



LAND AT APPLIEDORE ROAD,
TENTERDEN, KENT

HERITAGE STATEMENT

PREPARED BY PEGASUS GROUP
ON BEHALF OF WATES DEVELOPMENTS LTD.

P21-0651 | APRIL 2021



Document Management				
Version	Date	Author	Checked/approved by:	Reason for revision
1	23rd April 2021	JT/GS	GS	-

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DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE

HERITAGE STATEMENT

**LAND BETWEEN APPLEDORE ROAD AND WOODCHURCH ROAD,
TENTERDEN, KENT**

ON BEHALF OF: WATES DEVELOPMENTS LTD

Prepared by: Jonathan Turnock and Gail Stoten

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1. Introduction

- 1.1 Pegasus Group have been commissioned by Wates Developments Ltd to prepare a Heritage Statement to consider the proposed residential development of land between Woodchurch Road and Appledore Road, Tenterden, Kent, as shown on the Site Location Plan provided at Plate 1 (below).
- 1.2 The site has a very small area of overlap with the eastern boundary of the Tenterden Conservation Area, and lies near to the Grade II Listed Stace House and Grade II Listed Craythorne which are both 18th-century dwellings.
- 1.3 This Heritage Statement provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 189 of the Government's National Planning Policy Framework (the NPPF¹) which requires:
- 1.4 In order to inform an assessment of the acceptability of the scheme in relation to impacts to the historic environment, following paragraphs 193 to 197 of the NPPF, any harm to the historic environment resulting from the proposed development is also described, including impacts to significance through changes to setting.
- 1.5 As required by paragraph 189 of the NPPF, the detail and assessment in this Report is considered to be "*proportionate to the asset's importance*".³
- 1.6 The archaeological potential of the site is assessed in a separate report (CgMs 2021), as is the Historic Landscape of the site (RPS 2021). These reports are referenced where appropriate within this report.

*"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."*²

¹ Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, February 2019).

² MHCLG, *NPPF*, paragraph 189.

³ MHCLG, *NPPF*, paragraph 189.



Plate 1: Site Location Plan.

2. Site Description and Planning History

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



Plate 2 Looking north-west across the western area of the site



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



Plate 4 Looking south-east across the eastern side of the site

2.2 The site is traversed by a public right of way AB12 running broadly north-west to south-east.

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

Site Development

2.4 Historic map regressions have been prepared for the site as part of an Archaeological Desk Based Assessment (DBA), and Historic Landscape Assessment (RPS 2021 and CgMs 2021).

2.5 The salient points regarding the historic development of the site

can be summarised as follows:

- **Andrews and Drury’s map of 1769 records the site as undeveloped land beyond the East Gate of Tenterden. An area within the eastern part of the site may have possessed a heathland character at that time.**
- **John Adam’s map of 1822 indicates that the site had been partitioned into several parcels of agricultural land and sparsely interspersed with pits or ponds, which may be indicative of post-medieval mining activity.**
- **The 1843 tithe map for the parish of Tenterden records that most of the site was used for pasture. The vast majority of the site was then owned and occupied by Elizabeth Manclarke, with only two of the southernmost parcels being in separate ownership and tenancy (being owned by Sir Edward Hales and occupied by William Daw).**
- **The First Edition (1870) Ordnance Survey records some new built development within the westernmost part of the site, with these new buildings perhaps corresponding with former agricultural buildings. The remainder of the site evidently remained in agricultural use, with a labelled ‘sheepfold’ being indicative of the continued pastoral use of the site.**
- **Subsequent maps and aerial photographs illustrate no notable changes, with only minor changes to field boundaries. One of the southernmost parcels of the site is currently used as a playing field.**

Planning History

- 2.6 A review of the recent planning history records held online by Ashford Borough Council has indicated two applications which are relevant to the current proposals.
- 2.7 The site was the subject of a 2019 hybrid planning application (LPA ref. 19/01788/AS) which sought outline permission for the development of up to 250 residential dwellings on the site (including associated works) and full planning permission for a change of land use from agricultural land to a country park and formal sports pitches (including the construction of a pavilion and associated works).
- 2.8 This application was refused by Ashford Borough Council on 23rd September 2020. The third reason for refusal made reference to the Tenterden Conservation Area, as follows:

"3. The proposed western site access would result in the loss of two mature trees located on Appledore Road within and at the entrance to the Tenterden Conservation Area. These trees are a component part of the visual character of Appledore Road as it enters Tenterden and their loss would be detrimental to the character of Appledore Road and harmful to the character of the conservation area, contrary to policies ENV14, SP1 and SP6 of the adopted Ashford Local Plan 2030. It is not considered that this detrimental impact can be adequately mitigated."

- 2.9 The two trees mentioned in this reason for refusal are retained in the proposed scheme.
- 2.10 An earlier 1987 application for full planning permission to erect 124 dwellings and garages with access from Appledore Road on the western part of the current application site was also refused and dismissed at appeal (LPA ref. 87/00259/AS).

3. Proposed Development

3.1 The application is a hybrid application including an outline application for the development of up to 145 residential dwellings (50% affordable) including the creation of access points from Appledore Road (1 x all modes and 1 x emergency, pedestrian, and cycle only) and Woodchurch Road (pedestrian and cycle only), and creation of a network of roads, footways, and cycleways through the site. Provision of open space including children's play areas, community orchard, sustainable drainage systems, landscape buffers and green links all on 12.35 ha of the site. (Matters for approval: Access)

3.2 Full planning permission is also sought for the change of land use from agricultural land to land to be used as a country park (8.66 ha), and land to be used as formal sports pitches (3.33 ha), together with pavilion to serve the proposal and the surrounding area. Including accesses, ancillary parking, pathways, sustainable drainage systems and associated landscaping.

4. Methodology

4.1 The aims of this Heritage Statement are to assess the significance of the heritage resource within the site, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant. This assessment considers built heritage.

Sources

4.2 The following key sources have been consulted as part of this assessment:

- **The National Heritage List for England for information on designated heritage assets;**
- **The Heritage Strategy prepared by Ashford Borough Council;**⁴
- **The Tenterden Archaeological Assessment prepared as part of the Kent Historic Towns Survey;**⁵
- **Historic maps available online;**
- **Aerial photographs available online; and**
- **Modern satellite imagery accessible via Google**

⁴ Ashford Borough Council, Heritage Strategy (October 2017).

Earth Pro.

4.3 Heritage assets in the wider area were assessed as deemed appropriate (see Section 6).

Site Visit

4.4 Site visits was undertaken by the Executive Director of Heritage at Pegasus Group on 5th March and 8th April 2021, during which the site and its surrounds were assessed. Selected heritage assets were assessed from publicly accessible areas.

