

**WPC/2**

**Spurstone  
Heritage Ltd**

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**Appeal against non-determination by Telereal  
Trillium**

**Proposed development of the Former Wye College  
Buildings, High Street, Wye, Ashford, TN25 4AH**

**Appeal Reference: APP/E2205/W/20/3259450**

**Proof of Evidence of Kit Wedd**

**Spurstone Heritage Ltd**

**on behalf of**

**Wye with Hinxhill Parish Council**

**December 2020**

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## 1. Introduction

- 1.1 My name is Kit Wedd and I am the Director of Spurstone Heritage Ltd, a consultancy that provides independent advice on conservation and development of historic sites and buildings. Details of my qualifications and experience are set out at Appendix 1 (A1.1).

### Scope of evidence

- 1.2 This Proof of Evidence is written on behalf of Wye with Hinxhill Parish Council (WHPC) in relation to the appeal by Telereal Trillium (TT) against non-determination by Ashford Borough Council (ABC) of three planning applications for the wider former Wye Agricultural College campus (known as WYE 3). The evidence I will present on behalf of WHPC will be on heritage matters in relation to Appeal A:

- Former Wye College buildings, High Street, Wye, Ashford TN25 4AH (Ref. 17/00567/AS; PINS appeal Ref. APP/E2205/W/20/3259450)

Listed building consent for this scheme was granted with conditions on 24 June 2019 (Ref. 17/00568/AS).

Evidence in relation to wider planning matters will be presented by Mr Kevin Goodwin.

- 1.3 The description of development is as follows:

*“Conversion of former College buildings with associated restoration and alterations to buildings, demolition of later structures and rebuilding to provide 38 dwellings and community space; together with provision of 2 new dwellings, parking courts with car barns, cycle storage and refuse stores on land to the north of the retained buildings and associated landscaping; and change to parking arrangements for Squires Cottages.”*

- 1.4 The Appeal A scheme site (the Site) contains the following designated heritage assets:

- The medieval college of St Gregory and St Martin at Wye (scheduled monument)
- Wye College Cloister Quadrangle (listed Grade I)
- The Latin School (listed Grade I)
- The Wheel House (Junior Common Room) Walls and Gates Attached (listed Grade II\*)
- Wye College, Entrance and Hall Quadrangles (listed Grade II), and the Workshops within the curtilage.
- The southern part of the Site is within the Wye Village Conservation Area.

- 1.5 My evidence will show that the proposed development would harm the significance of the highly-graded listed buildings of Kemp’s College. It would also harm the significance of the Grade II-listed Wye College, and the Workshops within its curtilage. Even taking into account the heritage benefits of the scheme, there would be net harm to the significance of the designated heritage assets. The harm to the assets would be less than substantial harm (the term used in the NPPF), in various degrees.

- 1.6 The proposed development would also harm the significance of the Grade I-listed parish church and the Grade II-listed monuments within the churchyard, through changes to their setting. The harm would be less than substantial, at the low end of that scale.

- 1.7 It would also fail to preserve or enhance the character or appearance of the Wye Village Conservation Area.

- 1.8 I disagree with some of the conclusions reached by ABC and Historic England (HE) on the balance between the harm that the proposals would cause to significance and the heritage benefits they would provide. In my view, whilst the conclusions of the authorities, particularly HE, are generally to be respected, in this case they cannot be relied upon because the heritage information supplied with the application — on which their assessment was based — was inadequate.
- 1.9 Contrary to NPPF para. 189, the Applicant's heritage information does not adequately explain the significance of the heritage assets. In particular, it ignores the communal value that contributes greatly to the outstanding significance of Kemp's College. ABC and HE have therefore been unable properly to assess the impact of the proposals on the significance of the heritage assets, or to weigh the harm against the public benefits of the proposal, as required by NPPF para. 196.
- 1.10 This proof should be read with the appendices, particularly Appendix 1 where much of the detail of my analysis is to be found.



## 2. Evidence

- 2.1 The sources referred to are given in Appendix 1 (A1.7). The illustrations are in Appendix 2.

### The Appeal A Site

- 2.2 The Appeal A Site (the Site) is part of the former Agricultural College of Imperial College, London University, in the village of Wye within Ashford Borough Council (Figs 1 and 2). It covers an area of 1.01 hectares bounded to the north by the Guinness Laboratory, Jubilee Building and Science Buildings of the former College, to the east by Olantigh Road, to the south by the High Street and to the west by the churchyard of the parish church of St Gregory and St Martin, and the allotments north of the churchyard. The approximate centre of the Site is at Grid Reference TR 05520 46868.
- 2.3 A public footpath crosses the northern part of the Site from the north-east corner of the churchyard to Olantigh Road. The Guinness Laboratory, Jubilee Building and Science Buildings are north of the footpath; to the south are older buildings arranged in five quadrangles, and Workshops.
- 2.4 The south-west part of the Site is a scheduled monument — the medieval college of St Gregory and St Martin at Wye (Fig 3) — and contains an outstanding collection of listed buildings of fifteenth-century origin: Wye College Cloister Quadrangle, the Latin School (both Grade I), and the Wheel House (Junior Common Room) and attached wall and gates (Grade II\*) (Fig 4). Together these make up “Kemp’s College”.
- 2.5 Also within the Site but outside the scheduled monument are the late-Victorian and Edwardian Wye College Entrance and Hall Quadrangles (“Wye College”; listed Grade II), and the Wood and Iron Workshops within the curtilage.
- 2.6 All the listed buildings together constitute the “historic campus”.
- 2.7 The historic campus is within the Wye Village Conservation Area (Fig 5). The entire village is within the Kent Downs Area of Outstanding Natural Beauty.
- 2.8 The Guinness Laboratory of 1936, the Jubilee Building of 1977 and the other Science Buildings, of various post-war dates, are unlisted.
- 2.9 The north-east part of the Site includes a row of four unlisted houses known as Squires, on Olantigh Road. Built in 1904 as a terrace of four separate dwellings, these were latterly used as student accommodation but are now vacant.

### History

#### Kemp’s College

- 2.10 Further detail on the history of the site is included at Appendix 1 (A1.3).
- 2.11 In 1447 Cardinal Archbishop John Kemp (or Kempe; 1380–1453) built a chantry College at Wye to house a small community of secular priests who served as parish priests and provided free education to local poor boys.
- 2.12 The College layout was a quadrangle formed by the Hall, a Parlour wing to the north, a service wing to the south, and the churchyard wall to the west. South of these, in a looser quad layout open to the south, were a separate service building (the Wheel House) and schoolroom (the Latin School).

## Post-Dissolution

- 2.13 In 1545 the College was dissolved and in 1547 Henry VIII sold the estate to Walter Bucler, on condition that he and his heirs continued to provide free education to the boys of the parish.
- 2.14 The College was then held by a succession of private owners who made changes: a timber stair in the north range, panelling in the Parlour, and stone fireplaces in the Hall, Parlour and Latin School. They remained responsible for the continuation of the grammar school.

## The Charity Schools

- 2.15 In 1713 the College was donated to Lady Joanna Thornhill's Charity and subsequently enlarged to accommodate Boys' and Girls' Charity Schools, which superseded the grammar school. The cloister was rebuilt in brick, and the south range became the schoolmaster's house. The wall enclosing the garden was built in 1735. In 1849 the walls of the Wheel Room were rebuilt, the medieval roof being retained.

## The Agricultural College

- 2.16 In 1892 Kent and Surrey County Councils bought the College and extended the buildings to accommodate a new agricultural college. P.B. Chambers designed the first extensions, north of Cloister Quad (1892–5). South Eastern Agricultural College (SEAC) opened in November 1894 with 14 students.
- 2.17 The campus quadrupled in size in the next 20 years. The buildings erected between 1901 and 1914 were designed by T.E. Collcutt, at first working alone and from 1906 in partnership with S.H. Hamp. They include:
- Workshops (c. 1903) in the north-east part of the Site
  - The north range (1912)
  - The Entrance block on High Street, and east wing on Olantigh Road (1914).
- 2.18 In 1903 the Latin School was extended along its north side.
- 2.19 Later developments within the Site include:
- Squires (1904)
  - The Guinness Laboratory (opened 1935)
  - The Dining Hall (1953)
  - The Science Buildings (1960s).

## The Site today

- 2.20 Imperial College took over Wye Agricultural College in 2000. The campus was closed in 2008, and sold to TT in 2015.
- 2.21 Wye Heritage Centre continues to use the Latin School. Apart from this, the Site has been unoccupied and closed to the public since the Agricultural College left. It has suffered vandalism and theft, and deterioration due to lack of maintenance.
- 2.22 Planning permission and change of use of Squires from student accommodation to four dwellings was granted on 22 August 2016 (Ref. 16/00839/AS). The permission lapsed unimplemented in 2019, and this building too is deteriorating.

## Significance

- 2.23 Further detail on the architectural, artistic and historic interest, and communal value that contribute to the significance of the Site, and the methodology for assessing significance, are included at Appendix 1 (A1.4).

### Archaeological interest

- 2.24 The scheduling of the south-east part of the Site confirms that it contains archaeology of national importance.

### Historic interest

- 2.25 More detail on the historic interest of the site is given at Appendix 1 (from para. A1.4.20).
- 2.26 Kemp's College survives as a complete medieval chantry college. This is rare, and of great historic interest as it illustrates the arrangement and use of such institutions.
- 2.27 The College commemorates the interest and influence of John Kemp, senior churchman, adviser to Henry V and Henry VI, diplomat and statesman of international reputation. Born in Olantigh, he remained attached to Wye parish throughout his life.
- 2.28 Henry VI supported the founding of the College. The grammar school was integral to the College from the start, in a period when many important educational foundations were established. It was protected by Henry VIII and subsequently maintained by private owners. Thus from 1447 until 2008 the grammar school, Charity Schools and Agricultural College kept the Site in continuous educational use.
- 2.29 The Agricultural College was an internationally important institution. Its research led to discoveries in agricultural science and innovations in farming, particularly in soil science and the cultivation of fruit and hops. Distinguished Principals and staff produced standard texts, and their students carried knowledge acquired at Wye across the world.
- 2.30 The Site's connections with important people and its long history of continuous educational use give it exceptional historic interest.

### Architectural and artistic interest

- 2.31 More detail on the architectural and artistic interest of the site is given at Appendix 1 (from para. A1.4.25).
- 2.32 The Cloister Quad and the Latin School are listed Grade I in acknowledgement of their exceptional interest. The Wheel House is Grade II\*, denoting its more than special interest. HE confirms that *"This group of buildings is of outstanding significance for its architectural interest and for the ways in which its rare and unusually well-preserved fabric illustrates the arrangement and use of a fifteenth-century chantry college."* (HE 26 May 2017, p. 1; Appendix 4)
- 2.33 The Lecture Theatre and other extensions by Chambers, and the buildings added 1901–14 by Collcutt & Hamp, are historical revival designs in keeping with the medieval origins of Kemp's College. Collcutt & Hamp's designs express Arts and Crafts principles, and are carefully detailed. Grade II listing confirms that these buildings are of special interest, warranting every effort to preserve them.
- 2.34 The Workshops within the curtilage of the Grade II listed building are functional buildings in vernacular revival style appropriate to the practical activities they housed. The yard in front of them, enclosed when Agricola Quad was completed in 1912, has been infilled with extensions of no architectural interest.

- 2.35 The Guinness Laboratory is a single-storey brick building with a steeply-sloping tiled roof. Its materials and faintly Arts-and-Crafts character link it to the earlier buildings and give it minimal architectural interest.
- 2.36 The Science Buildings and Jubilee Building (1977) have no architectural interest.
- 2.37 No buildings have been formally identified as non-designated heritage assets (locally listed buildings). However, Squires has a distinct historic character in keeping with the vernacular architecture of the locality, which gives it some architectural interest.

### Communal value

- 2.38 More detail on the communal value of the site is given at Appendix 1 (from para. A1.4.44).
- 2.39 HE's *Conservation Principles* identifies a type of interest that contributes to significance, in addition to those mentioned in the NPPF: communal value. (HE 2008, pp. 7, 31) The fundamental influence of Kemp's College and the Agricultural College on the spiritual, economic and social life of Wye demands that special attention be paid to this aspect of significance.
- 2.40 The priests of Kemp's College served the community as parish priests and schoolmasters. They employed local people, and had tenants in properties on their large estate. Thus from its foundation the College has been central to village life.
- 2.41 The schools served generations of Wye families, and their successor institutions still thrive. The subsequent presence of the Agricultural College was a source of community engagement and local pride. Its students — many of them from Commonwealth countries — supported the local economy and its resident staff were active members of the local community.
- 2.42 The Agricultural College has had a profound influence on the growth of the village and the character of its surroundings. It owned and actively cultivated a large area of farmland north and east of Wye. The Wye Crown landmark was cut into the chalk of Wye Down by College students in 1902 and restored by their successors in 1990–5. Successive phases of expansion have led to development of the campus along Olantigh Road.
- 2.43 The College housed civilian volunteers during both World Wars, and was a Divisional HQ from 1939. Cloister Quad contains memorials to College staff and students who died in both wars.
- 2.44 By custom and tradition the College hosted events that were central to the lives of Wye residents. The Chapel was (re)consecrated in 1997. It is an approved venue for marriages, and until 2008 there were regular wedding receptions. At other times it was available for services or quiet contemplation.
- 2.45 The College hosted residential summer schools, and the U3A and WEA held day courses in the Latin School. Wye Heritage Centre opens the Latin School to the public twice a month.
- 2.46 For centuries, the College buildings have been an integral and central part of the social infrastructure of Wye. Village residents benefitted from College facilities and had “freedom to roam” informally through the gardens and green spaces. The closure of the College and its facilities was a body blow to community life in Wye. (WHPC December 2020, para. 25).
- 2.47 This close relationship has profoundly affected the local community, making Wye a “miniature university town”. (Wye Village Design Group 2000, p. 7) Communal value adds greatly to the significance of the historic campus as a whole, and particularly to the **outstanding significance** of Kemp's College.

## Summary of significance

- 2.48 The significance that the Site derives from its historic, architectural, artistic and communal interest may be summarised as follows:
- Cloister Quad, the Latin School and the Wheel House: **outstanding significance**
  - Wye College Entrance and Hall Quadrangles: **high significance**
  - Workshops within the curtilage of the Grade II listed building: **moderate significance**
  - Guinness Laboratory: **low significance**
  - Squires: **low significance**
  - Science Buildings: **neutral significance**
  - Workshops yard infill buildings: **detract from significance**.

## The setting and its contribution to significance

- 2.49 Each designated heritage asset within the Site forms part of the setting of the others: change to one has the potential to affect the significance of all.

### Immediate setting

- 2.50 The immediate setting of the Grade I- and II\*-listed buildings of Kemp's College is tightly defined by the surrounding quads and walls to the churchyard and High Street. Beyond the formal High Street entrance it has the instantly recognisable collegiate character of an enclosed environment with a peaceful atmosphere and sense of order. The quads are linked by their domestic scale, similar architectural character and shared palette of local materials. Doorways and passages give glimpses from one space to the next (Fig 6).
- 2.51 The Workshops have a functional character and the Workshops yard (when not enclosed by security fences) has an informal approach from Olantigh Road; this broadens the context in which the rest of the historic campus can be understood.
- 2.52 The Guinness Laboratory was the first extension of the Agricultural College north of the public footpath, and its traditional architecture and materials make a visual link with the older buildings. It marks an important corner of the Site where three footpaths meet at the north-east corner of the churchyard.
- 2.53 The Jubilee Building and Science Buildings date from the late twentieth century. They have negligible architectural quality, but do express the continuing development of the college in the twentieth century and help to enclose the wider college campus.
- 2.54 Squires makes a positive contribution to the setting of the Wye Village Conservation Area.

### Intermediate setting

- 2.55 The intermediate setting is rich in designated heritage assets. The parish church (Grade I) and churchyard, which contains six listed monuments (all Grade II), provide a tranquil green foreground in views eastward to the College. To the south are open streets lined with jostling house fronts, including more than 70 listed buildings, all within the conservation area.
- 2.56 Within the Wye Village Conservation Area, the dense urban grain of development in the medieval centre contrasts with the parish church, solitary in its spacious churchyard. The College precincts express a third, distinctive, enclosed form of development that makes a unique contribution to the urban morphology.
- 2.57 The Conservation Area influences the way in which the listed buildings of Wye College are experienced, through contrasts of scale, grain and architectural character. Other attributes of

the setting that might contribute to significance are hard to assess at present, while the buildings are vacant and unused; however it is reported that until the Agricultural College departed, there were strong cultural associations, activity, and a high degree of accessibility between the College and its setting. (WHPC December 2020)

### Wider setting

- 2.58 The wider setting includes unlisted twentieth-century buildings on Olantigh Road and open country to the north. A focal point in the view northward is Wye Court (listed Grade II), which sits within the open landscape of the Great Stour valley, ringed by wooded hills, in the Kent Downs AONB.
- 2.59 The North Downs Way and several public footpaths pass through Wye. The College is an important landmark on these routes. From the Wye Crown, 1.5km east of Wye, the village can be seen across farmland that formerly belonged to the College, and this setting contributes to understanding of the heritage assets.

### Other aspects of setting

- 2.60 GPA3 advises that in assessing the contribution of setting to significance, the asset's intangible associations with its surroundings, and patterns of use should also be taken into account. (HE 2017, para. 26) Until the College closed, its historic buildings were intensively used by local people as well as the academic community, and this busy interaction was part of the setting's contribution to the significance of the college.

## The proposals and their impact on significance

### The proposals for Kemp's College

- 2.61 The Appeal A Scheme proposes dividing Kemp's College into three separate, private dwellings: the south range of Cloister Quad would become proposed Unit 18; the upper part of the north range proposed Unit 32; the Wheel House proposed Unit 20. The garden would become a private garden and the Latin School a "garden room" for proposed Unit 18. The change of use entails alterations to the historic fabric of Cloister Quad that would harm significance:
- Separation of the Inner Parlour from the Jacobean Stair compartment
  - Separation of the Parlour from the Solar (within proposed Unit 32)
  - Separation of the south range from the west range at first floor between proposed Units 18 and 32.
  - Removal of substantial amounts of seventeenth-century fabric to reveal part of the medieval roof over the area that was once an open dormitory on the first floor of the north range
  - Alteration to the Jacobean Stair compartment to provide separation from proposed Unit 32.
  - Potentially, loss of medieval fabric.

These proposals would produce three types of harmful impact.

- 2.62 First: there would be harm in principle from the proposed subdivision of the Grade I listed building. Kemp's College was built as a single entity with a single corporate purpose, which remains evident in the continued integration of the Cloister Quad, Wheel Room and Latin School. The Schedule entry (Appendix 4) makes clear that the integrity of the Cloister Quad and interrelationship of these three buildings, preserved since 1447, is fundamental to its outstanding significance and to our understanding of that significance.

