

Heritage Statement

**LAND ADJOINING 2 GREEN FARM
COTTAGES GREEN FARM LANE
SHORNE DA12 3HT**

**Change of use of land to keeping the
keeping of horses and erection of Stables
and a Sand-School**



By: GRAHAM SIMPKIN PLANNING

For: Mr Stuart Fisher

Project reference: PR4586

12 February 2026

office@gsplanning.uk



Contents

1	Introduction	3
2	Planning Policy Framework	3
3	Other Material Considerations.....	4
4	Methodology	6

Assessment

5	What Heritage Assets are potentially affected?.....	8
6	What is the significance of the Heritage Assets?.....	16
7	What is the impact on significance?.....	18
8	How have proposals been designed to preserve significance?.....	20
9	Conclusions.....	21

1. INTRODUCTION

The purpose of the Heritage Statement is for the identification of the heritage assets(s) that have the potential to be affected by the proposals and their setting to enable an assessment of how the development proposals might affect the significance of these asset(s).

2. PLANNING POLICY FRAMEWORK

- 2.1** This section of this statement sets out the legislation and planning policy considerations and guidance at both the local and national level, which specifically relate to the application site, with a focus on those policies relating to the protection of the historic environment.

Legislation

- 2.2** Legislation relating to the Built Historic Environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides statutory protection for Listed Buildings and Conservation Areas.

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

"In considering whether to grant planning permission for 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 of special architectural or historic interest which it possesses".

- 2.4** 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."

- 2.5** A Court of Appeal judgment ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134, see below), this is in keeping with the requirements of the 1990 Act.

- 2.6** Notwithstanding the statutory presumption set out within the Planning (Listed Buildings and Conservation Area) Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are indicate otherwise.

Development Plan

2.7 In terms of the Development Plan for Gravesham Borough Council (GBC), this comprises of the following documents that are relevant to this application:

- Adopted Core Strategy (CS) (2014);
- Gravesham Local Plan First Review (Saved Policies) 1994

In the CS, the following heritage related policies are considered relevant:

- CS01: Sustainable Development
- CS19 Development and Design Principles
- CS20 Heritage and the Historic Environment

In the Local Plan First Review 1994, the following heritage related policies are considered relevant:

- TC2 Policy for Listed Buildings

3 OTHER MATERIAL CONSIDERATIONS

The NPPF 2024 (The Framework) as amended February 2025

3.1 Section 16 of the Framework sets out policy guidance in respect to conserving and enhancing the historic environment. In determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (paragraph 207).

3.2 Paragraph 210 of the Framework sets out that in determining applications, LPAs should take into account:

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

3.3 Proposals that preserve elements that make a positive contribution to or better reveal the significance of heritage assets should be treated favourably (paragraph 219).

3.4 Paragraph 214 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

3.5 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 securing its optimum viable use (paragraph 215).

3.6 The effect of development on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 216).

3.7 LPAs are advised to take a positive approach to decision taking, looking for solutions rather than problems, and should seek to approve applications for sustainable development. LPAs should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area (paragraph 39).

3.8 In addition to the Framework, sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to have special regard to the desirability of preserving a listed building and conservation area, their setting or any features of special architectural or historic interest which they may possess.

National Planning Practice Guidance (NPPG)

3.9 The NPPG elaborates upon the Framework and was initially introduced in 2014. It has been updated to reflect the subsequent updated versions of the Framework. The following sections of NPPG are relevant to this proposal.

3.10 NPPG expands on the issue of the conservation of heritage assets. Conservation is an active process of managing change, requiring a flexible and thoughtful approach to get the best out of heritage assets. Part of the public value of heritage assets is the contribution that they can make to our understanding and interpretation of our past. Consequently, where complete or partial loss of an asset is justified, the aim would be to capture and record the evidence of the significance which is to be lost, to interpret its contribution to the understanding of our past and to make that information publicly available (paragraph ID 18a-002-20190723).

- 3.11** NPPG advises that 'significance' (as defined in the glossary of the Framework) is important in decision taking. An assessment must be made in respect of the nature, extent and importance of the significance of the heritage asset, and the contribution of its setting in understanding the potential impact and acceptability of development proposals (paragraph ID 18a-007-20190723). Setting of a heritage asset is defined in the glossary of the Framework as follows: "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."
- 3.12** In order to assess the significance of a heritage asset it is important to consider both the heritage asset's physical presence as well as its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker. Substantial harm is a high test, so it may not arise in many cases. 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 (paragraph ID: 18a-018-20190723).
- 3.13** In order to avoid or minimise the harm to the significance of a heritage asset a clear understanding of that significance and its setting is necessary (paragraph ID: 18a-008-20190723).
- 3.14** As per the Framework in paragraph 208, public benefits should be used to justify the proposal where it is likely to lead to less than substantial harm to the significance of a heritage asset. The NPPG advises that 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 should 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. Public benefits may include heritage benefits, such as: (i) sustaining or enhancing the significance of a heritage asset and the contribution of its setting; (ii) reducing or removing risks to a heritage asset; (iii) securing the optimum viable use of a heritage asset in support of its long term conservation (paragraph ID: 18a-020-20190723).

