

Heritage Statement

Proposed Conversion of Former Agricultural Barn for
Development of 5 Holiday Unit Accommodation Units

At

Abbey Farm Barn, Church Street, Higham Rochester ME3 7LS

Client: Provectus Holdings Limited

Consilium Town Planning Services Limited

March 2023

1 Introduction

- 1.1 The report is prepared for Provectus Holdings Limited. It has been prepared to inform a full planning application for the conversion of a former agricultural barn for 5 holiday let units on the site as shown on the submitted drawings accompanying this application.
- 1.2 This Heritage Statement is prepared by Andrew Street BSc (Hons) DipTP MRTPI. My qualifications include a specialism in conservation and urban design. I am a Director of Consilium Town Planning Services Limited. I have been qualified for 22 years in both private and the public sectors.
- 1.3 The Local Planning Authority has again asked for a Heritage Statement to accompany the planning application. It should be read alongside the submitted planning application drawings and Planning Statement.
- 1.4 There are two designated 'heritage assets' in the distinct vicinity relevant to this proposal ('heritage assets' are defined in the National Planning Policy Framework (2021)). They are:
 - St Mary's Church a Grade 1 listed building (ref. 1350225)
 - Church Street, Higham Conservation Area.
- 1.5 The purpose of this document is twofold. It firstly provides a proportionate assessment of the significance of the nearby conservation area and listed building to a proportionate degree of detail. Secondly, it provides an assessment of the effect of the proposals on the significance of the heritage, in accordance with paragraph 189 of the National Planning Policy Framework (the NPPF) 2021.

2.0 Relevant Heritage Policy & Guidance National Planning Policy and Guidance

- 2.1 Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 and has special regard to the desirability of preserving a listed building or its setting. Considerable importance and weight is attached to the desirability of preserving the listed building.
- 2.2 The NPPF sets out government planning policy. Chapter 16 sets out policies for conserving and enhancing the historic environment.
- 2.3 Paragraph 189 requires applicants to describe the heritage significance of heritage assets potentially affected by proposed development. This should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 189 places an onus on local planning authorities to identify and assess the significance on any heritage asset that may be affected, and to take this assessment into account when considering the impact of a proposal.
- 2.4 Paragraph 192 states that local planning authorities, in determining planning applications, should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 2.5 Paragraph 193 advises that great weight should be given to an asset's conservation; the more important the asset, the greater this weight should be. It goes on to state that significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. Any such harm or loss should require clear and convincing justification.
- 2.6 Paragraphs 195 and 196 set out two decision-making tests where proposals would lead to substantial and less than substantial harm respectively. Paragraph 195 guides that substantial harm to or total loss of significance should not be permitted unless that harm is necessary to deliver substantial public benefits that would outweigh that harm or loss, or other criteria are met.
- 2.7 Paragraph 196 guides that where a development proposal would lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 2.8 Paragraph 197 of the NPPF guides that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset in determining applications affecting non-designated heritage assets.

- 2.9 Paragraph 200 guides local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 2.10 The significance of a heritage asset is defined in the NPPF as being made up of four main constituents, architectural interest, historical interest, archaeological interest and artistic interest. The setting of the heritage asset can also contribute to its significance. Setting is defined in the NPPF as follows: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. (Annex 2: NPPF 2021) National Planning Policy Guidance
- 2.11 National Planning Practice Guidance (NPPG) makes it clear that: Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated. Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. (Para Ref. ID 18a-018-20190723) Best Practice Guidance
- 2.12 Good Practice Advice in Planning (GPA) 'Note 2: Managing Significance in Decision Taking in the Historic Environment' (2015) provides information on good practice to aid decisionmakers in the implementation of policy set out in the NPPF and PPG.
- 2.13 GPA 'Note 3: The Setting of Heritage Assets' (2017) sets out advice on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It advocates a staged approach to assessing significance and the impact of development within the setting of heritage assets.
- 2.14 Historic England Advice Note 12 "Statements of Heritage Significance" (2019) covers the NPPF requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal.

Local Plan Context

- 2.15 The relevant development plan in Gravesham Swale Borough Council (SBC) advises at that the Borough's heritage assets, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, archaeological sites and Historic Parks and Gardens will be conserved and enhanced and special regard will be had to their settings.
- 2.16 Policy CS20 of the Council's Core Strategy and saved Policy TC3 of the Gravesham Local Plan First Review 1994 are also relevant.
- 2.17 Policy CS20 of the Core Strategy places a high priority on the preservation, protection and enhancement of the Council's heritage and historic environment. In addition, Policy TC2 of the Gravesham Local Plan First Review 1994 relates to listed buildings and states that in the case of applications affecting the setting of listed buildings the primary consideration of the Borough Council will be the maintenance of the integrity of the original listed building.
- 2.18 Policy TC3 of the Gravesham Local Plan First Review 1994 requires that development within or affecting conservation areas will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area.

