

Heritage Statement.

Land off Chalk Road, Lower Higham.

On behalf of Richborough.

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Author: Rebecca Ward and Harry Payne



Document Management.

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1	12.08.2025	Rebecca Ward Principal Consultant – Heritage Harry Payne Senior Consultant – Heritage	Gail Stoten Executive Director – Heritage	-

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1. Introduction

- 1.1. Pegasus Group have been commissioned by Richborough to prepare a Heritage Statement to consider the proposed residential development at Land off Chalk Road, Lower Higham, in Kent, as shown on the Site Location Plan provided at Plate 1.

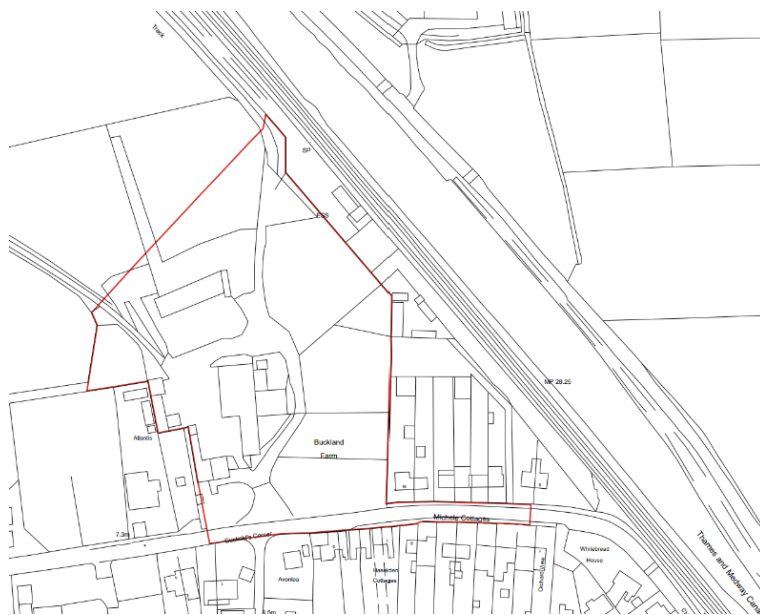


Plate 1: Site Location Plan.

- 1.2. The site is approximately 1.57 ha in area, encompassing the built form and courtyards at Buckland Farm and

associated paddocks. There are no designated heritage assets located within the site.

- 1.3. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹

- 1.4. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment and archaeological resource, following paragraphs 212 to 215 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

- 1.5. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be ***"proportionate to the assets' importance"***.²

¹ Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

² MHCLG, *NPPF*, para. 207.

2. Methodology

2.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, 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.

2.2. This assessment considers the archaeological resource and built heritage.

Sources

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

- The Kent Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the site;
- The National Heritage List for England for information on designated heritage assets;
- Historic maps available at the Kent Archives and History Centre and online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Historic England's Aerial Archaeology Mapping Explorer; and

- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's Soilscales Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

2.4. For digital datasets, information was sourced for a 1km study area measured from the boundaries of the site. Information gathered is discussed within the text where it is of relevance to the potential heritage resource of the site. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included as **Appendix 2**.

2.5. Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

2.6. Digital terrain model LiDAR data, at 1m resolution, is freely available from the Environment Agency. This was processed using ArcGIS software. Multiple hill-shade and shaded-relief models were created, principally via adjustment of the following variables: azimuth, height, and 'z-factor' or exaggeration. The models created were colourised using pre-defined ramps and classified attribute data. The DTM shaded relief model, with azimuths graduated by 45o intervals from 0–360o, is provided in **Appendix 8**.

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

Site Visit

- 2.8. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 8th April 2025, during which the site and its surrounds were assessed.

Geophysical Survey

- 2.9. A geophysical survey was undertaken across the accessible areas of the site in April 2025. No anomalies of definite archaeological interest were recorded. A tentative sub-circular anomaly was identified of uncertain origin. Strong magnetic disturbance associated with former buildings and made ground is mapped within the results, as well as existing fence lines. The results of the geophysical survey are discussed in Section 5 and a full copy of the report is included in **Appendix 9**.

Photographs

- 2.10. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken

without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

- 2.11. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 3**. However, for clarity, this methodology has been informed by the following:

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter GPA:2);⁴
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);⁵
- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter HEAN:1).⁶

³ Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2nd edition, Swindon, December 2017).

⁶ Historic England, *Historic England Advice Note 1 – Conservation Area Appraisal, Designation and Management* (HEAN:1) (2nd edition, Swindon, February 2019).

- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);⁷ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁸

Consideration of Harm

- 2.12. It is important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "substantial harm" or "less than substantial harm" to the identified designated heritage assets, in the context of paragraphs 214 and 215 of the *NPPF*.⁹ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.¹⁰

- 2.13. The *PPG* clarifies that within each category of harm ("less than substantial" or "substantial"), the extent of the harm may vary and should be clearly articulated.¹¹

- 2.14. The guidance set out within the *PPG* also clarifies that "substantial harm" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development which is to be assessed.¹² In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm 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."¹³

⁷ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

⁸ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

⁹ MHCLG, *NPPF*, paras. 214 and 215.

¹⁰ MHCLG, *NPPF*, para. 216.

¹¹ MHCLG, *Planning Practice Guidance (PPG)*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹² MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹³ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

3. Site Description and Planning History

Site Description

- 3.1. The site is approximately 1.57 ha in area, encompassing the built form and courtyards at Buckland Farm and associated paddocks. The paddocks are located across the eastern half of the site while the wider Farm is located on the western half; the two are separated by an access road from Chalk Road to the south.
- 3.2. The boundaries of the site are a mixture of low hedgerows and fences, with interspersed trees. Agricultural land surrounds the site on its northern and western sides, while private residences lining Chalk Road make up the wider surrounds. The North Kent Railway line runs along the boundary of the northeast edge of the site.



Plate 2: Northwards view into the site from the access road off Chalk Road.



Plate 3: The existing built form and courtyards within the site.



Plate 4: The paddock land within the site and the residential development along Chalk Road beyond.



Plate 5: North-westwards view overlooking the surrounding agricultural land from the northern edges of the site.



Plate 6: North-eastwards view towards the adjacent railway line on the northern side of the site.

Planning History

- 3.3. A review of the Gravesham Borough Council online planning application viewer indicates that the land within the site has been the subject of a number of planning applications, mainly associated with Buckland Farm and changes of use.
- 3.4. A historic application for land to the east of Buckland Farm adjacent to 16 Michele Cottages (LPA ref. 19881137) for outline residential development was refused on 24th February 1989. This was focused on the south-eastern extent of the site. Matters relating to the historic environment were not a reason for refusal.

4. Policy Framework

Legislation

- 4.1. 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 their settings and Conservation Areas.¹⁴
- 4.2. In addition to the statutory obligations set out within the aforementioned Act, 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.¹⁵
- 4.3. Full details of the relevant legislation are provided in **Appendix 4**.

National Planning Policy Guidance

- 4.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (NPPF), an updated version of which was published in December

2024. The NPPF is also supplemented by the national *Planning Policy Guidance* (PPG) which comprises a full and consolidated review of planning practice guidance documents to be read alongside the NPPF and which contains a section related to the Historic Environment.¹⁶ The PPG also contains the *National Design Guide*.¹⁷

- 4.5. Full details of the relevant national policy guidance are provided within **Appendix 4**.

The Development Plan

- 4.6. Applications for Planning Permission are currently considered against the policy and guidance set out within Gravesham Local Plan Core Strategy (adopted September 2014) and the Saved Policies from the Gravesham Local Plan First Review (1994) which was largely replaced by the 2014 Local Plan.
- 4.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 6**.

¹⁴ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

¹⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹⁶ Ministry of Housing, Communities & Local Government (MHCLG), *Planning Practice Guidance: Historic Environment* (PPG) (revised edition, 14th February 2024), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹⁷ Ministry of Housing, Communities & Local Government (MHCLG), *National Design Guide* (London, January 2021).

5. The Historic Environment

5.1. This section provides a review of the recorded heritage resource within the site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains.

5.2. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix EKE and HER 'monument' numbers have the prefix MKE or MWX and are referred to using their 'PrefRef' number.

5.3. A gazetteer of relevant heritage data is included as **Appendix 1**. Designated heritage assets and HER records are illustrated on Figures 1–3 in **Appendix 2**.

Previous Archaeological Works

5.4. A geophysical survey was undertaken across the accessible areas of the site in April 2025. No anomalies were identified which were interpreted as being of definite archaeological interest. A tentative sub-circular anomaly was recorded, of uncertain origin although an archaeological origin cannot be ruled out, even though it is most likely to be a result of agricultural or modern processes. Magnetic disturbance has also been identified across the site due to fencing, made ground and demolished buildings. A full copy of the Geophysical Survey Report is included in **Appendix 9**.

5.5. The site has been part of the study area for various surveys, including the following:

- Historic Environment of the North Kent Coast: Rapid Coastal Zone Assessment Survey Phase 1 in 1999–2000 (EKE10278);
- Archaeological Survey of Mineral Extraction Sites around the Thames Estuary in 2004 (EKE14761).
- The Grain to Shorne Gas Pipeline Assessment, field waking programme and geophysical survey in 2006–2007 (EKE17269, EKE17316, EKE17318);
- Test pitting as part of a Palaeoenvironmental Evaluation at the Isle of Grain in 2008 (EKE13337); and
- Various assessments as part of the Hoo Peninsula Project in 2009–2012 (EKE13239, EKE15020–21, EKE15400).

5.6. A desk-based assessment of the Thames and Medway Canal was undertaken immediately north-east of the site in 2008 (EKE12218).

5.7. Previous archaeological works undertaken in the wider surrounds of the site are depicted on Figure 2 and comprise the following:

- Evaluation and watching brief on the Isle of Grain to Shorne pipeline c. 180m north of the site and geoarchaeological boreholes c. 600m north-east of the site in 2007–08 (EKE10064, EKE10144, EKE12719);

- An excavation at the North Kent Railway c. 185m north of the site in 1861 (EKE20885);
- A geotechnical survey at Queens Farm c. 690m north-west of the site in 1991 (EKE8106);
- A watching brief at Gore Green Farm c. 770m east of the site in 2020 (EKE22446);
- An excavation at Barrow Hill c. 900m north of the site in 1880 (EKE4744);
- Watching brief at White House Farm c. 930m south-east of the site in 2012 (EKE11991); and
- An excavation at St Giles, Merston c. 950m south-west of the site in 1956 (EKE4165).

5.8. The results of these works are discussed below, where relevant to the potential archaeological resource of the site.

Topography and Geology

- 5.9. The topography of the site lies relatively level at approximately 5m aOD.
- 5.10. The solid geology of the site is mapped as Thanet Formation comprising sand, silt and clay formed between 59.2 and 56 million years ago during the Palaeogene period.¹⁸ No superficial geology is mapped within the eastern and southern extents of the site. A band of Head,

comprising clay, silt, sand and gravel formed between 2.588 million years ago and the present during the Quaternary period is mapped as extending into the north-western extent of the site.

- 5.11. The soils within the site are characterised as freely draining, slightly acidic, loamy soils.¹⁹

Archaeological Baseline

Prehistoric (pre-43 AD)

- 5.12. No anomalies suggestive of definite prehistoric activity were recorded within the site during the geophysical survey. A subcircular anomaly was identified within the eastern extent of the site, and has been given an uncertain origin. This feature is not shown on the LiDAR imagery of the site (**Appendix 8**). Due to the presence of the cropmark of a possible Bronze Age round barrow, visible as a ring ditch, c. 280m west of the site an archaeological origin cannot be ruled out, although the geophysical survey report notes that the response is most likely to be as a result of agricultural or modern practices (MKE91153, TQ 77 SW 193). The cropmark remains of a second Bronze Age ring ditch were identified c. 865m south-west of the site (MKWE2689, TQ 77 SW 25).
- 5.13. A prehistoric pit containing fragments of fired clay, fire-cracked flints and charcoal was identified during the watching brief along the route of the Grain to Shorne

¹⁸ British Geological Survey, *Geology of Britain Viewer*, <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>.

¹⁹ Cranfield University, *Soilscapes*, <http://www.landis.org.uk/soilscapes/>.

- Pipeline c. 515m north-east of the site (MKE43070, TQ 77 SW 102, EKE10144).
- 5.14. A Bronze Age cist burial was recorded at Higham Marshes c. 900m north of the site in 1880, and has been located by the HER at generic grid reference TQ 70 73, as the exact location is uncertain (MKE2675, TQ 77 SW 11, EKE4744). The burial was accompanied by 79 beads which appeared to have originated as a necklace.
- 5.15. During excavations for gravel c. 980m north-west of the site, a Bronze Age founders hoard was recorded, which comprised socketed celts and lumps of coal (MKE2666, TW 77 SW 23).
- 5.16. A large quantity of findspots of prehistoric date have been identified in the surrounds of the site which were largely recorded during metal detecting surveys. The location of these findspots is shown on Figure 3 and they are described in the table in **Appendix 1**. These include flint artefacts of Palaeolithic to Neolithic date which were recorded as chance finds as well as Bronze Age and Iron Age metal objects.
- Romano-British (AD 43 – 410)
- 5.17. No anomalies suggestive of Romano-British activity were recorded within the site during the geophysical survey.
- 5.18. Documentary evidence suggests that Roman pottery works were evident around the Higham area, and have been located by the HER as c. 55m west of the site at generic grid reference TQ 70 73 (MKE2674, TQ 77 SW 10). Large quantities of pottery were recorded along the edges of the marsh, and in the wider surrounds (outside of the study area) pottery kilns have been recorded.
- 5.19. During excavations for gravel c. 980m north-west of the site, Roman cremation burials were identified in the vicinity of the Bronze Age burial (MKE2666, TW 77 SW 23).
- 5.20. A large quantity of findspots of Romano-British date have been identified in the surrounds of the site which were largely recorded during metal detecting surveys. The location of these findspots is shown on Figure 3 and they are described in the table in **Appendix 1**. These comprise silver, lead and copper alloy objects including coins, buckles, harness mounts and rings.
- Early medieval (410 AD – 1066) and Medieval (1066 – 1539)
- 5.21. The site was historically located in the parish of Higham and most likely formed part of the agricultural hinterland to this settlement during the medieval period. No anomalies suggestive of medieval activity were recorded within the site during the geophysical survey.
- 5.22. During excavations for quarrying c. 980m north-west of the site, a small number of early medieval burials were recorded which were associated with grave goods including brooches, dress pins, knives and swords (MKE2666, TW 77 SW 23). The finds largely dated from the early 6th century. The cemetery possibly relates to a settlement known as 'Bulan Ham', once of the bounds named in a grant of land at Higham by Offa to the Archbishop of Canterbury in AD 774, although this is uncertain.
- 5.23. A number of buildings located in the wider surrounds of the site originated during the medieval period and comprise the following:

- Higham Hall and the associated garden walls c. 235–280m south of the site (MKE27692–93, TQ 77 SW 1006, TQ 77 SW 1008);
- Gore Green Farmhouse c. 595m east of the site (MKE27685, TQ 77 SW 1021);
- Gore Green Farm Barn c. 795m east of the site (MKE27851, TQ 77 SW 1014); and
- White House Farm and the Barn c. 890–925m south-east of the site (MKE27691, TQ 77 SW 1039, MKE27774, TQ 77 SW 1011).

5.24. The medieval village of Merston lies c. 895m south-west of the site (MKE2678, TQ 77 SW 14, EKE4165). The village was deserted by AD 1445 and excavation during the 1950s recorded the foundations of the Church of St Giles.

5.25. An area of medieval to post-medieval ridge and furrow earthworks were identified adjacent to the canal and were mapped from aerial photographs c. 315m north of the site (MKE122973, TQ 77 SW 1128). Possible ridge and furrow earthworks were also recorded c. 640m south-west of the site (MKE43330, TQ 77 SW 177). A plough headland of likely medieval date was identified c. 755m north of the site (MKE122974, TQ 77 SW 1129).

5.26. A large quantity of findspots of early medieval and medieval date have been identified in the surrounds of the site which were largely recorded during metal detecting surveys. The location of these findspots is shown on Figure 3 and they are described in the table in **Appendix 1**. These comprise silver, copper alloy and lead objects including coins, brooches, buckles, buttons and pins.

Post-medieval (1540 – 1750), Early Modern (1750 – 1901), Modern (1901 – present)

5.27. The approximate location of the site is depicted on the Higham Tithe Map of 1841 (Plate 7). The site comprised part of two land parcels within Higham parish.

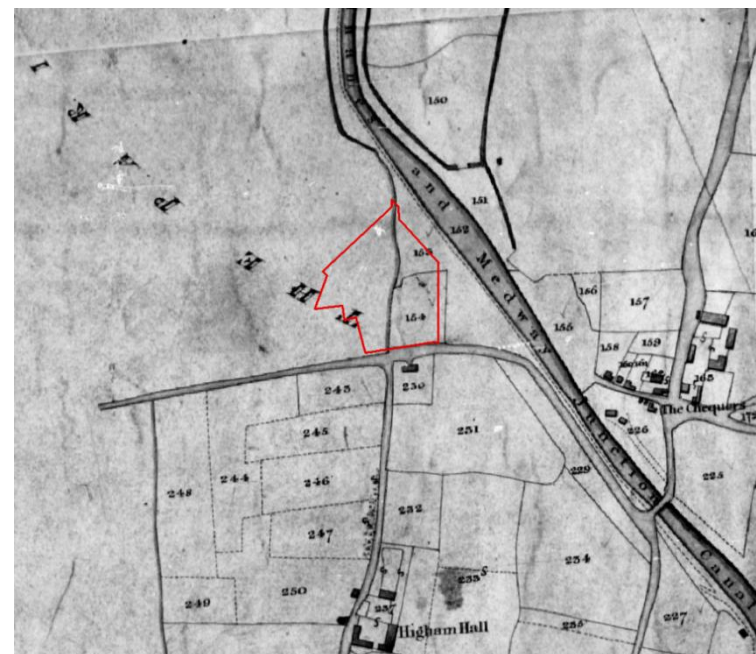


Plate 7: Extract from the Higham Tithe Map of 1841, approximate site area outlined in red.

5.28. Land parcel 154 was under the ownership of the Mercers Worshipful Company and the occupancy of Mary Tadman and comprised pasture known as *The Hundred Acres*. Land parcel 153 was under the ownership of the Thames and Medway Junction Canal company and the occupancy of William Woodhams and comprised *Wall* which was part rough pasture and part arable. The map

notes that the western extent of the site was located within the parish of Chalk (no Tithe Map available). The Thames and Medway Canal is shown to the east of the site (MKE1546, TQ 67 SE 20) and a farmstead at Cuckold's Corner is shown to the south of the site (MKE83231). Higham Hall is depicted further south of the site (MKE83232).

- 5.29. The approximate location of the site is shown on the Ordnance Survey Map of 1870 (Plate 8). The site comprised a mixture of agricultural land, woodland and orchard planting. A track runs through the site in a north-westerly orientation, and a footpath connected Chalk Road to the railway. The North Kent Railway had been established along the north-eastern boundary of the site, which formed the existing site edge (MKE44036, TQ 57 SE 277). The station lies c. 495m south-east of the site (MKE8354, TQ 77 SW 88). Haselden Cottages have been constructed to the south of the site.