4 METHODOLOGY

- 4.1** In determining applications, paragraph 194 of the NPPF requires applicants to describe the significance of any heritage assets affected by development proposals. The level of detail should be proportionate to an assets' importance and no more than is sufficient to understand the potential impact of any alteration on its significance.
- 4.2** Historic England's Good Practice Advice in Planning provides information on good practice to assist in implementing historic environment policy in the Framework and the NPPG. The second edition of advice note 3 ('The Setting of Heritage Assets') was published in December 2017. The importance of the setting lies "in what it contributes to the significance of the heritage asset or to the ability

to appreciate that significance." Paragraph 9 then sets out a number of considerations that assist in understanding setting and significance. These include:

- (a) Change over time;
- (b) Cumulative change;
- (c) Access and setting;
- (d) Buried assets and setting;
- (e) Designed settings;
- (f) Setting and urban design;
- (g) Setting and economic viability.

4.3 In accordance with the levels of significance articulated in the Framework, four levels of significance are identified:

1. Designated heritage assets of the highest significance, as per paragraph 194(b) of the Framework, 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;
2. Designated heritage assets of less than the highest significance, as identified in paragraph 194(a) of the Framework, which includes grade II listed buildings, or grade II registered parks or gardens;
3. Non-designated heritage assets, as defined within the PPG including "buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets."
4. No heritage significance, covering the sites, buildings or areas that do not fall within any of the other levels.

4.4 In respect of levels of harm, the following may be identified:

1. **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', and;
2. **Less than substantial harm.** Harm of a lesser level than that defined above;
3. **No harm or preserve the significance of heritage assets.** A High Court judgment in 2014 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', which permits change. What matters is whether that change is neutral, harmful or beneficial to the significance of an asset.

4.5 Part 2 of the note sets out a methodology for a proportionate approach to decision taking with respect to the contribution made by setting to significance, with paragraph 19 noting: "Amongst the Government's planning objectives for the historic environment is that conservation decisions are based on proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- 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
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- Step 4: explore ways to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes."

ASSESSMENT

Site name Land adjoining 2 Green Farm Cottages

Address of site Green Farm Green Lane Shorne DA12 3HT

Grid Reference TQ 69690 72496

Schedule of Works

Change of use of land to keeping of horses and erection of stables and sand-school

5.1 What heritage asset(s), including their setting, are potentially affected by the proposals?

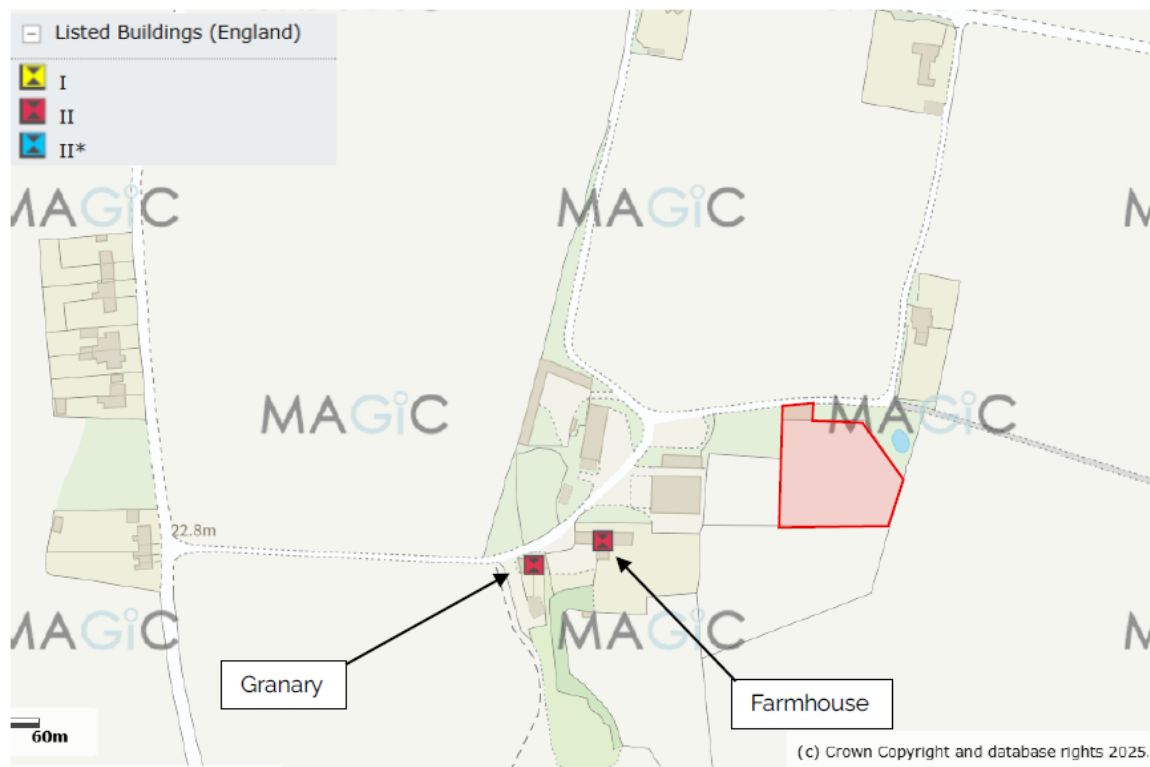
1. Scheduled Monument (SM)	☐
2. Listed Building (LB)	☒
3. Conservation Area (CA)	☐
4. Registered Park and Garden (RPG)	☐
5. Historic Battlefield (HB)	☐
6. Locally Listed Heritage Asset (LLHA)	☐

