

# Heritage Statement & Archaeological Desk-Based Assessment.

Land to the east of Wrotham Road, Meopham, Gravesend, Kent, DA13 0JL.

On behalf of Richborough

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# 1. Introduction

1.1. Pegasus Group have been commissioned by Richborough to prepare a Heritage Statement and Archaeological Desk-Based Assessment to consider the proposed residential development at land to the east of Wrotham Road, Meopham, Gravesend, Kent, DA13 0JL, as shown on the Site Location Plan provided at Plate 1.

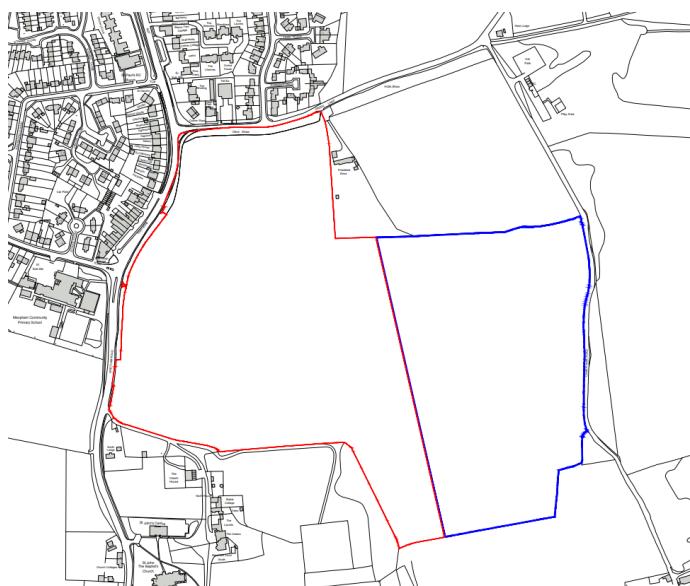


Plate 1: Site Location Plan

1.2. Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of

vehicular access from Wrotham Road and all other matters are reserved.

1.3. The Site is located to the east of Wrotham Road, encompasses one large arable field and a stretch of land extending into a larger arable field to the east. Part of the southern boundary of the Site is shared with the northern boundary of *Meopham The Street Conservation Area*. There are no other designated heritage assets located within the Site.

1.4. 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".<sup>1</sup>***

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the built 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.

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

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

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<sup>2</sup> 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 matters pertaining to 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 and the Kent History and Library Centre;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above; and
- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's

2.4. Soilscapes Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

2.5. 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**.

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

2.7. 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 azimuth set at 45°, is provided in **Appendix 2**.

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

## Site Visit

2.8. Site Visits were undertaken by a Heritage Consultant from Pegasus Group on 6<sup>th</sup> March 2025 and 6<sup>th</sup> June 2025, during which the Site and its surrounds were assessed.

## Geophysical Survey

2.9. A geophysical survey was undertaken across the Site in April 2025. The survey identified anomalies of natural and undetermined origins. Modern interference was limited to the edges and isolated areas within the survey areas, associated with extant field boundaries and ferrous debris. The results of the survey are discussed further in Section 5 and a full copy of the geophysical survey report is included in **Appendix 7**.

## 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*,<sup>3</sup>
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter GPA:2);<sup>4</sup>
- *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);<sup>5</sup>
- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter HEAN:1).<sup>6</sup>

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

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

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

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

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

### 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.<sup>9</sup> With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the NPPF.<sup>10</sup>

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.<sup>11</sup>

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.<sup>12</sup> 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.***<sup>13</sup>

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

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

<sup>9</sup> MHCLG, NPPF, paras. 214 and 215.

<sup>10</sup> MHCLG, NPPF, para. 216.

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

<sup>12</sup> MHCLG, PPG, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

<sup>13</sup> 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 located to the east of Wrotham Road and south of Green Lane. The Site is 15.73ha in size and encompasses one large arable field and a stretch of land extending into a larger field to the east, forming two parcels. The surrounding area to the north and northwest of the Site comprises the residential areas of Hook Green. A row of shops and restaurants known as The Parade marks the eastern edge of this residential area and lies directly opposite the western edges of the Site. Bordering the northeastern edges of the Site is a residential dwelling known as Priestfield Shaw with its attached drive and gardens. This is separated from the Site by a mature hedgerow and interspersed trees. To the immediate south of the Site lies the grounds and residential buildings associated with the former Meopham Court. The historic context and development of Meopham Court will be discussed further in Sections 5 & 6. Beyond Meopham Court lies the Grade I Listed Parish Church of St John the Baptist and then the wider settlement of Meopham. Agricultural land surrounds the Site on its eastern side.

3.2. A low hedgerow runs through the Site separating the two land parcels. The western and northern boundaries of the Site, which run along Wrotham Road and Green Lane comprise a mature vegetation screen, consisting of tall trees and lower-height shrubs. The boundaries are also marked by a rising bank which positions the Site at a higher level to the adjacent roads.

3.3. The southern boundary of the Site comprises two components. The eastern half of the boundary is marked

by a low wire mesh and timber post fence, with a high hedgerow beyond which marks the boundary edge of the grounds of the former Meopham Court to the south. The western half of the boundary is marked by a low metal fence, which has become overgrown with mature shrubs and interspersed trees. Beyond this part of the boundary is a private driveway which is lined with mature vegetation and tall trees on its southern side. This provides access to several residential dwellings at the former Meopham Court.



Plate 2: North-westwards view across the Site from the southeast corner (photograph taken March 2025).



Plate 3: The low hedgerow boundary traversing through the Site, between the main field area and plot of land to the east (photograph taken March 2025).



Plate 4: The treeline boundary along the western boundary of the Site along Wrotham Road (photograph taken March 2025).



Plate 5: Northern boundary of the Site along Green Lane (photograph taken March 2025).



Plate 6: The eastern half of the southern boundary of the Site (photograph taken March 2025).



*Plate 7: The western half of the southern boundary of the Site  
(photograph taken March 2025).*

### **Planning History**

- 3.4. A review of the planning history records held online by Gravesham Borough Council shows there have been several previous planning applications for the Site.
- 3.5. The Site was subject to an application for residential development in 1957, which included a number of other sites (Ref. 19570102). This was refused for a number of reasons, none of which related to the historic environment.

## 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.<sup>14</sup>

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.<sup>15</sup>

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.<sup>16</sup> The PPG also contains the *National Design Guide*.<sup>17</sup>

4.5. Full details of the relevant national policy guidance are provided within **Appendix 5**.

### The Development Plan

4.6. Applications for Planning Permission are currently considered against the policy and guidance set out within the Gravesham Local Plan Core Strategy (2014).

4.7. The Site has been allocated for potential new development in the Regulation 18 Stage 2 Consultation *Part 1: Local Plan core strategy partial review and site allocations* (October 2020).

4.8. Details of the policy specific relevant to the application proposals are provided within **Appendix 6**.

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

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

<sup>16</sup> Ministry of Housing, Communities & Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14<sup>th</sup> February 2024),

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

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

## 5. The Archaeological Resource

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.

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

### Previous Archaeological Works

5.4. Geophysical surveys (Magnitude Surveys; **Appendix 7**) were undertaken across the Site in April 2025. This also included the survey of an additional site referred to in the Survey Report as 'Area 1'. The Site, comprises 'Area 2' and 'Area 3'. The Survey made the following conclusions:

***"Several anomalous spreads were detected in Area 2 (Figures 9 & 12). The spreads detected to the north of Area 2 likely result from accretions of superficial deposits of clay, silt, sand and gravel. The southern spread is likely due to the weathering of the underlying chalk bedrock.***

***Several weakly enhanced, linear, curvilinear and discrete anomalies have been detected within Areas 1-3 and categorised as undetermined (Figures 6, 9 & 12). Due to a limited context and a lack of clear***

***anthropogenic patterns or morphologies a more confident interpretation cannot be provided, though an archaeological provenance cannot be discounted.***

...

***Numerous weakly enhanced linear, curvilinear and discrete anomalies have been detected across Areas 1-3 (Figures 6, 9 & 12). These anomalies do not correspond with any mapped features meaning a more definite classification cannot be given."***

Previous archaeological work recorded by the HER is shown on Figure 2 and is primarily located within the southern extent of the 1km study area. The record is largely made up of previous excavation work at Meopham School, c.580m south of the Site (EKE15381, EKE16551, EKE19233). Other instances of previous archaeological work include several desk-based assessments and watching briefs.

5.5.

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

### Topography and Geology

5.6.

The topography of the Site slopes downwards from the southern boundary at c.124m AOD to the northern boundary at c.110m AOD.

5.7.

The solid geology within the Site is mapped as a mixture of Lewes Nodular Chalk Formation, Seaford Chalk

Formation and Newhaven Chalk Formation across the northern extent, which was formed between 93.9 and 72.1 million years ago during the Cretaceous period; and Thanet Formation across the southern extent comprising sand, which formed between 59.2 and 56 million years ago during the Palaeogene period. The superficial geology mapped across the southern and central areas of the Site is mapped as Head, comprising clay, silt, sand and gravel, which formed between 2.588 million years ago and the present during the Quaternary period.<sup>18</sup> The superficial geology which extends within the Site may form part of wider paleochannels; however, such features do not appear show clearly in LiDAR imagery of the Site. As described in the geophysical survey, the spread of anomalies detected in Area 2 are likely associated with the superficial deposits and hard bedrock within the Site.

- 5.9. Furthermore, a review of the borehole record shows there have been no surveys within the Site or within its immediate surrounds.<sup>19</sup>
- 5.10. The Site is largely characterised with Soilscape 8, comprising acid loamy and clayey soils with impeded drainage. The western edges of the Site are characterised as Soilscape 3, comprising shallow lime rich soils over chalk or limestone.<sup>20</sup>



Plate 8: Extract of superficial Head deposits overlaid onto LiDAR imagery of the Site and its immediate surrounds.

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

<sup>19</sup> British Geological Survey, BGS GeoIndex (onshore), <https://www.bgs.ac.uk/map-viewers/geoindex-onshore/>

<sup>20</sup> Cranfield University, *Soilscapes*, <http://www.landis.org.uk/soilscapes/>.

## Digital terrain model LiDAR

5.11. Reviewing the LiDAR data for the Site, there are no obvious features visible in the imagery. The imagery does not show any indications of previous settlement activity within the Site or any geological features. Full LiDAR imagery of the Site is illustrated at Figure 4 in **Appendix 2**.

## Archaeological Baseline

### Prehistoric (pre-c.43AD)

5.12. No archaeology relating to the prehistoric period has been recorded by the HER within the Site and no anomalies suggestive of activity of prehistoric date were recorded within the Site during the geophysical survey. As discussed above, the geological record shows there may have been possible paleochannels extending into the Site associated with superficial head deposits. It is possible for Palaeolithic activity to have occurred around the edges of such channels.

5.13. Eight palaeolithic handaxes (surface-finds) have been recorded within Meopham (MWX20789); however, the precise location of each find is unknown. The HER has georeferenced the record c.230m south of the Site.

5.14. A potential Mesolithic site has been recorded c.615m southwest of the Site (MKE1439); however, the accuracy of the record's location is uncertain as it was based on the finds of Mesolithic implements '*found at Meopham*'.

5.15. Settlement activity dating from the late Neolithic to the early Romano-British periods was recorded during excavation work (2016) at Meopham School, c.600m south of the Site. A single pit was found containing flint

provisionally dated to the Neolithic period (MKE114421 & EKE19233). Further pits in the vicinity may also have dated to this period but contained no dateable evidence. A number of other prehistoric features were recorded, including boundary ditches, pits and a potential flint trackway (MKE98617 & MKE114422). These all included large quantities of late Bronze Age to Iron Age pottery, common burnt flint and worked flint. A large curvilinear ditch aligning with eight postholes, were found containing Iron Age and early Romano-British pottery (MKE114423). The ditch appeared to have been deliberately backfilled in the late Iron Age or early Roman period and a child inhumation was inserted into the ditch. The above features were covered by a deposit of colluvium that was in places up to 0.5m thick and contained prehistoric material including burnt flint. Topographical data shows the possible settlement sat upon a raised area between the mapped extent of two water channels, as indicated by geological data, to the east and west.

5.16. Metal detectorists in the area have recorded several metal artefacts, including an Iron Age copper alloy toggle c.270m southeast of the Site (MKE95448); and an Iron Age copper alloy coin c.615m southwest of the Site (MKE67378).

5.17. Faint cropmarks of a possible Bronze Age ring ditch and a possible later prehistoric rectilinear enclosure are visible on aerial photographs from June 2008 (MKE123295). These are recorded in a field c.940m southwest of the Site. The ring ditch appears to sit within the enclosure; however, no strong relationship between them is apparent from the cropmarks.

Romano-British (AD 43 – 410)

5.18. No archaeology relating to the Romano-British period has been recorded by the HER within the Site and no anomalies suggestive of activity of Romano-British date were recorded within either Site during the geophysical survey.

5.19. A Romano-British site has been recorded by the HER c.270m south of the Site (MKE115928). The HER states the site was '*discovered near the church in 1988*'; however, no further information is provided in reference to the record.

5.20. As discussed above, early Romano-British finds were recorded during excavation work at Meopham School, c.600m south of the Site (MKE1436 & EKE3872).

5.21. A Roman copper alloy coin was recorded by metal detectorists c.490m northeast of the Site (MKE120881).

Early medieval (410 AD – 1066) and Medieval (1066 – 1539)

5.22. No archaeology relating to the early medieval or medieval periods has been recorded by the HER within the Site and no anomalies suggestive of activity of medieval date were recorded within either Site during the geophysical survey.

5.23. Documentary sources indicate early settlement activity during the late Anglo-Saxon period, with a number of primary sources mentioning Meopham and a group of Saxon wooden buildings (MKE1447). The precise location of this earlier settlement is uncertain; although, the HER has georeferenced the record c.120m south of the Site within the grounds of the later established Meopham Court.

5.24. Within the field directly to the east of the Site, metal detectorists have found an early medieval lead gaming piece, c.60m from the Site's edge (MKE110610); and a medieval copper alloy mount, c.180m from the Site's edge (MKE110609).

5.25. The Grade I Listed Parish Church of St John the Baptist lies c.200m south of the Site (MKE1392). The Church was built between 1320 and 1325 and rebuilt in 1326 following an earthquake. The church experienced a number of restorations during the 19<sup>th</sup> century.

5.26. Within Hook Green are four Grade II Listed Buildings, Old Forge Cottage, Hook Green Farmhouse, Mulberry House and Waterditch (MKE13832, MKE27782, MKE27574 & MKE27576). These mostly date from the early 16<sup>th</sup> century except for Old Forge Cottage which dates to the mid-14<sup>th</sup> century. These are located between c.510m and c.780m north of the Site.

5.27. Other instances of medieval archaeology recorded by the HER includes a coin hoard dating from c.1539 (MKE1434), located c.650m south of the Site; and a lead alloy seal found by metal detectorists c.670m southeast of the Site (MKE95446).

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

5.28. No archaeology relating to the post-medieval, early modern or modern periods has been recorded by the HER within the Site and no anomalies suggestive of significant activity of post-medieval to modern date were recorded within the Site during the geophysical survey.

5.29. Post medieval, early modern and modern activity recorded within the study area largely comprises instances of former and extant buildings, structures, or farmsteads. As shown in Figure 3, these are generally spread throughout the study area, with some concentrations in and around Hook Green to the north, Camer Park to the east and Meopham to the south.

5.30. Recorded c. 20m west of the Site, on the opposite side of Wrotham Road and south of the junction with Longfield Road lies a milestone with post-medieval to modern origins (MKE77426). The milestone is still present within the grass verge along the side of Wrotham Road.

5.31. An early-20<sup>th</sup>-century, George VI pillar box is currently present and recorded by the HER near the parade of shops opposite the Site, c.25m to the west (MKE77933).

5.32. Several 'monuments' originate from the Second World War, including the approximate location of a possible barrage balloon site c.442m northwest of the Site 'east of an orchard at Hook Green' (MKE41761); and a Home Guard Battle Headquarters c.450m southwest of the Site at The George Pub (MKE41688). The origin and demise of the barrage balloon site is uncertain, and the source of the record is based on 'verbal communication'.

5.33. Recorded on the northern side of Green Lane, c.30m north of the Site, is a probable Cold War telephone bunker in the basement of the telephone exchange in the northeast angle of the junction of Green Lane and the A227 (MKE41939).

5.34. Between c.275m to c.980m northeast of the Site is the mapped extent of Camer Park, an 18<sup>th</sup>-century country park which became a public park in 1971 (MKE43971).

5.35. Camer Park is identified as a non-designated Park and Garden on the HER.

Historic Development and Map Regression

5.35. The Site falls within the Parish of Meopham, and this is shown in the 1841 Tithe map (Plate 9). At that time, the Site formed part of two arable land parcels (Plots 1121 & 1123), belonging to the Meopham Court estate. The main buildings and grounds of Meopham Court were situated to the south of the Site. In 1841, Meopham Court consisted of the Manor House, which was accessed via a private drive leading from Wrotham Road to the southwest. The estate also included a farmstead to the northwest of the Manor House and an orchard located to the east. The Manor House had a rectilinear footprint, with a group of stables and outbuildings positioned to its north. The farmstead comprised a sizeable building group with enclosed yards and ponds.