- 2.63 The medieval College — preserved intact for more than 570 years — would be dis-integrated. Permanent and irreversible barriers would be made between areas never before separated. The proposals would disrupt the historic plan, inhibit circulation, and diminish the legibility of the historic form. The hierarchy of interrelated uses would become illegible and no longer capable of being experienced. The historic links between Cloister Quad, the Wheel House and the Latin School would be broken.
- 2.64 The proposal would permanently and (once the units are sold) irreversibly subdivide Kemp's College into three separate dwellings. It would permanently sever the physical and functional connection between the Cloister Quad, Wheel Room and Latin School.
- 2.65 Second: public access to and use of the Grade I and Grade II\* listed buildings and garden would end. The historic character of the College as a porous semi-private / public space would be lost. The access, security and privacy required for the proposed residential use impose such severe restrictions on access as would reduce the communal value of Kemp's College to an almost negligible level.
- 2.66 The continuous chain of educational uses — including the education of the local community — would be broken. That use is fundamental to the significance of the place, and to the understanding of that significance. Residential use, at least in the form proposed, would preclude the possibility of finding a meaningful new educational or other community use and local people would lose, for ever, the benefit of using and appreciating their college, which they enjoyed as the founder intended until 2008.
- 2.67 The third type of harm concerns the proposed physical changes to the listed buildings. Historic fabric would be altered or demolished in areas highly sensitive to change. In particular, the removal of seventeenth-century fabric in the upper part of the north range would destroy evidence of the building's historical development and the respective status of different spaces. The Jacobean Stair compartment would be altered. The proposed exposure of the medieval roof is contrary to best conservation practice: it would destroy authentic historical evidence in order to achieve an incomplete reconstruction of the late-medieval building.
- 2.68 These proposals would cause less than substantial harm (at the highest end of that scale) to the significance of Kemp's College.

### The proposals for Wye College and the Workshops

- 2.69 The scheme proposes converting the Grade II-listed buildings into private dwellings. This includes the following proposals that would harm significance:
- Horizontal and vertical subdivision of the Dining Hall to create two private dwellings.
  - Demolition of the Workshops wings and their replacement with "car barns".
  - Use of the Workshops yard (following removal of infill extensions) as private gardens and a large area of car parking in the setting of the Grade II listed building.
- 2.70 The Dining Hall is *"a splendid building comprising a large open hall with an exposed hammer beam vaulted roof and large banks of windows ... essentially a modern interpretation of the Great Hall, both in the grandeur of its architecture and its function as a refectory."* (ABC 20 June 2018; 17/00568/AS, para. 68). The proposed subdivision would destroy the open volume of the hall, diminishing its architectural interest and making its historic function illegible. I agree with ABC's assessment that *"imposition of a conventional modern residential layout on an unconventional building such as this, shows a disregard for its architectural value. Although small areas are to be kept open to the roof, this is inadequate to preserve the open volume of the hall."* (ABC 20 June 2018 / 17/00568/AS, para. 68). This would harm the significance of the Grade II-listed building, and the significance of the historic campus as a whole.



- 2.71 While most of Wye College lends itself readily to residential conversion with little internal impact and negligible exterior impact, the Dining Hall does not. This is the obverse of the proposals for proposed Unit 32: there, harmful alterations are proposed in order to partially reinstate an internal volume and reveal a timber roof; here, harmful alterations would destroy an intact internal volume and conceal a timber roof. Perhaps this should not cause surprise, as sustaining the significance of the listed buildings is not among the “basic principles” set out in the *Design Principles Report* that accompanies the application. (Hobbs Parker April 2017, p. 3) Far from following a consistent conservation strategy, these proposals for both these spaces represent a cavalier disregard of significance in pursuit of maximum profit.
- 2.72 The committee report identifies precisely that it is “*the imposition of a conventional modern residential layout*” that would be harmful. A more considered design that responds creatively to the particular character of this building could be acceptable.
- 2.73 The proposed demolition of the Workshop wings would remove approximately 80% of the building. Among the earliest structures to be built in the Edwardian phase of expansion designed by T.E. Collcutt, the Workshops were essential to the delivery of the practical farming part of the Agricultural College curriculum. Their layout, scale, massing and architecture are very different to those of the formal quads, and the contrast is instructive. Their vernacular revival design is an interesting counterpoint to the “polite” character of the quads. The proposed demolition would diminish the architectural interest of the Workshops themselves and of the College, and would destroy evidence of the history and use of the Site.
- 2.74 The proposal would also remove the possibility of finding a beneficial new use for the Workshop wings, in accordance with Policy WNP6 of the Wye Neighbourhood Plan, which calls for the Site to be developed with a mix of uses, including business.
- 2.75 The proposal for rebuilding the north external elevation of Agricola Quad following removal of the kitchen extension would not replicate the original fenestration, but places windows where convenient for the altered internal arrangement, including French windows not found in the original designs, to give access onto private gardens. ABC identified this as a missed opportunity, but accepted it because “*the planning application for the kitchen extension did not include existing elevations, so any ‘reinstatement’ of the lost fenestration pattern would be subjective.*” (ABC 20 June 2018 17/00568/AS, para. 71) This overlooks survey plans of 1934, which show the size and disposition of the windows. (CAT 2017, pp. 109 and 110) These, and the surviving windows, provide compelling evidence for accurate restoration of this elevation.
- 2.76 The proposed demolition of the extensions in the Workshops yard would provide opportunities to restore Collcutt’s design, re-establish the historic relationship between the Workshops and the quads, and restore the setting of both, to better reveal the significance of these parts of the historic campus. However, rather than seize these opportunities, the scheme proposes to rebuild the elevation with inaccurate fenestration, re-enclose part of the reclaimed yard for private gardens and dedicate the rest to a car park. This would urbanise the setting, and degrade in particular the setting of the west range of North Quad.
- 2.77 These proposals would cause less than substantial harm (at the upper end of that scale) to the significance of Wye College.

### Impact of the proposals on the conservation area

- 2.78 The proposed use of the Workshops yard as private gardens and car park would introduce a large area of car parking into the Wye Village Conservation Area, in the north-east corner of the conservation area, where it would be highly visible from Olantigh Road. There are no car parks in the conservation area, and such use forms no part of its character or appearance.



- 2.79 The fences or walls for the proposed private gardens would screen the rebuilt / restored north elevation of the east range of Agricola Quad, meaning that the contribution made by this part of the Grade II-listed building to the character or appearance of the conservation area could not be appreciated.
- 2.80 The introduction of the car park into the Wye Village Conservation Area would harm significance by failing to preserve the character or appearance of the conservation area. The harm would be less than substantial, in the middle of that scale.

#### Impact of the proposals on the setting

- 2.81 It is proposed to demolish the buildings north of the public footpath and replace them with two new houses, two “car barns” and a car park.
- 2.82 Clearing this part of the site would remove evidence of the scale and presence of the former Agricultural College within Wye, but since the Guinness Laboratory has limited architectural and historic interest and the Science Buildings have none, any harm to significance from the loss of these buildings would be negligible.
- 2.83 This part of the Site is highly visible from the churchyard and public footpaths. The proposed redevelopment consists of two houses in an atypical layout linked by carports and overlooking a car park. The design of the proposed houses is blandly suburban, incorporating large windows and a fully-glazed gable that will be visible from some distance, and particularly obtrusive when lit from within during hours of darkness.
- 2.84 The proposals would suburbanise the setting of the listed College, church and monuments, and the conservation area, and cause less than substantial harm to the significance of these heritage assets, at the low end of that scale.

#### Impact of the proposals on communal value

- 2.85 As explained at 2.37–2.45 above, communal value makes such an important contribution to the significance of the Site that the impact of the proposals on this aspect of significance requires special consideration.
- 2.86 The proposals for Kemp’s College, include some “communal” and some “community” space. It should be noted that “communal” is used in HE’s *Conservation Principles* to define value that contributes to significance for “*the people who relate to [a place], or for whom it figures in their collective experience or memory*”. (HE 2008, p. 7). This is different from its use in the application documents, where “communal” refers to the interests and activities of residents of the proposed private housing.
- 2.87 “Communal” in the application means that use of the Hall, Parlour, Inner Parlour, Jacobean Stair and Lecture Theatre would be restricted to occupants of the development. Public access to these spaces would be granted on a very limited basis, by prior arrangement in writing with a management company (yet to be identified) for the residential complex.
- 2.88 It is not clear how access would be provided to the minstrels’ gallery (the application plans show it within proposed Unit 32).
- 2.89 The Chapel would be used only for the purposes of public worship (two services per week).
- 2.90 The proposed “community” space would be provided by moving Wye Heritage Centre 35m to the east, from the Latin School to a building of less historic interest, the 1903 Servants’ Hall adjoining the Wheel House. This would be available for use by Wye Heritage and other interested local history groups, as agreed in writing with ABC.

- 2.91 There would be no public access to the south range, the first floor of the north range, the Latin School, the Wheel House or the Garden. A proposed “public heritage access programme” would give public access to the Great Hall, Jacobean Stair, Parlour, Lecture Theatre and war memorials for up to four hours per month, by appointment. The Chapel would be available for a minimum of two services a week. There would also be “*an annual heritage open day of up to 6 hours duration*”. (ABC 20 June 2018 17/00567/AS, para. 13)
- 2.92 These proposals would affect communal value through:
- Dis-integration of Kemp’s College by conversion to three separate, private dwellings.
  - Stringent restriction of public access to and use of the Cloister Quad
  - Stringent restriction of public access to and use of the Chapel and the War Memorials
  - Loss of public access to and use of the Latin School.
  - Loss of public access to and use of the Garden.
  - Loss of the educational use of the Site.
  - Loss of opportunities for employment, community and education uses in Kemp’s College that would sustain the important historic connection between the college and the village community — which made Wye a “miniature university town”.
  - Privatisation of the entire historic campus, which would effectively become a gated community.
- 2.93 The proposed arrangements for pre-arranged public access to a small part of Kemp’s College are extremely restrictive in comparison with the liberal community use of the college permitted until 2008. They might almost have been designed to discourage community use and seem certain eventually to loosen the practical, functional and emotional ties that bind Kemp’s College to the collective experience and memory of local people.
- 2.94 The historic campus is a major landmark in the Wye Village Conservation Area. Until it closed, the College was intensively used by local people as well as the academic community, and this busy interaction with the village was part of its contribution to the character of the conservation area. The proposed development would create effectively a gated community of private houses and apartments — a type of development alien to the village and inimical to community cohesion, which would fail to sustain the character of the conservation area.
- 2.95 Furthermore, the proposal would create what is effectively a gated community with very limited public access. This would rob Wye of its character as a “miniature university town” and of the vitality within the High Street that goes with that, causing harm to the character of this part of the Wye Conservation Area.

## The balance of harm and benefits

### Clear heritage benefits of the proposals

- 2.96 Some of the proposals for Kemp’s College would provide heritage benefits:
- Restoration of the Jacobean stair and reinstatement of the ‘Ancient Britons’
  - Removal of the partition, to restore the original plan and proportions of the Solar
  - Removal of the bar from the interior of the Wheel Room.
- 2.97 Some of the proposals for Wye College would provide heritage benefits:
- Conversion of the Grade II listed ranges (excluding the Dining Hall) to a viable new use as housing.
  - Removal of the twentieth-century extensions in the Workshops yard.

## Questionable heritage benefits of the proposals

- 2.98 It is not straightforward to assess the proposal to remove a seventeenth-century attic chamber and partially reveal the medieval roof in the north range of Kemp's College (an idea proposed by HE during consultation). The roof is splendid and was designed to be seen, so there would be some benefit in partially revealing it. However, the proposal has harmful aspects:
- Loss of genuine historic fabric that is evidence of the authentic history of the place
  - Potential to damage or destroy medieval fabric along with seventeenth-century fabric
  - Alteration of the Jacobean Stair compartment to provide separation from proposed Unit 32
  - The work would not accurately reinstate the late-medieval condition of the building.
- 2.99 The committee report on the listed building consent application contains a thoughtful weighing-up of the philosophical considerations. (ABC 20 June 2018 17/00568/AS, paras. 58–61) The relevant extract is at Appendix 6.
- 2.100 I have considered the proposal against the guidance on “Restoration” in *Conservation Principles*, which includes (HE 2008; para. 13):
- “Restoration to a significant place should normally be acceptable if:*
- a. the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost* (Yes; the medieval roof is has more architectural and artistic interest than the seventeenth-century fabric)
  - b. the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence* (No; the evolution and fabric are not fully understood, and the proposed work would destroy evidence of the evolution of the place)
  - c. the form in which the place currently exists is not the result of an historically-significant event* (not applicable)
  - d. the work proposed respects previous forms of the place* (No; it would not reinstate the late medieval condition of the building, but would destroy the seventeenth-century spatial hierarchy and alter the Jacobean Stair compartment)
  - e. the maintenance implications of the proposed restoration are considered to be sustainable* (Not known; no information provided with the application).
- One positive answer out of a checklist of five questions shows that the proposal does not meet HE's acceptability test.
- 2.101 An additional concern is that insufficient attention has been paid to the design of this major change in one of the most sensitive parts of the medieval college, and too little information is provided to enable the impact to be assessed. Too many matters that should be addressed in the application are left to be resolved by conditions attached to any planning permission.

2.102 Such intrusive works to a Grade I listed building of outstanding significance should be designed with great care. The application includes a demolition drawing for the first floor and a proposed plan (dwgs. nos. 2742-91 Rev A and 2742-90 Rev A), but I see little evidence of the design's having been developed beyond the initial concept proposed by HE. For example, no information has been provided on matters such as:

- Structural assessment of the proposal, including the capacity of the first floor of the historic structure to support internal scaffolding
- Strategy for dealing with the historic ventilation system within the attic
- Method statement for demolition of the seventeenth-century fabric
- Strategy for dealing with unexpected discoveries during the course of work (e.g. medieval fabric encapsulated or reused in seventeenth-century fabric)
- Specification of materials and techniques for repairing the medieval roof
- Thermal insulation of the roof to meet modern residential standards; interface of insulation with medieval timber and underside of roof covering
- Specification for cleaning the exposed timber, and any finishes to be applied
- Detailed design of alterations to the Jacobean Stair compartment.

2.103 It may be that some of these matters can be satisfactorily dealt with by condition. However, the lack of evidence that due consideration has been given to *any* of them, should sound an alarm. Based on my experience of similar projects (which includes advising on *The Canterbury Journey* project at the Cathedral and medieval houses within its precincts, and, currently, alterations to the Grade II\*-listed medieval parish church in Teddington), I believe there simply is not enough information here to enable a proper assessment of the impact of this proposal.

2.104 The medieval roof would be within a private residential flat (proposed Unit 32), to be enjoyed by the occupants of that flat. There would be no public access, even under the stringent restrictions applied to accessing the “communal” spaces elsewhere in the north range.

2.105 The committee report on the listed building consent application describes the retention of the Lecture Theatre (as “communal” space) as “heritage gain”. (ABC 20 June 2018 17/00568/AS, para. 65) The retention of this significant part of the Grade II listed building is certainly welcome; however, I do not regard the absence of a proposal to convert it as conferring a fresh benefit: it is merely maintaining the existing building, while restricting public access to it.

2.106 The proposals include refurbishment and repair of the fabric. (Hobbs Parker April 2017, para. 6.12). This should not be regarded as a benefit carrying any material weight: any responsible custodian of such important historic buildings should undertake routine repairs and maintenance as a matter of course, and private residential use is not the only use that might trigger more comprehensive refurbishment.

### The balance of harm and benefits

2.107 The benefits of the proposals in the Appeal A scheme listed at 2.90 and 2.91 are genuine heritage gains, which are welcome (albeit the benefit of clearing the Workshops yard would be immediately obviated by the proposed use as private gardens and a car park). However, the ability to carry out these beneficial works does not depend on conversion to private dwellings rather than another use.

2.108 Several proposals would harm the significance of the designated heritage assets, as described at 2.61–2.95. It is not only the number of proposals that would be harmful, but also their location in highly sensitive areas, the high level of their impact, the dis-integration of Kemp's College and the loss of public access to and use of Kemp's College.

2.109 Taking into account the heritage gains of the Appeal A scheme, I consider that there would be net harm to the significance of the heritage assets:

- The net harm to Kemp's College would be at the very highest level of less than substantial harm
- The net harm to Wye College and the Workshops would be at the upper level of less than substantial harm
- The net harm to the Wye Village Conservation Area would be less than substantial, in the middle of that scale
- The net harm to the listed buildings through changes to their setting would be less than substantial, at the low end of that scale.

2.110 Although the degree of harm to both parts of the historic campus is similar, they should not be treated equally. NPPF para. 193 states: *"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)"* (my emphasis). The outstanding significance of the Grade I and II\* buildings requires that greater weight should be given to the harm that these proposals would cause to their significance.

### The Appellant's heritage information

2.111 More detail on this aspect of the application is at Appendix 1 (A1.5).

2.112 I have identified in-principle harm from the proposed dis-integration of the Kemp's College and loss of community access to and use of the Site — matters that HE did not address. I have also taken a more cautious view of the proposals for the north range, and given more weight to the negative impacts of the proposals for the Workshops and the northern part of the Site. This divergence of opinion can be accounted for by the additional information that I have gathered independently of that provided with the application.

2.113 The heritage information supplied in support of the Appeal A Scheme was insufficient because it did not acknowledge the significance of the survival of Kemp's College as an integrated whole; it did not acknowledge communal value as a contributor to significance; it paid insufficient attention to the Workshops within the curtilage of the Grade II-listed building.

2.114 The *Historic Buildings Assessment* identifies and describes each building within the Site. (CAT March 2017) However, and crucially, it does not assess their significance in terms of the types of interest identified in the NPPF, *Conservation Principles* or any other methodology, and does not assess the impact of the proposals on significance.

2.115 Other "heritage" documents submitted with the application similarly fail to assess significance or discuss the heritage impact of the proposals.

2.116 ABC and HE were therefore in no position properly to assess the impact of the proposals on the significance of the heritage assets that would be affected by them, contrary to NPPF paras. 189 and 190. The practical effect of this is that the assessment was undertaken, and listed building consent (Ref. 17/00568/AS) was granted on the basis of inadequate information.

### Historic England's advice

2.117 Further detail on this aspect of the application is included at Appendix 1 (A1.6).

2.118 HE's advice to ABC contains an apparent internal contradiction. It ascribes the outstanding interest of Kemp's College partly to *"the ways in which its rare and unusually well-preserved fabric illustrates the arrangement and use of a fifteenth-century chantry college."* (HE 26 May

2017, p. 2 full para. 2) “Arrangement and use” must refer to the integration of all parts of the college into a single, coherent whole. However, HE also state their support in principle for the proposed conversion of the college to residential use — which, in this case, would cause its dis-integration through separation into three private dwellings.

- 2.119 HE also state: *“We think that the balance of impacts in this case could result in a net positive effect on the significance of the listed building, meaning that paragraph 134 of the NPPF would not need to be applied”* (HE 26 May 2017, p. 6 full para. 1; Appendix 3. Note: NPPF 2012 para. 134 became NPPF 2019 para. 196, retaining the same wording.)
- 2.120 I argue that the net effect would be negative. My view may differ from that of HE on the application of conservation philosophy. However, to focus solely on the physical interventions, and the impacts (positive and negative) that these would have on the architectural and artistic interest of discrete elements, is to ignore the harm caused by dis-integration of Kemp’s College and loss of communal value.
- 2.121 The deficiencies in the heritage information submitted with the application (Appendix A1.5) meant that when HE were undertaking their assessment they were not informed — or at least not fully informed — of the interests and values which contribute to the significance of Kemp’s College. Their attention was not drawn to the communal value. The vacant and disused condition of the buildings makes it hard to appreciate the harm that would follow the loss of the community’s access to and use of the College. This may account for HE’s willingness to accept severely restricted public access to a limited part of the Site.
- 2.122 I also take a more cautious view of the proposed removal of seventeenth-century fabric to reveal the medieval roof in the north range. This entails removal of seventeenth-century fabric, and there is no public benefit to balance the harm to significance that this would cause.

