

10. Cultural Heritage

Introduction

- 10.1. This chapter, which was prepared by Lanpro, presents an assessment of the likely significant Cultural Heritage effects of the Development. CVs for the competent experts responsible for preparing this chapter are provided in **Appendix 1.2, ES Volume 3**.
- 10.2. This chapter provides a description of the methods used in the assessment. This is followed by a description of the relevant baseline conditions of the Application Site and surrounding area, together with an assessment of the likely significant effects of the Development during operation. Mitigation measures are identified where appropriate to avoid, reduce or offset any adverse effects identified and / or enhance likely beneficial effects. Taking account of the mitigation measures, the nature and significance of the likely residual effects are described.
- 10.3. This chapter is supported by **Figure 10.1: Site Location and Historic Environment Constraints Map**:
- 10.4. The chapter is accompanied and informed by the following appendices, provided in **ES Volume 2**:
 - **Appendix 10.1:** Heritage Statement
 - **Appendix 10.2:** Archaeological Statement
- 10.5. The assessment deals solely with the built heritage (above ground) implications of the Development and does not cover archaeological issues except where buried parts of built heritage assets are likely to be affected. In addition, there is one scheduled monument within the surrounding 500m search area. This is the asset known as, 'A moated site and associated garden earthworks 460m south east of Boys Hall' located 380m west of the Application Site. This was first designated in 1953 and amended in 1994 (NHLE 1009006). It is completely enclosed on all sides by an industrial park and by High Speed Rail 1 (HS1) to the north east. Its significance will remain unaffected by the Development and it has not been taken forward for assessment.
- 10.6. A separate Archaeological Statement has been prepared at **Appendix 10.2**, detailing the programme of archaeological mitigation undertaken in advance of the construction of the Development. The Archaeological Statement concludes that there will be no ongoing proposed Development works during the operational phase which could impact archaeological assets on the Application Site or within the 500m search area. As such, archaeological assets are not considered any further within this assessment.
- 10.7. Effects from the Development on the landscape character and views are assessed in **ES Volume 4: Landscape and Visual**.
- 10.8. This chapter is supported by the following figures, provided in **Volume 3** of this ES:
 - **Figure 10.1:** Site location and historic environment constraints map.

Legislation, Planning Policy and Guidance

- 10.9. The following comprises a summary of the key legislation, policy and guidance of relevance to this assessment. Further information is provided in **Appendix 10.1**.

Legislation

10.10. The chapter takes into account the following relevant legislation:

- *Ancient Monuments and Archaeological Areas Act (AMAAA) 1979*¹, which provides specific protection for monuments of national interest;
- *Planning (Listed Buildings and Conservation Areas) Act 1990*², which provides specific protection for buildings and areas of special architectural or historic interest; and
- *Historic Buildings and Ancient Monuments Act 1953*³, which makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Planning Policy and Guidance

10.11. The chapter takes into account the following national and local planning policy and guidance:

- National Planning Policy Framework (NPPF) December 2024, Chapter 16: Conserving and Enhancing the Historic Environment, Paragraphs 202 to 221⁴.
- National Planning Practice Guidance: Historic Environment, Paragraph: 006 Reference ID: 18a-006-20190723⁵.
- Ashford Local Plan 2030, policies SP1 and ENV13⁶.

Other Policy and Guidance

10.12. The chapter also takes into account the following additional built heritage policy, standards and guidelines:

- The former Department for Transport's *Design Manual for Roads and Bridges* ("DMRB")⁷;
- English Heritage's *Conservation Principles: Policies and guidance for the sustainable management of the historic environment*⁸;
- Historic England's *Historic Environment Good Practice Advice in Planning 2: Managing Significance in Decision Taking in the Historic Environment*⁹.
- Historic England's *Historic Environment Good Practice Advice in Planning 3: The Setting of Heritage Assets*¹⁰;
- Historic England's: *Statement of Heritage Significance: Analysing Significance in Heritage Assets*¹¹;
- The Chartered Institute for Archaeologists' *Standard and Guidance for Historic Environment Desk-based Assessment*¹².
- British Standard 7913:2013 *Guide to the Conservation of Historic Buildings*¹³
- Institute of Environmental Management and Assessment (IEMA)¹⁴
- Institute of Historic Building Conservation (IHBC) *Principles of Cultural Heritage Impact Assessment in the UK*¹⁵