5.36. The overall field and boundary layout depicted on the 1895 Ordnance Survey map generally corresponds with the existing layout of the Site (Plate 10). The map indicates areas of vegetation and shaws along the Site's northern and western boundaries. By this time, Priestfield Shaw had been established to the northeast of the Site, and the farmstead previously associated with Meopham Court had been removed. This likely marked the end of any functional relationship between Meopham Court and the Site. Following the removal of the farmstead, a new secondary access road, entrance lodge, and outbuilding were constructed to the northwest of the Manor House. To the east of the Manor House, the map also shows the development of a formal garden area, which included a walled garden.

5.37. To the west of the Site, a small residence known as *The Lances* is shown on the west side of Wrotham Road on the 1895 map. Additionally, a school comprising a single building had been established at the southwest corner of the junction between Wrotham Road and Longfield Road.

5.38. Aerial photographic imagery from 1940 and 1960 confirms the rural character of the Site and its surrounds (Plate 11 & Plate 12). The imagery shows the open nature of the Site towards the wider rural landscape on its eastern sides, while the western, northern and southern boundaries comprised intermittent vegetation varying in levels of density.

5.39. During the early 20<sup>th</sup> century, the area to the west and northwest of the Site underwent gradual development, with residential housing constructed along Longfield Road and Wrotham Road. This development also continued north towards Hook Green.

5.40. The 1962 Ordnance Survey map confirms Meopham Court had been divided into several private properties. The main Manor House had been divided into three residences, known as *Meopham Court South*, *The Cedars*, and *The Laurels*; the stables block to the north were divided and converted into *Oak Trees*, *The Bungalow* and *North House*. The square outbuilding to the north had been converted into *The Coach House*. *Meopham Court South* continued to be served by the main access drive from the southwest, while the remaining properties were accessed from the secondary drive to the northwest. The wider grounds and gardens remained largely unchanged and were likely divided up and/or shared between the new properties although discrete curtilages around some properties are likely to have been formed.

5.41. By 1990, the area of land along the southern side of Longfield Road, to the west of the Site, had been fully developed, with the construction of the Helen Allison School (Plate 14).

5.42. Since 1990, the overall character and appearance of the Site, and its surrounds appears to have remained relatively unchanged (Plate 15).

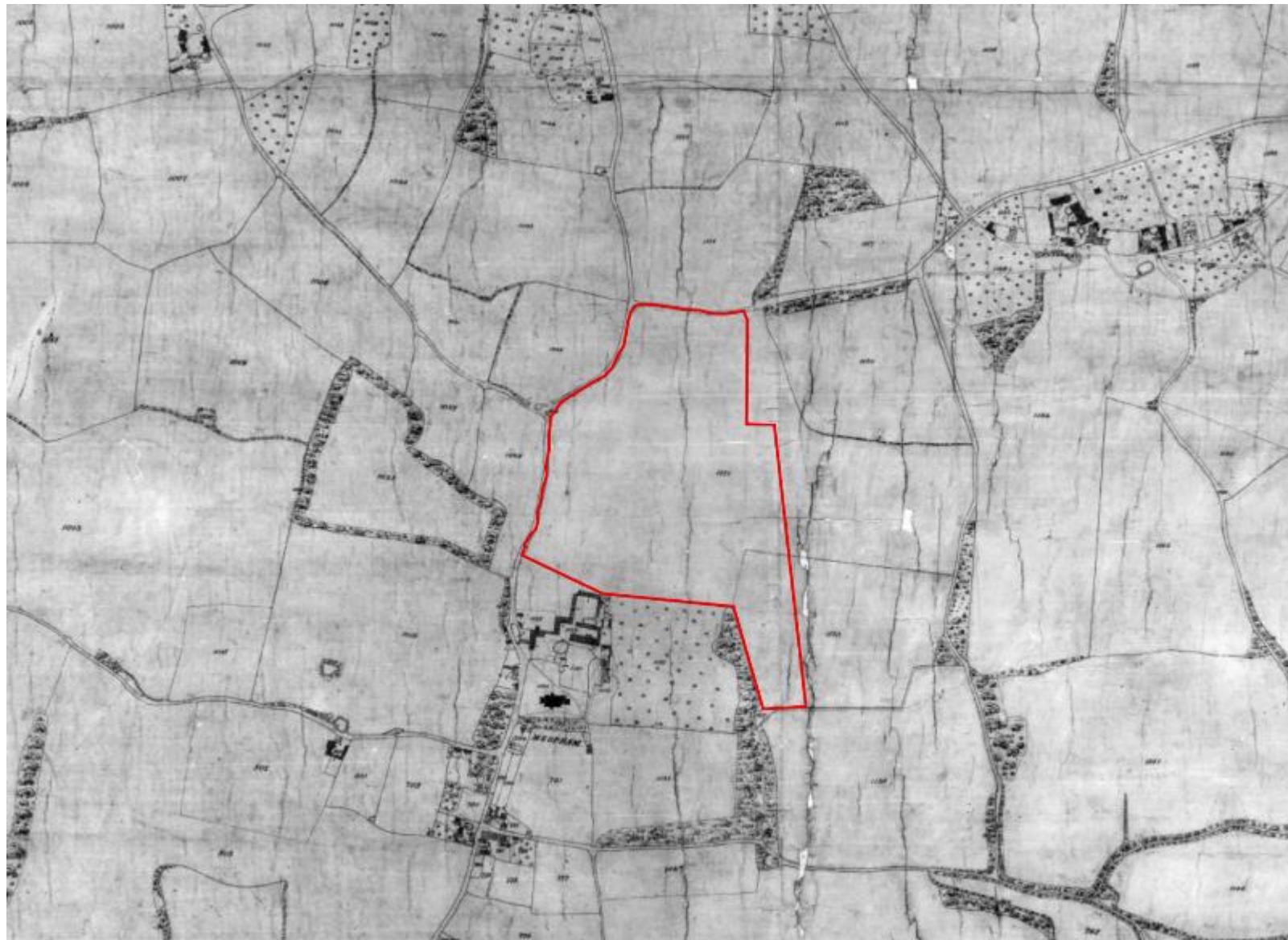


Plate 9: The 1841 Tithe Map for the Parish of Meopham, location of the Site approximately outlined in red.



Plate 10: The 1895 Ordnance Survey Map, location of the Site approximately outlined in red.



Plate 11: 1940 Aerial Imagery, location of the Site approximately outlined in red. (source: Google Imagery).



Plate 12: 1960 Aerial Photography, location of the Site approximately outlined in red. (source: Google Imagery).



Plate 13: The 1962 Ordnance Survey Map, location of the Site approximately outlined in red.



Plate 14: 1990 Google Satellite Imagery, location of the Site approximately outlined in red.



Plate 15: 2024 Google Satellite Imagery, location of the Site approximately outlined in red.

## Statement of Archaeological Potential and Significance

5.44. No anomalies suggestive of significant archaeological remains of prehistoric date were recorded during the geophysical survey across the Site. Geological data suggests a possible paleochannel extends into the Site in the form of superficial head deposits. Numerous weakly enhanced linear, curvilinear and discrete anomalies have been detected across the Site by the geophysical survey, and these anomalies do not correspond with any mapped features. The potential for Palaeolithic archaeology within the Site is considered moderate.

5.45. Settlement activity dating from the late Neolithic to the early Romano-British periods was recorded some distance to the south of the Site. However, other instances of later-prehistoric archaeology recorded within the study area is limited to small surface or sub-surface finds. Therefore, the potential for significant later-prehistoric archaeology within the Site is considered low.

5.46. No anomalies suggestive of significant archaeological remains of Romano-British date were recorded during the geophysical survey across the Site. Archaeological evidence of significant settlement activity dating from the Romano-British period is low within the study area. Therefore, the potential for such archaeology within the Site is considered low.

5.47. No anomalies suggestive of significant archaeological remains of medieval date were recorded during the geophysical survey across the Site. Settlement activity within the wider study area appears to have increased during the early-medieval, medieval and late-medieval periods, as indicated by the presence of medieval built form recorded by the HER. During this time, the Site likely formed part of the wider rural landscape of these settlements, potentially being utilised for agricultural purposes. The presence of settlement activity within the Site from this period is unlikely, although, evidence of agricultural field systems may be present.

5.48. Based on the Tithe apportionment, it is understood that the Site formed part of the agricultural operations of Meopham Court during the 19<sup>th</sup> century. The Site has remained in agricultural use, mainly as arable land.

5.49. There is no evidence to suggest any built form was present within the Site during the modern period; any other archaeology would most likely be associated with the agricultural activity, and any such remains would be unlikely to be regarded as heritage assets.

## Designated Heritage Assets

5.50. There are no designated heritages located within the boundaries of the Site.

5.51. Part of the southern boundary of the Site is shared with the northern boundary of *Meopham The Street Conservation Area*.

5.52. Inside the 1km study area, there are 22 Listed Buildings and two Conservation Areas, including *Meopham The Street*. There are no Scheduled Monuments, Registered Park and Gardens or any other designated heritage assets located within the study area.

5.53. Designated heritage assets in the vicinity of the Site are considered in further detail in the Setting Assessment Section below.

## 6. Built Historic Environment

6.1. The following Section provides an assessment of elements of the built historic environment that have the potential to be impacted upon by the proposed development.

6.2. As set out in **Section 5**, part of the southern boundary of the Site is shared with the northern boundary of *Meopham The Street Conservation Area*. As such, both the character and appearance and the setting of the Conservation Area has the potential to be impacted upon by the proposed development.

6.3. With regards to other heritage assets within the surrounds of the site 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.<sup>21</sup>

6.4. 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.

6.5. It is however widely accepted (paragraph 220 of the NPPF) that not all parts of a heritage asset will necessarily be of equal significance.<sup>22</sup> In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.

6.6. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.

6.7. 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.

6.8. It has been observed that the following heritage assets have the potential to be sensitive to the development proposals and thus these have been taken forward for further assessment below:

- Meopham The Street Conservation Area; and
- The Grade I Listed Parish Church of St John the Baptist (NHLE 1039866).

6.9. 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 positively contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or

<sup>21</sup> Historic England, GPA:3, p. 4.

<sup>22</sup> MHCLG, NPPF, para. 220.

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. Other heritage assets have therefore been excluded from further assessment within this Report.

#### **Meopham The Street Conservation Area**

6.10. Meopham The Street Conservation Area was first designated on 23<sup>rd</sup> January 1970 and the boundary was extended in 2017. A Conservation Area Appraisal document was adopted by Gravesham Borough Council in 2017 and helps form the basis for this assessment.

6.11. Meopham The Street Conservation Area encompasses the original settlement of Meopham and today has the outlying satellites of Hook Green and Meopham Green to the north and south. All three occur now as 'incidents' along the A227 (Wrotham Road). The positioning of the Grade I Listed Parish Church and the Manor House at Meopham Court, as well as their relationship to one another, were key elements of the original village. Meopham The Street takes its name from the cluster of historic buildings around a 'T' junction to the south of the Church where Wrotham Road is joined by a minor road running off to the east, known as The Street.

6.12. The historic buildings within the Conservation Area feature a traditional Kentish palette and vernacular, including weatherboarded timber frames, painted lath-and-plaster finishes, and flint walling. Brickwork is common, ranging from local plain red and red-and-blue header bricks to later yellow bricks. Some buildings also exhibit smooth stucco or modern painted render over brick. Roofs are predominantly clad in local clay peg tiles, with a few featuring Welsh slate.

6.13. The 2017 Appraisal provides a statement of special interest for the Conservation Area, stating as follows:

***"Meopham The Street Conservation Area is of special interest for its historic buildings and for the various wall-, hedge-, and tree-enclosed spaces around and to the north, east and west of the St John's Church and Meopham Court; for the hedges, tree belts and garden spaces along the Wrotham road; and for the grouping of buildings around the junction of The Street with Wrotham Road."***

6.14. With regard to local landmarks, key buildings, focal points and views, the Appraisal document states as follows

***"Because of its essential character, generally that of small scale development concealed behind hedges and/or trees or within woodland, there are few landmarks in Meopham The Street. The church and especially its tower, is one. Others are Church Cottages, the George Inn and Well House. Approaching along The Street from the east the white flank of Dodmore House signals the start of the village core from this direction.***

***A unique 'external' view of some of the south east part of the conservation area – a huddle of one and two storey brick buildings with Kent Peg tiled roofs set down behind mature trees, shrubs and hedges – is to be had from footpaths across the field to the north, between The Street and Meopham Court.***

***Generally views within and without the conservation area are dominated by nature in the form of well grown forest trees and shrubs, often as horizontally extended features (e.g. at field boundaries) that are best***

***presented graphically. These, along with the other matters remaining for consideration here are therefore left to be shown on the accompanying maps.***

**Statement of Significance**

6.15. The significance of the Meopham The Street Conservation Area is principally derived from those elements of its intrinsic character and appearance within its boundaries. These comprise aspects of its historic layout and street patterns, historic built form, and hierarchy of development, enclosed green spaces and vegetated boundaries, all of which contribute to the combined historic, architectural, artistic, and archaeological interest of the designation area. Most of these interests can be better appreciated as part of key views within the designation area.

6.16. While there is currently no statutory protection for the settings of Conservation Areas, it is evident that elements of the surrounds of the Conservation Area make some contribution to its significance, albeit less than the structures and spaces within its boundaries. Principal elements of the physical surrounds and experience of the asset (its setting) which are considered to contribute to its heritage significance comprise the open fields which immediately surround the Conservation Area and define the rural and isolated character of the settlement, particularly where they are experienced along main

approaches, namely Wrotham Road, The Street and Shipley Hill.

**The contribution of the Site**

6.17. The Site lies immediately to the north of the Meopham The Street Conservation Area. The western half of the Site's southern boundary overlaps with part of the Conservation Area's northern edge (Plate 16). This boundary is defined by a low metal fence, now largely concealed by mature shrubs and interspersed trees (Plate 17). It runs along the northern side of a private access road, previously a secondary approach to Meopham Court, which is situated within the Conservation Area. The southern side of this access road is characterised by a woodland belt that creates a strong visual screen. To the east, a hedgerow marking the garden boundary of the former Meopham Court continues along the Conservation Area's edge but lies outside the limits of the Site.

The 2017 Conservation Area Appraisal identifies '*the tree and hedge surroundings of the northern and central sections of the conservation area*' and '*the woodland area along the north edge of the conservation area*' as 'positive features'. This is considered to include the southern boundary element of the Site, where it overlaps with the Conservation Area. Consequently, this section of the Site is considered to make a positive contribution to the character and appearance of the Conservation Area.



Plate 16: Eastwards view from Wrotham Road (inside the Conservation Area) of the roadside entrance to the private access road, with the overgrown metal fence boundary to the left-hand-side and the Site beyond, and the 'wooded' area on the right-hand-side with the wider Conservation Area beyond (photograph taken March 2025).



Plate 17: North-westwards view looking along the western half of the southern boundary of the Site, comprising the fence and mixed vegetation (photograph taken March 2025).

6.18. The Site is also considered to comprise part of the surrounding fields that define the rural and somewhat separated character of the settlement. This rural setting is particularly evident when approaching or exiting the Conservation Area along Wrotham Road. Although views are partially screened by the tree-lined boundary, filtered glimpses into the Site are still afforded (Plate 18 & Plate 19).

6.19. The open nature of the Site allows for occasional and very filtered views of the Church tower through the intervening woodland belt (Plate 20). These views are not considered to strongly contribute to the Church's role as a local waymarker within or beyond the Conservation Area (the church is assessed separately below). Seasonal site visits

confirm that such views are significantly diminished when trees are in full leaf. This seasonal variation in vegetative screening between the Conservation Area and the Site is illustrated in Plate 21 and Plate 22.

6.20. There are also incidental glimpses from the Site into the Conservation Area which include the upper elements of the built form at Meopham Court; however, such views are not considered to contribute to the understanding and experience of this part of the Conservation Area (Plate 20).



Plate 18: North-eastwards view looking towards the Site from the northern edges of the Conservation Area, along Wrotham Road (photograph taken March 2025).



Plate 19: Southwards view along Wrotham Road, approaching the Conservation Area, with glimpses into the Site on the eastern side (photograph taken March 2025).



Plate 21: Westwards view looking along the southern boundary of the Site and northern boundary of the Conservation Area (photograph taken March 2025).



Plate 20: Southwards view overlooking the Site from the northern extent, with filtered glimpses of the Church tower (the right) and built form at Meopham Court (the left) (photograph taken March 2025).



Plate 22: Westwards view looking along the southern boundary of the Site and northern boundary of the Conservation Area (photograph taken June 2025).

6.21. The Appraisal notes that the '*hedged and tree enclosed fields around the conservation area, abutting its boundaries, provide most of it with an exceptional rural setting.*' The Site falls within this description. Therefore, based on both the Appraisal and the analysis outlined above, it is concluded that the Site makes a minor to moderate positive contribution to the heritage significance of Meopham The Street Conservation Area.