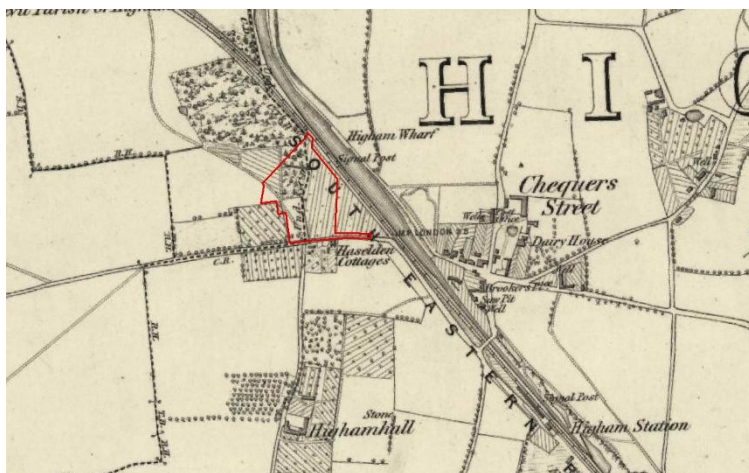


Plate 8: Extract from the Ordnance Survey Map of 1870, the site outlined in red.

- 5.30. The approximate location of the site is shown on the Ordnance Survey Map of 1908 (Plate 9). The site comprised part of a large agricultural land parcel and an area of orchard planting in the western extent. Two stones are marked within and immediately adjacent to the site, along the trackway. A boundary stone is currently positioned on the grass verge at the entrance into the site from Chalk Road. This is may have represented the boundary between Chalk Extra and Higham, with symbols C + and H. Discussions with the existing tenant on the site confirm that they found the stone discarded within a hedgerow near the railway line and restored the stone to its roadside position in 1994, albeit not in its original location (Plate 10). There are a number of stones marked on the Ordnance Survey maps, and this stone could represent either one of these.

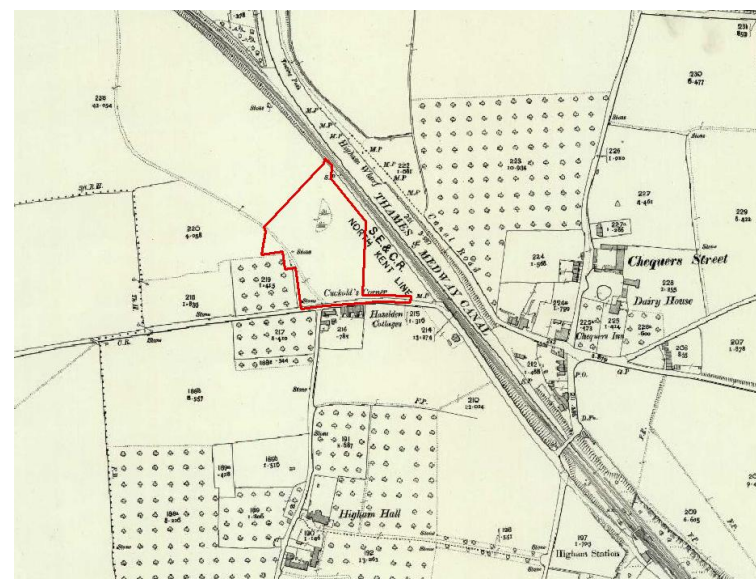


Plate 9: Extract from the Ordnance Survey Map of 1908, the site outlined in red.



Plate 10: The existing boundary stone located at the access point into the site.

- 5.31. The approximate location of the site is shown on the Ordnance Survey Map of 1933 (Plate 11). No major changes are shown within the site itself. Further development along Chalk Road has been constructed to the south-east of the site and further orchard planting has been established in the wider surrounds.

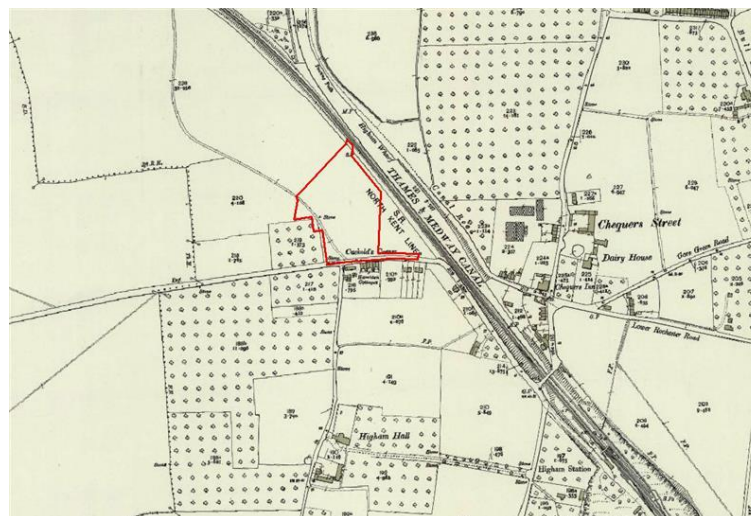


Plate 11: Extract from the Ordnance Survey Map of 1933, the site outlined in red.

- 5.32. The approximate location of the site is shown on the Ordnance Survey Map of 1946 (Plate 12). No major changes are shown within the site or in the wider surrounds on this mapping.
- 5.33. The approximate location of the site is shown on the Ordnance Survey Map of 1974 (Plate 13). The farmstead within the site had been established by this point.

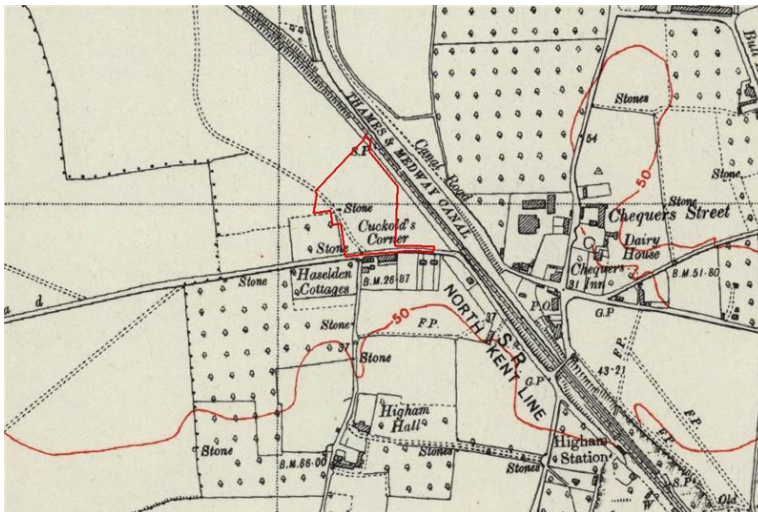


Plate 12: Extract from the Ordnance Survey Map of 1946, the site outlined in red.

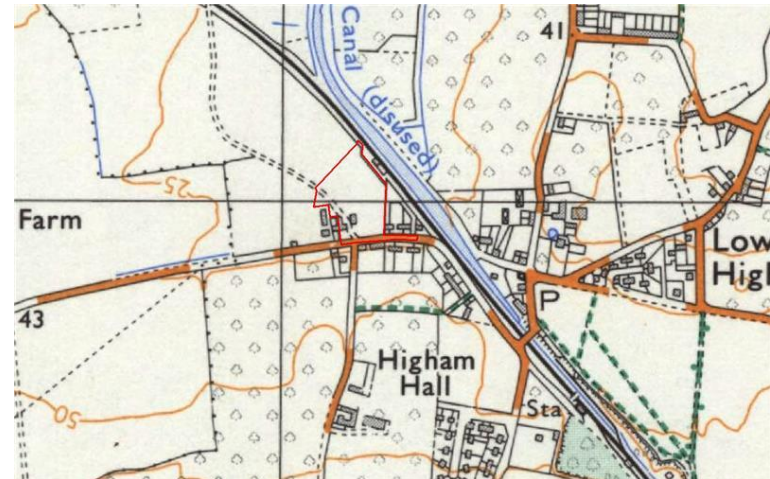


Plate 13: Extract from the Ordnance Survey Map of 1974, the site outlined in red.

- 5.34. During the latter half of the 20th century, the farmstead within the site expanded and the parcels in the eastern extent were divided into paddocks (Plate 14). None of the buildings within the site are considered to be of sufficient interest to be heritage assets.



Plate 14: Modern aerial image of the site, approximate site area outlined in red.

The wider area

- 5.35. A number of buildings and structures were constructed during the post-medieval to modern periods in the surrounds of the site. These comprise farmsteads and structures associated with the First and Second World Wars. The location of these is shown on Figure 3 and are described in the table in **Appendix 1**.

- 5.36. A large quantity of findspots of post-medieval date have been identified in the surrounds of the site which were largely recorded during metal detecting surveys. The location of these findspots is shown on Figure 3 and they are described in the table in **Appendix 1**. These comprise silver and copper alloy objects including coins, buckles and mounts and a gold finger ring.

Undated

- 5.37. A system of enclosures on either side of a trackway were recorded as cropmarks on aerial photographs c. 565m south-west of the site (MKE43327, TQ 77 SW 176). Large pits were identified within the enclosures.
- 5.38. Cropmarks of a potential occupation floor which was visible on aerial photographs was recorded c. 600m south-west of the site (MKE9493, TQ 77 SW 46).
- 5.39. The cropmark remains of an enclosed settlement were identified on aerial photographs c. 605m south-west of the site (MKE2688, TQ 77 SW 24). This is likely to represent a multiphase settlement comprising conjoined enclosures with a central trackway, numerous internal pits and associated ditches. It could have later prehistoric or Romano-British origins, but traces of a large building suggest it could be early medieval or later.
- 5.40. The cropmark of a number of pits were also identified on aerial photographs c. 680m south-west of the site and are of uncertain date (MKE9492, TQ 77 SW 45).
- 5.41. The earthwork remains of two parallel banks were identified c. 870m north of the site (MKE122976, TQ 77 SW 1130). These may represent former field boundaries.

Statement of Archaeological Potential and Significance

- 5.42. No anomalies suggestive of definite archaeological remains of prehistoric date were recorded within the site during the geophysical survey. A sub-circular anomaly was identified within the site during the geophysical survey, although this has been determined to be of uncertain origin, most likely of agricultural origin rather than archaeological origin, despite the presence of a ring ditch to the west of the site. There is limited evidence for prehistoric activity in the wider surrounds of the site, with the exception of findspots. On this basis, the potential for significant archaeological remains of prehistoric date within the site is considered to be low.
- 5.43. No anomalies suggestive of significant archaeological remains of Romano-British date were recorded within the site during the geophysical survey. There is limited evidence for Roman activity in the wider surrounds of the site, with the exception of findspots. On this basis, the potential for significant archaeological remains of Romano-British date within the site is considered to be low.
- 5.44. The site was historically located in the parish of Higham and most likely formed part of the agricultural hinterland to this settlement during the medieval period. No anomalies suggestive of medieval activity were recorded within the site during the geophysical survey. There is evidence of medieval activity in the wider surrounds of the site, mainly comprising buildings which originated at this time. On this basis, the potential for significant archaeological remains of medieval date within the site is considered to be low.

- 5.45. From the mid-19th century onwards, the site has comprised a mixture of agricultural land, orchard planting and development associated with the modern Buckland Farm. None of the buildings within the site are considered to be of sufficient interest to be heritage assets and they will be removed as part of the development proposals. The geophysical survey within the site recorded evidence of modern interference, including fencing, made ground and landscaping. The potential for significant archaeological remains of post-medieval to modern date within the site is considered to be low.

Designated Heritage Assets

- 5.46. No designated heritage assets lie within or in the immediate vicinity of the site.
- 5.47. The Lower Higham Conservation Area lies c. 175m east of the site and includes a single Grade II Listed Building, Dairy Farmhouse which lies c. 325m east of the site (1381167).
- 5.48. A group of three Grade II Listed Buildings lie c. 230–335m south of the site, comprising Higham Hall, Barn at Higham Hall and Garden Walls to Higham Hall (1096338–9, 1350231).
- 5.49. Designated heritage assets in the vicinity of the site are considered in further detail in the Setting Assessment Section below.

6. Setting Assessment

- 6.1. Step 1 of the methodology recommended by the Historic England guidance *GPA:3* (see 'Methodology') is to identify which heritage assets might be affected by a proposed development.²⁰
- 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, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 6.4. The Grade II Listed Dairy Farmhouse has been identified for further assessment on the basis of visual and historic connections.
- 6.5. The Lower Higham Conservation Area lies c. 175m east of the site, separated by intervening residential development, the North Kent Railway, and mature vegetation. Views of the Conservation Area from the site, are limited to faint glimpses of some building rooftops, including the Grade II Listed Dairy Farmhouse. The site is

not visible from within the Conservation Area. Such visual connections are not considered to form part of the 'experience' of the asset, and as such the site does not form part of the setting of the asset. The land within the site is not considered to contribute to the overall heritage significance of the Lower Higham Conservation Area, and therefore it has not been taken forwards for further assessment.

- 6.6. A group of three Grade II Listed Buildings lie c. 230–335m south of the site, comprising Higham Hall, Barn at Higham Hall and Garden Walls to Higham Hall. The site is separated from the Listed Buildings by intervening built form and agricultural land. There is no intervisibility between the Site or the Listed Buildings, nor are there any historical associations. The land within the site is not considered to contribute to the overall heritage significance of the Grade II Listed Buildings at Higham Hall. Therefore, the assets have not been considered for further assessment.
- 6.7. With regard to other heritage assets in the vicinity of the site, assessment has concluded that the site does not form any part of setting that contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of these assets.

²⁰ Historic England, *GPA:3*, p. 4.

Dairy Farmhouse

- 6.8. The Grade II Listed Dairy Farmhouse lies c. 325m east of the site (NHLE 1381167). Dairy Farmhouse was added to the National List on 28th July 2000 with the following description:

"Farmhouse. Late C17 or early C18, refenestrated in original openings and porch and small east extension added in late C19 or early C20. Built of red brick in Flemish bond with steeply pitched hipped tiled roof with two end brick chimneystacks. Doublefronted plan. Two storeys and attics: 5 windows to original part, one storey one window to addition. Front elevation has moulded rubbed brick eaves course with half brick projecting full height piers at either end. Two tiled gabled dormers with rendered cheeks and 3 over 6 glazing bars with horns. Other floors have 6 over 6 sash windows with horns with rubbed brick voussoirs and rendered and painted cills. Central single panelled raised and fielded front door with central entrance portico, square piers and moulded cornice, rendered and painted. East extension is single storied of brick with hipped tiled roof, 6 Over 6 glazing bar sash with horns to front and double sash without glazing bars but with horn to east side. Rear extensions housing domestic services. INTERIOR: Window shutters to ground floor rooms. Three timber panelled rooms. Fireplaces to all rooms with two ground floor fireplaces have built in cupboards. Early panelled doors and joinery details and narrow service stairs from kitchen to upper floor. Bell system with wires leading to the kitchen survives."

- 6.9. A full copy of the List Entry is included at **Appendix 7**.

- 6.10. The Listed Building is located on an elevated position, surrounded on all sides by its associated grounds (Plates 15–17). The building's principal elevation faces south, overlooking a formal garden area, which is accessed from Lower Rochester Road to the south.

- 6.11. Mature trees are planted close around the building, as well as interspersed across the surrounding gardens, which obscures clear views towards the Listed Building from the wider public. To the north of the Farmhouse are a group of former agricultural buildings and work yards, which were formerly associated with the Farmhouse and farm operations.



Plate 15: Northwards view towards Dairy Farmhouse from Lower Rochester Road.



Plate 16: The western elevation of Dairy Farmhouse.



Plate 17: The adjacent former farm complex, with oast house.

Statement of Significance

- 6.12. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*. This significance is consolidated by its inclusion within the boundaries of the Lower Higham Conservation Area.
- 6.13. The heritage significance of the Dairy Farmhouse is principally embodied in its physical fabric which derives historic and architectural interest as a well-preserved example of a late 17th-/18th-century vernacular farmhouse, which has experienced modest alteration overtime.
- 6.14. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived 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 attached grounds and gardens which surround the Farmhouse and share a spatial and visual relationship with the asset;
 - The former agricultural buildings and work yards to the north and share a spatial and visual relationship with the asset which illustrates their historic functional relationship; and
 - The elevated positioning of the Farmhouse at the corner of Lower Rochester Road and Church Street, which the Farmhouse appears to have been deliberately sited close to.

Contribution of the Site

- 6.15. The application site is located c. 325m west of the Listed Dairy Farmhouse, separated by intervening built form, mature vegetation and the North Kent Railway.
- 6.16. The site is not visible in views from the Listed Building or its immediate surrounds, due to intervening vegetation and built form (Plate 19). From within the site, the Listed Building is only partially visible, with filtered glimpses of its upper elements, primarily from the access road and paddocks located on the eastern side (Plate 18). Limited views of the roofline of an oast house, formerly associated with the Farmhouse, are also available from certain points within the site.



Plate 18: Eastwards view of the rooftop of Dairy Farmhouse from the roadside entrance into the site off Chalk Road.



Plate 19: Westwards view towards the site from Church Street, adjacent to the Listed Building.

- 6.17. As noted above, on the 1841 Tithe map for the parish of Higham, the site formed part of two land parcels (Plots 153 and 154) within the parish. Plot 154, identified as pastureland known as "The Hundred Acres," was part of the same landholding as Dairy Farmhouse. At the time, the land was owned by the Mercers' Worshipful Company and was occupied by Mary Tadman. Tithe apportionment records from 1883 indicate that the site and the Listed Building remained under common ownership, though by then occupied by Thomas Whitebread. Therefore, the site and the Listed Building once shared an historical association. However, the area of land the site once formed a part of, has changed greatly, with the continued dissociation with the Listed Building and subsequent establishment of Buckland Farm which took control of the agricultural land on the site.

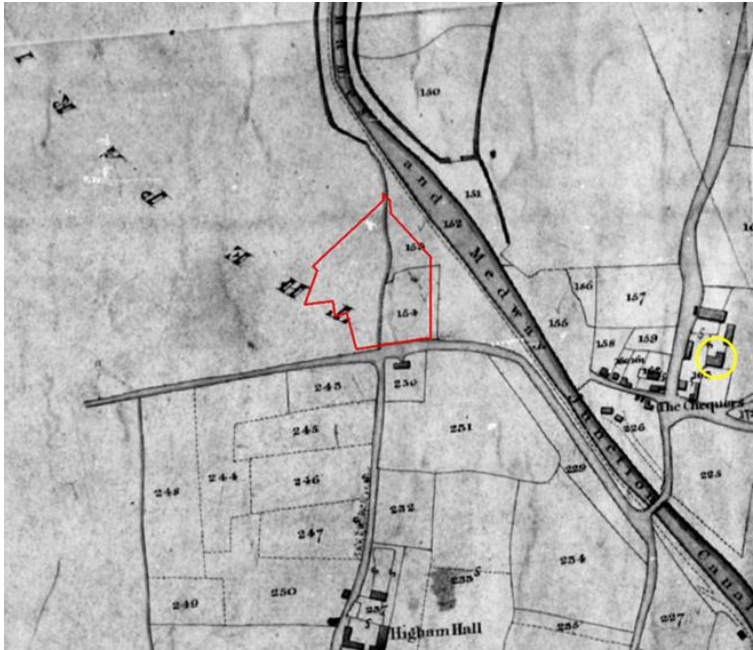


Plate 20: Extract from the Higham Tithe Map of 1841, approximate site area outlined in red and Dairy Farmhouse circled in yellow.

Impact Assessment

- 6.18. Overall, the site is not considered to contribute to the overall heritage significance of the Grade II Listed Dairy Farmhouse through setting.