4.5 The visibility on these days was clear. Surrounding vegetation was not fully in leaf at the time of the site visits and thus a clear indication as to potential intervisibility between the site and the surrounding areas could be established.

Assessment of significance

4.6 In the NPPF, heritage significance is defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of

⁵ English Heritage and Kent County Council, *Kent Historic Towns Survey: Tenterden Archaeological Assessment Document* (December 2004).

Outstanding Universal Value forms part of its significance.”⁶

4.7 Historic England’s *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2*⁷ (hereafter GPA 2) gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.

4.8 In order to do this, GPA 2 also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage’s *Conservation Principles*.⁸ These essentially cover the heritage ‘interests’ given in the glossary of the NPPF⁹ and the online Planning Practice Guidance on the Historic Environment¹⁰ (hereafter ‘PPG’) which are **archaeological, architectural and artistic** and **historic**.

4.9 The PPG provides further information on the interests it identifies:

- **Archaeological interest: “As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or**

⁶ MHCLG, *NPPF*, p. 71.

⁷ Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2nd edition, Swindon, July 2015).

⁸ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

potentially holds, evidence of past human activity worthy of expert investigation at some point.”

- **Architectural and artistic interest: “These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.”**
- **Historic interest: “An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. 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.”¹¹**

4.10 Significance results from a combination of any, some or all of the interests described above.

4.11 The most-recently issued guidance on assessing heritage

⁹ MHCLG, *NPPF*, p. 71.

¹⁰ Ministry of Housing Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹¹ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

significance, Historic England's *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12*,¹² advises using the terminology of the NPPF and PPG, and thus it is that terminology which is used in this Report.

- 4.12 Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

- 4.13 As defined in the NPPF:

"Significance derives not only from a heritage asset's physical presence, but also from its setting."¹³

- 4.14 Setting is defined 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."¹⁴

- 4.15 Therefore, setting can contribute to, affect an appreciation of

significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

- 4.16 How setting might contribute to these values has been assessed within this Report with reference to *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*¹⁵ (henceforth referred to as 'GPA 3'), particularly the checklist given on page 11. This advocates the clear articulation of "what matters and why".¹⁶
- 4.17 In GPA 3, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

¹² Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

¹³ MHCLG, *NPPF*, p. 71.

¹⁴ MHCLG, *NPPF*, p. 71.

¹⁵ Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017).

¹⁶ Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017), p. 8.

4.18 Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

4.19 A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and also that factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement)¹⁷:

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-

20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”

Levels of significance

4.20 Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

4.21 In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- **Designated heritage assets of the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 63 of the NPPF;**

¹⁷ *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, para. 25 and 26.

- **Designated heritage assets of less than the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and**
- **Non-designated heritage assets. Non-designated heritage assets are defined within the PPG as “buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.**¹⁸

4.22 Additionally, it is of course possible that sites, buildings or areas have ***no heritage significance***.

Assessment of harm

4.23 Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

4.24 In order to relate to key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss. It has been**

clarified in a High Court Judgement of 2013 that this would be harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”;¹⁹ and

- **Less than substantial harm. Harm of a lesser level than that defined above.**

4.25 With regards to these two categories, the PPG states:

*“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”*²⁰

4.26 Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle of the spectrum and upper end of the less than substantial harm scale.

4.27 With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated. As such, harm to such assets is articulated as a level of harm to their overall significance, with levels such as negligible, minor, moderate and major harm identified.

4.28 It is also possible that development proposals will cause ***no***

¹⁸ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

¹⁹ *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin), para. 25.

²⁰ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

harm or preserve the significance of heritage assets. A High Court Judgement of 2014 is relevant to this. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, 'preserving' means doing 'no harm'.²¹

4.29 Preservation does not mean no change; it specifically means no harm. GPA 2 states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".²² Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

4.30 As part of this, setting may be a key consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in GPA 3, described above. Again, fundamental to the methodology set out in this document is stating "what matters and why". Of particular relevance is the checklist given on page 13 of GPA 3.

4.31 It should be noted that this key document also states that:

*"Setting is not itself a heritage asset, nor a heritage designation..."*²³

4.32 Hence any impacts are described in terms of how they affect the

²¹ *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin).

²² Historic England, *GPA 2*, p. 9.

significance of a heritage asset, and heritage values that contribute to this significance, through changes to setting.

4.33 With regards to changes in setting, GPA 3 states that:

"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".²⁴

4.34 Additionally, it is also important to note that, as clarified in the Court of Appeal, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused.²⁵

Benefits

4.35 Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

4.36 As detailed further in Section 6, the NPPF (at Paragraphs 195 and 196) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.

²³ Historic England, *GPA 3*, p. 4.

²⁴ Historic England, *GPA 3.*, p. 8.

²⁵ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

4.37 Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 195 and 196.

4.38 The PPG provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 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."²⁶*

²⁶ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

4.39 Any 'heritage benefits' arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the Decision Maker.

5. Planning Policy Framework

5.1 This section of the Report sets out the legislation and planning policy considerations and guidance contained within both national and local planning guidance which specifically relate to the site, with a focus on those policies relating to the protection of the historic environment.

Legislation

5.2 Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*,²⁷ which provides statutory protection for Listed Buildings and Conservation Areas.

5.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

*"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*²⁸

5.4 In the 2014 Court of Appeal judgement in relation to the

Barnwell Manor case, Sullivan LJ held that:

*"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."*²⁹

5.5 A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 draft of the NPPF, the requirements of which are now given in paragraph 196 of the revised NPPF, see below), this is in keeping with the requirements of the 1990 Act.³⁰

5.6 With regards to development within Conservation Areas, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability

²⁷ UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*.

²⁸ *Planning (Listed Buildings and Conservation Areas) Act 1990*, Section 66(1).

²⁹ *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others* [2014] EWCA Civ 137. para. 24.

³⁰ *Jones v Mordue* [2015] EWCA Civ 1243.

of preserving or enhancing the character or appearance of that area.”