7. Archaeological Notification Area (ANA)	☐
8 Other Non-Designated Heritage Asset (including below ground archaeology)	☐

5.2 What is known about the affected heritage asset(s)?

5.3 (a). Summary of the history of the site.

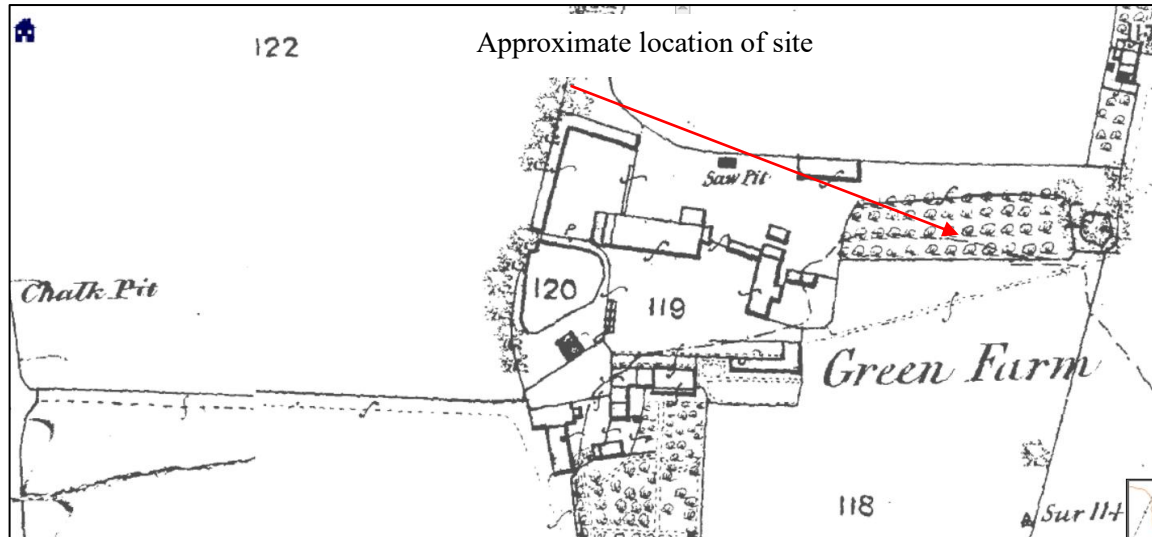
5.3.1 The application site is located in open countryside to the east of Green Farm Lane and south of Lower Road. The site is within the Metropolitan Green Belt. There are nearby Grade II listed buildings at Green Farm Farmhouse and The Granary. These are indicated on the map below. The approximate extent of the application site is also indicated.