#### Parish Church of St John the Baptist

6.22. The Parish Church of St John the Baptist, c.200m south of the Site, was added to the National List at Grade I on 21<sup>st</sup> November 1966 (NHLE 1039866). The List Entry describes the building as follows:

*"1320-25 in the primacy of Simon de Mepham. Somewhat rebuilt after earthquake in 1326. Ragstone and flint. Large chancel. Lady Chapel (now vestry) 2 aisled nave. West tower, north and south porches. C19 restorations: reroofing 1858. Tower raised and chancel refurnished 1874. Interior has fine pulpit of 1682 from St Margarets Westminster. Wall tablets in chancel by R J Wyatt and E B Stephens and in north aisle to K Marten by T Beard 1750."*

6.23. A full copy of the List Entry is included at **Appendix 8**.

6.24. The Church is located on the eastern side of Wrotham Road, surrounded on all sides by its associated churchyard, where the asset can be best experienced. The churchyard is enclosed by mature vegetation on its northeastern, eastern and southern sides; although, the western side remains relatively open, allowing views of the

Church from Wrotham Road. A modern cemetery lies to the west of the Church on the western side of Wrotham Road.

6.25. Open fields surround the asset on its southern side which allows for longer-ranging glimpses of the Church from beyond the churchyard; however, the surrounding vegetation continues to obscure clear views of the asset (Plate 24).



Plate 23: Southeast view towards the Church from the surrounding churchyard (photograph taken March 2025).



Plate 24: Northwest view towards the Church from the surrounding open fields to the south of the Listed Building (photograph taken March 2025).

#### Statement of Significance

6.26. The Grade I Listing of the building highlights it is a heritage asset of the highest significance as defined by the NPPF.<sup>23</sup> This significance is consolidated by its inclusion within the boundaries of Meopham The Street Conservation Area.

6.27. The heritage significance of the Parish Church is principally embodied in its physical fabric which derives historic and architectural interest. The building is a material record of architectural ecclesiastical design from

several centuries and as a religious building it has been at the heart of the local community since the medieval period, the church will also have meaning for communities through both its spiritual and social role.

6.28. 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 church grounds which surround the church as well as the cemetery on the western side of Wrotham Road;
- The roadside position of the Church along Wrotham Road, which it shares a spatial and visual relationship with; and
- The historic settlement of Meopham, as encompassed by Meopham The Street Conservation Area, which the church served.

#### The contribution of the Site

The Church was not built to take advantage of any view from within it and the tower was not designed to be a viewing platform, with the tower lights being louvred and serving the bells. Furthermore, the grounds of the church have been lined with mature tree planting on its northern side and the wider surrounds is characterised with further

<sup>23</sup> MHCLG, NPPF, para. 213.

tree planting and additional built form. Therefore, there is no ability to see the Site from within the Church or its immediate grounds.

6.30. Within the Site, visibility of the Church is limited to filtered glimpses through the existing vegetation which surrounds the asset (Plate 25). Seasonal site visits confirm that such views are significantly diminished when trees are in full leaf (Plate 26). Therefore, the limited visual relationship between the Site and the Church is not considered to positively contribute to the overall understanding or experience of the asset.

6.31. Consequently, the Site is considered to form part of the heritage asset's setting which makes no contribution to the overall understanding and experience of the Listed Building.



Plate 25: Southwards view towards the Listed Church (outlined in red) from the eastern edges of the Site (photograph taken in March 2025).



Plate 26: Southwards view towards the Listed Church (approximate location indicated in red) from the north-eastern edges of the Site (photograph taken in June 2025)

## 7. Assessment of Impacts

7.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the applications for Outline Planning Permission for the residential development of the Site.

7.2. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission, including those for Listed Building Consent are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.

7.3. The statutory requirement set out in Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their settings. Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the asset, as well as the protection of the character and appearance of a Conservation Area.

7.4. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Conservation Areas, and this needs to be the primary consideration when determining the acceptability of the proposals.

7.5. It is also 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*.<sup>24</sup> With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.<sup>25</sup>

7.6. 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.<sup>26</sup>

7.7. 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.<sup>27</sup> In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

<sup>24</sup> MHCLG, *NPPF*, paras. 214 and 215.

<sup>25</sup> MHCLG, *NPPF*, para. 216.

<sup>26</sup> MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

<sup>27</sup> MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

***“...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.”<sup>28</sup>***

7.8. This Section will consider each of the heritage assets detailed above and assess the impact of the proposed development, whether that be harmful or beneficial to the significance identified above.

#### **Meopham The Street Conservation Area**

7.9. Paragraph 220 of the *NPPF* states that it is necessary to consider the relevant significance of the element of the Conservation Area which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e., would the application proposals undermine the significance of the Conservation Area as a whole?<sup>29</sup>

7.10. Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

7.11. The main area of development will be located across the central field area, leaving the stretch of land on the eastern side of the Site undeveloped. The latter will be managed as natural public open space, which will be enhanced with a community orchard, allotments, pedestrian walkways, scattered native trees and vegetation boundaries.

7.12. Regarding the small section of the Site’s southern boundary which overlaps with the northern boundary of the Conservation Area, this does not form any part of the proposed development and will be left unaffected. As such, the proposed development is expected to preserve the character and appearance of the Conservation Area.

7.13. In respect to the setting of the Meopham The Street Conservation Area, the proposed development will result in change to the rural character and appearance of the Site, which will be perceptible when leaving and approaching the Conservation Area from Wrotham Road. That being said the proposed development will be set back from the southern edge of the Site and this area will be kept as a natural buffer between the new development and the Conservation Area to the south. This buffer zone will be enhanced through the introduction of new tree planting and pedestrian walkways and cycle routes. These measures will help to retain elements of the rural character of the Site and mitigate the visual impact of the development on the rural setting of the Conservation Area, particularly when approached from the north along Wrotham Road. In addition, the area of the development closest to the Conservation Area will feature an informal frontage with lower density housing, further reducing its visual prominence and helping it to integrate more sensitively with the surrounding context.

7.14. Given the existing woodland to the north of the Conservation Area, the established vegetation boundaries, and the area’s overall enclosed character, the perception of noise and activity generated by the

<sup>28</sup> EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

<sup>29</sup> MHCLG, *NPPF*, para. 220.

development is not expected to have a detrimental impact on the understanding or experience of the heritage asset. Furthermore, vehicle routes will terminate at the southern edge of the development which will help mitigate the perception of any increase in activity.

7.15. The Conservation Area Appraisal identifies the effects of heavy traffic along Wrotham Road as a 'negative feature'. While the proposed development is expected to result in an increase in traffic along this route, any resulting harm to the setting, character, and appearance of the Conservation Area is anticipated to be low. Nevertheless, it is recognised that this cumulative effect will result in a low degree of harm.

7.16. Considering the impact to the overall significance of the Conservation Area through setting, the proposed development is expected to cause 'less than substantial harm' characterised as low to moderate. As per Paragraph 215 of the NPPF, this harm should be weighed against public benefits of the proposals.

**Parish Church of St John**

7.17. While views of the Church are identified within the Site, the limited ability to understand and experience the special interests of the asset from these locations is not considered to positively contribute to the setting of the Listed Building. The proposed development in the Site will reduce its open character and thus reduce the opportunity to view the Listed Building, albeit in already very filtered glimpses. That being said, the proposed development will incorporate a viewing corridor through the Site, which will create a designed view of the Listed Church, albeit in filtered views.

7.18. Overall, the proposed development of the Site is expected to cause no harm to the heritage significance of the Listed Building through changes to its setting.

## 8. Conclusions

8.1. Pegasus Group have been commissioned by Richborough to prepare a Heritage Statement and Archaeological Desk-Based Assessment to consider the proposed residential development at land to the east of Wrotham Road, Meopham, Gravesend, Kent, DA13 0JL.

8.2. Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

**Archaeological Resource**

8.3. No anomalies suggestive of significant archaeological remains of prehistoric date were recorded during the geophysical survey across the Site. Geological data suggests a possible paleochannel extends into the Site in the form of superficial head deposits. Numerous weakly enhanced linear, curvilinear and discrete anomalies have been detected across the Site by the geophysical survey, and these anomalies do not correspond with any mapped features. The potential for Palaeolithic archaeology within the Site is considered moderate.

8.4. Settlement activity dating from the late Neolithic to the early Romano-British periods was recorded some distance to the south of the Site. However, other instances of later-prehistoric archaeology recorded within the study area is limited to small surface or sub-surface finds. Therefore, the potential for significant later-prehistoric archaeology within the Site is considered low.

8.5. No anomalies suggestive of significant archaeological remains of Romano-British date were recorded during the geophysical survey across the Site. Archaeological evidence of significant settlement activity dating from the Romano-British period is low within the study area. Therefore, the potential for such archaeology within the Site is considered low.

8.6. No anomalies suggestive of significant archaeological remains of medieval date were recorded during the geophysical survey across the Site. Settlement activity within the wider study area appears to have increased during the early-medieval, medieval and late-medieval periods, as indicated by the presence of medieval built form recorded by the HER. During this time, the Site likely formed part of the wider rural landscape of these settlements, potentially being utilised for agricultural purposes. The presence of settlement activity within the Site from this period is unlikely, although, evidence of agricultural field systems may be present.

8.7. Based on the Tithe apportionment, it is understood that the Site formed part of the agricultural operations of Meopham Court during the 19<sup>th</sup> century. The Site has remained in agricultural use, mainly as arable land.

8.8. There is no evidence to suggest any built form was present within the Site during the modern period; any other archaeology would most likely be associated with the agricultural activity, and any such remains would be unlikely to be regarded as heritage assets.

## Built Heritage

- 8.9. Part of the southern boundary of the Site is shared with the northern boundary of *Meopham The Street Conservation Area*. There are no other designated heritage assets located within the Site.
- 8.10. Assets in the vicinity of the Site identified for further assessment comprised *Meopham The Street Conservation Area* and the Grade I Listed Parish Church of *St John*.
- 8.11. The proposed development is anticipated to cause 'less than substantial harm', characterised as low to moderate, to the heritage significance of the Meopham The Street Conservation Area through change to its setting. As per Paragraph 215 of the NPPF, this harm should be weighed against public benefits of the proposals.
- 8.12. Views of the Listed Church are identified within the Site; however, the limited ability to understand and experience the special interests of the asset from these locations is not considered to positively contribute to the setting of the Listed Building. Consequently, the proposed development is expected to cause no harm to the heritage significance of the Listed Building through changes to its setting.

## Sources

| Legislation  |
|--|
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Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> 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 | Tithe Map for the Parish of Meopham |
| 1895 | Ordnance Survey Map                 |
| 1962 | Ordnance Survey Map                 |

# Appendix 1: Gazetteer

## Heritage Data

### HER Event Data

| Ev UID   | Name  | Event Type                 |
|----------|---|----------------------------|
| EKE10967 | Desk-based assessment of an area of Meopham School  | DESK BASED ASSESSMENT      |
| EKE15381 | Evaluation report of land occupied by Meopham School, Wrotham Road, Meopham prior to redevelopment of the school buildings. | EVALUATION                 |
| EKE16421 | KCC Negative Result: ACCESS WATCHING-BRIEF REPORT SHEET   | WATCHING BRIEF             |
| EKE16445 | Meopham Library, Wrotham Road, Meopham, Kent, Archaeological evaluation   | TRIAL TRENCH               |
| EKE19233 | Meopham School, Wrotham Road, Meopham, Kent, strip, map and sample assessment   | POST EXCAVATION ASSESSMENT |
| EKE16551 | Meopham Secondary School, Wrotham Road, Kent, Archaeological desk-based assessment  | DESK BASED ASSESSMENT      |
| EKE3872  | WROTHAM ROAD  |                            |
| EKE9794  | Watching Brief at the Kinder Day Nursery, Meopham School, Meopham   | WATCHING BRIEF             |
| EKE21035 | Excavation near parish church, Meopham, 1988  | EXCAVATION                 |
| EKE21511 | Excavation at Meopham Sports Centre, 19993  | EXCAVATION                 |

HER Monument Data

| Mon UID  | Pref Ref     | Name   | Mon Type  | Period                                    |
|----------|--------------|--|---|---|
| MKE13832 | TQ 66 NW 59  | Old Forge Cottage  | HOUSE; HALL HOUSE; TIMBER FRAMED HOUSE; HOUSE; HOUSE                                      | Medieval to Modern                        |
| MKE13833 | TQ 66 NE 57  | Somers   | HOUSE; TIMBER FRAMED HOUSE; HOUSE   | Post Medieval to Modern                   |
| MKE1392  | TQ 66 NW 1   | St John the Baptist's Church, Wrotham Road, Meopham, Gravesham | CHURCH; PARISH CHURCH; PARISH CHURCH; PLAQUE; PARISH CHURCH; PARISH CHURCH; PARISH CHURCH | Medieval to Modern                        |
| MKE1399  | TQ 66 NW 8   | Prehistoric pits, Meopham                                      | PIT   | Iron Age                                  |
| MKE1433  | TQ 66 NW 42  | Sarsen Stone   | STANDING STONE  | Prehistoric or Roman                      |
| MKE1434  | TQ 66 NW 43  | Medieval coin hoard c 1369 or later                            | FINDSPOT  | Medieval                                  |
| MKE1436  | TQ 66 NW 45  | Late Iron Age and Romano-British Finds                         | SETTLEMENT?   | Early Iron Age to Roman                   |
| MKE1439  | TQ 66 NW 48  | Mesolithic site?   | FINDSPOT  | Mesolithic                                |
| MKE1447  | TQ 66 NW 56  | Group of Saxon wooden buildings                                | SETTLEMENT  | Early Medieval or Anglo-Saxon to Medieval |
| MKE27568 | TQ 66 NE 133 | BAILIFFS HOUSE   | SITE; HOUSE   | Post Medieval                             |
| MKE27570 | TQ 66 NE 126 | CAMER HOUSE  | HOUSE; SITE; HOUSE; HOUSE; HOUSE; MILITARY SUPPORT BUILDING                               | Post Medieval to Modern                   |
| MKE27572 | TQ 66 NW 102 | DORRINGTON COTTAGE   | SITE; TIMBER FRAMED HOUSE; HOUSE  | Post Medieval to Modern                   |

|          |              |   |   |                           |
|----------|--------------|---|---|---------------------------|
| MKE27573 | TQ 66 NW 99  | MELLIKER FARMHOUSE                                      | SITE; HOUSE; FARMHOUSE  | Post Medieval             |
| MKE27574 | TQ 66 NW 97  | MULBERRY HOUSE  | SITE; HOUSE   | Medieval to Post Medieval |
| MKE27575 | TQ 66 NW 105 | NORWOOD FARMHOUSE                                       | SITE; HOUSE; FARMHOUSE  | Post Medieval             |
| MKE27576 | TQ 66 NW 96  | WATERDITCH  | SITE; HOUSE; HOUSE  | Medieval to Post Medieval |
| MKE27584 | TQ 66 NW 104 | CHURCH COTTAGES   | SITE; TIMBER FRAMED HOUSE; CHURCH HOUSE                             | Post Medieval             |
| MKE27698 | TQ 66 NE 146 | 5 AND 6 CAMER STREET                                    | SITE; TIMBER FRAMED HOUSE; HOUSE                                    | Post Medieval             |
| MKE27699 | TQ 66 NE 154 | 9 AND 10 CAMER STREET                                   | SITE; TIMBER FRAMED HOUSE; HOUSE                                    | Post Medieval             |
| MKE27703 | TQ 66 NW 86  | THE WHITE HOUSE   | SITE; HOUSE   | Post Medieval             |
| MKE27704 | TQ 66 NW 85  | NEVILL HOUSE  | SITE; HOUSE; KITCHEN  | Post Medieval             |
| MKE27706 | TQ 66 NW 83  | WELL HOUSE  | TIMBER FRAMED HOUSE; SITE; HOUSE                                    | Post Medieval             |
| MKE27708 | TQ 66 NW 81  | EVENDEN FARMHOUSE                                       | SITE; TIMBER FRAMED HOUSE; HOUSE; FARMHOUSE                         | Post Medieval             |
| MKE27709 | TQ 66 NW 80  | THE GEORGE INN  | SITE; INN; INN  | Post Medieval             |
| MKE27778 | TQ 66 NE 127 | BUILDING APPROXIMATELY 30 METRES TO WEST OF CAMER HOUSE | SITE; BUILDING; GRANARY   | Post Medieval             |
| MKE27782 | TQ 66 NW 67  | HOOK GREEN FARMHOUSE                                    | SITE; TIMBER FRAMED HOUSE; VILLA; FARMHOUSE                         | Medieval to Post Medieval |
| MKE27785 | TQ 66 NW 70  | ELIZABETH HOUSE (THE POST OFFICE)                       | SITE; TIMBER FRAMED HOUSE; WORKHOUSE; WORKHOUSE; HOUSE; POST OFFICE | Post Medieval             |