- 5.7 Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.
- 5.8 In addition to the statutory obligations set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.³¹

National Planning Policy Guidance

The National Planning Policy Framework (February 2019)

- 5.9 National policy and guidance is set out in the Government’s National Planning Policy Framework (NPPF) published in February 2019. This replaced and updated the previous NPPF 2018 which in turn had amended and superseded the 2012 version. The NPPF needs to be read as a whole and is intended to promote the concept of delivering sustainable development.
- 5.10 The NPPF sets out the Government’s economic, environmental and social planning policies for England. Taken together, these

policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

- 5.11 The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the ‘presumption’) sets out the tone of the Government’s overall stance and operates with and through the other policies of the NPPF. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.
- 5.12 The purpose of the planning system is to contribute to the achievement of sustainable development and the NPPF sets out three ‘objectives’ to facilitate sustainable development: an economic objective, a social objective, and an environmental

³¹ UK Public General Acts, *Planning and Compulsory Purchase Act 2004*, Section 38(6).

objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF. The presumption is set out in full at paragraph 11 of the NPPF and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or*
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*³²*

5.13 However, it is important to note that footnote 6 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in

³² MHCLG, NPPF, para. 11.

*footnote 63); and areas at risk of flooding or coastal change.*³³ (our emphasis)

5.14 The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

5.15 Heritage Assets are defined in the NPPF as:

*"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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*³⁴

5.16 The NPPF goes on to define a Designated Heritage Asset as a:

*"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."*³⁵ (our emphasis)

5.17 As set out above, significance is also defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value

*described within each site's Statement of Outstanding Universal Value forms part of its significance."*³⁶

5.18 Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 190 that:

*"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 asset's conservation and any aspect of the proposal."*³⁷

5.19 Paragraph 192 goes on to state that:

"In determining planning 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*

³³ MHCLG, *NPPF*, para. 11, fn. 6.

³⁴ MHCLG, *NPPF*, p. 67.

³⁵ MHCLG, *NPPF*, p. 66.

³⁶ MHCLG, *NPPF*, p. 71.

³⁷ MHCLG, *NPPF*, para. 190.

- c. *the desirability of new development making a positive contribution to local character and distinctiveness.*³⁸

5.20 With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*³⁹

"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. Substantial harm to or loss of:

- a. *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b. *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*⁴⁰

³⁸ MHCLG, *NPPF*, para. 192.

³⁹ MHCLG, *NPPF*, para. 193.

⁴⁰ MHCLG, *NPPF*, para. 194.

5.21 In the context of the above, it should be noted that paragraph 195 reads as follows:

"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. *the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. *the harm or loss is outweighed by the benefit of bringing the site back into use.*⁴¹

5.22 Paragraph 196 goes on to state:

*"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."*⁴²

⁴¹ MHCLG, *NPPF*, para. 195.

⁴² MHCLG, *NPPF*, para. 196.

5.23 The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 200 that:

*"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, 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."*⁴³

5.24 Paragraph 201 goes on to recognise that *"not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance"*⁴⁴ and with regard to the potential harm from a proposed development states:

*"Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."*⁴⁵ (our emphasis)

5.25 Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of

⁴³ MHCLG, *NPPF*, para. 200.

⁴⁴ MHCLG, *NPPF*, para. 201.

sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

5.26 The then Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

5.27 This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

5.28 The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and 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

⁴⁵ Ibid.

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.”⁴⁶

- 5.29 In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁴⁷ (our emphasis)

⁴⁶ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

Local Planning Policy

- 5.30 Planning applications within Tenterden are currently considered against the policy and guidance set out within the Ashford Local Plan 2030 which was adopted in February 2019.
- 5.31 The Local Plan contains three policies that relate directly to the historic environment, namely Policy ENV13 and ENV14 and HOU5 (e).
- 5.32 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.

Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss.

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

⁴⁷ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

securing the optimum viable use of the heritage asset.

All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance."

5.33 Policy ENV14 'Conservation Areas' goes on to state:

"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.

Proposals should fulfill each of the following:

a) The scale and detailed design of all new development and alterations should respect the historical and architectural character, proportion and massing, including roofscapes, of the area, the relationship between buildings, the spaces between them and with their setting;

b) The materials proposed should be appropriate to the locality and complement those of the existing buildings;

c) Buildings and streets of townscape character, trees, open spaces, walls, fences or any other features should be retained where they contribute positively to the character and appearance of the area;

d) The development should not generate levels of traffic, parking or other environmental problems

which would result in substantial harm to the character, appearance or significance of the area;

e) The use should be appropriate to and compatible with the character, appearance and historic function of the area; and,

f) The development would not prejudice important views into or out of the conservation area."

5.34 Policy HOU5 Residential windfall development in the countryside states:

'Proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable.

Providing that each of the following criteria is met:

.....

e) conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality

6. Setting Assessment

- 6.1 Step 1 of the methodology recommended by the Historic England guidance GPA 3 (see Methodology above) is to identify which heritage assets might be affected by a proposed development.
- 6.2 Development proposals may adversely impact heritage assets where they remove a feature that contributes to the significance of a heritage asset or where they interfere with an element of a heritage asset’s setting that contributes to its significance, such as interrupting a key relationship or a designed view.
- 6.3 Consideration was made as to whether any of the heritage assets present in the vicinity include the site as part of their setting, and therefore may potentially be affected by the proposed development.
- 6.4 From the outset, and based on refused planning application 19/01788/AS (specifically paragraphs 84 to 86 of the Committee Report relating to that application), it should be noted that Ashford Borough Council have considered the Tenterden Conservation Area to be the only heritage asset that is sensitive to the proposed development of the site, with harm only being identified through the removal of a tree which is no longer proposed. Nonetheless, other heritage assets in the vicinity of the site have been considered and taken forward for further setting assessment as appropriate.

Step 1

- 6.5 Assets in the vicinity identified for further assessment on the basis of their proximity, intervisibility, and/or known historic association with the site (i.e. in terms of land ownership and/or functional use) comprise:
 - **St Mildred’s Church and the Tenterden Conservation Area;**
 - **Grade II Listed Stace House (NHLE 1203636), located c. 50m west of the site; and**
 - **Grade II Listed Craythorne (NHLE 1203630), located c. 95m north-west of the site.**
- 6.6 Other assets have been excluded on the basis of a lack of intervisibility or known historic association with the site. This includes Grade II Listed Dovenden (NHLE 1071129), located c. 90m north of the site (Plate 5).



Plate 5 The Grade II Listed Doveden, looking north-west

- 6.7 Based on historic mapping, it appears that Doveden historically possessed south-east-facing views across Woodchurch Road towards a northern parcel of the site; however, any such views have since been foreshortened by intervening modern residential development. For this reason, Doveden has not been taken forward for further setting assessment.
- 6.8 A map of all designated heritage assets in the vicinity of the site is included at Appendix 1.

⁴⁸ Ashford Borough Council, *Conservation Areas*, <https://www.ashford.gov.uk/planning-and-development/building-conservation-and-heritage/conservation-areas/> (accessed 19th March 2021).