### Heritage planning policy

- 2.123 Policies and guidance referred to in this evidence are set out in Appendix 3.

### NPPF

- 2.124 Contrary to NPPF para. 189, the information supplied by the Appellant in support of the proposals for the designated heritage assets was not proportionate to the assets’ importance, or sufficient to enable ABC and their advisers to understand the potential impact of the proposals on the assets’ significances.
- 2.125 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). (NPPF para. 193) The outstanding significance of the listed buildings of Kemp’s College gives them great weight in the balanced judgement to be made in this case.
- 2.126 The impact assessment should not simply consider physical changes to the historic fabric: the integrity of Kemp’s College, its communal value to the people of Wye, and enjoyment by future generations, are all at risk from the proposed development.
- 2.127 My heritage impact assessment demonstrates that the development proposals for the Appeal A Site would cause less than substantial harm at the highest end of that scale to the outstanding significance of the highly-graded heritage assets of Kemp’s College.
- 2.128 The proposals for the Dining Hall and Workshops would cause less than substantial harm at the highest end of that scale to the high significance of the Grade II-listed Wye College.



2.129 In net terms, the harmful impact of the proposals weighed against the heritage benefits would be harmful, as follows:

- The net harm to Kemp's College would be at the very highest level of less than substantial harm
- The net harm to Wye College and the Workshops would be at the upper level of less than substantial harm
- The net harm to the Wye Village Conservation Area would be less than substantial, in the middle of that scale
- The net harm to the listed buildings through changes to their setting would be less than substantial, at the low end of that scale.

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. (NPPF para. 194)

2.130 There are several heritage benefits that would flow from the proposals. In summary these are restoration of the Jacobean Stair, the Solar and the interior of the Wheel Room in Kemp's College. The proposed conversion of Wye College (except the Dining Hall) to housing would also be beneficial. The harm and heritage benefit of the proposed partial restoration of the medieval roof of the north range is more finely balanced. However, it is not necessary to convert Kemp's College into private dwellings to achieve these benefits (or potential benefits). The use and enjoyment of the renovated and adapted listed buildings would be exclusive to the residents of the private housing.

2.131 The harm should be weighed against the public benefits of the proposal. (NPPF para. 196) It is for others to undertake this balance, taking into account the impact of the proposals for all three appeal schemes across WYE 3 as a whole.

2.132 The proposal to partially reveal the medieval roof of the north range would be a benefit exclusively enjoyed by the occupants of proposed Unit 32. There would be no public access, even under the stringent restrictions applied to access to the "communal" spaces elsewhere in the north range.

2.133 The "community" access and use offered are negligible in comparison with those that the people of Wye have enjoyed in one form or another since 1447, and the proposed restrictions constitute additional harm rather than benefit.

2.134 "Public benefits" includes, where appropriate, securing the optimum viable use of the heritage assets. (NPPF para. 196) NPPG advises: *"If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset [...] The optimum viable use may not necessarily be the most economically viable one [...]"* (Para. 015 Reference ID: 18a-015-20190723)

2.135 The conversion of Wye College into housing is an appropriate and beneficial use that would cause least harm to the significance of the asset (excluding the current proposals for the Dining Hall). However, the conversion of Kemp's College would cause the highest level of less than substantial harm. The dis-integration of Kemp's College, and the restrictions in terms of public access, show that residential use — at least in the form proposed — is not the optimum use. The Appellants have not demonstrated that their proposal is the optimum viable use — i.e. that out of the range of economically viable uses, this is the one that would cause least harm to the significance of the asset. It follows, therefore, that if there are other viable uses for the Site that would not cause this degree of harm, they should be preferred.

- 2.136 The Appellant has not demonstrated that the redevelopment of the College buildings (with an element of residential use) could not come viably forward in a less harmful manner, incorporating residential use in the parts of the Grade II listed building that can accommodate it without harm to significance, but avoiding the dis-integration of Kemp's College and retaining a greater degree of public access to the highly-graded listed buildings.
- 2.137 The absence of such viability evidence is also relevant to the question of whether there is a "clear and convincing justification", as required by NPPF para 194.

#### Ashford Local Plan policies

- 2.138 The proposed residential use of Kemp's College would not be "sensitive" or "appropriate", as required by ABC Local Plan Policy ENV13.
- 2.139 The proposals for the Workshops, the Workshops yard, and the area north of the public footpath would harm the conservation area and its setting, contrary to ABC Policy ENV14, which requires development or redevelopment within Conservation Areas to preserve or enhance the character and appearance of the Area and its setting.
- 2.140 The redevelopment of the northern part of the Site with new housing is not harmful in principle, but the design of the proposed new housing and car parking in the Appeal A Scheme would not preserve or enhance the character or appearance of the conservation area.

#### Wye Neighbourhood Plan policies

- 2.141 Policy WNP2: "[...] *Applications proposing unsympathetic designs which fail to respect the connections between people and places [...] will be refused.*"

The designs for the Grade II listed building (excluding the Dining Hall) are sympathetic, and would have little impact on the connection between the village and the College. However, the designs for Kemp's College, the Dining Hall and the Workshops are unsympathetic to the heritage significance of the place, and in particular would destroy the historic connection between the people of Wye and Kemp's College.

- 2.142 The WNP envisages the redevelopment of WYE 3 with a mix of uses. Policy WNP11 is a site-specific policy for WYE 3, which seeks *"the positive re-use of the Grade 1 and Grade 2 listed, and other unused Edwardian buildings of the former Wye College by a mix of community, residential and business uses."* That mix is missing from the Appeal A scheme, which would provide only private housing.
- 2.143 The policy also states that *"Small scale B1 use, live/work units and some residential change of use would also be supported here to encourage the development of a thriving community hub in these historic buildings in the heart of the village."* The proposed exclusively residential development, effectively a gated community, would be the opposite of "thriving community hub". However, the Workshops wings would lend themselves readily to use as business premises, including workshops (the purpose for which they were originally designed). They are conveniently located, with good access and useful yard space. Quite apart from the harm that the proposals would cause to significance, it seems perverse to demolish these attractive, well-built workshops, squandering the materials and energy they embody, simply to build similar structures ("car barns") on the same footprint.

#### Summary conclusion

- 2.144 In my view, it is necessary, when reaching a judgement in this case, to have regard to the high level of less than substantial harm that would be caused to the outstanding significance of the



highly-graded heritage assets of Kemp's College, as well as to the significance of the Grade II-listed building.

- 2.145 The harm would not be confined to the proposed changes to the physical fabric. Kemp's College is a single entity, designed for communal living and working. Subdividing it into three separate private dwellings would harm, and diminish understanding of, its significance.
- 2.146 Once the property has been sold off in parcels to the owners of the proposed individual dwellings, it will be impossible to reassemble the Site as a freehold property or on a single long lease. The proposals would subdivide, permanently and irretrievably, a collection of highly-graded listed buildings that was built as a single entity with a corporate purpose. The integrity of Cloister Quad is fundamental to the outstanding significance, and to the understanding of that significance, of Kemp's College as a whole.
- 2.147 The proposals would sever, permanently, the physical and functional connection between the Cloister Quad, the Latin School, and the Wheel House. The Latin School and Wheel House are not mere satellites to the principal building; they are contemporary structures vital to the realisation of Kemp's plan for an integrated College and grammar school, and the combined access and interrelated functions of the three buildings contribute to the outstanding significance, and to the understanding of that significance, of Kemp's College as a whole.
- 2.148 The communal value of the Site is extremely high. This outstanding collection of listed buildings has been closely woven into the life of the community. One way and another, Kemp's College and particularly the Latin School have served the parish and people of Wye for more than 570 years. For some time the parish church office was in the Main Quad. The College provided venues for concerts, weddings, functions and meetings. There are two war memorials that should be a focus for public commemoration and remembrance. The proposals would effectively privatise buildings that have served the public for 570 years and place high barriers in the way of the community's use and enjoyment of the highly-graded heritage assets.
- 2.149 The Latin School was an integral part of the College from the start. Its recent designation as an Asset of Community Value merely formalises a long-existing relationship that is greatly valued by the people of Wye. It is worth recalling that the Latin School provided education, free of charge, to poor boys; also that Kemp's College for most of the eighteenth and nineteenth centuries housed Charity Schools for the sons and daughters of the poorest families in Wye. An Archbishop of York and of Canterbury, two English monarchs, and a succession of aristocratic and gentry owners of the College all recognised and fulfilled a duty of public service towards the people of Wye by providing and maintaining a school for the good of the whole community. The educational use was sustained by the use of the Latin School as part of SEAC and subsequently the University of London, into the twenty-first century, and is fundamental to the outstanding significance, and to the understanding of that significance, of Kemp's College. This makes it quite improper to propose that the Grade I listed building become merely an accessory to what will be the most expensive of all the private houses in the proposed gated development.
- 2.150 If the application were permitted, Wye College would become an exclusive, gated residential development, whose residents alone could enjoy the kind of year-round access to the Cloister Quad, Latin School and Wheel House that has been the right of Wye villagers since the College was founded.
- 2.151 In the absence of evidence that the dedication of this complex of nationally significant buildings to an exclusively residential use is the only viable option, there can be no clear and

convincing justification for that harm, and no basis to conclude that the public benefit of the conversion would counterbalance the various harms.

- 2.152 Decision makers should give considerable importance and weight to the desirability of preserving the setting of listed buildings and the character or appearance of conservation areas when carrying out the balancing exercise. The proposals for the Workshops and yard, and for the area north of the public footpath, would harm the setting of several heritage assets.
- 2.153 The allocation of the former Workshops yard to private gardens and car parking would change the setting in a way that would continue the existing harm to the significance of the Grade II listed building, and would fail to preserve the character and appearance of the Wye Village Conservation Area. The proposed new houses and car parking north of the public footpath would harm the significance of the parish church and churchyard and the historic campus through changes to their setting, and would fail to preserve the character or appearance of the conservation area.

## Appendices

**Appendix 1.** Supporting evidence

**Appendix 2.** Illustrations

**Appendix 3.** Heritage planning policy context

**Appendix 4.** Statutory designations

**Appendix 5.** Consultation response: Historic England

**Appendix 6.** Extract from Ashford Borough Council - Report of Head of Development Management and Strategic Sites. Planning Committee 20 June 2018. Application Number 17/00568/AS

## Appendix 1. Supporting evidence

### A1.1. Personal statement

- A1.1.1 My name is Kit Wedd. I am the Director of Spurstone Heritage Ltd, a London-based consultancy providing independent advice on conservation and development of historic sites and buildings.
- A1.1.2 I hold a Bachelor of Arts (joint honours) degree in English Literature and Study of Art, and full membership of the Institute of Historic Building Conservation. I have worked for architects and planning consultancies, as a historic buildings and areas inspector for Historic England and in the conservation section of the consulting engineers Alan Baxter Ltd.
- A1.1.3 I have advised on development proposals for many sites containing scheduled monuments and listed buildings. My work on ecclesiastical buildings (or buildings with ecclesiastical origins) includes writing conservation plans and advising on development at Canterbury Cathedral, its Christ Church Gate, and medieval houses within its precincts. In 2019 I gave expert evidence on behalf of West Malling Parish Council at a Public Inquiry into proposed development within the setting of Malling Abbey, Kent. I am currently advising on development at the medieval parish church in Teddington, London.
- A1.1.4 I have written and edited several books about historic buildings, and taught on postgraduate conservation courses. I was deputy director of the Victorian Society and director of the Society's postgraduate Summer School. I now serve the Society as a trustee.
- A1.1.5 On 28 August 2020 I was approached by Richard Buxton Solicitors on behalf of WHPC and asked to act as an expert witness in this case. Before accepting the instruction, I researched the Site and the heritage assets that would be affected by the proposed development, reviewed the planning and listed building consent applications, supporting information and consultation responses, and was satisfied that I would be able to act in this case.
- A1.1.6 I declare that the evidence set out in this proof is true to the best of my knowledge. The opinions expressed are my own and have been formed using my professional judgement, based on my knowledge and experience, and following accepted good practice.

## A1.2. Methodology

- A1.2.1 Information for this Proof of Evidence was acquired on site visits on 3 September and 12 October 2020, and desk-based research. Libraries and archives have been closed due to Covid-19 so I have relied upon secondary sources and online resources. I should like to record my gratitude to Cllr Richard Bartley for the loan of items from his personal library.
- A1.2.2 The Historic Environment Record (HER) has not been consulted, as this is included in the Appellant's Historic Buildings Assessment (CAT March 2017), and all relevant designations have been obtained from other sources.
- A1.2.3 In assessing the significance of the heritage assets I have used the definitions of significance contained in the National Planning Policy Framework 2019 (the NPPF), online Planning Practice Guidance (NPPG) and HE's *Conservation Principles, Policies and Practice* (HE 2008).
- A1.2.4 My assessment of the impact of the proposed development on the significance of the heritage assets follows the methodologies in the HE guidance on *Managing Significance in Decision-Taking in the Historic Environment* (GPA2; HE 2015) and *The Setting of Heritage Assets* (GPA3; HE 2017).

## A1.3. History

### The village of Wye

- A1.3.1 After the Conquest, William I gave the manor of Wye to Battle Abbey. By 1086 Wye had a church, four mills and 143 households, and was among the largest 20% of settlements recorded in Domesday.
- A1.3.2 Wye grew into a religious and administrative centre with jurisdiction over a large part of Kent, and a market centre for the surrounding agricultural area. Its importance was reinforced by the founding of Wye College with an endowment that eventually included the lands and benefices reclaimed from Battle Abbey.
- A1.3.3 By the fifteenth century there was a regular Thursday market in front of the parish church. This ceased to operate by the end of the eighteenth century, and part of the market place — the grandly named Forum — was subsequently built over but the medieval road layout centred on the crossroads of Bridge Street and Church Street still defines the street pattern at the heart of the village and individual medieval building plots are easy to discern in the houses fronting these streets.
- A1.3.4 In 1798 Hasted described Wye as *“a neat well-built town, consisting of two parallel and two cross streets, the whole unpaved. There is a large green in it, built round, on one side of which is the church and college close to it.”* (Fig 7).
- A1.3.5 The railway station opened in 1846, connecting Wye to Canterbury and Ashford. The line evidently carried more agricultural produce than passengers, as there was very little development in Wye throughout the nineteenth century, although some houses were refronted. Historic OS maps show that the expansion of the college campus was the largest development in the village before the First World War (Figs 8–10).
- A1.3.6 There was some growth between the wars: the OS map of 1934 (Fig 11) shows new housing spreading southward along Oxenturn Road and eastward along Coldharbour Lane. Some council housing was built on Bramble Lane, west of the railway, in the post-war period. Houses and bungalows were built on Chequers, Little Chequers and Orchard Drive in the late twentieth century, when fast trains brought Wye within commuting distance of London. Widely-spaced within generous gardens, these introduced a looser suburban grain to the outskirts of the village. Recent housing includes Havilland Close off Bramble Lane.

### Kemp's College

- A1.3.7 The pre-1447 history of the Site is described in the Appellant's *Historic Buildings Assessment*, which appends the Historic Environment Record. (CAT March 2017) This also identifies each building and its place in the phased development of the Site. This section of my evidence, therefore, focuses on aspects of the Site's history overlooked or underplayed in the Appellant's heritage information.
- A1.3.8 In 1432 Henry VI granted Cardinal Archbishop John Kemp (or Kempe; 1380–1453) a licence to found a chantry college in the parish of Wye. It took time to assemble the funding, so it was not until 1447 that the College of St Gregory and St Martin was built, with an endowment of nearly 1,000 acres, including lands reclaimed from Battle Abbey. (Page 1926; Burnham 2007)
- A1.3.9 Kemp was born in Olantigh, and remained loyally attached to Wye parish throughout his long life. He was an extraordinarily able man: Archbishop of York (and later of Canterbury), a trusted adviser to both Henry V and Henry VI, Lord Chancellor, and a skilled negotiator at

home and abroad. Henry V conquered French territory but it was Kemp, following up his monarch's military victories with diplomacy and administrative ability, who secured the subsequent settlements. Kemp may have particularly welcomed the archbishopric of Canterbury and repeated diplomatic missions to France, as they gave him reason frequently to visit Wye. (Davies 2011)

- A1.3.10 The form and layout of Kemp's College followed monastic and university convention. A Hall with a Parlour wing to the north and a service wing to the south made a quadrangle with the churchyard wall to the west. South of this were a separate service building (the Wheel House) and the Latin School, in a looser quad layout open to the south (Fig 12).
- A1.3.11 Kemp's College was one of many scholarly foundations of the period. The scheduled monument description refers to approximately 167 separate colleges that were in existence in 1509. Notably, in 1440 Henry VI founded Eton College for "twenty-five poor and indigent scholars" (Page 1925); the "King's Scholars" were expected to progress to King's College Cambridge, which the king founded the following year.
- A1.3.12 Kemp's College at Wye was a small community of secular (i.e. property-owning) priests who lived, ate and worshipped together. The community consisted of a Provost, six Fellows in holy orders, two clerks and two choristers. The founding statutes required one member of the college to serve as the parish priest. A second was to be Master of a grammar school providing free education to the poor boys of Wye. The others devoted themselves to religious duties, principally singing masses for the repose of the souls of the Founder and his family.

### The Latin School

- A1.3.13 Standing at the south-west corner of the Site, the Latin School (Fig 13) was originally a plain rectangular building of flint with stone dressings containing a single, unheated room with a door at each end. The west door opened onto the churchyard and was connected to the Cloister Quad door by a path belonging to the college along the eastern edge of the churchyard. (Payne 2017) The east door opened into the garden, open to the High Street.

### Post-Dissolution

- A1.3.14 In 1545 the College and its property were expropriated by the Crown. Two years later, Henry VIII granted them to Sir Walter Bucler, private secretary to Queen Catherine Parr, with the proviso that "[Bucler] and his heirs should at all times provide and maintain a sufficient Schoolmaster capable of teaching boys and young lads in the art of Grammar, without fee or reward, in this parish." (quoted in Payne 2017)
- A1.3.15 The College became a dwelling-house held by a succession of private owners who remained responsible for hiring the schoolmaster and ensuring the continuation of the grammar school. Major refurbishments carried out by Thomas Twysden in 1610 included the introduction of a stone fireplace and brick chimney on the west wall of the Hall (Figs 14 and 15), and wainscot panelling and a fireplace in the Parlour (Fig 16). The timber stair in the north wing dates from the same period, and was originally embellished with half-life-size mythological figures —the "Ancient Britons" — on the newels (Figs 17 and 18). (Oram 2013–14) Rooms in the attic of the north wing are probably part of these refurbishments. A fireplace in the Latin School has a chimneypiece with an ovolo moulding and strapwork frieze similar to those of the Parlour chimneypiece (Fig 19), so is presumably also one of Twysden's improvements — although moved to its present location in 1903, when the Latin School was extended.

- A1.3.16 Among the private owners of Wye College were the poet Anne, countess of Winchilsea (1661–1720) and her husband Heneage Finch (1657–1726), who rusticated there from 1690 to 1708 to escape anti-Jacobite persecution at the court of William and Mary. A chimney fire inspired Winchilsea to write the mock-heroic *Apology for my fearfull temper ... upon the firing of my chimney At Wye College March 25th 1702*, in which she describes rousing her household from sleep to deal with the conflagration.