|          |              |   |                           |                         |
|----------|--------------|---|---------------------------|-------------------------|
| MKE27845 | TQ 66 NE 172 | CAMER GREEN COTTAGE   | SITE; TIMBER FRAMED HOUSE | Post Medieval           |
| MKE41688 | TQ 66 NW 107 | 'The George' Second World War Home Guard Battle Headquarters, Wrotham Road, Meopham | BATTLE HEADQUARTERS       | Modern                  |
| MKE41690 | TQ 66 NW 115 | Graveney Lodge Second World War air raid wardens post, Wrotham Road, Meopham        | AIR RAID WARDENS POST     | Modern                  |
| MKE41712 | TQ 66 NW 112 | Meopham Second World War Vulnerable Point V8  | FORTIFICATION             | Modern                  |
| MKE41761 | TQ 66 NW 114 | Hook Green Second World War balloon barrage site                                    | BARRAGE BALLOON SITE      | Modern                  |
| MKE41778 | TQ 66 NW 111 | Meopham Village Hall Second World War headquarters, Meopham                         | MILITARY HEADQUARTERS     | Modern                  |
| MKE41939 | TQ 66 NW 118 | Green Lane Cold War telephone exchange bunker, Meopham, Kent                        | CIVIL DEFENCE BUILDING    | Unknown                 |
| MKE67378 | MKE67378     | Iron Age copper alloy coin  | FINDSPOT                  | Iron Age                |
| MKE67488 | MKE67488     | copper alloy token  | FINDSPOT                  | Post Medieval           |
| MKE77426 | TQ 66 NW 122 | Milestone on Wrotham Road, Meopham  | MILESTONE                 | Post Medieval to Modern |
| MKE77933 | TQ 66 NW 126 | George VI pillar box, Meopham School, Wrotham Road / Longfield Hill                 | PILLAR BOX                | Modern                  |
| MKE84174 | MKE84174     | Melliker Farm   | FARMSTEAD                 | Post Medieval           |
| MKE84176 | MKE84176     | Clements Reach Farm   | FARMSTEAD                 | Post Medieval           |
| MKE84177 | MKE84177     | Outfarm north west of Clements Reach  | FARMSTEAD                 | Post Medieval           |
| MKE84178 | MKE84178     | Lomers Farm   | FARMSTEAD                 | Post Medieval           |
| MKE84226 | MKE84226     | Outfarm south west of The Lances  | FARMSTEAD                 | Post Medieval           |

|          |              |  |            |               |
|----------|--------------|--|------------|---------------|
| MKE84227 | MKE84227     | Hook Green   | FARMSTEAD  | Post Medieval |
| MKE84228 | MKE84228     | Norwood Farm   | FARMSTEAD  | Post Medieval |
| MKE84232 | MKE84232     | Nevill House   | FARMSTEAD  | Post Medieval |
| MKE84233 | MKE84233     | Outfarm north of Waterditch  | FARMSTEAD  | Post Medieval |
| MKE84234 | MKE84234     | Farmstead in Hook Green  | FARMSTEAD  | Post Medieval |
| MKE84235 | MKE84235     | Foxendown Farm   | FARMSTEAD  | Post Medieval |
| MKE84236 | MKE84236     | Elizabeth House  | FARMSTEAD  | Post Medieval |
| MKE84307 | MKE84307     | Brimsole Farm (Brimstone Farm)   | FARMSTEAD  | Post Medieval |
| MKE84309 | MKE84309     | Camer Farm   | FARMSTEAD  | Post Medieval |
| MKE84310 | MKE84310     | Post-medieval outfarm north east of Camer Farm   | FARMSTEAD  | Post Medieval |
| MKE88576 | MKE88576     | Outfarm south west of The Lances   | FARMSTEAD  | Post Medieval |
| MKE88660 | MKE88660     | Evenden Farm   | FARMSTEAD  | Post Medieval |
| MKE88839 | MKE88839     | Outfarm south west of Hook Green   | FARMSTEAD  | Post Medieval |
| MKE91248 | TQ 66 NW 135 | Cropmark of a number of possible ring ditches, to the north of Foxendown Farm, Meopham | RING DITCH | Unknown       |
| MKE95446 | MKE95446     | Medieval Lead Alloy seal   | FINDSPOT   | Medieval      |
| MKE95448 | MKE95448     | Iron Age Copper alloy toggle   | FINDSPOT   | Roman         |

|           |              |   |                            |   |
|-----------|--------------|---|----------------------------|---|
| MKE98617  | TQ 66 NW 137 | Prehistoric features, Meopham School                            | DITCH; PIT; LINEAR FEATURE | Prehistoric                               |
| MKE106283 | TQ 66 NW 11  | St Paul's Roman Catholic church, Wrotham Road, Meopham          | PLACE OF WORSHIP           | Modern                                    |
| MKE110567 | MKE110567    | Post Medieval silver coin                                       | FINDSPOT                   | Medieval                                  |
| MKE110609 | MKE110609    | Medieval copper alloy mount                                     | FINDSPOT                   | Early Medieval or Anglo-Saxon to Medieval |
| MKE110610 | MKE110610    | Early Medieval lead gaming piece                                | FINDSPOT                   | Early Medieval or Anglo-Saxon to Medieval |
| MKE111929 | TQ 66 NW 141 | Site of the National School, Longfield Road, Meopham, Gravesend | NATIONAL SCHOOL            | Post Medieval                             |
| MKE114421 | TQ 66 NW 143 | Neolithic activity, Meopham School                              | PIT                        | Neolithic                                 |
| MKE114422 | TQ 66 NW 144 | Early / middle iron age boundary ditch, Meopham School          | BOUNDARY DITCH             | Early Iron Age to Middle Iron Age         |
| MKE114422 | TQ 66 NW 144 | Early / middle iron age boundary ditch, Meopham School          | BOUNDARY DITCH             | Early Iron Age to Middle Iron Age         |
| MKE115928 | TQ 66 NW 146 | Romano-British site, Meopham                                    | SITE                       | Roman                                     |
| MWX20789  | TQ 66 NW 62  | Meopham: surface-finds of several Palaeolithic handaxes         | FINDSPOT                   | Lower Palaeolithic to Middle Palaeolithic |
| MKE120866 | MKE120866    | Iron Age Copper alloy Coin                                      | FINDSPOT                   | Middle Iron Age                           |
| MKE120868 | MKE120868    | Post Medieval Copper alloy Medallion                            | FINDSPOT                   | Post Medieval                             |
| MKE120881 | MKE120881    | Roman Copper alloy Coin   | FINDSPOT                   | Roman                                     |
| MKE120884 | MKE120884    | Post Medieval Silver Coin                                       | FINDSPOT                   | Post Medieval                             |

|           |              |   |  |  |
|-----------|--------------|---|--|--|
| MKE123295 | TQ 66 NW 172 | Cropmarks of a possible Bronze Age ring ditch and a possible Later Prehistoric rectilinear enclosure, Meopham | ENCLOSURE; RING DITCH                                | Early Neolithic to Early Medieval or Anglo-Saxon |
| MKE123480 | TQ 66 NW 173 | Oast house at Hook Green farm, Meopham  | OASTHOUSE  | Post Medieval to Modern                          |
| MKE44041  | TQ 85 SE 300 | Chatham and Dover Railway   | RAILWAY  | Post Medieval                                    |
| MKE43971  | TQ 66 NE 201 | Camer Park, Meopham   | COUNTRY PARK; PUBLIC PARK                            | Post Medieval to Modern                          |
| MKE114423 | TQ 66 NW 144 | Late iron age / early Roman curvilinear ditch, Meopham School   | CURVILINEAR ENCLOSURE; POST HOLE; INHUMATION; QUARRY | Middle Iron Age to Roman                         |
| MKE126483 | MKE126483    | Dew pond (or sole pond), visible on 1st and 2nd edition OS map  | DEWPOND  | Post Medieval to Modern                          |
| MKE126484 | MKE126484    | Dew pond (or sole pond), visible on 1st and 2nd edition OS map  | DEWPOND  | Post Medieval to Modern                          |
| MKE126485 | MKE126485    | Dew pond (or sole pond), visible on 1st and 2nd edition OS map  | DEWPOND  | Post Medieval to Modern                          |

## Historic England Data

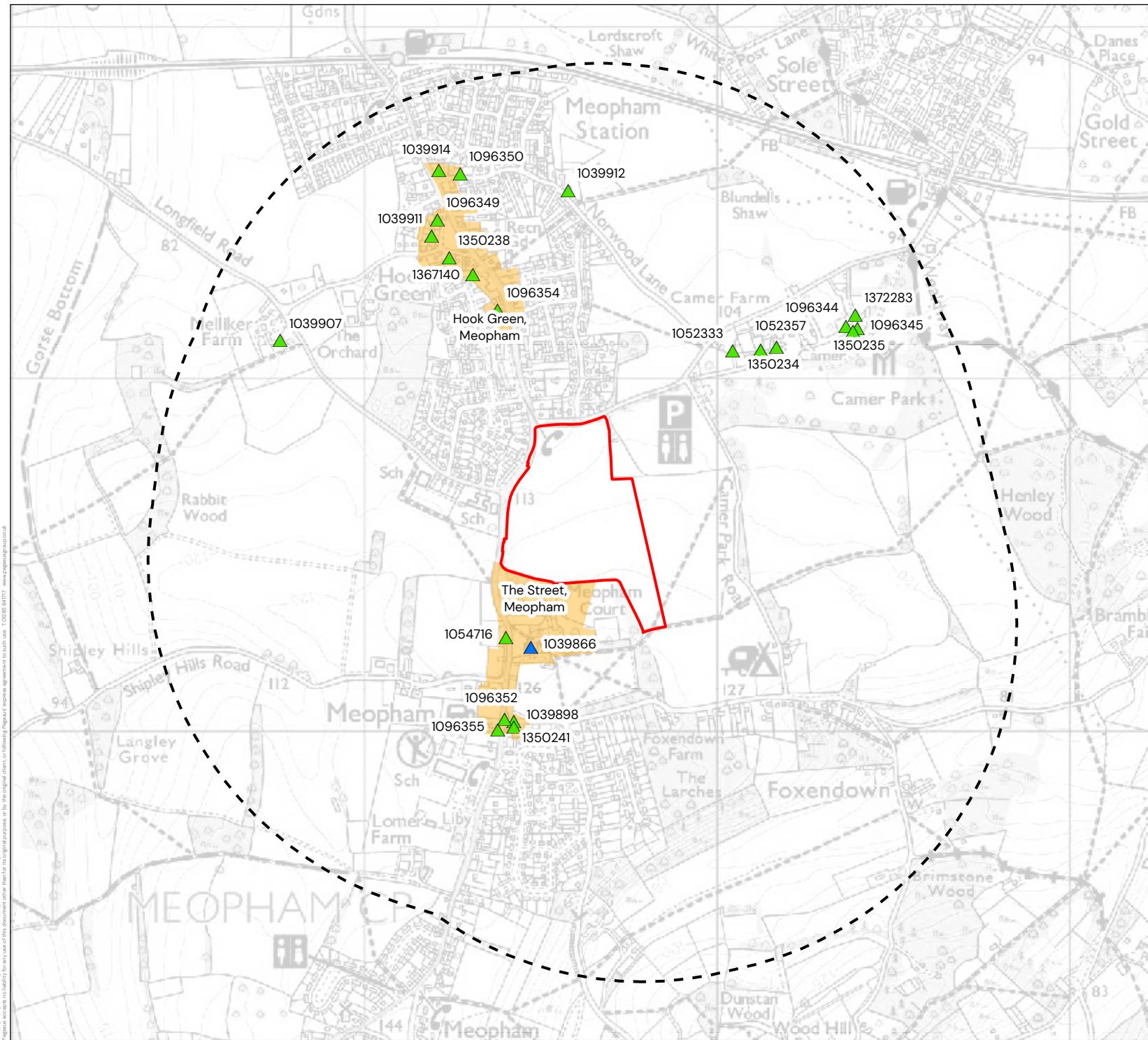
### Historic England Listed Buildings

| List Entry | Name                                 | Grade | Eastings | Northings |
|------------|--------------------------------------|-------|----------|-----------|
| 1039866    | PARISH CHURCH OF ST JOHN THE BAPTIST | I     | 564471   | 166240    |
| 1039898    | DORRINGTON COTTAGE                   | II    | 564423   | 166030    |
| 1039907    | MELLIKER FARMHOUSE                   | II    | 563760   | 167110    |
| 1039911    | MULBERRY HOUSE                       | II    | 564190   | 167407    |
| 1039912    | NORWOOD FARMHOUSE                    | II    | 564577   | 167535    |
| 1039914    | WATERDITCH                           | II    | 564210   | 167593    |
| 1052333    | BAILIFFS HOUSE                       | II    | 565044   | 167081    |
| 1052357    | CAMER HOUSE                          | II    | 565169   | 167092    |
| 1054716    | CHURCH COTTAGES                      | II    | 564400   | 166268    |
| 1096344    | 5 AND 6, CAMER STREET                | II    | 565365   | 167150    |
| 1096345    | 9 AND 10, CAMER STREET               | II    | 565398   | 167145    |
| 1096349    | THE WHITE HOUSE                      | II    | 564206   | 167453    |
| 1096350    | NEVILL HOUSE                         | II    | 564271   | 167583    |

|         |   |    |        |        |
|---------|---|----|--------|--------|
| 1096352 | WELL HOUSE  | II | 564397 | 166036 |
| 1096354 | EVENDEN FARMHOUSE                                       | II | 564377 | 167196 |
| 1096355 | THE GEORGE INN  | II | 564378 | 166006 |
| 1350234 | BUILDING APPROXIMATELY 30 METRES TO WEST OF CAMER HOUSE | II | 565124 | 167084 |
| 1350235 | SOMERS  | II | 565386 | 167137 |
| 1350238 | HOOK GREEN FARMHOUSE                                    | II | 564240 | 167345 |
| 1350241 | ELIZABETH HOUSE (THE POST OFFICE)                       | II | 564423 | 166014 |
| 1367140 | THE OLD FORGE<br>THE OLD FORGE COTTAGE                  | II | 564307 | 167297 |
| 1372283 | CAMER GREEN COTTAGE                                     | II | 565392 | 167182 |



## Appendix 2: Figures



## KEY

 Site Plan

1km Study Area

Conservation Area

## Listed Buildings

Grade

Grade II

A 22.09.25 FIGURE

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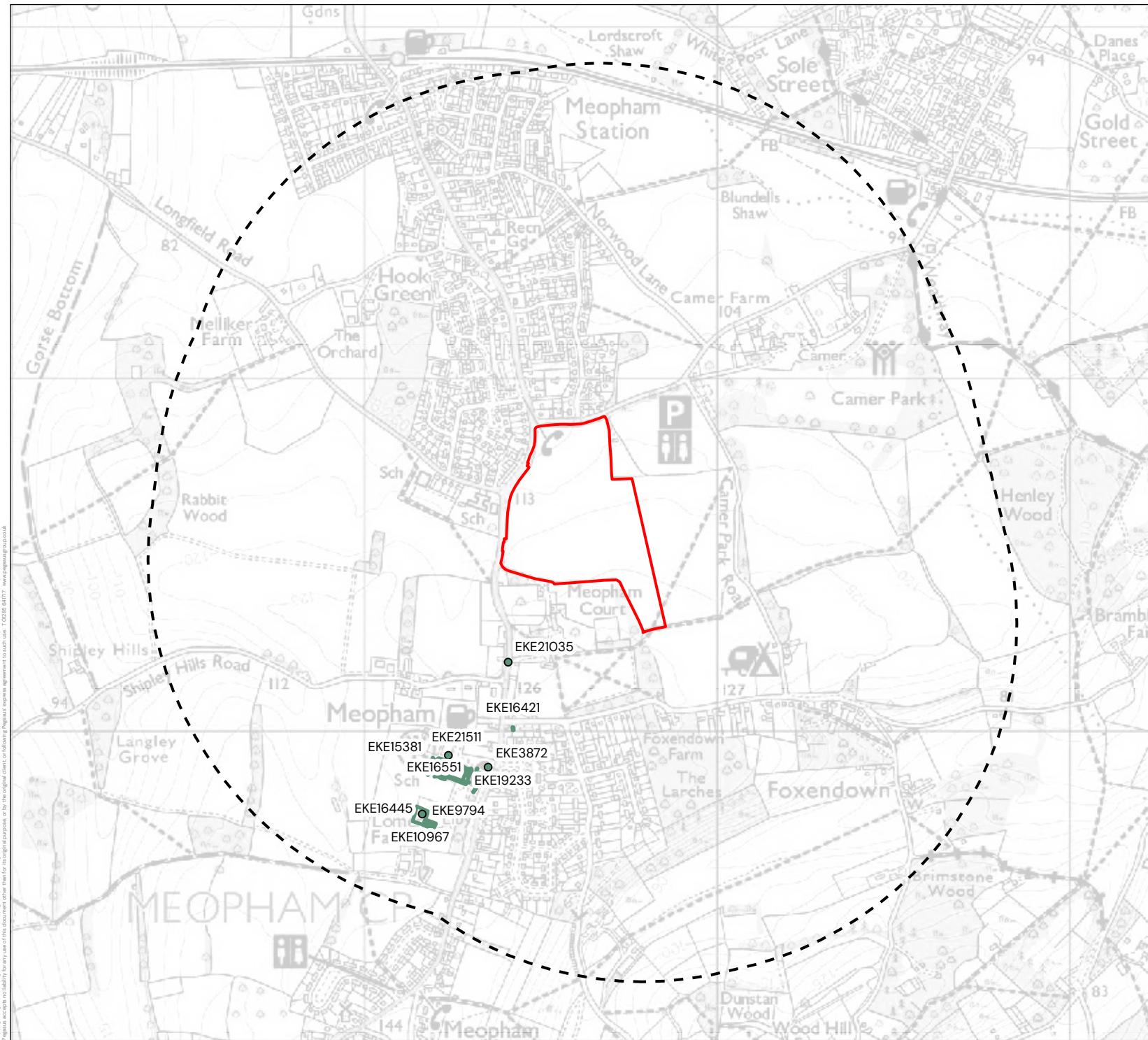
**FIGURE 1: DESIGNATED HERITAGE ASSETS**

