



ASHFORD
BOROUGH COUNCIL

**Proof of Evidence by SARAH DEE BSc (HONS) DIP TP
IHBC**

in respect of:

Land south of M20, Church Lane, Aldington, Kent

Appeal by:

EDF Energy Renewables Limited (trading as EDF Renewables)

**Against refusal to grant full planning permission
for:**

**Installation of a solar farm with a generating capacity of up to 49.9MW
comprising: ground mounted solar panels; access tracks;
inverter/transformers; substation; storage, spare parts and welfare cabins;
underground cables and conduits; perimeter fence; CCTV equipment;
temporary construction compounds; and associated infrastructure and
planting scheme.**

Appeal Reference: APP/E2205/W/24/3352427

Planning Application Reference: 22/00668/AS

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1 Introduction

- 1.1 This Proof of Evidence has been prepared by Sarah Dee, Senior Conservation Officer at Ashford Borough Council. I have a BSc Honours Degree in Heritage Conservation, a Post Graduate Diploma in Town Planning and I am a full Member of the Institute of Historic Building Conservation. I joined Ashford Borough Council as a Conservation Officer in May 2006 and I have worked in Local Authority Development Control for over 30 years.
- 1.2 I am familiar with the appeal site and with the proposals.

2 Legislation, Policy and National Guidance

2.1 Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.1.1 Section 66(1) of the 1990 Act states that: *in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*
- 2.1.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that *special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.*

2.2 Planning Policy

- 2.2.1 NPPF

- 2.2.2 Designated and non-designated heritage assets are given protection under the National Planning Policy Framework (NPPF), the original version of which was published by the then Department for Communities and Local Government in 2012. The latest revised version of the NPPF was published in December 2024 and which preserved the approach to conserving and enhancing the historic environment presented in the previous iteration.
- 2.2.3 Provision for the historic environment is considered in Section 16 of the NPPF, which directs Local Planning Authorities to set out '*a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats*' (NPPF (2024), para. 203). The aim is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.
- 2.2.4 Paragraph 207 of the NPPF states that '*In determining applications, local planning authorities should require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*'
- 2.2.5 Paragraph 208 of the NPPF instructs Local Planning Authorities to '*identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise*'.

- 2.2.6 Paragraph 212 of the NPPF states that *‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’*.
- 2.2.7 Paragraph 213 of the NPPF explains that *‘any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’*. As a corollary, paragraph 215 states that *‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’*.
- 2.2.8 In addition to the effects on designated heritage assets, paragraph 216 of the NPPF states that *‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’*.
- 2.2.9 NPPF Annex 2: Glossary defines significance 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. Significance derives not only from a heritage asset’s physical presence, but also from its*

setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."

2.2.10 The Glossary also defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

NPPF Annex 2

2.3 Ashford Local Plan

2.3.1 Policy SP1 – Strategic Objectives

2.3.2 Policy SP6 – Promoting High Quality Design

2.3.3 Policy ENV13 - Conservation and Enhancement of Heritage Assets

2.4 Aldington and Bonnington Neighbourhood Plan (ABNP)

2.4.1 Much of the appeal site falls within Aldington Parish and is therefore subject to the newly adopted Aldington and Bonnington Neighbourhood Plan (ABNP). Only the part of the site between the railway line and M20 motorway does not fall within Aldington parish.

2.4.2 The central aim of the plan is to preserve the area's rural characteristics. *"This plan came into being after a period in which Aldington grew rapidly and local people felt that their views about this were ignored. The resulting population expansion took several years to be assimilated into the community, and a campaign group was formed to lobby Ashford Borough Council for planning policy to preserve the neighbourhood area's rural characteristics. Planning*

has remained a contentious topic in the joint parishes of Aldington & Bonnington ever since.”

2.4.3 The plan includes 6 objectives, each with a number of policies beneath them.

The most significant from a heritage standpoint are Ob1 and Ob3:

2.4.4 Objective 1 is to conserve the rural landscape, character and views; and,

2.4.5 Objective 3 is to celebrate built heritage and achieve high-quality design.

2.4.6 The proposal is contrary to Policy AB11 of the neighbourhood plan as it will detract from the setting of several designated and non-designated heritage assets.