Assessment Methodology and Significance Criteria

Assessment Methodology

Establishing Baseline Conditions

- 10.13. The methodology and sources consulted to establish the baseline conditions are set out in detail in **Appendix 10.1**. In summary, this entailed:
- Collating information from the Kent Historic Environment Record (HER) and the Historic England National Heritage List for England (NHLE) within a 500m search area around the Application Site, in order to set the Development within its historic context. Assets located outside of this search area were also included within the assessment for their visual and historic relationship to the Grade I listed Church of St Mary. Please see Section 5 of **Appendix 10.1** for information regarding which assets were scoped into and out of the assessment.
 - Consultation of a broad range of relevant documentary and cartographic sources, including historical maps, plans and relevant documentary sources and a site walkover.
 - Consideration of the results of the Cultural Heritage Assessment¹⁶ undertaken by Mott MacDonald in 2020 as part of the application for the construction and operation of the temporary Sevington IBF (this document is available as Appendix 2(E) within the EIA Scoping Report, see **Appendix 2.1**).
 - A site visit was undertaken Thursday 24th October 2024 in clear weather conditions to provide an assessment of the character of the Application Site and surrounding search area and appraise the potential impact of the Development on any heritage assets.

Evolution of the Baseline

- 10.14. In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)¹⁷ (EIA Regulations), the consideration of the likely evolution of baseline in the absence of the Development (i.e. should the application for the continued use and operation not be successful). This is to determine the likely effect if the Cumulative Schemes and any relevant policy designations were to come forward in the absence of the Development.
- 10.15. In the event that the Development is not granted by 31 December 2025, elements of the Application Site would be reinstated to mitigate the impact to the historic environment and include:
- Most operational elements of the temporary IBF, including buildings and lighting, would be removed, leaving areas of open hardstanding for potential future use.
 - Proposed creation of footpaths and walkways for public use.
 - Proposed addition of information boards, with potential interactive elements such as brass rubbings, regarding the Church of St Mary, Sevington and the Royal Observer Corps Post.
- 10.16. This reinstatement would result in some beneficial impact to the Church of St Mary. The proposed introduction of information boards and reintroduction of trails through the area within the Application Site would result in greater public understanding of the asset, which would have a minor beneficial impact. Landscaping associated with the scheme, intended to remain

permanently, would reduce the adverse impact of the retention of areas of hardstanding and loss of agricultural land within the setting of the church.

Assessment Methodology

- 10.17. The methodology for assessing predicted impacts and effects upon the cultural heritage resource would follow the guidance provided in the Highways Agency's *Design Manual for Roads and Bridges (DMRB)*¹. This methodology was designed for the assessment of impacts and effects resulting from road construction, but it is also a useful approach to the assessment of other development schemes. The original methodology was developed in consultation with the key historic environment stakeholders in the UK, including English Heritage (in their role at the time as non-departmental public body advising the British Government, a role now fulfilled by Historic England) and the Institute for Archaeologists (now the Chartered Institute for Archaeologists - CIfA). The original methodology has also been adapted for this assessment to take cognisance of the updated national planning policy contained within the NPPF, and more recent guidance concerning assessment of significance and impacts to setting¹⁰.
- 10.18. It should be noted that a new updated version of the DMRB has been published, which supersedes the original DMRB guidance document issued in 2007⁷. However, this updated methodology does not address deficiencies identified by Historic England in the previous document in terms of its failure to comply with NPPF's definition of heritage 'assets of the highest significance'. It also adopts a more simplified, generic, assessment methodology which removes the detail contained in the original document with regard to the assessment of the cultural heritage 'sub-topics'. Consequently, the original DMRB assessment methodology for cultural heritage has been retained for use in this assessment, as adapted to comply with more recent professional guidance and the NPPF terminology.
- 10.19. Following the characterisation of the baseline conditions, the methodology used to characterise the likely environmental effects on designated and non-designated heritage assets within and beyond the Application Site has entailed:
- Evaluating the significance of heritage assets, based on existing designations and considering historical, archaeological, architectural / aesthetic interest as outlined in the NPPF and Historic England's Statements of Heritage Significance as well as Historic England's *Conservation Principles* (previously English Heritage)⁸ identified four high level values: evidential, historic, aesthetic and communal;
 - Predicting the magnitude of impact (change) upon the known or potential heritage significance of assets and the likelihood and resulting significance of environmental effect as a result of the Development, including considering embedded mitigation measures;
 - Considering any additional mitigation that might be required in order to avoid, reduce or off-set any significant negative effects; and
 - Quantifying any residual effects (those that might remain after additional mitigation).
- 10.20. The proposed approach is set out in [Table 10.1](#).