#### FIGURE 1. DESIGNATED HERITAGE AREA

|                    |                      |             |                |
|--------------------|----------------------|-------------|----------------|
| DATE<br>22/09/2025 | SCALE<br>1:15,005@A3 | DRAWN<br>HP | APPROVED<br>GS |
| SHEET              | REV                  | N<br>①      | 0<br>0.2 KM    |

DRAWING NUMBER  
D001V1 B25-0095 HT

PEGASUS  
GROUP



## KEY

 Site Plan

1km Study Area

### Event Line

● Event Point

Event Polygon

A 22.09.25 FIGURE

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**FIGURE 2: HER 'EVENT' DATA**

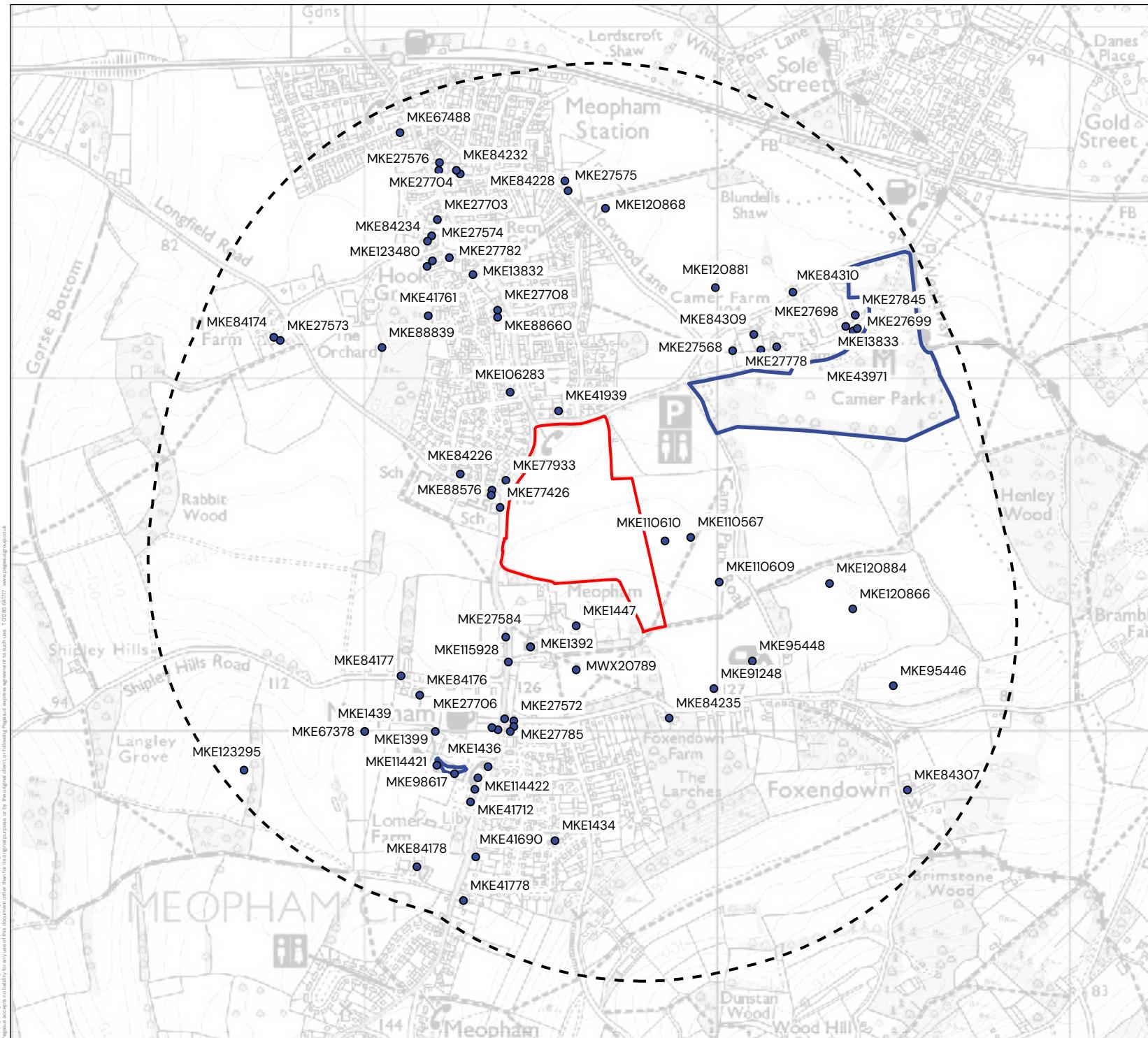
#### FIGURE 2. HER EVENT DATA

| DATE       | SCALE       | DRAWN  | APPROVED |
|------------|-------------|--------|----------|
| 22/09/2025 | 1:15,005@A3 | HP     | GS       |
| SHEET      | REV         | N<br>1 | 0.2 KM   |

D02 A

---

DRAWING NUMBER  
D002V1\_B25-0085 HT



## KEY

Site Plan

1km Study Area

8 MARCH 2010

● Monuments Point

A 22.09.25 FIGURE

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FIGURE 3: HER 'MONUMENT' DATA

### FIGURE 8. HER MONUMENT

| DATE       | SCALE       | DRAWN  | APPROVED |
|------------|-------------|--------|----------|
| 22/09/2025 | 1:15,005@A3 | HP     | GS       |
| SHEET      | REV         | N<br>① | 0.2 KM   |

---

DRAWING NUMBER  
D002V1\_B25-0095 HT



KE

Site Plan

DTM LiDAR:  
Azimuth: 90  
Altitude: 45  
Z Factor: 20

A 22.09.25 FIGURE

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**FIGURE 4: DIGITAL TERRAIN MODEL LIDAR DATA**  
Land to the east of Wrotham Road,  
Meopham

|                    |                     |             |                |
|--------------------|---------------------|-------------|----------------|
| DATE<br>22/09/2025 | SCALE<br>1:3,412@A3 | DRAWN<br>HP | APPROVED<br>GS |
| SHEET              | REV<br>N            | 0           | 0.1 KM         |

04

PEGASUS  
GROUP

## 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."***<sup>30</sup>

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.<sup>31</sup>

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*.<sup>32</sup> These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.<sup>33</sup>

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.<sup>34</sup>

<sup>30</sup> MHCLG, *NPPF*, Annex 2.

<sup>31</sup> Historic England, *GPA:2*.

<sup>32</sup> 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.

<sup>33</sup> MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

<sup>34</sup> 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.<sup>35</sup>

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."*<sup>36</sup>**

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."*<sup>37</sup>**

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".<sup>38</sup>

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

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<sup>35</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

<sup>36</sup> MHCLG, *NPPF*, Annex 2.

<sup>37</sup> MHCLG, *NPPF*, Annex 2.

<sup>38</sup> 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.”<sup>39</sup>***

<sup>39</sup> Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

<sup>40</sup> MHCLG, NPPF, para. 213 and fn. 75.

## **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;<sup>40</sup>
- **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);<sup>41</sup> and

<sup>41</sup> 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*".<sup>42</sup>
- **Less than substantial harm.** Harm of a lesser level than that defined above.

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/weighing 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*",<sup>43</sup> and

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."*<sup>44</sup>**

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*".<sup>45</sup>

<sup>42</sup> MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

<sup>43</sup> Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

<sup>44</sup> MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

<sup>45</sup> 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*".<sup>46</sup> 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*".<sup>47</sup> Of particular relevance is the checklist given on page 13 of GPA:3.<sup>48</sup>

It should be noted that this key document also states:

***"Setting is not itself a heritage asset, nor a heritage designation..."***<sup>49</sup>

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".***<sup>50</sup>

<sup>46</sup> Historic England, GPA:2, p. 9.

<sup>47</sup> Historic England, GPA:3, p. 8.

<sup>48</sup> Historic England, GPA:3, p. 13.

<sup>49</sup> Historic England, GPA:3, p. 4.

<sup>50</sup> Historic England, GPA 3., p. 8.

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.<sup>51</sup>

### **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.<sup>52</sup>

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.<sup>53</sup>

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).***

<sup>51</sup> Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

<sup>52</sup> MHCLG, NPPF, paras. 214 and 215.

<sup>53</sup> 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.

***Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***

***Examples of heritage benefits may include:***

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.*<sup>54</sup>**

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.

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<sup>54</sup> 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.<sup>55</sup> 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."***<sup>56</sup>

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."***<sup>57</sup>

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.<sup>58</sup>

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."***<sup>59</sup>

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.

<sup>55</sup> UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*.

<sup>56</sup> UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*, Section 66(1).

<sup>57</sup> *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others* [2014] EWCA Civ 137, para. 24.

<sup>58</sup> *Jones v Mordue* [2015] EWCA Civ 1243.

<sup>59</sup> 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.<sup>60</sup>

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<sup>60</sup> 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.”<sup>61</sup>*

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.”<sup>62</sup> (our emphasis)*

The NPPF continues to recognise that the planning system is planned 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*

<sup>61</sup> MHCLG, NPPF, para. 11.

<sup>62</sup> MHCLG, NPPF, para. 11, fn. 7.

***assets and assets identified by the local planning authority (including local listing).<sup>63</sup>***

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."<sup>64</sup>***

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."<sup>65</sup>***

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."<sup>66</sup>***

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."<sup>67</sup>***

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***

<sup>63</sup> MHCLG, NPPF, Annex 2.

<sup>64</sup> MHCLG, NPPF, Annex 2.

<sup>65</sup> MHCLG, NPPF, Annex 2.

<sup>66</sup> MHCLG, NPPF, para. 208.

<sup>67</sup> 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.”<sup>68</sup>*

*“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.”<sup>69</sup>*

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.”<sup>70</sup>*

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.”<sup>71</sup>*

<sup>68</sup> MHCLG, NPPF, para. 212.

<sup>69</sup> MHCLG, NPPF, para. 213.

<sup>70</sup> MHCLG, NPPF, para. 214.

<sup>71</sup> 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."*<sup>72</sup>**

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."*<sup>73</sup> (our emphasis)**

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.

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."*<sup>74</sup>**

<sup>72</sup> MHCLG, NPPF, para 219.

<sup>73</sup> MHCLG, NPPF, para. 220.

<sup>74</sup> MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

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."<sup>75</sup> (our emphasis)*

National Design Guide:

<sup>75</sup> MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

<sup>76</sup> MHCLG, NDG, para. 46.

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."<sup>76</sup>*

*"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."<sup>77</sup>*

It goes on to state that:

*"Well-designed places and buildings are influenced positively by:*

- *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*

<sup>77</sup> MHCLG, NDG, para. 47.



*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 21<sup>st</sup> century.*<sup>78</sup>

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<sup>78</sup> MHCLG, NDG, paras. 48–49.

## Appendix 6: Relevant Development Plan Policies

Applications for Planning Permission within Gravesham are currently considered against the policy and guidance set out within the Gravesham Local Plan Core Strategy (2014).

Policy CS20: *Heritage and the Historic Environment* states as follows:

***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."***

Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 – Stage 2) Consultation

The Site has been allocated for potential new development in the emerging Regulation 18 Stage 2 Consultation Part 1: Local Plan core strategy partial review and site allocations document (October 2020).

The Site is allocated under *GBS-D Land to the south of Green Lane and east of Wrotham Road, Hook Green, Meopham*, with a developable area of 11.6925 ha for approximately 350 dwellings.



## Appendix 7: Geophysical Survey Report (Magnitude, 2025)



**magnitude  
surveys**



**Geophysical Survey  
of  
Land at Wrotham Road, Meopham**

**For  
Pegasus Planning Group Limited  
On Behalf Of  
Richborough**

**Magnitude Surveys Ref: MSTQ2012**

**July 2025**



## **magnitude surveys**

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**Issue Date:**

16 July 2025

### **Abstract**

Magnitude Surveys was commissioned to assess the subsurface archaeological potential of a c. 21ha area of land at Wrotham Road, Meopham, Kent. A fluxgate gradiometer survey was successfully completed; the geophysical survey has detected anomalies of natural and undetermined origins. Natural variations have been recorded in the centre of the survey area, likely associated with accretions in superficial head deposits and chalk bedrock weathering. Anomalies have been detected throughout the survey area that have been classified as undetermined for which archaeological origins cannot be discounted. Modern interference is limited to the edges and isolated areas within the centre of the survey area, caused by extant field boundaries and ferrous debris.

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## 1. Introduction

- 1.1. Magnitude Surveys Ltd (MS) was commissioned by Pegasus Planning Group Limited on behalf of Richborough to undertake a geophysical survey over a c. 21ha area of land at Wrotham Road, Meopham, Kent (TQ 64570 66652).
- 1.2. The geophysical survey comprised hand-carried GNSS-positioned fluxgate gradiometer survey. Magnetic survey is the standard primary geophysical method for archaeological applications in the UK due to its ability to detect a range of different features. The technique is particularly suited for detecting fired or magnetically enhanced features, such as ditches, pits, kilns, sunken featured buildings (SFBs) and industrial activity (David *et al.*, 2008).
- 1.3. The survey was conducted in line with the current best practice guidelines produced by Historic England (David *et al.*, 2008), the Chartered Institute for Archaeologists (ClfA, 2020) and the European Archaeological Council (Schmidt *et al.*, 2015).
- 1.4. It was conducted in line with a Written Scheme of Investigation (WSI) produced by MS (Marr, 2025).
- 1.5. The survey commenced on 24<sup>th</sup> March 2025 and took four days to complete.

## 2. Quality Assurance

- 2.1. Magnitude Surveys is a Registered Organisation of the Chartered Institute for Archaeologists (ClfA), the chartered UK body for archaeologists, and a corporate member of ISAP (International Society for Archaeological Prospection).
- 2.2. The directors of MS are involved in cutting edge research and the development of guidance/policy. Specifically, Dr Chrys Harris has a PhD in archaeological geophysics from the University of Bradford, is a Member of ClfA and is the Vice-Chair of the International Society for Archaeological Prospection (ISAP); Finnegan Pope-Carter has an MSc in archaeological geophysics and is a Fellow of the London Geological Society, as well as a member of GeoSIG (ClfA Geophysics Special Interest Group); Dr Paul Johnson has a PhD in archaeology from the University of Southampton, is a Fellow of the Society of Antiquaries of London and a Member of ClfA, has been a member of the ISAP Management Committee since 2015, and is currently the nominated representative for the EAA Archaeological Prospection Community to the board of the European Archaeological Association.
- 2.3. All MS managers, field and office staff have degree qualifications relevant to archaeology or geophysics and/or field experience.

## 3. Objectives

- 3.1. The objective of this geophysical survey was to assess the subsurface archaeological potential of the survey area.

## 4. Geographic Background

4.1. The survey area was located c. 50m south of Hook Green, Meopham, Kent (Figure 1). Gradiometer survey was undertaken across three fields under arable cultivation. The western survey area was bordered by the B260 to the north, The Helen Allison School to the east, and further agricultural fields on all other sides. The two eastern survey areas were bordered by Green Lane to the north, agricultural fields to the east and south, and the A227 to the west (Figure 2).

4.2. Survey considerations:

| Survey Area | Ground Conditions   | Further Notes  |
|-------------|---|--|
| 1           | Undulating arable field containing well established Oilseed Rape crop | The survey area was bordered by a grass verge and B260 to the north. Steel fencing formed the eastern boundary. No physical boundary was present to the south and west, and trees and hedges comprised the northwest border. |
| 2           | Flat arable field containing well established Oilseed Rape crop       | The survey area was bordered by trees and hedges to the north, east, southwest and west. Wooden fencing and residential properties were present to the northeast. Metal wire fencing formed the southern boundary.           |
| 3           | Flat arable field containing well established Oilseed Rape crop       | The survey area was bordered by metal wire fencing to the north. No physical boundary was present to the east. Trees and hedges formed the south and western borders.  |

4.3. The underlying geology comprises chalk from the Lewes Nodular Chalk Formation, Seaford Chalk Formation and Newhaven Chalk Formation to the north of Areas 1 and 2. Sand from the Thanet Formation comprised the underlying geology for the remainder of the survey area. Superficial head deposits consisting of clay, silt sand and gravel are present to the north of Area 2 (British Geological Survey, 2025).