- 6.19. The proposed development is not expected to be visible from the Listed Building or its wider grounds.
- 6.20. The proposed development will change the agricultural character and appearance of the site. However, as discussed, there is no invisibility or significant co-visibility with the site and Listed Building. Therefore, this change is not expected to interfere with the overall experience of the Listed Building. Furthermore, the former historic association between the site and the asset is no longer legible.
- 6.21. Accordingly, the proposed development within the site will result in no harm to the heritage significance of the Grade II Listed Dairy Farmhouse.

7. Conclusions

Archaeological resource

- 7.1. No anomalies suggestive of definite archaeological remains of prehistoric date were recorded within the site during the geophysical survey. A sub-circular anomaly was identified within the site during the geophysical survey, although this has been determined to be of uncertain origin, most likely of agricultural origin rather than archaeological origin, despite the presence of a ring ditch to the west of the site. There is limited evidence for prehistoric activity in the wider surrounds of the site, with the exception of findspots. On this basis, the potential for significant archaeological remains of prehistoric date within the site is considered to be low.
- 7.2. No anomalies suggestive of significant archaeological remains of Romano-British date were recorded within the site during the geophysical survey. There is limited evidence for Roman activity in the wider surrounds of the site, with the exception of findspots. On this basis, the potential for significant archaeological remains of Romano-British date within the site is considered to be low.
- 7.3. The site was historically located in the parish of Higham and most likely formed part of the agricultural hinterland to this settlement during the medieval period. No anomalies suggestive of medieval activity were recorded within the site during the geophysical survey. There is evidence of medieval activity in the wider surrounds of the site, mainly comprising buildings which originated at this time. On this basis, the potential for significant

archaeological remains of medieval date within the site is considered to be low.

- 7.4. From the mid-19th century onwards, the site has comprised a mixture of agricultural land, orchard planting and development associated with the modern Buckland Farm. None of the buildings within the site are considered to be of sufficient interest to be heritage assets and they will be removed as part of the development proposals. The geophysical survey within the site recorded evidence of modern interference, including fencing, made ground and landscaping. The potential for significant archaeological remains of post-medieval to modern date within the site is considered to be low.

Setting

- 7.5. No designated heritage assets lie within or in the immediate vicinity of the site.
- 7.6. Following detailed assessment, the proposed development will result in no harm to the overall heritage significance of the Grade II Listed Dairy Farmhouse.

Sources

Legislation
UK Public General Acts, Ancient Monuments and Archaeological Areas Act 1979.
UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
UK Public General Acts, Planning and Compulsory Purchase Act 2004.
UK Public General Acts, Town and Country Planning Act 1990.

Policy and Guidance
Chartered Institute for Archaeologists (CIfA), <i>Standard and Guidance for Historic Environment Desk-Based Assessment</i> (revised edition, October 2020).
Ministry of Housing, Communities & Local Government (MHCLG), <i>National Planning Policy Framework (NPPF)</i> (London, December 2024).
Ministry of Housing, Communities & Local Government (MHCLG), <i>Planning Practice Guidance (PPG)</i> (revised February 2024).
English Heritage, <i>Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment</i> (London, April 2008).
Historic England, <i>Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1</i> (2 nd edition, Swindon, February 2019).

Historic England, <i>Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning</i> : 2 (2 nd edition, Swindon, July 2015).
Historic England, <i>Statements of Heritage Significance: Analysing Significance in Heritage Assets</i> , Historic England Advice Note 12 (Swindon, October 2019).
Historic England, <i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3</i> (2 nd edition, Swindon, December 2017).

Court and Appeal Decisions
Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137.
Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).
Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.
Jones v Mordue [2015] EWCA Civ 1243.
Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin).
Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Cartographic Sources	
1841	Higham Tithe Map
1870	Ordnance Survey Map
1908	Ordnance Survey Map
1933	Ordnance Survey Map
1946	Ordnance Survey Map
1974	Ordnance Survey Map

Appendix 1: Gazetteer

Heritage Data

HER Event Data

Ev UID	Record Type	Name
EKE11991	INT	Watching brief at White House Farm, Higham
EKE12719	INT	Geoarchaeological boreholes, Grain pipeline route
EKE4165	INT	ST GILES,MERSTON
EKE4744	INT	BARROW HILL, 1880
EKE8106	INT	Queens Farm, Lower Shorne – Boreholes
EKE20885	INT	North Kent Railway Vicinity, 1861
EKE10064	INT	Evaluation of proposed Isle of Grain Gas Pipeline (Stage 1)
EKE10144	INT	Watching brief on the Isle of Grain-Shorne pipeline
EKE12218	NON	Desk based assessment of the Thames and Medway Canal
EKE10278	NON	Historic Environment of the North Kent Coast: Rapid Coastal Zone Assessment Survey Phase 1, 1999–2000

EKE13239	NON	Historic landscape characterisation and historic seascape characterisation, Hoo Peninsula Historic Landscape Project
EKE15020	NON	Hoo Peninsula, Kent. Hoo Peninsula Historic Landscape Project
EKE15021	NON	Hoo Peninsula, Kent. Hoo Peninsula Historic Landscape Project
EKE15400	NON	Hoo Peninsula, North Kent Coast, Thames Estuary:45 A Palaeoenvironmental Review of the Development of the Peninsula
EKE17269	NON	Desk-based assessment (component of Environmental Statement): Grain to Shorne Gas Pipeline
EKE17316	NON	Fieldwalking programme: Grain to Shorne Gas Pipeline
EKE17318	NON	Magnetometry survey along route of Grain to Gravesend gas pipeline
EKE13337	INT	Test pitting as part of a Paleoenvironmental Evaluation, Isle of Grain (2008)
EKE14761	INT	Archaeological survey of mineral extraction sites around the Thames Estuary
EKE22446	INT	Archaeological Watching Brief at Gore Green Farm, Gore Green Road, Higham, Kent ME3 7LT, 2022

HER Monument Data

Mon UID	Pref Ref	Name	Mon Type	Period
MKE2689	TQ 77 SW 25	Ring ditch	RING DITCH	Unknown

MKE2688	TQ 77 SW 24	Polygonal enclosed settlement – cropmark	ENCLOSED SETTLEMENT; TRACKWAY; DITCH; PIT; QUARRY?	Unknown
MKE2686	TQ 77 SW 22	1st cent Roman brooch, found at Higham Creek	FINDSPOT	Late Iron Age to Roman
MKE41705	TQ 77 SW 1044	The Knowle Second World War civil defence headquarters, School Lane, Higham	CIVIL DEFENCE BUILDING	Modern
MKE41837	TQ 77 SW 1050	Higham Hill First World War anti-aircraft battery, School Lane, Higham	ANTI AIRCRAFT BATTERY	Modern
MKE41706	TQ 77 SW 1045	The Chequers Second World War Emergency Mortuary, Canal Road, Higham	CIVIL DEFENCE BUILDING	Modern
MKE41736	TQ 77 SW 1048	Waterworks Second World War Home Guard hut, School Lane, Higham	MILITARY HEADQUARTERS	Modern
MKE41870	TQ 77 SW 1052	Home Farm Second World War Home Guard Battle Headquarters, Higham	BATTLE HEADQUARTERS	Modern
MKE41836	TQ 77 SW 1055	Gore Green Road Second World War fire hydrant, Higham	CIVIL DEFENCE BUILDING	Modern
MKE43070	TQ 77 SW 102	Feature recorded in Plot 10.1 on the Grain-Shorne Pipeline watching brief	PIT	Later Prehistoric
MKE43330	TQ 77 SW 177	Cropmarks of possible ridge and furrow	NARROW RIDGE AND FURROW?	Unknown

MKE66615	MKE66615	Iron Age copper alloy bow brooch	FINDSPOT	Late Iron Age to Roman
MKE66695	MKE66695	Post Medieval copper alloy buckle	FINDSPOT	Post Medieval
MKE66697	MKE66697	Medieval copper alloy brooch	FINDSPOT	Medieval
MKE66698	MKE66698	Medieval copper alloy dress fastener (unknown)	FINDSPOT	Medieval to Post Medieval
MKE66699	MKE66699	Medieval lead ampulla	FINDSPOT	Medieval to Post Medieval
MKE66712	MKE66712	Post Medieval coin	FINDSPOT	Post Medieval
MKE66713	MKE66713	Medieval silver coin	FINDSPOT	Medieval
MKE66714	MKE66714	Medieval seal	FINDSPOT	Medieval to Post Medieval
MKE66715	MKE66715	Post Medieval silver coin	FINDSPOT	Post Medieval
MKE66716	MKE66716	Early Medieval copper alloy pin	FINDSPOT	Early Medieval or Anglo-Saxon
MKE66725	MKE66725	Medieval copper alloy brooch	FINDSPOT	Medieval
MKE66726	MKE66726	Medieval lead bulla	FINDSPOT	Medieval
MKE66729	MKE66729	Post Medieval copper alloy medal	FINDSPOT	Post Medieval
MKE66730	MKE66730	Post Medieval copper alloy token	FINDSPOT	Post Medieval

MKE66739	MKE66739	Roman copper alloy coin	FINDSPOT	Roman
MKE66766	MKE66766	Medieval copper alloy seal matrix	FINDSPOT	Medieval
MKE66772	MKE66772	Medieval copper alloy harness fitting	FINDSPOT	Medieval
MKE66773	MKE66773	Medieval copper alloy food serving container	FINDSPOT	Medieval
MKE66774	MKE66774	Medieval copper alloy thimble	FINDSPOT	Medieval
MKE66776	MKE66776	Medieval copper alloy jetton	FINDSPOT	Medieval
MKE66778	MKE66778	Bronze Age socketed axehead	FINDSPOT	Late Bronze Age
MKE66779	MKE66779	Roman copper alloy figurine	FINDSPOT	Roman to Early Medieval or Anglo-Saxon
MKE66795	MKE66795	lead coin	FINDSPOT	Unknown
MKE27851	TQ 77 SW 1014	GORE GREEN FARM BARN	SITE; TIMBER FRAMED BARN; AISLED BARN	Medieval to Post Medieval
MKE27775	TQ 77 SW 1005	BARN AT HIGHAM HALL	BARN; BARN; BARN	Post Medieval to Modern
MKE27774	TQ 77 SW 1011	WHITE HOUSE FARM BARN	SITE; BARN	Medieval to Post Medieval

MKE27748	TQ 77 SW 1007	THE OBELISK	SITE; BOUNDARY MARKER; OBELISK; COAT OF ARMS	Post Medieval to Modern
MKE27693	TQ 77 SW 1006	GARDEN WALLS TO HIGHAM HALL	SITE; GARDEN WALL; BEE BOLE	Medieval to Post Medieval
MKE27692	TQ 77 SW 1008	HIGHAM HALL	SITE; HOUSE; HOUSE; HOUSE	Medieval to Modern
MKE27691	TQ 77 SW 1039	WHITE HOUSE FARM	SITE; HOUSE; HOUSE; FARM	Medieval to Post Medieval
MKE67105	MKE67105	Medieval copper alloy vessel	FINDSPOT	Medieval
MKE67106	MKE67106	Post Medieval copper alloy bell	FINDSPOT	Post Medieval
MKE67107	MKE67107	Medieval lead seal matrix	FINDSPOT	Medieval
MKE66616	MKE66616	Iron Age copper alloy brooch	FINDSPOT	Early Iron Age
MKE27855	TQ 77 SW 1016	DAIRY FARM HOUSE	SITE; FARMHOUSE; FARMHOUSE	Post Medieval to Modern
MKE66614	MKE66614	Bronze Age copper alloy socketed axehead	FINDSPOT	Middle Bronze Age to Early Iron Age
MKE67108	MKE67108	Medieval lead seal matrix	FINDSPOT	Medieval

MKE67109	MKE67109	Early Medieval copper alloy stirrup	FINDSPOT	Early Medieval or Anglo-Saxon to Medieval
MKE27685	TQ 77 SW 1021	GORE GREEN FARMHOUSE	SITE; TIMBER FRAMED HOUSE; FARMHOUSE	Medieval to Post Medieval
MKE2675	TQ 77 SW 11	Bronze Age cist burial, Higham Marshes	CROUCHED INHUMATION; CIST; SITE	Bronze Age
MKE2674	TQ 77 SW 10	Roman pottery works around Higham	POTTERY WORKS	Roman
MKE2673	TQ 77 SW 9	Coin of Allectus found at Higham	FINDSPOT	Roman
MKE2666	TQ 77 SW 23	Late Bronze Age founders hoard, Romano-British cremations, early medieval cemetery	Hoard; VASE; CREMATION; CINERARY URN; HUMAN REMAINS; CEMETERY	Early Bronze Age to Early Medieval or Anglo-Saxon
MKE17154	TQ 77 SW 74	Higham station lime kiln	LIME KILN	Post Medieval
MKE71714	MKE71714	Iron Age copper alloy coin	FINDSPOT	Middle Iron Age to Late Iron Age
MKE66612	MKE66612	Medieval lead seal matrix	FINDSPOT	Medieval
MKE66611	MKE66611	Medieval lead seal matrix	FINDSPOT	Medieval
MKE66610	MKE66610	Roman copper alloy ear scoop	FINDSPOT	Roman to Early Medieval or Anglo-Saxon

MKE66613	MKE66613	Early Medieval copper alloy buckle	FINDSPOT	Early Medieval or Anglo-Saxon
MKE66838	MKE66838	Iron Age copper alloy coin	FINDSPOT	Late Iron Age
MKE66845	MKE66845	Medieval silver coin	FINDSPOT	Medieval
MKE79629	MKE79629	Medieval copper alloy buckle	FINDSPOT	Medieval to Post Medieval
MKE79630	MKE79630	copper alloy brooch	FINDSPOT	Medieval
MKE79631	MKE79631	Post Medieval copper alloy ear ring	FINDSPOT	Post Medieval
MKE79632	MKE79632	Medieval lead token	FINDSPOT	Medieval to Post Medieval
MKE79633	MKE79633	Early Medieval lead gaming piece	FINDSPOT	Early Medieval or Anglo-Saxon
MKE79634	MKE79634	Roman copper alloy brooch	FINDSPOT	Roman
MKE79635	MKE79635	Medieval copper alloy buckle	FINDSPOT	Medieval
MKE79636	MKE79636	Roman copper alloy brooch	FINDSPOT	Roman
MKE79637	MKE79637	copper alloy mount	FINDSPOT	Post Medieval
MKE79638	MKE79638	silver coin	FINDSPOT	Medieval

MKE79639	MKE79639	copper alloy coin	FINDSPOT	Roman
MKE79640	MKE79640	copper alloy coin	FINDSPOT	Roman to Early Medieval or Anglo-Saxon
MKE79641	MKE79641	silver coin	FINDSPOT	Roman
MKE79642	MKE79642	Roman copper alloy coin	FINDSPOT	Roman
MKE79649	MKE79649	Roman copper alloy coin	FINDSPOT	Roman
MKE79650	MKE79650	Post Medieval silver coin	FINDSPOT	Post Medieval
MKE66889	MKE66889	Medieval silver coin	FINDSPOT	Medieval
MKE66940	MKE66940	Medieval copper alloy bell	FINDSPOT	Medieval to Post Medieval
MKE67102	MKE67102	Medieval copper alloy harness	FINDSPOT	Medieval
MKE67103	MKE67103	Early Medieval copper alloy strap end	FINDSPOT	Early Medieval or Anglo-Saxon
MKE67104	MKE67104	Early Medieval copper alloy buckle	FINDSPOT	Early Medieval or Anglo-Saxon to Medieval
MKE67349	MKE67349	Iron Age copper alloy coin	FINDSPOT	Iron Age
MKE67350	MKE67350	Iron Age copper alloy coin	FINDSPOT	Iron Age

MKE79628	MKE79628	Post Medieval copper alloy buckle	FINDSPOT	Post Medieval
MKE83442	MKE83442	Gore Green Farm	FARMSTEAD	Post Medieval
MKE8354	TQ 77 SW 88	Higham station	RAILWAY STATION	Post Medieval to Modern
MKE79627	MKE79627	Medieval copper alloy buckle	FINDSPOT	Medieval
MKE67368	MKE67368	Iron Age copper alloy coin	FINDSPOT	Iron Age
MKE79626	MKE79626	Roman copper alloy coin	FINDSPOT	Roman to Early Medieval or Anglo-Saxon
MKE71713	MKE71713	Iron Age copper alloy coin	FINDSPOT	Middle Iron Age to Late Iron Age
MKE77606	TQ 77 SW 185	George V pillar box, Lower Higham XPO	PILLAR BOX	Modern
MKE79619	MKE79619	Roman lead alloy ingot	FINDSPOT	Late Iron Age to Medieval
MKE79620	MKE79620	Roman lead alloy spindle whorl	FINDSPOT	Roman to Post Medieval
MKE79621	MKE79621	copper alloy finger ring	FINDSPOT	Medieval to Post Medieval
MKE79623	MKE79623	Medieval copper alloy buckle	FINDSPOT	Medieval
MKE83222	MKE83222	King's Farm	FARMSTEAD	Post Medieval

MKE83229	MKE83229	Gore Green Farm	FARMSTEAD	Post Medieval
MKE83230	MKE83230	Dairy Farm	FARMSTEAD	Post Medieval
MKE83231	MKE83231	Farmstead at Cuckold's Corner	FARMSTEAD	Post Medieval
MKE83232	MKE83232	Higham Hall	FARMSTEAD	Post Medieval
MKE83233	MKE83233	Hill Farm (Highamhill)	FARMSTEAD	Post Medieval
MKE83234	MKE83234	White House Farm	FARMSTEAD	Post Medieval
MKE67358	MKE67358	Iron Age copper alloy coin	FINDSPOT	Iron Age
MKE67363	MKE67363	Iron Age copper alloy coin	FINDSPOT	Iron Age
MKE9492	TQ 77 SW 45	Cropmark of pit(s)	PIT	Unknown
MKE110583	MKE110583	Post Medieval copper alloy coin	FINDSPOT	Post Medieval
MKE110608	MKE110608	Iron Age copper alloy brooch	FINDSPOT	Middle Iron Age
MKE83235	MKE83235	Outfarm south west of White House Farm	FARMSTEAD	Post Medieval
MKE88514	MKE88514	Outfarm west of Higham Hall	FARMSTEAD	Post Medieval
MKE9456	TQ 77 SW 93	Anglo-Saxon bucket, Higham	FINDSPOT	Early Medieval or Anglo-Saxon

MKE110593	MKE110593	Roman copper alloy coin	FINDSPOT	Roman
MKE110601	MKE110601	Iron Age copper alloy brooch	FINDSPOT	Middle Iron Age
MKE110582	MKE110582	Medieval silver coin	FINDSPOT	Medieval
MKE72092	MKE72092	copper alloy brooch	FINDSPOT	Roman
MKE95542	MKE95542	Post Medieval Silver coin	FINDSPOT	Post Medieval
MKE95543	MKE95543	Medieval Copper alloy buckle	FINDSPOT	Medieval
MKE95545	MKE95545	Medieval Copper alloy buckle	FINDSPOT	Medieval to Post Medieval
MKE95618	MKE95618	Post Medieval Copper alloy coin weight	FINDSPOT	Medieval to Post Medieval
MKE95541	MKE95541	Post Medieval Copper alloy button	FINDSPOT	Medieval to Post Medieval
MKE110549	MKE110549	Medieval copper alloy harness mount	FINDSPOT	Medieval
MKE113296	MKE113296	Post Medieval copper alloy coin	FINDSPOT	Post Medieval
MKE113297	MKE113297	Iron Age silver coin	FINDSPOT	Late Iron Age
MKE110553	MKE110553	Post Medieval copper alloy whistle	FINDSPOT	Post Medieval
MKE110554	MKE110554	Roman copper alloy hair pin	FINDSPOT	Roman