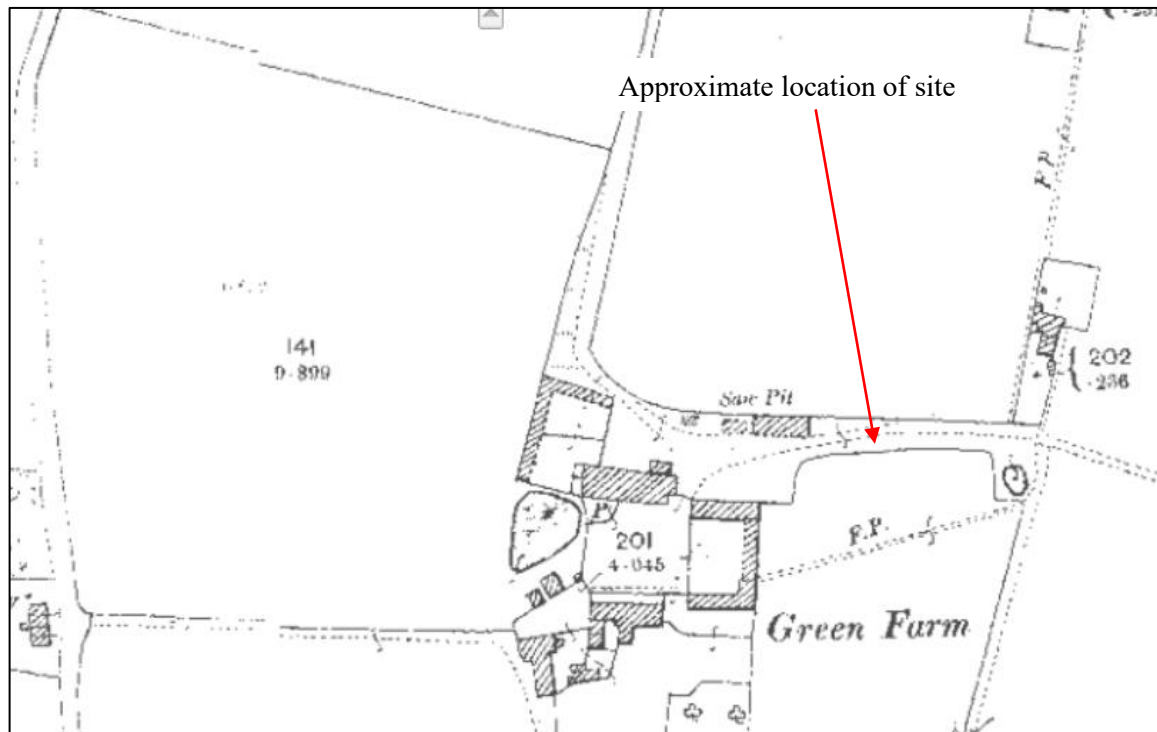
DEFRA Magic Map

5.3.2 Historic Maps (taken from KLIS) show the following progression of development.

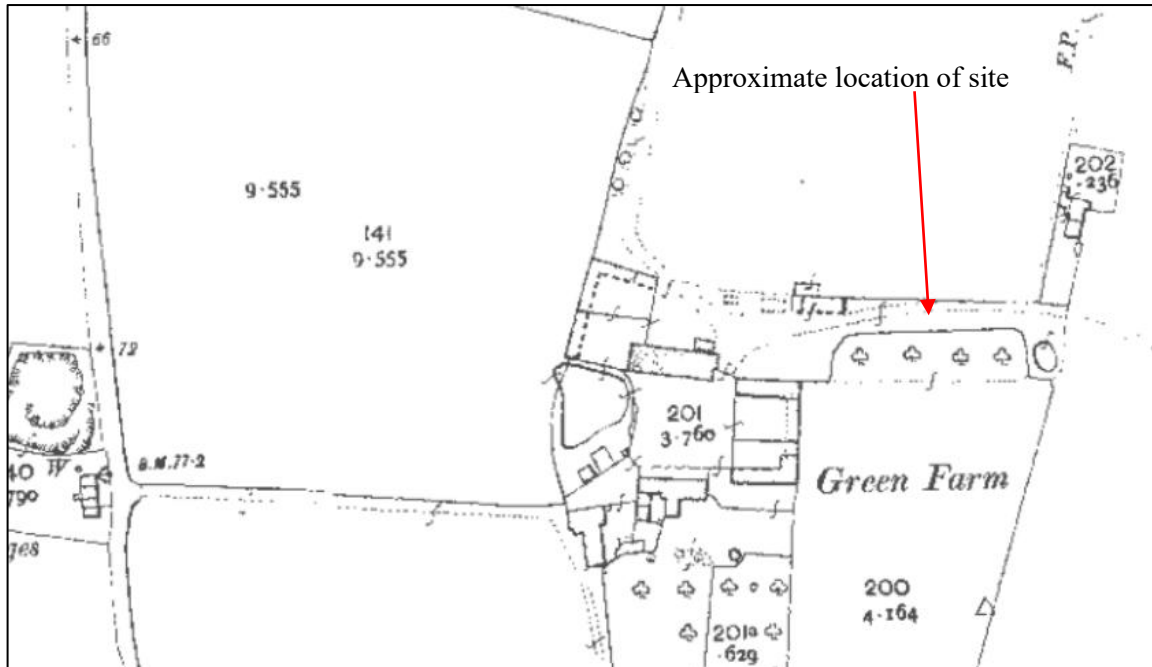
1871-1890



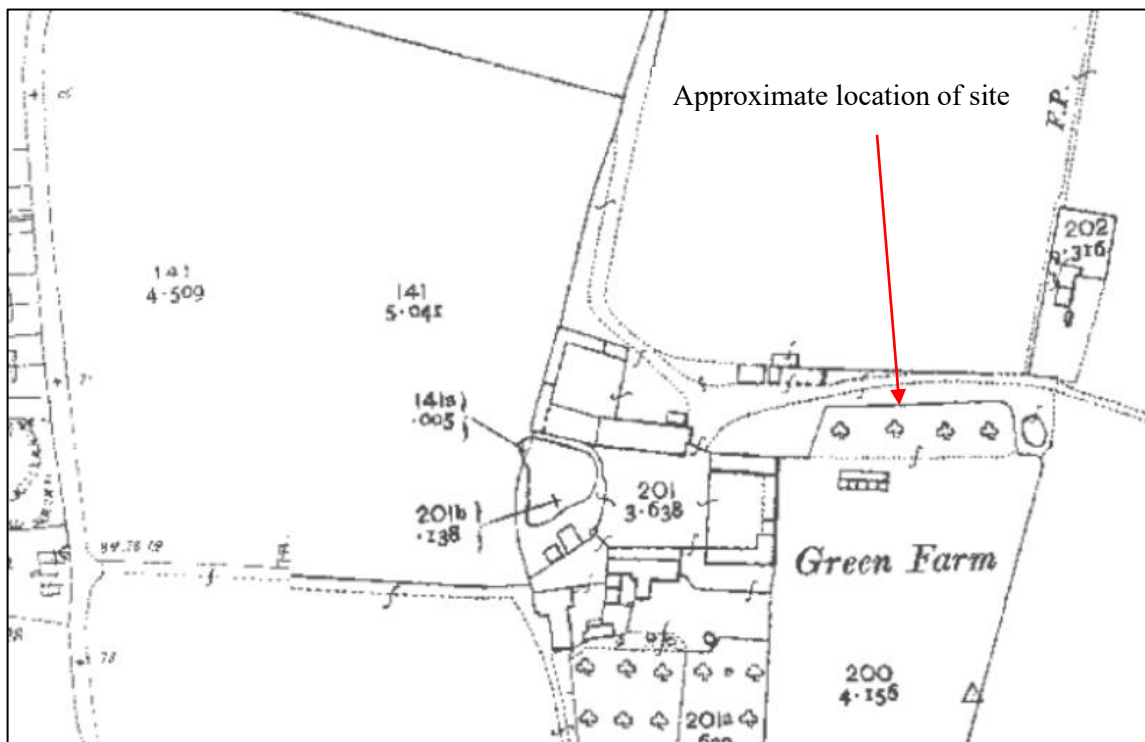
1897 -1900



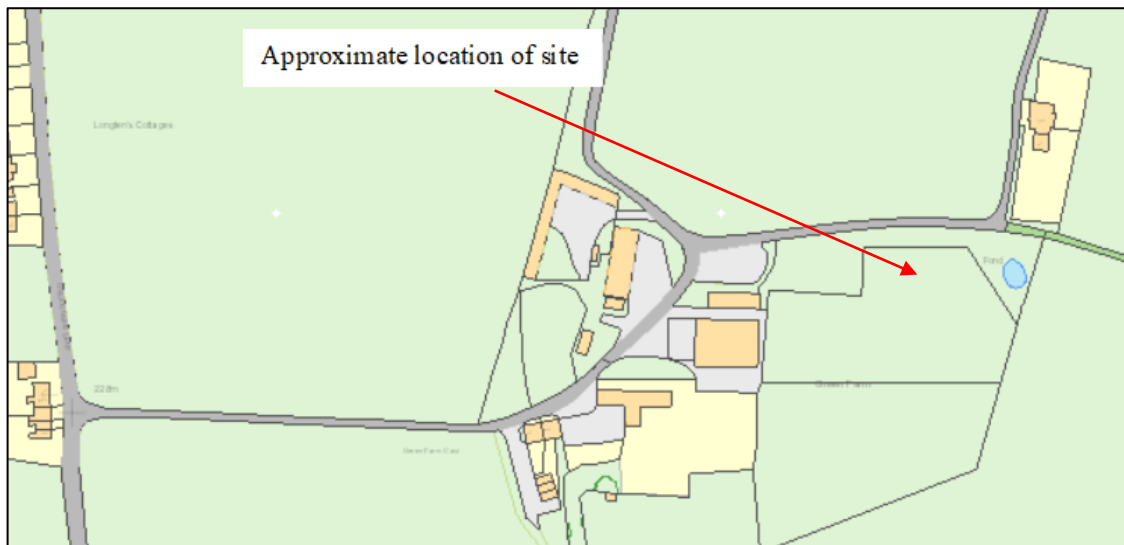
1907 -1923



1929-1952



Current