Table 10.1: Assessment Approach

Likely Significant Effect	Worst-case Assessment Approach
The permanent and non-reversible impacts to the setting of designated heritage assets as a result of operation phase impacts. This includes a permanent increase in visual and noise impacts resulting from increased vehicle traffic. It also includes an urbanising effect from permanent buildings, hardstanding and lighting within the setting of the asset.	An assessment of the Application Site would present a worst-case scenario.

- 10.21. The Development is for the continued use and operation of the Sevington IBF. As such, this Chapter does not consider construction phase impacts.

Significance Criteria

- 10.22. Significant effects are likely to occur when a sensitive receptor is subject to an impact of a considerable magnitude. The significance of the effect on the receptor or receptors in question is a product of considering the magnitude of the impact having regard to the sensitivity of the receptor.
- 10.23. The following sections define the methodology for determining both the sensitivity of the receptor and the magnitude of impacts in relation to Cultural Heritage, followed by a matrix which can then be used to determine the significance of the resultant effects.

Sensitivity of Receptor

- 10.24. The NPPF defines significance (hereby referred to as value/sensitivity) as 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be historic, archaeological, architectural or artistic.' The determination of the value/sensitivity is based on its statutory designation and/or professional judgement for archaeological remains, depending on the nature, extent and preservation of these remains, in relation to these values (also identified in Historic England Statements of Heritage Significance, 2019). However, unless the nature and exact extent of buried heritage assets within any given area has been determined through prior investigation, value/sensitivity is often uncertain.
- 10.25. The criteria to establish the value/sensitivity of assets are provided in **Table 10.2** below.

Table 10.2: Value / Sensitivity of Heritage Assets

Value / Sensitivity	Heritage Asset Description
Very High (e.g. International)	World Heritage Sites Other buildings or structures of recognised international importance
High (e.g. National)	Scheduled Monuments Grade I and II* Listed Buildings Grade I and II* Registered Historic Parks and Gardens Non-designated assets of equivalent heritage significance which are potentially nationally important
Medium (e.g. Regional / County)	Grade II Listed Buildings Grade II Registered Historic Parks and Gardens Conservation Areas Regionally important archaeological features and areas (as defined in the HER)

Value / Sensitivity	Heritage Asset Description
Low (e.g. Local)	Locally Listed Buildings Non-designated archaeological sites of local value, and/or potential to contribute to local research objectives
Negligible	Heritage assets with very little or no surviving research value Assets compromised by poor preservation and/or poor contextual association, or very common archaeological features/buildings of little or no value at local or other scale
Unknown	Heritage assets for which current level of understanding is insufficient to allow significance to be determined.

Magnitude of Impact (Change)

- 10.26. Determination of magnitude of impact (change) upon the value of known or potential heritage assets is based on the severity of the likely impact (e.g., the truncation or removal of buried archaeological remains, physical effects on built heritage assets or the permanent presence of new structures etc. that result in changes to the contribution of setting to the heritage significance of a built heritage asset).
- 10.27. The assessment is based on the criteria set out by the Highways England Design Manual for Roads and Bridges (DMRB) and is a clear way of understanding the magnitude of impact (change), and how levels of effect vary according to the significance of the heritage asset.
- 10.28. **Table 10.3** describes the criteria used in this assessment to determine the magnitude of impact (change).

Table 10.3: Magnitude of Impact (Change)

Magnitude of Impact (Change)	Description of Impact
Major Beneficial	The proposed changes will significantly improve the overall setting and character of heritage assets, revealing and/or enhancing important characteristics which were previously unknown or inaccessible. There would be a substantial improvement to important elements of the asset.
Moderate Beneficial	The proposed changes will considerably improve the setting or overall character of the heritage asset. There may be an improvement in key uses and beneficial impact (e.g. the creation of coherency) to the characteristics of the asset.
Minor Beneficial	The proposed changes may cause a minor improvement to the setting or overall character of a heritage asset.
Neutral	The proposed changes will have no impact on the heritage asset.
Minor Adverse	The proposed changes will have minor impact on the setting or overall character of a heritage asset. Change of this magnitude may be acceptable if suitable mitigation is carried out.
Moderate Adverse	The proposed changes will negatively alter the setting or overall character of the heritage asset. It will likely disturb key features and detract from the overall heritage significance. Change of this magnitude should be avoided where possible but can be minimised or neutralised through positive mitigation.

Magnitude of Impact (Change)	Description of Impact
Major Adverse	The proposed changes will significantly damage the overall setting and/or character of heritage assets. They will cause a notable disruption to, or in some cases, complete destruction of, important features. Change of this magnitude should be avoided.

