricultural land to the north.

- 7.25 The wider elements of the rural landscape across which there are views to the historic core of the Conservation Area, which illustrate its historic topographic context, can be considered to make a contribution to the heritage significance of the asset through setting. Views from the wider area to the Church of St Mildred are discussed below.
- 7.26 With regards to the Church of St Mildred, the heritage significance of the church is largely embodied in its physical form, but setting does make a lesser contribution to its significance. The elements of its setting that make the greatest contribution to its significance are the historic town it served and its churchyard, with which it had and has a functional relationship. These are also the areas from where the best views of the asset are possible, from where the architectural and artistic significance of the asset can be best appreciated and understood.
- 7.27 Some wider views to the church make a smaller contribution to significance through setting. These include views from footpath AB16 to the north of the church from where the architectural detail of the church and its location within the historic core of the settlement can be appreciated (Plate 10, above), and views from footpaths AB16, AB17 and AB18 from where the topographic situation of the church can be understood.
- 7.28 Other views to the church from the wider area make no particular contribution to the heritage significance of the asset, but rather are among the large number of views to the asset from the wider vicinity.

Any contribution of the site

- 7.29 A c. 25m section of highway and verge along Appledore Road at the westernmost edge of the site (where the new pedestrian, cycle and emergency access to the site is proposed) lies within the Conservation Area. This contains a mature horse chestnut tree. This tree, which will be retained in the proposed scheme, positively contributes to the character and appearance of the Conservation Area.

- 7.30 The potential contribution of the site to the heritage significance of the Conservation Area and church via setting is considered below.
- 7.31 The site is undeveloped agricultural land with historic mapping suggesting that its general character has changed little since the 19th century, although there has been some minor boundary loss and the field boundaries are no longer maintained as functional boundaries, now being permeable bands of linear vegetation (Plate 12).



Plate 12 Gappy former hedge line within the site

- 7.32 When approaching the Conservation Area via Woodchurch Road and Appledore Road, the full extent of the site and its agricultural character are not visible or appreciable due to the modern residential development on the north side of Appledore Road and the south side of Woodchurch Road, and the mature trees, hedgerows, and other vegetation that characterise the edges of the site. There are some glimpses of small parts of the site from Appledore Road (Plates 13 and 14), but these are seen in the context of modern housing.



Plate 13 Glimpse of the site between houses from Appledore Road (taken from beyond the Conservation Area)



Plate 14 Glimpse into the site from Appledore Road (taken on the edge of the Conservation Area)

- 7.33 Appledore Road and Woodchurch Road are B-roads which do not constitute primary approaches to the Conservation Area. As gateways to the asset, they have overwhelmingly modern, leafy, residential characters, and make no particular contribution to the understanding or appreciation of Tenterden's historic townscape or rural context. Additional residential development has recently taken place on land to the south of Appledore Road, opposite the proposed entrance to the application site.
- 7.34 At the edge of the Conservation Area on Appledore Road, the soft verge that lies within both the Conservation Area and the site possesses a mature tree (Plate 15). This tree is part of an avenue of trees which partially survives along Appledore Road, straddling the edge of the Conservation Area.
- 7.35 Immediately behind tree, within the site but outside the Conservation Area, is a low hedge and gravelled trackway, and further trees and vegetation which screen views into the main body of the site.



Plate 15 The tree within the site that lies within the Conservation Area

- 7.36 There are distant views to the Church of St Mildred from within the site, mostly from the high ground followed by the public footpath (Plate 16).



Plate 16 Looking south-west from within the site to the tower of the Church of St Mildred



Plate 17 Looking west-south-west across the site to the tower of St Mildreds

- 7.37 The views comprise a foreground of fields, albeit the boundaries are now gappy and permeable. Beyond this is the edge of Tenterden, with the visible buildings on this edge being of modern origin. Above this line of modern built form, and above more intervening vegetation within the Conservation Area, the church tower is visible.
- 7.38 These views do not allow an appreciation of the architectural detail of the tower, nor the situation of the church within the historic core of Tenterden, nor its topographic situation.
- 7.39 As such, the site is not considered to make any specific contribution to the heritage significance of the Church and Conservation Area above facilitating distant views from this general area.
- 7.40 The peripheral glimpses of the westernmost part of the site that are possible in views along approaches to the Conservation Area between modern residences are not considered to contribute to the heritage significance of the asset through setting.

