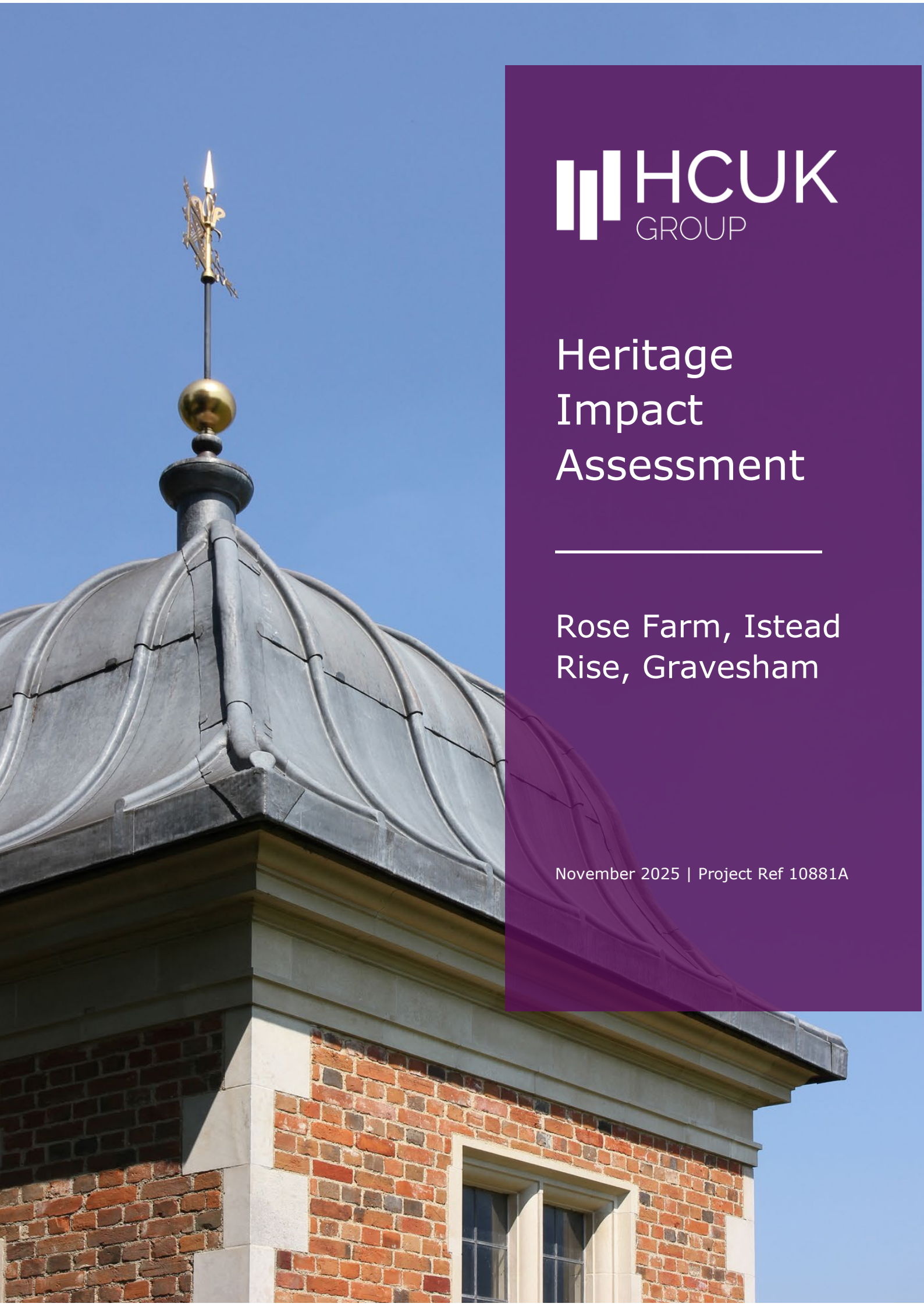




Heritage Impact Assessment

Rose Farm, Istead
Rise, Gravesham

November 2025 | Project Ref 10881A





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Contents

- 1. Introduction 4**
- 2. Relevant Planning Policy Framework..... 6**
- 3. Statement of Significance..... 10**
- 4. Heritage Impact Assessment..... 21**
- 5. Conclusions 26**

Appendices

- App. 1 Scale of Harm table (HCUK, 2019)**

1. Introduction

1.1 This Heritage Impact Assessment (HIA) has been prepared by HCUK Group on behalf of Esquire Developments Ltd. The report accompanies an outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road at Rose Farm, Istead Rise, Kent.