Significance of the Effect

- 10.29. The significance of the effect from the Development on the heritage significance of any given asset, is a function of the significance of that asset and the magnitude of change that would be caused by the Development. This is summarised in **Table 10.4**.

Table 10.4: Significance of Effect Matrix

Criteria		Heritage Value/Importance				
		Neutral	Low	Medium	High	Very high
Magnitude of Impact (Change)	Major Beneficial	Negligible effect	Beneficial effect of minor significance	Beneficial effect of moderate significance	Beneficial effect of major significance	Beneficial effect of major significance
	Moderate Beneficial	Negligible effect	Beneficial effect of minor significance	Beneficial effect of minor to moderate significance	Beneficial effect of moderate to major significance	Beneficial effect of major significance
	Minor Beneficial	Negligible effect	Negligible to beneficial effect of minor significance	Beneficial effect of minor significance	Beneficial effect of minor to moderate significance	Beneficial effect of moderate to major significance
	Neutral	Negligible effect	Negligible effect	Negligible effect	Negligible effect	Negligible effect
	Minor Adverse	Negligible effect	Negligible to adverse effect of minor significance	Adverse effect of minor significance	Adverse effect of minor to moderate significance	Beneficial effect of moderate to major significance
	Moderate Adverse	Negligible effect	Adverse effect of minor significance	Adverse effect of minor to moderate significance	Adverse effect of moderate to major significance	Adverse effect of major significance
	Major Adverse	Negligible effect	Adverse effect of minor significance	Adverse effect of moderate significance	Adverse effect of major significance	Adverse effect of major significance

- 10.30. For the purpose of the assessment, those effects assessed to be 'negligible' and 'minor' are considered to be 'not significant', and those effects assessed to be moderate and major are considered to be 'significant'. Those impacts which are identified to 'minor to moderate', will be determined to be 'not significant' or 'significant' based on review of available evidence and information, and through the utilisation of professional judgement.

- 10.31. As set out in **Chapter 2: EIA Methodology** (refer to **Table 2.1**) effects are also assigned descriptors to confirm the nature (direct or indirect), temporal scale (short-term, medium-term or long-term), permanence (temporary or permanence), type (beneficial or adverse) and spatial scale (site, neighbourhood, local, regional or national).

Assumptions, Exclusions and Limitations

- 10.32. There are no assumptions and limitations relevant to the Cultural Heritage assessment.
- 10.33. General assumptions and limitations which apply to all technical chapters are set out in **Chapter 2: EIA Methodology**.

Consultation

- 10.34. Kent County Council and Historic England were consulted ahead of the construction of the temporary IBF.
- 10.35. KCC was consulted on 11 September 2024 to agree the assessment methodology, this was followed by a meeting with Wendy Rogers (KCC Heritage Conservation Officer) on 16 October 2024. During the meeting, it was agreed that the impact to heritage assets, resulting from construction, could be scoped out on the pre-text that an archaeological statement would be provided as a technical appendix (see **Appendix 10.2**).
- 10.36. Consultation regarding the methodology for the cultural heritage assessment was undertaken via the EIA scoping consultation process. The key points raised in these consultation responses, together with a commentary regarding how they have been addressed, are summarised in **Table 10.5**.

Table 10.5: Issues raised in the EIA Scoping Opinion – Cultural Heritage

Summary of Key Issue	How has this been addressed	Where is this addressed in the ES
The ES should clearly outline all heritage assets which will be considered as part of the assessment (including a map of the heritage assets in respect of the Site) and sufficient justification should be provided with regards to the heritage assets which will be scoped out of the assessment. (para 5.6.2)	Section 5 of the Heritage Statement describes the assets considered within the assessment and those that were scoped out and why.	Assets are identified in Figure 10.1 . Paragraph 10.12 of the ES directs the reader to the relevant section (Section 5) within the Appendix 10.1 regarding scoping.
KCC Heritage Conservation has noted that post-excavation reporting is ongoing. The Development should be assessed for construction phase archaeology impacts to acknowledge any potential significant or non-significant effects that may have already occurred as well as to identify whether the mitigation still	The archaeological work to date, and the significance of archaeological assets have been detailed in the Archaeological Desk Based Assessment (ADBA), which concludes that no construction or operation phase impacts will occur. A programme of post-excavation archaeological publication and archiving is underway and is sufficient to	Appendix 10.2

