

# Environmental Statement

Volume 2: Appendices (Chapter 10)



## **Appendix 10.1**

### **Heritage Statement**



# Heritage Statement

Sevington Inland Border Facility, Ashford



# Heritage Statement

**Sevington Inland Border Facility, Ashford**

Waterman Infrastructure & Environment Ltd

January 2025

(Updated June 2025)

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## Issue Sheet

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### Heritage Statement:

5507H Sevington Inland Border Facility, Ashford

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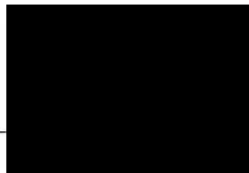
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### APPENDIX 1    DEVELOPMENT

## Non – Technical Summary

Lanpro Services Limited was commissioned by Waterman Infrastructure & Environment Ltd to produce a heritage statement to secure full planning permission for the Sevington Inland Border Facility (IBF) in Sevington, Ashford (NGR 603926 140758). The existing IBF currently operates under a temporary planning permission which will expire on 31<sup>st</sup> December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundaries of Ashford Borough Council and Kent County Council.

The heritage statement addresses the information requirements set out in the NPPF and provides the proportionate response sought by the NPPF. This heritage statement does not consider archaeological remains.

The Development would result in permanent operation phase impacts, including:

- Goods vehicle parking for up to 855 vehicles, resulting in permanent visual and noise impacts as a result of increased vehicle traffic,
- Permanent hardstanding, buildings and lighting, and
- Permanent timber barrier walls and security fencing.

The Development does not physically impact any designated or non-designated heritage asset. There is one non-designated heritage asset located within the Application Site, the Royal Observer Corps underground monitoring post, Sevington (MKE15672, TR04SW126). However, this remains in situ as part of the Development and the Development results in no harm to the asset.

Within the wider 500m search area there is one Grade II listed registered park and garden and one scheduled monument. Neither of which would be impacted by the Development and are not taken forward for assessment. There are 14 listed buildings within the surrounding 500m search area. Of these, eight have been taken forward for assessment due to their proximity and relationship with the Application Site. In addition to these assets, the Grade I listed Church of St John the Baptist (NHLE1276693) located 1.5km south east of the Application Site has been included within the assessment for its visual and historic relationship with the Church of St Mary located within the search area.

The assessment determines that the Development results in a permanent urbanising affect that changes the rural character of the area. It is acknowledged that the rural character of the area had already been changed to a degree by the Stour Park West scheme and the RMA for Phase 1A (for estate roads, landscaping and drainage). However, the Development includes hardstanding, buildings and lighting as well as permanent noise and visual impacts from increased vehicle traffic. However, mitigation measures were employed during the construction of the temporary IBF to lessen the indirect impacts to the nearby designated heritage assets as a result of the urbanising effects of the scheme. Some of these such as tree planting are yet to fully develop.

The assessment concludes that, under the terms of the National Planning Policy Framework, there is ‘less than substantial harm’ to the significance of:

- One Grade I listed building, within the middle of the scale.
- Six Grade II listed buildings.

Paragraph 215 of the NPPF is therefore engaged which states the following that “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*”. In accordance with paragraphs 212 and 214 of the NPPF, a balanced judgement will be required and weighed in the planning balance, given their significance and the merits of the proposed development.

The assessment concludes that, under the terms of the National Planning Policy Framework, there is ‘no harm’ to the significance of:

- One Grade I listed building.
- One Grade II listed building.

## **1 Introduction**

### **1.1 Summary**

- 1.1.1 This heritage statement (HS) has been prepared by Lanpro Services Limited on behalf of Waterman Infrastructure & Environment Ltd to produce a heritage statement to secure full planning permission for the Sevington Inland Border Facility (IBF) in Ashford (NGR 603926 140758). The existing IBF currently benefits from a temporary planning permission which will expire on 31st December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundary of Ashford Borough Council and Kent County Council.
- 1.1.2 This heritage statement has been prepared in compliance with the National Planning Policy Framework (NPPF 2024), to identify and provide a description of the significance of heritage assets on or adjacent to the Application Site and the likely effects of development on that significance.
- 1.1.3 The following report makes reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition, relevant Historic England guidance, notably the recently published *HEAN 12: Statements of Heritage Significance* (Historic England 2019), *GPA3: The Setting of Heritage Assets* (Historic England 2017) and *Conservation Principles* (English Heritage 2008) has been consulted to inform the judgements made.
- 1.1.4 The conclusions reached in this report are informed by detailed historic research, a site inspection and the application of professional judgement based on historic, archaeological, architectural or artistic interest.
- 1.1.5 This heritage statement does not consider archaeological heritage assets.



## 2 Legislation, Policy and Guidance

### 2.1 General

- 2.1.1 In considering any planning application for development, the Planning Inspectorate (PINS) will be guided by current legislation, the policy framework set by government planning policy, by current Local Plan policy and by other material considerations.
- 2.1.2 The national policy framework (NPPF, DLUHC 2024) states that planning applications should consider the potential impact of the development upon heritage assets which includes both designated heritage assets (for example listed buildings and Conservation Areas) and non-designated heritage assets usually comprising assets recorded on a Local List or the Historic Environment Record.

### 2.2 Current Legislation

- 2.2.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) provides for the protection of listed buildings and Conservation Areas and is largely expressed in the planning process through policies in regional and local planning guidance, as outlined below. This act is the primary legislative instrument addressing the treatment of listed buildings and Conservation Areas through the planning process.
- 2.2.2 Section 66 of the 1990 Act states that *‘...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’*.
- 2.2.3 Buildings on the list are graded to reflect their relative architectural and historic interest, based on the below:
- Grade I buildings are of exceptional interest;
  - Grade II\* buildings are particularly important buildings of more than special interest;
  - Grade II buildings are of special interest, warranting every effort to preserve them.
- 2.2.4 In addition to the statutory criteria for listing, i.e. architectural and historic interest, and group value, the following general principles are also considered by the Secretary of State when determining if a building is suitable for addition to the list of building of special architectural and historic interest:
- 2.2.5 **Age and rarity:** the older a building is, and the fewer the surviving examples of its kind, the more likely it is to have special interest. The following chronology is meant as a guide to assessment; the dates are indications of likely periods of interest and are not absolute. The relevance of age and rarity will vary according to the particular type of building

because for some types, dates other than those outlined below are of significance. However, the general principles used are that:

- before 1700, all buildings that contain a significant proportion of their original fabric are listed;
- from 1700 to 1840, most buildings are listed;
- after 1840, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary;
- particularly careful selection is required for buildings from the period after 1945;
- buildings of less than 30 years old are normally listed only if they are of outstanding quality and under threat.

2.2.6 **Aesthetic merits:** the appearance of a building, both its intrinsic architectural merit and any group value, is a key consideration in judging listing proposals, but the special interest of a building will not always be reflected in obvious external visual quality. Buildings that are important for reasons of technological innovation, or as illustrating particular aspects of social or economic history, may have little external visual quality.

2.2.7 **Selectivity:** where a building qualifies for listing primarily on the strength of its special architectural interest, the fact that there are other buildings of similar quality elsewhere is not likely to be a major consideration. However, a building may be listed primarily because it represents a particular historical type in order to ensure that examples of such a type are preserved. Listing in these circumstances is largely a comparative exercise and needs to be selective where a substantial number of buildings of a similar type and quality survive. In such cases, the Secretary of State's policy is to list only the most representative or most significant examples of the type.

2.2.8 **National interest:** the emphasis in these criteria is to establish consistency of selection to ensure that not only are all buildings of strong intrinsic architectural interest included on the list, but also the most significant or distinctive regional buildings that together make a major contribution to the national historic stock. For instance, the best examples of local vernacular buildings will normally be listed because together they illustrate the importance of distinctive local and regional traditions. Similarly, for example, some buildings will be listed because they represent a nationally important but localised industry, such as shoemaking in Northamptonshire or cotton production in Lancashire.

2.2.9 **State of repair:** the state of repair of a building is not a relevant consideration when deciding whether a building meets the test of special interest. The Secretary of State will list a building which has been assessed as meeting the statutory criteria, irrespective of its state of repair

2.2.10 Section 72 of the 1990 Act adds that '*...with respect to any buildings or other land in a Conservation Area, of any powers under any of the provisions mentioned in subsection (2),*

*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*

2.2.11 As far as Section 72 is concerned, it has previously been established by the Courts that development which does not detract from the character or appearance of a Conservation Area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively ‘enhance’.

2.2.12 This assessment also takes into account the following legislation:

- *Ancient Monuments and Archaeological Areas Act (AMAAA) 1979*, which provides specific protection for monuments of national interest;
- *Historic Buildings and Ancient Monuments Act 1953*, which makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

## **2.3 National Planning Policy Framework**

2.3.1 Section 16 of the NPPF (DLUHC 2024), entitled ‘Conserving and enhancing the historic environment’ provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets.

2.3.2 Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development,
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment, and
- Conservation of England's heritage assets in a manner appropriate to their significance.