5.3.3 Google Earth Pro images from 1940 towards the present day also indicate the development of the site.

1940



1960



1990



2003



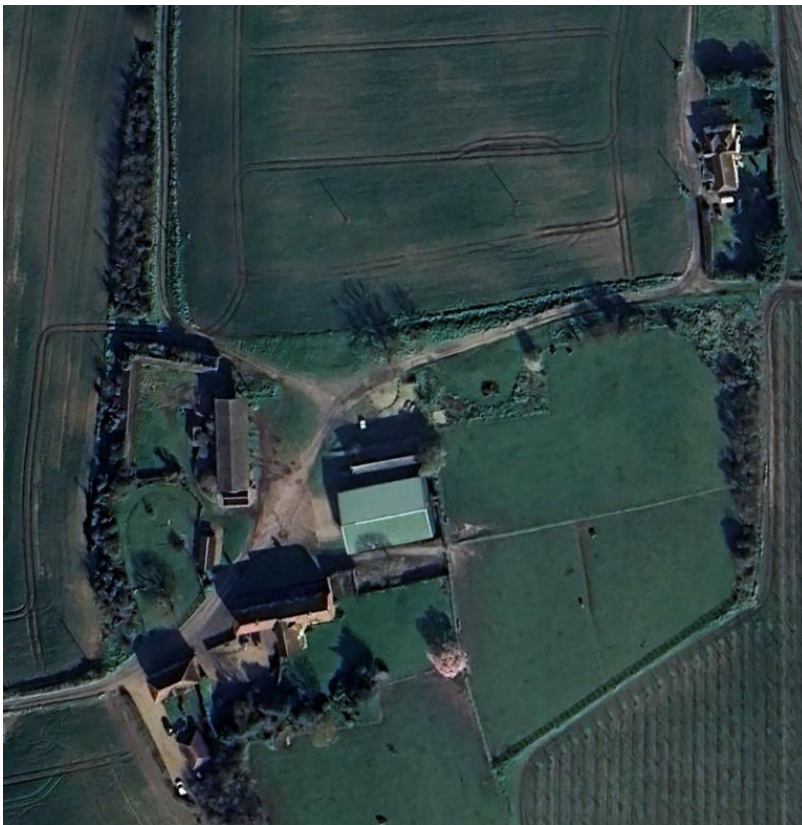
2013



2018



2024

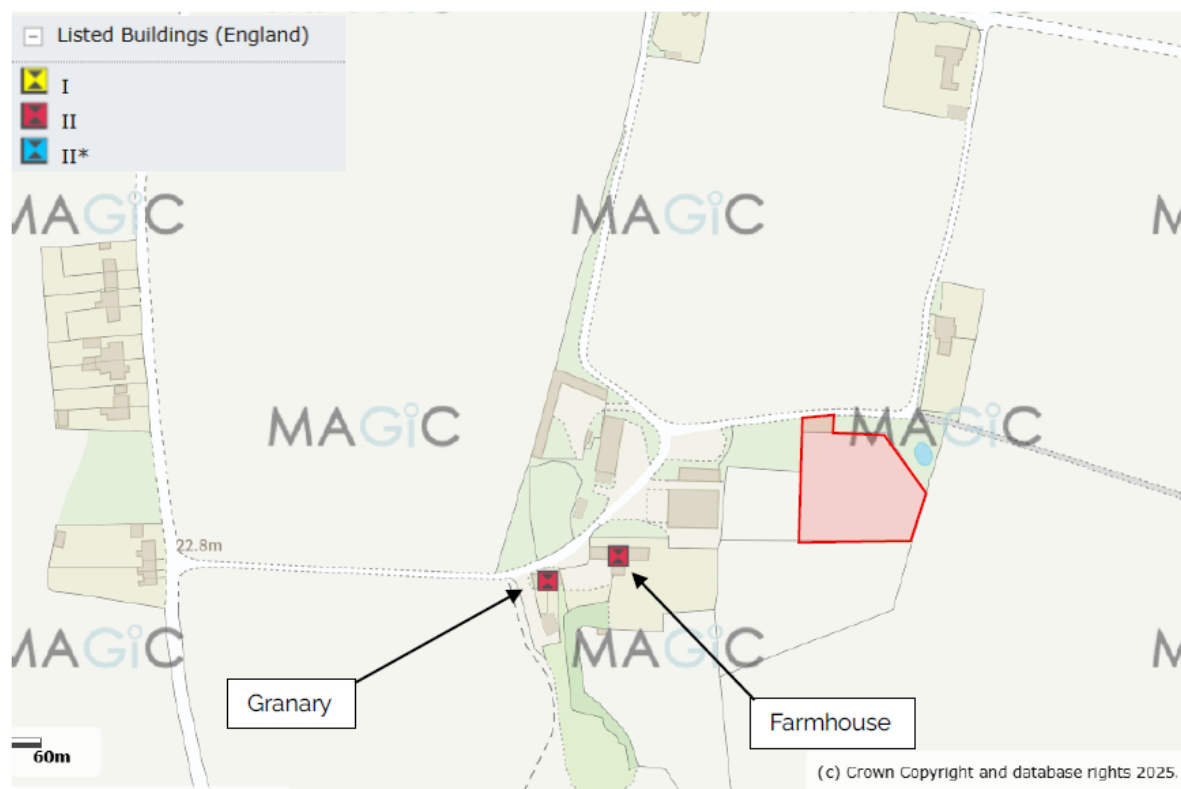


5.3 (b) What research have you undertaken to understand the significance of the heritage asset(s) affected?

Map regression (historic maps)	☒
Local Planning Authority sources	☒
Historic England sources	☒
Museum or Library (please provide details)	☐

6. What is important about the affected heritage asset(s) ('the significance')?

6.1 The Listed Buildings in the vicinity of the application site, which are all Grade II, are shown on the Magic map extract below. The extent of the site is also roughly indicated.