### The Charity Schools

- A1.3.17 The grammar school appears to have been suspended for a short time at the very end of the sixteenth century but was back in operation by 1623 and continued throughout the period of private ownership. In 1713 the College was acquired by Sir George Wheeler, who gave it to the Boys' and Girl' Charity Schools endowed by his aunt, Lady Joanna Thornhill. The schools had in fact been occupying part of the College since 1708, and apparently superseded the grammar school.
- A1.3.18 From 1726 the trustees of the Lady Joanna Thornhill Charity carried out a major campaign of alterations to accommodate growing numbers of pupils. Changes introduced in the 1730s included the rebuilding of the Cloister in brick, with upper rooms lit by timber sash windows (Fig 20). The south range became the Schoolmaster's house, while the Schoolmistress occupied the Parlour wing. The stone wall enclosing the south garden was built in 1735.
- A1.3.19 The schools went through cycles of greater and lesser prosperity according to the energy and acumen of successive masters. Periods of success led to further building work: in 1849 the Wheel Room was reconstructed to accommodate the girls' school, enabling the boys' school to take over the Parlour as an extra classroom.

### The Agricultural College

- A1.3.20 In 1892 the schools moved out to new premises in Bridge Street and Church Street, and the newly established Kent and Surrey County Councils together bought the College buildings with the intention of establishing a new agricultural college. Having purchased the property for £1,000, the Councils spent a further £18,000 on refurbishments and extensions over the next two years:
- "The south wing which had been the Grammar School Master's house was retained as the Principal's residence. The Hall became the refectory, and the adjacent service wing was reconstructed to provide kitchens and ancillary rooms. The Parlour became the Library, and the first-floor rooms around the cloisters accommodation for students."* (Burnham 2007, p. 18)
- A1.3.21 A Brighton-based architect, Paul Ball Chambers, designed the L-shaped extension around the Wheel House, and two wings north of Cloister Quad, the north-east one containing the Lecture Theatre (Figs 21 and 22). Chambers also added bay windows to the Hall and Parlour. He used materials and details that reflected the seventeenth- and eighteenth-century phases of Kemp's College, with stone mullion-and-transom casement windows on the ground floor and timber sashes above.
- A1.3.22 The South Eastern Agricultural College (SEAC) received its first intake of 14 students in November 1894. It grew rapidly: the campus quadrupled in size between 1901 and 1914, with buildings designed by the eminent architect Thomas Edward Collcutt (1840–1924), at first working alone and from 1906 in partnership with Stanley Hinge Hamp (1877–1968).



- A1.3.23 The completion of the SEAC campus was Collcutt's last major commission. Best known for dramatic architectural statements he created for commercial and institutional clients in London — the Savoy Hotel, Palace Theatre and Wigmore Hall in Westminster, and the Imperial Institute in South Kensington — Collcutt was perhaps an unlikely choice to extend a medieval college in a rural village. In his domestic work after 1900, however, he followed Arts and Crafts principles, using traditional materials to reinterpret vernacular buildings. His work at Wye expresses this gentler side of his architectural personality and his deep understanding of local materials and building techniques.
- A1.3.24 The extensions to the north of Kemp's College (West Quad and North Quad) echo the proportions, materials and detail of the earlier buildings, and continue the inherited fenestration of stone casements on the ground floor with timber sashes above. Collcutt's extension is the last of three building phases that are clearly legible in the long wall enclosing the east side of the churchyard, in a comfortably evolving pattern of brick, stone and render (Figs 23–25).
- A1.3.25 A new range containing a museum and classrooms separated West and North Quads. This was followed c. 1903 by the Wood and Iron Workshops in a long range to the north-east (Fig 26). The Workshops range pre-dated the construction of Agricola Quad, so for the first decade of their existence overlooked lawns and tennis courts along Olantigh Road (Fig 27). This prominence surely influenced the high quality of their design, in vernacular revival style incorporating historic Kentish building motifs and materials. The careful details include a jettied and tile-hung first floor, Tudor arch to the central front door, and horizontally-sliding timber sash windows in the wings.
- A1.3.26 In 1903, a brick extension was added to the north side of the Latin School. The chimneypiece of c. 1610 was reinstalled against the new wall. These alterations were made at the behest of Malcolm Dunstan (Principal of SEAC, 1902–22) so that the little fifteenth-century schoolhouse could accommodate a full-size billiard table. (The list description offers an alternative suggestion, that the alteration in fact reduced the footprint of the Latin School; Appendix 4).
- A1.3.27 Squires was completed in 1904 (Fig 28).
- A1.3.28 A gymnasium of 1906 (later demolished and replaced by the Dining Hall) completed the range between Middle and Agricola Quads. Another burst of activity before the First World War saw the completion of the historic campus. The north range of Agricola Quad was built in 1912, enclosing the Workshops yard; the layout of this is now obscured by extensions (Fig 29). Collcutt and Hamp completed the quad in 1914 with the south (entrance) range on the High Street, which wrapped round to join the east wing on Olantigh Road (Figs 30 and 31). The interior elevations of the quad suggest an architectural progression over time, with a masterful reimagining of Kemp's timber cloister on the south and west sides and a Tudor palace to the north and east, with materials and detailing of particularly high quality (Figs 32 and 33).

### Twentieth-century alterations and additions

- A1.3.29 The gym was demolished and replaced by the Dining Hall in 1953. The architect was Thomas Winder Harrison (1904–80), and Lord Northbourne, chairman of the College governing body, designed the interior panelling. This large open space with its exposed hammerbeam roof is an impressive *“modern interpretation of the Great Hall, both in the grandeur of its architecture and its function as a refectory”*. (Figs 34 and 35).
- A1.3.30 The first building to extend the college north of the footpath was the Guinness Laboratory, funded by the brewing company for hop research and opened by the Earl of Iveagh in 1936

(Fig 36). Its steeply-sloped tiled roof and gabled bay give it a faintly Arts-and-Crafts flavour. Its conventional design and traditional materials are old-fashioned for its date — especially considering that it was designed for scientific research — but do connect it visually to the historic campus.

- A1.3.31 The Jubilee Building, a two-storey flat-roofed block, was added in 1977. Its architect has not been identified. The other Science Buildings also date from the post-war period.

#### The Site today

- A1.3.32 Wye Agricultural College became part of Imperial College, University of London, in 2000 — which permitted London briefly to claim to be the third-oldest university in England, after Oxford and Cambridge. The Wye campus was closed in 2008, and sold (excluding Withersdane Hall) to TT in 2015.
- A1.3.33 After the College closed the Latin School was leased to Wye Heritage by Imperial College and this use is currently permitted to continue by TT.
- A1.3.34 Apart from this, the site has been unoccupied since the Agricultural College moved out. It is now enclosed by perimeter fences and hoardings, and there is on-site security. This has not prevented occasional vandalism and theft. In September 2020 lack of maintenance was evident, in peeling paintwork and signs of water damage (Figs 37 and 38).
- A1.3.35 An application for planning permission and change of use of Squires from student accommodation back to four individual dwellings was approved on 22 August 2016 (16/00839/AS). This permission has lapsed unimplemented and this building too is deteriorating.

## A1.4. Assessment of significance

- A1.4.1 This section describes the heritage significance of the Site, including the contribution to significance made by the setting. It follows the advice on assessing significance contained in the NPPF and HE guidance.

### Assessing significance

- A1.4.2 Significance underpins the definition of a “heritage asset” in Annex 2 of the NPPF:

*“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).”*

- A1.4.3 The NPPF defines significance as:

*“Significance (for heritage policy): 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.”*

### Communal value

- A1.4.4 Historic England’s *Conservation Principles* also identifies the cultural values that contribute to significance. These are broadly aligned with the types of interest identified in the NPPF, but include an additional type of interest: communal value. This:

*“derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.”* (HE 2008; para. 54)

Specific aspects may be the commemorative, symbolic, social or spiritual values of a place.

- A1.4.5 The NPPG also allies historic interest with communal value:

*“Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.”* (Para. 006 Reference ID: 18a-006-20190723)

- A1.4.6 Communal value is fundamental to the significance of Wye College because of the profound and ancient social, educational and spiritual connections between the college and the village community.

- A1.4.7 It should be noted that “communal”, as used by HE in *Conservation Principles* to define value that contributes to significance, refers to “*the people who relate to [a place], or for whom it figures in their collective experience or memory*”. (HE 2008, p. 7). This is different from its use in the Appellant’s application documents, where “communal” refers to the interests and activities of the owners and occupants of the proposed private housing.

- A1.4.8 Significance is usually derived from a mix of the types of interest mentioned in the NPPF and *Conservation Principles*, and it is a relative value that depends upon the type of Site being assessed and its context — so (for example) a range of agricultural workshops that constituted the working hub of a Victorian model farm might have high significance in that

context, whereas the Wye Agricultural College Workshops have no more than moderate significance in the context of the historic campus as a whole.

- A1.4.9 Understanding significance helps owners and others responsible for managing heritage assets to repair, maintain and develop them in ways that preserve, enhance or better reveal their special interest, character or cultural value. Analysis of the relative significance of different parts of a site can help designers arrive at the most appropriate proposals by identifying parts that can sustain a greater or lesser degree of intervention—those that can be changed without harm to significance, and those that are more sensitive and should not be changed.

#### Levels of significance

- A1.4.10 Different levels of significance for individual parts of a site may generally be defined as follows:

**High significance:** makes an important specific contribution to the special interest of the site

**Moderate significance:** makes a specific contribution to the special interest of the site

**Low significance:** makes a general contribution to the interest of the site

**Neutral:** makes no contribution to special interest, but does not detract

**Detracts:** obscures or harms significance.

Some sites have significance that exceeds the general definitions given above. Kemp's College, where several highly-graded assets combine and overlap to amplify each other's significance, attains **outstanding significance**.

#### How setting contributes to significance

- A1.4.11 In addition to its intrinsic interest, a heritage asset may derive significance from its setting. The NPPF defines setting 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."*

- A1.4.12 GPA3 (HE 2107) contains detailed guidance on defining setting and how it contributes to significance, and this guidance has been used to inform the assessment in 2.47–2.57.

#### Significance of the Appeal A Site

##### Designations

- A1.4.13 The Medieval College of St Gregory and St Martin at Wye is a scheduled monument. This confirms that it is a nationally important archaeological site. The Appellant's *Historic Buildings Assessment* covers this aspect of the Site in detail. (CAT March 2017)
- A1.4.14 The significance of Wye College Cloister Quadrangle and the Latin School is officially recognised by their inclusion in the statutory list of buildings of special architectural or historic interest, both at Grade I (Appendix 4). This confirms that they are of exceptional interest; only 2.5% of listed buildings are Grade I.
- A1.4.15 The Wheel House (Junior Common Room) and attached Wall and Gates are listed at Grade II\*. This grade is applied to particularly important buildings of more than special interest; 5.8% of listed buildings are Grade II\*.

- A1.4.16 Wye College, Entrance and Hall Quadrangles are listed at Grade II. Buildings in this category are of special interest warranting every effort to preserve them; 91.7% of all listed buildings are in this grade.
- A1.4.17 The Workshops are within the curtilage of the Grade II listed building.
- A1.4.18 The Wye Village Conservation Area designation confirms that it is an area the character or appearance of which it is desirable to preserve or enhance. The northern boundary of the conservation area is the public footpath that runs across the northern part of the Site.
- A1.4.19 The scheduled monument, listed buildings and conservation area are designated heritage assets as defined in Annex 2 of the NPPF.

#### Archaeological interest

- A1.4.20 The archaeological interest of the Site is dealt with in the CAT report, which also catalogues the buildings. My evidence therefore concentrates on aspects of significance that I consider to have been overlooked or underplayed in the Appellant's heritage information.

#### Historic interest of Kemp's College

- A1.4.21 John Kemp, Cardinal, Archbishop of York (later of Canterbury) and Chancellor, was a senior cleric, an international diplomat and a trusted adviser to two English monarchs, Henry V and his son, Henry VI. In 1432 the latter granted Kemp a licence to found a chantry college at Wye. The connection between these important figures, which led eventually to the founding of Wye College, is of great historic interest.
- A1.4.22 The College was founded in 1447, with an integral grammar school. This was only six years after Henry VI founded Eton, both colleges being part of a flowering of educational foundations in the late fifteenth century. (The Grade I statutory list entry for the "outstanding group of buildings surrounding two courtyards" of Eton College includes School Yard and Green Court of 1441–6 and the Chapel of 1449–59; List entry No. 1290278). The date gives Wye College a specific historical context that contributes to its significance.
- A1.4.23 The Schedule entry emphasises the importance and rarity of the Site as a late-medieval college that survives in its original physical form and —until 2008 — use:  
  
*"The buildings of the original college foundation - the Old Latin School, the cloister quadrangle and the Wheel Room - have remained in use as educational establishments almost continuously since their foundation. The 15th century buildings have been well maintained, and various rebuilding schemes have allowed the buildings to be adapted for modern use, as well as to maintain their structural integrity."* (Appendix 4).
- A1.4.24 In assessing the historic interest of Kemp's College it is vital to think of the Cloister Quad, Latin School and Wheel House as a single entity, conceived of and built as one foundation, indivisible for domestic, social, religious and educational purposes. They have been together, physically and in terms of function and access, ever since. That relationship contributes greatly to their historic interest.
- A1.4.25 Henry VIII specified that the school use should be continued by post-Dissolution owners of Kemp's College. These owners included the poet Anne, Countess of Winchilsea. School education was indeed maintained almost continuously in Kemp's College until 1892, when it was succeeded by the Agricultural College. The educational use of the Site, sustained over more than 570 years, contributes greatly to its historic interest.

## Architectural and artistic interest of Kemp's College

- A1.4.26 The completeness of the medieval college at Wye is remarkable. All the component parts survive: Hall, domestic and service wings, and a separate bakehouse / brewhouse. The historic plan form and circulation are largely preserved, and much fifteenth-century fabric remains, including moulded and traceried stone doors and windows, crown-post roofs and fragmentary stained glass.
- A1.4.27 Early seventeenth-century fabric includes the Hall fireplace and chimney, and high-quality panelling in the Parlour and Solar. Ceilings and partitions were inserted in the upper part of the north range. The Jacobean Stair was also installed at this date. Paint research has identified traces of historic painted decoration including marbling, that put this part of the listed building "on a par with the great staircase at Knole". (Oram 2013–14; 43) The carved wooden statues that were part of the original decoration of the stair remain on site — a rare survival. These changes are clearly legible and aid understanding of the historic development of the college.
- A1.4.28 The replacement in brick of the original timber cloister in the 1730s, is evidence of the changes required to support the school use of Kemp's College.
- A1.4.29 The Latin School was originally smaller: the north bay added in 1903 is easy to discern. Internal features include fixed joinery cupboards with ogee panelled doors and hand-forged iron L-hinges, and a Jacobean chimneypiece similar to that in the Parlour, carefully reinstalled within the 1903 extension.
- A1.4.30 The Wheel House, originally the service block for Kemp's College, was altered in 1749 to accommodate the Girl's School and was subsequently extended by Chambers. Its medieval crown-post roof survives above rebuilt walls.
- A1.4.31 Their high degree of historic, architectural and artistic interest gives the highly-graded listed buildings of Kemp's College **outstanding significance**. HE have advised that "*This group of buildings is of outstanding significance for its architectural interest and for the ways in which its rare and unusually well-preserved fabric illustrates the arrangement and use of a fifteenth-century chantry college.*" (HE 26 May 2017)

## Historic interest of the Agricultural College and Workshops

- A1.4.32 The founding of SEAC in 1892 was one of many educational initiatives undertaken by the newly-formed county councils following the Local Government Act 1890. From modest beginnings as a college of estate management, SEAC (later Wye Agricultural College) grew into an institution of international importance, which had a transformative influence on agricultural research, science and practice. Distinguished Principals and staff led important research and produced standard texts, and their students, particularly from Commonwealth countries, spread knowledge gained at Wye throughout the world. In the mid-twentieth century, for example, it was estimated that one-third of global hop cultivation was from varieties developed at Wye. (Richards, 1994; 203) The Agricola Club of alumni living and working across the world sustains their interest in the college and the important work carried out there.
- A1.4.33 Considered without the Workshops, the Grade II-listed Wye College Entrance and Hall Quadrangles can be understood as a conventional academic environment designed for quiet study and collegiate life. However, students at the Agricultural College pursued their studies in "gowns and gumboots": their scientific and theoretical training was complemented by practical experience on the College's own farm, east and north-east of the village (Figs 39 and 40). In the Workshops they learned how to fix machinery or build



gates and fences. The building illustrates the historic use of the Site and agricultural practices since the Edwardian period, which gives it historic interest.

- A1.4.34 Plaques, memorials, inscriptions and other features throughout the historic campus record the college's history and development. Besides the war memorials in Cloister Quad, there are stained glass portrayals of Henry VI and John Kemp in the Chapel, an inscription recording the First World War hospital depot in Middle Quad, a dedicatory sundial in Agricola Quad, and many others (Figs 41–44). These incidents, occurring throughout the Site, point to its educational and community use, and add to its historic interest.
- A1.4.35 The influence of the Agricultural College on later development of land to the north on Olantigh Road and Occupation Road is clear from the old maps (Figs 8–11): the modern academic buildings are on a larger scale and more loosely arranged, and the old idea of arranging them to form quads has been abandoned. The influence of the College on the wider development of Wye is of local historic interest.

#### Architectural and artistic interest of the Agricultural College and Workshops

- A1.4.36 From 1892 onwards, nearly all the buildings added to the historic campus were of high design quality, in a variety of historical revival styles sympathetic to the medieval college, and built with good materials and exceptional craftsmanship. The exceptions are the twentieth-century extensions added to the Workshops yard.
- A1.4.37 The most notable of the interiors added by Chambers is the Lecture Theatre, with steeply raked seating and robust, “student-proof” joinery, which preserves intact the arrangement of a late-Victorian teaching space.
- A1.4.38 Collcutt & Hamp's work in all four quads in the Grade II-listed building is of uniformly high quality. There is little of note in the design of the interiors, most of which are functional teaching spaces or student accommodation; the principal architectural and artistic interest is in the elevations. The interior elevations of the quads are full of good details — particularly in the joinery of Agricola Quad — while the materials, elaboration and details of the external elevations are carefully graded to reflect their status, according to whether they grandly announce the entrance on the High Street, express the methodical work of the labs looking onto Olantigh Road, or provide an enclosed, defensive edge to the college along the public footpath. The collegiate character and readability of these buildings contributes greatly to their architectural and artistic interest.
- A1.4.39 T. W. Harrison's Dining Hall is of architectural interest as a sensitive and high-quality addition to the historic quads, in matching brick and stone, and subtly different on each side: a projecting east window bay onto Middle Quad answering the bays that Chambers added to the old Hall, and a full-width west bay seamlessly completing Agricola Quad on the west side. As noted above, its interior is impressive in scale and construction, with an exposed hammerbeam roof and a complete scheme of panelling, all in English oak.
- A1.4.40 For all these reasons, the Grade II listed buildings of Wye College have **high significance**.
- A1.4.41 The Workshops have architectural and historic interest as probable designs by Collcutt, and are part of the phased development of the Agricultural College in the Edwardian period. They were carefully planned as a symmetrical composition, in revived Kentish vernacular architecture, using local traditional building materials and incorporate interesting details such as tile-hanging (a local tradition) and horizontally-sliding sashes (a form historically associated with industrial buildings). The contrast between the formal, high-status quads and the functional architecture and informal setting of Workshops is instructive, and contributes to our understanding of the heritage assets.