MKE110555	MKE110555	Roman copper alloy pendant	FINDSPOT	Roman to Early Medieval or Anglo-Saxon
MKE110574	MKE110574	Neolithic flint knife	FINDSPOT	Early Neolithic to Late Bronze Age
MKE9493	TQ 77 SW 46	Occupation floor – cropmark	SETTLEMENT	Unknown
MKE95459	MKE95459	Copper alloy socketed axehead	FINDSPOT	Late Bronze Age
MWX20837	TQ 77 SW 96	Three Palaeolithic handaxes from Lower Higham	FINDSPOT	Lower Palaeolithic to Middle Palaeolithic
MKE114674	TQ 77 SW 1100	Two Second World War anti-tank blocks, Shorne	ANTI TANK BUOY	Modern
MKE120865	MKE120865	Roman Copper alloy Coin	FINDSPOT	Roman
MKE120882	MKE120882	Modern Silver Pendant	FINDSPOT	Unknown
MKE120885	MKE120885	Bronze Age Copper alloy Palstave	FINDSPOT	Middle Bronze Age to Late Bronze Age
MKE120886	MKE120886	Medieval Silver Coin	FINDSPOT	Medieval
MKE120915	MKE120915	Post Medieval Gold Finger Ring	FINDSPOT	Post Medieval
MKE113260	MKE113260	Post Medieval copper alloy coin	FINDSPOT	Post Medieval

MKE113263	MKE113263	Modern silver button	FINDSPOT	Post Medieval to Modern
MKE113290	MKE113290	Medieval silver coin	FINDSPOT	Medieval
MKE113295	MKE113295	Post Medieval copper alloy jetton	FINDSPOT	Post Medieval
MKE120917	MKE120917	Medieval Copper alloy Finger Ring	FINDSPOT	Medieval
MKE114673	TQ 77 SW 1100	Group of Second World War anti-tank blocks, Higham	ANTI TANK BUOY	Modern
MKE111943	TQ 77 SW 1099	National School, School Lane, Higham, Rochester, Medway	NATIONAL SCHOOL	Post Medieval
MKE1546	TQ 67 SE 20	Thames and Medway Canal	CANAL	Post Medieval to Modern
MKE44036	TQ 57 SE 277	NORTH KENT RAILWAY	RAILWAY	Post Medieval
MKE44047	TQ 77 SE 1314	HOO JUNCTION AND PORT VICTORIA RAILWAY	RAILWAY	Post Medieval
MKE2678	TQ 77 SW 14	Church of St Giles and the deserted medieval village of Merston?	DESERTED SETTLEMENT; CHURCH	Medieval
MKE43327	TQ 77 SW 176	System of enclosures aligned along a drove way running north-south	ENCLOSURE; POST HOLE?; TRACKWAY	Unknown

MKE122973	TQ 77 SW 1128	An area of medieval or post medieval ridge and furrow seen as earthworks in a field adjacent to the Thames and Medway canal	RIDGE AND FURROW?	Medieval to Post Medieval
MKE122974	TQ 77 SW 1129	Linear bank and ditch of uncertain date, possibly a former field boundary or plough headland	FIELD BOUNDARY?; PLOUGH HEADLAND	Medieval to Post Medieval
MKE122976	TQ 77 SW 1130	The earthwork remains of two parallel banks of uncertain date south of Beckley Hill	FIELD BOUNDARY?; BANK (EARTHWORK)	Early Neolithic to Modern
MKE122977	TQ 77 SW 1131	The earthwork remains of a probable Second World War bomb crater, Higham	BOMB CRATER?	Modern
MKE122982	TQ 77 SW 1134	Second World War allotment gardens seen to the north of Gore Green Farm	ALLOTMENT	Modern
MKE41696	TQ 77 SW 1049	Bull Lane Second World War searchlight site, Higham	SEARCHLIGHT BATTERY	Modern
MKE123051	TQ 77 SW 1150	Cropmark of a possible post medieval ditch or hollow way	HOLLOW WAY; DITCH	Post Medieval
MKE91153	TQ 77 SW 193	Cropmark of a double ring ditch, to the east of King's Farm	RING DITCH?; BARROW?	Late Neolithic to Early Iron Age



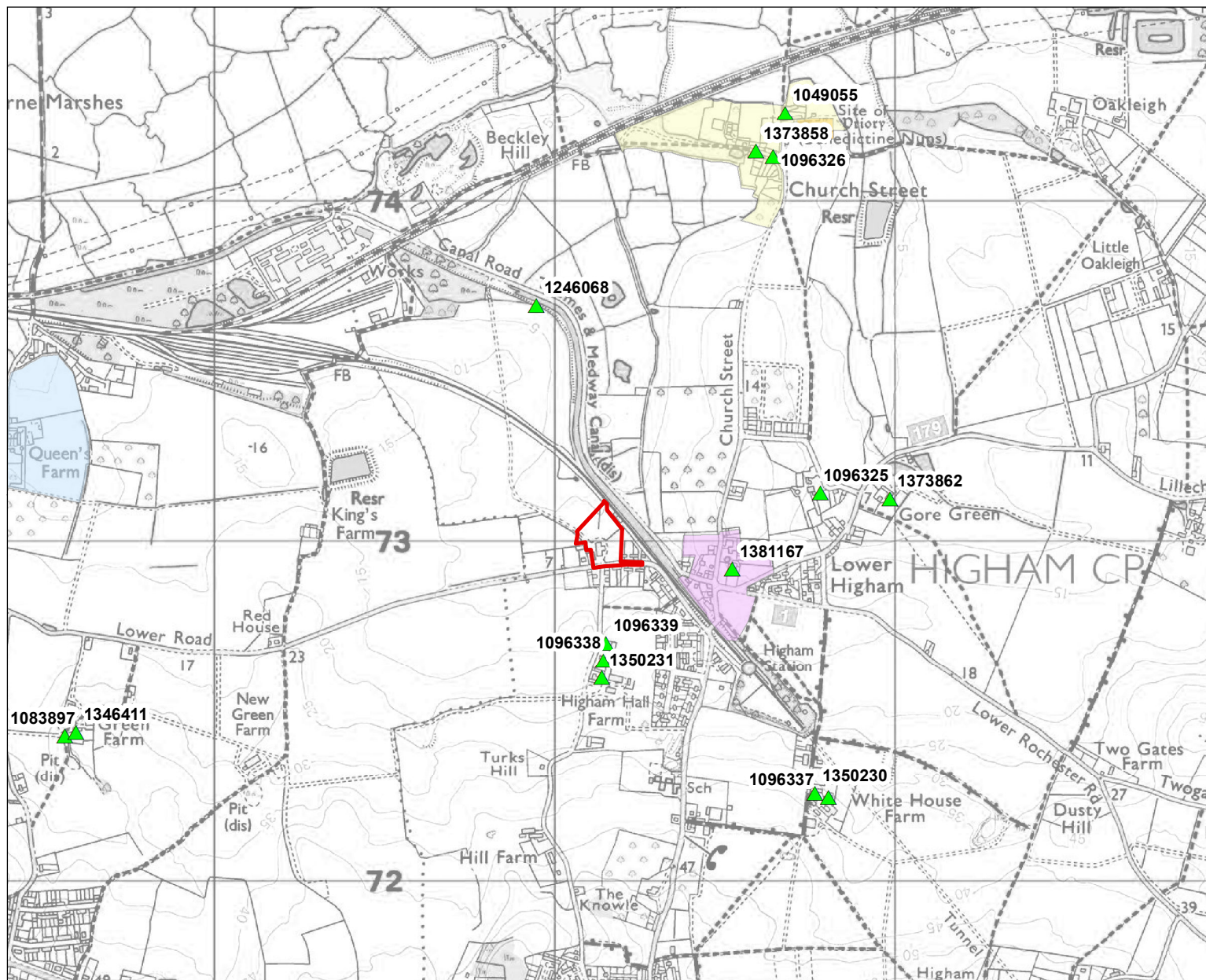
Historic England Data

Historic England Listed Buildings

List Entry	Name	Grade	Eastings	Northings



Appendix 2: Figures



KEY

- Site
- ▲ Grade I Listed Building
- ▲ Grade II Listed Building
- Church Street, Higham Conservation Area
- Lower Higham Conservation
- Queen's Farm, Shorne Conservation Area
- Scheduled Monument

Revisions:
First Issue- 01/07/2025 RW
Second Issue - 11/08/2025 JLH

Figure 1: Designated Heritage Assets

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:17,500 @ A3



KEY

- Site
- Study Area
- HER Event Point
- HER Event Line
- HER Event Polygon

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

Figure 2: Kent HER Event Assets

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

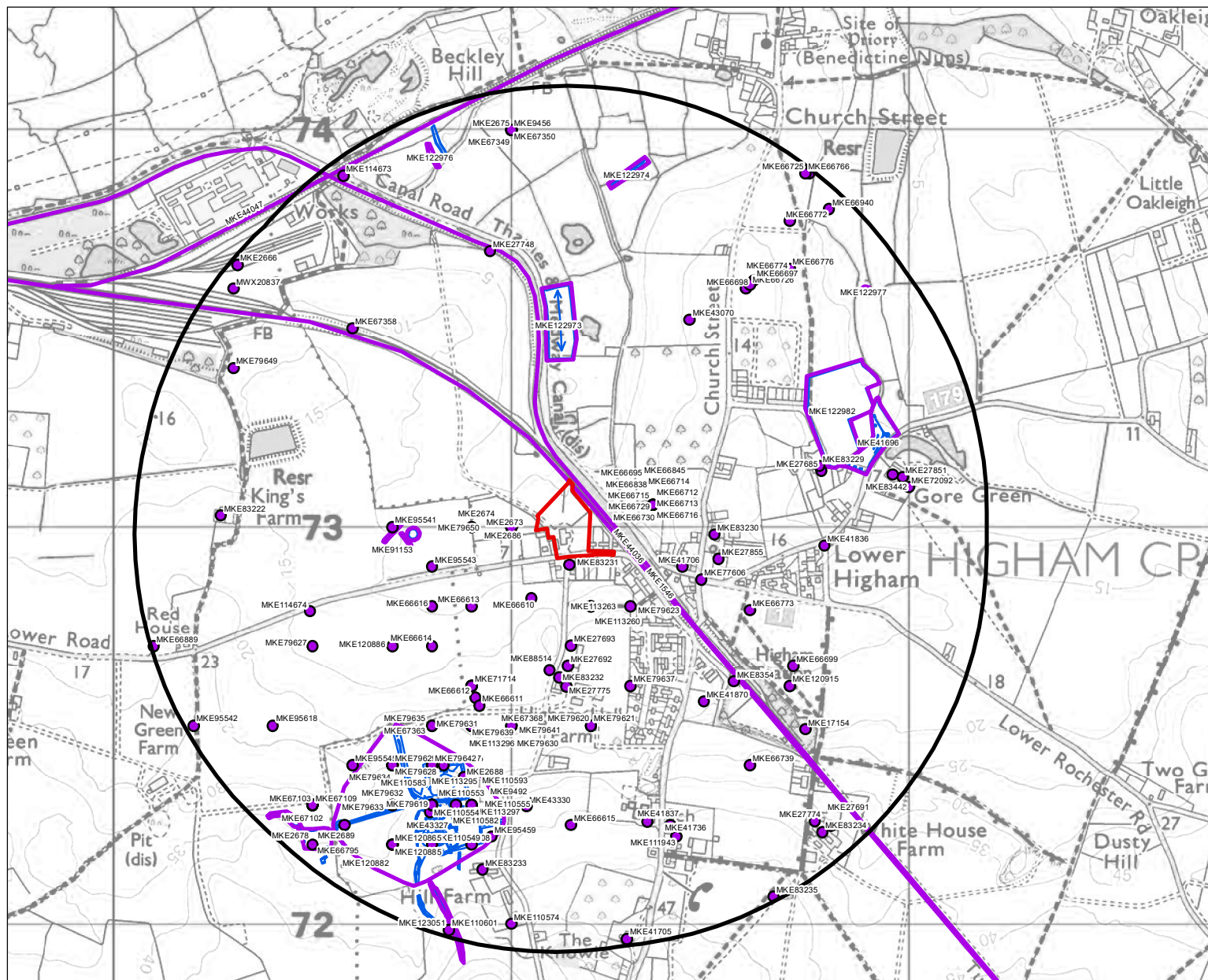
Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:15,000 @ A3

0 600 Meters





KEY

- Site
- Study
- HER Monument Point
- HER Monument Line
- HER Monument Polygon
- National Mapping Programme Line
- National Mapping Programme Polygon

Revisions:
First Issue- 01/07/2025 RW
Second Issue - 11/08/2025 JLH

Figure 3: Kent HER Monument Data

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/JLH Approved by: GST

Date: 11/08/2025

Scale: 1:15,000 @ A3

Appendix 3: Assessment Methodology

Assessment of significance

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 Outstanding Universal Value forms part of its significance.”²¹

Historic England's *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.²²

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*.²³ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²⁴

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 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.²⁵

²¹ MHCLG, *NPPF*, Annex 2.

²² Historic England, *GPA:2*.

²³ Historic England, *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.

²⁴ MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

²⁵ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

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

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁶

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

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁷

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.”²⁸

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.²⁹

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.

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.

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 factors other than visibility should also be considered, with Lindblom LJ stating at

²⁶ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

²⁷ MHCLG, *NPPF*, Annex 2.

²⁸ MHCLG, *NPPF*, Annex 2.

²⁹ Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

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.”³⁰

Levels of significance

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.

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 213 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 75 of the *NPPF*;³¹
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³² and

³⁰ Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

³¹ MHCLG, *NPPF*, para. 213 and fn. 75.

³² MHCLG, *NPPF*, para. 213.

- **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"*.³³

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

Assessment of harm

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.

In accordance with 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"*,³⁴ and

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

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."³⁵

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, and upper end of the less than substantial harm spectrum/scale.

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 whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. 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"*.³⁶

³³ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

³⁴ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁵ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁶ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

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*”.³⁷ 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.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.³⁸ Of particular relevance is the checklist given on page 13 of *GPA:3*.³⁹

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation...”⁴⁰

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

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”.⁴¹

Additionally, 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. This point has been clarified in the Court of Appeal.⁴²

Benefits

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

As detailed further in **Appendix 5**, the *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴³

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.⁴⁴

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

³⁷ Historic England, *GPA:2*, p. 9.

³⁸ Historic England, *GPA:3*, p. 8.

³⁹ Historic England, *GPA:3*, p. 13.

⁴⁰ Historic England, *GPA:3*, p. 4.

⁴¹ Historic England, *GPA 3*, p. 8.

⁴² *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴³ MHCLG, *NPPF*, paras. 214 and 215.

⁴⁴ Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); MHCLG, *NPPF*, paras. 214 and 216.

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.***⁴⁵

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.

⁴⁵ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 4: Legislative Framework

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.⁴⁶ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act 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.”⁴⁷

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.”⁴⁸

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 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.⁴⁹

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 of preserving or enhancing the character or appearance of that area.”⁵⁰

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.

⁴⁶ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁴⁷ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁴⁸ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁴⁹ Jones v Mordue [2015] EWCA Civ 1243.

⁵⁰ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

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.⁵¹

⁵¹ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 5: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

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.

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.

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 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. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- 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 strong 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, having particular regard to key policies for directing development to sustainable locations,*

making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”⁵²

However, it is important to note that footnote 7 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 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, 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 footnote 75); and areas at risk of flooding or coastal change.”⁵³ (our emphasis)

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.

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

⁵² MHCLG, NPPF, para. 11.

⁵³ MHCLG, NPPF, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing)."⁵⁴

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."⁵⁵

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."⁵⁶

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 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."⁵⁷

Paragraph 210 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***
- c. the desirability of new development making a positive contribution to local character and distinctiveness."***⁵⁸

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 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

⁵⁴ MHCLG, NPPF, Annex 2.

⁵⁵ MHCLG, NPPF, Annex 2.

⁵⁶ MHCLG, NPPF, Annex 2.

⁵⁷ MHCLG, NPPF, para. 208.

⁵⁸ MHCLG, NPPF, para. 210.

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.”⁵⁹

“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.”⁶⁰***

Section b) of paragraph 213, which describes assets of the highest significance, also includes footnote 75 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 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.”⁶¹***

Paragraph 215 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.”⁶²

⁵⁹ MHCLG, NPPF, para. 212.

⁶⁰ MHCLG, NPPF, para. 213.

⁶¹ MHCLG, NPPF, para. 214.

⁶² MHCLG, NPPF, para. 215.

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 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.”⁶³

Paragraph 220 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” 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 214 or less than substantial harm under paragraph 215, 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.”⁶⁴ (our emphasis)

With regards to non-designated heritage assets, paragraph 216 of NPPF states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁵

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

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & 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.

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.

⁶³ MHCLG, NPPF, para 219.

⁶⁴ MHCLG, NPPF, para. 220.

⁶⁵ MHCLG, NPPF, para. 216.

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 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.”⁶⁶

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.”⁶⁷ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁶⁸

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁶⁹

It goes on to state that:

“Well-designed places and buildings are influenced positively by:

⁶⁶ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

⁶⁷ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁶⁸ MHCLG, NDG, para. 46.

⁶⁹ MHCLG, NDG, para. 47.

- *the history and heritage of the site, its surroundings and the wider area, including cultural influences;*
- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.*

*Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."*⁷⁰

⁷⁰ MHCLG, NDG, paras. 48–49.

Appendix 6: Relevant Development Plan Policies

Applications for Planning Permission within Higham are currently considered against the policy and guidance set out within the Gravesham Local Plan Core Strategy (adopted September 2014) and the Saved Policies from the Gravesham Local Plan First Review (1994) which was largely replaced by the 2014 Local Plan.

The Core Strategy contains the following relevant policy:

“Policy CS20: Heritage and the Historic Environment

The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough’s heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough.

These include:

- ***Gravesend Town Centre, its development as a heritage riverside town, and its***
- ***setting;***
- ***The Borough’s urban and rural conservation areas; and***
- ***Surviving built features and archaeology relating to the Borough’s maritime, military, industrial and transport history.***

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset’s conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.”

The Saved Policies from the Gravesham Local Plan First Review include the following relevant policies:

“Policy TC3 Development Affecting Conservation Areas

The Borough Council will adopt the following approach to applications for development within or affecting conservation areas:-

- (i) ***Where development is acceptable in relation to other policies in this Plan, it will be carefully judged for its impact and will be expected to***

make a positive contribution to the conservation area. The Borough Council will expect applications to contain sufficient details to enable the impact of the proposal upon the conservation area to be assessed.

- (ii) *The demolition of unlisted buildings will be resisted unless the Borough Council is satisfied that the existing building is harmful to the conservation area and that the proposals for redevelopment or other use of the site will be beneficial. To this end, the Borough Council may, in suitable cases, require an agreement for the replacement of the building or other suitable treatment of the site, prior to the granting of conservation area consent for demolition."*

archaeological investigation and recording of, by an approved archaeological body to take place in advance of or during development. The specification and programme of work for the archaeological investigation, including its relationship to the programme of development are to be submitted to and approved by the Borough Council. In order to determine a planning application the Borough Council may require the developer to provide additional information, in the form of an assessment of the archaeological or historic importance of the site in question and the likely impact of development. In certain cases, such an assessment may involve an evaluation excavation. Planning permission may be refused without adequate assessment of the archaeological implications."