APPENDIX 2: MAP OF DESIGNATED HERITAGE ASSETS

Step 2

Asset 1: St Mildred's Church and the Tenterden Conservation Area

- 6.9 St Mildred's Church and the Tenterden Conservation Area are here considered due to their relationship in views from the site.
- 6.10 The current limits of the Tenterden Conservation Area were designated on 10th October 1996. A Conservation Area was first designated in Tenterden in 1974, and the boundaries of this were altered in 1977.
- 6.11 A Conservation Area Assessment for Tenterden was prepared in 1995, following which the Conservation Area was amended to cover the currently designated area. The Assessment was published in 1997; however, this is no longer publicly available and is considered by Ashford Borough Council to be out-of-date.⁴⁸ Consequently, there is currently no adopted Conservation Area Appraisal or Management Plan that informs planning decisions in Tenterden.
- 6.12 The Heritage Strategy adopted by Ashford Borough Council in October 2017 contains a brief summary of the historic development of Tenterden as follows:

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

As a Cinque Port, Tenterden enjoyed virtual self-government, was exempt from national taxation and represented at the coronation of the monarch. By the mid 16th Century however, the waterways of the Romney Marsh silted up and resultant changes in the coastline meant that Tenterden lost all access to the sea, so that today it is some ten miles from the coast although it remains a member of the Cinque Ports. The town continued to prosper however and by the 18th century, access to the rich grazing lands of the marsh and the cultivation of fruit and hops on surrounding higher land continued to bring wealth to the town which became established as an important market and service centre."⁴⁹

- 6.13 The historical development of Tenterden is further described within an Archaeological Assessment of the town undertaken as part of the Kent Historic Towns Survey in 2004.⁵⁰

- 6.14 Tenterden is located at the eastern edge of the Kent High Weald on a plateau of high ground. Ashford is located c. 15km (10 miles) to the north-east; Hastings c. 25km (15 miles) to the south; Maidstone c. 25km to the north; and Royal Tunbridge Wells c. 30km (20 miles) to the north-west.
- 6.15 The Conservation Area boundary covers the historic settlement core of Tenterden along with expansive areas of green space to the south and south-west, which appears to predominantly comprise the grounds of three large residences: Plummer, Heronden and Morghew. Other areas of green space characterise the northern and south-eastern boundaries of the Conservation Area, which comprise agricultural land, and the Recreation Ground and grounds of Hales Place, respectively.
- 6.16 The core of the settlement has a long, linear arrangement, centred on the parish church and the old market place, with vestiges of burgage tenement plots fronting onto the High Street (Plates 6 and 7), below.

⁴⁹ Ashford Borough Council, *Heritage Strategy* (October 2017), p. 21.

⁵⁰ English Heritage and Kent County Council, *Kent Historic Towns Survey: Tenterden Archaeological Assessment Document* (December 2004).



Plate 6 Looking north-east to the High Street and the parish church

- 6.17 Tenterden can be approached from all directions by road. The A28 is the main thoroughfare which passes through the town on a roughly north-east to south-west axis and connects Tenterden to Ashford and Hastings.
- 6.18 There are also multiple approaches by foot, including via public rights of way. The main public right of way is the High Weald Landscape Trail which provides approaches from the south-east and south-west.
- 6.19 There was historically a railway approach to Tenterden via the train station located within the northern boundary of the Conservation Area. This now functions as part of the Kent and

East Sussex Heritage Railway.

- 6.20 There has been no systematic study of key views towards, from or within the Tenterden Conservation Area. Based on an independent survey, it is clear that the most important are the sequential views along the High Street, which include key tableaux of the historic townscape and most of the Listed buildings within the designation area (Plate 6, above, Plate 7, below).



Plate 7 Looking south-west along High Street

- 6.21 Most buildings within the historic core of Tenterden are variably faced in brick, rendered and painted, or clad with hanging tiles, with roofs being overwhelmingly covered in plain clay tiles. There are also important examples of timber frame,

weatherboarded, and stone structures, the most notable of the latter being the parish church of St Mildred (Plate 8).



Plate 8 Looking north-west to the Tower of St Mildred's from High Street

- 6.22 St Mildred's Church, which lies in the historic core of Tenterden, north of the High Street, is a Grade I Listed building and as such is a designated heritage asset of the highest level of significance, as defined by the NPPF.
- 6.23 The church dates to the 14th and 15th. It is mainly constructed

with an exterior of stone rubble and has a crenelated tower of Bethersden marble, with four pinnacles. The interior has a 19th-century wooden vaulted ceiling.

- 6.24 The church lies within a churchyard (Plate 9) which is itself enclosed by built form on three sides, with fields lying to the north.



Plate 9 Looking north-west to the church from the edge of the churchyard

- 6.25 The most important views to the Church of St Mildreds are those possible from the churchyard and immediate vicinity, and wider historic core of Tenterden (Plates 6, 8 and 9, above).
- 6.26 Many views of St Mildreds are possible from the wider vicinity, beyond the settlement.
- 6.27 Key wider views are from footpaths to the north of the Church, from where the architectural detail of the tower can be appreciated, and the asset can be seen in conjunction with the historic core of the town, the station and nearby agricultural land (Plate 10).



Plate 10 Looking south-east towards St Mildreds from footpath AB16

- 6.28 Also, in views south and south-east from footpaths AB16, AB17

and AB18, the topographic situation of the church and historic core can be appreciated (Plates 11 to 13).



Plate 11 Looking south-east towards St Mildreds church from further north on footpath AB16



Plate 12 Looking south-east to the Church of St Mildred from the footpath AB17



Plate 13 Looking south-east to the Church of St Mildred from the footpath AB18

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

Statement of significance

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

- **The long, linear arrangement of the town core, which is of historic interest in illustrating the**

medieval layout of the settlement;

- **The numerous Listed buildings located within the designation boundary which contribute to the historic, archaeological, architectural and artistic interest of the Conservation Area, as well as possessing intrinsic heritage significance;**
- **The use of vernacular buildings materials and techniques, including brickwork, timber-framing, weatherboarding, and tiling, which contribute to the historic, architectural and artistic interest of the Conservation Area;**
- **Recorded archaeological remains and deposits within the designation area, which principally illustrate the medieval and post-medieval development of the Conservation Area and contribute to its archaeological and historic interest;⁵¹ and**
- **Key areas of green space within the Conservation Area, which include parcels of agricultural land, parkland, domestic grounds and gardens, and modern recreational facilities.**

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

6.32 There is no statutory protection for the settings of Conservation Areas, and it is clear that elements of the surrounds, or 'setting',

of the Tenterden Conservation Area have been included within the designation boundary, such as the parkland and domestic grounds to the west and south-west, and agricultural land to the north.