- A1.4.42 The committee report on the listed building consent application noted that the Workshops are not referred to in the list description. (ABC 20 June 2018; 17/00568/AS, para. 72) Wye College was first listed in 1952 and the description is an “old-style” listing, with minimal detail (Appendix 4) Were a listing inspector to revisit the College today, it is certain that the Workshops would receive more careful consideration and their special architectural and historic interest would be identified.
- A1.4.43 Their historic, architectural and artistic interest gives the Workshops **moderate significance**.
- A1.4.44 The setting of the Workshops is the yard entered off Olantigh Road, a location of less importance than the High Street. It has an informal and open character that contrasts with the enclosed geometry of the formal quads, and this contrast is important to the understanding of the functions and relative status of the different parts of the college. The existing twentieth-century extensions in the yard **detract from its significance**.

### Communal value

- A1.4.45 The spiritual, educational and social activities of the College over more than five centuries have profoundly affected the Wye village community. Published histories repeatedly emphasise how the presence of the College “transformed the social and cultural life of the village” (e.g. Burnham 2007; 22), and made Wye “a miniature university town”.
- A1.4.46 Kemp’s College was never an enclosed monastic order. Its members were permitted to own property (which implies worldly responsibilities outside the confines of the College) and served the community as parish priests and grammar school masters. They would have employed local people as domestic staff, used the trades and services available in Wye, and had tenants in the farms and other properties owned by the College. As a major local landowner the College may have checked the expansion of the town by ensuring that its landholdings were kept in profitable agricultural use.
- A1.4.47 Although for most of its history the school had a good reputation and was led by able Masters, it never attained the success and fame of its contemporary, Eton. The grammar school and the Charity Schools that followed it produced few distinguished alumni — although the prolific journalist Alaric Alexander Watts (1797–1864) spent two happy years as a pupil at Wye. (Hawes 2009) Nonetheless, the schools were a mainstay of village life for generations of Wye families over 445 years, and their successor schools still thrive.
- A1.4.48 The subsequent educational use of the College by SEAC and Imperial College was a further source of community engagement and local pride. The agricultural college owned and cultivated a large area of farmland north and east of the village, and it was SEAC students who created a local landmark when they cut the Wye Crown into the chalk of Wye Down to commemorate the coronation of Edward VII in 1902.
- A1.4.49 The College was also integrated into the social and cultural life of the local community. By custom and tradition it provided venues for meetings and events that were central to the lives of Wye residents. The Latin School particularly was used for public lectures and township meetings. During the 1860s it was used as a practice room by the boys of the village drum and fife band.
- A1.4.50 The presence of large numbers of students supported the local economy and the resident staff and students of SEAC inevitably became involved in village activities. Principal Dunstan was a churchwarden and President of the Town Band, his wife was a founder member of Wye Women’s Institute and during the First World War their daughter Hester organised local women volunteers to run a supply depot for Wye Hospital in Middle Quad.



- A1.4.51 In 1939 SEAC students were transferred to Reading, to make room for 180 “Land Girls”, who were to be trained at Wye. Soon after this the College buildings were requisitioned for use as Divisional Headquarters of Southern Command. Lt.-General Bernard Montgomery (“Monty”), then Corps Commander for south-east England, visited Wye frequently and briefed his officers in the Latin School and Lecture Theatre. Cloister Quad has Memorials to Wye staff and students who died in both World Wars.
- A1.4.52 The Chapel was (re)consecrated in 1997, shortly after the quincentenary of the founding of Kemp’s College. It is registered as an approved venue for marriages, and while the College remained open it was busy with regular wedding receptions. At other times it was available for services or quiet contemplation, and has been described as *“a place of rare stillness and calm”* (local resident’s representation to Planning Committee 20 June 2018). Until the Agricultural College closed, it shared its facilities generously with local residents, and allowed them informal use of its gardens and green spaces, which fostered a sense of proprietorial pride in local people.
- A1.4.53 Wye Agricultural College held residential summer school programmes for many years, and the U3A and WEA offered day courses in the Latin School. The Wye Heritage Centre opens the Latin School to the public on two Saturday mornings per month.
- A1.4.54 This rare and special combination of exceptionally high levels of historic, architectural and artistic interest, and communal value, give the Grade I and II\*-listed buildings of Kemp’s College **outstanding significance**.

## A1.5. The Appellant's heritage information

### CAT Heritage Statement

- A1.5.1 The NPPG explains why it is important for decision-makers to be fully informed about the heritage significance of a Site when considering development proposals. In answer to the question, "*Why is 'significance' important in decision-making?*", the NPPG states:
- "Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals [...]"* (Paragraph: 007 Reference ID: 18a-007-20190723)
- A1.5.2 The NPPG also explains what assessment of the impact of proposals on the significance of affected heritage assets should be included in an application:
- "Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework paragraph 189). In doing so, 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)
- A1.5.1 The Appellant's heritage adviser is the Canterbury Archaeological Trust (CAT). The Appellant submitted a report entitled *Wye College, Wye, Kent* (CAT, March 2017) as the Heritage Statement in support of the planning and listed building consent applications for the Appeal A Site.
- A1.5.2 The Introduction says that this report "*is intended to combine the functions of a general archaeological desk-based assessment of heritage assets and archaeological potential within the [Proposed Development Area], and a more detailed historic buildings assessment of its Listed Buildings and structures*". (CAT 2017; page 1). It is a thorough, detailed, richly illustrated and fully footnoted document. In more than 100 pages it describes the history of the Site from the Stone Age to the present day. It includes the Historic Environment Record. I do not disagree with any of the statements in this historical narrative and description of the Site.
- A1.5.3 However, as far as assessing significance is concerned CAT 2017 is descriptive rather than analytical — essentially a gazetteer of the component parts of the Site. It contains no assessment of significance based on the types of interest identified in the NPPF, the values identified in *Conservation Principles*, or any other methodology. There is no attempt to define the relative significance of different parts of the Site beyond noting the listing Grade (I, II\* or II).
- A1.5.4 There is no consideration of how the place compares with others sharing similar values, as recommended in *Conservation Principles*. (HE 2008, p. 21) The contemporary context and connection between Henry VI and Kemp — illustrated by, for example, the founding of Eton College in the same period — are overlooked. There is no discussion of contemporary comparable colleges or chantries, although the Schedule description refers to "approximately 300 separate colleges [that] existed during the early medieval and medieval period" and states that "*In view of the importance of colleges in contributing to our understanding of ecclesiastical history, and given the rarity of known surviving*

*examples, all identified colleges which retain surviving archaeological remains are considered to be nationally important.”*

- A1.5.5 There is no consideration of how the completeness and integration of Kemp’s College contributes to significance by illustrating the arrangement and use of a fifteenth-century chantry college.
- A1.5.6 The intrinsic significance of the Workshops, and the contribution they make to the significance of the Grade II listed building, are not identified.
- A1.5.7 The word “significance” appears twice in the CAT report, in both instances in connection with archaeological potential of the Site (para.s 3.1.1 and 3.1.2.1). Readers are left to infer the significance of the above-ground heritage assets from their statutory designations.
- A1.5.8 The CAT report ignores communal value: there is no discussion of the social dimension to the relationship between Wye College and the village of Wye.
- A1.5.9 It does not describe the contribution to significance made by the setting(s) of the heritage assets
- A1.5.10 It includes general statements about how development should be undertaken: “It is desirable that pretty much any alterations should be designed and approved very carefully, and subject to close archaeological supervision.” (CAT 2017; page 22) and: “We understand that the developers intend to retain this superb lecture theatre and put it to community purposes, which is very much to be welcomed.” (CAT 2017; page 22) However, there is no discussion of the specific proposals in the Appeal A scheme, or their impact on the significance of the heritage assets.

#### **Other heritage information submitted by the Appellant**

- A1.5.11 The application also includes a *Draft Schedule of Works. Heritage Impact Assessment for Proposed conversion of existing building at Former Wye College, High Street, Wye* by BDB Design (April 2017; 17-00568-AS\_HIA\_BDB). The subtitle is inaccurate: this is a schedule of works, with no assessment of the impact of the proposals on the significance of the heritage assets.
- A1.5.12 The document entitled *Heritage Commentary* is an undated, one-page document setting out a general approach to implementing the works, in the broadest terms.
- A1.5.13 A *Minstrels’ Gallery Appraisal Report* (B J Stocker Structural Engineer, n.d.) concludes that the structure of the gallery floor is inadequate for its proposed use, and recommends restriction of access during further consideration of the possible use of the Hall and Gallery.
- A1.5.14 In my view, therefore, contrary to NPPF para. 189, the application does not provide the local planning authority with the information they needed to come to a properly informed view of the impact on significance of the proposed development.

## A1.6. Historic England's advice

### A1.6.1 HE advised:

*"We think that the balance of impacts in this case could result in a net positive effect on the significance of the listed building, meaning that paragraph 134 of the NPPF would not need to be applied"* (HE 26 May 2017, p. 6 full para. 1; Appendix 5. Note: para. 134 of NPPF 2012 became para. 196 of NPPF 2019, retaining the same wording.)

### A1.6.2 I argue that the net effect would be negative. My view may differ from that of HE on the application of conservation philosophy. However, to focus solely on the physical interventions, and the impacts (positive and negative) that these would have on the architectural and artistic interest of the College, is to ignore the harm caused by the dis-integration of Kemp's College and the loss of public access to and use of the College.

### A1.6.3 This points to an internal contradiction in HE's advice, which first acknowledges that:

*"This group of buildings is of outstanding significance for its architectural interest and for the ways in which its rare and unusually well-preserved fabric illustrates the arrangement and use of a fifteenth-century chantry college."* (p. 2, para 2; my emphasis)

but then accepts proposals that would fatally undermine that illustrative value by separating Kemp's College into three private dwellings and "communal" spaces, rendering the historic "arrangement and use" illegible. By considering each proposal in turn as a discrete physical alteration to historic fabric, EH sidestep consideration of the dis-integration of the college.

### A1.6.4 HE appear to accept that the residential use of Kemp's College is acceptable in principle because *"The south and west ranges of the Cloister Quad were for a very long period in residential use before the site became an agricultural college"* (p. 4, full para 2) If this refers to the period 1547–1713, when the College was in the hands of private owners, it should be noted that during this period the College was not subdivided but remained an integrated and interconnected whole.

### A1.6.5 Furthermore, the educational use of the College by and for the people of Wye did not cease during the period of non-institutional ownership: the private owners maintained the grammar school and hired the Schoolmaster, as decreed by Henry VIII. This period of non-institutional ownership does not provide justification for the current proposal to dis-integrate the College by physical separation into three private dwellings, and deny the local community access to the College.

### A1.6.6 It should also be remembered that Kemp's College was always partly residential, mostly in connection with the educational uses and community activities on the Site. It was a private dwelling for 166 years; for the other 395 years between its founding and closure it was home to priests, scholars, schoolmasters and schoolmistresses, and the staff and students of the Agricultural College — but always ancillary to its primary use as a religious community, school and latterly an agricultural college. The proposals would sever this connection, permanently and irreversibly.

### A1.6.7 HE did not consider communal value, which may account for their willingness to accept severely restricted public access to a limited part of the Site.

### A1.6.8 The deficiencies in the heritage information submitted with the applications meant that when HE was undertaking its assessment it was not informed — or at least not fully informed — of the elements which contributed to the College's significance. It is

presumably for this reason that HE did not fully appreciate the harm caused by the disintegration of the Kemp's College, and overlooked the communal value.

- A1.6.9 A recent decision on proposed development of land east of Lavenders Road, West Malling, Kent (Appeal Ref: APP/H2265/W/19/3227034) provides an example of where: (a) an inspector departed from the judgment of HE as to the level of harm caused; (b) in doing so she agreed with my judgement as to the level of harm (following testing of evidence at an inquiry); and (c) importantly, as here, HE's judgement was based on a heritage impact assessment which was deficient, such that HE's judgement was not fully informed.

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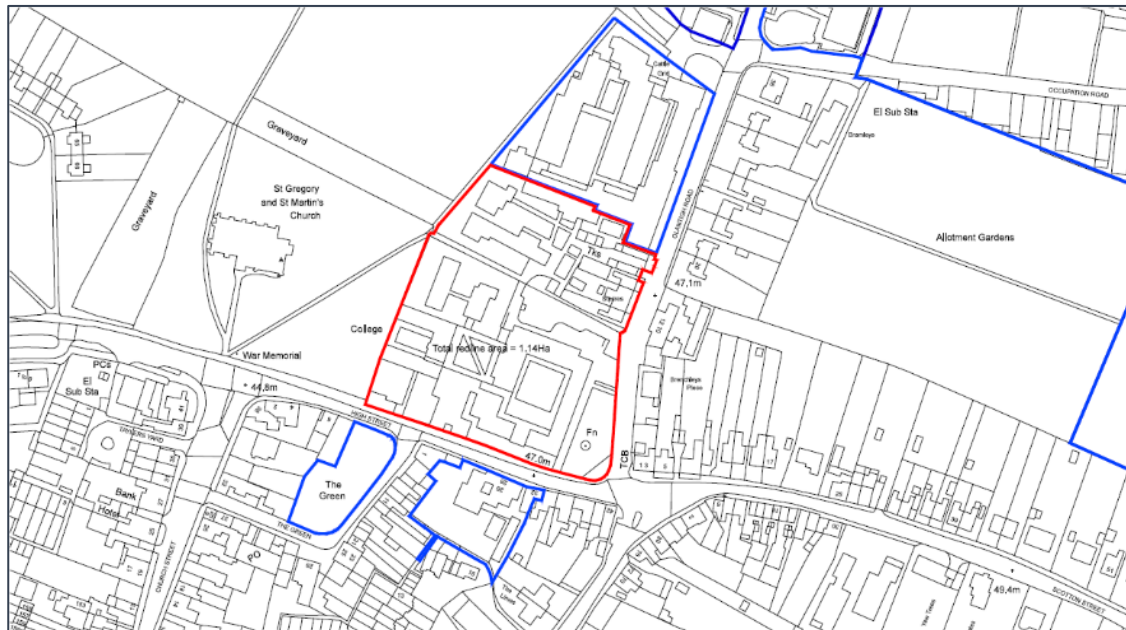
Wye with Hinxhill Parish Council (December 2020). *Uses of the Latin School in Parish Council Stewardship*

## Historic England advice

Historic England (26 May 2017). Letter Tom Foxall [HE] to Mark Chaplin [ABC], (Appendix 5)



## Appendix 2. Illustrations



*Fig 1. Site location plan: the Appeal A Site outlined in red*



*Fig 2. The site in context: the Appeal A Site outlined in red (Google Earth, annotated)*

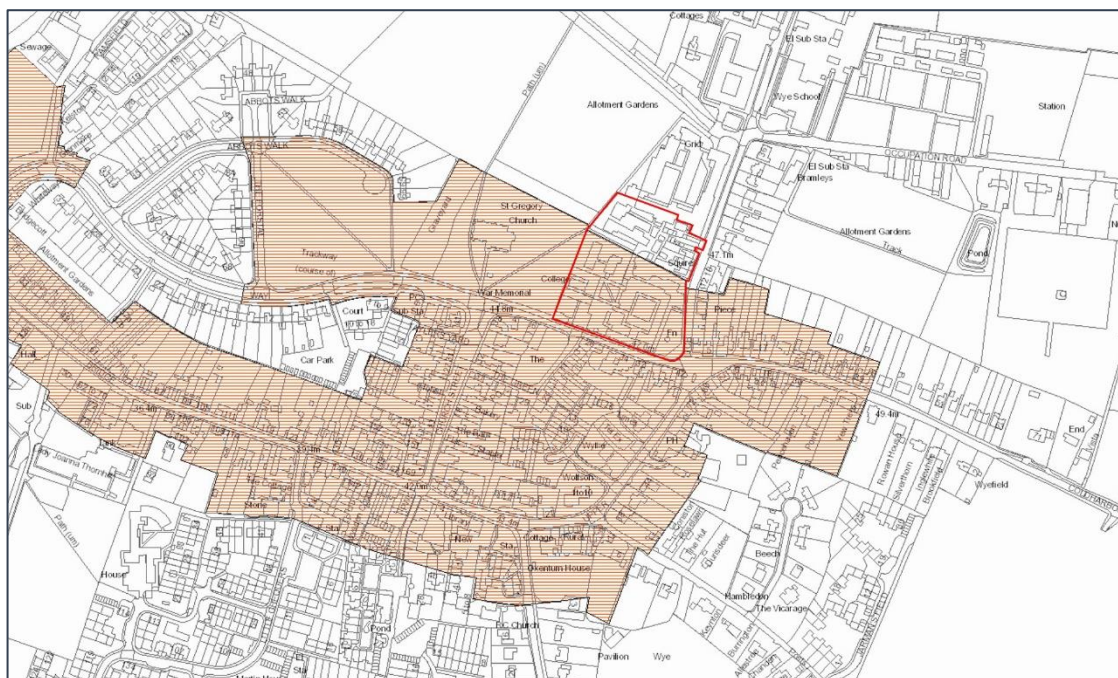


*Fig 3. The scheduled monument (HE)*



*Fig 4. Listed buildings. Red = Grade I; green = Grade II\*; Blue = Grade II (HE, annotated)*





*Fig 5. Wye Village Conservation Area (ABC, annotated)*



*Fig 6. The entrance to the screens passage of the Hall gives a glimpse of Cloister Quad beyond*



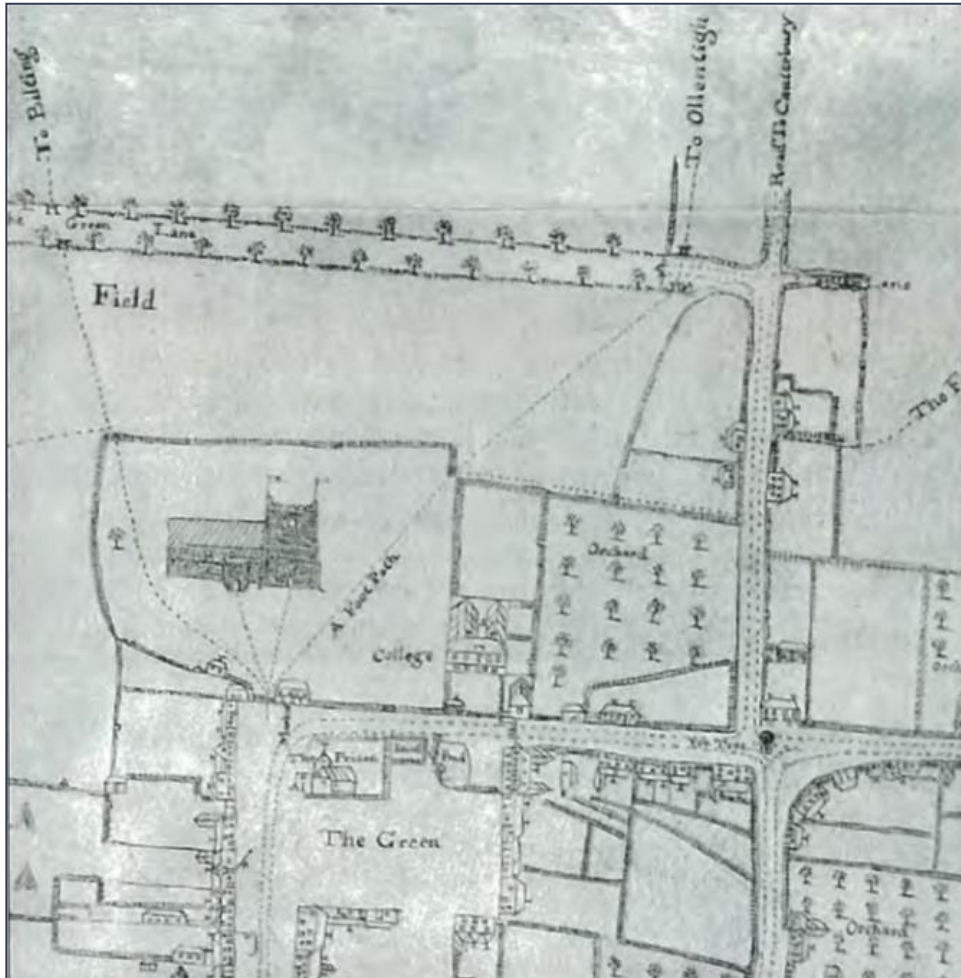


Fig 7. Michael Moon, Map of Wye, 1746, detail



Fig 8. OS map; 1876, detail (NLS)