"Policy TC7 Other Archaeological Sites

Throughout the Borough Plan Review area, development on important archaeological sites will not normally be permitted. On archaeological sites where permanent preservation is not warranted, applications will normally be refused unless arrangements have been made by the developer to ensure that time and resources are available to allow satisfactory



Appendix 7: Designation Descriptions

DAIRY FARM HOUSE

Listed on the National Heritage List for England. Search over 400,000 listed places (<https://historicengland.org.uk/listing/the-list/>)

Official list entry

Heritage Category:**Listed Building**

Grade:**II**

List Entry Number:**1381167**

Date first listed:**28-Jul-2000**

List Entry Name:**DAIRY FARM HOUSE**

Statutory Address 1:**DAIRY FARM HOUSE, CHURCH STREET**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

Understanding list entries

(<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

Corrections and minor amendments

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **DAIRY FARM HOUSE, CHURCH STREET**

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

County: **Kent**

District: **Gravesham (District Authority)**

Parish: **Higham**

National Grid Reference: **TQ 71522 72919**

Details

HIGHAM

TQ 77 SW CHURCH STREET 10/6/10010 Dairy Farm House 28-JUL-00

II

Farmhouse. Late C17 or early C18, refenestrated in original openings and porch and small east extension added in late C19 or early C20. Built of red brick in Flemish bond with steeply pitched hipped tiled roof with two end brick chimneystacks. Doublefronted plan. Two storeys and attics: 5 windows to original part, one storey one window to addition. Front elevation has moulded rubbed brick eaves course with half brick projecting full height piers at either end. Two tiled gabled dormers with rendered cheeks and 3 over 6 glazing bars with horns. Other floors have 6 over 6 sash windows with horns with rubbed brick voussoirs and rendered and painted cills. Central single panelled raised and fielded front door with central entrance portico, square piers and moulded cornice, rendered and painted. East extension is single storied of brick with hipped tiled roof, 6 Over 6 glazing bar sash with horns to

front and double sash without glazing bars but with horn to east side. Rear extensions housing domestic services. INTERIOR: Window shutters to ground floor rooms. Three timber panelled rooms. Fireplaces to all rooms with two ground floor fireplaces have built in cupboards. Early panelled doors and joinery details and narrow service stairs from kitchen to upper floor. Bell system with wires leading to the kitchen survives.

Listing NGR: TQ7152272919

Legacy

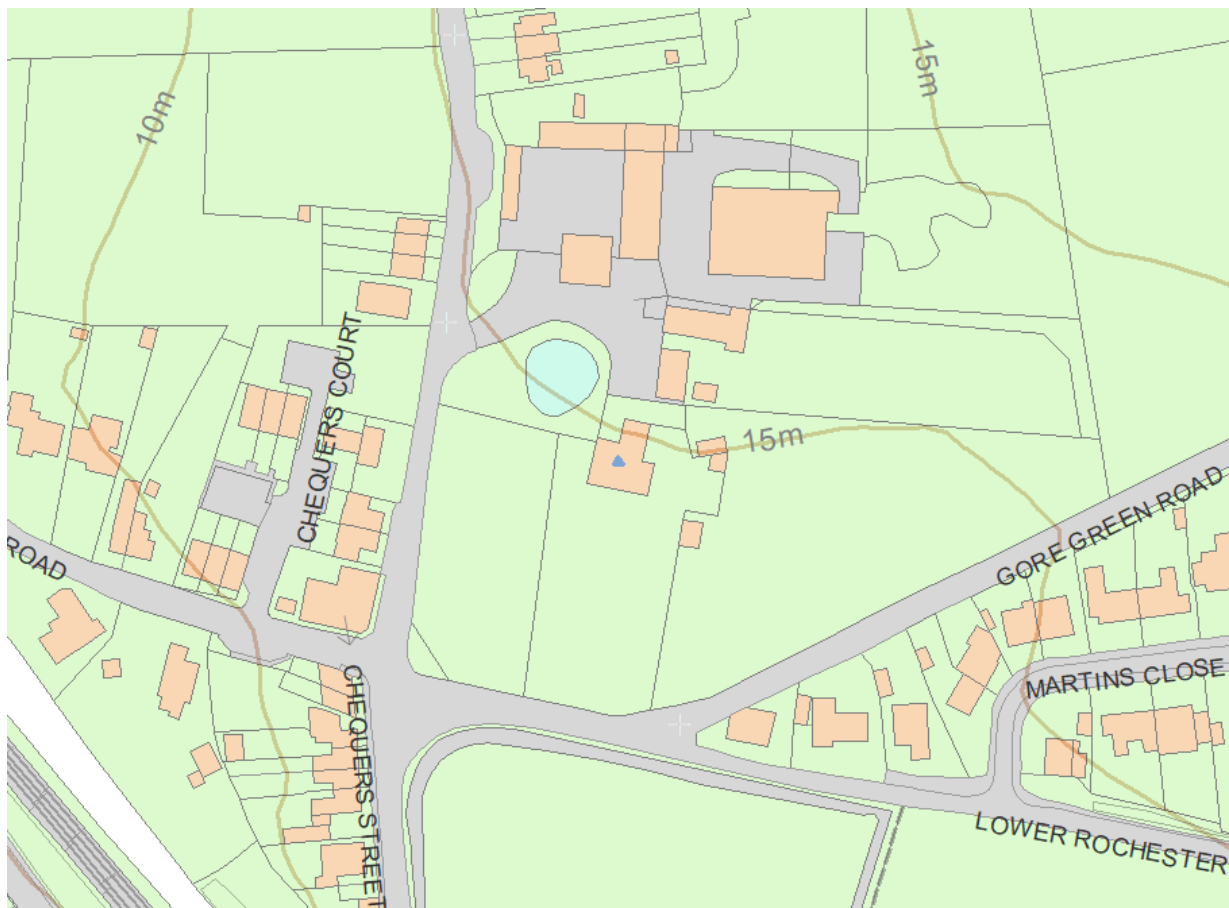
The contents of this record have been generated from a legacy data system.

Legacy System number:**481527**

Legacy System:**LBS**

Legal

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



Map

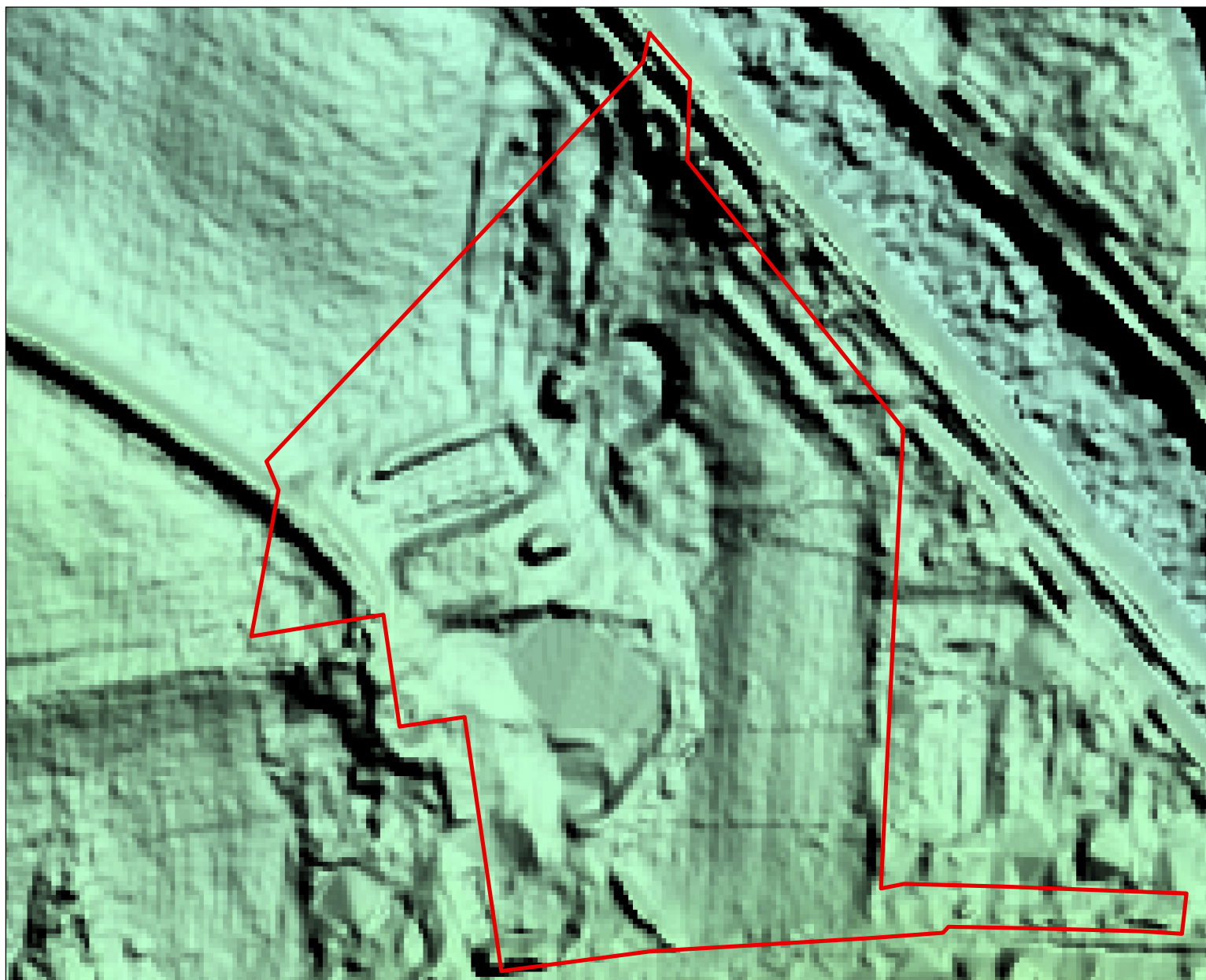
This map is for quick reference purposes only and may not be to scale. This copy shows the entry on 14-Jul-2025 at 07:30:52.

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AC0000815036. All rights reserved. Ordnance Survey
Licence number 100024900. © British Crown and SeaZone
Solutions Limited 2025. All rights reserved. Licence number
102006.006.

End of official list entry



Appendix 8: LiDAR Data



KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 90 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

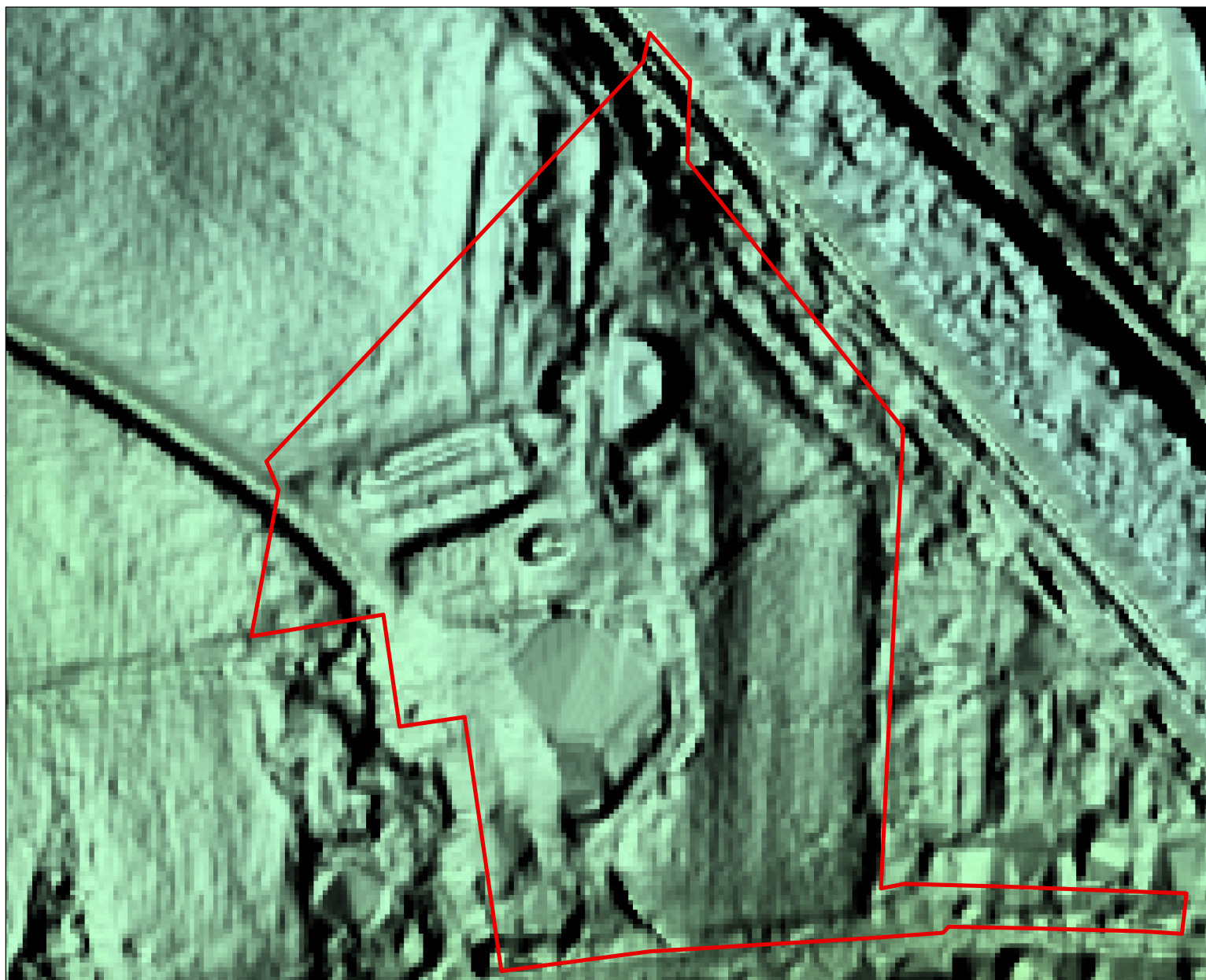
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Date: 11/08/2025

Scale: 1:1,250 @ A3

0 50 Meters





KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 90 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

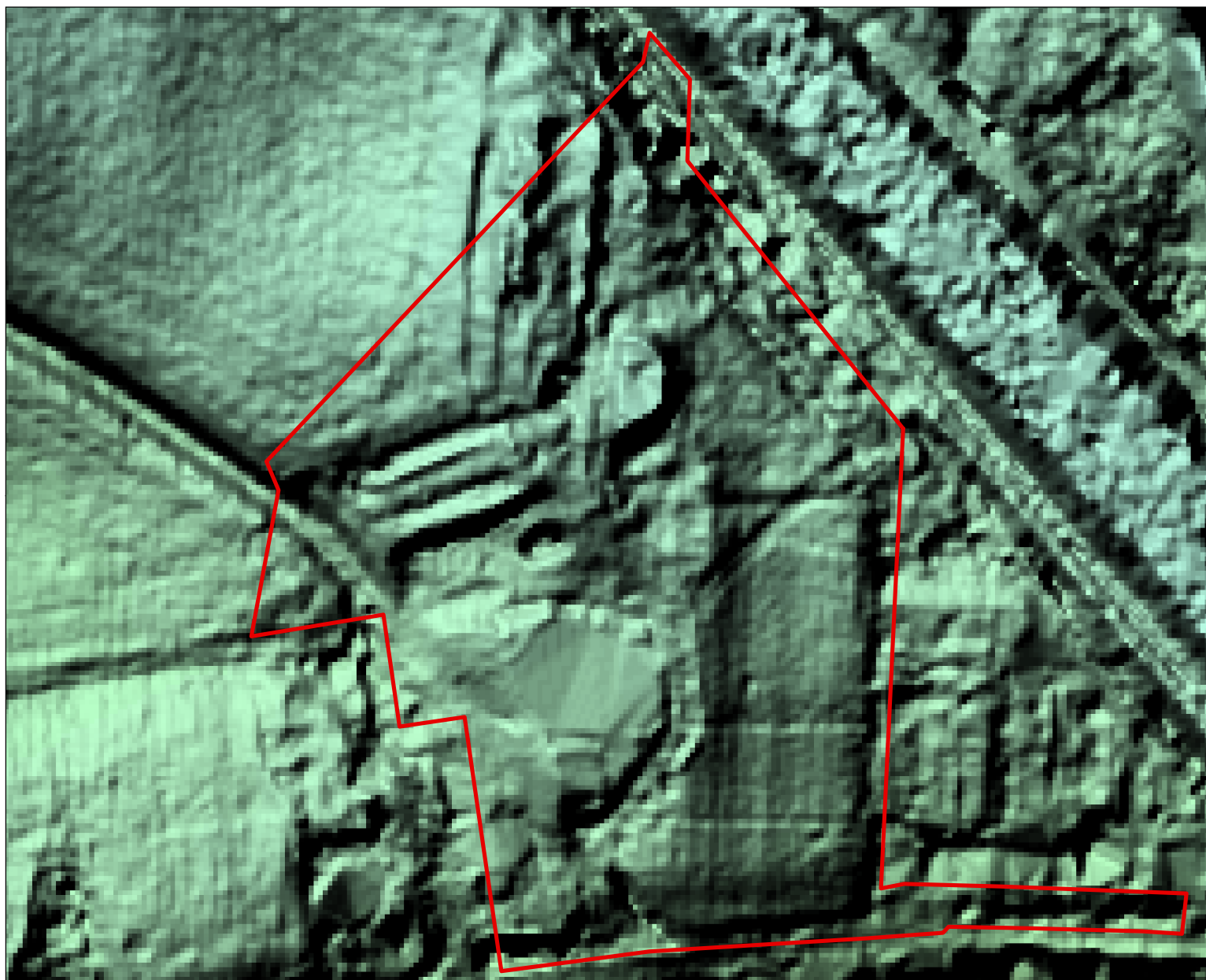
Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3

0 50 Meters





KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 135 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

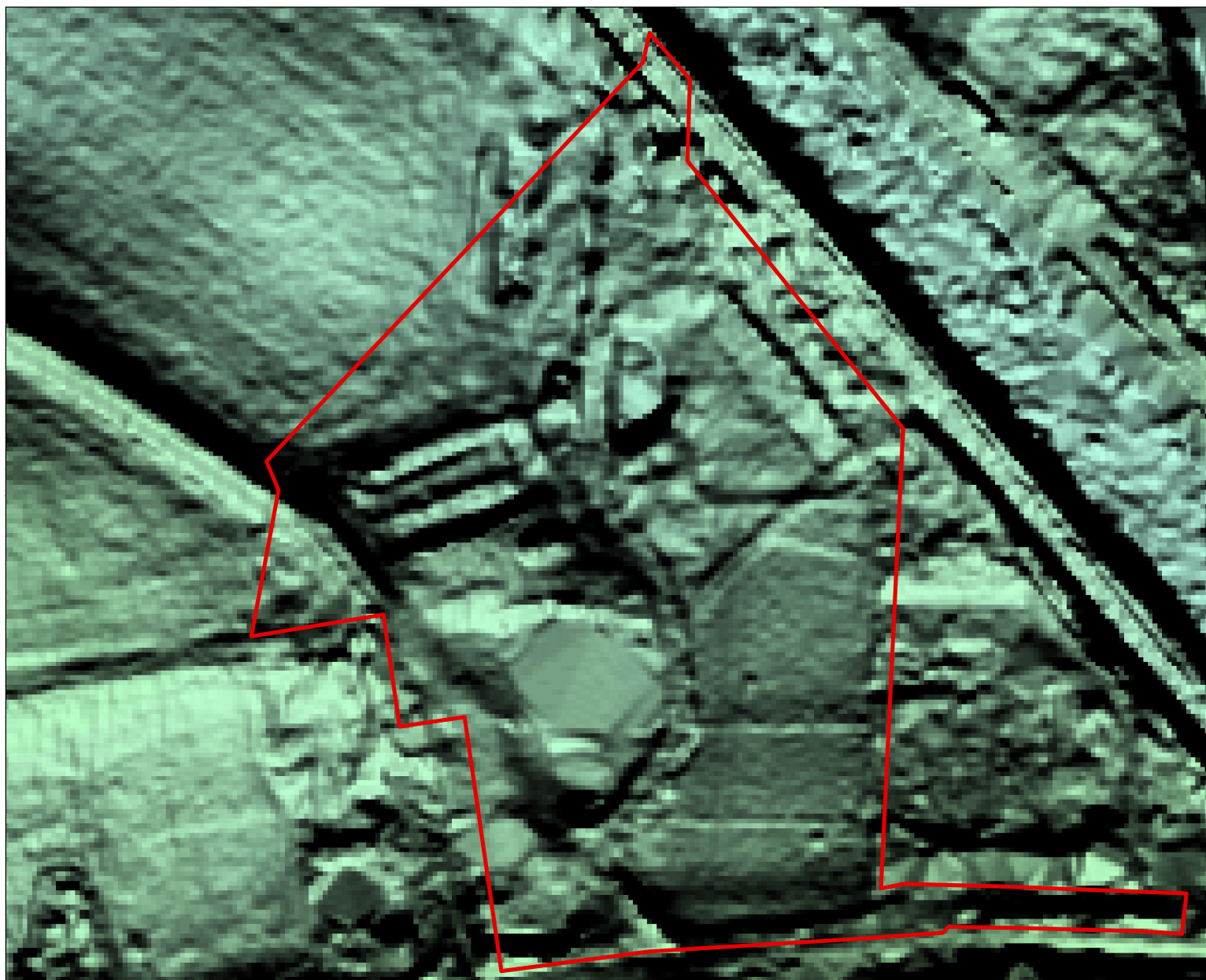
Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3