Summary of Key Issue	How has this been addressed	Where is this addressed in the ES
underway is sufficient for the assessment or whether any other post-excavation activities would be of further use. (para 5.6.5)	mitigate archaeological impacts of the Development.	
KCC Heritage Conservation has noted the potential for indirect operational impacts on the Bronze Age Barrow, surviving parts of the Anglo-Saxon Cemetery, and the ROC structure. An operational phase assessment should be scoped in or further scoping out text should be provided in the ES. (para 5.6.6)	Assessment of the ROC Structure is assessed within the Heritage Statement. Details of the Scheduled Monument (Bronze Age Barrow, surviving parts of the Anglo-Saxon Cemetery) and reasoning for scoping out the Scheduled Monument is provided in this ES chapter.	Appendix 10. Paragraph 10.34 of this ES Chapter and Appendix 10.1.
As noted by KCC Heritage Conservation, indirect effects on heritage assets are not just related to visibility – effects associated with additional M20 traffic, operational noise and vibration and light pollution should also be considered. (para 5.6.9)	An assessment has been undertaken to address the indirect effects above just visibility.	Paragraph 10.49 and Appendix 10.1.
The ES should also consider the current joint Institute of Environmental Management and Assessment (IEMA) / Chartered Institute for Archaeologists (CiFA) / Institute of Historic Building Conservation (IHBC) guidance document 'Principles of Cultural Heritage Impact Assessment in the UK' (July 2021). (para 5.6.11)	This guidance has been considered for this assessment.	Paragraphs 10.9 to 10.11

Summary of Construction-related Effects

- 10.37. As the IBF is already built and operational, construction impacts were scoped out of the ES. However, in response to the EIA Scoping Request, ABC requested a summary of construction effects within each relevant ES chapter.
- 10.38. The findings of the cultural heritage assessment, set out within the March 2022 SDO may be summarised as:

A full assessment of construction effects on heritage assets is in Appendix E [of the Analysis of Likely Environmental Effects of the Development, 2022]. No direct impacts are expected, but temporary visual and noise-related changes may affect the settings of nearby listed buildings, including the Grade I-listed Church of St Mary and several Grade II-listed buildings. Given existing noise from the M20, HS1, and industrial areas, these effects are minor and not significant.

Archaeological investigations will follow the Written Scheme of Investigation (WSI) adapted for the Scheme in consultation with Kent County Council (KCC). Recording and interpretation of finds will mitigate any adverse effects.

In the Eastern Compound, some high-potential surface deposits may be permanently lost, but survey and evaluation agreed with KCC will reduce impacts. Similarly, archaeological evaluation in the Eastern Land will inform landscape and biodiversity design, preserving high-value remains where possible.

The Royal Observer Corps monitoring post will be protected and unaffected.

With mitigation in place, no significant effects on cultural heritage are expected.

Baseline Conditions

Pre-Development Baseline (Application Site)

- 10.39. The Cultural Heritage Assessment¹⁶ presents the baseline conditions of the Application Site prior to 2020. This comprised an area of pastoral and arable farmland either side of Highfield Lane, Kent. However, the Application Site comprises land west of Highfield Land. The Pre-Development Baseline of the Application Site includes the Stour Park West scheme which was approved in 2015, and the RMA for Phase 1A (for estate roads, landscaping and drainage) which was approved in 2019. Initial works, associated with the RMA, were being implemented in 2020. The rural character of the landscape, therefore, has been undermined to some degree by the Stour Park development. In addition, the character of the Application Site has also been encroached on by the expansion of Ashford and construction of transport infrastructure. The A2070 and the M20 are located to the north and the High Speed Rail 1 (HS1) into Ashford is located to the south.
- 10.40. The Cultural Heritage Assessment¹⁶ identified that there are no Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, or World Heritage Sites within the Application Site. There is, however, one non-designated heritage asset within the Application Site: Royal Observer Corps underground monitoring post, Sevington (**Table 10.5**).
- 10.41. The Historic England National Heritage List for England (NHLE) and the Kent Historic Environment Record (HER) were consulted regarding built heritage assets within the Application Site. These were undertaken to support the 2020 SDO application.

Table 10.6: Non-designated heritage assets located within the Application Site

HER Reference	Description
MKE15672, TR04SW126	Royal Observer Corps underground monitoring post, Sevington.
	This was a Cold War monitoring post that was built by the Royal Observer Corps and was in operation between June 1961 and October 1968.

Existing Baseline (Surrounding Area)

- 10.42. The Historic England NHLE and the Kent HER were re-consulted regarding built heritage assets within the 500m search area. A site visit was undertaken in October 2024 to provide an

assessment of the character of the Application Site and surrounding search area and appraise the potential impact of the Development on any heritage assets.