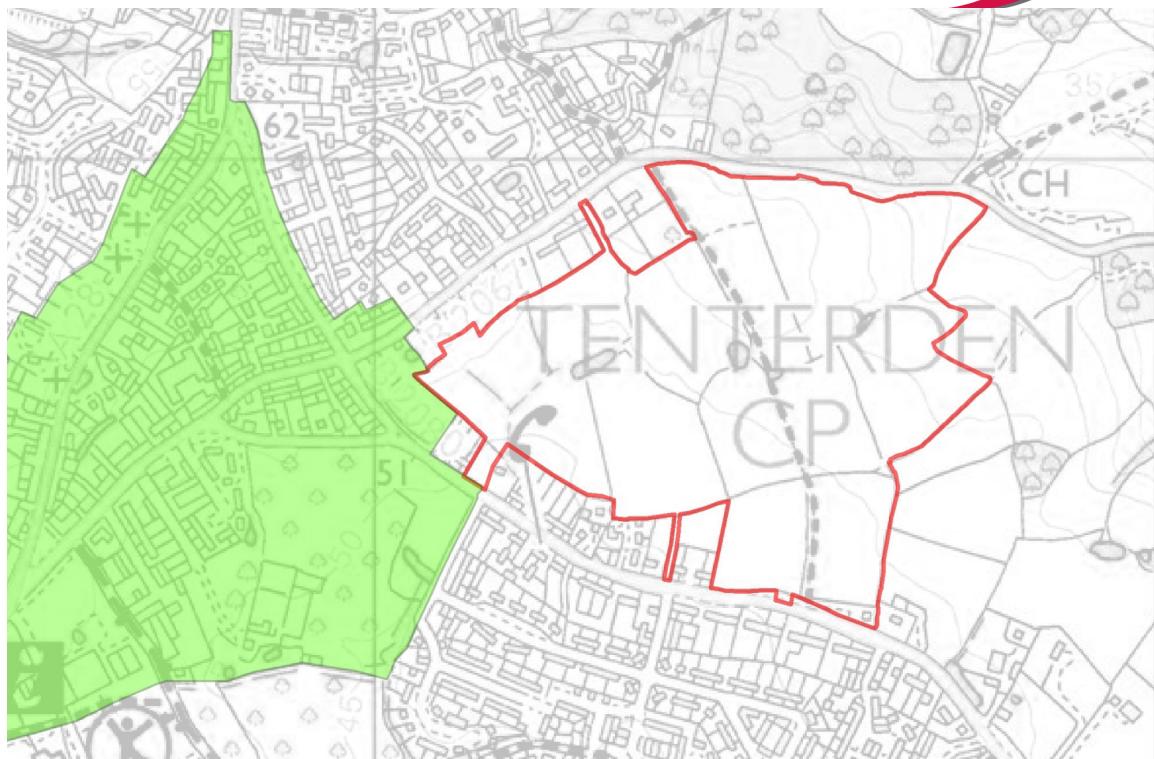


Plate 18 Map showing the site (outlined in red) in relation to the Tenterden Conservation Area (shaded green and only partially visible).

Impact assessment

- 7.41 The mature horse chestnut tree within the part of the site that lies within the Conservation Area and positively contributes to its character and appearance will be retained.
- 7.42 Minor traffic calming measures are proposed on Appledore Road, including a street narrowing feature within the Conservation Area. This has been sensitively designed, simply forming an extension of the grassed verge with the requisite signage, and is in keeping with the character and appearance of the Conservation Area.
- 7.43 Hence, the character and appearance of the Conservation Area will be preserved.
- 7.44 Consideration of the views to St Mildred's Church has been a key consideration in the design of the proposed masterplan. Three view corridors have been created to frame views of the church from the higher ground crossed by the public

footpath (See DAS Section 3.10 – Key View Photomontages, and the LVIA, Viewpoint 5, Viewpoint 9 and Viewpoint B).

- 7.45 In these views, the tower of the church will still be visible above the line of vegetation within the Conservation Area, maintaining views to the asset from this general area.
- 7.46 The change within the views and the blocking of some other views from the high ground will cause no harm to the heritage significance of the Church or the Conservation Area, as they make no particular contribution to the heritage significance of the assets, being distant views to the church from this general area which are not illustrative of its architectural detail, its topographic situation on a local high point, or its location within the historic settlement core.
- 7.47 The change of character of the site may also be glimpsed from Appledore Road on the approach to the Conservation Area and on its edge. These changes on the approach to the Conservation Area that is flanked by modern housing would cause no harm to the heritage significance of the asset through setting.
- 7.48 In summary, the proposed development would preserve the character and appearance of the land within the Conservation Area, and cause no harm to the heritage significance of the church of St Mildred and the Tenterden Conservation Area through changes in setting.

8. STACE HOUSE

- 8.1 Stace House is a Grade II Listed building that was added to the National List on 8th May 1950 (NHLE 1203636). The List Entry describes the building as follows:

"Formerly "The Limes." C18. 2 storeys and attics red brick. Hipped roof with 2 dormers and eaves cornice. 4 sashes with glazing bars intact and 1 blank. Doorcase with pilasters, pediment, rectangular fanlight and 4-panel moulded door."

- 8.2 The house is located on the south side of Woodchurch Road, at the junction with Beacon Oak Road. The principal western elevation of the house faces Beacon Oak Road but is separated from the highway by a gravelled forecourt and small garden area to the south (Plate 19). There appears to be a small, single-storey, detached garage south-west of the house. Further ancillary buildings are located to the east of the house. Of these, the north-easternmost outbuilding appears to have been alienated from Stace House and converted to residential use. The modern curtilage boundary of the Listed building is defined by brick walls, closeboard timber fencing, and vegetation.