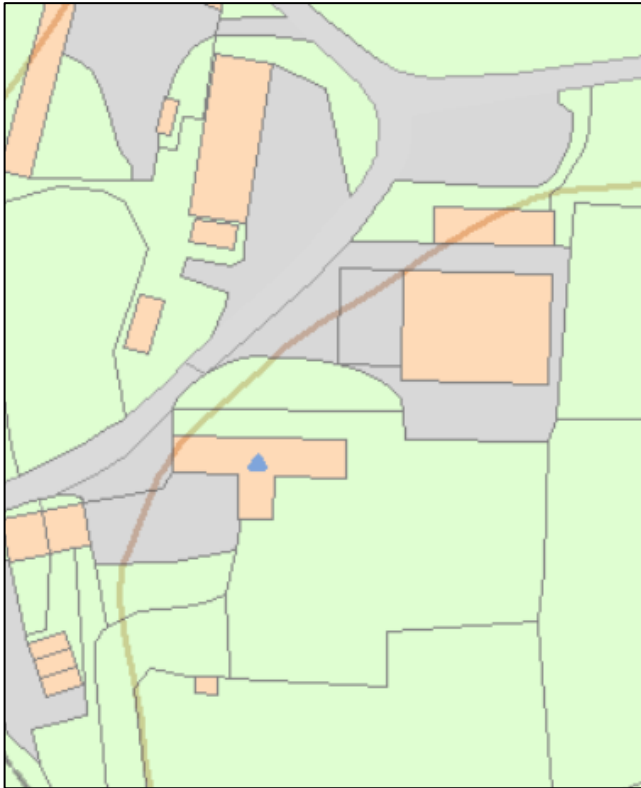


6.2 Green Farm House, is located to the west of the proposed development. It was listed on 21 November 1966 and the list description states as follows;

18th or early 19th century. Two-storey, T-shaped, brick farmhouse, comprising long north facade in 2 irregular sections with different roof levels, and projecting wing on the south, probably of later date. Gable ended roofs covered with clay tiles.

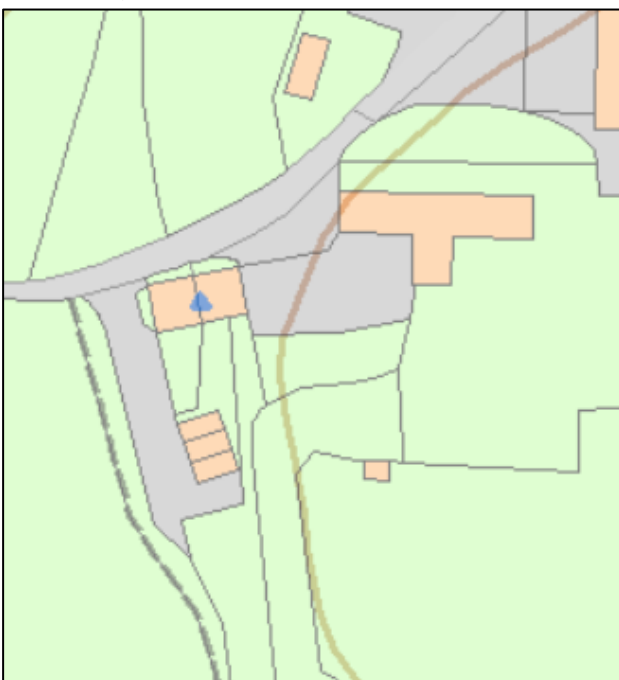
Five sash windows with glazing bars intact, the 3 ground floor windows at one side of the

house are casements. Off centre doorway a top flight of steps with plain iron handrails. Flat wooden hood on wood brackets over half-glazed door.



- 6.3** Green Farm Granary is located to the west of the Farmhouse. It was listed on 26 July 1983 and the list description states as follows.

18th century red-brick built 3-storey granary close to south-west corner of farmhouse. Clay tiled hipped roof. South side has had wing (probably a later addition) removed.



- 6.4** It is considered that the importance of the Farmhouse largely derives from its rather unusual 'T-shaped' design and the fact that from a distance the two distinct roof designs and elevational treatments give the appearance of two rather than a single dwelling.
- 6.5** In addition, the elevated nature of the Farmstead as a whole including the two heritage assets within it and their dominance over the landscape to the north and the surrounding area in general is also significant. The development of the Farmstead over many years with additional or replacement buildings to the north and east has however affected the overall setting of the two assets.
- 7. How will the proposals impact on the significance of the heritage asset(s) including their setting?**
- 7.1** The proposed development will not encroach into the area of the original farmstead. It lies to the east of the area of the farm where activity was originally centred and associated with the House and Granary. There will be no direct physical impact on either of the designated assets.
- 7.2** The images below are photograph taken in July 2024 from Lower Road to the north of the Farmstead and from Green Lane to the north east of the farm access road.



View from Lower Road looking South towards application site.

From this direction The Granary is not visible and is obscured by the existing farm buildings. Some of the application site is visible, but there is clear visual separation from the Farmhouse.



View looking South East from Green Farm Lane (north of farm access road)

From this direction the separation of the Granary from the site is clearer. Again the existing buildings and landscaping/planting intervene and prevent conjoined views of the site and the heritage assets to its west.