2.3.3 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 207 states that planning decisions should be based on the significance of the heritage asset (and any contribution made by its setting), and that the *‘level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal upon their significance’*. This is supported by paragraph 208 which states that LPAs should take this into account when considering applications.

2.3.4 Paragraphs 212-215 consider the impact of development proposals upon the significance of designated heritage assets. Paragraph 212 states that where a development is proposed that would affect the significance of a designated heritage asset *‘great weight should be given to the asset’s conservation (and the more important the asset, the greater this weight should be)’*. Paragraph 215 emphasises that *‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits’* of the scheme, bearing in mind the great weight highlighted in Paragraph 212.

2.3.5 Heritage Assets are defined in Annex 2 of the NPPF as: *‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)’.*

2.3.6 A Designated Heritage Asset comprises a *‘World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.’*

2.3.7 In short, government policy provides a framework which:

- Protects nationally important designated heritage assets,
- Protects the settings of such designations,
- In appropriate circumstances seeks adequate information (from desk-based assessment and field evaluation where necessary) to enable informed decisions, and
- Provides for the recording of sites not significant enough to merit in situ preservation.

## 2.4 Planning Practice Guidance

2.4.1 The Planning Practice Guidance (MHCLG 2024) is a web-based resource which is to be used in conjunction with the NPPF. It is aimed at planning professionals and prescribes best practice within the planning sector. The relevant section is entitled ‘Conserving and enhancing the historic environment’. The guidance given in this section sets out the best practice to applying government policy in the NPPF. It provides an interpretation for each of the interests assigned to heritage assets in understanding significance: archaeological, architectural and artistic, and historic (Paragraph: 006 Reference ID: 18a-006-20190723).

## 2.5 Local Planning Policy

### Ashford Borough Local Plan 2030

2.5.1 Ashford Borough Council adopted the Ashford Borough Local Plan 2030 in February 2019. The following policies are considered relevant to heritage.

#### Policy SP1 – Strategic Objectives

*c. To conserve and enhance designated and non-designated heritage assets and the relationship between them and their settings in a way that promotes distinctive places, proportionate to their significance. Place-based heritage will be a key principle underpinning design and spatial form of development...*

### **Policy ENV13 – Conserving and Enhancement of Heritage Assets**

*Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.*

*Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss.*

*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.*

*All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.*

## **2.6 Professional Guidance**

- 2.6.1 The ClfA *Standard and Guidance for Historic Environment Desk-based Assessment (2020)* provides guidelines and recommendations for best practice in undertaking archaeological desk-based research and assessment.
- 2.6.2 This document has also been prepared in accordance with the general guidelines set out in British Standard 7913:2013 *Guide to the Conservation of Historic Buildings*.
- 2.6.3 Guidance on the implementation and interpretation of historic environment policy has been provided by the Historic England publications *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (GPA2, 2015)* and the *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets (GPA3, 2017)*.
- 2.6.4 Historic England's GPA2 outlines a seven-stage process for the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:
- Understand the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment,
  - Understand the significance of the affected assets,
  - Understand the impact of the proposal on that significance,
  - Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF,



- Look for opportunities to better reveal or enhance significance,
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change, and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

2.6.5 In order to understand the nature, extent and level of significance GPA2 advocates considering the four types of heritage value an asset may hold, as identified in *Conservation Principles* (English Heritage 2008): *aesthetic, communal, historic* and *evidential*. However, NPPF (2024) has since provided a definition of significance dependant on the following four interests: archaeological, architectural and artistic, or historic (para 2.4.1, above). The following assessment of significance results from a combination of any, some or all of these values and interests.

2.6.6 Historic England's GPA3 recognises that whilst setting is not a heritage asset, 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*' (para. 4). Setting is described as being distinct to curtilage, character and context. This guidance also notes that the contribution of setting to the significance of a heritage asset is often expressed by reference to views, although the importance of setting lies in what it contributes to the significance of the heritage asset, and this can be influenced by a number of other factors.

2.6.7 The Historic England advice note, *Statement of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12* (HEAN 12, 2019), brings together all of the above guidance in an analysis of an appropriate approach for applicants for heritage and other consents in providing an understanding of the significance of heritage assets in line with NPPF. It emphasises the level of detail required in support of both planning and listed building consent applications, which should be no more than is necessary, i.e. proportionate to the significance of the heritage asset affected, to reach an informed decision.

## 3 Methodology

### 3.1 General Induction

- 3.1.1 The purpose of a heritage statement is to meet the requirements of the NPPF and any local plans, in order to inform planning decisions when considering proposals that have the potential to have an impact, directly or indirectly, upon a heritage asset. It is not concerned with other planning issues.
- 3.1.2 The degree of impact on heritage assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.
- 3.1.3 Under the requirements of national and local policy and in line with professional guidance, the process of heritage impact assessments can be summarised as involving three parts:
1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings,
  2. understanding the nature and extent of the proposed development,
  3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.

### 3.2 Information sources

- 3.2.1 Table 1, below, provides a summary of the key data sources used to inform the production of this HS. Occasionally there may be reference to assets beyond the Application Site or surrounding search area, where appropriate, e.g. where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.

**Table 1: Summary of data sources**

Source	Data	Detail
Historic England	Statutory designations and an understanding of their special interest	National Heritage List for England (NHLE), Heritage Gateway
Local Authority	Local plan document and guidance to steer development and conservation	Local Plan, Local Historic Environment Records (HER), Heritage Gateway
Historic Mapping	Indication of the development of settlements and landscape through time	Ordnance Survey (OS) maps from the first edition through to present day, Estate plans, Tithe maps etc.
Online Sources	Web-published local history, grey literature, archival catalogues, social media	British Newspapers Online, The Genealogist, Blackwell's mapping

Archives	Historic archives collections	Historic photographs from the 19 <sup>th</sup> century through to present day
Libraries	Public and private libraries	Secondary literature including architects' monographs, topographical surveys
Client information	Plans, proposals, design intent and known parameters	Plans, elevations and sections of existing buildings, proposed development plans, other technical reports

### 3.3 Site Visit

- 3.3.1 A site visit was undertaken Thursday 24<sup>th</sup> 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 (Plates 1-25).

### 3.4 Assessment Criteria

#### Significance

- 3.4.1 NPPF defines significance as:

*The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

- 3.4.2 Historic England's *Conservation Principles* (previously English Heritage, 2008) identified four high level values: evidential, historic, aesthetic and communal. NPPF (2024) defines significance in the planning context as resulting from the heritage interest of an asset determined by the following:

- **Archaeological Interest:** the potential of an asset to yield evidence of past human activity that could be revealed through future investigation. Archaeological interest includes above-ground structures, as well as earthworks and buried or submerged remains.
- **Architectural and Artistic Interest:** derives from a contemporary appreciation of an asset's aesthetics. Architectural interest is an interest in design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right

- **Historic Interest:** the way in which an asset can illustrate the story of past events, people and aspects of life (illustrative value, or interest). It can be said to hold communal value when associated with the identity of a community.

- 3.4.3 These values or interests encompass the criteria that Historic England are obliged to consider when statutorily designating heritage assets.
- 3.4.4 There are no single defining criteria that dictates the overall asset significance; each asset has to be evaluated against the range of criteria listed above on a case-by-case basis. These values are not intended to be restrictive but are identified in order to help establish a method for thinking systematically and consistently about the heritage values that can be ascribed to a place and contribute to a heritage asset's significance.
- 3.4.5 In relation to a recognised heritage asset, the production of this HS also takes into account the contribution which the historic character and setting makes to the overall significance of the asset.
- 3.4.6 The relative contribution of the heritage values to the significance of the heritage asset(s) are graded as either high, medium, low, neutral/negligible (informed by ICOMOS (2011) and Historic England guidance) and illustrated in Table 2, below.

**Table 2: Significance of a heritage asset**

Heritage significance	Description
Very High	World Heritage Sites (WHS)
High	Scheduled Monuments (SM), Grade I and II* Listed Buildings, Grade I and II* Registered Historic Parks and Gardens
Medium	Grade II Listed Buildings Grade II Registered Historic Parks and Gardens Conservation Areas
Low	Locally Listed Buildings Non-designated heritage assets
Negligible/nil	Heritage assets with very little or no surviving research value

## Setting

- 3.4.7 The NPPF defines the setting of a heritage asset as:

*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

3.4.8 Historic England's GPA3, The Setting of Heritage Assets Setting (2017), was used to inform the methodology for this assessment. The guidance recommends that a systematic and staged '5-step process' to assessment should be adopted, to which this HS has adopted steps i) to iv):

- i. *identify which heritage assets and their settings are affected,*
- ii. *assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated,*
- iii. *assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it,*
- iv. *explore the way to maximise enhancement and avoid or minimise harm,*
- v. *make and document the decision and monitor outcomes.*

3.4.9 The production of this HS has taken into account the physical and sensory surroundings of the asset, in order to understand the contribution 'setting' makes to the heritage significance of the asset(s). This has included topography and intervening development and vegetation. It also considers how the asset is currently experienced and understood through its setting, in particular views to and from the asset and the Application Site, along with key views, and the extent to which setting may have already been compromised.