Plate 19 Looking south-east to Stace House

- 8.3 The house appears to be shown on John Adams' map of 1822 but is most clearly recorded on the 1843 tithe map and apportionment. The tithe records a house, garden and pleasure grounds, labelled 'Eastgate', that were owned and occupied by Elizabeth Manclarke. There was a large residence known as 'Crathorne' on the opposite side of the road to the north (still extant).
- 8.4 Subsequently, the house was known as 'The Limes' and is labelled as such on the First Edition (1870) Ordnance Survey map. This map better reveals the layout of the associated gardens, which appears to have included a tree-lined walk to the south of the house and its immediate gardens and a pond to the east.
- 8.5 In more recent years, the curtilage of Stace House has been truncated and modern residential development has taken place in its immediate surrounds.
- 8.6 The junction location of the Listed building means it can be approached from the north and south via Beacon Oak Road, from the east via Woodchurch Road, and from the west via Golden Square.
- 8.7 The principal western elevation is best viewed and appreciated from the private forecourt. This same elevation can only be glimpsed from public areas i.e. the road junction to the west. There are also glimpsed views of the northern and eastern elevations from Woodchurch Road. The remainder of the Listed building will be best appreciated from its private garden.
- 8.8 The primary views out from the Listed building are from its principal elevation, across the forecourt and Beacon Oak Road to the west, and from the southern elevation, across the private garden.
- 8.9 The site is very largely screened from Stace house by intervening vegetation, with only a glimpse of its corner visible (Plate 20).



Plate 20 View to Stace House from the eastern area of the site



Plate 21 View to Stace House from the very easternmost corner of the site

- 8.10 Only from the very easternmost corner of the site is slightly more of the corner of the house visible (Plate 21, above), but this intervisibility is still minimal.

Statement of significance

- 8.11 The Grade II Listing of the Stace House highlights that it is a heritage asset of less than the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of the Tenterden Conservation Area.
- 8.12 The heritage significance of the Listed Building is principally embodied in its physical fabric. It possesses historic interest as a good example of an 18th-century, Queen Anne style dwelling, prominently located at a crossroads. The internal form and layout of the building is unknown; however, any surviving elements that illustrate the past use and circulation of the house will further contribute to this historic interest.
- 8.13 The architectural and artistic interest of the house is derived from its 18th-century brickwork, hipped roof, and high-quality architectural details, which include a pedimented front doorway with pilasters, fanlight, and four-panel door. There is potential for internal architectural and decorative features which will further contribute to this architectural and artistic interest.
- 8.14 The historic core of the house is clearly legible and appears to be largely intact, and there is no known evidence of this building replacing an earlier dwelling or occupied site. Therefore, the archaeological interest of the building appears to be limited.
- 8.15 The setting of Stace House also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:
- The forecourt, from which the historic and architectural interest of the principal western elevation of the house can be best appreciated;

- The private garden area, which contributes to the historic interest of the property by illustrating its domestic curtilage;
 - Its surviving ancillary buildings, including the outbuilding to the north-east which appears to be in separate ownership and has been converted to residential use;
 - The earliest surviving elements of the brick boundary wall, which demarcate the historic curtilage and may be curtilage listed;
 - The adjacent road junction, which forms the main approach to the house (currently and historically) and from which there are public glimpses of the Listed building's principal elevation; and
 - Grade II Listed Craythorne, situated to the north on the opposite side of Woodchurch Road, which is near-contemporary with Stace House and is a long-standing element of its immediate surrounds.
- 8.16 Other elements of the historic surrounds of the Stace House building have been lost, or else their historic association with the Listed building has been severed and is no longer legible, such as the fields to the east and south-east (the site).
- Any contribution of the site through setting
- 8.17 The 1843 tithe map records that Stace House and most of the site were in the shared ownership and occupation of Elizabeth Manclarke (Plate 22). The site therefore formed the wider working agricultural estate that belonged to the house at that time.
- 8.18 This agricultural land has since been alienated from the Listed building and physically separated by intervening modern dwellings and their gardens, as well as a dense cluster of trees at the western corner of the site. The site is no longer legible as part of the historic wider agricultural estate of Stace House and it does not illustrate the domestic function of the Listed building.
- 8.19 The orientation of the Listed building is such that there are no designed views towards the site. The intervening modern residential plots and the trees at the

western corner of the site largely screen incidental views of the site from the Listed building and its curtilage.

- 8.20 The site makes no contribution to the heritage significance of Grade II Listed Stace House through setting.



Plate 22 Extract of the 1843 tithe map for the parish of Tenterden showing those parcels within the application site (shaded blue) which historically occupied with to Stace House (location outlined in blue).

Impact assessment

- 8.21 Whilst the site is not considered to contribute to the heritage significance of Stace House through setting, a set back of built form has been included in the masterplan to ensure development does not overshadow the structure or its curtilage.