- 7.3** In terms of the potential impact of the development on the significance of The Granary it is considered therefore that the proposed development is sufficiently distant from The Granary such that there will be no discernible impact on the setting of The Granary. Any impact is mitigated by the site's topography and existing landscaping/vegetation which will not be affected by the development. Furthermore, The Granary is also clearly separated from the application site by the existing farmhouse and existing farm buildings.
- 7.4** As such there is considered to be no impact on the significance of The Granary arising from the development.
- 7.5** With regards to the Farmhouse clearly this building is more closely associated with the application site. However, the setting of the Farmhouse is dominated by the existing Agricultural building located between the site and the Farmhouse. This is shown in the following photograph.



- 7.6 Reference to the historic mapping set out earlier in this Statement clearly indicates that the application site has not historically formed part of the curtilage of the Farmhouse. There have always been farm buildings located to the east/north east of the Farmhouse which have defined the boundary of the Farmstead. The current physical separation between the site and the Farmhouse/Farmstead will also be maintained as there will be intervening undeveloped land between the site and the physical curtilage of the Farmhouse that will be maintained.
- 7.7 The proposed stable building has been moved towards the site's northern boundary on a lower area of the site. This change will ensure that the existing green barn to the west of the site potentially obscure more of the potential views of the stable building from the Farmhouse. The hedgerow and trees and lower land levels will continue to mitigate and reduce any visual linkage particularly when viewed from Lower Road. The proposed development particularly the buildings are not uncommon features in rural areas and of a design that respects the rural location. In reality it is considered that the proposed development will be read as part of the farmstead which has gone through change over the years.
- 7.8 The proposed development is not such that substantial harm to the Farmhouse will result either as a direct physical impact on the asset itself or in terms of its impact on its setting.
- 7.9 Clearly some impact on setting is likely to result from the development but it is contended that this will be less than substantial and toward the lower end of any scale of harm, given that from publicly accessible areas such as the PROW that passes through the Farmstead, the development and the designated asset will not be viewed or read together when in close proximity to the application site. It is only in the wider context of the site and surrounding area that the relationship of the site to the asset is discernible. The likely relationship will not be markedly different to that of the existing farm buildings and the Farmhouse.
- 8. How has the proposal been designed to conserve the significance of the heritage asset(s) including their setting?**
- 8.1 The primary focus of the design is to ensure the development is designed and sited to ensure that there was no further erosion of the separation between Green Farm House and the associated buildings that comprise its setting, and the farmyard to its west. This has been achieved and the current extent of the curtilage of the Farmhouse nor the Granary, will not be eroded any further as a result of the development. The removal of the hay-barn from the proposals has enabled a greater degree of separation from the proposed buildings and the western section of the site and the existing buildings including the Farmhouse beyond the Site's boundary.
- 8.2 As set out above the key element of the setting of Green Farm House and The Granary is their elevated location and exposure to views from the north from

Lower Road and Green Farm Lane beyond the main access to the holding and Farmstead. This relationship and setting will not be compromised by the new buildings which will; not intrude above the existing large agricultural building immediately to the north east of the farmhouse.

- 8.3** The second focus of the development's design was to ensure the proposed stable building is no taller and larger in terms of footprint than it needs to be to meet the applicant's requirements and to ensure appropriate, safe and efficient operation of the building and also the welfare of horses in the stable building. The change in the location of the stable building further serves to assist mitigation and the location of the sand-school to the south of the stables will ensure development is tightly grouped whilst at the same time minimising visibility from the PROW and respecting the setting of the designated heritage assets.

9. Conclusions

- 9.1** The proposed development has been designed from the outset with its potential impact on the significance of designated heritage assets in the vicinity of the application site in mind. It has also been borne in mind that the assets are not of the highest level of significance, i.e that which would be afforded to Grade I or II* assets for example.
- 9.2** The development maintains the integrity of the setting and strong boundaries to the grouping of the heritage assets.
- 9.3** The introduction of the proposed development will clearly result in some visual change in the site's appearance and its relationship to its surroundings. Such a visual change in the relationship between original farmsteads and modern farm complexes that have also in many cases diversified over-time, is a common occurrence in the countryside in general.
- 9.4** Whilst the proposals will result in a further change on the site, it is one which will result in less than substantial harm to the significance of the Heritage Assets in the vicinity of the site. This derives from the fact that the proposals will not affect the principal element of their significance which lies in the historic relationship between the Farmhouse and The Granary and their relationship to the open land to the north of the Farmstead emphasised by their elevated position.
- 9.5** As such, the proposals are considered to be in accordance with the statutory requirement set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, the Framework, NPPG and Development Plan policy.

Contact details:

County Archaeology Team

heritageconservation@kent.gov.uk

Historic Environment Record

heritageconservation@kent.gov.uk

Historic England

www.historicengland.org.uk

Local Planning Authority

Gravesham Borough Council <https://www.gravesham.gov.uk/>