2.4.7 Policy AB11 section B states, *Development proposals affecting designated heritage assets (Figure 17) either directly or indirectly, should preserve or enhance the significance of the asset, including those elements of the setting that do not contribute to the significance. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in the local area. Proposals affecting non-designated heritage assets will be assessed having regard to the scale of any harm or loss against the significance of the heritage asset.*

2.4.8 Policy AB11 also identifies several non-designated heritage assets, which do not relate to this Appeal proposal, however, para 6.36 refers to the Kent HERS, which “...contains details of additional assets, some of which are not nationally listed. The record should be consulted by prospective developers to establish and, where necessary, protect and conserve the local significant

historic environment. The Neighbourhood Plan area is notably rich in historic assets due to its association with the Roman port of Lympne.”

2.4.9 The ABNP includes a map (Fig 1) which identifies designated heritage assets in the neighbourhood area. The highlighted area has been added for the benefit of this Proof of Evidence to roughly show the Appeal site

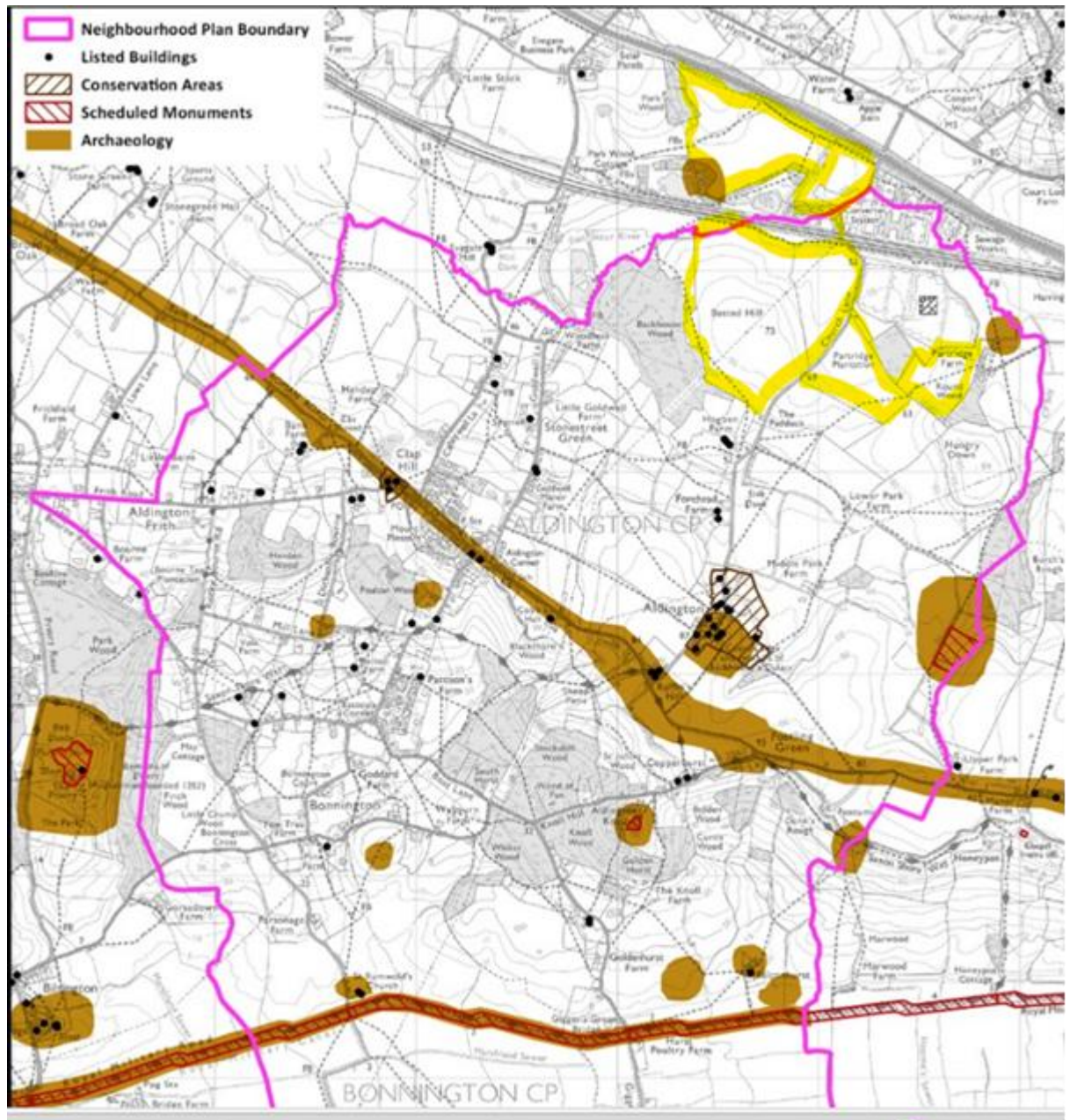


Fig 1 From Aldington and Bonnington Neighbourhood Plan and which identifies designated heritage assets in the neighbourhood area. Highlighted area roughly shows Appeal site.