8.22 No harm to the heritage significance of the asset through setting is anticipated.

9. CRAYTHORNE

- 9.1 Craythorne is a Grade II Listed building that was added to National List on 8th May 1950 (NHLE 1203630) (Plate 22). The List entry describes the house as follows:

"Late C18, 3 storeys. Stuccoed and grooved in imitation of masonry. Rippled roof and bracket eaves cornice. Stringcourse above ground and 1st floors. 2 bay windows on all floors. Between the bays a doorcase up 5 steps with fluted Doric columns, open pediment and semi-circular fanlight. The centre 1st floor window above the doorcase has a pediment over it. Above this window there is a rusticated lunette window with glazing bars intact."

- 9.2 The Listed building is situated within its private garden on slightly elevated land on the north side of Woodchurch Road, immediately north-east of the crossroads with Beacon Oaks Road and Golden Square. There are two terraces of 1960s dwellings immediately north-east of the Listed building, although built in brick to complement the architectural style of Craythorne.



Plate 23 Looking north-west to Craythorne from Woodchurch Road

- 9.3 Historic mapping indicates that the grounds of Craythorne were once more extensive and included a formal garden and pond to the east and orchards to the north. These grounds have since been truncated by modern residential development to the north and east.
- 9.4 Historically the main approach to Craythorne was via a pathway off Woodchurch Road which led directly to the principal southern elevation of the house. This pathway is no longer extant. Today, the house is approached via a secondary pathway and modern driveway off Beacon Oak Road.
- 9.5 There are views of the principal southern elevation of Craythorne from Woodchurch Road, although partially screened by intervening boundary vegetation. This elevation is best appreciated from the private front garden and road. From Beacon Oak Road there are views of the secondary western façade.
- 9.6 The principal southern elevation of Craythorne possesses three pairs of bay windows, aligned vertically across all three floors. This is indicative of designed, south-facing views across Woodchurch Road. Historically, it appears that the dwelling, ancillary buildings, and gardens of Stace House would have formed the main content of these views, while the upper windows of Craythorne would have overlooked Stace House towards the grounds and parkland of Hales Place further to the south. In addition to this, there were probably peripheral views of Golden Square to the south-west and the agricultural land to the south-east (including the site).
- 9.7 The content of these designed, south-facing views has since changed, principally as a result of modern residential development along Woodchurch Road and Beacon Oak Road.
- 9.8 From the windows of the secondary, western façade of Craythorne, there are views across Beacon Oak Road to residential development beyond.

Statement of significance

- 9.9 The Grade II Listing of Craythorne highlights that it is a heritage asset of less than the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of the Tenterden Conservation Area.
- 9.10 The heritage significance of the Listed Building is principally embodied in its physical fabric. It possesses historic interest as a good example of a late 18th-century dwelling, prominently located at a crossroads. The internal form and layout of the building is unknown; however, any surviving elements that illustrate the past use and circulation of the house will further contribute to this historic interest.
- 9.11 The architectural and artistic interest of the house is principally derived from its principal southern façade, which is stuccoed to emulate masonry and possesses high-quality architectural details including a pedimented doorway and window, bay windows, and a corbel table. There is potential for internal architectural and decorative features which will further contribute to this architectural and artistic interest.
- 9.12 The Listed building appears to be of limited archaeological interest. Its historic core is clearly legible and largely intact, and there are no known antecedent structures or earlier occupation of the plot.
- 9.13 The setting of Craythorne also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:
- The private garden area, which contributes to the historic interest of the property by illustrating its domestic curtilage as well as facilitating key views of the building;
 - The low brick boundary wall, which demarcates the historic curtilage of the house;

- The adjacent road junction, which forms the main approach to the house (currently and historically) and from which there are public glimpses of the Listed building's principal elevation;
- Grade II Listed Stace House, situated to the south on the opposite side of Woodchurch Road, which appears to slightly pre-date Craythorne and forms the foreground content of designed views out from the principal elevation of Craythorne; and
- The grounds and parkland of Hales Place further to the south, which appear to have been other components of the intended content of designed views out from the principal elevation of Craythorne.

Any contribution of the site through setting

- 9.14 The 1843 tithe map indicates that Craythorne and the site were in separate ownership and occupation. There is no evidence of a historic association in terms of landownership or functional use.
- 9.15 The elevated position of Craythorne and the bay windows of its principal southern elevation make it likely that there were peripheral views of the site historically, although the site was evidently not the focal point of these designed views.
- 9.16 As noted above, the content of these views has changed considerably since Craythorne was built. Modern residential development along the south side of Woodchurch Road now intervenes between the site and the Listed building. There also appears to be greater intervening tree cover between the Listed building and the site today than there was historically, thus further curtailing peripheral views of the site.
- 9.17 Glimpses of the upper elements of Craythorne are possible from within the site, with views to these elements partially screened by vegetation in winter, and anticipated to be almost entirely screened in the summer (Plate 24).



Plate 24 Glimpsed and filtered view of the upper elements of Craythorne from within the site

- 9.18 Reciprocal views would be not only partial and filtered, but also beyond and in the context of residential development on the southern side of Woodchurch Road and eastern side of Beacon Oak Road. The site is not considered to contribute to the heritage significance of Craythorne through setting.

Impact assessment

- 9.19 No harm to the heritage significance of the asset through setting is anticipated.