3.4.10 The relative contribution of the heritage values to the significance of the asset(s) are graded as either high, medium, low, neutral or detrimental.

### **Definition of Harm**

3.4.11 Current guidance by Historic England is that 'change' does not equate to 'harm'. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – substantial and less than substantial (paragraphs 214 and 215).

3.4.12 In determining the effects of the proposed scheme this assessment is cognisant of case law. In particular, that for Flag Station, Mansel Lacy, Herefordshire [22/09/2015] Case Number EWHC 2688, wherein it emphasised the primacy of the 1990 Planning Act and the fact that it is up to the decision makers in the planning system to '*have special regard to the desirability of preserving the [listed] building or its setting*'. HH Judge David Cooke stated, in regards to an impact on the setting of a listed building, (Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383) para.34):

*It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.*

3.4.13 The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:



*It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.*

### **Methodology for assessing harm**

3.4.14 Heritage impact is defined as the potential level of harm or benefit to special architectural or historic interest caused by proposed development. The NPPF stresses that impacts on heritage assets should be avoided and if it cannot be avoided, it should be minimised or mitigated. The NPPF does not prescribe a format or title for analyses of heritage significance and/or impact. The following methodology is based on the guidance set out in HEAN12 (2019):

- Assessment of impact:
  - Effect on fabric
  - Effect on setting
  - Cumulative impact
- Avoiding harmful impact(s),
- Enhancing significance,
- Justification for harmful impacts.

### **Assessment of impact**

3.4.15 Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Section 8 assesses the effect of the proposals on fabric, setting and cumulative impact on significance. A level of relative impact (major, moderate, minor or negligible) will be assigned to the proposal. Impact may also be beneficial and defined under the NPPFs sustainable development criteria of social, economic or environmental.

### **Avoiding Harmful Impact(s)**

3.4.16 Harm to heritage assets should be avoided and if it cannot be avoided, it should be minimised or mitigated. This section will set out how decisions have been taken in the interest of the heritage asset to avoid harm, and if this is not possible, how risk has been mitigated or minimised through design changes.

### **Enhancing Significance**

- 3.4.17 Impact may also have public benefits that can be defined as social, economic or environmental. Heritage benefits such as repairs and reinstatement can be defined as environmental benefits. Any outcomes of the scheme that will enhance significance will be articulated here.

#### **Justification for harmful impacts**

- 3.4.18 Where a proposed development will lead to substantial or less than substantial harm, the proposals must achieve substantial public benefits that outweigh that harm or weigh the harm against the public benefits, respectively (NPPF paragraph 213 - 215). The proposals will be justified under the NPPF's sustainable development criteria of social, economic or environmental.

### **3.5 Planning history**

#### **Extant Application**

- 3.5.1 Much of the land, covered by the Application Site, was subject to an outline planning application (reference 14/00906/AS), which was accompanied by an ES. Outline planning consent was granted in September 2017:
- 'Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq m comprising: up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m of sui generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping.'*
- 3.5.2 To discharge Condition 1A of the outline permission, a Reserved Matters Application for Phase 1A (reference 19/00579/AS) was submitted and works implemented in 2019:
- 'Approval of the appearance, landscaping, layout and scale of the 'Phase 1A works' being the works comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space)'*

## **4 Site Appraisal**

- 4.1.1 The Application Site comprises the existing temporary Sevington IBF located on the western side of Highfield Lane, Kent. It lies between Sevington, on the eastern edge of Ashford, and the village of Mersham (NGR 603926 140758).
- 4.1.2 To the north and west of the Application Site the character of the search area is largely defined by modern developments. The expansion of Ashford comprising housing estates, Ashford Retail Park and Waterbrook Park now dominate this part of the settlement. In addition, the M20 and the junction 10A are located to the north of the Application Site. To the south of the Application Site is Church Road, a semi-rural street lined with residences, beyond which lies the route of High Speed Rail 1 (HS1) into Ashford. The A2070 Bad Munstereifel Road is located c.150m west of the order land boundary. Noise and light pollution from road, rail and commercial and industrial units at the edge of Ashford can be observed within the Application Site. However, the village character of Mersham is maintained by the rural and semi-rural fields which surround it, albeit with changes to this setting that were already permitted by 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.
- 4.1.3 The character of the areas surrounding the Application Site are fields and villages of a rural and semi-rural nature; however, this has been encroached on by the expansion of Ashford and construction of transport infrastructure including the M20 and the A2070.

## 5 Heritage Assets

- 5.1.1 The Historic England National Heritage List for England (NHLE) and the Kent Historic Environment Record (HER) have been consulted regarding built heritage assets within the Application Site and the surrounding 500m search area (Figure 1). The radius of the search area has been 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. It is, therefore, consistent with paragraph 207 of the NPPF, in providing a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. However, for purposes of this assessment, selected designated heritage assets have been considered beyond this search area for their relevance to assets considered by this scheme.
- 5.1.2 The Application Site is not located within any conservation area. However, the Lacton Green Conservation Area is located 450m north of the Application Site (Figure 1). While the impact of the Development on the special interest of a conservation area is a material consideration in the planning process, the Development would not change the character and appearance of the Lacton Green Conservation Area. This is located a sizeable distance from the Application Site and on the opposite side of the M20 and a large shopping estate. As such, it would not be affected at all by the Development and has not been taken forward for assessment.
- 5.1.3 There is one Grade II listed registered park and garden located 480m east of the Application Site. This is the Hatch Park Registered Park and Garden (NHLE 1001291; MKE76002). This is located a considerable distance from the Application Site and on the opposite side of the M20 and Hythe Road. As such, it would not be affected at all by the Development and has not been taken forward for assessment.
- 5.1.4 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.
- 5.1.5 There are 14 listed buildings within the surrounding 500m search area (Figure 1). These comprise one Grade I listed asset and 13 Grade II listed assets. Of these, eight have been taken forward for assessment due to their proximity and relationship with the Application Site. The remaining assets have been scoped out of further consideration as they are screened from the Application Site by their surrounding contexts and setting. Their significance will remain unaffected by the Development. In addition to the above mentioned 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.

- 5.1.6 The HER records one non-designated heritage asset within the Application Site boundary. This has been taken forward for assessment. In addition, there are five non-designated heritage assets within the 500m search area. Of these, none are taken forward for assessment as their significance would remain unaffected as a result of the Development.

## **6 Historical Development**

- 6.1.1 This section provides an overview of the Application Site and the historical background relevant to an understanding of the Application Site and its historic context and interest. This is based on accessible records. It is not the purpose of this document to create a detailed historical narrative of the area, but to provide an assessment of the Application Site's historical development and heritage potential in accordance with the NPPF.
- 6.1.2 By the medieval period there were established settlements in Mersham, Sevington and Willington/Ashford, with settlements recorded in the Domesday Book in 1086. The Church of St Mary in Sevington (NHLE 1233902) was constructed as the parish church in the 12th century and gradually extended over the next two centuries. The settlement, much as today, was small and centred on the church which served the farming community.
- 6.1.3 The Church of St John the Baptist (NHLE 1276693) in neighbouring Mersham followed the same pattern of constriction in the 12th century and expansion in the 13th and 14th. The two churches have interconnected history representing neighbouring parishes with parallel construction.
- 6.1.4 Ashford's cattle market was first held in 1243, when the town was granted a charter by Henry III, and had become one of the most important in Kent by the 17th century. Into the post medieval period a small settlement was maintained around the Church of St Mary the Virgin (MM009) and this group survives as the historic core of Willsborough in east Ashford. The surrounding rural landscape in this period was agricultural, interspersed with small settlements and large manors.
- 6.1.5 The settlements surrounding the Application Site all expanded in the post medieval period. In Ashford / Willsborough the popularity of the market led to the construction of post medieval commercial properties and row housing in the settlement core. In Sevington individual farmhouses were constructed and restored along Church Lane, mostly in the 16th-18th centuries. The church was also repaired and restored, however settlement remained comparatively small. Conversely, the settlement at Mersham grew more substantially, especially along Kingsford Street and The Street. A small number of commercial properties were also constructed in the centre of Mersham and the post medieval housing was mostly more closely spaced, creating an enclosed village centre. Towards the Application Site post medieval development on Kingsford Street comprises large individual farmhouses, similar to Church Road.
- 6.1.6 The Mersham Parish Tithe Map of 1838 (Figure 2) shows that the Application Site contains agricultural fields with small parts of Church Road, Highfield Lane and the A2070 also located within the Application Site boundary. A Public Right of Way (PRoW) extends approximately east – west across the Application Site. The Tithe apportionment data (Table 1) shows that the majority of the Application Site was owned by William Golding and occupied by Walter Stunt. Outside of the Application Site, the built forms within Sevington are evident along Church Road in much the same format as they appear today. However, the farmstead at Court Lodge appeared in a different configuration and a rectory

was located on Church Road to the south west of the Application Site. The railway to the south west had not yet been constructed by this time.