1.2 The site is currently comprised of a mixture of arable fields, paddocks, woodland, garden space, and includes agricultural barns and stabling as well as two residential dwellings (see Figure 1, below, for site location). The total area is c.9.57ha and the site is centred on NGR TQ 63185 69687.

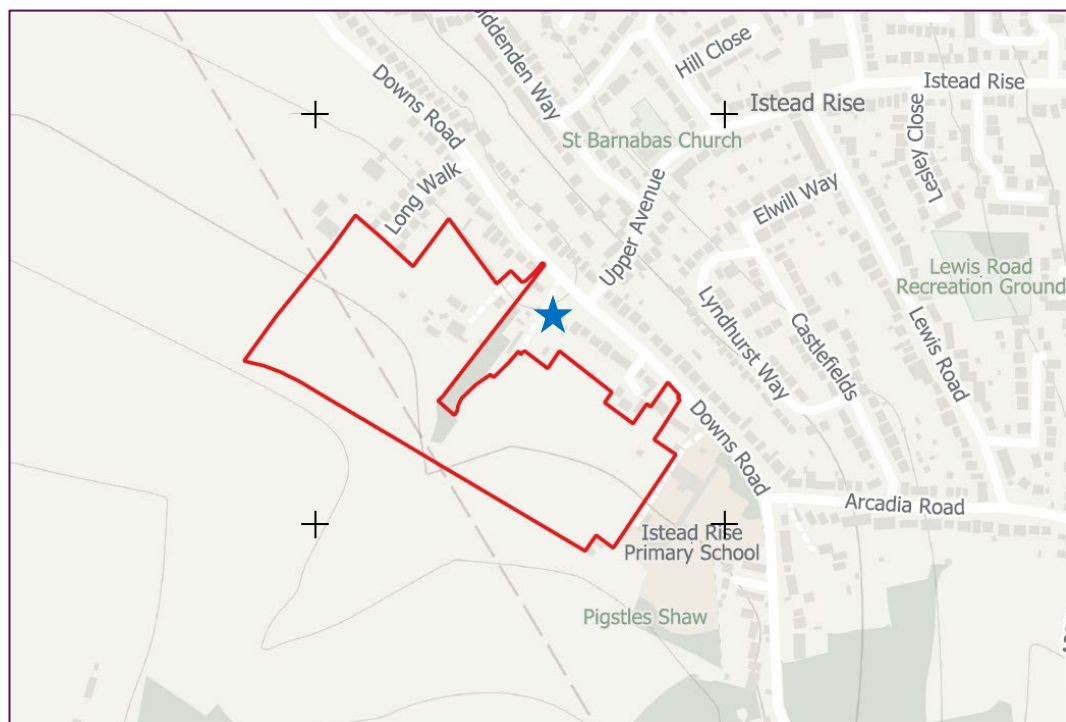


Figure 1: Site location plan with red line boundary showing Downs Hall, grade II listed

The Context

1.3 There are no designated or non-designated heritage assets within the application site itself. There is one nearby listed building, Downs Hall (Grade II), located c.60m

north of the site boundary. This is the only heritage asset considered potentially susceptible to effects posed by the proposals within its setting and is therefore the sole consideration of this report.

- 1.4** The site has been previously considered for allocation (GBS L) through the Gravesham Borough Local Plan and could support c.165 homes on it. While the Local Plan is still in development this indicates a direction of travel in policy terms in relation to the expansion of Istead Rise through development of housing on the site.