- 10.43. The Heritage Statement ([Appendix 10.1](#)) identified Scheduled Monuments, Registered Park and Gardens, Conservation Areas and Designated heritage assets within the wider 500m search area around the Application Site. The radius of the search area was determined based on the prevailing circumstances within the surroundings, the nature of the proposals and professional judgment, as suitable for determining the potential impact of the proposed scheme on designated heritage assets. However, for purposes of the assessment, selected designated heritage assets were considered beyond this search area for their relevance to assets considered by this scheme. The Heritage Statement ([Appendix 10.1](#)) provides further information on the search area.

Scheduled Monuments

- 10.44. The 500m search area contains one Scheduled Monument that is included on Historic England's *National Heritage List for England* (NHLE), as detailed in [Table 10.6](#) below. The location of this asset is depicted on [Figure 10.1](#) and explained further within the Heritage Statement in [Appendix 10.1](#), which also contains further detailed information concerning this asset.

Table 10.7: Scheduled Monuments within the 500m search area

NHLE	Description	Proximity to the Application Site
1009006	A moated site and associated garden earthworks 460m south east of Boys Hall	380m west

Registered Park and Gardens

- 10.45. The 500m search area contains one Registered Park and Garden that is included on Historic England's *National Heritage List for England* (NHLE), as detailed in [Table 10.7](#) below. The location of this asset is depicted on [Figure 10.1](#) and explained further within the Heritage Statement in [Appendix 10.1](#), which also contains further detailed information concerning this asset.

Table 10.8: Registered Park and Gardens within the 500m search area

NHLE	Description	Proximity to the Application Site
1001291	Hatch Park Registered Park and Garden (Grade II listed)	480m east

Conservation Areas

- 10.46. The 500m search area contains one Conservation Area that is included on Historic England's *National Heritage List for England* (NHLE), as detailed in [Table 10.8](#) below. The location of this asset is depicted on [Figure 10.1](#) and explained further within the Heritage Statement in [Appendix 10.1](#), which also contains further detailed information concerning this asset.

Table 10.9: Conservation Areas within the 500m search area

NHLE	Description	Proximity to the Application Site
N/A	Lacton Green Conservation Area	450m north

Designated Heritage Assets

- 10.47. The 500m search area contains 14 listed buildings that are included on Historic England's *National Heritage List for England* (NHLE), as detailed in **Table 10.9** below. The location of this asset is depicted on **Figure 10.1** and explained further within the Heritage Statement in **Appendix 10.1**, which also contains further detailed information concerning this asset. In addition to these assets, the Grade I listed Church of St John the Baptist (NHLE 1276693) located 1.5km south east of the site has been included within the assessment for its visual and historic relationship with the Church of St Mary located within the search area.

Table 10.10: Designated Heritage Assets within the 500m search area

NHLE	Description (Designation)	Proximity to the Application Site	Scoped In
1233902	Church of St Mary (Grade I listed)	20m west	Y
1276693	Church of St John the Baptist (Grade I listed)	1.5km south-east	Y
1276463	Court Lodge (Grade II listed)	100m west	Y
1276464	Barn About 20 Metres South East of Court Lodge (Grade II listed)	100m west	Y
1233932	Ashdown Ashdown Cottage (Grade II listed)	20m south	Y
1233763	Orchard Cottage (Grade II listed)	20m south	Y
1233936	Maytree Cottages (Grade II listed)	20m south	Y
1233764	Bridge Cottage (Grade II listed)	20m south	Y
1233755	Ransley Cottage (Grade II listed)	300m east	Y
1233971	Imber (Grade II listed)	100m south west	N
1233753	Barn/Garage About 20 Metres West of Redbur (Grade II listed)	400m east	N
1276462	Redbur (Grade II listed)	400m east	N
1276471	Milestone at TR 045 412 (Grade II listed)	235m north east	N
1300063	Summerhill (Grade II listed)	375m north	N
1071057	Walnut Tree House (Grade II listed)	490m north	N

Sensitive Receptors

- 10.48. Sensitive receptors have been identified, following the baseline review, as set out in **Table 10.11** and in **Figure 10.1**.