4.4. The soils consist of slightly acid loamy and clayey soils with impeded drainage throughout centre of Area 1, the east of Area 2 and the entirety of Area 3. Shallow lime-rich soils over chalk or limestone are present to the eastern and western extents of Area 1, and the western extent of Area 2 (Soilscapes, 2025).

## 5. Archaeological Background

5.1. The following is a summary of a Heritage Statement (Payne, 2025) produced and provided by Pegasus Planning Group Limited.

5.2. The HER lists no designated assets of archaeological significance within the survey areas. Previous archaeological works, including desk-based assessments and watching briefs, reported no archaeological assets from the Prehistoric to Modern period recorded within the survey areas.

5.3. Evidence of occupation from the late Neolithic to the early Romano-British period was recorded during excavations c. 600-680m south of the survey areas (MKE1436), including a curvilinear ditch containing large amounts of late Iron Age to early Romano-British pottery and a child inhumation (MKE114423), various pits (MKE114421), boundary ditches and a potential flint trackway (MKE98617, MKE114422). A possible Bronze Age ring ditch and potentially later prehistoric rectilinear enclosure are visible on aerial photography (MKE123295) located c. 780m southwest of Area 1.

5.4. The HER denotes a Romano-British site located c. 270m south of Areas 2 & 3 (MKE115928).

5.5. Two metal detecting findspots c. 60m and c. 180m east of Area 3 contained an early Medieval game piece and a Medieval copper alloy mount (MKE110610, MKE110609). Primary source information indicates settlement activity during the late Anglo-Saxon period located c. 120m south of Areas 2 & 3 (MKE1447). The Medieval Grade I Listed Parish Church of St John the Baptist was located c. 200m south of Areas 2 & 3 (MKE1392).

## 6. Methodology

### 6.1. Data Collection

6.1.1. Magnetometer surveys are generally the most cost effective and suitable geophysical technique for the detection of archaeology in England. Therefore, a magnetometer survey should be the preferred geophysical technique unless its use is precluded by any specific survey objectives or the site environment. For this site, no factors precluded the recommendation of a standard magnetometer survey. Geophysical survey therefore comprised the magnetic method as described in the following section.

6.1.2. Geophysical prospection comprised the magnetic method as described in the following table.

6.1.3. Table of survey strategies:

| Method   | Instrument  | Traverse Interval | Sample Interval             |
|----------|---|-------------------|-----------------------------|
| Magnetic | Bartington Instruments Grad-13 Digital Three-Axis Gradiometer | 1m                | 200Hz reprojected to 0.125m |

6.1.4. The magnetic data were collected using MS' bespoke hand-carried GNSS-positioned system.

6.1.4.1. MS' hand-carried system was comprised of Bartington Instruments Grad 13 Digital Three-Axis Gradiometers. Positional referencing was through a multi-channel, multi-constellation GNSS Smart Antenna RTK GPS outputting in NMEA mode to ensure high positional accuracy of collected measurements. The RTK GPS is accurate to 0.008m + 1ppm in the horizontal and 0.015m + 1ppm in the vertical.

- 6.1.4.2. Magnetic and GPS data were stored on an SD card within MS' bespoke datalogger. The datalogger was continuously synced, via an in-field Wi-Fi unit, to servers within MS' offices. This allowed for data collection, processing and visualisation to be monitored in real-time as fieldwork was ongoing.
- 6.1.4.3. A navigation system was integrated with the RTK GPS, which was used to guide the surveyor. Data were collected by traversing the survey area along the longest possible lines, ensuring efficient collection and processing.

## 6.2. Data Processing

- 6.2.1. Magnetic data were processed in bespoke in-house software produced by MS. Processing steps conform to the EAC and Historic England guidelines for 'minimally enhanced data' (see Section 3.8 in Schmidt *et al.*, 2015: 33 and Section IV.2 in David *et al.*, 2008: 11).

Sensor Calibration – The sensors were calibrated using a bespoke in-house algorithm, which conforms to Olsen *et al.* (2003).

Zero Median Traverse – The median of each sensor traverse is calculated within a specified range and subtracted from the collected data. This removes striping effects caused by small variations in sensor electronics.

Projection to a Regular Grid – Data collected using RTK GPS positioning requires a uniform grid projection to visualise data. Data are rotated to best fit an orthogonal grid projection and are resampled onto the grid using an inverse distance-weighting algorithm.

Interpolation to Square Pixels – Data are interpolated using a bicubic algorithm to increase the pixel density between sensor traverses. This produces images with square pixels for ease of visualisation.

## 6.3. Data Visualisation and Interpretation

- 6.3.1. This report presents the gradient of the sensors' total field data as greyscale images (Figures 5, 8 & 11). The gradient of the sensors minimises external interferences and reduces the blown-out responses from ferrous and other high contrast material. However, the contrast of weak or ephemeral anomalies can be reduced through the process of calculating the gradient. Consequently, some features can be clearer in the respective gradient or total field datasets. Multiple greyscale images of the gradient and total field at different plotting ranges have been used for data interpretation. Greyscale images should be viewed alongside the XY trace plot (Figures 7, 10 & 13). XY trace plots visualise the magnitude and form of the geophysical response, aiding anomaly interpretation.
- 6.3.2. Geophysical results have been interpreted using greyscale images and XY traces in a layered environment, overlaid against open street maps, satellite imagery, historical maps, LiDAR data, and soil and geology maps. Satellite Imagery (Google Earth, 2025) was also consulted, to compare the results with recent land use.

6.3.3. Geodetic position of results – All vector and raster data have been projected into OSGB36 (ESPG27700) and can be provided upon request in ESRI Shapefile (.SHP) and Geotiff (.TIF) respectively. Figures are provided with raster and vector data projected against OS Open Data.

## 7. Results

### 7.1. Qualification

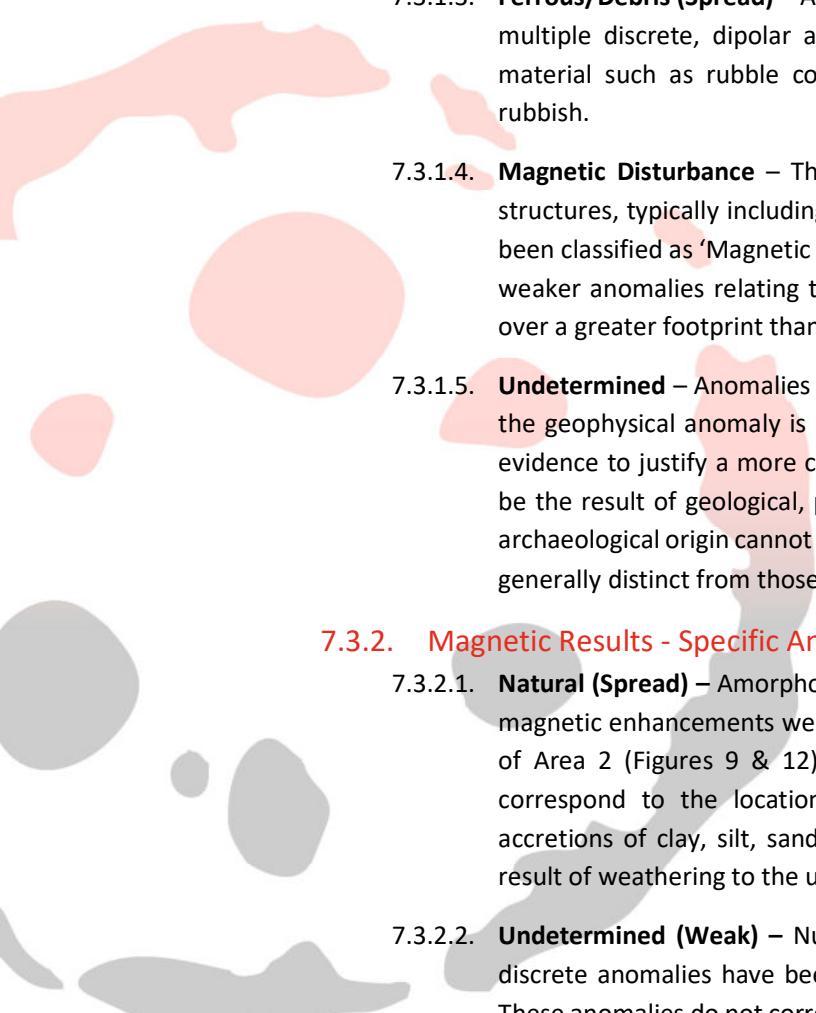
7.1.1. Geophysical results are not a map of the ground and are instead a direct measurement of subsurface properties. Detecting and mapping features requires that said features have properties that can be measured by the chosen technique(s) and that these properties have sufficient contrast with the background to be identifiable. The interpretation of any identified anomalies is inherently subjective. While the scrutiny of the results is undertaken by qualified, experienced individuals and rigorously checked for quality and consistency, it is often not possible to classify all anomaly sources. Where possible, an anomaly source will be identified along with the certainty of the interpretation. The only way to improve the interpretation of results is through a process of comparing excavated results with the geophysical reports. MS actively seek feedback on their reports, as well as reports from further work, in order to constantly improve our knowledge and service.

### 7.2. Discussion

- 7.2.1. The geophysical results are presented in combination with satellite imagery and historical maps (Figure 4).
- 7.2.2. The fluxgate gradiometer survey responded well to the environment of the survey area. The geophysical survey has identified anomalies of a natural origin. Magnetic disturbance is generally limited to the edges of fields, and in isolated areas containing ferrous debris. Increased geophysical noise was recorded in some areas due to sensor-crop collision.
- 7.2.3. Several anomalous spreads were detected in Area 2 (Figures 9 & 12). The spreads detected to the north of Area 2 likely result from accretions of superficial deposits of clay, silt, sand and gravel. The southern spread is likely due to the weathering of the underlying chalk bedrock.
- 7.2.4. Several weakly enhanced, linear, curvilinear and discrete anomalies have been detected within Areas 1-3 and categorised as undetermined (Figures 6, 9 & 12). Due to a limited context and a lack of clear anthropogenic patterns or morphologies a more confident interpretation cannot be provided, though an archaeological provenance cannot be discounted.

## 7.3. Interpretation

### 7.3.1. General Statements



- 7.3.1.1. Geophysical anomalies will be discussed broadly as classification types across the survey area. Only anomalies that are distinctive or unusual will be discussed individually.
- 7.3.1.2. **Ferrous (Spike)** – Discrete dipolar anomalies are likely to be the result of isolated pieces of modern ferrous debris on or near the ground surface.
- 7.3.1.3. **Ferrous/Debris (Spread)** – A ferrous/debris spread refers to a concentration of multiple discrete, dipolar anomalies usually resulting from highly magnetic material such as rubble containing ceramic building materials and ferrous rubbish.
- 7.3.1.4. **Magnetic Disturbance** – The strong anomalies produced by extant metallic structures, typically including fencing, pylons, vehicles and service pipes, have been classified as 'Magnetic Disturbance'. These magnetic 'haloes' will obscure weaker anomalies relating to nearby features, should they be present, often over a greater footprint than the structure causing them.
- 7.3.1.5. **Undetermined** – Anomalies are classified as Undetermined when the origin of the geophysical anomaly is ambiguous and there is no supporting contextual evidence to justify a more certain classification. These anomalies are likely to be the result of geological, pedological or agricultural processes, although an archaeological origin cannot be entirely ruled out. Undetermined anomalies are generally distinct from those caused by ferrous sources.

### 7.3.2. Magnetic Results - Specific Anomalies

- 7.3.2.1. **Natural (Spread)** – Amorphous and curvilinear anomalies with weakly positive magnetic enhancements were detected throughout the north, south and west of Area 2 (Figures 9 & 12). The spreads identified in the north of Area 2 correspond to the location of superficial deposits and are likely due to accretions of clay, silt, sand and gravel. The southernmost spread is likely a result of weathering to the underlying chalk bedrock.
- 7.3.2.2. **Undetermined (Weak)** – Numerous weakly enhanced linear, curvilinear and discrete anomalies have been detected across Areas 1-3 (Figures 6, 9 & 12). These anomalies do not correspond with any mapped features meaning a more definite classification cannot be given.
- 7.3.2.3. **Agricultural (Trend)** – Linear trends were detected that are attributed to modern ploughing regimes in Areas 1 and 3 (Figures 9 & 12). Only a representative sample of modern ploughing has been drawn.

## 8. Conclusions

- 8.1. A fluxgate gradiometer survey was successfully completed across the survey area and has detected anomalies of natural and undetermined origins. Modern interference was limited to the edges and isolated areas within the survey area, attributed to extant field boundaries and ferrous debris.
- 8.2. Anomalous spreads were detected within Area 2. These are likely related to accretions of superficial head deposits and weathering of the underlying chalk bedrock.
- 8.3. Multiple linear, curvilinear and discrete anomalies have been classified as 'undetermined' due to a lack of context, or any clear pattern which would enable a confident interpretation, though an archaeological provenance cannot be discounted.

## 9. Archiving

- 9.1. MS maintains an in-house digital archive, which is based on Schmidt and Ernenwein (2013). This stores the collected measurements, minimally processed data, georeferenced and un-georeferenced images, XY traces and a copy of the final report.
- 9.2. MS contributes reports to the ADS Grey Literature Library upon permission from the client, subject to any dictated time embargoes.

## 10. Copyright

- 10.1. Copyright and intellectual property pertaining to all reports, figures and datasets produced by Magnitude Services Ltd is retained by MS. The client is given full licence to use such material for their own purposes. Permission must be sought by any third party wishing to use or reproduce any IP owned by MS.

## 11. References

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Schmidt, A., Linford, P., Linford, N., David, A., Gaffney, C., Sarris, A. and Fassbinder, J., 2015. Guidelines for the use of geophysics in archaeology: questions to ask and points to consider. EAC Guidelines 2. European Archaeological Council: Belgium.

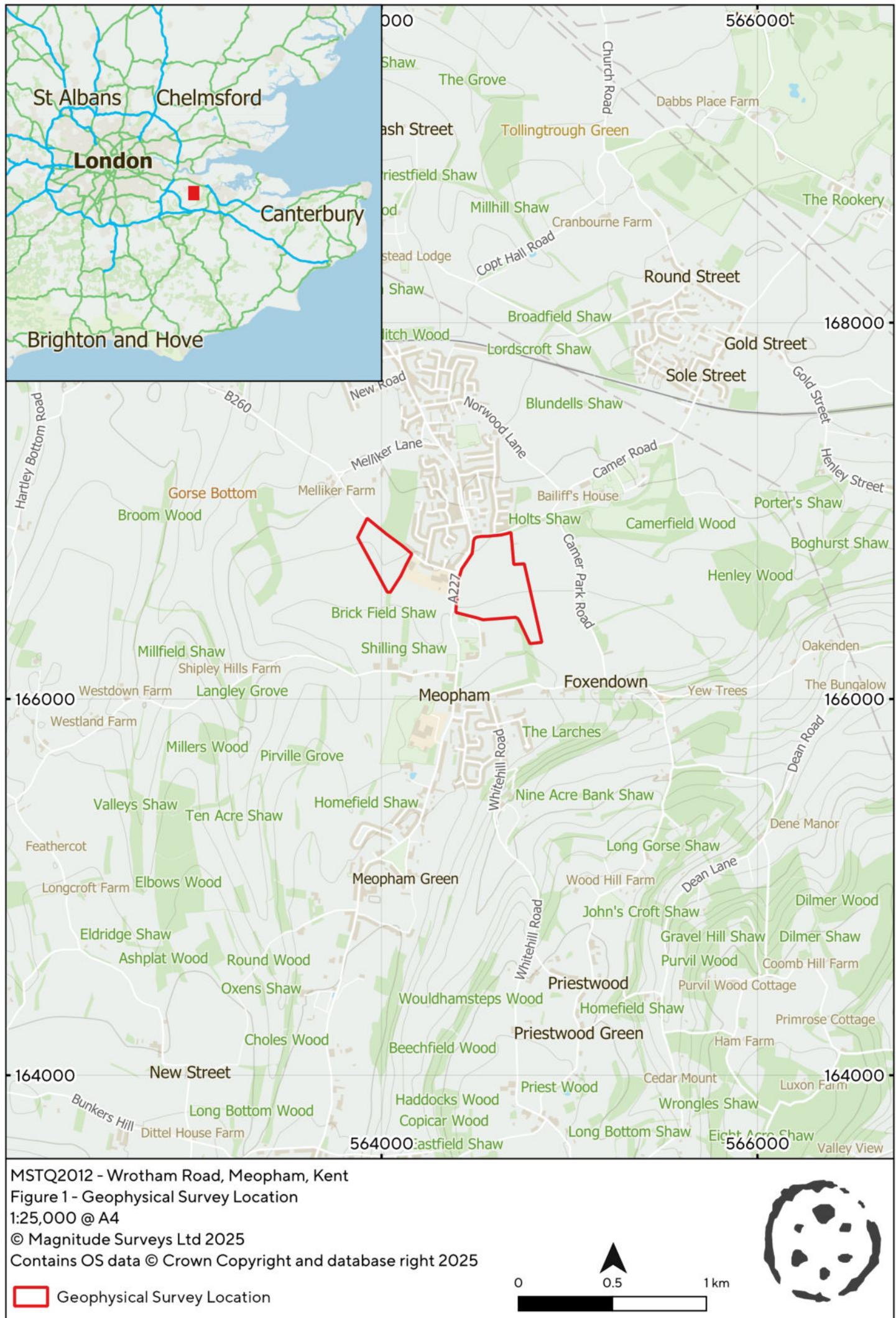
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[<http://landis.org.uk>]. Accessed 01/04/2025.