Purpose of this Statement

- 1.5** The purpose of this HIA is to assist with the determination of the applications by informing the decision makers on the effects of the proposed development on the historic built environment.
- 1.6** The heritage assets susceptible to impact have been observed and assessed by the author following a site visit in good weather in March 2025.
- 1.7** Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can 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.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

2.6 Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.7 The NPPF requires any harm to the significance of a designated heritage asset⁴ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 214 and 215 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at Appendix 1.

2.8 Paragraphs 214 and 215 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 214 or 215 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

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

2.9 Paragraphs 212 and 213 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ *Bedford Borough Council v SSCLG and Nuon UK Limited* [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in *City and Country Bramshill v CC SLG and others* [2021] EWCA, Civ 320.

affect its significance, irrespective of how substantial or otherwise that harm might be.

2.10 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

2.11 A full review of local policy has been undertaken as part of this assessment. Policy CS20, contained within the Gravesham Local Plan Core Strategy 2014, is relevant to the proposals:

Policy CS20: Heritage and the Historic Environment

5.16.10 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.

5.16.11 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.*

5.16.12 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.

3. Statement of Significance

Assessment of Significance

3.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 4 (Heritage Impact Assessment).



Figure 2: Aerial image showing the location of nearby designated heritage asset, Downs Hall (Grade II)

Step 1: The identification of heritage assets potentially susceptible to impact by the proposals

3.2 There are no designated or non-designated heritage assets within the application site itself. There is one designated heritage asset within close proximity of the application site which as part of Step 1 was considered to be potentially susceptible

to impacts by the proposals through effects posed within its setting, the Grade II listed Downs Hall, which is located c. 60 north of the site boundary (see Figure 2, above). This asset is therefore considered further under Step 2, below.



Figure 3: Downs Hall (Grade II) looking west onto the front elevation from the street

Step 2: The contribution made by setting to the significance of the assets

Downs Hall (Grade II)

3.3

Downs Hall was designated Grade II in 1983. It comprises the former farmhouse associated with 'Downs Farm', and is indicated on historic maps (see Figures 4-8, below). It is the oldest surviving building in Istead Rise. The building was divided into two in 1963, (Downs Lodge, No.44 and Downs Hall, No.42) with modern garages built on either side of the front façade at that time. No.40 Downs Road is a modern detached house which may have once been attached to the listed building at first floor level (according to the list description). It lies immediately northwest of the listed building with a flat roof and side elevation facing onto the main frontage. The garden to the rear was subdivided in 1963 but the frontage kept as one.

3.4

The list description provides the following information:

C18. Cement rendered brick walls, tiled roof. Two storeys and attic. String course at first floor level; eaves cornice. Two sash windows with glazing bars intact on ground floor, 3 similar windows on first floor. Two hipped, tiled dormers with casements. Gable ended roof. Large porch with hipped tiled roof. Modern 2-storey extension to 42, attached to first floor only.

3.5

Historic records show that an agreement dated 14th February 1755 leased land that included Downs Farm from Sir Charles Sedley (of Nottingham) to Henry Edmeades (of Nurstead) for 21 years at a rent of £112 per year. Henry Edmeades is shown to have owned the farmhouse (Downs Hall) and it was known as a regular meeting place for the Camer Hunt⁷.

3.6

The significance of the house stems principally from its architectural interest as an example of a Georgian Farmhouse with typically balanced proportions and a symmetrical façade, which has been maintained despite the internal split. The former farmhouse also possesses local historic interest through its association with the agricultural origins of the settlement and key local figures. It is also evident that historically the house was a meeting place (as noted above) and in this regard also held some communal value locally.

The contribution made by the setting of the asset to its significance

3.7

The setting of Downs Hall is now characterised by its surrounding garden plot, which includes substantial trees both to the front along Downs Road and to its rear (abutting the application site boundary) and modern housing development to the northwest, southeast and east. The house is orientated towards the road, and it is from this perspective that its architectural interest is best appreciated. The surrounding topography is undulating with land on the northeast side of Downs Road rising steeply uphill. The listed building lies at the bottom of the valley with the application site land rising up beyond the built form on Downs Road.