6.33 The wider elements of the rural landscape across which there are views to the historic core of the Conservation Area, which illustrate its historic topographic context, can be considered to make a contribution to the heritage significance of the asset through setting. Views from the wider area to the Church of St Mildred are discussed below.

6.34 With regards to the Church of St Mildred, the heritage significance of the church is largely embodied in its physical form, but setting does make a lesser contribution to its significance. The elements of its setting that make the greatest contribution to its significance are the historic town it served and its churchyard, with which it had and has a functional relationship. These are also the areas from where the best views of the asset are possible, from where the architectural and artistic significance of the asset can be best appreciated and understood.

6.35 Some wider views to the church make a smaller contribution to significance through setting. These include views from footpath AB16 to the north of the church from where the architectural detail of the church and its location within the historic core of

⁵¹ See English Heritage and Kent County Council, *Kent Historic Towns Survey: Tenterden Archaeological Assessment Document*.

the settlement can be appreciated (Plate 10, above), and views from footpaths AB16, AB17 and AB18 from where the topographic situation of the church can be understood.

- 6.36 Other views to the church from the wider area make no particular contribution to the heritage significance of the asset, but rather are among the large number of views to the asset from the wider vicinity.

Any contribution of the site

- 6.37 A c. 25m section of highway and verge along Appledore Road at the westernmost edge of the site (where the new pedestrian, cycle and emergency access to the site is proposed) lies within the Conservation Area. This contains a mature horse chestnut tree. This tree, which will be retained in the proposed scheme, positively contributes to the character and appearance of the Conservation Area.
- 6.38 The potential contribution of the site to the heritage significance of the Conservation Area and church via setting is considered below.
- 6.39 The site is undeveloped agricultural land with historic mapping suggesting that its general character has changed little since the 19th century, although there has been some minor boundary loss and the field boundaries are no longer maintained as functional boundaries, now being permeable bands of linear vegetation (Plate 14).



Plate 14 Gappy former hedge line within the site

6.40 When approaching the Conservation Area via Woodchurch Road and Appledore Road, the full extent of the site and its agricultural character are not visible or appreciable due to the modern residential development on the north side of Appledore Road and the south side of Woodchurch Road, and the mature trees, hedgerows, and other vegetation that characterise the edges of the site. There are some glimpses of small parts of the site from Appledore Road (Plates 15 and 16), but these are seen in seen in the context of modern housing.



Plate 15 Glimpse of the site between houses from Appledore Road (taken from beyond the Conservation Area)



Plate 16 Glimpse into the site from Appledore Road (taken on the edge of the Conservation Area)

- 6.41 Appledore Road and Woodchurch Road are B-roads which do not constitute primary approaches to the Conservation Area. As gateways to the asset, they have overwhelmingly modern, leafy, residential characters, and make no particular contribution to the understanding or appreciation of Tenterden's historic townscape or rural context. Additional residential development has recently taken place on land to the south of Appledore Road, opposite the proposed entrance to the application site.
- 6.42 At the edge of the Conservation Area on Appledore Road, the soft verge that lies within both the Conservation Area and the site possesses a mature tree. This tree is part of an avenue of

trees which partially survives along Appledore Road, straddling the edge of the Conservation Area.

- 6.43 Immediately behind tree, within the site but outside the Conservation Area, is a low hedge and gravelled trackway, and further trees and vegetation which screen views into the main body of the site.



Plate 17 The tree within the site that lies within the Conservation Area

- 6.44 There are distant views to the Church of St Mildred from within the site, mostly from the high ground followed by the public footpath.



Plate 18 Looking south-west from within the site to the tower of the Church of St Mildred



Plate 19 Looking west-south-west across the site to the tower of St Mildreds

- 6.45 The views comprise a foreground of fields, albeit the boundaries are now gappy and permeable. Beyond this is the edge of Tenterden, with the visible buildings on this edge being of modern origin. Above this line of modern built form, and above more intervening vegetation within the Conservation Area, the church tower is visible.
- 6.46 These views do not allow an appreciation of the architectural detail of the tower, nor the situation of the church within the historic core of Tenterden, nor its topographic situation.
- 6.47 As such, the site is not considered to make any specific contribution to the heritage significance of the Church and

Conservation Area above facilitating distant views from this general area.

6.48 The peripheral glimpses of the westernmost part of the site that are possible in views along approaches to the Conservation Area

between modern residences are not considered to contribute to the heritage significance of the asset through setting.