## 12. Project Metadata

|                   |   |
|-------------------|---|
| MS Job Code       | MSTQ2012  |
| Project Name      | Geophysical Survey of Land at Wrotham Road, Meopham |
| Client            | Pegasus Planning Group Limited                      |
| Grid Reference    | TQ 64570 66652                                      |
| Survey Techniques | Magnetometry  |
| Survey Size (ha)  | 21ha (Magnetometry)                                 |
| Survey Dates      | 2025-03-24 to 2025-03-27                            |
| Project Lead      | Dan Byrne MGeophys (Hons)                           |
| Project Officer   | Dan Byrne MGeophys (Hons)                           |
| HER Event No      | TBC   |
| OASIS No          | TBC   |
| S42 Licence No    | TBC   |
| Report Version    | 1.0   |

## 13. Document History

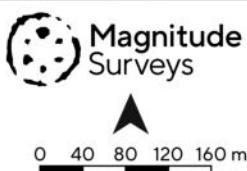
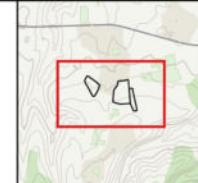
| Version | Comments                              | Author | Checked By | Date          |
|---------|---------------------------------------|--------|------------|---------------|
| 0.1     | Initial Draft -Project Lead Review    | WS     | DB         | 01 April 2025 |
| 0.2     | Second Draft – Management Review      | WS     | DB         | 03 April 2025 |
| 0.3     | Management Approval                   | WS     | GA         | 04 April 2025 |
| 0.4     | Addition of Archaeological Background | AH     | DB         | 01 July 2025  |
| 1.0     | Final Issue                           | DN     | DB         | 16 July 2025  |





MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 2 - Geophysical Survey Areas  
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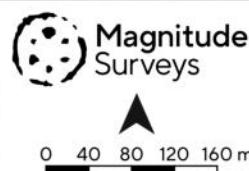
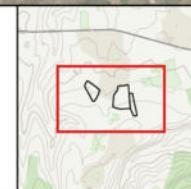
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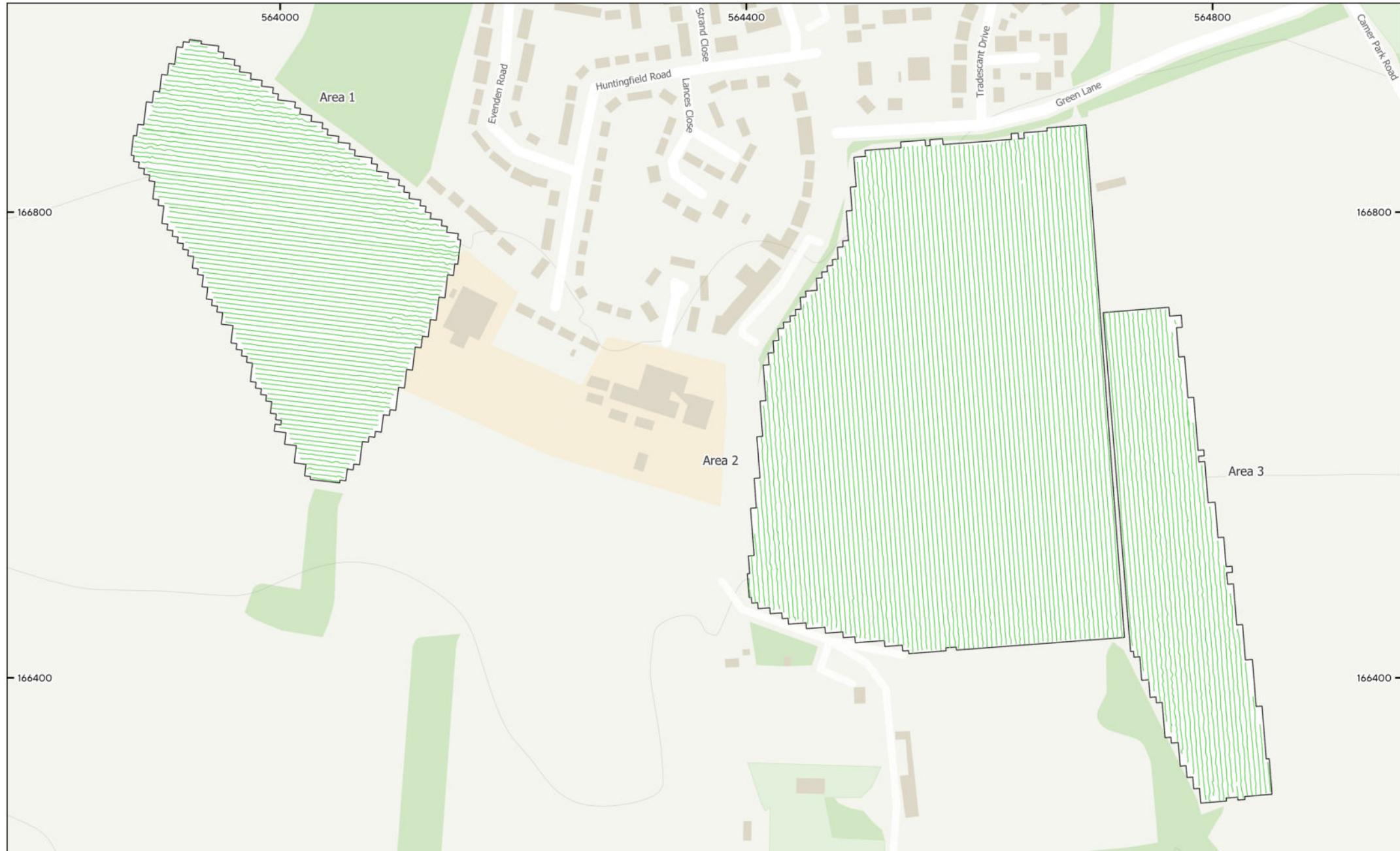




MSTQ2012 - Wrotham Road, Meopham, Kent  
 Figure 3 - Magnetic Interpretation over Historical Mapping and Satellite Imagery Overview (Areas 1, 2 & 3)  
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 © Magnitude Surveys 2025  
 Contains historical mapping © CLS Data 2025: Ordnance Survey, 6" 2nd edition c. 1882-1913  
 Contains satellite imagery © Bing Satellite 2025

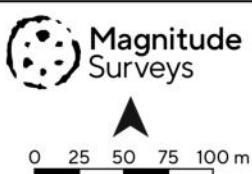
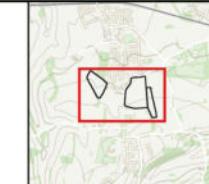
|                         |                      |
|-------------------------|----------------------|
| Natural (Spread)        | Agricultural (Trend) |
| Magnetic Disturbance    | ---                  |
| Ferrous/Debris (Spread) | Service              |
| Undetermined (Weak)     | Ferrous (Spike)      |





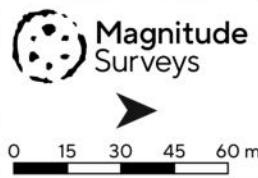
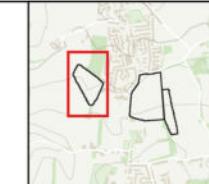
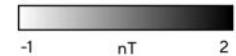
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 4 - GNSS Plot (Areas 1, 2 & 3)  
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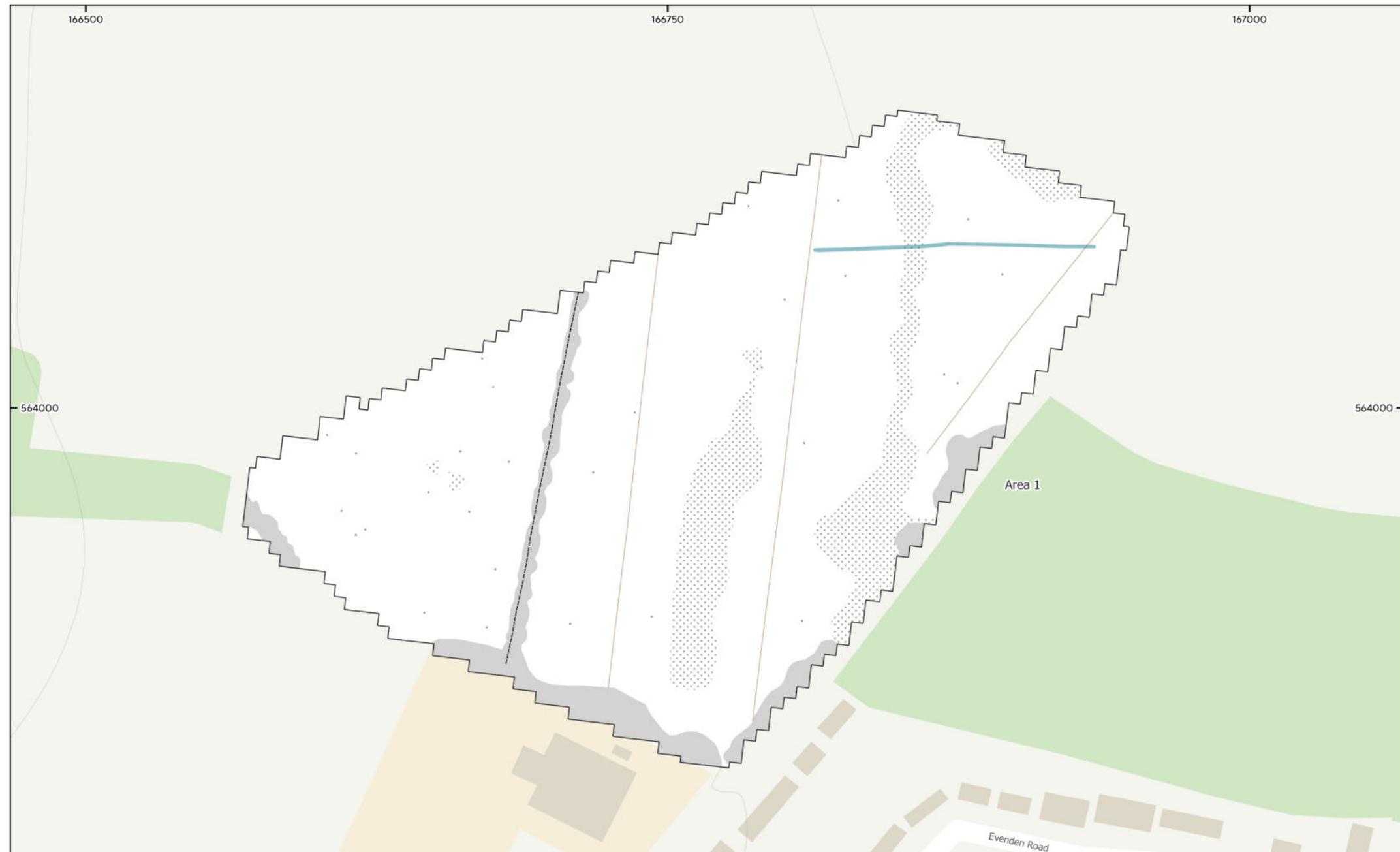
GNSS Lines





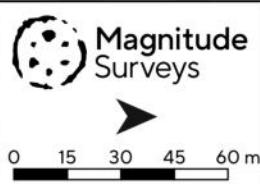
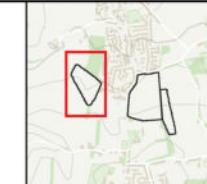
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 5 - Magnetic Gradient (Area 1)  
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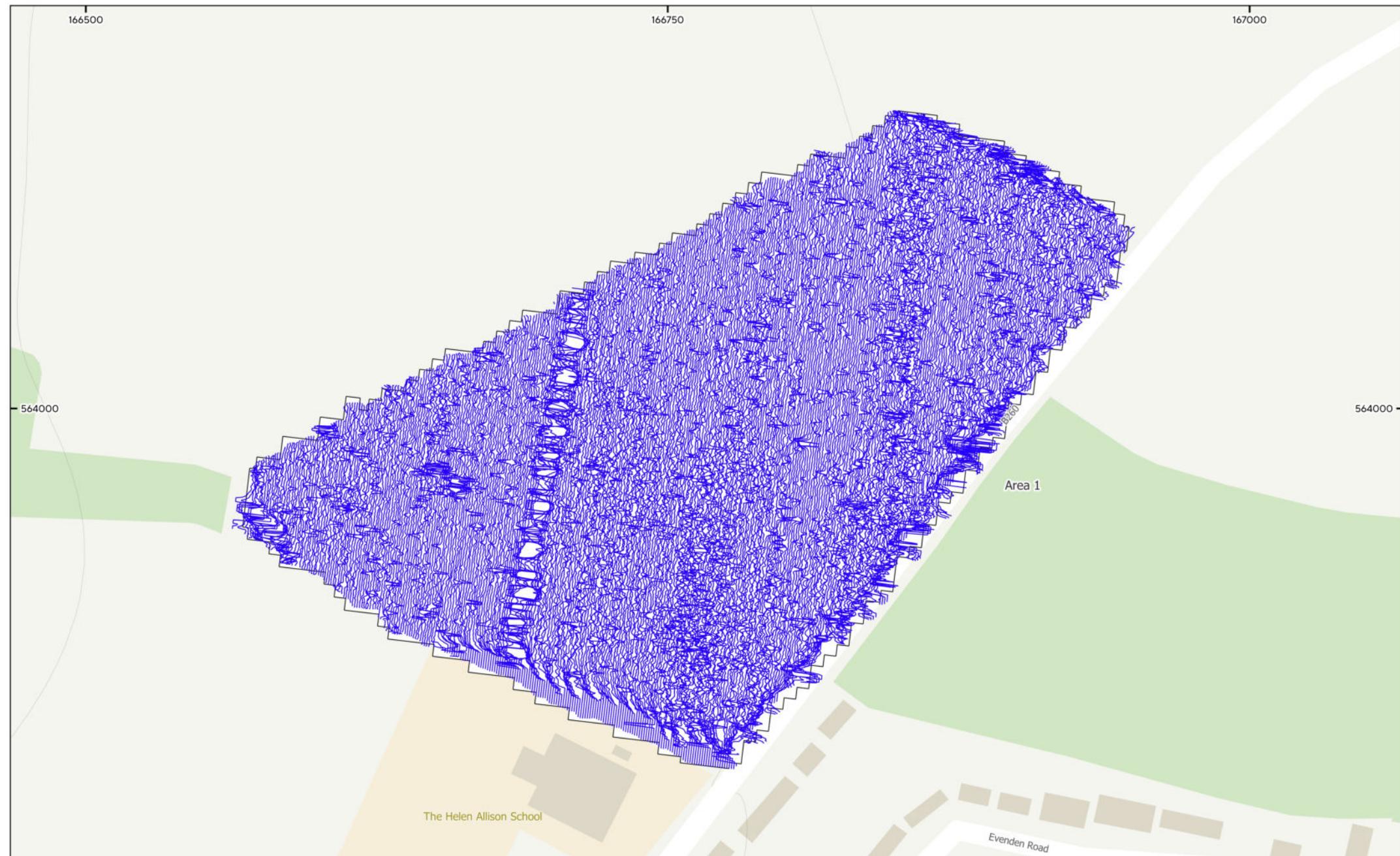




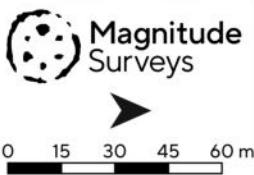
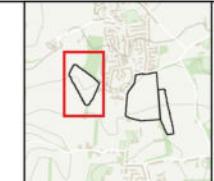
MSTQ2012 - Wrotham Road, Meopham, Kent  
 Figure 6 - Magnetic Interpretation (Area 1)  
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|                           |                        |
|---------------------------|------------------------|
| ■ Magnetic Disturbance    | — Agricultural (Trend) |
| ● Ferrous/Debris (Spread) | --- Service            |
| ■ Undetermined (Weak)     | · Ferrous (Spike)      |