Fig 9. OS map, 1898, detail (NLS)

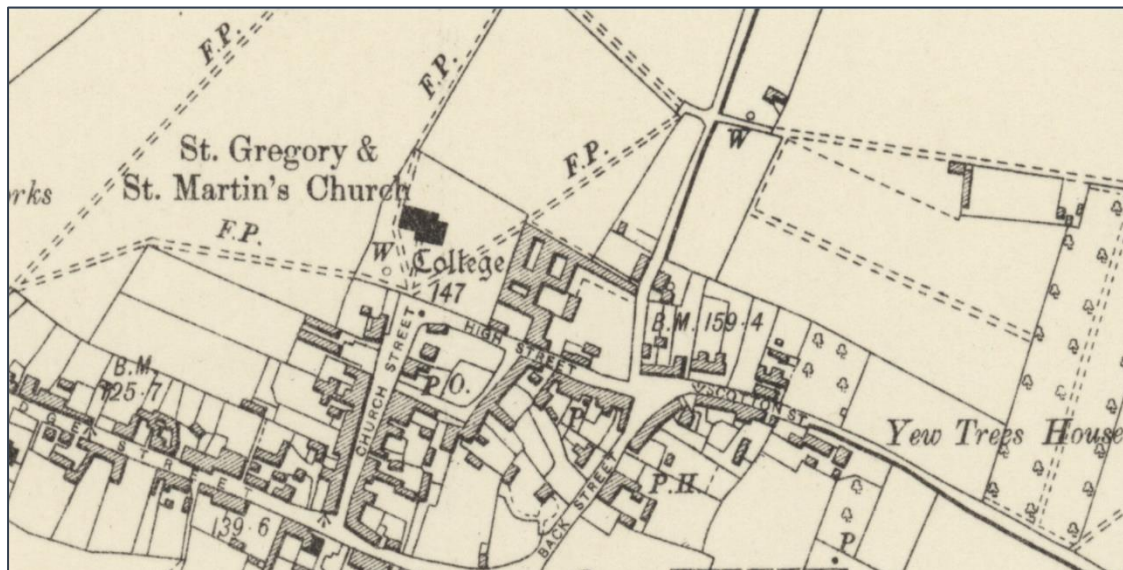


Fig 10. OS map, 1908, detail (NLS)



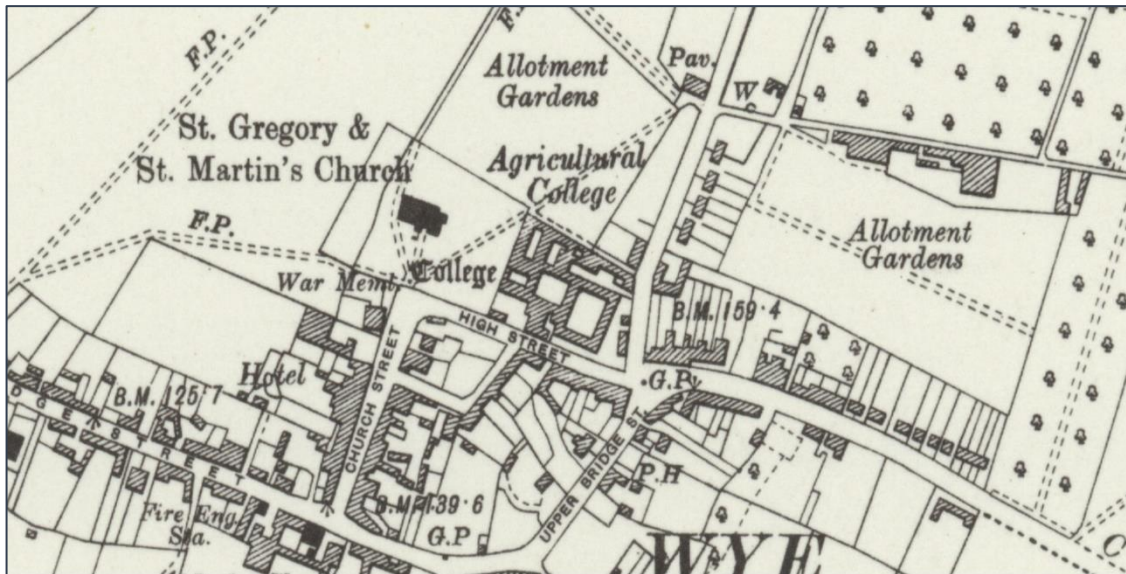


Fig 11. OS map, 1934, detail (NLS)

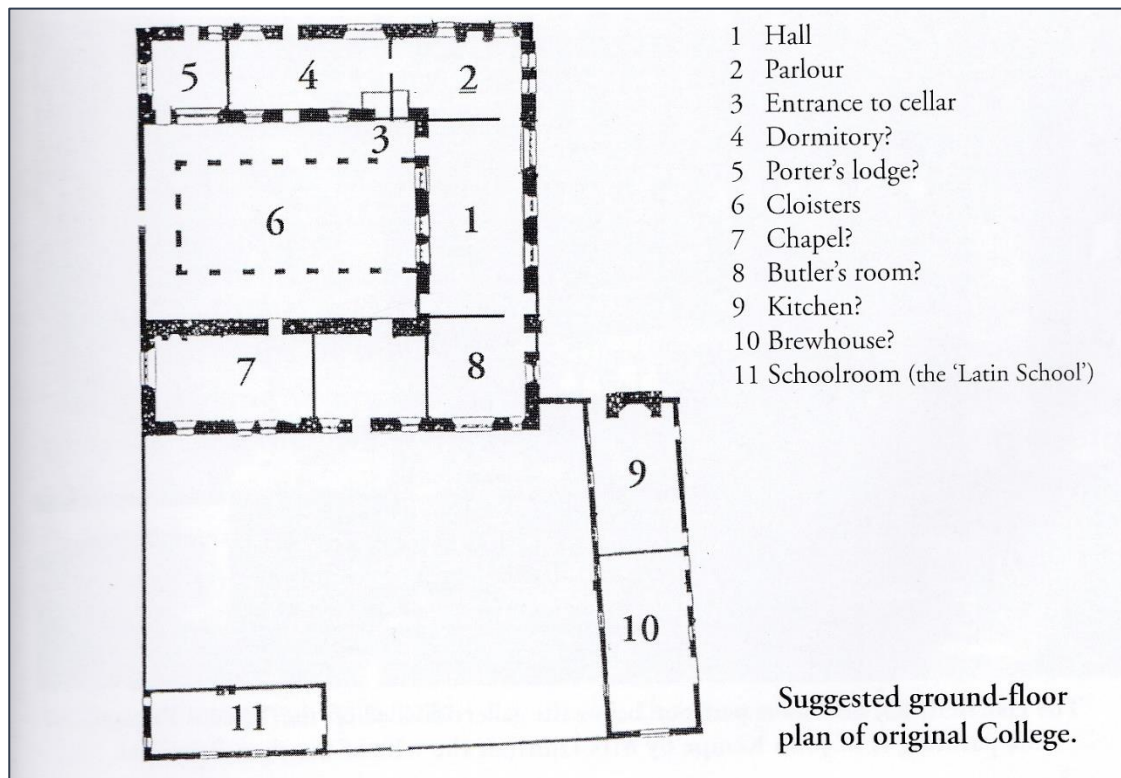


Fig 12. The layout of the medieval college (from Burnham 2007, p. 5)



*Fig 13. The Latin School, from the south-west, with the south range of Kemp's College behind*



*Fig 14. The Hall fireplace*





*Fig 15. Cloister Quad: east interior elevation with Hall chimney*



*Fig 16. The Parlour*





*Fig 17 (left). The Jacobean Stair. Fig 18 (right). Two of the “Ancient Britons” (Imperial College)*

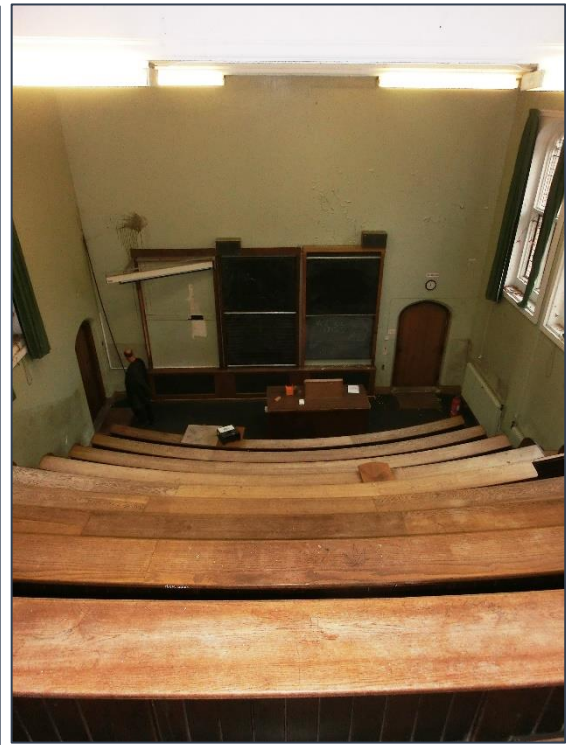


*Fig 19. The Latin School fireplace*





*Fig 20. Cloister Quad: west interior elevation with door to churchyard*



*Figs 21 and 22. Lecture Theatre interior*





*Figs 23 and 24. Wye College west wall viewed from the tower of the parish church*



*Fig 25. The College viewed from the churchyard*





*Fig 26. The Workshops, c. 1903: centre block and east range viewed from the yard*



*Fig 27. Wye College viewed from the south-east, c. 1905, before the construction of Agricola Quad. The west range of the Workshops is visible at the right-hand side of the image*



*Fig 28. Squires, Olantigh Road, viewed from the south*



*Fig 29. Workshop yard: extensions in the yard, looking eastward from first-floor window (view distorted by rain)*





*Fig 30. Wye College entrance, 1914. View from east on High Street*



*Fig 31. Wye College: Olantigh Road (east) elevation*





*Fig 32 (left). Agricola Quad: centre of north interior elevation, c. 1912. Fig 33 (right). Agricola Quad: detail of east interior elevation, c. 1914*



*Fig 34. The Dining Hall. East elevation viewed from within Agricola Quad*





*Fig 35. Dining Hall interior*



*Fig 36. The Guinness Laboratory (with gable) and Jubilee Building, viewed from the north-east corner of the churchyard in 2015, before the hoardings went up (Google Earth)*





*Fig 37 (left). Blocked or broken rainwater goods causing masonry decay in the north-east corner of Cloister Quad. Fig 38 (right). Damage caused by water ingress in the Dining Hall*



*Fig 39. Students with “gumboots and gowns” in the 1950s (reproduced in Richards, 1994)*



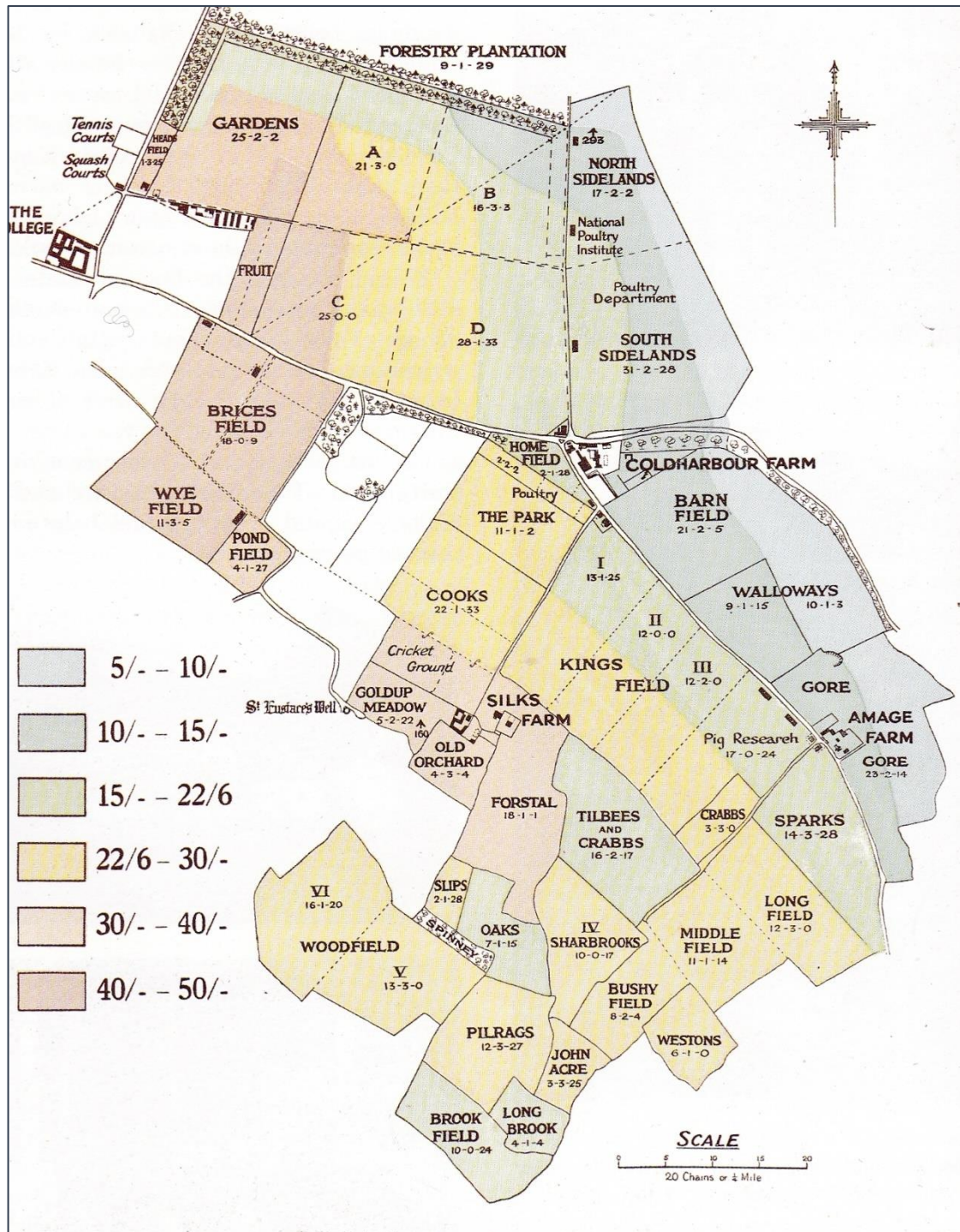


Fig 40. The extent of the Agricultural College's farms, c. 1939





*Figs 41 and 42 (left-right). First and Second World War memorials in Cloister Quad*



*Fig 43 (left). Inscription in Middle Quad commemorating First World War work. Fig 44 (right). Jones memorial sundial*

## Appendix 3. Heritage planning policy context

- A3.1 This section contains the national and local policies for the protection of the historic environment that are relevant to the consideration of this appeal.
- A3.2 When applications 17/00567/AS and 17/00568/AS were first submitted, the relevant policy context comprised the NPPF, the Ashford Borough Council Core Strategy 2000, the Tenterden Rural Sites DPD (TRSDPD) and the Wye Neighbourhood Plan 2015–2030 (WNP).
- A3.3 The Core Strategy and the TRSDPD were subsequently replaced by the Ashford Local Plan 2030 (adopted February 2019). The present policy position comprises the policies of the NPPF, the Ashford Local Plan 2030 (adopted February 2019) and the Wye Neighbourhood Development Plan 2015–30 (WNP; adopted March 2016). The only current site-specific policies are WNP Policies WNP6 and WNP11.

### Primary legislation

- A3.4 Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require local planning authorities, in considering whether to grant listed building consent, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.
- A3.5 Section 72 of the Act requires local planning authorities, in considering whether to grant planning permission with respect to any buildings or other land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

### National Planning Policy Framework (February 2019)

- A3.6 The guidance in Section 16 of the NPPF, *Conserving and enhancing the historic environment*, advises how local planning authorities should determine applications for development that would affect heritage assets.

Para. 184 recognises that heritage assets are an irreplaceable resource, which “*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*”

Para. 189 explains how an applicant should describe the significance of any heritage assets affected by proposed development, 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.*”

Para. 190: “*Local planning authorities should 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. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal.*”

Para. 191: “*Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*”

Para. 192. “*In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.”*

Para. 193. *“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) [...]”*

Para. 194. *“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. [...]”*

Para. 195 deals with proposals that would lead to substantial harm, and is not applicable in this case.

Para. 196. *“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.”*

Para. 200. *“Local planning authorities should look for opportunities for new development within Conservation Areas [...] and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*

## National: Planning Practice Guidance 2019

- A3.7 Government provides online Planning Practice Guidance (NPPG) which includes guidance on *“Decision-making: historic environment”*, revised on 23 July 2019.

This sets out the general principle that: *“Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past, and the ability to record evidence of our past should not be a factor in deciding whether the complete or partial loss of a heritage asset should be permitted.”* (Para. 002 Reference ID: 18a-002-20190723)

- A3.8 The NPPG expands on the NPPF definition of significance to explain why “significance” is important in decision-making: *“Heritage assets may be affected by direct physical change or by change in their setting.”* (Para. 007 Reference ID: 18a-007-20190723)

Views are not the only thing to take into account in considering impact on setting: *“the way in which we experience an asset in its setting is also influenced by... our understanding of the historic relationship between places.”* (Para. 013 Reference ID: 18a-013-2019072)

- A3.9 Under “What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?” the NPPG advises:

*“If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one [...]”* (Para. 015 Reference ID: 18a-015-20190723)



- A3.10 Under “What is meant by the term public benefits?” the NPPG advises that they:
- “... could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (para. 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.*

*Examples of heritage benefits may include:*

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation (Para. 020 Reference ID: 18a-020-20190723)*

## National: Historic England Guidance

### Conservation Principles

- A3.11 *Conservation Principles* provides guidance that is helpful in considering the proposal to reveal the medieval roof in the north range of Kemp’s College:

Para. 13. *“Restoration to a significant place should normally be acceptable if:*

- a. the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost;*
- b. the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence;*
- c. the form in which the place currently exists is not the result of an historically-significant event;*
- d. the work proposed respects previous forms of the place;*
- e. the maintenance implications of the proposed restoration are considered to be sustainable.”*

### Managing Significance in Decision-Taking in the Historic Environment

- A3.12 *Historic Environment Good Practice Advice in Planning 2. Managing Significance in Decision-Taking in the Historic Environment* (HE 20165; GPA2) has this advice on curtilage structures:

Para. 15. *“Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (i.e. the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance [...]”.*

### The setting of heritage assets

- A3.13 *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets* gives advice on assessing the impact of proposals on setting:

and sets out a five-step staged approach to proportionate decision-taking, of which the first three steps are:

**Step 1:** Identify which heritage assets and their settings are affected.

**Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

**Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it. (HE 2017; GPA3, para. 8)

Para. 5. *“Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views [...].”*

*“[Setting’s] importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.”*

### Local: the Ashford Local Plan to 2030

A3.14 The Ashford Local Plan (ABCLP; adopted February 2019) is the main statutory development plan for the Borough to 2030.