Table 10.11: Sensitive Receptors – Listed Buildings

Receptor Name / Location	Description	OS grid reference / distance and direction from Application Site boundary	Sensitivity (Low / Medium / High / Very High)
Church of St Mary (1233902)	Grade I listed building	TR 03705 40875 / 20m west	High
Church of St John the Baptist (Grade I listed)	Grade I listed building	TR 05262 39374 / 1.5km south-east	Medium
Court Lodge (Grade II listed)	Grade II listed building	TR 03606 40845 / 100m west	Medium
Barn About 20 Metres South East of Court Lodge (Grade II listed)	Grade II listed building	TR 03614 40818 / 100m west	Medium
Ashdown Ashdown Cottage (Grade II listed)	Grade II listed building	TR 03576 40573 / 20m south	Medium
Orchard Cottage (Grade II listed)	Grade II listed building	TR 03536 40475 / 20m south	Medium
Maytree Cottages (Grade II listed)	Grade II listed building	TR 03643 40408 / 20m south	Medium
Bridge Cottage (Grade II listed)	Grade II listed building	TR 03750 40364 / 20m south	Medium
Ransley Cottage (Grade II listed)	Grade II listed building	TR 04731 40883 / 300m east	Medium

Assessment of Likely Significant Operational Effects

Embedded Mitigation and Design Features (Inherent Mitigation)

- 10.49. A series of mitigation measures were employed to lessen the indirect impacts to the nearby designated heritage assets. The Cultural Heritage Assessment¹⁶, undertaken as part of the works contains more information. These include but are not limited to:
- Retaining existing mature hedgerow at the north-west of the scheme and hedgerows around Highfield Lane.
 - Landscaping bunds and planting constructed towards the Church of St Mary to reduce the visual impact of the parking areas nearest the church (the staff car park and additional parking at the north-west).
 - Woodland understorey and specimen tree planting used on the immediate east of Highfield Lane and extending across the south, with a viewing corridor in line with the two church spires, creating a natural visual barrier in views from the east.
 - Landscaping north of Church Road and towards Bridge Cottage from Highfield Lane to create green space towards these assets.
 - Landscape bunds to provide visual and acoustic screening. Retaining an existing mature tree line, with glimpses of the church between trees, to the north of the Church of St Mary (MM002)

- Use of timber noise barriers, with planting or greening in front, which was employed instead of concrete in order to reduce visual intrusion from the barriers. The size of noise barriers was kept to the minimum height and length required to be effective. Noise mitigation was also designed to avoid impeding on the viewing corridor between the two Grade I listed churches.

10.50. An assessment of listed buildings was completed within a Heritage Statement which supports this Development (**Appendix 10.1**). The Heritage Statement considered 14 listed buildings within the surrounding 500m search area and an additional asset, the Grade I listed Church of St John the Baptist (NHLE 1276693) located 1.5km south east of the Application Site. This was included for its visual and historic relationship with the Church of St Mary located within the search area. Of these, the Church of St Mary (paragraph 10.51 below) was the only asset considered to have a potential significant effect. A further six assets had Minor Adverse magnitude of change (Not Significant) and are not considered any further within this ES Chapter. In addition, the assessment concluded a negligible magnitude of change (Not Significant) upon the remaining assets, which were subsequently scoped out of **Table 10.9**.

Indirect impact on the Church of St Mary – Operation Phase impacts from the continued use and operation of the Sevington IBF

- 10.51. The Church of St Mary is a Grade I listed asset of high sensitivity. Activities associated with the continued use and operation of the Sevington IBF have the potential to permanently detract from the significance the asset derives from its setting. Those which are considered to have Minor Adverse effects upon the Church of St Mary ('not significant' in EIA terms) are not considered below. The permanent operation of the Sevington IBF would retain goods vehicle parking for up to 855 vehicles. This would result in permanent and non-reversible visual and noise impacts as a result of increased vehicle traffic. However, visual and noise impacts are already prominent within the setting of the asset. In addition, embedded mitigation further reduces these impacts. The resulting effect would therefore be **permanent, long term, local, adverse and of minor effect, and considered not significant**.
- 10.52. The permanent operation of the Sevington IBF would retain built forms that interrupt the historical and visual relationships between the Church of St Mary and the Church of St John the Baptist, the parish churches of the neighbouring settlements of Sevington and Mersham. This would result in permanent and non-reversible impacts to the relationships between the assets. However, a viewing corridor built approximately along the former Public Right of Way further reduces this impact and the assets otherwise maintain their overall architectural and aesthetic prominence. The resulting effect would therefore be **permanent, long term, local, adverse and of minor effect, and considered not significant**.
- 10.53. The permanent operation of the Sevington IBF would retain hardstanding, buildings and lighting within the setting of the asset. Collectively these have an urbanising effect that erodes the rural character of the asset. While embedded mitigation has offset this impact to a degree, the asset derives some significance from the Application Site and this would be removed as part of the Development. However, the assets relationship with the Application Site area has been undermined by the Stour Park West scheme and the RMA for Phase 1A (for estate roads, landscaping and drainage). As such the significance which the asset derives from the Application Site area is considered to be reduced. Although, the land which comprises the area within the Application Site forms part of the historic setting of the asset, as this land use likely dates back to