0 50 Meters





KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 180 degree interval

Land off Chalk Road, Lower Higham

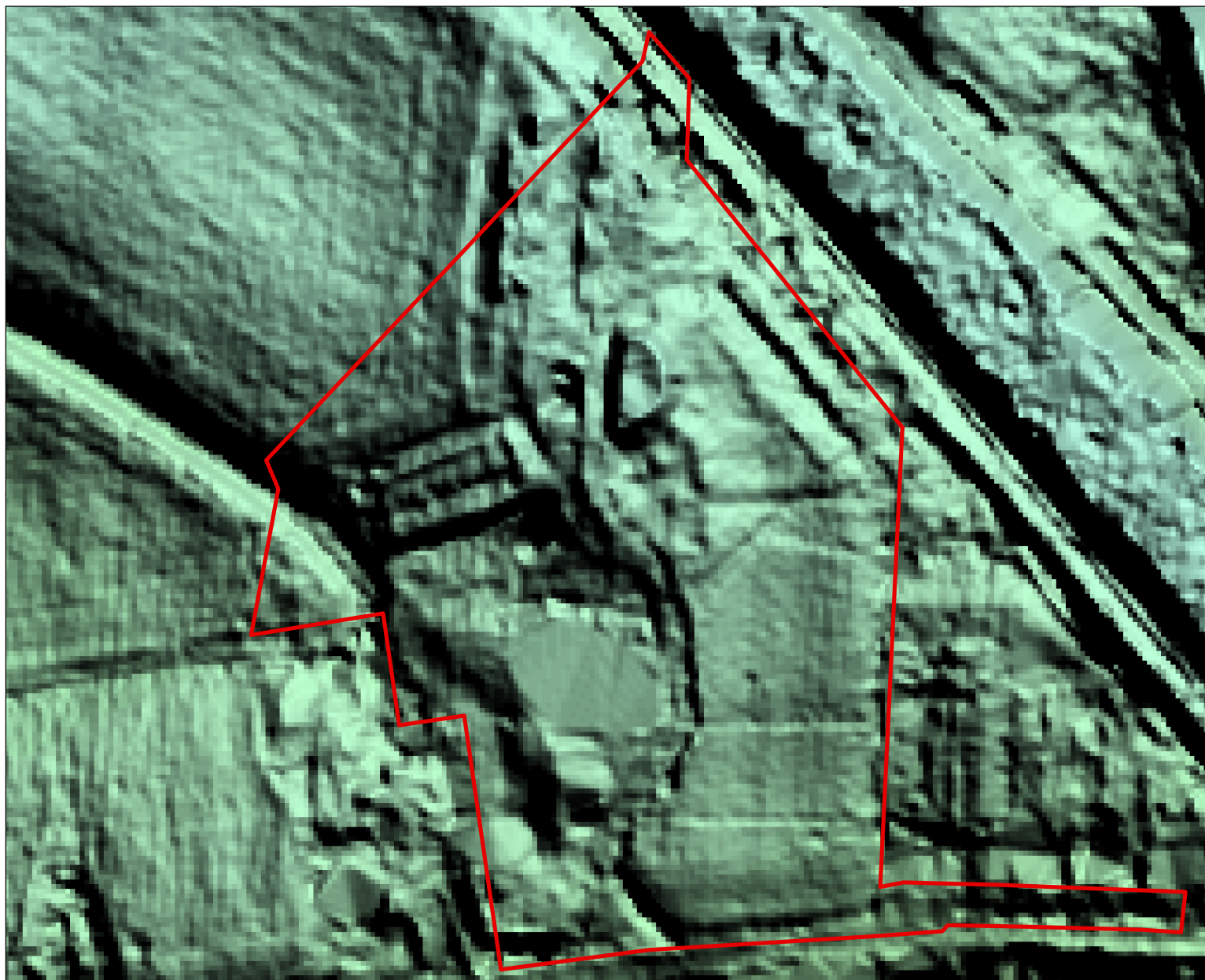
Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3



KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 225 degree interval

Land off Chalk Road, Lower Higham

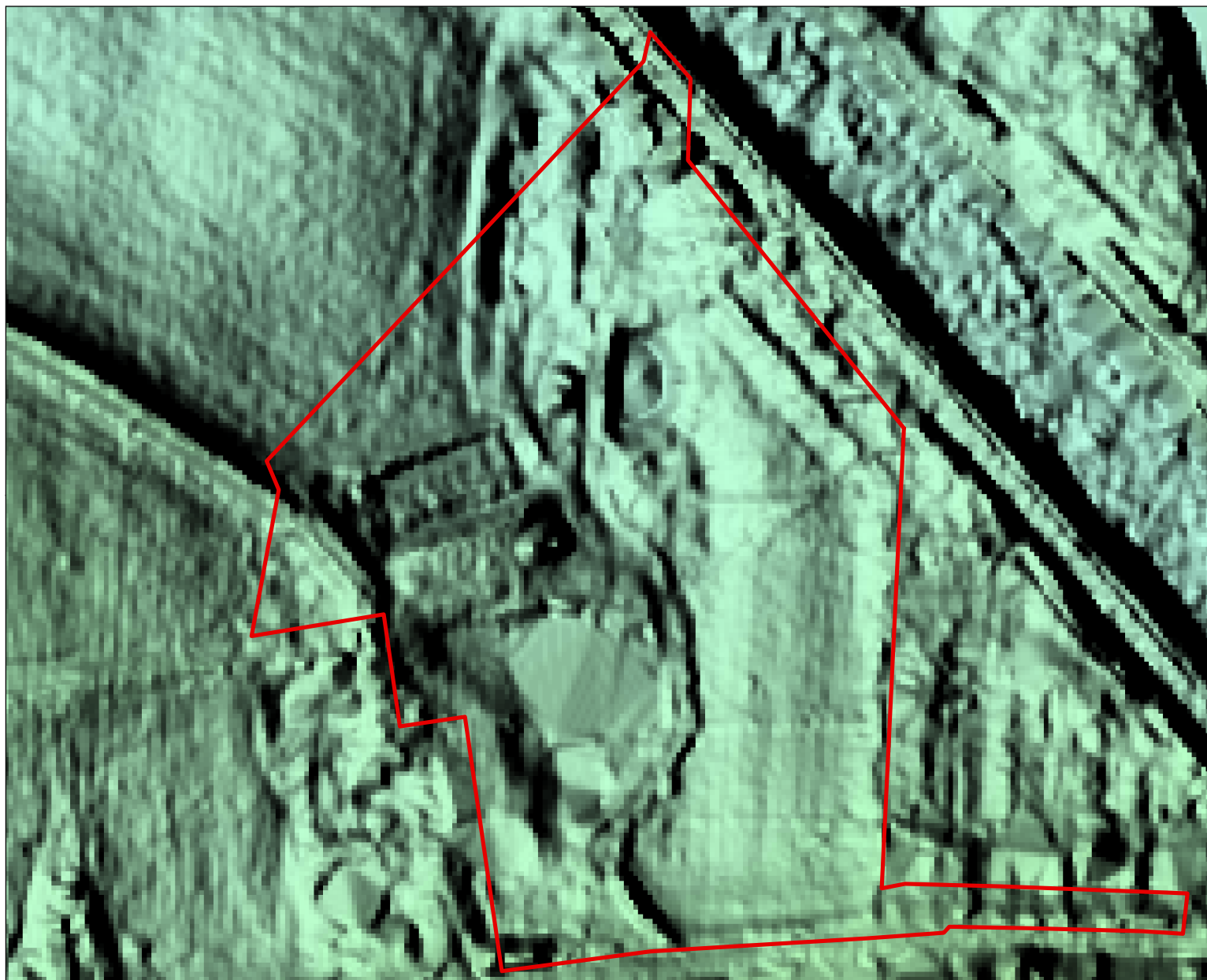
Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3



KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 270 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3



KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 315 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3

0 50 Meters





KEY

Site

Revisions:
First Issue- 01/07/2025 RW
Second Issue- 11/08/2025 JLH

LiDAR 360 degree interval

Land off Chalk Road, Lower Higham

Client: Richborough

DRWG No: P25-0237 Sheet No: - REV: -

Drawn by: RW/ JLH Approved by: GST

Date: 11/08/2025

Scale: 1:1,250 @ A3



Appendix 9: Geophysical Survey Report



GEOPHYSICAL SURVEY REPORT

Land off Chalk Road, Higham, Kent

Client

Pegasus Group

For

Richborough Ltd

Survey Report

21349

OASIS Ref. No.

Sumogeop1-532775

Date

01 July 2025



Survey Report 21349: Land off Chalk Road, Higham, Kent

Survey dates	02 April 2025
Field co-ordinator	Robert Knight BA MA
Field Team	Simon Lobel BSc
Report Date	01 July 2025
CAD Illustrations	Rebecca Fradgley BSc (Hons) ACIfA
Report Author	Rebecca Fradgley BSc (Hons) ACIfA
Project Manager	Rebecca Fradgley BSc (Hons) ACIfA
Report approved	Dr John Gater BSc DSc(Hon) MCIfA FSA

SUMO GeoSurveys
Suite1
Deer Park Business Centre
Woollas Hill
Eckington
Pershore
Worcestershire
WR10 3DN
T: 01684 592266
www.sumoservices.com
geophysics@sumoservices.com

SUMO GeoSurveys is a trading name of SUMO Geophysics Ltd.

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7	DATA APPRAISAL & CONFIDENCE ASSESSMENT	5
8	CONCLUSION	5
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Figure 05	NTS	Greyscale Plots / Interpretation / 1892-1914 Ordnance Survey Map / 2022 Aerial Image
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2 LIST OF APPENDICES

Appendix A	Technical Information: Magnetometer Survey Methods, Processing and Presentation
Appendix B	Technical Information: Magnetic Theory
Appendix C	OASIS Data Collection Sheet
Appendix D	Data Management Plan & Archive Selection Strategy

3 SURVEY TECHNIQUE

- 3.1 Detailed magnetic survey (magnetometry) was chosen as the most efficient and effective method of locating the type of archaeological anomalies which might be expected at this site. All survey techniques followed the guidance set out by ClfA (2020) and the European Archaeology Council (EAC) (2016).

Bartington Cart System Traverse Interval 1.0m Sample Interval 0.125m

The only processes performed on data are the following unless specifically stated otherwise:

Zero Mean Traverse	This process sets the background mean of each traverse within each grid to zero. The operation removes instrument striping effects and edge discontinuities over the whole of the data set.
-----------------------	---

4 EXECUTIVE SUMMARY OF RESULTS

- 4.1 A detailed magnetometer survey was conducted over approximately 0.9 hectares of land at Higham and it has not identified any anomalies of definite archaeological interest. A tentative sub-circular trend is of uncertain origin. Strong magnetic disturbance associated with former buildings plus made ground or landscaping is mapped in the results, along with the line of an existing fence.

5 INTRODUCTION

- 5.1 **SUMO GeoSurveys** was commissioned to undertake a geophysical survey of an area outlined for development. This survey forms part of an archaeological investigation being undertaken by **Pegasus Group** on behalf of **Richborough Ltd.**

5.2 Site Details

NGR / Postcode	TQ 71167 73010 / ME3 7JY
Location	The survey area lies c.5km northwest of Rochester, Kent and is located approximately 1.25km north of Higham. Chalk Road bounds the site to the south, with a railway line to the east and open fields to the north.
HER	Kent HER
OASIS Ref. No.	Sumogeop1-532775
District	Gravesham
Parish	Higham
Topography	Flat
Land Use	Pasture
Geology (BGS 2025)	Bedrock: Thanet Formation - sand, silt and clay. Superficial: No superficial deposits are recorded across the majority of the site. Head deposits of clay, silt, sand and gravel are present across the northern extent.
Soils (CU 2025)	Soilscape 6: freely draining slightly acid loamy soils.
Survey Methods	Magnetometer survey (fluxgate gradiometer)
Study Area	0.9 ha

5.3 *Archaeological Background*

- 5.3.1 A number of finds of prehistoric, Romano-British, medieval and post-medieval date have been recorded in the surrounds of the site. Cropmarks were identified to the west of the site which potentially represent a double ring ditch of Late Neolithic to early Iron Age date. Medieval ridge and furrow has been recorded in the wider area (R. Ward, personal communication, March 31, 2025).

5.4 *Aims and Objectives*

- 5.4.1 To locate and characterise any anomalies of possible archaeological interest within the study area.

6 RESULTS

6.1 *The survey has been divided into seven survey areas (Areas 1-7).*

6.2 ***Probable / Possible Archaeology***

6.2.1 No magnetic responses have been recorded that could be interpreted as being of definite archaeological interest.

6.3 ***Uncertain***

6.3.1 A tentative sub-circular trend has been identified in Area 5 and it has been assigned to the category of *Uncertain*. It lacks the defined morphology of anomalies that would usually be interpreted as being of archaeological interest. The proximity of cropmarks potentially representing a ring ditch to the west of the site suggests an archaeological explanation cannot be entirely ruled out, however the response is most likely to be a result of agricultural or modern processes.

6.4 ***Field Boundary / Fenceline***

6.4.1 A strongly magnetic linear anomaly runs between Areas 6 and 7 and marks the line of a fence line existing within the site.

6.5 ***Ferrous / Magnetic Disturbance***

6.5.1 Strong magnetic disturbance is mapped across Area 1 and part of Area 3. It is indicative of made ground, with the disturbance in Area 1 partially corresponding with an area of disturbance / consolidation visible on aerial imagery (Fig. 05) where buildings were visible and have since been demolished.

6.5.2 Ferrous responses close to boundaries are due to adjacent fences and gates. Smaller scale ferrous anomalies ("iron spikes") are present throughout the data and are characteristic of small pieces of ferrous debris (or brick / tile) in the topsoil; they are commonly assigned a modern origin. Only the most prominent of these are highlighted on the interpretation diagram.

7 DATA APPRAISAL & CONFIDENCE ASSESSMENT

7.1 Historic England Table 4 (EH 2008) states that the typical magnetic response on the local soils / geology is variable. The results from this survey indicate the presence of a tentative sub-circular anomaly of uncertain origin, however large parts of the site are magnetically disturbed. This disturbance has the potential to mask weaker, more ephemeral, archaeological anomalies.

8 CONCLUSION

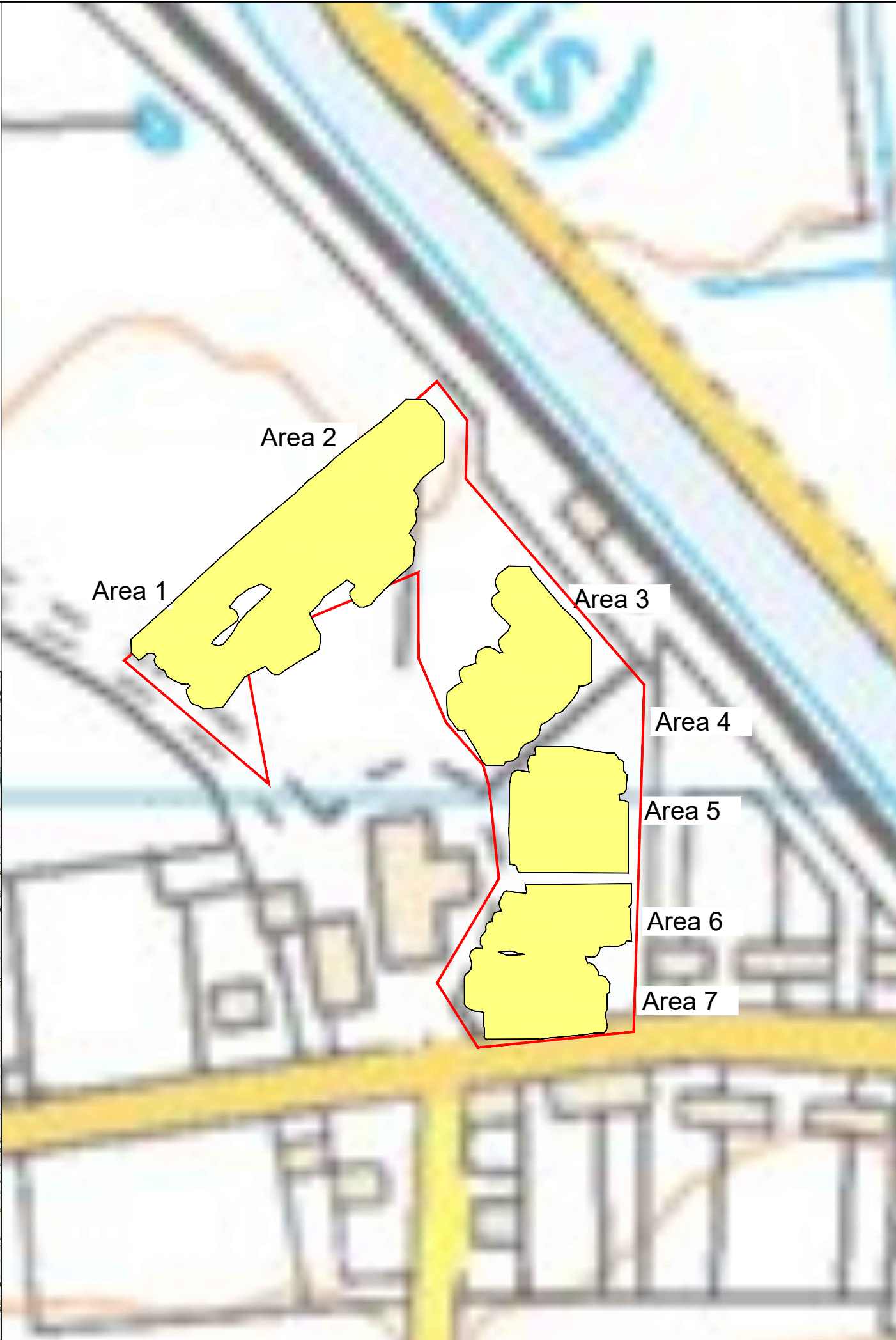
8.1 The magnetometer survey at Chalk Road, Higham, has not identified any anomalies of definite archaeological interest. A tentative sub-circular trend is mapped in the result and has an uncertain origin. Although thought unlikely, an archaeological explanation cannot be entirely ruled out given the proximity of a possible ring ditch identified to the west. An extant fence line is visible in the data, along with areas of strong magnetic disturbance, some associated with former buildings which are now demolished.