**Table 1. Tithe apportionment data**

<b>Plot</b>	<b>Landowner</b>	<b>Occupier</b>
12	The Reverend George Norwood Rector (Glebe)	William Geering
13	William Golding	Walter Stunt
14	William Golding	Walter Stunt
15	William Golding	Walter Stunt
22	William Golding	Walter Stunt
23	William Golding	Walter Stunt
24	William Golding	Walter Stunt
25	William Golding	Walter Stunt
26	Trustees of Sevington Church	William Geering
93	William Golding	Walter Stunt
94	(No data)	(No data)
98	William Golding	Walter Stunt
99	William Golding	Walter Stunt
278	William Golding	Walter Stunt

- 6.1.7 The Ordnance Survey 24" map of 1872 (Figure 3) shows the Application Site and search area in greater detail. The London and Dover Railway had been constructed to the south west of the Application Site in what is now the location of High Speed Rail 1 (HS1). Elsewhere the search area remains relatively unchanged with the exception of the demolition of the rectory to the south of Church Lane.
- 6.1.8 The Ordnance Survey 24" map of 1896 (Figure 4) shows no real change to the Application Site or search area. However, a rectory has been constructed to the south west of Church Lane.
- 6.1.9 The Ordnance Survey 24" map of 1906 (Figure 5) shows little change to the Application Site other than a new field boundary inserted into the northern half of the Application Site



as well as a windpump to the north east. In addition, there has been some expansion of the Court Lodge farmstead with a new building constructed to the east of the Application Site in approximately a north-south alignment.

- 6.1.10 The Ordnance Survey 24" map of 1938 (Figure 6) shows the Application Site again as one field with public rights of way. Outside of the Application Site, Court Lodge has been expanded and the encroaching development of Ashford is evident within the search area. Sevington Road to the north west of the Application Site contained new housing as did Kingsford Street immediately east where large detached houses were constructed. To the north of the Application Site Hythe Road was widened with new houses built along it. The Ordnance Survey 24" map of 1954 (not reproduced) shows no change to the Application Site or search area but there is further development to the north on the outskirts of Ashford.
- 6.1.11 The search area was shaped by its role as a key defensive location and this is reflected by the former Royal Observer Corps underground monitoring post which was located within the Application Site boundary (HER: TR04SW126, MM110). The Royal Observer Corps was a civil defence organisation, active from 1925-1995, who constructed over 1500 underground monitoring posts during the Cold War. The purpose of these standard plan posts was to fulfil a reporting role in the event of nuclear conflict. They comprised an underground concrete box with above ground hatch and air intake, covered by a 4ft grass mound. The post formerly located within the Application Site opened in June 1961 and closed in October 1968.
- 6.1.12 The post war development of Kent led to the expansion of many towns, including Ashford. This is reflected by the Ordnance Survey 24" map of 1988 (Figure 7) with the newly constructed Ashford Business Park and the A2070 located immediately north west of the Application Site. In addition the M20, which was originally the A20, was expanded by this time. Investment continued into the later 20<sup>th</sup> and early 21<sup>st</sup> centuries, motivated in part by easy connections to continental Europe. The High Speed Rail 1 (HS1) rail connection, for example, was constructed between 1996-2007.

## **7 Statement of Significance**

- 7.1.1 It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain elements could accommodate change without affecting the significance of the asset. Change is only considered harmful if it erodes an asset's significance. Understanding the significance of any heritage assets affected and any contribution made by their setting (paragraph 207, NPPF 2024) is, therefore, fundamental to understanding the scope for and acceptability of change.
- 7.1.2 Based on the above evidence in Sections 5 and 6 and the on-site assessment, and in accordance with Steps 1 and 2 contained in GPA3: The Setting of Heritage Assets (Historic England 2017), the following section contains an assessment of the significance of those heritage assets considered to be potentially sensitive to or impacted by the proposals.

### **7.2 Built heritage assets located inside the Application Site**

#### **Royal Observer Corps underground monitoring post, Sevington (MKE15672, TR04SW126)**

##### **Project Background**

- 7.2.1 The Kent County Council HER records one non-designated heritage asset within Application Site boundary, the 'Royal Observer Corps underground monitoring post, Sevington' (MKE15672, TR04SW126).
- 7.2.2 Following approval for the temporary IBF on 1<sup>st</sup> December 2020, Condition 4 required the photographic recording of this asset:
- Prior to the implementation of relevant works, information confirming vegetation clearance that might affect the Royal Observer Corps underground monitoring post and a photographic record of the above ground remains are to be submitted to and approved in writing by the Secretary of State.*
- 7.2.3 A formal response by Mott MacDonald (2020b) addressed Condition 4. This was left in situ during the construction of the temporary Sevington IBF.

##### **Description**

- 7.2.4 The Royal Observer Corps was a civil defence organisation, active from 1925-1995, who constructed over 1500 underground monitoring posts during the Cold War. The purpose of these standard plan posts was to fulfil a reporting role in the event of nuclear conflict. They comprised an underground concrete box with above ground hatch and air intake, covered by a 4ft grass mound. The post within the Application Site was known to have operated between June 1961 and October 1968 when it ceased to operate.

- 7.2.5 The post is recorded in the HER as being at NGR 604190 140530, however site investigations by WSP determined the post is located further west than recorded, at NGR 604158 140610. At this location, above ground, is a 2.0m by 1.0m raised mound of approximately 0.5m height with frequent broken concrete blocks and corroded metal objects.

#### **Historic and Architectural Interest**

- 7.2.6 The asset is of historic interest for its relationship with the Royal Observer Corps. The asset derives significance from its associative and illustrative historic value as a surviving example of cold war architecture. However, the asset has long since been out of use and it is and is likely in a to be in a poor condition. As such, the contribution to the assets significance is limited. It also derives some archaeological interest from the parts of the post which remain in situ. In the broadest sense, the asset derives some very limited historic interest through its relationship with wider Ashford.

#### **Contribution made by setting**

- 7.2.7 The Royal Observer Corps underground monitoring post, Sevington is positioned on what was an empty field to the south east of the Church of St Mary. Having long been detached from its historical use as an observer post, the asset does not derive any particular significance from the Application Site.

### **7.3 Built heritage assets located outside of the Application Site**

#### **Church of St Mary (NHLE 1233902)**

- 7.3.1 The Church of St Mary is a Grade I listed building that was designated in 1957 (Plate 1 and Plate 2). It is located 20m from the western part of the site boundary.



**Plate 1. Church of St Mary, facing north**



**Plate 2. The church spire, facing south**

### **Description and Historic Interest**

- 7.3.2 It is a ragstone structure with a plain tiled roof and timber framed porch. The church was first constructed in the 12<sup>th</sup> century and extended in multiple phases from the 13<sup>th</sup> and 14<sup>th</sup>

centuries. The roofline of the asset is evident of the various phases of construction and modification that has formed the asset (Plate 1). The nave and aisle are composed within a single catslide roof and the chapels to the east are within separately gabled roofs. The tower to the west is a two stage tower with a broach spire (Plate 2). The church was restored in 1877 and 1936.

- 7.3.3 The church has high historic interest as the parish church of what is now the parish of Sevington with Finberry (formerly Sevington). It has been the centrepiece of the community's religious history for over 800 years, including christenings, weddings, and funerals. Services and ceremonies are still conducted at the church, and it remains at the heart of the local community. The significance the asset derives from this historic interest is enhanced by this communal value as the parish church, albeit, church attendance has diminished in recent years. This historic interest is further enhanced by the shrine in the chapel to notable local Lawrence Banks (1726-1830) and the early 19<sup>th</sup> century Royal Arms in the nave.

#### **Architectural interest**

- 7.3.4 The Church of St Mary has high architectural interest owing to its scale and massing as a 12<sup>th</sup> century church, albeit with much alteration. It has architectural interest derived from its designed and fortuitous aesthetic value, evident in the range of architectural styles present within its form. Although all represent designed phases, their piecemeal addition to the building creates a fortuitous palimpsest. It has been extended over multiple phases of construction and modification since its construction in the late medieval period, such as the restorations in 1877 and 1936. It contains a chancel and south chapel, nave and south aisle with a south porch and a tower to the west. These phases create a harmonious, if irregular plan, and together contribute towards the overall significance of the asset.
- 7.3.5 Internally, a number of features contribute to the architectural interest of the building, and its overall significance (Plate 3 and Plate 4). The interior features a double chamfered 14<sup>th</sup> century tower arch and the catslide roof contains a trussed rafter and tie beam roof construction. There is also a tomb recess in the south chapel and a recess in the north nave wall.





**Plate 3. General shots of the church interior, facing west and east**



**Plate 4. The church roof structure, facing east**

### **Contribution made by setting**

- 7.3.6 The Church of St Mary is positioned within a treelined churchyard and accessible from Church Road to the north west along a walking path. Church Road is located in close

proximity to Bad Munsterifel Road A2070, a dual carriageway with a pedestrian and cycle overpass. The church yard is sited within an agricultural field surrounded by a public walkway to the north and east.