10. GRADE II LISTED DOVENDEN

- 10.1 The Grade II Listed Dovenden was considered as part of the Step 1 Assessment of assets in the Heritage Statement and discounted from further assessment. Following the mention of the asset by a third party, a full assessment is included here.
- 10.2 Dovenden is a Grade II Listed building that was added to the National List on 8th June 1972. The List Entry describes the asset as follows:
- "Late C18 to early C19, 3 storeys painted brick. Eaves cornice. Fluted pilasters flank the front from 1st to 2nd floor, 3 sashes, with glazing bars intact on upper floors. 2 large C19 bay windows of red brick on the ground floor. Between them is a stuccoed porch with pilasters, rectangular fanlight and 8 panelled door."*
- 10.3 The principal façade of Dovenden is its rendered south-eastern elevation of three bays and three storeys, which is characterised by a central neo-classical porch with fluted pilasters and moulded cornice; a pair of projecting ground floor bays; and symmetrical arrangement of sash windows across the first and second floors (Plate 25).
- 10.4 The property faces Woodchurch Road but is set back from the highway behind a front garden and formal boundary treatment of low brick walling with painted cast iron gate and railings, installed between brick piers. There is a further garden area to the rear.
- 10.5 Dovenden is recorded as 'Viney' on the 1843 tithe map for the parish of Tenterden (Plate 26 Extract of the 1843 tithe map showing Dovenden (then known as 'Viney')). The accompanying apportionment describes the plot as containing a house, lawn, yard and pond, owned and occupied by Vanderlure Mills. In the same ownership and flanking the house plot on its north and east sides were an additional garden area (no. 1471) and parcels of pastureland (nos. 1469, 1470 and 1473).
- 10.6 Since the tithe map was drawn, the wider landholdings of Dovenden have been subdivided and residentially developed. The historic pond is still extant, although now part of a separate plot (Little Dovenden).



Plate 25 The Grade II Listed Doveden, looking north-west

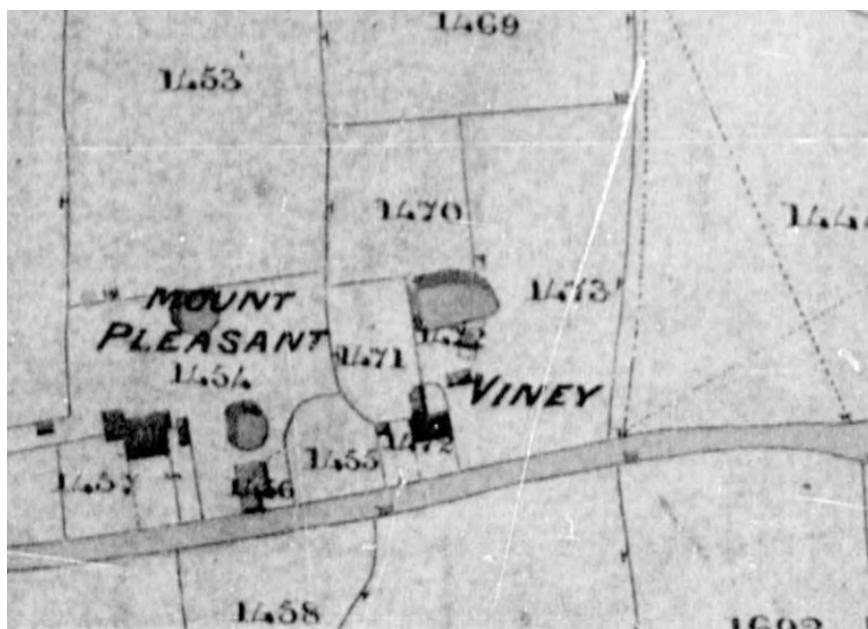


Plate 26 Extract of the 1843 tithe map showing Dovenden (then known as 'Viney').

10.7 Woodchurch Road provides the approach to Doveden, both currently and historically, with the principal elevation of the property being designed to face this thoroughfare. It is from the road and the private front garden that the asset is best viewed and appreciated. From within the property, primary views are

directed in a south-easterly direction across Woodchurch Road towards the modern residential built form opposite.

Statement of Significance

- 10.8 As a Grade II Listed building, Dovenden is a designated heritage asset of less than the highest significance as described by the NPPF.
- 10.9 This heritage significance is principally embodied in the physical fabric of the building, and especially its primary south-eastern façade. It possesses historic, architectural and artistic interest, being a good example of a Regency style dwelling with high-quality neo-classical architectural detailing and decoration. This interest may be augmented by internal features, especially where elements of the historic layout, fixtures and fittings survive.
- 10.10 The setting of Dovenden also contributes to its significance, although elements of its surrounds make a lesser contribution than its historic fabric. As noted above, the historic setting of the asset has been eroded by subdivision of its former gardens and landholdings to the north and east, as well as modern residential development in the vicinity.
- 10.11 Those elements of setting which positively contribute can be summarised as follows:
 - Its curtilage, which comprises the front and rear gardens, the former defined by the formal brick and rail boundary, and illustrates the historic (and ongoing) domestic use of the building;
 - The pond to the north, which was historically part of the asset's domestic curtilage and may be glimpsed from the rear elevation windows; and
 - Woodchurch Road, which the principal elevation of the property was designed to face and be admired from, and which continues to facilitate the best public view of the asset.