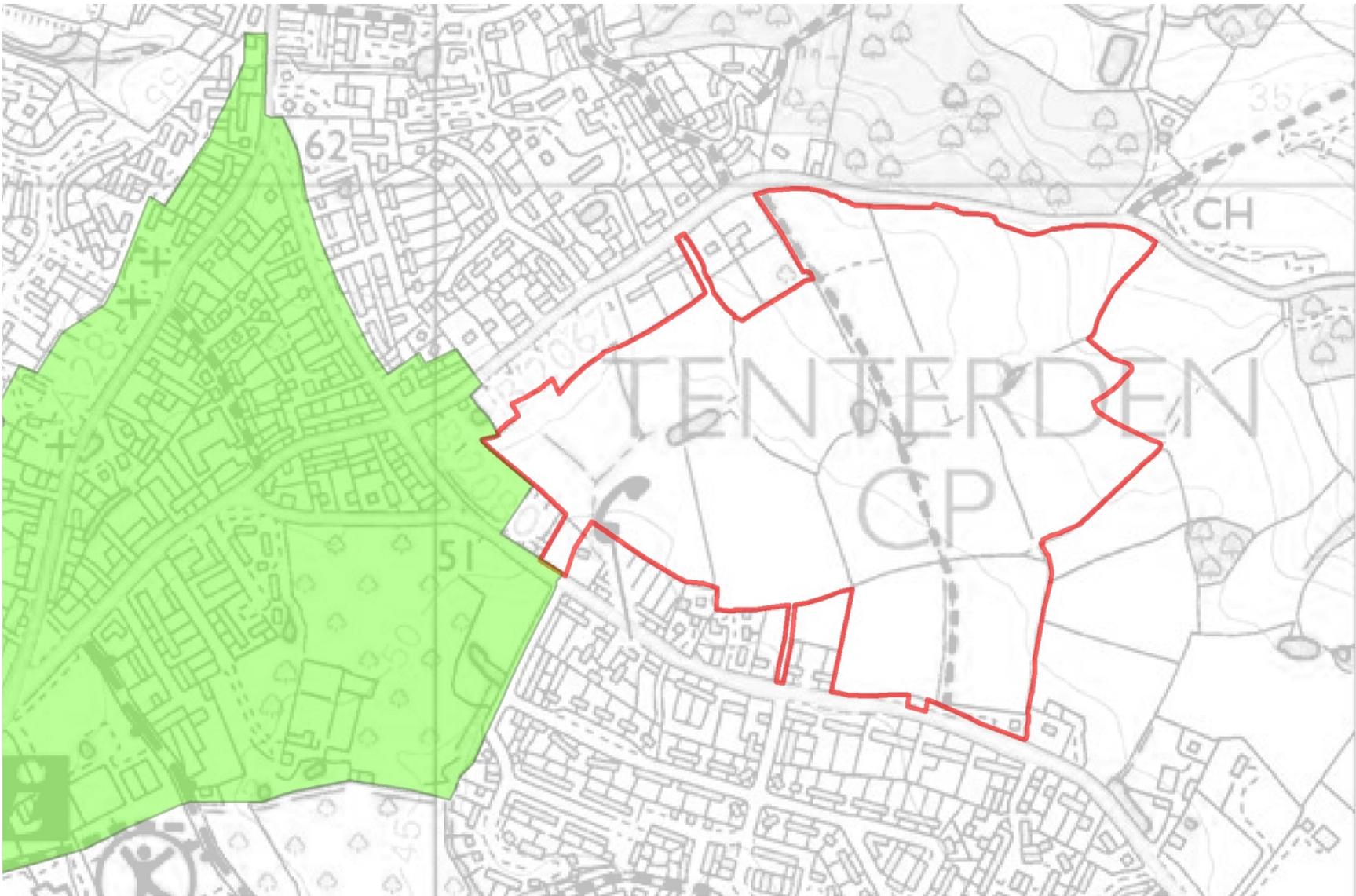


Plate 20: Map showing the site (outlined in red) in relation to the Tenterden Conservation Area (shaded green and only partially visible).

Impact assessment

- 6.49 The mature horse chestnut tree within the part of the site that lies within the Conservation Area and positively contributes to its character and appearance will be retained.
- 6.50 Minor traffic calming measures are proposed on Appledore Road, including a street narrowing feature within the Conservation Area. This has been sensitively designed, simply forming an extension of the grassed verge with the requisite signage, and is in keeping with the character and appearance of the Conservation Area.
- 6.51 Hence, the character and appearance of the Conservation Area will be preserved.
- 6.52 Consideration of the views to St Mildred's Church has been a key consideration in the design of the proposed masterplan. Three view corridors have been created to frame views of the church from the higher ground crossed by the public footpath (See DAS *Section 3.10 – Key View Photomontages*, and the LVIA, Viewpoint 5, Viewpoint 9 and Viewpoint B).
- 6.53 In these views, the tower of the church will still be visible above the line of vegetation within the Conservation Area, maintaining views to the asset from this general area.
- 6.54 The change within the views and the blocking of some other views from the high ground will cause no harm to the heritage significance of the Church or the Conservation Area, as they make no particular contribution to the heritage significance of

the assets, being distant views to the church from this general area which are not illustrative of its architectural detail, its topographic situation on a local high point, or its location within the historic settlement core.

- 6.55 The change of character of the site may also be glimpsed from Appledore Road on the approach to the Conservation Area and on its edge. These changes on the approach to the Conservation Area that is flanked by modern housing would cause no harm to the heritage significance of the asset through setting.
- 6.56 In summary, the proposed development would preserve the character and appearance of the land within the Conservation Area, and cause no harm to the heritage significance of the church of St Mildred and the Tenterden Conservation Area through changes in setting.

Asset 2: Stace House

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

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

- 6.58 The house is located on the south side of Woodchurch Road, at the junction with Beacon Oak Road. The principal western elevation of the house faces Beacon Oak Road but is separated

from the highway by a gravelled forecourt and small garden area to the south. There appears to be a small, single-storey, detached garage south-west of the house. Further ancillary buildings are located to the east of the house. Of these, the north-easternmost outbuilding appears to have been alienated from Stace House and converted to residential use. The modern curtilage boundary of the Listed building is defined by brick walls, closeboard timber fencing, and vegetation.



Plate 21 Looking south-east to Stace House

6.59 The house appears to be shown on John Adams' map of 1822 but is most clearly recorded on the 1843 tithe map and apportionment. The tithe records a house, garden and pleasure

grounds, labelled 'Eastgate', that were owned and occupied by Elizabeth Manclarke. There was a large residence known as 'Crathorne' on the opposite side of the road to the north (still extant).

6.60 Subsequently, the house was known as 'The Limes' and is labelled as such on the First Edition (1870) Ordnance Survey map. This map better reveals the layout of the associated gardens, which appears to have included a tree-lined walk to the south of the house and its immediate gardens and a pond to the east.

6.61 In more recent years, the curtilage of Stace House has been truncated and modern residential development has taken place in its immediate surrounds.

6.62 The junction location of the Listed building means it can be approached from the north and south via Beacon Oak Road, from the east via Woodchurch Road, and from the west via Golden Square.

6.63 The principal western elevation is best viewed and appreciated from the private forecourt. This same elevation can only be glimpsed from public areas i.e. the road junction to the west. There are also glimpsed views of the northern and eastern elevations from Woodchurch Road. The remainder of the Listed building will be best appreciated from its private garden.

6.64 The primary views out from the Listed building are from its principal elevation, across the forecourt and Beacon Oak Road to the west, and from the southern elevation, across the private

garden.

6.65 The site is very largely screened from Stace house by intervening vegetation, with only a glimpse of its corner visible.



Plate 22 View to Stace House from the eastern area of the site



Plate 23 View to Stace House from the very easternmost corner of the site

6.66 Only from the very easternmost corner of the site is slightly more of the corner of the house visible (Plate 20, above), but this intervisibility is still minimal.

Statement of significance

6.67 The Grade II Listing of the Stace House highlights that it is a heritage asset of less than the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of the Tenterden Conservation Area.

6.68 The heritage significance of the Listed Building is principally embodied in its physical fabric. It possesses historic interest as a good example of an 18th-century, Queen Anne style dwelling, prominently located at a crossroads. The internal form and layout of the building is unknown; however, any surviving elements that illustrate the past use and circulation of the house will further contribute to this historic interest.