⁷ Ken Jones (2007) 'The Rise of the Rise' and <https://www.discovergravesham.co.uk/istead-rise/istead-rise-settlement-establishment.html>

- 3.8** While the setting of Downs Hall contributes to its historical interest, the change to its wider surroundings from a once rural character to a semi-urban character has diminished the role its setting plays in significance.
- 3.9** Historic maps indicate the historically rural setting of the listed farmhouse to the southeast, southwest and northwest of it. It formed the northerly most building of a complex of buildings likely forming a farmyard behind the farmhouse with paddocks, small, wooded areas and larger fields forming part of the land holding. Over time that confirmation of built form has changed and the building is now firmly in a domestic, garden setting but with an agricultural character to the wider area south-westwards. The nature of the land has changed with larger agricultural fields and horse paddocks occupying many areas of the site.
- 3.10** The 1839 Northfleet Parish Tithe Map (Figure 4, below) shows the application site as being split across ten plots being utilised for mixed-use agricultural purposes. The map shows that part of the application site covers part of the former orchard area associated with Downs Farm, as well as a large building, likely to be a barn, at the southern end of the farmyard. A roadway leading from the farmyard through the centre of the application site, and to the south-west, is also depicted. At this time the landowner was Uvedale Thomas Strudd Price Esquire, and the occupier of Downs Farm was Robert French.

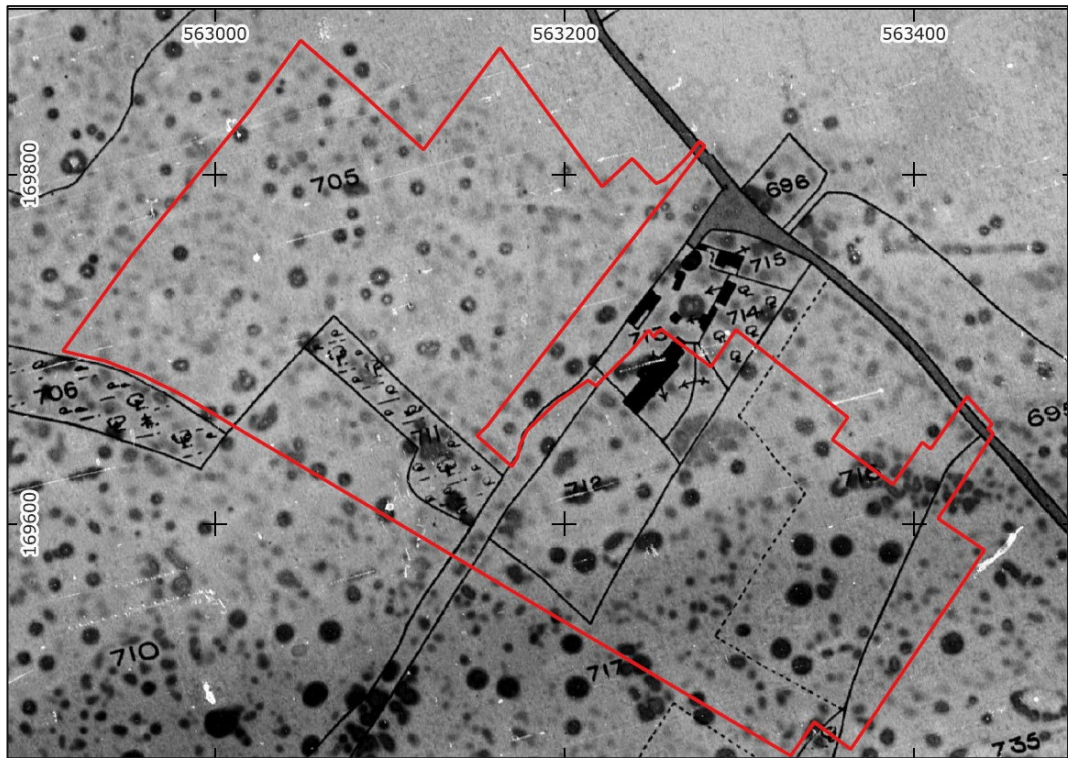


Figure 4: Extract from the Northfleet Parish Tithe Map

3.11 The 1865-7 Ordnance Survey map (Figure 5, below) shows little change around the farm, other than a field boundary in the eastern end of the site no longer being depicted. A barn is shown in the centre of the application site. However, by the time of the 1895-8 Ordnance Survey map (Figure 6, below) there has been a clear reduction in the size of Downs Farm, including the loss of the large barn which had previously been within the Site. The secondary barn first identified on the 1865-7 map appears to have been reduced in size.