Any Contribution of the Appeal Site through Setting

- 10.12 Based on historic mapping, it appears that Dovenden historically possessed south-east-facing views across Woodchurch Road towards a northern parcel of the site;

however, any such views have since been foreshortened by intervening modern residential development. Any glimpses of the land of the site are seen in the context of intervening and proximate modern residences.

- 10.13 There is no evidence of any historic association between the asset and the site in terms of landownership or functional use. The mid-19th-century tithe apportionment indicates that the associated landholdings of the asset were concentrated to the north of Woodchurch Road.
- 10.14 For these reasons, the Appeal Site makes no contribution to the significance of Grade II Listed Dovenden through setting.

Impact Assessment

- 10.15 It is possible that glimpses of the proposed development will be possible from Dovendon, but these will be seen in the context of the intervening and proximate modern residences, and no harm will be caused to the heritage significance of the asset.

11. 13–15 APPLEDORE ROAD

11.1 13–15 Appledore Road was discounted from setting assessment in the Heritage Statement. It is not a designated heritage asset. Following the mention of the asset by a third party, a full assessment is included here.

11.2 The Kent HER (ref. TQ 83 SE 310) describes the building as follows:

"The building known as Limes Land Farmhouse is shown on the Tithe Map of 1684 and later mapping. The alignment of the building and plot are both clearly older features of the local landscape than the surrounding buildings. The Farmhouse is a surviving feature of the Limes Land historic landscape - an area of open land with a long history as open pasture, and as a site for public executions."

11.3 It should be clarified that the tithe map for Tenterden dates from 1843 and '1684' refers to the plot number as recorded on that cartographic source (see discussion below). It should also be noted that there is disagreement regarding the location of the gallows (see Appendix 2).

11.4 The principal south-west elevation of the building faces Appledore Road, although set back from the highway by a front garden area (Plate 27). When viewed from the road, the building presents as a single two-storey dwelling of three bays, although it has historically been subdivided to form three then two separate properties. The ground floor is faced in brick whereas the upper storey is clad in tiles. The roof is half-hipped and covered with plain clay tiles. There is a single, central brick chimney stack positioned at the ridgeline. The side elevations have entrances characterised by a modern external door and canopy porch. The building appears to have been extended to the rear, as expressed by the tiled catslide roof that descends to ground-floor level (Plate 28). Windows appear to be casements. I have not inspected the interior of the building.



Plate 27 Principal (south-west) elevation of 13-15 Appledore Road as seen from Appledore Road



Plate 28 Rear elevation of 13-15 Appledore Road as seen from within the site

- 11.5 The building is surrounded by gardens to the front and rear and there is a timber shed in the rear garden area to the north. The curtilage boundary is characterised by a mix of timber post and wire fencing, hedges, shrubs, and trees, bounded by Appledore Road to the south-west and open land to the north-east (the Appeal Site).
- 11.6 The 1843 tithe map appears to show the rectangular footprint of 13-15 Appledore Road and its associated plot (Plate 29). The plot number has been largely erased on the copy reproduced below, however it has been recorded as plot 1684 elsewhere. According to the accompanying tithe apportionment, plot 1684 comprised three cottages and gardens owned by Elizabeth Manclarke but occupied by Joseph Gilbert, William Hopper and Walter Coseby.



Plate 29 Extract of the 1843 tithe map for the parish of Tenterden with the location of 13-15 Appledore Road marked with a blue arrow

- 11.7 The First Edition Ordnance Survey map of 1870 (Plate 30) illustrates the plan of the building in greater detail, by which time it had been internally reorganised into two properties. Its gardens were crossed by pathways and the north-eastern

boundary defined by trees. Since that time, the curtilages of the properties have been enlarged and modern residential development has occurred either side on Appledore Road.