2.4.10 The ABNP also identifies Local Character areas, of which this one in Figure 2, shows Church Lane Conservation Area, which is relevant to this appeal.

Local Character Area

CA2: Church Lane Conservation

Area: located along Church Lane to the eastern side of Aldington parish, this was designated as a conservation area in 1973 and it is one of the oldest hamlets in the neighbourhood area. Key features in the area include the Grade I listed church of St Martin's and its 16th-century tower, the Grade II* listed Court Lodge Farmhouse and the remains of the Archbishop's Palace located behind the church. In addition, there are Grade II listed cottages and barns, as well as a lychgate and quadrant walls attached to the churchyard. The use of ragstone is quite prevalent in this Character Area and can be found on boundary walls and building facades. Lastly, Court Lodge farm, located adjacent to the church, is one of the two remaining working farms in the neighbourhood area.



Fig 2 Local Character Area taken from Aldington and Bonnington Neighbourhood Plan.

2.5 Ashford Borough Council Heritage Strategy

2.5.1 The geographical position of Ashford has been a dominant factor in its history and development. The rich historic environment has played a major role in shaping the Borough's development and identity. The Heritage Strategy seeks to understand and clarify the significance of such a wealth and wide-ranging nature of historic assets in the borough and to establish how this rich heritage offer can positively contribute to the future of the borough and the key sustainability objectives of the Local Plan. The documents sets out

recommendations to ensure that future policies and approaches to the borough's heritage are based on a clear understanding of its significance and its value in order to ensure that the heritage of the borough in shaping future regeneration, development and management decisions.

2.6 National Planning Practice Guidelines

- 2.6.1 The NPPF is complemented by a series of National Planning Practice Guidance documents, which include specific guidance on the application of the NPPF to the historic environment, published in 2014 and updated in July 2019. Regarding how proposals can avoid or minimise harm to the significance of a heritage asset, the guidance states that *'analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance'* (Paragraph: 008 Reference ID: 18a-008-20190723).
- 2.6.2 The guidance goes on to state that *'Applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance'* (Paragraph: 009 Reference ID: 18a-009-20190723)
- 2.6.3 The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not

visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

2.6.4 The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

2.6.5 When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

2.7 Historic England Guidance

2.7.1 Historic England, who are the Government's advisors on heritage matters have produced several guidance notes relating to assessing and managing heritage significance and setting of heritage assets. These documents are valuable when considering the potential impact of developments on the significance of heritage assets. Whilst not wishing to reproduce the whole documents, certain paragraphs, which are considered to be most relevant to this Appeal have been included and highlighted/underlined, as necessary.

2.7.2 ***Managing the Significance of the Historic Environment in Decision-Taking*** (Historic England 2015). It is advised that significance should be assessed as part of the application process. It also advocates understanding the nature, extent, and level of significance of a heritage asset by considering

the aesthetic, communal, historic and evidential values which a heritage asset may hold.

2.7.3 **Statements of Heritage Significance** (Historic England 2019) advises using the terminology of the NPPF and Planning Practice Guidance and indicates that significance should be considered to be derived from a heritage asset's archaeological, architectural, artistic and historic interest.

2.7.4 **The Setting of Heritage Assets** (Historic England 2017) provides information on good practice to assist in implementing historic environment policy. It gives detailed advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

2.7.5 Para 3 reminds decision-makers about the statutory duty to have special regard to the desirability of preserving listed buildings and their settings and the twin roles of setting; in its contribution to the significance of a heritage asset and how it can allow that significance to be appreciated.

2.7.6 Part 1 *The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors...and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

2.7.7 Para 7 *To avoid uncertainty in discussion of setting, a landscape is 'an area, as perceived by people, the character of which is the result of the action and interaction of natural and/ or human factors' (Glossary, Guidelines for*

Landscape and Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment, p 157, based on the definition in the European Landscape Convention, European Treaty Series – No. 176, Florence, 20.x.2000, p 2).