Figure 5: Extract from the 1865-7 County Series Ordnance Survey Map

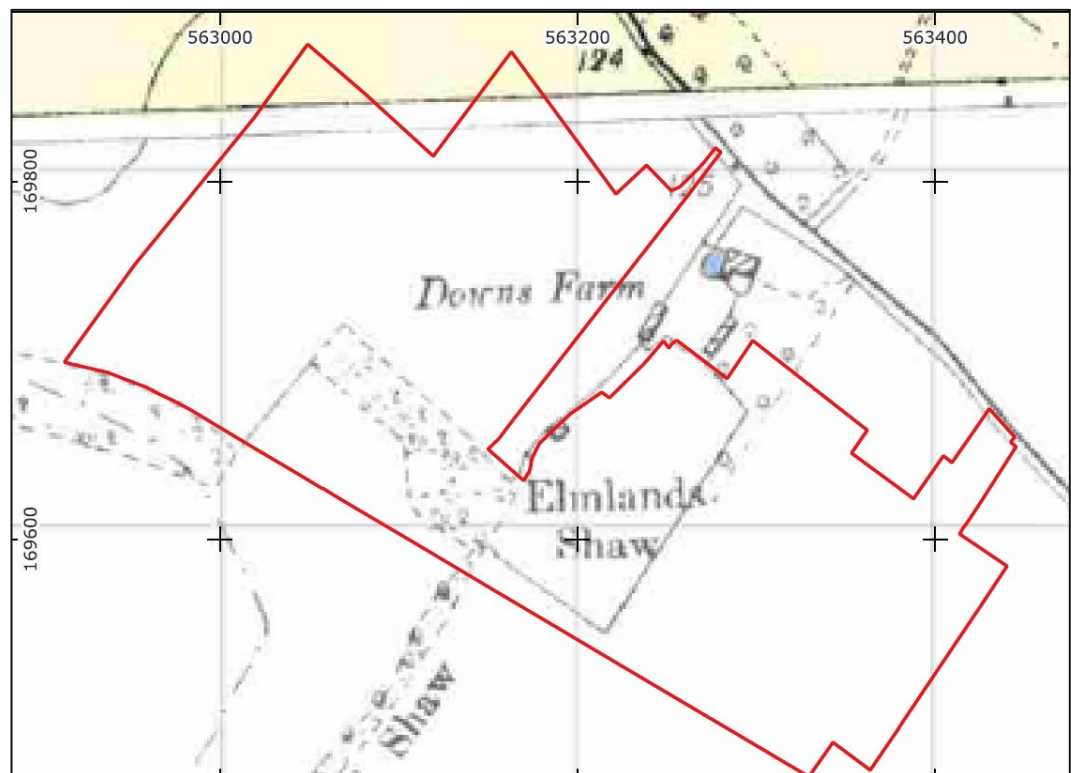


Figure 6: Extract from the 1895-8 County Series Ordnance Survey Map

3.12 The 1907 Ordnance Survey map (Figure 7, below) shows that much of the north-western parts of the application site have been subdivided into smaller field units,

including the apparent creation of two orchards and the construction of two buildings. Some development has also begun to take place to the north-west of the application site. The 1931 Ordnance Survey map shows further subdivision and building construction within the application site, and continued development to the north-west showing that Istead Rise has begun to take shape as a settlement in its own right.



Figure 7: Extract from the 1907 County Series Ordnance Survey Map

3.13 By the time of the 1965-6 Ordnance Survey map (Figure 8, below) further plot boundary changes, building construction and additional orchards are indicated within the application site.