9 REFERENCES

- BGS 2025 *Geology of Britain Viewer*, British Geological Survey, website:
(<http://www.bgs.ac.uk/opengeoscience/home.html?Accordion1=1#maps>)
- ClfA 2020 *Standard and Guidance for Archaeological Geophysical Survey*. 2014 amended 2020. ClfA Guidance note. Chartered Institute for Archaeologists, Reading
https://www.archaeologists.net/sites/default/files/ClfAS%26GGeophysics_3.pdf
- CU 2025 *The Soils Guide*. www.landis.org.uk. Cranfield University, UK. website:
<http://mapapps2.bgs.ac.uk/ukso/home.html>
- EAC 2016 *EAC Guidelines for the Use of Geophysics in Archaeology*, European Archaeological Council, Guidelines 2.
- EH 2008 *Geophysical Survey in Archaeological Field Evaluation*. English Heritage, Swindon
(now withdrawn, but used for evaluating suitability of soil types)

10 ARCHIVE

- 10.1 The minimally processed data, data images, XY traces and a copy of this report are stored in **SUMO GeoSurveys'** digital archive, on an internal RAID configured NAS drive in the Midlands Office. These data are also backed up to the Cloud for off-site storage.
- 10.2 The Grey Literature will be archived with OASIS and the relevant HER within a period of 12 months.



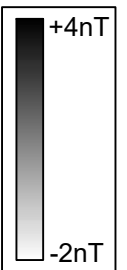
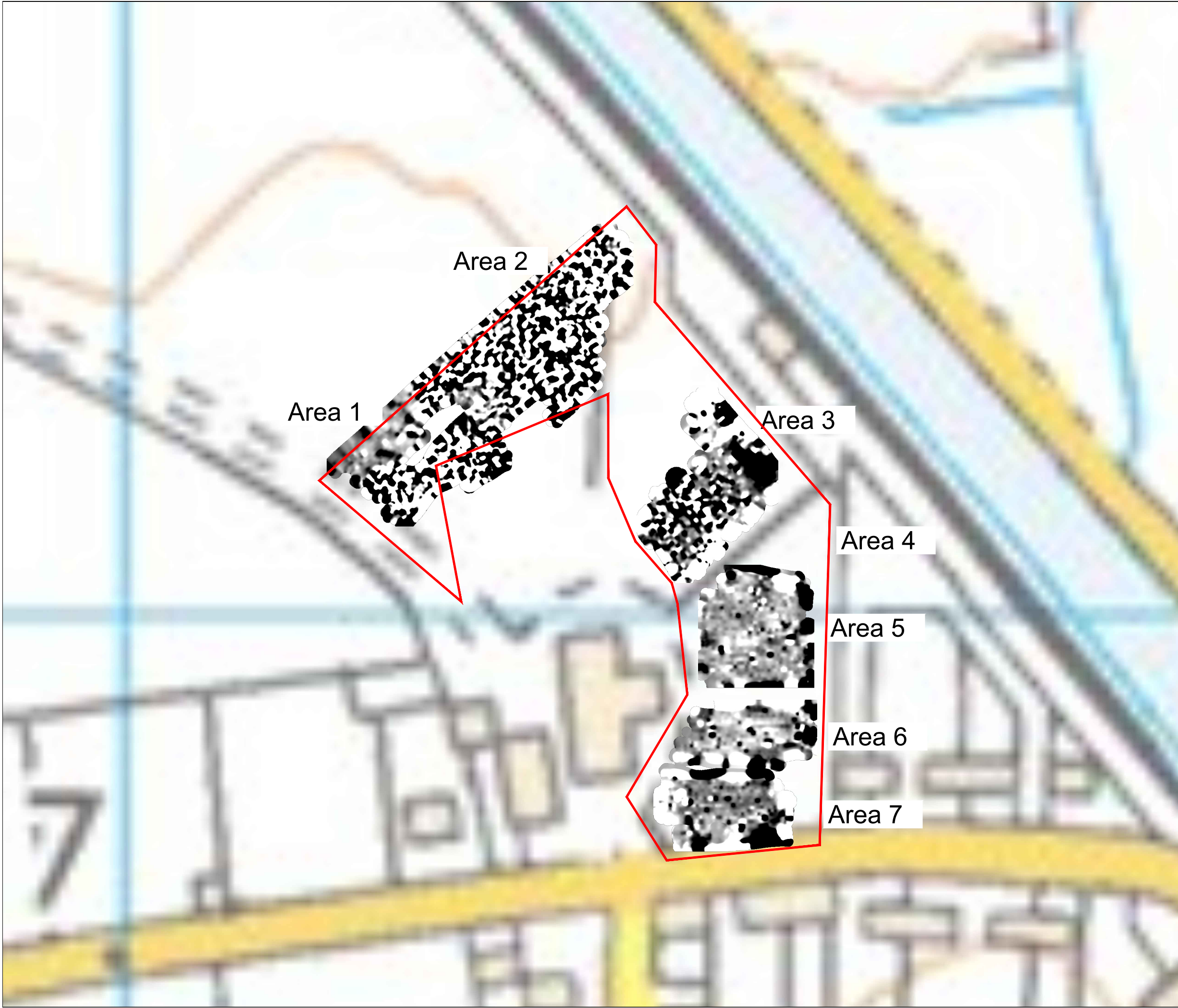
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Licence No: 100018665



Survey Areas



Title: Site Location	
Client: Pegasus Group	
Project: SUMO-21349: Land off Chalk Road, Higham, Kent	
Scale: NOT TO SCALE	Fig No: 01



Title:
Magnetometer Survey - Greyscale Plots

Client:
Pegasus Group

Project:
SUMO-21349: Land off Chalk Road, Higham,
Kent

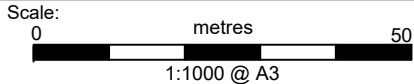
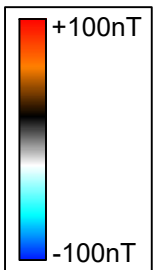


Fig No:
A



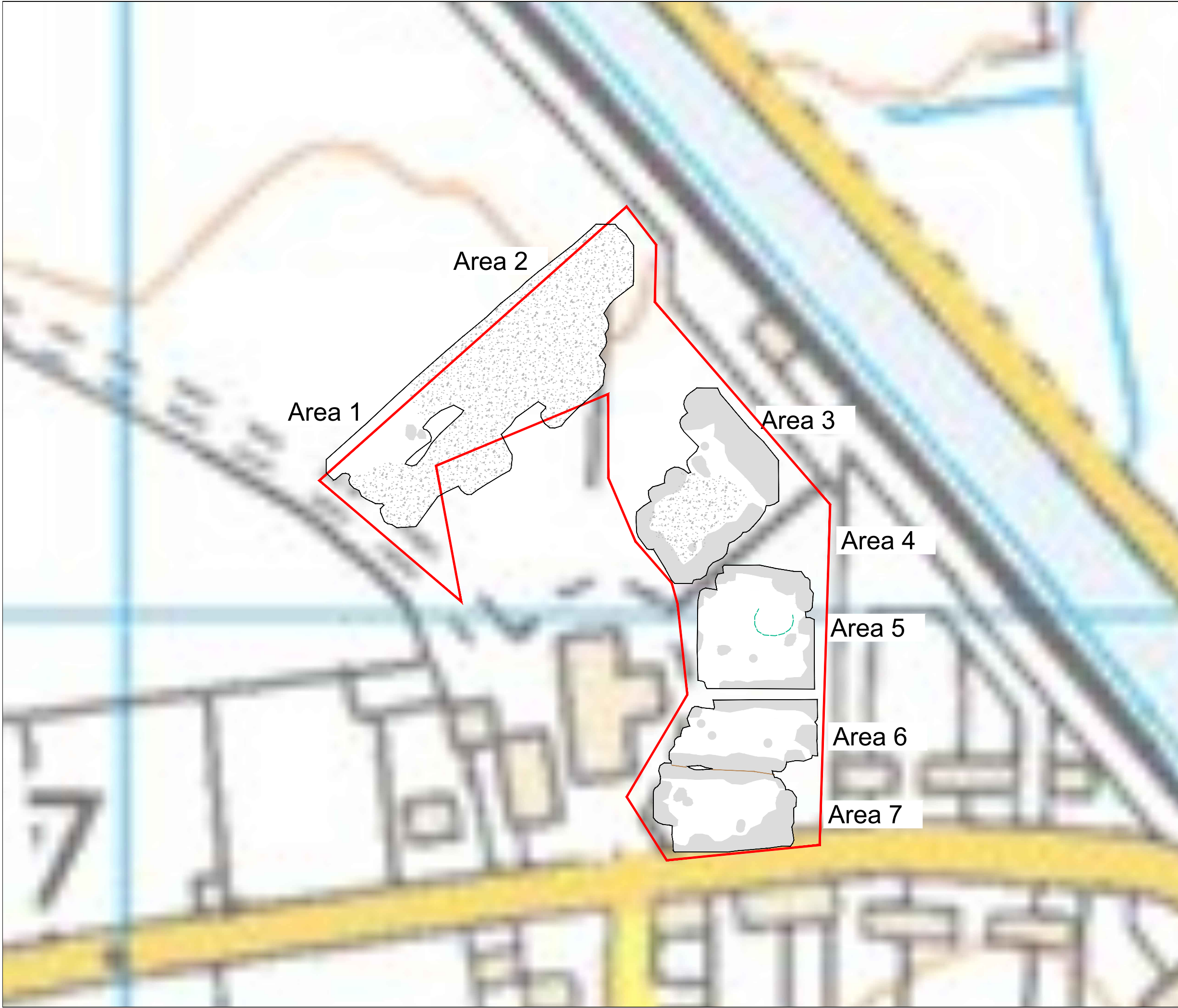
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Magnetometer Survey - Colour Plots

Client:
Pegasus Group

Project:
SUMO-21349: Land off Chalk Road, Higham,
Kent

Scale:
0 metres 50
1:1000 @ A3

Fig No:
B



KEY

	Uncertain Origin (trend)
	Fence line (corroborated)
	Magnetic disturbance
	Ferrous



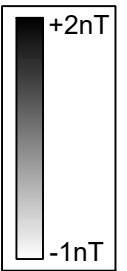
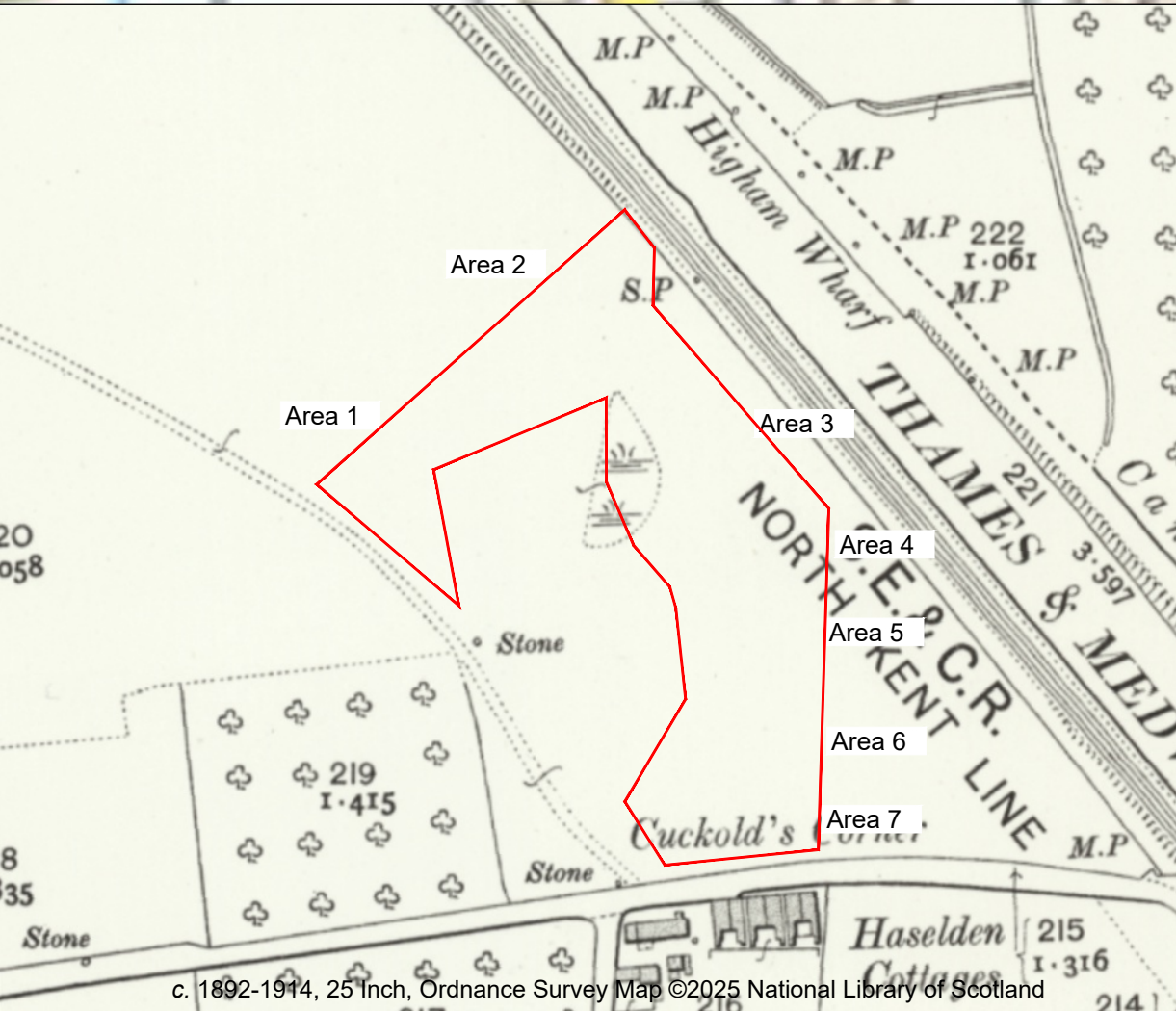
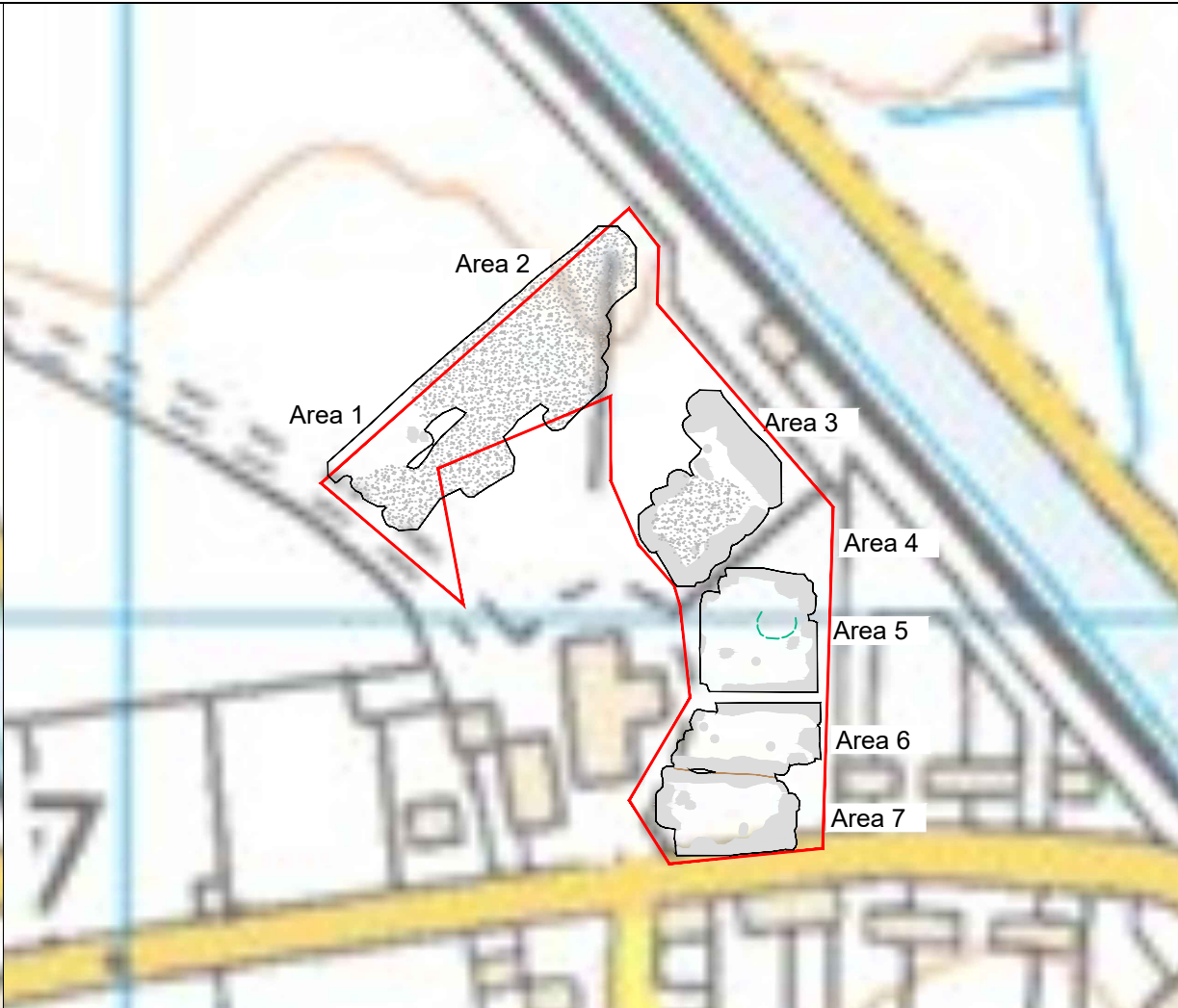
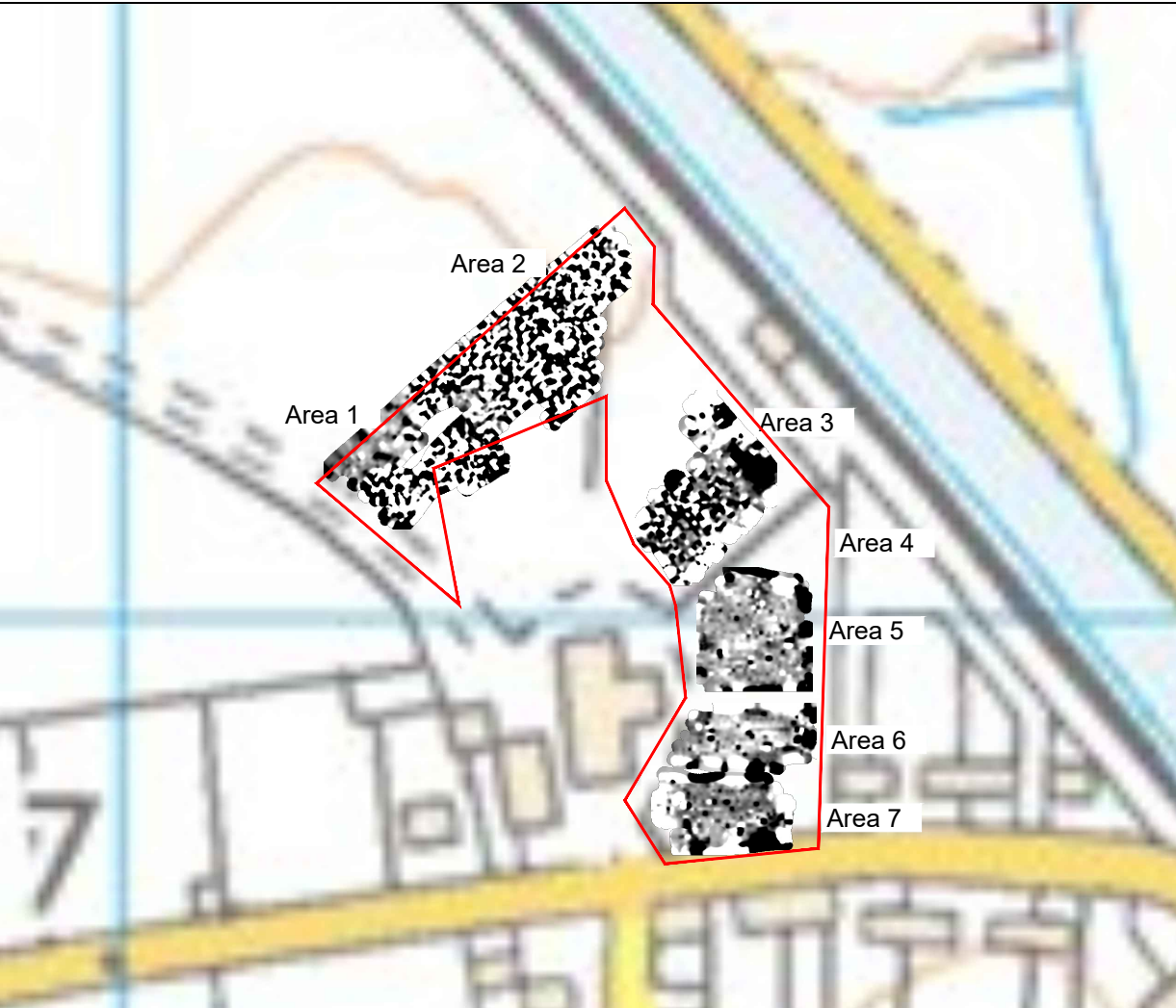
Title: Magnetometer Survey - Interpretation