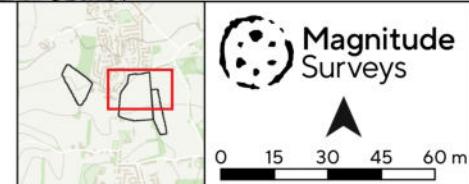


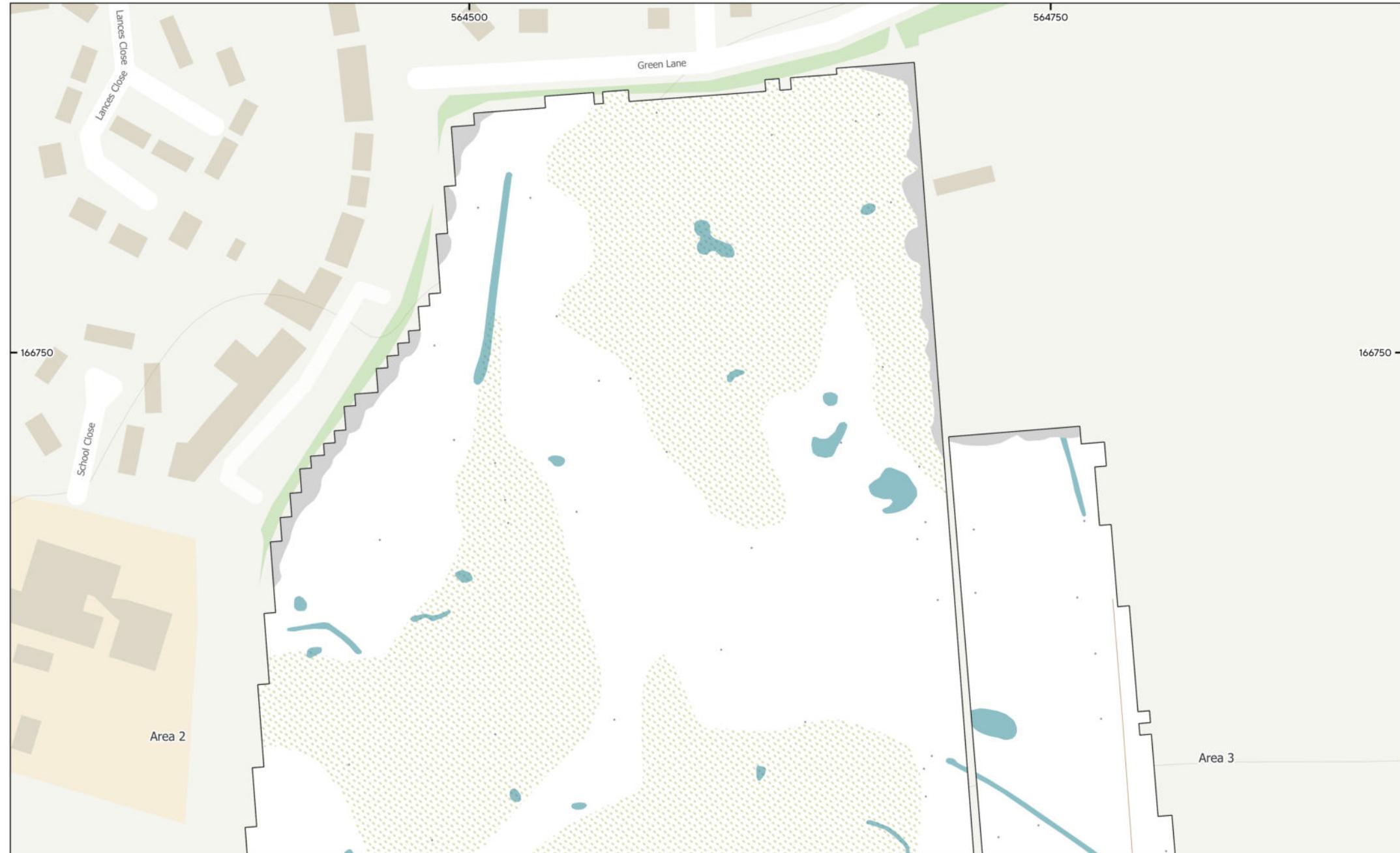
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 7 - XY Plot (Area 1)  
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30nT/cm at 1:1,500 @ A3  
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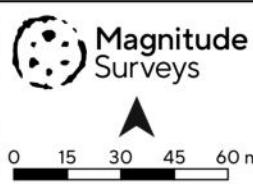
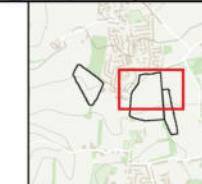
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 8 - Magnetic Gradient (Areas 2 (North) & 3 (North))  
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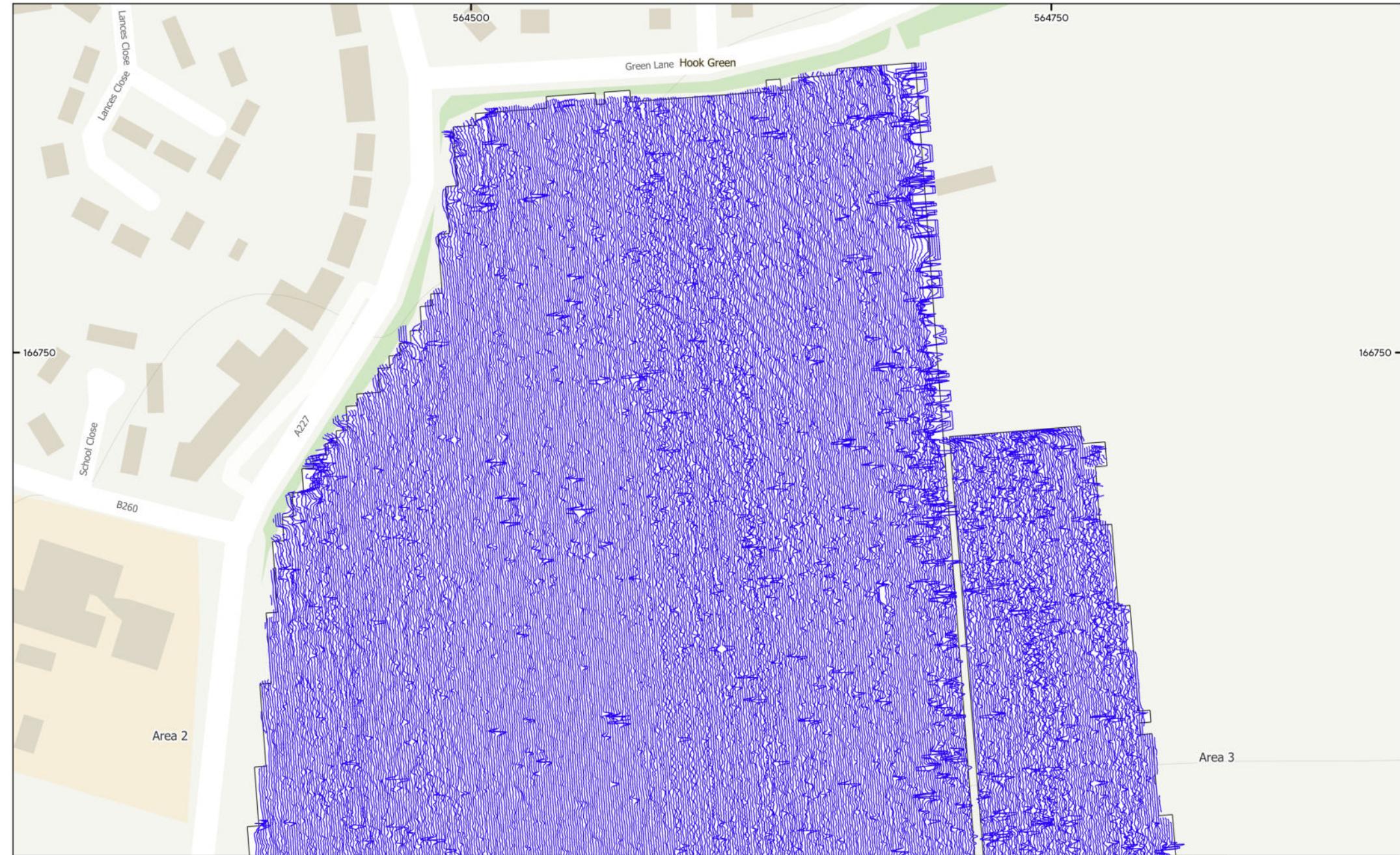




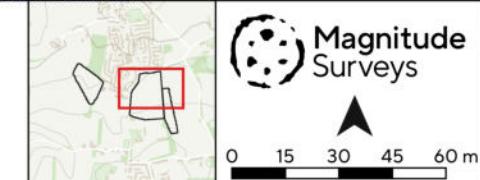
MSTQ2012 - Wrotham Road, Meopham, Kent  
 Figure 9 - Magnetic Interpretation (Areas 2 (North) & 3 (North))  
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|                      |                      |
|----------------------|----------------------|
| Natural (Spread)     | Agricultural (Trend) |
| Magnetic Disturbance | Ferrous (Spike)      |
| Undetermined (Weak)  |                      |





MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 10 - XY Plot (Areas 2 (North) & 3 (North))  
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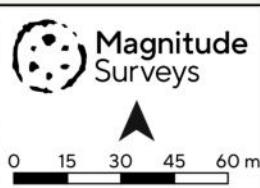
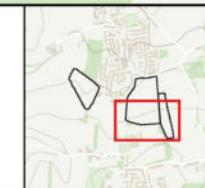
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 11 - Magnetic Gradient (Areas 2 (South) & 3 (South))  
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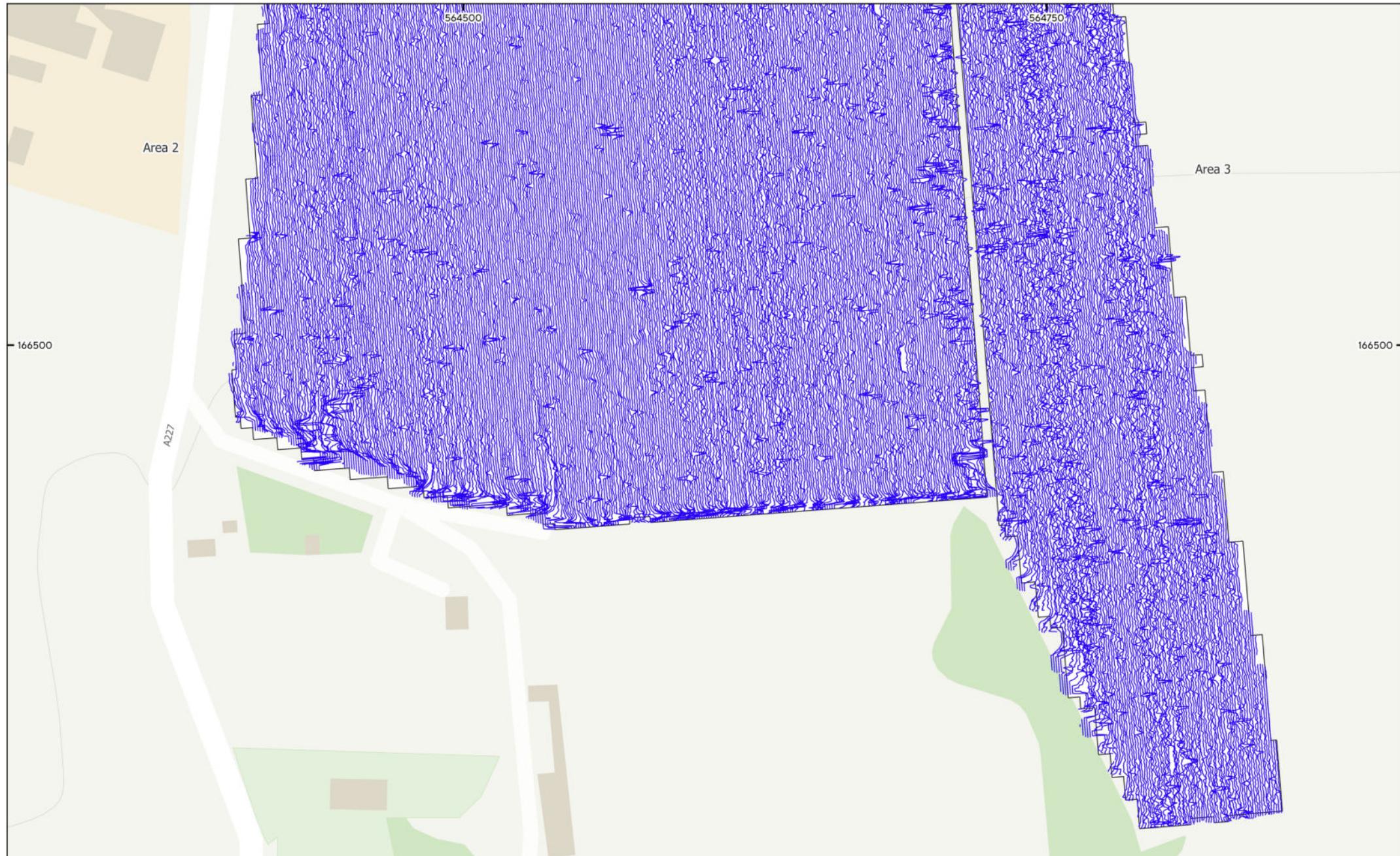




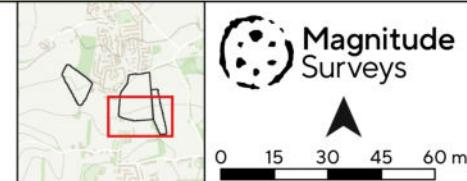
MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 12 - Magnetic Interpretation (Areas 2 (South) & 3 (South))  
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Natural (Spread) Agricultural (Trend)  
Magnetic Disturbance Ferrous (Spike)  
Undetermined (Weak)





MSTQ2012 - Wrotham Road, Meopham, Kent  
Figure 13 - XY Plot (Areas 2 (South) & 3 (South))  
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30nT/cm at 1:1,500 @ A3  
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## Appendix 8: Full List Entry

### PARISH CHURCH OF ST JOHN THE BAPTIST

#### Official list entry

**Heritage Category:** Listed Building

**Grade:** I

**List Entry Number:** 1039866

**Date first listed:** 21-Nov-1966

**Statutory Address 1:** PARISH CHURCH OF ST JOHN THE BAPTIST,  
WROTHAM ROAD

#### Location

**Statutory Address:** PARISH CHURCH OF ST JOHN THE BAPTIST,  
WROTHAM ROAD

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

**County:** Kent

**District:** Gravesham (District Authority)

**Parish:** Meopham

**National Grid Reference:** TQ 64471 66240

#### Details

TQ 66 NW MEOPHAM WROTHAM ROAD 4/93 (east side) 21.11.66  
Parish Church of St John the Baptist I

1320-25 in the primacy of Simon de Mepham. Somewhat rebuilt

after earthquake in 1326. Ragstone and flint. Large chancel. Lady Chapel (now vestry) 2 aisled nave. West tower, north and south porches. C19 restorations: reroofing 1858. Tower raised and chancel refurnished 1874. Interior has fine pulpit of 1682 from St Margarets Westminster. Wall tablets in chancel by R J Wyatt and E B Stephens and in north aisle to K Marten by T Beard 1750.

**Listing NGR:** TQ6354863195

#### Legacy

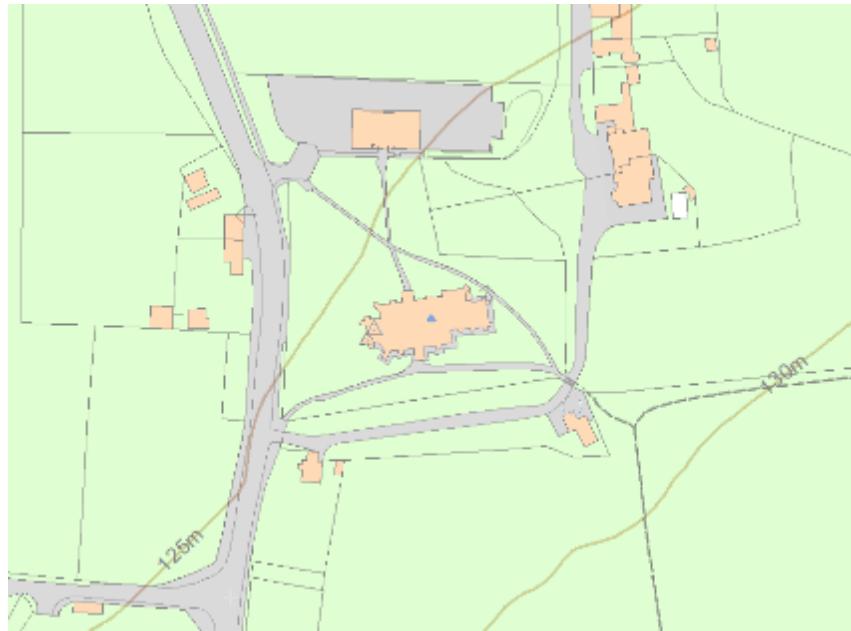
The contents of this record have been generated from a legacy data system.

**Legacy System number:** 356822

**Legacy System:** LBS

#### Legal

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



**End of official list entry**

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