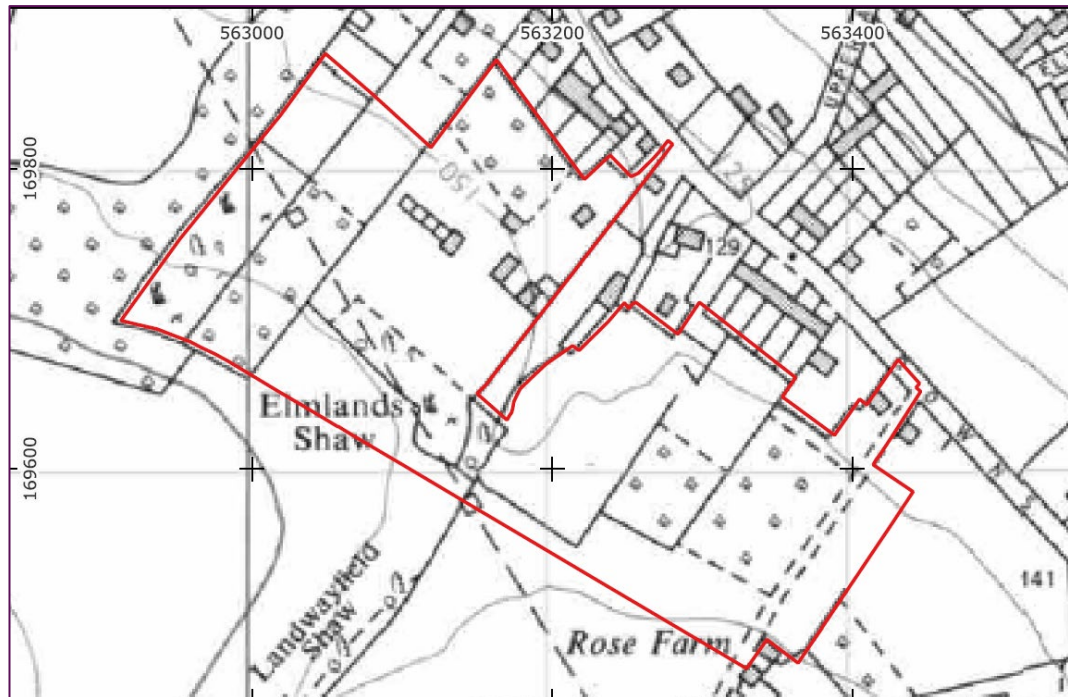


Figure 8: Extract from the 1965-6 County Series Ordnance Survey Map

3.14 The setting of Downs Hall has changed over time. Today, its heritage significance is best appreciated from its immediate surroundings, that being from Downs Road and its immediate garden areas. The building sits in a semi-rural context and thus while the setting of the building contributes to its significance it has been eroded over time with the development of housing in most directions, rendering it a less important part of the building's significance than it might have otherwise been. Downs Road remained undeveloped.

The contribution made by the application site to the setting of Downs Hall

3.15 While the setting of the asset has undergone substantial change through the growth of Istead Rise the application site land does have some historical associative links with the listed building. Any visual link between the site and the listed former farmhouse can only be achieved in views of the building from the high ground to the east of the site from where the application site forms part of the visual backdrop against which the former farmhouse's rural character can be appreciated (for example, Figures 12 and 13, below). This is due to the undulating topography of the area. Figures 9-11 show views of the listed building where the application site is not visible and where the building is enjoyed as part of Downs Road in multiple directions.



Figure 9: Downs Hall (Grade II) looking northwest onto south and east elevation (site not visible)



Figure 10: Downs Hall (Grade II) looking west onto east elevation (site not visible)



Figure 11: View toward Downs Hall (Grade II) looking southwest from Downs Road (site not visible)



Figure 12: View towards Downs Hall, showing the application site as its backdrop. This view is incidental rather than a key view



Figure 13: View towards Downs Hall, showing the application site as its backdrop. This view is incidental rather than a key view



Figure 14: View of Downs Hall rear elevation from application site, looking east

3.16 The application site currently contributes to the setting of the asset because of its historical link and undeveloped nature, thus indicating in some part the former agricultural use of the land surrounding the farmhouse.