2.7.8 Para 8 - The extent of setting – *The NPPF makes it clear that the extent of setting is not fixed and may change as the asset and its surroundings evolve...Extensive heritage assets such as ...landscapes...can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated...*

2.7.9 Para 9 Setting and economic viability. *...the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development...*

2.7.10 Para 10 - Views and setting. *The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset*

2.7.11 Para 11 *Views which contribute more to understanding the significance of a heritage asset include...those where the composition within the view was a fundamental aspect of the design or function of the heritage asset; those where town- or village-scape reveals views with unplanned or unintended beauty; those with historical associations, including viewing points...*

2.7.12 Para 19 Development proposals involving...more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis, often taking place within the framework of Environmental Impact Assessment procedures. (Whilst)...detailed assessment techniques and complex forms of analysis such as viewshed analyses, sensitivity matrices and scoring systems...may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that, when submitted as part of a Design and Access Statement, Environmental Statement or evidence to a public Inquiry, technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out ‘what matters and why’ in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them.

3 The proposed scheme

- 3.1 The proposal is for a solar farm with ground mounted solar panels and ancillary development, such as access tracks; buildings, fencing and landscaping. The details of these works have been covered in the Main Statement of Common Ground, but generally it is the above ground development – in particular the solar panels themselves and the boundary treatments which are most applicable to the built heritage aspect.

4 Heritage Impact

- 4.1 This Chapter identifies designated heritage assets which surround the proposed development area and presents an assessment of the likely impact which the scheme will have upon them.
- 4.2 The submitted application did not include a separate Heritage Statement, but Chapter 12 – Archaeology and Cultural Heritage was included in the submitted Environmental Statement Volume 2a - Written Statement - chapters 0 – 17 (referred to as ES in this document), with figures and viewpoints located in different documents. Further information was provided in January of this year to supplement the application, but there does not appear to have been any additional points raised, relating to built heritage assets.
- 4.3 The Environmental Statement identified five Designated Heritage Assets, as being relevant to the proposal. They are: -
- Aldington Church Conservation Area and Clap Hill Conservation Area (mentioned as one)
 - Grade I Listed Church of St Martin
 - Grade II* Listed Court Lodge and
 - Grade II* Listed Evegate Manor.
- 4.4 The Main Statement of Common Ground agrees harm to the Church of St Martin and Court Lodge. In my professional opinion they have underestimated the potential harm to these two Listed buildings. Whilst I agree that the level of harm is less than substantial, in terms of the NPPF test, I disagree that the harm is at the lower end of the scale. I consider the harm to be at the higher end of the scale.

- 4.5 St Martins Church and Court Lodge lie within Aldington Church Conservation Area and have been correctly identified by the Appellant as high-status buildings, but it does not fully acknowledge the contribution that their setting makes to their significance.
- 4.6 As identified in Historic England's comments of 5 September 2022 (**CD2.1.9**) and 11 March 2024 (**CD2.2.5**) (referred to collectively as HE comments in this Proof), the origins of these two buildings as a former chapel and hunting lodge (now parish church and farmhouse) both buildings *derive some significance from their landscape settings which help explain their rural origins and provide an attractive backdrop which enhances their aesthetic value in key views...* I agree with this point and consider that both of these buildings derive a meaningful level of their significance from their historic relationship with each other (and the wider group – more on that later) and their relationship with the surrounding historic landscape.
- 4.7 **Church of St Martin.**
- 4.7.1 Rural churches of this date were landmarks: being visible within the rural landscape and even possibly being visible to and from other parish churches. The church and in particular the tower, is visible as you move through the landscape not just from static viewpoints. This is more than visibility: it is its wider setting. You catch glimpses of the tower and the conservation area settlement; sometimes more distinctly than others. We know that the historic lanes and field patterns have changed little over the centuries and so we can be confident that these long views are to some extent historic. There have been few, significant, manmade intrusions into this landscape. *The church tower is set at the highest point of the village which is key to understanding*

the historic significance of its setting. The tall flint and stone structure commands presence in long views towards the small settlement, most notably, views approaching the settlement from the north along Roman Road. Here the falling land emphasises the tower's height as the most prominent building in the landscape (HE comments). There is a symbiotic relationship between the contribution made by the church to the historic landscape and the reciprocal value the open landscape gives to the church. The high status of the church and the scale of the development – which is acknowledged to be visually at odds with the surroundings - will negatively impact on the setting of the church within certain views. These have either been downplayed, or not included in the assessment. Fig 3, below, shows View south from PROW AE459 south towards Aldington Church Conservation Area. The church tower and conservation area are visible in the centre of the picture and the field in the foreground is part of the Appeal site and is identified to have solar panels across its width. Fig 4 shows the same view, but zoomed in to show the church tower for clarity.