- 7.3.7 The asset is best experienced from within the churchyard itself, where the architectural and aesthetic prominence of the asset is most clearly evident. However, there is also appreciation of the church tower in select long views from across the search area. This includes views across the Application Site from the walking tracks which surround it. Outside of the Application Site the tower is visible from the east on Bad Munsterifel Road A2070 (Plate 5) and to lesser degree from the west along Church Road where this is not obscured by farm buildings, vegetation and topography. Dense vegetation and designed landscaping associated with the A2070 dual carriageway has largely obscured the asset when viewed from the north. Despite this partial screening, the construction of the A2070 has significantly undermined the setting of the asset and noise impacts from vehicle traffic are very prominent within its setting. The High Speed Rail 1 (HS1) is also located approximately 400m south west of the asset, with noise impacts further detracting from the setting of the asset. Despite this erosion of the asset's setting, it remains a prominent landmark. The style of the church tower is reflected by a similarly styled tower at a nearby large Tesco's shopping precinct.
- 7.3.8 The Application Site, which comprises a sizable portion of the parish, makes a limited contribution to the significance of the asset by forming what was agricultural land of some importance to the parish. However, this relationship was altered by 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. These developments eroded the agricultural character of the asset to a degree. Yet despite this, the asset otherwise maintains its architectural and aesthetic prominence within the churchyard, itself largely screened by mature trees from the surrounding areas. Importantly, the asset otherwise maintains its principal historic relationships to the parish of Sevington with Finbury as well as the wider Ashford Area.
- 7.3.9 The asset has associative value with the Church of St John the Baptist located 2.1km to the south east in the village of Mersham. Both assets form the parish church to each respective parish. These villages were accessible along a historic PRoW thus the assets share something of a visual relationship, forming a landmark to each parish that would have been visible when moving between each parish.



**Plate 5. The Church of St Mary, facing south west from the A2070**

### **Church of St John the Baptist (NHLE 1276693)**

- 7.3.10 The Church of St John the Baptist is a Grade I listed asset that was designated in 1957 (Plate 6). It is located 1.5km south east of the Application Site.





**Plate 6. Church of St John the Baptist, facing south**

### **Description and Historic Interest**

- 7.3.11 It is a ragstone structure with a plain tiled roof and timber framed porch. The church was first constructed in the 12<sup>th</sup> century and was extended in the 13<sup>th</sup> century with 14<sup>th</sup> or 15<sup>th</sup> century fenestrations and a 19<sup>th</sup> or 20<sup>th</sup> century vestry. It contains a chancel and south chapel, nave with a south aisle and south porch. The tower is a three stage tower with a clock on the west dated to 1886.
- 7.3.12 The church has high historic interest as the parish church of Mersham. Most likely constructed in the same century as the Church of St Mary, the Church of St John the Baptist has also been the centrepiece of the community's religious history for over 800 years. It too remains at the heart of local community life. The significance the asset derives from this historic interest is enhanced by its communal value as the parish church, albeit church attendance has diminished across the country in recent times. This

historic interest is further enhanced by many monuments and shrines within the church that are dedicated to notable locals. In addition, a Royal Arms is located on the nave north wall dated to 1751 and a lugged charity board dated to 1777 is located in the south aisle.

### **Architectural interest**

- 7.3.13 The Church of St John the Baptist has high architectural interest owing to its scale and massing as a 12<sup>th</sup> century church, albeit with much alteration. It has architectural interest derived from its designed and fortuitous aesthetic value, evident in the range of architectural styles present within its form. Although all represent designed phases, their piecemeal addition to the building creates a fortuitous palimpsest. It has been extended over multiple phases of construction and modification since its construction in the late medieval period. These phases create a harmonious, if irregular plan, and together contribute towards the overall significance of the asset.
- 7.3.14 Internally, a number of features contribute to the architectural interest of the building, and its overall significance (Plate 7 and Plate 8). The interior features an exposed roof structure with a king post and trussed rafter construction above the earlier parts of the church. Moulded timberwork, decorative stained glass windows and moulded window tracery further contribute towards the architectural interest of the asset.



**Plate 7. Stained glass window within the Church of St John the Baptist**



**Plate 8. Interior of the church**



### **Contribution made by setting**

- 7.3.15 The Church of St John the Baptist is positioned with a partly treelined churchyard and is accessible from Church Close to the north. The asset is located in close proximity with the Grade I listed Mersham Manor to the west (NHLE 1233281). The church yard is sited within a largely suburban part of Mersham with an agricultural field to the south west.
- 7.3.16 The asset is best experienced from within the churchyard itself where the architectural and aesthetic prominence of the asset is most clearly evident. Elsewhere, there is only a limited appreciation of the church tower as this remains largely obscured by built forms, vegetation and topography.
- 7.3.17 The asset has associative value with the Church of St Mary 2.1km to the north west in Sevington. Both assets form the parish church to each respective parish. These villages were accessible along a historic PRoW thus the assets share something of a visual relationship, forming a landmark to each parish that would have been visible when moving between each parish. However, this visual relationship remains largely intact through the construction of a viewing corridor designed within the temporary Sevington IBF which mitigates this impact to a large degree. The asset derives some historical interest from the stie area, which once formed agricultural lands within the jurisdiction of its parish.

### **Court Lodge (NHLE 1276463) and Barn (NHLE 1276464)**

- 7.3.18 The Court Lodge and the associated asset known as 'Barn About 20 Metres South East of Court Lodge' are Grade II listed assets that form part of the same farmstead (Plate 9). They were designated in 1952 and 1989 respectively. The group is located approximately 100m west of the Application Site.



**Plate 9. Court Lodge and Barn, facing north east from Church Road**

### **Description and Historic Interest**

- 7.3.19 Court Lodge is a house that was most likely constructed in the 16<sup>th</sup> century. It is a timber framed house clad with ragstone and red brick with a plain tiled roof. Composed over two storeys, the assets contains chimney stacks which are visible above the steeply pitched roof line. The assets contains an irregular arrangement of both historic and 20<sup>th</sup> century casement windows.
- 7.3.20 The Barn dates to at least the 18<sup>th</sup> century and is a timber frame structure clad in weatherboards and plain tiled roof. It is a single storey structure with a steeply pitched hipped roof. It contains three wooden casement windows and boarded doors.
- 7.3.21 Collectively the group are of historic interest in forming part of an important post medieval farmstead in Sevington.

### **Architectural interest**

- 7.3.22 The assets are of architectural interest as relatively intact examples of a 16<sup>th</sup> century house and an 18<sup>th</sup> century barn. Individually the assets contain elements which are of architectural merit and which contribute towards their overall aesthetic prominence. Collectively, the assets contain important architectural elements that contribute towards their understanding as vestigial buildings of a wider farmstead.

### **Contribution made by setting**

- 7.3.23 The group is positioned to the south of Church Road where a large brick wall obscures much of the farmstead from the road. The assets are positioned to the north of the extant farmstead which now comprises modern large farm buildings to the south and south east. Elsewhere, agricultural fields surround the built forms.
- 7.3.24 The group is experienced from Church Road to the north, particularly in views looking south east past the tall brick wall which lines Church Road. To some degree the group is visible in views looking south west from the access road to the Church of St Mary where views are not obscured by vegetation. However, this view is largely of Court Lodge and the modern windows which have been inserted into this elevation. The group are also partly visible in views looking northward from Church Road, yet views of the historic built forms are largely obscured by the modern farm buildings that have been constructed.
- 7.3.25 The group derives some significance from the Application Site which comprises what was formerly farmland. While modern farm buildings have been constructed within the immediate vicinity of the asset, the group maintain an architectural and aesthetic prominence. Importantly, the asset maintains an element of its rural setting through the agricultural fields that surround the assets. These fields contain horses and are appreciable in views looking north and south towards the group.

### **Group of cottages to the south of the Application Site**

7.3.26 The following group comprise four cottages located to the south west of the Application Site and in close proximity with the High Speed Rail 1 (HS1) railway line. They are all Grade II listed assets that were designated in 1989. Each asset is located no more than 20m from the southern part of the Application Site.

- Ashdown Ashdown Cottage (NHLE 1233932; Plate 9)
- Orchard Cottage (NHLE 1233763; Plate 11)
- Maytree Cottages (NHLE 1233936; Plate 12)
- Bridge Cottage (NHLE 1233764; Plate 13)



**Plate 10. The Ashdown Ashdown Cottage, facing south west from within the Application Site**



**Plate 11. Orchard Cottage, facing south west from the public walkway within the Application Site**





**Plate 12. Maytree Cottages, facing south from the public walkway within the Application Site**



**Plate 13. Bridge Cottage, facing south west along Highfield Lane**

### **Description and Historic Interest**

- 7.3.27 Ashdown Ashdown Cottage is a house, and now pair of cottages, that was constructed in the 17<sup>th</sup> century and altered in the 18<sup>th</sup> century. It is a timber framed structure clad with painted brick and a plain tiled roof. Orchard Cottage is a 17<sup>th</sup> century timber framed house clad in painted brick with a plain tiled roof. Maytree Cottages is timber framed house clad in ragstone with brick dressings and likely dates to at least the 18<sup>th</sup> century. Bridge Cottage is a 16<sup>th</sup> century timber framed and weatherboard house that was clad in ragstone and red brick sometime in the 18<sup>th</sup> century.
- 7.3.28 The assets were constructed as Sevington grew around its agricultural industries. The assets therefore are of historic interest to Sevington and are an important part of the development of Sevington.