3 Statement of Significance

- 3.1 This section seeks to establish the heritage significance of the heritage assets on the site, which is defined in Annex 2 of the NPPF 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.'
- 3.2 The setting of a heritage asset is described in Annex 2 of the NPPF 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 may be neutral.'

Church Street Higham Conservation Area

- 3.3 The site lies within the Church Street Conservation Area and is adjacent to a Grade I Listed Building known as Church of St Mary and a Grade II Listed Building known as Abbey Farm. The proposed development would have an impact on the setting of these heritage assets.
- 3.4 Land at Abbey Farm lies to the north of the Church Street Conservation Area. Church Street itself lies north of the villages of Higham and Lower Higham. Church Street connects Lower Higham to the south with Buckland Road to the east which connects with the B2000 and the settlement of Cliffe Woods.
- 3.5 The site of the proposed barn conversion lies to the north of a cluster of existing residential dwellings. This comprises a number of detached residential properties whose gardens border the farm's boundary. The wider surrounding area is characterised by open agricultural land with drainage ditches, small ponds and a watercourse to the north and east of the site on the boundary. To the south-west of site lies a listed building church (St Marys Church).
- 3.6 There is no archaeological connections associated with the site.

Listed Buildings

- 3.7 St Mary's Church is situated a distance of 50 metres from the application site. It is a redundant Anglican church in the village recorded in the National Heritage list as a designated Grade 1 listed building and is under the care of the Churches Conservation Trust. The listing reads:

HIGHAM HIGHAM ROAD TM 03 NW (south side, off) 3/5 **Church of St Mary 22.2.55 GV II* Church.** Tower C13 origins. Otherwise C14-C15.

Porch c.1893 by W H A Berry. Restored 1888 at a sum of £1,500 (Kelly's). Coursed flint with knapped flint to chancel, ashlar dressings. Plain tile roof. West tower, nave with 4-bay north aisle, porch and 2-bay chancel. 3-stage tower with offset diagonal buttresses, stair turret to south.

Renewed west door. Basket-arched west window with Perpendicular tracery. Small lancet to west and north faces at second stage, 2-light restored bell openings. Quoins and embattled parapet. North aisle: roofed separately from nave, offset buttresses. West window head renewed, otherwise 2-light flat-headed windows with ogee lights, probably late C14 with some replaced stonework. Gabled timber porch contains original 2-centred continuously-moulded door. 3-light basket-arched window with Perpendicular tracery to east end of aisle. South side of nave: blocked south door with renewed head. Restored buttresses and 2 replaced windows with Perpendicular tracery. 2-light flat-headed window to west of door partly renewed.

Chancel: renewed 4-centred windows with Perpendicular tracery with hoodmoulds and arches of red brick and flint. East window with intersecting tracery renewed. Diagonal offset buttresses, flushwork to part of plinth. Blocked priest's door to south side. Interior: nave arcade piers of 4 filleted shafts with slender polygonal shafts to angles. Band capitals with alternating patterns of fleurons and vine scrolls. Finely-moulded arches under hoodmoulds with head or foliate stops. Nave roof C19 but incorporates three medieval chamfered arch braces forming pointed arches resting on head corbels. Aisle roof C16 with moulded beams on short wall posts with head corbels, arched braces with tracery to spandrels. Leaf scroll to longitudinal beams and moulded joists with run-out stops. Wall plate with angels and fleurons and rafters probably renewed. Disused broken panelled octagonal font. 4 original poppy heads incorporated into C19 pews. Ogee-arched nave piscina. Chamfered-arched door to tower stairs has original studded door with strap hinges. C19 timber chancel arch with pair of saints in canopied niches on corbels. Chancel roof has elements of c.1500 including brattished wall plate with capitals to truncated wall shafts at bay divisions supporting moulded arch braces incorporated into C19 wagon roof. 4-centred piscina with fleurons probably renewed. Marble and ceramic tile reredos of 1892. The chancel appears to be the most extensively restored part, the walls may be refaced externally or even rebuilt.

4 The Planning Application Proposals

- 4.1 The full planning application is for the conversion of the former agricultural barn to five holiday let units on the site with vehicular access, pedestrian access, drainage and landscaping works. The submitted drawings depict the site layout proposals. A full description of works is set out in the accompanying Planning Statement.

Consideration of Heritage Effects

- 5.1 Provided below is a consideration of effects on the designated heritage assets taking into the above analysis and the contribution the site makes towards of the significance of these assets.