6.69 The architectural and artistic interest of the house is derived from its 18th-century brickwork, hipped roof, and high-quality architectural details, which include a pedimented front doorway with pilasters, fanlight, and four-panel door. There is potential for internal architectural and decorative features which will further contribute to this architectural and artistic interest.

6.70 The historic core of the house is clearly legible and appears to be largely intact, and there is no known evidence of this building replacing an earlier dwelling or occupied site. Therefore, the archaeological interest of the building appears to be limited.

6.71 The setting of Stace House also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:

- **The forecourt, from which the historic and architectural interest of the principal western elevation of the house can be best appreciated;**
- **The private garden area, which contributes to the historic interest of the property by illustrating its domestic curtilage;**
- **Its surviving ancillary buildings, including the outbuilding to the north-east which appears to be in separate ownership and has been converted to residential use;**
- **The earliest surviving elements of the brick boundary wall, which demarcate the historic curtilage and may be curtilage listed;**
- **The adjacent road junction, which forms the main approach to the house (currently and historically) and from which there are public glimpses of the Listed building's principal elevation; and**
- **Grade II Listed Craythorne, situated to the north on the opposite side of Woodchurch Road, which is near-contemporary with Stace House and is a long-standing element of its immediate surrounds.**

6.72 Other elements of the historic surrounds of the Stace House

building have been lost, or else their historic association with the Listed building has been severed and is no longer legible, such as the fields to the east and south-east (the site).

Any contribution of the site through setting

- 6.73 The 1843 tithe map records that Stace House and most of the site were in the shared ownership and occupation of Elizabeth Manclarke (Plate 21). The site therefore formed the wider working agricultural estate that belonged to the house at that time.
- 6.74 This agricultural land has since been alienated from the Listed building and physically separated by intervening modern

dwellings and their gardens, as well as a dense cluster of trees at the western corner of the site. The site is no longer legible as part of the historic wider agricultural estate of Stace House and it does not illustrate the domestic function of the Listed building.

- 6.75 The orientation of the Listed building is such that there are no designed views towards the site. The intervening modern residential plots and the trees at the western corner of the site largely screen incidental views of the site from the Listed building and its curtilage.
- 6.76 The site makes no contribution to the heritage significance of Grade II Listed Stace House through setting.



Plate 24: Extract of the 1843 tithe map for the parish of Tenterden showing those parcels within the application site (shaded blue) which historically belonged to Stace House (location outlined in blue).

Source: *The Genealogist*.

Impact assessment

- 6.77 Whilst the site is not considered to contribute to the heritage significance of Stace House through setting, a set back of built form has been included in the masterplan to ensure development does not overshadow the structure or its curtilage.
- 6.78 No harm to the heritage significance of the asset through setting is anticipated.

Asset 2: Craythorne

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

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

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



Plate 25 Looking north-west to Craythorne from Woodchurch Road

- 6.81 Historic mapping indicates that the grounds of Craythorne were once more extensive and included a formal garden and pond to the east and orchards to the north. These grounds have since been truncated by modern residential development to the north and east.
- 6.82 Historically the main approach to Craythorne was via a pathway off Woodchurch Road which led directly to the principal southern elevation of the house. This pathway is no longer extant. Today, the house is approached via a secondary pathway and modern driveway off Beacon Oak Road.
- 6.83 There are views of the principal southern elevation of Craythorne

from Woodchurch Road, although partially screened by intervening boundary vegetation. This elevation is best appreciated from the private front garden and road. From Beacon Oak Road there are views of the secondary western façade.

- 6.84 The principal southern elevation of Craythorne possesses three pairs of bay windows, aligned vertically across all three floors. This is indicative of designed, south-facing views across Woodchurch Road. Historically, it appears that the dwelling, ancillary buildings, and gardens of Stace House would have formed the main content of these views, while the upper windows of Craythorne would have overlooked Stace House towards the grounds and parkland of Hales Place further to the south. In addition to this, there were probably peripheral views of Golden Square to the south-west and the agricultural land to the south-east (including the site).
- 6.85 The content of these designed, south-facing views has since changed, principally as a result of modern residential development along Woodchurch Road and Beacon Oak Road.
- 6.86 From the windows of the secondary, western façade of Craythorne, there are views across Beacon Oak Road to residential development beyond.

Statement of significance

- 6.87 The Grade II Listing of Craythorne highlights that it is a heritage asset of less than the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of the Tenterden Conservation Area.
- 6.88 The heritage significance of the Listed Building is principally embodied in its physical fabric. It possesses historic interest as a good example of a late 18th-century dwelling, prominently located at a crossroads. The internal form and layout of the building is unknown; however, any surviving elements that illustrate the past use and circulation of the house will further contribute to this historic interest.
- 6.89 The architectural and artistic interest of the house is principally derived from its principal southern façade, which is stuccoed to emulate masonry and possesses high-quality architectural details including a pedimented doorway and window, bay windows, and a corbel table. There is potential for internal architectural and decorative features which will further contribute to this architectural and artistic interest.
- 6.90 The Listed building appears to be of limited archaeological interest. Its historic core is clearly legible and largely intact, and there are no known antecedent structures or earlier occupation of the plot.
- 6.91 The setting of Craythorne also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of

the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:

- **The private garden area, which contributes to the historic interest of the property by illustrating its domestic curtilage as well as facilitating key views of the building;**
- **The low brick boundary wall, which demarcates the historic curtilage of the house;**
- **The adjacent road junction, which forms the main approach to the house (currently and historically) and from which there are public glimpses of the Listed building's principal elevation;**
- **Grade II Listed Stace House, situated to the south on the opposite side of Woodchurch Road, which appears to slightly pre-date Craythorne and forms the foreground content of designed views out from the principal elevation of Craythorne; and**
- **The grounds and parkland of Hales Place further to the south, which appear to have been other components of the intended content of designed views out from the principal elevation of Craythorne.**

Any contribution of the site through setting

6.92 The 1843 tithe map indicates that Craythorne and the site were in separate ownership and occupation. There is no evidence of a historic association in terms of landownership or functional use.

6.93 The elevated position of Craythorne and the bay windows of its principal southern elevation make it likely that there were peripheral views of the site historically, although the site was evidently not the focal point of these designed views.

6.94 As noted above, the content of these views has changed considerably since Craythorne was built. Modern residential development along the south side of Woodchurch Road now intervenes between the site and the Listed building. There also appears to be greater intervening tree cover between the Listed building and the site today than there was historically, thus further curtailing peripheral views of the site.