### **Architectural interest**

- 7.3.29 Individually, the assets have architectural interest and aesthetic value through their scale and massing as post medieval houses and through details such as decorative windows, chimney stacks and their timber frame construction. In addition, their significance is enhanced by their appreciation as rural farm buildings containing catslide roof sheds on the properties. Collectively the assets contribute towards the overall street scene of Church Road and Highfield Lane as well as the character of the wider parish of Sevington with Finberry.

### **Contribution made by setting**

- 7.3.30 The assets are located to the south of Church Road and Highfield Lane within largely tree lined properties. These assets are located immediately north of High Speed Rail 1 (HS1).
- 7.3.31 The group are experienced from Church Road and Highfield Lane where the assets are not obscured by vegetation or topography. Orchard Cottage and Maytree Cottages, are to a small degree, appreciable from the PRow which extends through the Application Site. However, only the tops of the assets are visible here. Ashdown Ashdown Cottage is somewhat more visible but is also largely screened by vegetation.
- 7.3.32 The assets derive some significance from the Application Site, which comprises a large amount of what was formerly the surrounding agricultural land, albeit setting that was modified by 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. Despite this, the assets otherwise maintain their architectural and aesthetic prominence, as well as their historic interest to the wider parish as post medieval houses.

### **Ransley Cottage (NHLE 1233755)**

- 7.3.33 The Ransley Cottage (NHLE 1233755) is a Grade II listed asset that was designated in 1989 (Plate 14). It is located 300m east of the Application Site.





**Plate 14. The Ransley Cottage, facing west**

### **Description and Historic Interest**

- 7.3.34 Ransley Cottage is a timber framed house clad with galletted ragstone and red brick dressings. According to the list entry, it was constructed in the 16<sup>th</sup> century. Comprised over two storeys, the asset has a hipped roof and a northern chimney stack. It now contains the Ransley Kennels & Cattery with modern sheds and ancillary structures located to the west of the asset.
- 7.3.35 The asset was constructed in the 16<sup>th</sup> century as Sevington developed around its agricultural industries. The asset therefore is of historic interest to Sevington, forming part of its historic development. This historic interest is enhanced by the assets alleged relationship with the infamous Ransley gang of 18<sup>th</sup> and 19<sup>th</sup> century smugglers. While there is little evidence to suggest that the smugglers used this particular address with any great frequency, the Ransley Gang were known to have goods moved through east Kent and the Ashford Area.

### **Architectural interest**

- 7.3.36 The asset has architectural interest as a relatively intact example of a 16<sup>th</sup> century house. Although the area surrounding the Application Site has been extensively altered with the construction of the M20 immediately north east of the Application Site, the asset maintains a high degree of architectural and aesthetic prominence on Kingsford Street. Despite modern sheds and structures being built to the west of the asset, it maintains a relatively high degree of authenticity when viewed from the exterior, albeit with replaced windows.

### **Contribution made by setting**

- 7.3.37 The asset is positioned to the south west of Kingsford Street and lined to the west by modern sheds and ancillary structures associated with the kennels and cattery. The section of Kingsford Street within the setting of this asset is lined to the north by a modern timber fence with the M20 beyond.
- 7.3.38 The asset is experienced from the north on Kingsford Street where the asset is most clearly visible. Here, the asset has a clear northward facing aspect. There is some appreciation of the asset from further along Kingsford Road in views looking south east. However, these are obscured by a large timber fence which contains the modern kennels and cattery.
- 7.3.39 The asset derives no particular significance from the Application Site. Despite the encroachment of the M20, the rural setting of the asset is to some degree maintained by the fields to the south and west of the asset which are located between the asset and the Application Site. The asset otherwise maintains architectural and aesthetic prominence on Kingsford Street, as well as its historic relationship to the wider parish as a post medieval house.

## **8 Impact Assessment**

8.1.1 Local authorities have a duty under the 1990 Planning (Listed Buildings and Conservation Areas) Act (section 66[1]) to have special regard to the '*desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*'. The NPPF expects local authorities to have access to significance and impact assessments to inform these duties (paragraphs 207 and 208).

8.1.2 Impact is assessed according to different levels, from neutral to beneficial with a range of degrees of harm, from slight to substantial. Where substantial harm will be caused, for example by the total demolition of a listed building or a building that contributes to the character of a conservation area, local authorities should normally refuse consent, unless the criteria set out in the NPPF are met (paragraph 207). For proposals where the harm is 'less than substantial', the Local Authority is expected to weigh the harm to significance against the public benefits of the scheme.

## **8.2 Development**

8.2.1 The Development comprises the current operational IBF including:

- Goods vehicle parking for up to 855 vehicles, including 42 entry lanes with a capacity of up to 260 goods vehicles, 24 refrigerated semi-trailers and 357 staff car parking spaces;
- Border checking facilities;
- Security fencing;
- Noise attenuation bunds and fences;
- CCTV and lighting columns;
- Drainage; and
- All associated engineering and landscaping works.

8.2.2 The estate roads, sustainable drainage system and landscaping already operate under planning permission, pursuant to extant planning permission (reference 19/00579/AS).

8.2.3 Because the Sevington IBF is built and currently operational, the effects from the construction phase have already occurred and would no longer apply to this new application. As such, the current application proposes to make this a permanent facility, the following assessment will consider only the continued operation of the Application Site (permanent and non-reversible).

### **8.3 Impact assessment on built heritage assets located within the Application Site**

#### **8.3.1 Royal Observer Corps underground monitoring post, Sevington (MKE15672, TR04SW126)**

8.3.2 The ongoing operation of Sevington IBF would not physically impact the monitoring post, which remains in situ within the Application Site boundary. The Development would therefore result in no physical harm to the asset.

8.3.3 While there would be changes to the setting of the asset, as a result of the facility becoming permanent, these changes are considered to be minimal. The asset retains its associative and illustrative historic value as a surviving example of cold war architecture. It retains its historic relationships with the other military installations in the area as well as its relationship to wider Ashford. The asset is an underground facility that is not clearly appreciable from above ground and the ongoing operation of the facility would result in negligible harm to the asset.

8.3.4 Taken overall, there is no harm to this asset as a result of the Development.

### **8.4 Impact assessment on built heritage assets located outside the Application Site**

#### **Church of St Mary (NHLE 1233902)**

8.4.1 The Church of St Mary is a Grade I listed asset of high significance located 20m from the western part of the Application Site.

8.4.2 The ongoing operation of the Sevington IBF would introduce goods vehicle parking for up to 855 vehicles into the wider of the listed building. 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 as a result of vehicle traffic on the A2070 dual carriageway, located 100m north west of the churchyard. Also, noise impacts as a result of High Speed Rail 1 (HS1) located approximately 400m south west are also prominent within the setting of the asset. Therefore, while there would be impacts to the setting of the asset as a result of increased vehicle traffic, the setting of the asset is already characterised by extensive vehicle traffic. In addition, mitigation measures incorporated within the design of the temporary IBF, the Stour Park West scheme, and the RMA for Phase 1A (for estate roads, landscaping and drainage) which was approved in 2019 have reduced these impacts to a degree. These include landscaping bunds and planting that has been used to reduce visual and noise impacts from vehicle traffic to the north along the A2070 (Plate 15). Noise barriers including bunding and barrier fencing between the Application Site and the asset reduce the noise impacts from activity within the Application Site. Also, existing mature trees to the south of the asset further minimise visual impacts. The ongoing operation of the

Sevington IBF results in less than substantial harm to the asset as a result of increased visual and noise impacts from vehicle traffic. Because mitigation measures have been employed to minimise these associated impacts, and because the setting of the asset has already been eroded, this is considered to be at the lower end of the scale. This is not a significant effect.



**Plate 15. The church of St Mary as seen from the overpass over the A2070 to the north of the asset**

#### 8.4.3

As the parish church of Sevington, The Church of St Mary shares some associative value with the Church of St John the Baptist, the parish church of Mersham to the south east. The assets are located approximately 2.1km from one another but share an historical relationship as contemporary parish churches. Both assets are linked by a PRoW that is most likely an historical pathway between each village and parish (Plate 16). The view between these historical assets is a key part of their historic relationship and associative value. The Development would permanently lessen this view. However, this has been mitigated to a large degree by the construction of a viewing corridor between the assets. A viewing corridor was constructed as part of the temporary IBF which removes the upstanding elements of the Development within the vicinity of the PRoW. This has maintained the view between the assets to a large degree, and therefore the historic and associative relationships between the Church of St Mary and the Church of St John the Baptist. The PRoW would be permanently removed as part of the Development. However, alternative routes would remain available around the Application Site and so access between Sevington and Mersham is maintained. Whatsoever, in the PRoW leading between the Application Site and Mersham, both church towers are visible from these routes with the viewing corridor funnelling views westward to a degree. Therefore, there is a negligible impact upon the historic relationship and associative value shared by these assets. There is also a negligible impact to the asset as a result of visual impacts to the PRoW between the Church of St Mary and the Church of St John the Baptist. This is not a significant effect.