Effects on Church Street Conservation Area

- 5.2 As explained above, the setting of the existing building makes little if any contribution to the significance of the Conservation Area as a designated heritage asset.
- 5.3 There is no architectural, artistic or archaeological relationship between the barn and the Conservation Area.
- 5.4 The proposed development sensitively responds to this existing settlement character and pattern. Moreover, the development has been carefully designed through the selection of materials and design so that the proposal provides a positive impact on the setting of the conservation area.
- 5.5 In addition, the development has also factored the following heritage considerations into the scheme design:
- The overall design and form of the proposals have drawn largely upon an historic prevalence in this area of traditional weatherboarded barns that were predominately used on the marshes;
 - The proposed scheme will complement the Kent vernacular by use of similar and materials and details used in the construction of the barn;
- 5.6 Lastly, it is not considered that the proposed development would give rise to any environmental factors such as noise, dust and vibration from the proposed land use that would affect the understanding of the historic relationship (to the extent there is any) between the existing barn and the Conservation Area.
- 5.7 In summary, it is considered that the scale, design and layout of the built form proposed will limit the potential impact on its significance. The high-quality design would soften the new development, assisting to assimilate it into its context. It is not considered that the scheme would impact our ability to appreciate the nearby designated heritage assets.
- 5.8 It is therefore considered with the overall effect of the development on the significance of the Conservation Area or its setting is arguably 'neutral' or positive. To the extent that any harm could be argued to be caused to the significance of the Conservation Area, then it is considered this would be at very low level of 'less than substantial harm'.

Effect on Heritage Asset St Mary's Church

- 5.9 There is no historical functional link between the application site and the listed building. The land did not form part of an agricultural holding associated with the church.
- 5.10 St Mary's was founded in the Saxon era, and a church was in existence on the site before the Norman Conquest. The present church was rebuilt after the Conquest, and it still contains some Norman features, despite later additions and alterations. During the 12th century a nunnery was founded nearby, and in about 1280 it moved to a site opposite the church. In 1357 the nunnery received a papal approval to raise money for repairs. It is thought likely that this was used to build a new south aisle for the church, which is as large as the original nave. The nunnery was closed in 1522. In 1710 the spire was built. The church was repaired and restored in the early part of the 19th century. The south porch was built during the 19th century. In 1863 the church was restored by an architect and new furniture was installed. The windows were replaced 'copying what was there before'. However, by the middle of the century the centre of Higham's population had moved away from the area of St Mary's, and a new church, dedicated to St John, was built nearer to the railway station and the main road in 1862.
- 5.11 Repairs were carried out to the roof and spire of St Mary's during the 20th century. After the church was declared redundant, it was gifted to the Redundant Churches Fund, the forerunner of the Churches Conservation Trust, in 1987. In the same year St Mary's was replaced as the parish council by St John's Church. During the 21st century, further repairs to the stonework of the south aisle, porch and east end have been organised by the Trust. In the wall of the south aisle, the external flintwork has become separated from the core of the wall, and work has been undertaken to pin the two together.
- 5.12 As has been explained above and in greater detail in the Design and Access Statement, the development has been carefully designed drawing reference from the surrounding built environment and heritage considerations. This includes appropriately reference typical design treatments and materials, to ensure that it positively responds to the local vernacular.
- 5.13 As has also been highlighted above, it is considered that the proposed development ensures that both a physical and a clear perceived degree of separation remains.
- 5.14 It is not considered that the proposed development would give rise to any environmental factors such as noise, dust and vibration from the proposed land use that would affect the understanding of the historic relationship (to the extent there is any) between the site and the designated heritage asset.
- 5.15 Moreover, it is considered that the scale, design and layout of the built form proposed, and the intervening distance will limit the potential effects on the significance of the heritage assets. The high-quality design and proposed landscape proposals would further screen and soften the new development,

assisting to assimilate it into its context. **It is not considered that the scheme would impact any ability to appreciate the designated heritage asset.**

- 5.16 It is therefore considered that any harm could be argued to be caused to the significance of these assets, then it is considered this would be at a very low level of *'less than substantial harm'*.

6 Summary and Conclusion

- 6.1 This Heritage Statement comprises a proportionate consideration of the relevant designated heritage assets comprising Church Street Conservation Area and St Marys Church. It is considered sufficient to understand the potential impact of the proposed development on their significance.
- 6.2 For the reasons set out in the report above, this document together with the accompanying plans and supporting information have demonstrated compliance with the local policy requirements.
- 6.3 The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires local planning authorities to have regard to the desirability of preserving the significance of listed buildings, including any contribution made by their setting to that significance. By virtue of the proposed conversion work to the existing barn, it is not considered that the proposals would result in an unacceptable level of harm to the significance of the listed buildings or their settings and therefore meet the statutory test set out at Section 16 of the 1990 Act.
- 6.4 The NPPF sets out government planning policy. Chapter 16 sets out policies for conserving and enhancing the historic environment.
- 6.5 For the reasons set out in this report it is considered that due to the scale and nature of development proposed, combined with the proposed site layout and associated landscaping would not result in harm to the significance of the heritage assets or their setting. As such the proposals are considered to be in line with the objectives set out in paragraph 192 of the NPPF.
- 6.6 To the extent that any harm could be argued to be caused to the significance of these assets, then it is considered this would be at a very low level of '*less than substantial harm*'.
- 6.7 It considered that the proposed development plainly now achieves this objective and it is considered that the proposal can be supported from a heritage perspective.