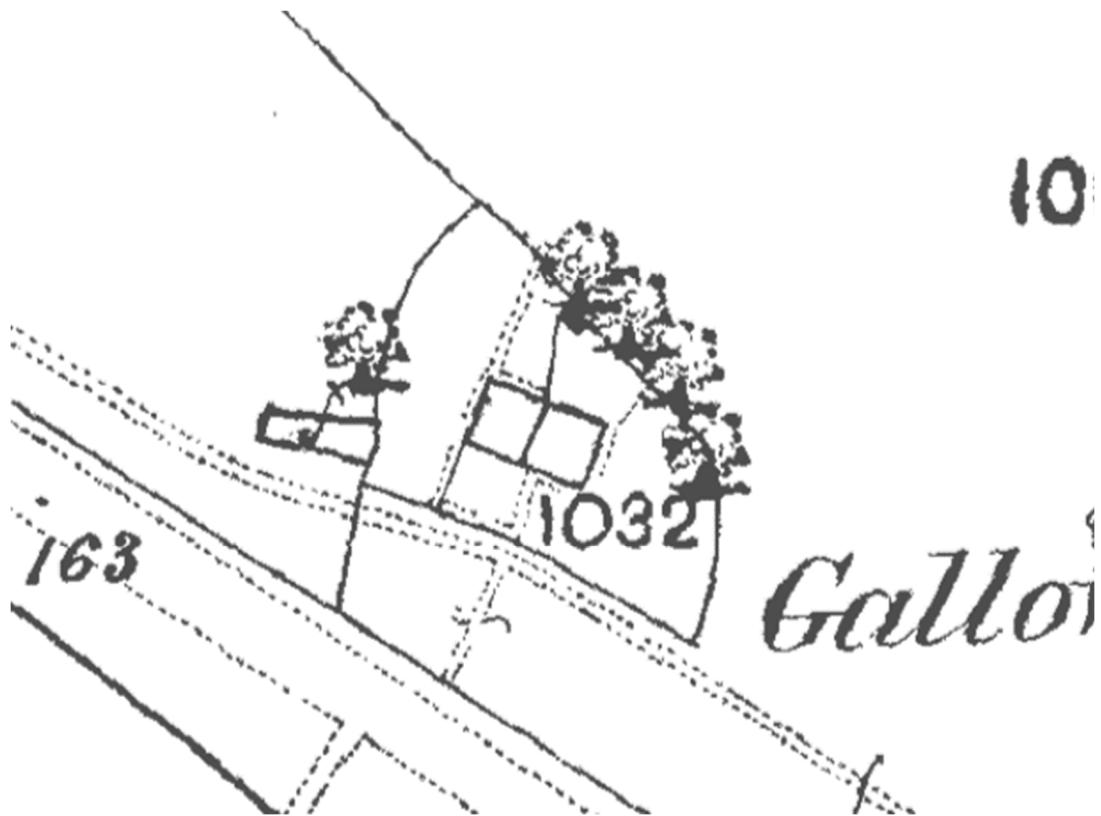


Plate 30 Extract of the First Edition (1870) Ordnance Survey map showing 13-15 Appledore Road

- 11.8 13-15 Appledore Road is best publicly viewed from Appledore Road, as well as from the private front garden area. From these vantage points, the principal elevation of the building can be appreciated. There is no clear public visibility of the rear elevation. The arrangement of windows and the siting of the catslide roof clearly demonstrate that primary views from the building are directed to the south-west across Appledore Road, with views north-east not a designed focus of the built form. This is corroborated by the vegetation close to the rear shown on historic maps. The extended rear elevation possesses only ground-floor windows and, due to intervening vegetation, there is only partial visibility of the land to the north-east (the appeal site).

Statement of significance

- 11.9 13-15 Appledore Road is a non-designated heritage asset. Whilst one third-party objector has asserted that the building fulfils the selection criteria for statutory listing but this is unevidenced and disputed.
- 11.10 The heritage significance of the building is principally embodied in its physical fabric. Externally, the building presents as a 19th-century vernacular dwelling of brick and tile construction, from which it derives some historic and architectural interest. This significance has been partly undermined by modern alterations, namely the side porches, and as a result of successive subdivision and reorganisation and probable extension.
- 11.11 It is possible that the building originated as a single dwelling based on the arrangement of the principal elevation and the single, central chimney stack. Nonetheless, it is clear from 19th-century mapping that the building existed as three cottages by 1843 before being converted to two dwellings by 1870. These changes to the subdivision of the property will have inevitably altered the internal layout and circulation of the building and resulted in the loss of historic fixtures and fittings as the building was adapted to different occupants.
- 11.12 It is possible that earlier fabric survives and is expressed internally, but no clear or compelling evidence has been presented to corroborate assertions that the building dates from the early 18th century. Based on the altered exterior of the property and its known remodelling from the mid-19th-century onwards, it is clear that the building would fall far short of the selection criteria for statutory listing.
- 11.13 The setting of 13-15 Appledore Road also contributes to its heritage significance, but to a considerably lesser extent than its historic physical fabric.
- 11.14 The gardens of the building contribute most in terms of setting since these illustrate the historic and ongoing domestic function of the building, although it should be reiterated that the curtilage boundaries have been reorganised and extended since the 19th century.

11.15 Appledore Road also contributes through setting. This constitutes the main thoroughfare and approach to the building, both currently and historically, and also facilitates public views of the principal south-west elevation.

Any contribution of the site through setting

11.16 The agricultural land to the north-east (the appeal site) is not considered to make any contribution to the significance of the building through setting.

11.17 The mid-19th-century tithe apportionment records that the domestic plot and the land of the site were under separate occupation and the then cottages were not leased with any of the surrounding agricultural land. A later functional association may have existed. Ultimately, the land of the appeal site does not better reveal the historic and architectural interest of the asset, which is ultimately derived from its legibility as a vernacular dwelling. The building does not appear to have designed intervisibility with the site.