6.95 Glimpses of the upper elements of Craythorne are possible from within the site, with views to these elements partially screened by vegetation in winter, and anticipated to be almost entirely screened in the summer (Plate 23).



Plate 26 Glimpsed and filtered view of the upper elements of Craythorne from within the site

is anticipated.

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

Impact assessment

- 6.97 No harm to the heritage significance of the asset through setting

7. Conclusions

- 7.1 Heritage has been a key consideration in the design of the proposed scheme.
- 7.2 The mature horse chestnut tree within the part of the site that lies within the Conservation Area and positively contributes to its character and appearance will be retained. Hence, the character and appearance of the Conservation Area will be preserved.
- 7.3 Consideration of the views to St Mildred’s Church has been a key consideration in the design of the proposed masterplan. Three view corridors have been created to frame views of the church from the higher ground crossed by public footpath AB12 (See *DAS Section 3.10 – Key View Photomontages*, and the LVIA, Viewpoint 5, Viewpoint 9 and Viewpoint B).
- 7.4 In these views, the tower of the church will still be visible above the line of vegetation within the Conservation Area, maintaining views to the asset from this general area.
- 7.5 The change within the views and the blocking of some other views from the high ground will cause no harm to the heritage significance of the Church or the Conservation Area, as they make no particular contribution to the heritage significance of the assets, being distant views to the church from this general area which are not illustrative of its architectural detail, its topographic situation on a local high point, or its location within the historic settlement core.
- 7.6 The change of character of the site may also be glimpsed from Appledore Road on the approach to the Conservation Area and on its edge. These changes on the approach to the Conservation Area that is flanked by modern housing would cause no harm to the heritage significance of the asset through setting.
- 7.7 In summary, the proposed development would preserve the character and appearance of the land within the Conservation Area, and cause no harm to the heritage significance of the church of St Mildred and the Tenterden Conservation Area through changes in setting.
- 7.8 Furthermore, no harm is anticipated to any other designated heritage assets.
- 7.9 With regards to policies ENV13 and ENV14 of the ABLP (2019), the proposals are not in conflict with ENV13 as no harm will occur, nor ENV14, as the tree within the Conservation Area will be retained. With regards to HOU5, the development complies with criterion (e).

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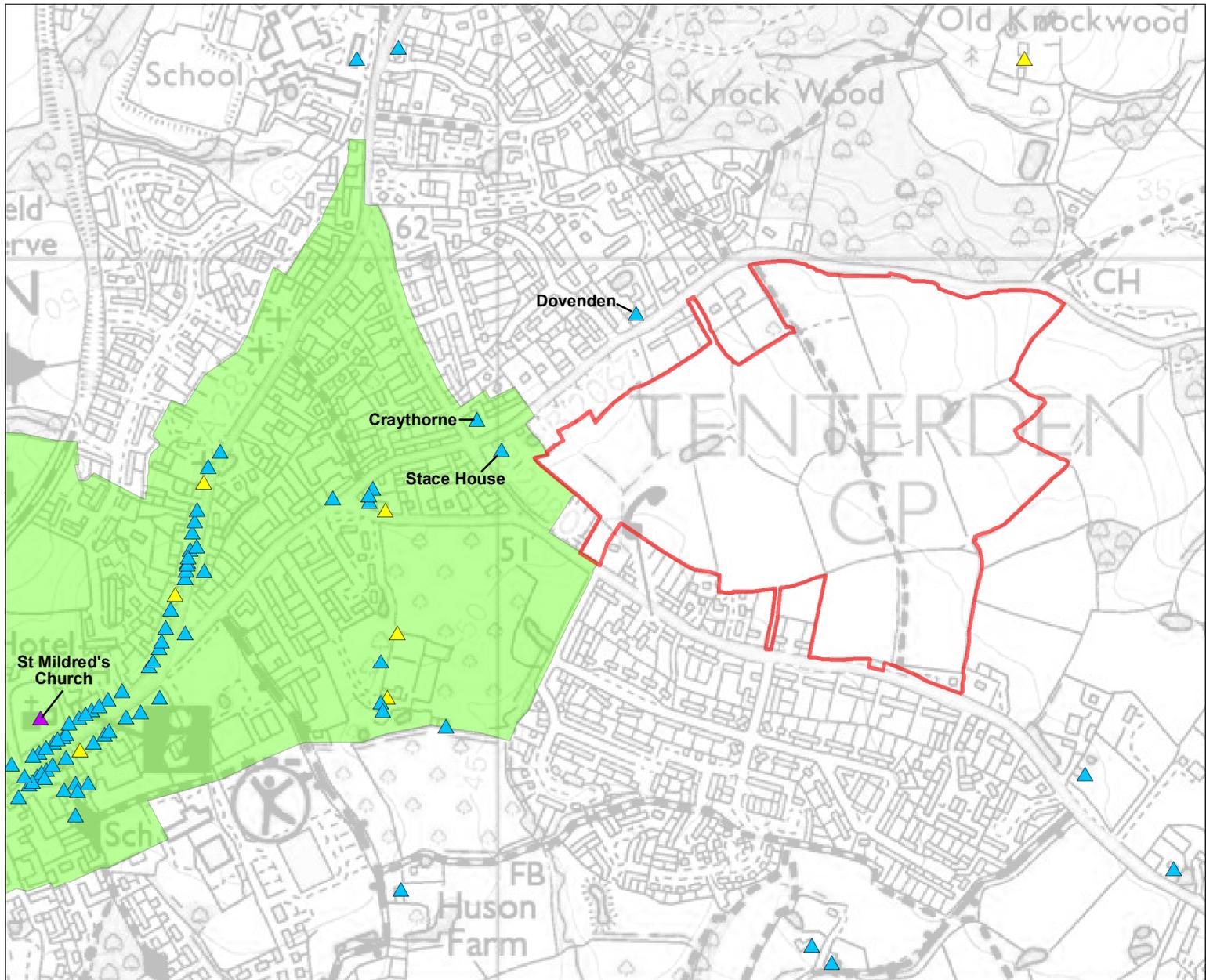
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Appendix 1: Map of Designated Heritage Assets



- KEY**
- Site
 - Tenterden Conservation Area
- Listed Buildings**
- ▲ Grade I
 - ▲ Grade II*
 - ▲ Grade II

Appendix 1: Map of Designated Heritage Assets

Land at Appledore Road, Tenterden, Kent

Client: Wates Developments Ltd
 DRWG No: P21-0651 Sheet No: - REV:-
 Drawn by: JT Approved by: GS
 Date: 24/03/2021
 Scale: 1:8,154 @A4



DESIGN



ENVIRONMENT



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