4.7.2 Although there needs to be some identification of views for illustration, it is misleading not to consider the concept of movement through a space, as this is generally how the historic environment is appreciated.

4.7.3 The ES concludes that whilst the church is of national significance it is considered to be of low sensitivity to the proposed development: the application site makes only a minor contribution to the setting of this designated heritage asset. I agree that, in planning terms, the proposed development will result in 'less than substantial harm' to the significance of the church, but I disagree with the Appellant's assessment of the degree of

‘less than substantial harm’, concluding myself that this lies towards the higher end of the scale.

4.7.4 The church is of the highest status and so the test under the framework is that the more important the asset, the greater the weight given to its conservation. The development will not prevent views of the church, but it will encroach into them. Part of the site is on elevated land (Bested Hill), which will amplify its visual impact.



Fig 3 View south from PROW AE459 south towards Aldington Church Conservation Area.

Source: Matthew Durling



Fig 4 Same view as Fig 3 with close up of Church tower and Aldington Church Conservation Area for clarity. Source: Matthew Durling

4.8 Court Lodge

4.8.1 Given the origins of **Court Lodge** as an Archiepiscopal Hunting Lodge for the Archbishops of Canterbury, it is likely that the surrounding land at that time was less cultivated than it later became and continues to be, today. Whilst the original functions of Court Lodge and the associated chapel have evolved over time, so has their relationship with the wider countryside: the special interest of both buildings still derives much from the expansive rural location surrounding it. In terms of Court Lodge, I consider that this is less widespread than for the church, but part of its “*exceptional heritage value*” (HE comments) is derived from its historic relationship with the adjacent church and the proximity of the later agricultural buildings. Therefore, its setting should be considered to reach wider than might normally be considered for a farmhouse – even a farmhouse of this high status. This grouping of high status Listed buildings can be seen from both the development site, across the solar panels and from other vantage points. The Environmental Statement

concludes that *whilst the farmhouse if of national heritage significance it is considered to have a negligible sensitivity to the proposed development* (ES para 12.98). I disagree with this conclusion. Given the collective high status of the group of historic buildings, including Court Lodge, and the visibility of that group from the development site, I consider that the level of harm to the significance of Court Lodge to be higher than negligible and to be in the middle of the scale.

4.9 Aldington Church Conservation Area.

4.9.1 The ES refers to Clap Hill Conservation Area at the same time as Aldington Church Conservation Area, but these are in completely different areas and have significantly different special characters. I do not consider that the proposed development will have a significant impact on the setting or the significance of Clap Hill Conservation Area. However, I do consider that the setting of Aldington Church Conservation Area will be negatively affected by the proposed development. The Environmental Statement (para 12.122-3) concluded that there would be no intervisibility between the conservation area and the site and therefore there would be harm at the lowest level of less than substantial. Fig 3 shows that there will be some views of the conservation area from within the site. I therefore disagree with this assessment and consider that the level of harm will be at the higher end of the scale of less than substantial.

4.9.2 The Appeal site is located approx. 750m to the north of Aldington Church Lane Conservation Area. The conservation area is centred around a church grouping, with a wider scattering of sparsely located, rural cottages and farm buildings. The church grouping consists of the Grade I Listed church and

Grade II* Listed Court Lodge Farmhouse, which was a manor house and hunting lodge, later a farmhouse, The C16 church tower with battlements can be seen from a considerable distance, which was of course, partly its function and contributes considerably to the character of the landscape. Out of the 11 dwellings in the conservation area, 9 are Listed, plus the church and two large barns. This gives the Conservation Area a strong historic value and an overwhelming rural character, surrounded as it is by open countryside, which was presumably once hunting land and later farmland. This land is still farmed and comparing with historic maps, it is evident that the field patterns and boundaries and lanes have not significantly altered over the last 150 years. This high significance will be affected by the scale of the development to the north: as you travel along Church Lane you will either drive through the Appeal site towards the conservation area, or you will be leaving the conservation area. In either case, the current open farmland will be replaced by modern development. The proposed screening will not be adequate to mitigate this harm and will alter the character of the historic landscape.