4. Heritage Impact Assessment

Assessment of Significance

4.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment below.



Figure 4: Proposed development plan (outline)

Impact Assessment

4.2 The proposed development comprises an outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road.

- 4.3** planning application for up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access, and the creation of a new access from Downs Road (see Figure 12, above).

The effects of the proposals on the heritage assets

Downs Hall (Grade II)

- 4.4** As identified in the preceding sections, the application site forms part of the setting of the Grade II listed Downs Hall and remains a positive aspect of the assets setting which contributes to its understanding as a former farmstead, and as such, to its significance.

- 4.5** In assessing the effect of the proposals on the setting and significance of Downs Hall it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

| <i>Relevant Considerations</i> | <i>Downs Hall</i> |
|---|--|
| <i>Proximity of the development to the asset</i> | c. 60m to the north of the site at its closest point. |
| <i>Proximity in relation to topography and watercourses</i> | There are no watercourses of relevance. The land to the front and rear of the listed building rises up from the lower level of Downs Road. The application site is thus on higher ground than the listed building in some parts. |
| <i>Position of development in relation to key views</i> | Key views of the listed building are close range, those from Downs Road looking directly onto the front and southern elevation of the building and those from the gardens to the rear. None of these will be affected. Wider incidental views from higher ground both looking southwest from the housing development of Istead Rise and the application site itself will change. Development will be highly visible in views of the listed |

| | |
|---|--|
| | building from the east and north-east looking toward the site, which forms a backdrop to the listed building. |
| <i>Orientation of the development</i> | Downs Hall is orientated towards Downs Road (away from the application site). The proposed housing will be orientated in different ways depending on location. A proposed pond is located directly south of the wooded area at the end of the garden of Downs Hall providing an open space at the centre of the site and avoiding any crowding of the listed buildings wider setting. |
| <i>Prominence, dominance and conspicuousness</i> | Downs Hall is a prominent building when viewed from Downs Road because of its size, age and location which differs from the surrounding modern low rise built form. The application site currently forms a green 'backdrop' in views toward the old farmhouse from Istead Rise (higher ground) and the proposals would slightly alter its level of conspicuousness and prominence through the introduction of built form 'behind' the asset, most notably in the winter months from these longer range views. From the rear the building is prominent for the same reason. The scheme has been designed to keep housing away from the immediate surrounding of the listed building with a pond directly south of it. |
| <i>Competition with or distraction from the asset</i> | The farmhouse is already experienced within a semi-urban environment so the change as a result of the proposed housing will not be dramatic, but it will be noticeable. The proposed residential development would distract from the asset within certain longer range views from within Istead Rise where Downs Hall is currently viewed against a partially green and agricultural backdrop. Given the already urbanised setting of the building the distraction will not be jarring. |
| <i>Dimensions, scale, massing, proportions</i> | As a residential development the proposals are likely to be in-keeping with adjacent built form in terms of the dimensions, scale, massing and proportions. |
| <i>Visual permeability</i> | The proposals will not change the visual permeability of the asset. |
| <i>Materials and design</i> | N/A - not finalised at outline stage. |

| | |
|--|---|
| <i>Diurnal or seasonal change</i> | The visual effects of the proposals on the setting of Downs Hall would be noticeable in all seasons but less pronounced in the summer months where tree cover in the grounds of the listed building will provide more screening. Diurnal change may be posed by the additional lighting of proposed residential areas during the winter months. |
| <i>Change to built surroundings and spaces</i> | The proposals will not alter the current built surroundings of the asset. |
| <i>Change to skyline, silhouette</i> | In incidental long views from between houses the new development will likely be seen beyond the listed farmhouse and its simple roofline/silhouette would be less discernible during the winter months. During summer the tree cover means the silhouette is less visible. |
| <i>Change to general character</i> | The proposals pose a change to the character of land which was formerly associated with Downs Hall as a farmstead, and which has remained agricultural since (at least) the 18 th century. That said the general character of the setting of the listed building is already semi-urban. |

4.6 Given the analysis above, it is evident that the change posed by the proposals within the setting of the Downs Hall is sufficient to affect, in a minor way, an appreciation of its heritage significance. In particular, the proposals will introduce built form to a part of the assets setting which has remained unaltered since the 18th century. This change will be noticeable in some incidental views from the high ground opposite the listed building, views which include many modern houses in the foreground. The views are not designed views but incidental and very much changed from how the building would have historically been experienced.