**Plate 16. View from Application Site towards Mersham, facing south east along the PROW**

- 8.4.4 The Development would introduce permanent hardstanding, buildings and lighting within the immediate setting of the Church of St Mary that would affect its rural character and the way in which the asset is experienced. The asset derives significance from the Application Site area which comprises a sizable portion of the parish and historically from its former use as agricultural land. What was historically farmland would be permanently urbanised. A considerable amount of this land was given over to permitted development as part of 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. This undermined the rural character of the asset but did not introduce the largely urbanising affects brought forward as part of the Development. As such, the significance the asset derives from the Application Site is significantly impacted by the Development. However, the mitigation measures employed during the construction of the temporary facility offset this impact to a degree, and many of the trees planted as part of this mitigation are not yet mature enough to fully screen the Application Site. As such the screening effect will intensify over time.
- 8.4.5 The immediate setting of the Application Site is comprised by intact agricultural fields, which together with the Grade II listed farm buildings to the south west, maintain some degree of the assets rural setting (Plate 17 and Plate 18). The visual impacts resulting from the Development are mitigated to a degree by the mature trees to the south of the asset, which allow only limited views outwards towards the Application Site (Plate 19). This is further mitigated by the barriers located between the Application Site and the asset and also by the trees planted here. Although, these trees are not yet mature and do not yet enhance screening to the extent they will do in the future.
- 8.4.6 Plate 20 shows the Application Site from the west of the Church of St Mary churchyard. The asset has inwardly focused setting, focused within the churchyard. Here the architectural and aesthetic significances of the asset are best appreciated and will be sustained by the proposals. This setting is enhanced by the assets relationship with Church Road to the north and the walking track located between them. Here, a degree of tranquility is maintained despite an awareness of the nearby A2070. While the

Development does physically alter the setting of the asset, it will maintain some degree of its rural setting. Notwithstanding, although the asset maintains much of its historical and architectural significances, a large portion of the assets setting would permanently be given over to hardstanding, buildings and lighting. When the trees planted during the construction of the temporary facility become mature, an additional layer of screening will further mitigate these impacts. As such, the Development results in a moderate level of less than substantial harm through physical impacts to the asset's immediate setting.

8.4.7 Taken overall, the Development results in permanent operation phase impacts of less than substantial harm within the middle of the scale.



**Plate 17. The Church of St Mary, facing south**



**Plate 18. The farm buildings associated with the Church of St Mary, facing south west**





**Plate 19. Glancing views of the Application Site from the churchyard, facing south east**



**Plate 20. The Application Site as seen from the west of the churchyard, facing south**

### **Church of St John the Baptist (NHLE 1276693)**

- 8.4.8 The Church of St John the Baptist is a Grade I listed asset of high significance located 1.5km south west of the Application Site.
- 8.4.9 The Application Site is located a significant distance from the asset. While there is some limited visibility of the Application Site in views facing north west, the Development would not impact the architectural and aesthetic prominence of the asset where it is principally experienced within the churchyard. It would not impact on the assets significance as a landmark in Mersham or its significance as the parish church. The principal contribution made to the significance of the asset by its setting, namely the immediate vicinity of the churchyard, would be maintained and its spatial and visual relationships with the designated heritage assets located near it, notably the Grade I listed Mersham Manor (NHLE 1233281). In this way the asset remains unaffected by the Development. However, ongoing operation of the facility has the potential to impact the assets relationship with the Church of St Mary 2.1km to the north west
- 8.4.10 As explained earlier regarding the Church of St Mary, the Church of St John the Baptist is parish church of Mersham. This shares some associative value with the Church of St Mary, the parish church of Sevington to the north west. The assets are located approximately 2.1km from one another but share an historical relationship as contemporary parish churches. Both assets are linked by a PRow that is most likely an



historical pathway between each village and parish. The view between these historical assets is a key part of their historic relationship and associative value. The Development would permanently obscure this view. However, this has been mitigated to a large degree by the construction of a viewing corridor between the assets which follows the course of the former PRoW. This PRoW would be permanently removed as part of the Development. However, alternative routes would remain available around the Application Site and so access between Sevington and Mersham is maintained. Whatsmore, from the PRoW leading between the Application Site and Mersham, both church towers are visible from this route with the viewing corridor funneling views westward to a degree. Therefore, there is a negligible impact upon the historic relationship and associative value shared by these assets. There is also a negligible impact to the asset as a result of visual impacts to the PRoW between the Church of St Mary and the Church of St John the Baptist. This is not a significant effect.

8.4.11 Taken overall, the Development would result in no harm to the asset.

#### **Court Lodge (NHLE 1276463) and Barn (NHLE 1276464)**

8.4.12 The Court Lodge and the associated asset known as 'Barn About 20 Metres South East of Court Lodge' are Grade II listed assets that form part of the same farmstead located approximately 100m west of the Application Site.

8.4.13 The ongoing operation of the Sevington IBF would introduce 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 assets as a result of vehicle traffic on the A2070 dual carriageway located 50m to the north west. Also, noise impacts as a result of High Speed Rail 1 (HS1) located approximately 300m south west are also prominent within the setting of the asset. Therefore, while there would be impacts to the setting of the asset as a result of increased vehicle traffic, the setting of the asset is already impacted by vehicle traffic. As such, this impact is considered to be a minor intensification of the existing impact, before mitigation. In addition, mitigation measures built into the design of the temporary IBF and the preceding schemes have reduced these impacts to a large degree. Noise barriers between the Application Site and the asset reduce the noise impacts from activity within the Application Site and existing modern farm buildings to the south of the asset further minimise visual impacts.

8.4.14 The Development would introduce permanent hardstanding, buildings and lighting within the immediate setting of the group that would affect its rural character and the way in which the asset is experienced. As a group of farm buildings, the assets derive significance from their rural setting. The permanent use of the facility would erode this rural character where this is not already eroded by previous permitted schemes on the site. While modern farm buildings have already eroded the architectural, aesthetic and historic significance of the group, the arable fields that surround them maintains a degree of its legibility as agricultural buildings. This rural character is clearly appreciable in views

looking north to the assets from Church Road, albeit with modern farm buildings also readable in these views (Plate 21 and Plate 22). The scheme is also appreciable from Church Road to the north where views are not obscured by modern farm buildings (Plate 23). Given that the assets maintain some degree of their rural character, the Development results in relatively minor impacts to the significance of the group.

8.4.15 Taken overall, the Development would result in less than substantial harm to the group.



**Plate 21. The agricultural fields which surround the western part of the Application Site**



**Plate 22. The agricultural fields which surround the western part of the Application Site**



**Plate 23. The Application Site as seen from the north on Church Lane**

### **Group of cottages to the south of the Application Site**

8.4.16 The following group comprise four cottages located to the south west of the Application Site and in close proximity with High Speed Rail 1 (HS1) railway line. They are all Grade II listed assets that were designated in 1989.

- Ashdown Ashdown Cottage (NHLE 1233932; Plate 10)
- Orchard Cottage (NHLE 1233763; Plate 11)
- Maytree Cottages (NHLE 1233936; Plate 12)
- Bridge Cottage (NHLE 1233764; Plate 13)

8.4.17 The Development would introduce permanent changes into the immediate setting of this group of assets. The nearest part of the Application Site comprises permanent hardstanding, buildings and lighting that would permanently impact the assets. However, ponds were built as part of the temporary IBF and the preceding schemes which soften this visual impact and these are visible from a PRoW also built within the Application Site (Plate 24). The main impact upon the asset is a high boundary fence built between 40-100m away from the asset on higher terrain. This minimises visual and noise impacts as a result of the permanent use of the facility but imposes upon setting of the group visually (Plate 25). However, the wooden materiality as opposed to the metal security fences used elsewhere softens this impact to a degree. The group otherwise maintain their relationship to Church Lane and Highfield Lane on which they are defined and experienced. These routes largely remain intact as country lanes within the vicinity of the asset. However, a security gate on Church Road minimised the rural character of this road. Importantly, each asset is generally screened from Application Site by topography and vegetation and they do not share any particular appreciation the Application Site. Noise impacts, as a result of the permanent use of the facility, would not meaningfully impact the group which has already been undermined by noise impacts from High Speed Rail 1 (HS1). Therefore, while the continued use and operation of the Sevington IBF results



in permanent changes to the setting of the asset, the asset otherwise maintains its principal architectural and aesthetic interests as well as its relationship to Church Lane.

8.4.18 Taken overall, the Development results in less than substantial harm to the group.



**Plate 24. The ponds to the south of the Application Site, facing south east**



**Plate 25. The timber boundary fences seen from the walkway within the Application Site, facing north east**

### **Ransley Cottage (NHLE 1233755)**

8.4.19 The Ransley Cottage is a Grade II listed asset of medium significance located 300m east of the Application Site.

8.4.20 The Development would introduce permanent changes into the immediate setting of the asset including hardstanding, buildings and lighting. Because the asset is located on the western side of Kingsford Street with an open aspect towards the Application Site, there is potential for intervisibility to harm the way in which the asset is experienced. However, the asset faces north east away from the Application Site to Kingsford Street where it maintains clear aesthetic and architectural prominence. Visually, the asset is further removed from the Application Site by tall fencing and by the modern kennels and cattery

that detract from its overall significance. Noise impacts from the A2070, despite tall barrier fencing, still remain prominent within the setting of the asset. Therefore, while the Development results in permanent impacts to the setting of the asset, these impacts are considered to be relatively minimal.