A3.15 The vision for Ashford Borough in 2030 includes: *“Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets.”*

Policy SP6 - Promoting High Quality Design includes: *“Development proposals should show how they have responded positively to the design policy and guidance, including national and local design guidance, relevant Neighbourhood Plans, Village Design Statements and site specific development briefs.”*

A3.16 Chapter 9 The natural and built environment provides the policy framework for the promotion, enhancement and protection of the heritage of the borough.

Para. 9.125. *“the Council will support proposals which put listed buildings to viable use consistent with their conservation.”*

A3.17 Policy ENV13 Conservation and Enhancement of Heritage Assets states:

*“Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.*

*“[...] Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.”*

A3.18 Policy ENV14 - Conservation Areas states:

*“Development or redevelopment within Conservation Areas will be permitted provided such proposals preserve or enhance the character and appearance of the Area and its setting.”*

## Local: Wye Neighbourhood Plan

- A3.19 The Wye Neighbourhood Development Plan 2015–2030 (the WNP) was adopted in March 2016. It is part of the overall Development Plan for Ashford Borough and a key document for determining land-use planning decisions in the parish.
- A3.20 The WNP repeatedly emphasises the necessity of delivering development of the former Agricultural College sites (WYE 3) in a phased manner in accordance with an agreed masterplan that has been adopted by the Borough as a Supplementary Planning Document (Fig 4.1, Sections 6.2 and 6.4, and Policies WNP6, WNP 9, and particularly Policy WNP11).

*Policy WNP2: “[...] Applications proposing unsympathetic designs which fail to respect the connections between people and places[...] will be refused.”*

*Policy WNP6 is an overarching policy to guide future development of WYE 3: “Development proposals for the WYE 3 site should deliver a mix of uses, including education, business, community infrastructure and some housing [...] Given the scale of the site in relation to the village, such development should be delivered in a phased manner in accordance with a masterplan that has been adopted as a Supplementary Planning Document by Ashford Borough Council.”*

*Policy WNP11 is a detailed site-specific policy for WYE 3, which includes: “development proposals for this site shall, subject to viability: [...]*

*e) Achieve the positive re-use of the Grade 1 and Grade 2 listed, and other unused Edwardian buildings of the former Wye College by a mix of community, residential and business uses.” [...]*

*“Small scale B1 use, live/work units and some residential change of use would also be supported here to encourage the development of a thriving community hub in these historic buildings in the heart of the village.”*

## Appendix 4. Statutory designations

This appendix contains the Schedule of Monuments entry for:

- The medieval college of St Gregory and St Martin at Wye

and the statutory list entries for:

- Wye College, Cloister Quadrangle
- The Latin School, Wye College
- The Wheel House (Junior Common Room) walls and gates attached
- Wye College, Entrance and Hall Quadrangles

## The medieval college of St Gregory and St Martin at Wye

### Overview

Heritage Category: Scheduled Monument

List Entry Number: 1010349

Date first listed: 09-May-1995

### Location

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Wye with Hinxhill

National Grid Reference: TR 05489 46849

### Reasons for Designation

The term college is used to describe a variety of different types of establishment whose communities of secular clergy shared a degree of common life less strictly controlled than that within a monastic order. Although some may date to as early as the tenth century, the majority of English colleges were founded in the 14th or 15th centuries. Most were subsequently closed down under the Chantries Act of 1547. Colleges of the prebendal or portional type were set up as secular chapters, both as an alternative to the structure of contemporary monastic houses and to provide positions for clerics whose services the monastic establishment wished to reward. Some barons followed suit by setting up colleges within their castles, while others were founded by the Crown for the canons who served royal free chapels. Foundations of this type were generally staffed by prebends or portioners (priests taking their income from the tithes, or other income deriving from a village or manor). After 1300, chantry colleges became more common. These were establishments of priests, financed from a common fund, whose prime concern was to offer masses for the souls of the patron and the patron's family. They may also have housed bedesmen (deserving poor and elderly) and provided an educational facility which in some cases eventually came to dominate their other activities. From historical sources it is known that approximately 300 separate colleges existed during the early medieval and medieval period; of these, 167 were in existence in 1509, made up of 71 prebendal or portional colleges, 64 chantry colleges and 32 whose function was primarily academic. In view of the importance of colleges in contributing to our understanding of ecclesiastical history, and given the rarity of known surviving examples, all identified colleges which retain surviving archaeological remains are considered to be nationally important.

The old college buildings, as established by Kemp in 1447, have survived almost unchanged from the 15th century, owing to the condition placed on their sale to Walter Bucler in 1545 that a free school for the poor children of Wye should continue as before. The buildings of the original college foundation - the Old Latin School, the cloister quadrangle and the Wheel Room - have remained in use as educational establishments almost continuously since their foundation. The 15th century buildings have been well maintained, and various rebuilding schemes have allowed the buildings to be adapted for modern use, as well as to maintain their structural integrity. Features existing beneath the buildings will have remained virtually undisturbed from the mid-15th century onwards. Similarly, the areas of garden to the south and east of the cloister quadrangle are likely to have suffered little large scale disturbance compared with other areas of the college which have been extensively redeveloped, and will also therefore contain much archaeological information relating to the college. Although there were an estimated 300 colleges founded by c.1509, only about a quarter of this number remain upstanding. Wye is therefore a rare survival, preserving aspects of medieval architecture along with archaeological information relating to the 15th century and earlier.

## Details

The monument includes the remains of the medieval College of St Gregory and St Martin at Wye, founded in 1447 and situated adjacent to what is now the High Street. The college survives in the form of standing buildings and buried remains. The standing buildings are Listed at Grades I, II and II\*, and all are excluded from the scheduling. The buried remains survive beneath the college buildings and in areas of open space within the monument. These are included in the scheduling. The medieval college building is in the form of a cloister quadrangle where pupils and masters lived and studied and lies to the east of the churchyard. Outbuildings are known to have stood to the east and north of the quadrangle, although these are no longer visible at ground level. The free grammar school was held in the small building to the south of the main college. This was known as the Old Latin School, its purpose being to teach the children of the village Latin and grammar. The main entrance to the college was to the east of the Latin School, guarded by a porter's lodge. The Old Latin School and the porter's lodge have survived almost intact as part of the modern Wye Agricultural College. In February 1432, Cardinal John Kemp applied for, and obtained from Henry VI, licence to found a college for secular priests at Wye. The foundation of the college was, however, delayed by negotiations with the Abbot of Battle Abbey from whom he wished to purchase land at Wye on which to build the college. The foundation of the college, therefore, did not take place until 1447, with the college being given the same dedication as the parish church - to St Gregory and St Martin. The number of pupils appears to have varied, although the maximum is known to have been ten. It is recorded that in c.1535 the gross income of the college was 125 pounds, 15 shillings and fourpence halfpenny. After the Dissolution, the college and all its possessions, which included the manors of Perycourte and Surrenden as well as the rectory and advowson of the vicarage of Broomhill, were surrendered to the Crown Commissioners. This took place on January 19th 1545, and they were subsequently sold to Walter Bucler, the secretary to Queen Catherine Parr, for 200 pounds on condition that he should 'at all times provide and maintain a sufficient school master to teach gratis any children of Wye who should present themselves to him'. However, by 1627 the original conditions were not being met and the estate became vested in the Crown once again, until Charles I granted the college and its possessions to Robert Maxwell Esq. In 1762, as part of Lady Joanna Thornhill's School, the college entered its most prosperous period, with 40 boarders and over 100 day pupils. In 1889 it was sold as a private school, and in 1892 Kent and Surrey Councils combined to establish the South Eastern Agricultural College on the site. The modern college buildings were constructed in 1893-5, 1901, 1903-6 and 1912-14, although this programme of work was not completed until 1928. Various architects were employed, including P B Chambers, T E Colcutt and S Hamp. The 15th century Wheel Room was restored and extended early this century and is now a college common room. The Latin School was partly refaced in red brick, the first floor of the cloister quadrangle was rebuilt in brick, and its timber pentice replaced in c.1740. The Old Latin School and the college cloister quadrangle are both Listed Grade I, while the Wheel Room is a Grade II\* Listed Building, and the surrounding modern college buildings are all Listed Grade II. Since all these structures are in constant use for teaching and accommodation, they are all excluded from the scheduling, although the ground beneath all the buildings is included in the scheduling, as are all areas maintained as gardens. The surfaces of all paths running through the gardens, the metal arches used in the pergola and for other climbing plants in the southern garden, plant labels used in the gardens, and any service trenches or their access points beneath ground surface in the gardens or beneath the buildings are excluded from the scheduling, although the ground beneath and around all these features is included in the scheduling.

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 24356

Legacy System: RSM

### Legal

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Digital, Culture, Media and Sport.

End of official listing



## WYE COLLEGE, CLOISTER QUADRANGLE

### Overview

Heritage Category: Listed Building

Grade: I

List Entry Number: 1275610

Date first listed: 13-Oct-1952

Statutory Address: WYE COLLEGE, CLOISTER QUADRANGLE, HIGH STREET

### Location

Statutory Address: WYE COLLEGE, CLOISTER QUADRANGLE, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Wye with Hinxhill

National Grid Reference: TR 05490 46858

### Details

TR 0446 0546 WYE HIGH STREET (north side)

8/267 Wye College, 13.10.52 Cloister Quadrangle

GV I

College. Founded 1432, occupied by 1448. Founded by Cardinal Archbishop John Kemp. Altered 1739. Timber framed on flint base and clad with red brick, and structural flint and red brick. Plain tiled roofs. The original college consisted of this cloister (domestic ranges and great hall) and detached school house and service building, such as the surviving brewhouse (see items 8 / 265 and 8 / 266 .). South (Old Entrance) front flint ground floor with string course to red brick upper storey with hipped roof, with stacks to centre left and centre right. Five glazing bar sashes on 1st floor, C15 Perpendicular cusped lights on ground floor, 1 pair, 1 triple and 4 single. Central panelled door in pedimented porch with barley sugar columns with bobbin-like capitals (the tomb of Lady Joanna Thornhill in Wye College also has barley sugar columns - she refounded a school in the college 1708). Left return (to churchyard) roughcast on ground floor with 3 light cusped windows to left and to right, with central arched doorway to cloister garth. Glazing bar sashes on brick 1st floor. Other exterior faces now within early C20 quadrangles, that immediately to east showing the moulded arched doorway through to the cloister, with mullioned square headed window over, and the Hall with 2 four-centred arched mullioned windows of the C15, and full height canted bay with 3 tier mullioned and transomed lights, the bay part of early C20 work. Cloister garth: the east wall with 2 depressed arched windows to Hall with brick stack projecting between them (truncated shaft). Originally fully framed, the arcade and gallery over rebuilt 1739 in red brick in English bond, with simple arcaded ground floor, plat band and boxed eaves, with glazing bar sashes on 1st floor. Within the inner wall the original, and fine, moulded C15 doorways survive, with C17 and earlier doors, C15 in some cases? Particularly good the wave moulded doorway with plank and stud door to the staircase. Interiors: Hall: renewed screen passage at southern end, with C15 four centred arched doorways. Four centred arched stone fireplace with fireback dated 1610, possibly the date also of the wainscotting with fluted pilasters and cornice. Crenellated dais beam. Tall octagonal crown posts on moulded tie beams. Fragments of stained glass (Kemp's Arms) in bay window. Parlour (later library): to north of Hall, entered also via cloister by linenfold panelled door in fluted surround to Ante room, with painted wainscotting. Parlour with heavily enriched panelling with foliated and scrolled pilasters, grotesque heads on bifurcated frieze with dragon motifs. Heavily carved and enriched beams. Stone fireplace carved in same manner as panelling with linenfold panel overmantel Structurally C15, decoratively late C16, the bay window and bookshelves c.1900 (and 1980). Staircase: (in the

north range) C17 open well with half-landing, with heavily moulded rail on turned balusters with moulded string, and great doubled newels, acting as pedestals for statuettes (nearly naked figures now kept in other rooms in the old part of the College). The top flight becomes a newel stair. The timber framed structure apparent in the upper floor, with crown posts throughout, with octagonal capitals and bulbous bases. Upper rooms with double arcaded panelled overmantel and bead moulded wainscotting with strapwork frieze (over the Parlour range). Modern chapel formed at west end of range, behind the stair. South cloister range: Senior common room. Enriched stone fire- place and moulded beams. Simple C18 stair (to pedimented south entrance doorway), with wreathed rail and geometric plan. Northbourne room: decorated C18 with doors of 6 raised and fielded panels, with wainscotting. Stained glass dated 1346, 1546 and HW 1635. Upper rooms (offices and bedrooms) with simple C18 and C17 panelling (arcaded overmantel, fluted pilasters and carved plinth in office). Some exposed panelling. The college founded by Kemp was for a Master, a Master of Grammar, 6 clerks and 2 choristers. Dissolved 1545 and sold to private hands, always with the proviso that the Grammar School be maintained (see the Latin School), item 8/266 ), the south side of the cloister was used as the Master's residence. From 1708 the northern half of the College was used for Lady Joanna Thornhill's Charity school. In 1724 the 2 schools were divided the buildings, bought 1892 (and expanded) by Kent and Surrey County Councils as agricultural college, now the Agricultural Department of the University of London. (See B.O.E. Kent II 505-6; Hasted VII, 354 ff).

Listing NGR: TR0547446856

### Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 411818

Legacy System: LBS

### Sources

Books and journals

Hasted, E, History and Topographical Survey of the County of Kent, (1801), 354

Newman, J, The Buildings of England: North East and East Kent, (1976), 505-6

### Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

## THE LATIN SCHOOL WYE COLLEGE

### Overview

Heritage Category: Listed Building

Grade: I

List Entry Number: 1217080

Date first listed: 13-Oct-1952

Statutory Address: THE LATIN SCHOOL WYE COLLEGE, HIGH STREET

### Location

Statutory Address: THE LATIN SCHOOL WYE COLLEGE, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Wye with Hinxhill

National Grid Reference: TR 05464 46834

### Details

TR 0446 0546 WYE HIGH STREET (north side)

8/266 The Latin School 13.10.52 Wye College

GV I

Schoolroom. Circa 1445 for Cardinal Archbishop John Kemp. Flint, in part refaced with red brick. Plain tiled roof. Single storey with hipped roof, and with 2 paired and 1 single four centred arched and label-hooded lights to road front, boarded door to left return with cusped light, both with label heads, and moulded doorway to right return. Wooden casements (in outshot) to north side. Interior: fireplace similar to that in the Parlour, Old Wye College; four centred ovolo moulded with fernleaf spandrels, with refined florid strapwork overmantel. Ogee headed panelled wall cupboards below the central window to south. Probably originally twice the size to north (hence the brick rebuilding). Built as, and used even after Dissolution, the Grammar School for both Kemp's original College and the Grammar School which succeeded it. (See B.O.E. Kent II, 506; Hasted VII 354 ff).

### Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 411817

Legacy System: LBS

### Sources

Books and journals

Hasted, E, History and Topographical Survey of the County of Kent, (1801), 354

Newman, J, The Buildings of England: North East and East Kent, (1976), 506

### Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing



## THE WHEEL HOUSE (JUNIOR COMMON ROOM) WALLS AND GATES ATTACHED

### Overview

Heritage Category: Listed Building

Grade: II\*

List Entry Number: 1275530

Date first listed: 27-Nov-1957

Statutory Address: THE WHEEL HOUSE (JUNIOR COMMON ROOM) WALLS AND GATES  
ATTACHED, HIGH STREET

### Location

Statutory Address: THE WHEEL HOUSE (JUNIOR COMMON ROOM) WALLS AND GATES  
ATTACHED, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County:

District: Ashford (District Authority)

Parish: Wye with Hinxhill

National Grid Reference: TR 05492 46833

### Details

TR 0446 0546 WYE HIGH STREET (north side)

8/265 The Wheel House 27.11.57 (Junior Common Room) walls and gates attached

GV II\*

Brewhouse, now common room. C15, restored and extended (walls etc) C20. Ragstone rubble with plain tiled roof. Single storey rectangular block with hipped roof with stack to west side and louvre-dormers. Triple arched window to road front (south). Interior with roof of 2 large plain crown posts braced to ties and to collar purlin. On the road front are a rubble wall to left, about 5 feet high, some 30 yards long to the Latin School, with arched gateway and stepped gable. To right an iron gate in four centred arched gateway with label hood and raised surround. Beyond an early C20 hipped outhouse of rubble with tiled roof.

Listing NGR: TR0549046827

### Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 411816

Legacy System: LBS

### Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

## WYE COLLEGE, ENTRANCE AND HALL QUADRANGLES

### Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1217079

Date first listed: 13-Oct-1952

Statutory Address: WYE COLLEGE, ENTRANCE AND HALL QUADRANGLES, HIGH STREET

### Location

Statutory Address: WYE COLLEGE, ENTRANCE AND HALL QUADRANGLES, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Wye with Hinxhill

National Grid Reference: TR 05521 46849

### Details

TR 0446 0546 WYE HIGH STREET (north side)

8/264 Wye College, Entrance and Hall 13.10.52 quadrangles

GV II

College quadrangles. 1893-5, 1901, 1903-6 and 1912-14 (executed 1928) Architects P.B. Chambers (1893-5), T.E. Colcutt (1901) and Colcutt and Hamp (1905-6/1912). Ragstone with red brick over, and with timber framing with red brick infill. Plain tiled roof. Entrance: 2 storey range with kneelered parapet gables and projecting central gabled gateway; stacks to end left, centre left and to right. Ten mullioned lights on 1st floor (pairs and triplets), and cusped and with label hoods on ground floor. Four centred arched gateway with label hood, and 3 light Perpendicular style windows over. Right return (the library) with 2 storey brick range with mullioned and transomed lights broken only by oriel to centre left. Inner court: rear of entrance block with exposed timber frame over open timber arcade. Pierced and moulded barge-board to jettied gable with oriel over gateway. Brick inner wall with mullioned windows. Two storey brick ranges opposite (the library, with barrel vault ceiling interior, with gable and oriel opposite entrance. Second count including exterior of C15. Hall range (with C20 bay as also to parlour) and 2 storey C20 blocks, brick on flint, with some C18 with glazing bar sashes, otherwise mullioned windows. Four centred arched gateway with iron screen dated 1906. Dining Hall 1910, built as gymnasium, separating the 2 quadrangles. Single storey, with large mullioned and transomed windows with parapet and buttresses. Interior: cruck trussed and arcaded interior with contemporary panelling and chandeliers and other fittings. Further, later C20 quadrangles and blocks to the north. (See Orwin and Williams, Wye Church and Wye College).