- 4.10 **Evegate Manor.** The ES states that *due to topography and distance, only the top of the chimneystacks can be glimpsed from with the application site* (ES para 12.102). The application site in its current state is considered to make a neutral contribution to the setting of Evegate Manor, with no material contribution to the significance of the asset. The house is considered to have a negligible sensitivity to the proposed development. Although the chimneys are most likely visible due to function, rather than design, in regards to this building, roofscape is an intrinsic part of its special interest. The proposed development is much closer to Evegate Manor than for the church and the

development will fall into its wider setting. However, it would seem unlikely that the proposed development would have a significant direct impact on the setting of the house. In my view the development would result in a degree of harm that can be considered to be at the lower end of the scale of less than substantial.

4.11 **Additional Heritage Assets**

4.12 The Environmental Statement states in para 12.78 that, *“Within the 1km study area the following designated assets are recorded: Aldington Church Conservation Area, Smeeth Conservation Area, two grade I listed buildings, two grade II* listed buildings and 37 grade II listed buildings. These lie between 250 and 1km from the application site”* ...it goes on to say in para 12.79, *A site visit was undertaken in May 2021 to assess the setting of identified designated heritage assets. The conditions were cloudy with good visibility. Additional desk-based assessment using Google Earth and maps was also utilised. Due to a combination of the intervening M20 and associated planting, the railway embankment, topography, vegetation and distance the majority of these are not considered sensitive to change by the proposed development. This is further detailed in Appendix 12.1.* It goes on to say that only the Church of St Martin, Court Lodge, Aldington Church Conservation Area and Evegate Manor were considered as being potentially sensitive to indirect change by the proposed development.

4.13 The impact on only two Listed buildings has been agreed in the Statement of Common Ground: the church and Court Lodge. Whilst other Listed buildings were not expressly referred to in either the Officer's Report or Historic England's comments, they have not been agreed as being beyond the scope

of this scheme. In my view a number of other designated heritage assets were overlooked by the Appellant and should be taken into account. I disagree that there will be no impact on their significance.

- 4.14 The buildings that I consider to be relevant are the 9 Listed buildings within Aldington Church Conservation Area and Fore Head Farm and Hogben Farm on Church Lane. Fig 1 taken from the Aldington and Bonnington Neighbourhood Plan shows the location of designated heritage assets.

4.15 **Listed buildings**

- 4.15.1 The majority of the buildings in Aldington Church Conservation Area are Listed. As a collective the percentage of designated heritage assets in this small settlement strengthens the value and significance of the group. Added to this is the “*exceptional heritage value*” (HE) of the church and Court Lodge. Within the settlement these other Listed buildings are sparsely sited and they all have a direct relationship to the surrounding open fields, which contributes – in varying extents - to their special interest. The Listed buildings on the northern periphery of the settlement, such as Grove Cottage, Tickner Cottage, Church Farm, Church Hill Cottage and Hogben House are the closest within the conservation area to the development site. As the conservation area and the church tower are visible in long range views within the site – from PROW AE459. What is currently a foreground of open countryside, will become partly encroached upon by the massing of the panels. There is a reasonable distance between the site and the settlement and so these Listed buildings are indistinct - but given the scale of the development and its alien appearance, it will undoubtedly affect the long-range views of this collection of historic buildings. Whilst this harm is less than substantial, I do not consider

development site towards the Listed buildings, as you travel. There is a PROW AE 477 which passes Grove Cottage and goes north towards Middle Park Farm does not seem to have been included in the viewpoint assessment. The scale of the proposed development and its overtly industrial appearance on what is currently farmland, will intrude into the wider setting of these buildings. Whilst it could be acknowledged that *individually* the balance of harm against public benefit could be found in favour of the proposed development, it is the *cumulative* heritage harm on so many designated Heritage Assets which I am of the view needs careful consideration and whether the public benefits would outweigh that. These Listed buildings are not of the highest significance, but in turn they are located closer to the development site, which undoubtedly increases the level of harm for some. I identify that those Listed buildings on Church Lane are likely to be most affected. The level of harm is less than substantial and is at the higher end of the scale.

4.16 Non-Designated Heritage Assets (NDHA)

4.16.1 In addition to Designated Heritage Assets, the NPPF also recognises the status of Non-designated Heritage Assets, being assets which are not formally designated but which are of archaeological, historical or architectural significance.