11.18 The site makes no contribution to the heritage significance of 13-15 Appledore Road through setting.

Impact assessment

11.19 The building will retain garden plots following the proposed development.

11.20 The part of the appeal site nearest 13-15 Appledore (immediately to the west), is proposed as a pedestrian link/access between Appledore Road and the new residential development. A new access will replace an existing gravelled trackway that currently runs through this part of the site. In terms of soft landscaping in the vicinity of the building, vegetation at the north-eastern curtilage boundary of Lime Lands Farmhouse will be augmented with native hedgerow planting and reed beds will also be established to the north-east and north-west.

11.21 The proposed dwellings are not anticipated to be prominently co-visible with 13-15 Appledore Road in key views to the frontage of the building from Appledore Road due to the intervening space and vegetation, and perspective.

11.22 From the extended rear elevation and rear garden curtilage of the building, there is potential for private glimpses of new built form, although it is anticipated that these glimpses would be filtered by the existing and augmented boundary

vegetation. Ultimately, the changes to these non-key views would not undermine the ability to appreciate the historic fabric of the building or its legibility as a vernacular dwelling.

11.23 For these reasons, the proposed development will cause no harm to the heritage significance of 13-15 Appledore Road through change to its setting.

12. HISTORIC LANDSCAPE AND ARCHAEOLOGICAL REMAINS

- 12.1 Matters relating to archaeology and historic landscape elements are assessed in the Statement of Mr Duncan Hawkins, which forms Appendix 2 of this Proof of Evidence, including a full consideration of points raised by third parties.
- 12.2 Mr Hawkins conclusions are:
- That the site of the gallows historically known to be in the locality was outside of the Appeal Site.
 - That with appropriate mitigation and enhancement measures, there will be no overall harm to the heritage significance of archaeological remains or historic landscape features.
- 12.3 I have reviewed Mr Hawkins' assessment and I agree with his conclusions.

13. DISCUSSION OF LAW AND PLANNING POLICY

- 13.1 No harm to any heritage assets has been identified and as such, the scheme is considered to be compliant with all relevant law, policy and guidance.
- 13.2 As no harm will be caused and the character and appearance of the Conservation Area will be preserved, the proposed development is considered to comply with Sections 66 and 72 of the Planning (Conservation Areas and Listed Buildings) Act of 1990.
- 13.3 Likewise, as no harm will be cause to the heritage significance, the proposed development complies with policy relating to heritage in the NPPF.
- 13.4 With regards to policies ENV13, ENV14 and ENV15 of the ABLP (2019), the proposals are not in conflict with ENV13 and ENV15 as no harm will occur, nor ENV14, as the tree within the Conservation Area will be retained. With regards to HOU5, the development complies with criterion (e).
- 13.5 A Neighbourhood Plan for Tenterden is currently at an early stage of preparation, and has not yet been adopted. As such, I understand it can be given little weight.
- 13.6 With regards to Tenterden Neighbourhood Plan Draft Policy TEN NP5, this requires that the character of the Tenterden Conservation Area and its setting is preserved, which the proposed development will achieve.
- 13.7 Policy TEN NP7 relates to non-designated heritage assets and states that "*Proposals should take into account the effect on the significance of a non-designated heritage asset...and wherever possible seek to protect the asset.*" As discussed in Appendix 2, the heritage significance of non-designated heritage assets will be perpetuated.

14. CONCLUSIONS

- 14.1 Heritage has been a key consideration in the design of the proposed scheme, in terms of built heritage and also historic landscape.
- 14.2 The mature horse chestnut tree within the part of the site that lies within the Conservation Area and positively contributes to its character and appearance will be retained. Hence, the character and appearance of the Conservation Area will be preserved.
- 14.3 Consideration of the views to St Mildred's Church has been a key consideration in the design of the proposed masterplan. Three view corridors have been created to frame views of the church from the higher ground crossed by public footpath AB12 (See DAS Section 3.10 – Key View Photomontages, and the LVIA, Viewpoint 5, Viewpoint 9 and Viewpoint B).
- 14.4 In these views, the tower of the church will still be visible above the line of vegetation within the Conservation Area, maintaining views to the asset from this general area.
- 14.5 The change within the views and the blocking of some other views from the high ground will cause no harm to the heritage significance of the Church or the Conservation Area, as they make no particular contribution to the heritage significance of the assets, being distant views to the church from this general area which are not illustrative of its architectural detail, its topographic situation on a local high point, or its location within the historic settlement core.
- 14.6 The change of character of the site may also be glimpsed from Appledore Road on the approach to the Conservation Area and on its edge. These changes on the approach to the Conservation Area that is flanked by modern housing would cause no harm to the heritage significance of the asset through setting.
- 14.7 In summary, the proposed development would preserve the character and appearance of the land within the Conservation Area, and cause no harm to the heritage significance of the church of St Mildred and the Tenterden Conservation Area through changes in setting.

- 14.8 Furthermore, no harm is anticipated to any other designated heritage assets nor the non-designated 13-15 Appledore Road.
- 14.9 The hedgerows, ponds, extant ridge and furrow earthworks, footpath and trackway will all be largely retained within the proposed scheme and, with mitigation and enhancement measures, no harm is anticipated to their heritage significance.