Listing NGR: TR0552146849

### Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 411815

Legacy System: LBS

### Sources

Books and journals

Orwin, Williams, Wye Church and Wye College

### Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

## Appendix 5. Consultation response: Historic England

Letter Tom Foxall (HE) to Mark Chaplin (ABC), 26 May 2017. HE Ref. L00569440. Advice in response to application consultation.





Historic England

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Mr Mark Chaplin  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
Ashford  
Kent  
TN23 1PL

Direct Dial: 01483 252035

Our ref: L00569440

26 May 2017

Dear Mr Chaplin

**Arrangements for Handling Heritage Applications Direction 2015  
& T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**FORMER WYE COLLEGE BUILDINGS, HIGH STREET, WYE, ASHFORD, TN25  
4AH**

**Application Nos 17/00568/AS & /00567/AS**

Thank you for your letters of 19 April 2017 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

**Summary**

Wye College consists of an outstanding collection of medieval college buildings (all of which listed at either grade I or II\*) that were used after the Dissolution as a school and house. They were then converted in the late nineteenth century to create an agricultural college, which expanded rapidly to form numerous additional quadrangles of accommodation, much of which now listed at grade II. The agricultural college closed in 2008 and has since been out of use.

Historic England supports in principle the current application to convert the listed college buildings to mainly residential use and some shared and community facilities. There is nonetheless considerable detail still to be provided, much of which needs in our view to be resolved before determination of the current application.

We recommend that the following further details should be sought before this application is determined:

- A detailed scheme for restoration of the seventeenth-century open-well staircase and stairwell, including reinstatement of the Ancient Britons statues;



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- Details explaining proposed physical works to the great hall - the replacement of its floor covering, for example;
- Further detail and justification for upgrading the existing partition between Unit 17 and the great hall;
- A more detailed proposal for the creation of Unit 32, including large-scale existing, proposed and demolition plans and sections;
- Details explaining future access to the gallery in the great hall;
- The scope and detail of a scheme for public access and future maintenance of the un-converted parts, including the great hall, seventeenth-century staircase and lecture theatre.
- An explanation of how the individual units would be serviced and separated for fire and sound transmission, and the effects of these works on the significance of the listed buildings;
- A list of works potentially affecting the scheduled monument.

Providing that the above matters can be resolved to the satisfaction of your Council and Historic England, we would be willing for listed building consent to be granted subject to the conditions described below and a S106 Agreement securing the heritage benefits of the scheme.

### Historic England Advice

#### Significance

The medieval college at Wye was founded in 1447 by Archbishop John Kempe. The rare and impressive substantial surviving parts of this college, including stone ranges with elaborate timber roofs, are set around a small quadrangle (Cloister Quad) and in two separate buildings to the south: the Wheel Room, possibly originally a Brewhouse (grade II\*); and the Latin School (grade I), built from the outset as a school. This group of buildings is of outstanding significance for its architectural interest and for the ways in which its rare and unusually well-preserved fabric illustrates the arrangement and use of a fifteenth-century chantry college. This outstanding significance is reflected in the grade I listing of the entire Cloister Quadrangle. The ground beneath and around these buildings (covering the complete south-western quadrant of the site) is also a scheduled ancient monument.

After 1545, the college buildings were converted into a school and master's house. The most notable additions to the other buildings when in domestic use date from the early eighteenth century, when the brick arcading in the Cloister Quad was constructed, and the early seventeenth-century, when panelling and chimneypieces were installed in the former parlour and solar (at the northern end of the great hall), and when the great dog-leg staircase was installed in the northern range. The staircase is of such size and grandeur that it almost bursts out of the constrained stairwell in which it was placed, but its original vibrant painted decoration has been



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over-painted and the outstanding and complete set of carved Ancient Britons statues originally arranged across its many substantial newels have since been moved to another part of the college.

An agricultural college was established in 1892, after which a rapid period of expansion saw the creation of four further quadrangles, all of which now covered by a separate grade-II listing. The most notable feature of this phase of development is the precipitously-raked lecture theatre directly to the north of the medieval ranges. The buildings which constitute the twentieth-century expansion of the college northwards (i.e. to the north of the east-west footpath running from Olantigh Road to the churchyard) are of only modest historic and architectural interest.

### The current application - general

The agricultural college closed in 2008 and its buildings have since fallen out of use. Although some maintenance has continued, the buildings are showing signs of fatigue and are in need of repair and re-use. The current application proposes to convert the buildings to predominantly residential use, but with a heritage centre (relocated from the Latin School and expanded), and a degree of public access.

The majority of the post-1892 college buildings are cellular in nature and relatively plain internally. We think they are therefore capable of subdivision into residential units of various sizes with only modest impacts to their significance, but we defer to your Council to agree the detail for these areas. We also do not object in principle to demolition of the unlisted buildings at the northern end of the site and the provision of suitably-designed parking areas in this location.

There will nonetheless be some negative impacts to the significance of the listed buildings, for example from the subdivision of some of the more impressive spaces (e.g. the dining hall of 1906) and the dilution of the overall coherence and institutional character of the buildings. The introduction of services (boilers, flues and plumbing fixtures etc) also has the potential to be harmful unless very carefully handled, for which broad details should be provided before determination and full details by condition of any consent. We nonetheless think that these impacts are capable of being reduced through design (in accordance with para 129 of the NPPF) and, when balanced against the heritage benefits described below, have the potential to result in a net positive effect on the significance of the buildings. An appropriate means of securing these benefits (e.g. a S106 agreement) will be required.

### The current application - detail

#### - *The Latin School (I)*

No alterations are currently proposed to the Latin School and we do not object to the



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principle of re-using it as ancillary accommodation to Unit 18.

- *The Wheel Room (II\*)*

The Wheel Room is proposed to be converted to form open-plan kitchen/dining/living accommodation for a two-bed apartment (Unit 20). The removal of the modern bar at its northern end and the consequent reinstatement of this room to a single volume would be beneficial. Any alterations required to its western windows to allow privacy to/from the adjacent units would need to be controlled by condition. Further details will also be required by condition to explain the making good of the external walls where removal of a small modern extension on the west side is proposed.

- *The Cloister Quad (I): the north, west and south ranges*

The south and west ranges of the Cloister Quad were for a very long period in residential use before the site became an agricultural college and these continue to suit residential use if carefully handled. The proposed plans for Unit 18 are largely respectful of the existing partitions and where new ones are proposed (e.g. to form new en-suite bathrooms at first-floor level) we do not think they are harmful. Some former doorways are proposed to be re-opened, which requires sensitivity and careful design (see U18 in CAT's *Historic Buildings Impact Assessment* and my suggested conditions below).

Further consideration nonetheless needs to be given to how the minstrels' gallery in the great hall, currently only accessible from the first floor of the south range, could be reached in future, ideally without having to pass through private accommodation. We also think that a condition should be applied to any consent to ensure that the roof structure of this southern range is made accessible and recorded during the course of works (see suggested conditions below).

The most notable alterations proposed by this scheme are to the northern range. We are content in principle with the proposed conversion of the parlour (directly to the north of the great hall -Unit 17), but it would not be possible to upgrade the partition between parlour and great hall without serious harm to its significance. We would therefore expect to see further detail and justification for this work before the application is determined.

There are also proposed changes offering opportunities for revealing and enhancing heritage significance, and therefore for delivering some of the heritage benefits described above. More detailed information will need to be provided to explain these works, to maximise the benefits and to minimise the risk of inadvertent loss of significant historic fabric. The two most important opportunities for enhancements in this northern range are: the opening-up of the fine crown-post roof in Unit 32; and the restoration of the early seventeenth-century staircase.



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The proposal for Unit 32 needs to be shown in far greater detail than has so far been provided. We recommend that large-scale existing, proposed and demolition plans should be provided along with detailed section drawings before the application is determined. These will need to be capable of being cross-referenced against CAT's marked-up plans for the Cloister Quad.

The evolution of the Cloister Quad is very complex. Canterbury Archaeological Trust's report accompanying this application expertly unpicks the numerous layers of alteration and explains the building's evolution to a much greater extent than has ever been articulated before. However, there is still considerable further potential for understanding this outstanding building. Additional evidence is likely to be concealed, for example, behind modern partitions, which will need to be recorded and analysed as part of an archaeological watching brief during the course of their removal (see my suggested conditions below).

Opportunities should also be taken as part of these works to enhance and better reveal the significance of the seventeenth-century staircase. We strongly recommend that the Ancient Britons statues are reinstated to the staircase newels and a proposal for restoration of the staircase and stairwell (including re-lighting of this space) should form part of this application. The staircase should remain in the 'common parts' of the complex, as is currently shown, and therefore not within an individual flat. This work would constitute another of heritage benefits referred to above.

### - *The scheduled ancient monument*

The south-western quadrant of the application site is a scheduled ancient monument. The listed buildings are excluded from the scheduling, but the ground beneath them is included and so is much of the ground around them. Any disturbance in the scheduled area is likely to require scheduled monument consent. It would be helpful at this stage for the applicant to contact us to explain where any ground disturbance in the scheduled area may occur so we can advise accordingly on any need for consent.

### Securing the Benefits

The reinstatement of the Ancient Britons statues to their original locations, the restoration of the seventeenth-century staircase and the revealing of the medieval roof above Unit 32 are all heritage benefits capable of outweighing the negative effects of the scheme described above. Another key heritage benefit in this case would be the provision of public access to the key historic elements of the complex. At a minimum we recommend that the staircase, great hall and lecture theatre should be made accessible to the public on a set number of days per year in perpetuity and advertised accordingly. We suggest that this should include Heritage Open Days and on other specified days by appointment. The lecture theatre should also be made available for



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public lectures and other appropriate events. We would expect a proposal explaining such an arrangement for public access to be submitted as part of the current application.

We think that the balance of impacts in this case could result in a net positive effect on the significance of the listed building, meaning that paragraph 134 of the NPPF would not need to be applied. However, for this to happen the benefits would need to be tied to the development by means of a planning agreement, such as a S106 Agreement. We would be happy to discuss the wording of a S106 agreement with you in due course.

#### Recommendation

We recommend that the current application should not be determined until the additional information described above has been provided. When that information has been provided and accepted by your Council and Historic England, we would be able to recommend that listed building consent is granted, subject to the following conditions:

- No works authorised by this consent shall take place until a programme of building recording and analysis of the listed buildings (including the roof structure of the Cloiser Quad's southern range) has been undertaken by a person or body approved by the Local Planning Authority and that programme shall accord with a written scheme submitted to and approved in writing by the Local Planning Authority.
- Before any work is commenced, the position, type and method of installation of all new and relocated services and related fixtures (for the avoidance of doubt this includes communications and information technology servicing, plumbing, pipes, soilstacks, flues, vents and ductwork), shall be specified and agreed in writing with the Council wherever these installations are to be visible, or where ducts or other methods of concealment are proposed. Any works shall be implemented only in accordance with such approval.
- Before the relevant work is begun, details in respect of the following shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out in full in accordance with such approved details:
  - the design of the proposed new doors and doorways in bedrooms 3 and 4 of Unit 18, shown at a scale of 1:5 or larger, including details explaining how these will be formed and their relationship to existing historic fabric;
  - details of how the western doorway in Unit 17 would be blocked.
  - details of any upgrading of existing partitions, floors and ceilings for fire and acoustic separation;



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- details of any alterations to existing windows and doors, including for reasons of privacy;
- details of any new doors and windows;
- a 1 sq metre sample panel of any new areas of brickwork, stonework and roofing.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of the NPPF. In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.



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## Appendix 6. Extract from Ashford Borough Council - Report of Head of Development Management and Strategic Sites

Planning Committee 20 June 2018

Application Number 17/00568/AS

The text on the following pages is extracted from the officer's report to the planning committee considering the listed building consent application. It is the section that deals with the proposal to remove seventeenth-century fabric from the north range of Cloister Quad and partially reveal the medieval roof.

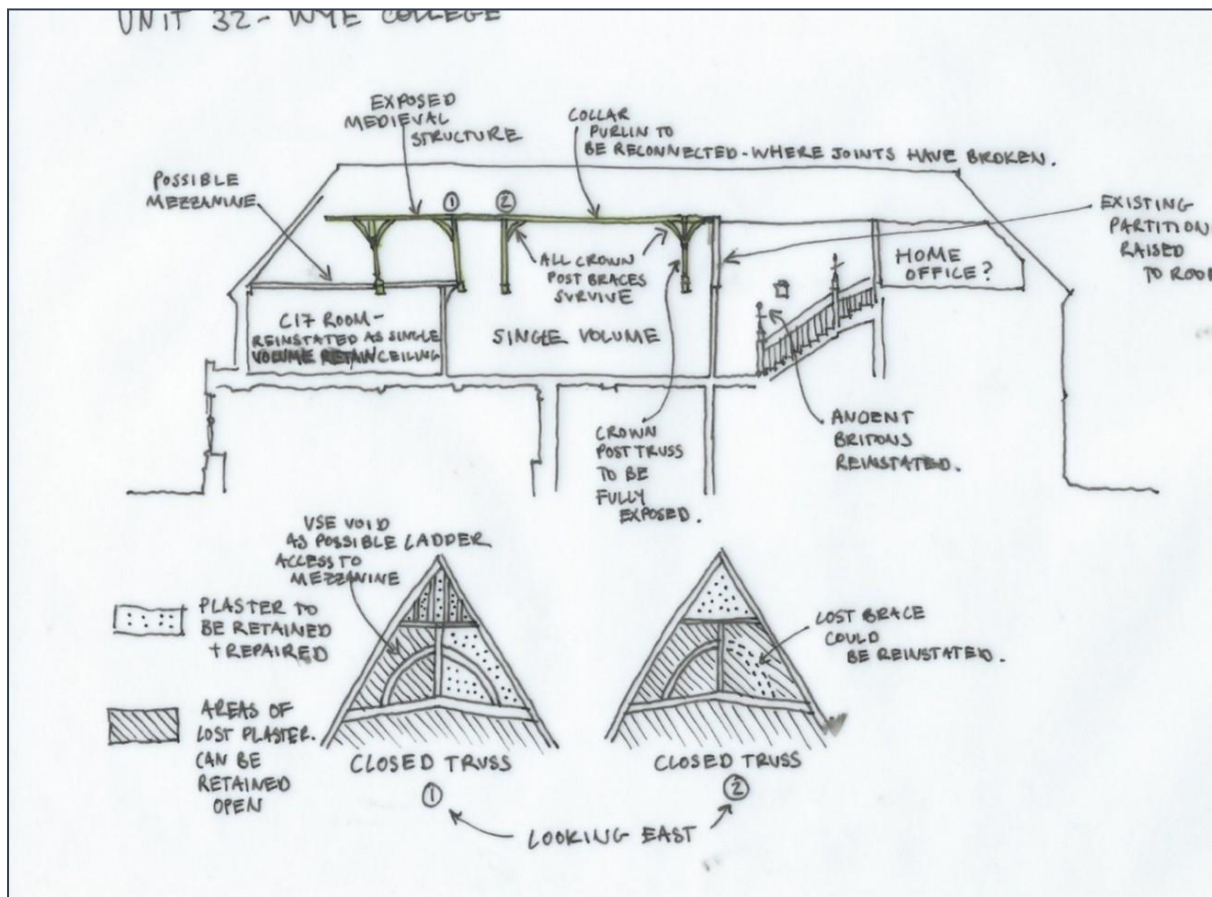


58. The staircase is intended to provide access to the only flat provided in the Cloister Quad, which is situated on the first floor of the north range and includes the solar and the area that was once the open dormitory. The solar retains the C17 high quality panelling, a fire surround and ceiling construction, which were inserted as part of the conversion to a dwelling. This room, with its C17 re-decoration, is considered to be of high significance and will be retained in its current form, with the panelling restored and a modern partition, which clumsily bisects the space, removed. The first floor dormitory was also altered in the C17, with the insertion of the staircase and subdivision into rooms, with the attic floored over to create a garret, or storage space. Unfortunately, these rooms have not retained their C17 adaptations, like the Solar, but rather were further altered in the C19 and C20, resulting in little historic fabric surviving. The conversion to a flat involves some reordering of this space. Although there may be hidden evidence, this can only be guessed at until some uncovering has been carried out. The potential for loss of mediaeval or C17 fabric as part of the conversion can only be guessed at and conditions will be required to ensure that opening up is carried out and adequate recording is carried out. In principle, the reordering of the layout of the first floor of the north range can probably be achieved without serious harm to significant historic fabric. The real “harm” to the conversion of this area of the building, is the permanent separation (in terms of use and accessibility) of the mediaeval solar from the parlour. The retention of the first floor of the north range as communal use, in connection with the ground floor was pursued, but was not accepted by the applicant on the grounds that the loss of the unit made the scheme unviable and there was a lack of “need” for such a degree of communal use.
59. At attic level there remains a C17 garret at the top of the staircase. This will be retained as accommodation or storage in connection to the new unit. Beyond this garret is the rest of the attic space over the north range. Within this attic space you can see the mediaeval roof construction, in almost its original form, comprising a series of crown posts and trusses, which would have originally decorated the dormitories and solar below, before the C17 ceiling was inserted. In the C17 several partitions were inserted into this attic space to create a room with lime plaster on the inside, although its original function is unclear. The attic space was altered during the C19 and C20 with the partial removal of the C17 ceiling, to create a half vaulted ceiling over the rooms below. This has inevitably compromised the value of the C17 adaptations in this area.
60. The significance of the survival of the mediaeval crown post roof range was identified by Historic England as being an opportunity for “revealing and enhancing heritage significance” and they suggested that it should be exposed as part of the conversion. The exposure of the roof construction would involve the removal of historic fabric, the most notable of which is what remains of the C17 ceiling and the attic room. The established conservation approach to the evolution of buildings is normally to allow the successive building periods to remain as evidence of the changes that have occurred to the building over time. However, there are rare occasions when the original fabric is considered to be of such outstanding interest, that it takes precedence over historic fabric that is considered to be less significant, or Ashford Borough Council compromised and it is considered acceptable to remove this later historic fabric in order to expose an earlier part of the building. With this in mind, a scheme has been put forward by Historic England, which seeks a compromise of keeping the most significant parts of the C17 adaptations and sacrificing others which have been compromised by later adaptations and so which can be considered to be of less historic significance. The sketch included below, illustrates their suggestion. This scheme retains the C17 ceiling over the solar (so as to preserve its fine decoration scheme) and to retain the C17 stair and stairwell, although it will need to be increased in height up to the rafters, to provide separation with the residential unit. In

between this stairwell and the solar, all of the remains of the C17 ceiling and attic room are to be removed and the mediaeval roof construction exposed and repaired. This acceptability of this aspect of the scheme is debatable, perhaps even controversial.

- It is undeniable that the surviving mediaeval roof form is exceptional and deserves wider appreciation.
- However, the mediaeval first floor layout is not being recreated to reflect the roof construction. This is partly because the C17 staircase and modified solar are being retained and partly because the first floor was extended in the C18 when the cloister, below, was rebuilt in brick. The question is: does this partial reinstatement diminish the overall objective of opening-up?
- The loss of early historic fabric, in this case C17, is a difficult one to reconcile with the gain.

61. Therefore, the loss of historic fabric, which is admittedly incomplete must be weighed against the exposure of the mediaeval roof form, which at best, can only a partial reinstatement. However, Historic England are enthusiastic over this aspect and are satisfied that in this instance, the benefits outweigh the losses.



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First draft issued: 21 September 2020

Second draft issued: 7 December 2020

Third draft issued: 24 December 2020

Fourth draft issued: 30 December 2020

Final issued: 1 January 2021

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