the construction of the church. This combined with the combined impacts to the asset as a result of permanent and non-reversible vehicle and noise impacts from vehicle traffic and the impacts to the historical and visual relationships between the Church of St Mary and the Church of St John, although not significant by themselves, compound this harm. As such, the resulting effect would therefore be **permanent, long term, local, adverse** and of **moderate effect**, and considered **significant**.

Mitigation and Enhancement Measures and Likely Residual Operational Effects

Other Mitigation and Enhancement Measures

- 10.54. There would be further mitigation and enhancement of the assets which surround the Application Site upon the full maturity of trees and vegetation planted as part of the embedded mitigation. The landscape mitigation to the overall character of the designated heritage assets since the new planting would assist with framing and softening within the landscape. No additional mitigation is required.

Summary of Likely Significant Operational Effects

- 10.55. **Table 10.12** summarises the likely significant effects, identified mitigation measures and the likely residual operational effects identified within this chapter.

Table 10.12: Summary of Likely Significant Operational Effects

Issue	Likely Significant Effect	Mitigation Measures	Likely Residual Effect
Church of St Mary	Local, permanent, long-term, indirect, moderate adverse effect. Significant.	No additional mitigation proposed beyond the embedded mitigation discuss in this chapter .	Local, permanent, long-term, indirect, moderate adverse effect. Significant.

Monitoring

- 10.56. No monitoring is proposed to monitor the Cultural Heritage effects of the Development.

Assessment of Future Effects

Evolution of the Baseline

- 10.57. Should the Development not be granted full planning consent by 31 December 2025, all infrastructure except drainage and road infrastructure would be removed from within the Application Site, and the Site reinstated (as required under the SDO), leaving only areas of hardstanding in the once operational plots, together with the internal estate roads, drainage infrastructure and SuDS, landscaping and areas of open space.
- 10.58. If full planning permission for the Development is not granted, it is anticipated that a scheme, similar to the previous outline permission, could be implemented at the Application Site.

Cumulative Effects Assessment

- 10.59. In accordance with **Chapter 2: EIA Methodology**, this assessment includes the Cumulative Effects Assessment of the following schemes:
- 18/00098/AS - Waterbrook Park, Waterbrook Avenue, Sevington, Kent
 - PA/2024/0260 - Waterbrook Park, Waterbrook Avenue, Sevington
- 10.60. The Waterbrook Park schemes, located 800m south of the Application Site (18/00098/AS and PA/2024/0260), are the closest schemes to the Application site. These schemes are located within the immediate vicinity of the extant Ashford International Truck Stop on the western side of High Speed Rail 1 (HS1). While these schemes are separated from the Application Site by modern developments, these schemes have the potential to have a cumulative effect to impact the Grade II listed assets to the west of the Application Site, namely:
- Bridge Cottage (NHLE 1233764)
 - Maytree Cottages (NHLE 1233936)
 - Orchard Cottage (NHLE 1233763)
 - Ashdown Ashdown Cottage (NHLE 1233932)
- 10.61. However, these assets otherwise maintain their architectural and aesthetic prominence, and importantly, their relationships with Church Road and Highfield Lane. Therefore, this effect is considered to be negligible (not significant). The cumulative effects would not impact any other designated heritage asset that was scoped into this assessment. Of the other schemes within the vicinity of the site, none are visible or appreciable from the Application Site and none share any particular relationship with the Application Site.

Indirect impact on the Church of St Mary – Operation Phase impacts from the continued use and operation of the Sevington IBF

- 10.62. There is no cumulative effect as a result of these proposed schemes which are located significance distances away and are obscured by intervening built forms and topography. As such, the assessment of effects upon the Church of St Mary would remain Moderate Adverse effects (i.e., effects that are 'significant'), as per the Development in isolation.

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- ⁵ National Planning Practice Guidance: Historic Environment, Paragraph: 006 Reference ID: 18a-006-20190723
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- ¹⁶ Mott MacDonald (2020) Cultural Heritage Assessment: Sevington Inland Border Facility
- ¹⁷ Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)