4.16.2 The Environmental Statement (para 12.105) states that ...*the assessment has identified no non-designated heritage assets that have the potential to be affected by the scheme*. I consider that there are NDHAs that should be taken into consideration.

4.16.3 Ashford Borough Council does not have a Local List, however, KCC HERs identifies archaeological sites and buildings, both designated and undesignated. Given the identified “great time-depth” (Historic England comments) of the area, there are inevitably many historic sites and buildings. On the map in Fig 6 five buildings have been identified with green squares – three are identified as historic farmsteads on the HERs and two are cottages (presumably farmworkers cottages). I consider that these should be considered as NDHAs.

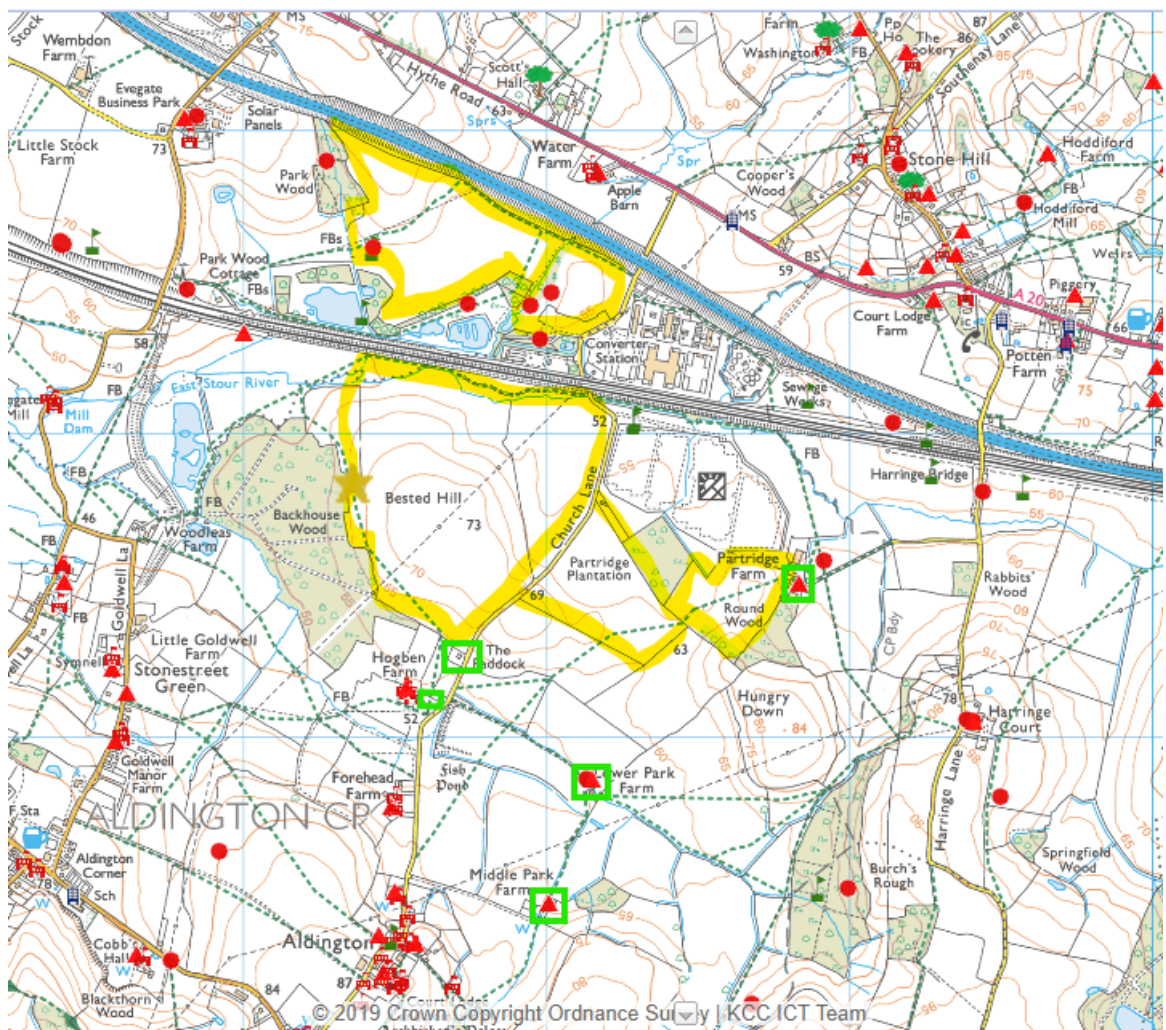


Fig 6 extract from KCC HERs map showing archaeological sites and buildings. Those highlighted with green squares are buildings of interest. The Appeal site is shown roughly highlighted in yellow, for illustration.