4.7 It is concluded that the outline proposals pose a low-medium level of less than substantial harm to the listed building and paragraph 215 of the NPPF is engaged. This is because while the development will affect the views and setting of the building in the wider context, the topography and existing surroundings of the building mean that close range views of it and its immediate grounds would not be affected and the ability to appreciate the building as a former farmhouse would still

very much persist. Reference to medium levels of less than substantial harm relates to the wording in the table at Appendix 1, specifically a 'noticeable' change. It should be noted that the proposed housing would only be noticeable in some incidental views, rather than in those key views at close range on Downs Road, from where the architectural and historic interest of the building can be best appreciated. This is a necessarily cautious assessment.

4.8

In accordance with Step 4 of the GPA 3 settings assessment guidance, it is pertinent to consider whether mitigatory measures could be employed which would potentially reduce or entirely avoid the level of harm identified. In this instance, the scheme has been designed to ensure a green lung to the south of the listed building, preserving some close range views from the rear, across the pond in the winter months but there is limited opportunity to amend the layout to an extent that would remove the harm entirely given the topography and how the site forms a backdrop to the listed building. Due to the topography of the application site land, it would not be possible to introduce landscape buffers that would remove the effect on those long range views from the southeast. Close range views will not be affected.

4.9

A low level of less than substantial harm would remain likely given the change posed to the character of land formerly associated with the historic farmstead.

5. Conclusions

- 5.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Esquire Developments Ltd. The report accompanies an outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road.
- 5.2** There are no designated or non-designated heritage assets within the application site itself. There is one designated heritage asset within proximity of the application site which as part of the settings assessment was considered to be potentially susceptible to impacts by the proposals through effects posed within its setting, the Grade II listed Downs Hall, which is located c. 60 north of the site boundary. This asset was therefore considered further in accordance with the stepped approach of GPA 3.
- 5.3** The application site was found to form a part of the setting of the Grade II listed Downs Hall and remains a positive aspect of the assets setting which contributes to its understanding as a former farmstead, and as such, to its significance.
- 5.4** Following full consideration, it is evident that the level of change(s) posed by the proposals within the setting of the Downs Hall are sufficient to alter the way in which it is experienced and understood. In particular, the proposals will introduce built form to a part of the assets setting which has remained unaltered since the 18th century, and which currently form a backdrop against which Downs Hall remains a prominent building within Istead Rise. The effect would only be evident in long range views toward the building from Istead Rise while views from its immediate surroundings would be preserved.
- 5.5** It is therefore concluded that the outline proposals pose a low-medium level of less than substantial harm to the listed building and paragraph 215 of the NPPF is engaged. This is because while the development will affect the views and setting of the building in the wider context, the topography and existing surroundings of the building mean that close range views of it and its immediate grounds would not be affected and the ability to appreciate the building as a former farmhouse would still very much persist. Reference to medium levels of less than substantial harm relates

to the wording in the table at Appendix 1, specifically a 'noticeable' change. It should be noted that the proposed housing would only be noticeable in some incidental views, rather than in those key views at close range on Downs Road, from where the architectural and historic interest of the building can be best appreciated. This is a necessarily cautious assessment.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 214 and 215, and guidance on NPPG).⁸

| Scale of Harm | |
|----------------------------|--|
| Total Loss | Total removal of the significance of the designated heritage asset. |
| Substantial Harm | Serious harm that would drain away or vitiate the significance of the designated heritage asset |
| Less than Substantial Harm | High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset. |
| | Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material. |
| | Low level harm that does not seriously affect the significance of the designated heritage asset. |

HCUK, 2019

⁸ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

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The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, December 2024

National Planning Practice Guidance, 2019

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