Client: Pegasus Group

Project: SUMO-21349: Land off Chalk Road, Higham, Kent

Scale: 0 metres xx
1: @ A3

Fig No: 04



KEY

	Uncertain Origin (trend)
	Fence line (corroborated)
	Magnetic disturbance
	Ferrous



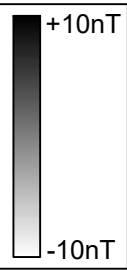
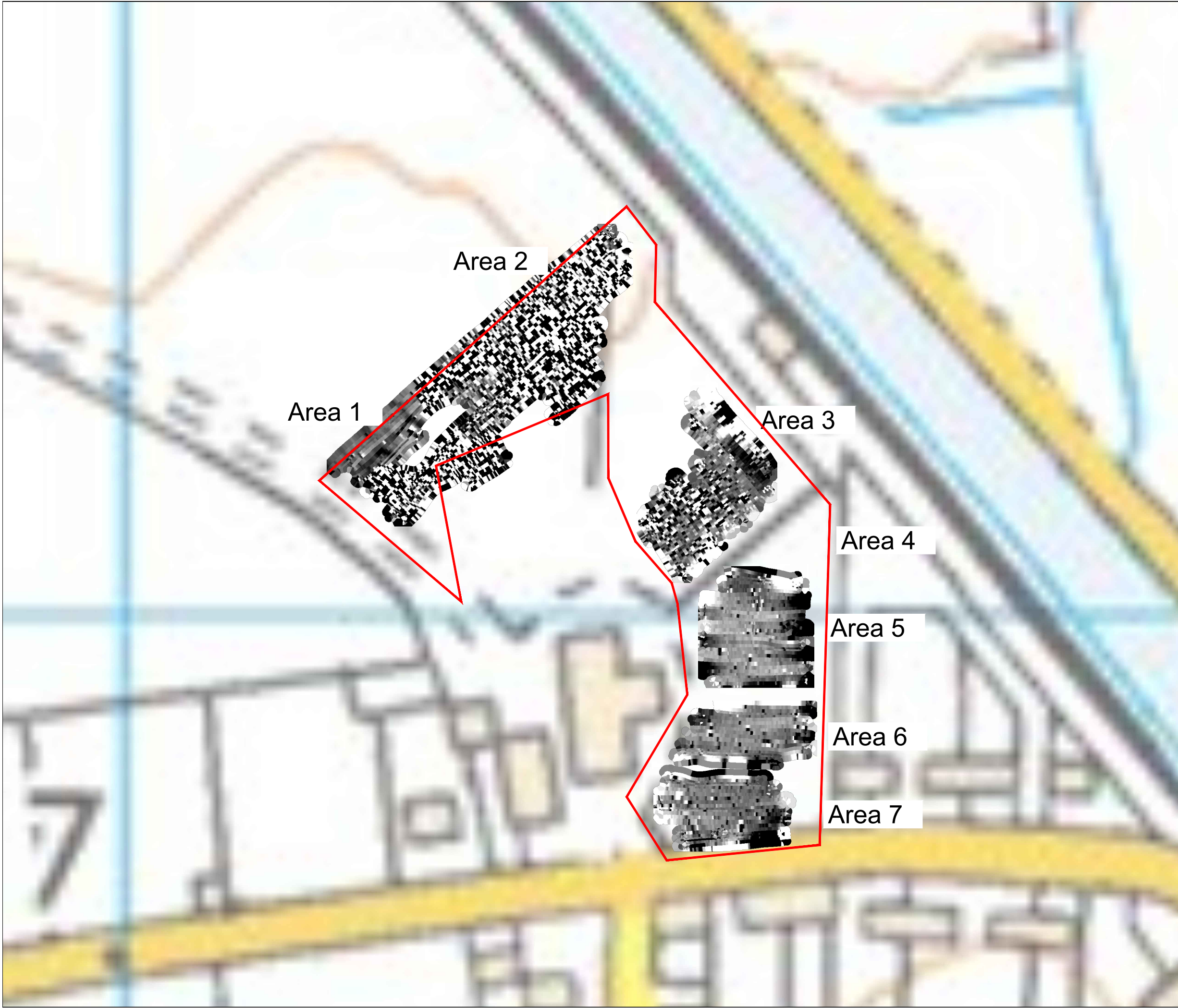
Title: Greyscale Plots / Interpretation / c. 1892-1914
Ordnance Survey Map / 2022 Aerial Image

Client: Pegasus Group

Project: SUMO-21349: Land off Chalk Road, Higham,
Kent

Scale: NOT TO SCALE

Fig No: 05



Title: Minimally Processed Data - Greyscale Plots	
Client: Pegasus Group	
Project: SUMO-21349: Land off Chalk Road, Higham, Kent	
Scale: 0 50 metres 1:1000 @ A3	Fig No: 06



Title: XY Trace Plots (clipped at +/-15nT)	
Client: Pegasus Group	
Project: SUMO-21349: Land off Chalk Road, Higham, Kent	
Scale: 0 50 metres 1:1000 @ A3	Fig No: 07

Appendix A - Technical Information: Magnetometer Survey Method

Grid Positioning

For hand held gradiometers the location of the survey grids has been plotted together with the referencing information. Grids were set out using a Trimble R8 Real Time Kinematic (RTK) VRS Now GNSS GPS system.

An RTK GPS (Real-time Kinematic Global Positioning System) can locate a point on the ground to a far greater accuracy than a standard GPS unit. A standard GPS suffers from errors created by satellite orbit errors, clock errors and atmospheric interference, resulting in an accuracy of 5m-10m. An RTK system uses a single base station receiver and a number of mobile units. The base station re-broadcasts the phase of the carrier it measured, and the mobile units compare their own phase measurements with those they received from the base station. This results in an accuracy of around 0.01m.

Technique	Instrument	Traverse Interval	Sample Interval
Magnetometer	Bartington Grad 601-2	1.0m	0.25m
Magnetometer	Bartington Cart System	1.0m	0.125m

Instrumentation:

Bartington instruments operate in a gradiometer configuration which comprises fluxgate sensors mounted horizontally, set 1.0m apart. The fluxgate gradiometer suppresses any diurnal or regional effects. The instruments are carried, or cart mounted, with the bottom sensor approximately 0.1-0.3m from the ground surface. At each survey station, the difference in the magnetic field between the two fluxgates is measured in nanoTesla (nT). The sensitivity of the instrument can be adjusted; for most archaeological surveys the most sensitive range (0.1nT) is used. Generally, features up to 1m deep may be detected by this method, though strongly magnetic objects may be visible at greater depths.

Bartington Grad 601-2

Hand-Held: Data will be collected using a Bartington Grad 601-2. The instrument consists of two paired sensors and readings are logged at 0.25m centres along traverses 1.0m apart across 30m grids. The collection of data at 0.25m centres provides an appropriate methodology balancing cost and time with resolution as per Historic England guidelines

Bartington Cart System

Data will be collected using a cart carrying four paired Bartington magnetic sensors. Each data point is geographically referenced using an on-board Trimble RTK survey grade GPS system. Readings will be taken at 0.125m centres along traverses 1.0m apart.

Data Processing

Zero Mean	This process sets the background mean of each traverse within each grid to zero.
Traverse	The operation removes striping effects and edge discontinuities over the whole of the data set.
Step Correction (De-stagger)	When gradiometer data are collected in 'zig-zag' fashion, stepping errors can sometimes arise. These occur because of a slight difference in the speed of walking on the forward and reverse traverses. The result is a staggered effect in the data, which is particularly noticeable on linear anomalies. This process corrects these errors.

Display

Greyscale/ Colourscale Plot	This format divides a given range of readings into a set number of classes. Each class is represented by a specific shade of grey, the intensity increasing with value. All values above the given range are allocated the same shade (maximum intensity); similarly, all values below the given range are represented by the minimum intensity shade. Similar plots can be produced in colour, either using a wide range of colours or by selecting two or three colours to represent positive and negative values. The assigned range (plotting levels) can be adjusted to emphasise different anomalies in the data-set.
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Interpretation Categories

In certain circumstances (usually when there is corroborative evidence from desk-based or excavation data) very specific interpretations can be assigned to magnetic anomalies (for example, *Roman Road, Wall, etc.*) and where appropriate, such interpretations will be applied. The list below outlines the generic categories commonly used in the interpretation of the results.

<i>Archaeology / Probable Archaeology</i>	This term is used when the form, nature and pattern of the responses are clearly or very probably archaeological and /or if corroborative evidence is available. These anomalies, whilst considered anthropogenic, could be of any age.
<i>Possible Archaeology</i>	These anomalies exhibit either weak signal strength and / or poor definition, or form incomplete archaeological patterns, thereby reducing the level of confidence in the interpretation. Although the archaeological interpretation is favoured, they may be the result of variable soil depth, plough damage or even aliasing as a result of data collection orientation.
<i>Industrial / Burnt-Fired</i>	Strong magnetic anomalies that, due to their shape and form or the context in which they are found, suggest the presence of kilns, ovens, corn dryers, metal-working areas or hearths. It should be noted that in many instances modern ferrous material can produce similar magnetic anomalies.
<i>Former Field Boundary (probable & possible)</i>	Anomalies that correspond to former boundaries indicated on historic mapping, or which are clearly a continuation of existing land divisions. Possible denotes less confidence where the anomaly may not be shown on historic mapping but nevertheless the anomaly displays all the characteristics of a field boundary.
<i>Ridge & Furrow</i>	Parallel linear anomalies whose broad spacing suggests ridge and furrow cultivation. In some cases, the response may be the result of more recent agricultural activity.
<i>Agriculture (ploughing)</i>	Parallel linear anomalies or trends with a narrower spacing, sometimes aligned with existing boundaries, indicating more recent cultivation regimes.
<i>Land Drain</i>	Weakly magnetic linear anomalies, quite often appearing in series forming parallel and herringbone patterns. Smaller drains may lead and empty into larger diameter pipes, which in turn usually lead to local streams and ponds. These are indicative of clay fired land drains.
<i>Natural</i>	These responses form clear patterns in geographical zones where natural variations are known to produce significant magnetic distortions.
<i>Magnetic Disturbance</i>	Broad zones of strong dipolar anomalies, commonly found in places where modern ferrous or fired materials (e.g. brick rubble) are present.
<i>Service</i>	Magnetically strong anomalies, usually forming linear features are indicative of ferrous pipes/cables. Sometimes other materials (e.g. pvc) or the fill of the trench can cause weaker magnetic responses which can be identified from their uniform linearity.
<i>Ferrous</i>	This type of response is associated with ferrous material and may result from small items in the topsoil, larger buried objects such as pipes, or above ground features such as fence lines or pylons. Ferrous responses are usually regarded as modern. Individual burnt stones, fired bricks or igneous rocks can produce responses similar to ferrous material.
<i>Uncertain Origin</i>	Anomalies which stand out from the background magnetic variation, yet whose form and lack of patterning gives little clue as to their origin. Often the characteristics and distribution of the responses straddle the categories of <i>Possible Archaeology / Natural</i> or (in the case of linear responses) <i>Possible Archaeology / Agriculture</i> ; occasionally they are simply of an unusual form.

Where appropriate some anomalies will be further classified according to their form (positive or negative) and relative strength and coherence (trend: weak and poorly defined).

Appendix B - Technical Information: Magnetic Theory

Detailed magnetic survey can be used to effectively define areas of past human activity by mapping spatial variation and contrast in the magnetic properties of soil, subsoil and bedrock. Although the changes in the magnetic field resulting from differing features in the soil are usually weak, changes as small as 0.1 nanoTeslas (nT) in an overall field strength of 48,000 (nT), can be accurately detected.

Weakly magnetic iron minerals are always present within the soil and areas of enhancement relate to increases in *magnetic susceptibility* and permanently magnetised *thermoremanent* material.

Magnetic susceptibility relates to the induced magnetism of a material when in the presence of a magnetic field. This magnetism can be considered as effectively permanent as it exists within the Earth's magnetic field. Magnetic susceptibility can become enhanced due to burning and complex biological or fermentation processes.

Thermoremanence is a permanent magnetism acquired by iron minerals that, after heating to a specific temperature known as the Curie Point, are effectively demagnetised followed by re-magnetisation by the Earth's magnetic field on cooling. Thermoremanent archaeological features can include hearths and kilns; material such as brick and tile may be magnetised through the same process.

Silting and deliberate infilling of ditches and pits with magnetically enhanced soil creates a relative contrast against the much lower levels of magnetism within the subsoil into which the feature is cut. Systematic mapping of magnetic anomalies will produce linear and discrete areas of enhancement allowing assessment and characterisation of subsurface features. Material such as subsoil and non-magnetic bedrock used to create former earthworks and walls may be mapped as areas of lower enhancement compared to surrounding soils.

Magnetic survey is carried out using a fluxgate gradiometer which is a passive instrument consisting of two sensors mounted vertically 1m apart. The instrument is carried about 30cm above the ground surface and the top sensor measures the Earth's magnetic field whilst the lower sensor measures the same field but is also more affected by any localised buried feature. The difference between the two sensors will relate to the strength of a magnetic field created by this feature, if no field is present the difference will be close to zero as the magnetic field measured by both sensors will be the same.

Factors affecting the magnetic survey may include soil type, local geology, previous human activity and disturbance from modern services.

Appendix C - OASIS Summary Sheet

OASIS Summary for sumogeop1-532775

OASIS ID (UID)	sumogeop1-532775
Project Name	Geophysical Survey, Magnetometry Survey at Chalk Road, Higham, Kent
Sitename	Chalk Road, Higham, Kent
Sitecode	21349
Project Identifier(s)	21349
Activity type	Geophysical Survey, Magnetometry Survey, MAGNETOMETRY SURVEY
Planning Id	
Reason For Investigation	Planning: Pre application
Organisation Responsible for work	SUMO Geophysics Ltd.
Project Dates	02-Apr-2025 - 02-Apr-2025
Location	Chalk Road, Higham, Kent NGR : TQ 71167 73010 LL : 51.43024129222453, 0.460879572461984 12 Fig : 571167,173010
Administrative Areas	Country : England County/Local Authority : Kent Local Authority District : Gravesham Parish : Higham
Project Methodology	Detailed magnetic survey (magnetometry) was chosen as the most efficient and effective method of locating the type of archaeological anomalies which might be expected at this site. All survey techniques followed the guidance set out by ClfA (2020) and the European Archaeology Council (EAC) (2016). Bartington Cart System Traverse Interval 1.0m Sample Interval 0.125m
Project Results	A detailed magnetometer survey was conducted over approximately 0.9 hectares of land at Higham and it has not identified any anomalies of definite archaeological interest. A tentative sub-circular trend is of uncertain origin. Strong magnetic disturbance associated with former buildings plus made ground or landscaping is mapped in the results, along with the line of an existing fence.
Keywords	
Funder	Private or public corporation Pegasus Group
HER	Kent HER - unRev - STANDARD
Person Responsible for work	Rebecca Fradgley
HER Identifiers	
Archives	

Appendix D – Data Management Plan & Archive Selection Strategy

Data Management Plan

Project ID / OASIS ID

SUMO-21349 / sumogeop1-532775

Project Name

Land off Chalk Road, Higham

Project Description

Detailed magnetic survey over approx. 0.9ha

Client

Pegasus Group on behalf of Richborough Ltd

Project Manager

Rebecca Fradgley

Field Leader

Robert Knight

Date DMP created

28.03.2025

Date DMP last updated

09.04.2025

Version

2

Technique - data

Detailed magnetic survey.

Manual – cart - other

Handheld cart magnetometers.

Documentation and metadata

All documentation and data produced so far are stored on SUMO servers in a specific job file.

Data storage, access and back-up

- SUMO Secure server during the project life set up in a RAID configuration (a RAID configuration incorporates a level of data redundancy meaning if a single hard drive in fails data can still be restored).

- Snap shots of the data will be made at several intervals during the day to allow data to be restored for up to 30 days if changed / deleted.
- Once the final report has been completed data will be moved onto NAS drive set up in a RAID configuration.
- All data is backed up to an off-site location (Cloud storage).

ADS or other depository - Costs

ADS has not been requested, all data, reports and corresponding documentation are securely stored by SUMO.

Digital files and data to be selected for archiving

- Raw data in XYZ format .csv and .png plus .pgw world file
- Processed data as .png plus .pgw world file
- Survey written report .pdf
- Survey photos .png

CAD and Vector graphics (interpretations) in .dwg format

Notes

Project ID / OASIS ID

SUMO-21349 / sumogeop1-532775

Project Name

Land off Chalk Road, Higham

Project Description



- Archaeological Geophysics
- Engineering Geophysics
- Measured Building Services
- Utility and Topographic Services
- Aerial Surveys
- Rail Surveys

SUMO GeoSurveys is a trading name of SUMO Geophysics Ltd.
SUMO Services Ltd, incorporated under the laws of England and Wales,
Company Registration No.4275993.
Registered Office Unit 8 Hayward Business Centre, New Lane, Havant, Hampshire, PO9 2NL

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Birmingham (City)

39 Bennetts Hill, Birmingham, B2 5SN

T 0121 308 9570

Birmingham@pegasusgroup.co.uk

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