4.16.4 The two cottages are –The Paddock and Fore Head (adjacent to Hogben Farm) both on Church Lane.

4.16.5 **The Paddock** is early C20 in date and at the lower end of historic interest, however, its location directly adjacent to the largest area of the development site means that the development will have a higher impact on its rural setting.

Fore Head is an attractive C18 cottage, which as well as being of historic interest in its own right, can also be seen as a positive contribution to the setting of Hogben Farm, as they are close neighbours. Like Hogben Farm, Fore Head derives part of its special interest from its isolated rural location, yet set directly adjacent to the historic lane. It is one field away from the largest area of the development site.

4.16.6 The KCC HERs identifies the farmsteads as Middle Park Farm (post mediaeval, loose courtyard plan farmstead – altered); Lower Park Farm (post mediaeval regular multiyard farmstead – altered) and Partridge Farm (post mediaeval, regular courtyard farmstead -altered). All three are set down long tracks, but as can be seen in Fig 7 the sites at **Lower Park Farm** and **Middle Park Farm** have important views and associations to the farming landscape. They feature historic farmsteads including C19 or earlier properties, barns and outbuildings. Given the topography of the landscape, there is the potential for an impact to their setting.



Fig 7 Image of Lower Park Farm and Lower Park Farm in context of the church and Conservation area and wider rural setting. Source: <https://www.zoopla.co.uk/property-history/lower-park-farm/church-lane/aldington/ashford/tn25-7ej/61293950/>

4.16.7 **Partridge Farm** is directly adjacent to the development site, but is also the most altered, and many modern buildings have been built around the farmstead, which have reduced its significance. Therefore, its interest as a NDHA is probably at the low end, but its direct proximity to the development site means that it will be seen in direct context, further diminishing its interest – although to a low level of harm.

5 Response to Historic England's Comments

5.1 Historic England are a statutory consultee and provide comments independent of the Council's Conservation Officer. In this instance they were consulted due to the potential impact on the setting and therefore significance of the Grade I and Grade II* Listed Buildings, conservation area and any Scheduled Monuments. Generally, they do not comment on proposals affecting the setting of Grade II Listed buildings, unless there are exceptional

circumstances drawn to their attention. I would suggest that this is why they have only referred to the church and Court Lodge and the conservation area and have not referred to any of the closer Grade II Listed buildings and NDHAs.

- 5.2 Bearing that in mind, I do not have any objections to the issues they have raised in either of their responses, which overlap with some of my own views. But at the same time, I have drawn a slightly stronger conclusion about the potential for harm to the heritage assets.

6 Conclusion

- 6.1 I consider that the Environmental Statement understates the likely impact of the proposed development. The scale of the development and the topography of the land within which it will be set, will dramatically alter from open farmland to industrialised, with consequences to the character of the historic landscape and the special character of the buildings that lie within it.
- 6.2 The Framework requires that the more important the asset, the greater the weight given to its conservation and that where there is found to be less than substantial harm, this should be weighed up against any public benefits.
- 6.3 In this instance there are several highly important heritage assets of *exceptional heritage value* which derive part of their special interest from their relationship to the wider historic landscape and which in turn adds to their appreciation. The proposed development will encroach into the long range views and which will diminish part of that special character. There are also a larger number of Grade II Listed buildings and NDHAs which also derive part of their special interest from their association with the surrounding open

countryside – although not including such long-range views. However, they are sited closer to the development and the scale and appearance of the development will also encroach on their setting, diminishing part of their significance.

- 6.4 As individual heritage assets, it might be possible to justify the harm when balanced against the public benefit of the solar panels. But the cumulative impact is a fundamental consideration. The heritage assets have overlapping settings and historic interrelationships with each other and the historic landscape. Their value is intensified due to their number and grouping. The proposed development will therefore result in harm to a large number of heritage assets, which amounts to a significant level of heritage harm. This is why it is considered to be at the higher end of less than substantial harm, in terms of the test under the Framework.