8.4.21 Taken overall, the Development results in no harm to the asset.

## **8.5 Summary of impact**

8.5.1 The Development would result in the continued use and operation of the Sevington IBF. This results in permanent and non-reversible changes to setting of several designated heritage assets. Overall, the assessment concludes that, under the terms of the National Planning Policy Framework (2024), there is ‘less than substantial harm’ to the significance of:

- One Grade I listed building, within the middle of the scale.
- Six Grade II listed buildings.

8.5.2 Paragraph 215 of the NPPF is therefore engaged which states the following that “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*”

8.5.3 In accordance with paragraphs 212 and 214 of the NPPF (2024), a balanced judgement will be required and weighed in the planning balance, given its significance and the merits of the proposed development.

## 9 Conclusions

### 9.1 Summary

- 9.1.1 Lanpro Services Limited was commissioned by Waterman Infrastructure & Environment Ltd to produce a heritage statement to secure full planning permission for the Sevington Inland Border Facility (IBF) in Sevington, Ashford (NGR 603926 140758). The existing IBF currently operates under a temporary planning permission which will expire on 31st December 2025 and the Development will seek full planning permission for the continued use and operation of the Sevington IBF. It is located within the administrative boundaries of Ashford Borough Council and Kent County Council.
- 9.1.2 The heritage statement addresses the information requirements set out in the NPPF and provides the proportionate response sought by the NPPF. This heritage statement does not consider archaeological remains.
- 9.1.3 The Development would result in permanent operation phase impacts, including:
- Goods vehicle parking for up to 855 vehicles, resulting in permanent visual and noise impacts as a result of increased vehicle traffic,
  - Permanent hardstanding, buildings and lighting, and
  - Permanent timber barrier walls and security fencing.
- 9.1.4 The Development does not physically impact any designated or non-designated heritage asset. There is one non-designated heritage asset located within the Application Site, the Royal Observer Corps underground monitoring post, Sevington (MKE15672, TR04SW126). However, this remains insitu as part of the Development and the scheme results in no harm to the asset.
- 9.1.5 Within the wider 500m search area there is one Grade II listed registered park and garden and one scheduled monument. Neither of which would be impacted by the Development and are not taken forward for assessment. There are 14 listed buildings within the surrounding 500m search area. Of these, eight have been taken forward for assessment due to their proximity and relationship with the Application Site. In addition to these assets, the Grade I listed Church of St John the Baptist (NHLE1276693) located 1.5km south east of the Application Site has been included within the assessment for its visual and historic relationship with the Church of St Mary located within the search area.
- 9.1.6 The assessment determines that the Development results in a permanent urbanising affect that changes the rural character of the area. It is acknowledged that the rural character of the area had already been changed to a degree by the Stour Park West scheme and the RMA for Phase 1A (for estate roads, landscaping and drainage). However, the Development includes hardstanding, buildings and lighting as well as permanent noise and visual impacts from increased vehicle traffic. However, mitigation measures were employed during the construction of the temporary IBF to lessen the indirect

impacts to the nearby designated heritage assets as a result of the urbanising effects of the scheme. Some of these such as tree planting are yet to fully develop.

9.1.7 Overall, the assessment concludes that, under the terms of the National Planning Policy Framework (2024), there is ‘less than substantial harm’ to the significance of:

- One Grade I listed building, within the middle of the scale.
- Six Grade II listed buildings.

Paragraph 215 of the NPPF is therefore engaged which states the following that “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*”. In accordance with paragraphs 212 and 214 of the NPPF, a balanced judgement will be required and weighed in the planning balance, given their significance and the merits of the proposed development.

9.1.8 The assessment concludes that, under the terms of the National Planning Policy Framework, there is ‘no harm’ to the significance of:

- One Grade I listed building.
- One Grade II listed building.

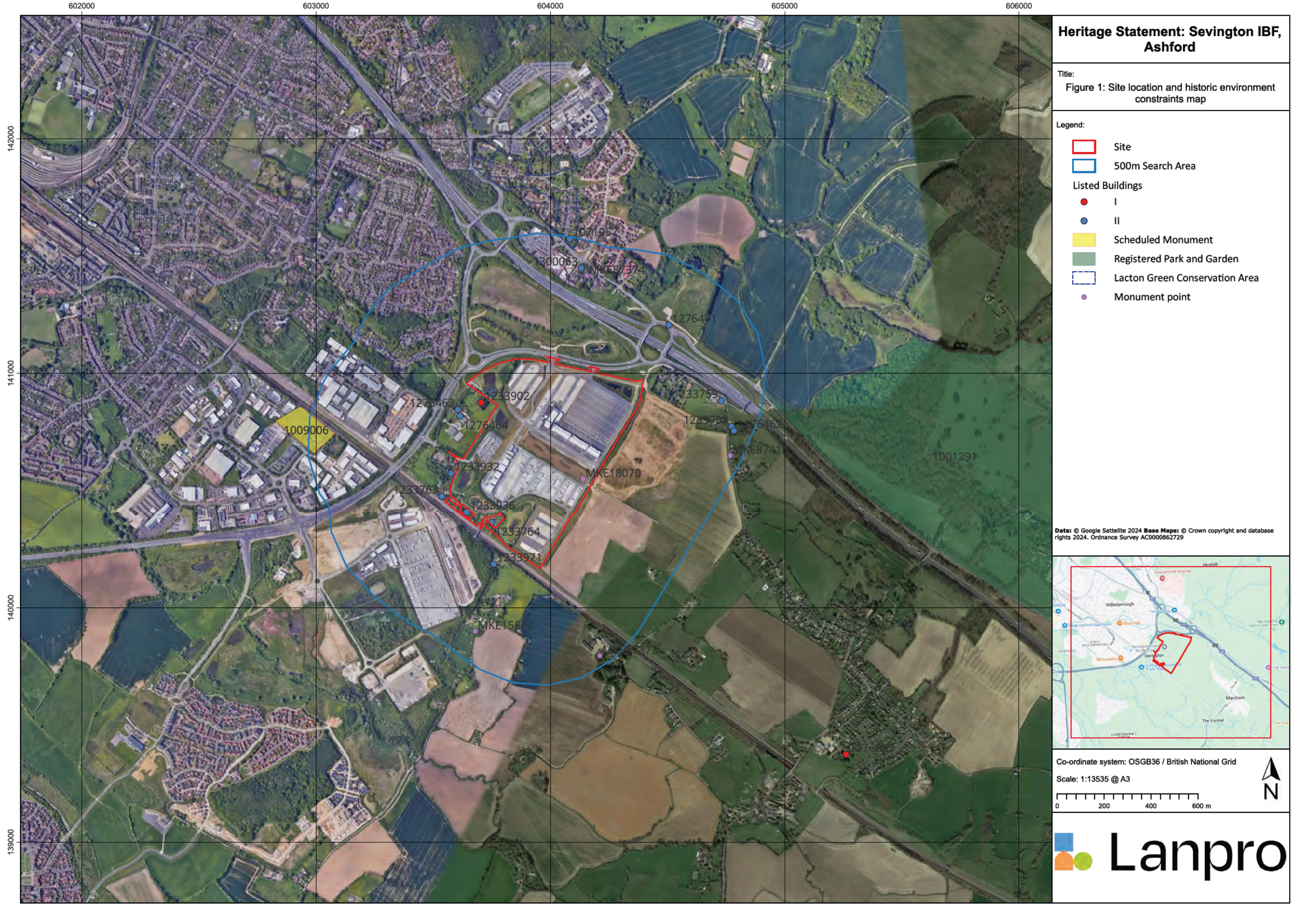
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- DCLG, 2024, National Planning Policy Framework
- English Heritage, 2008, Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment
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- Mott MacDonald, 2020a, Cultural Heritage Assessment: Sevington Inland Border Facility
- Mott MacDonald, 2020b, Response to Condition 4: Royal Observer Corps Monitoring Post, Sevington Inland Border Facility



**11       Figures**





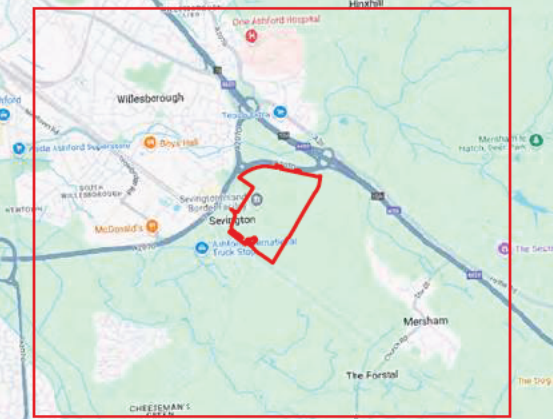
**Heritage Statement: Sevington IBF, Ashford**

Title:  
Figure 1: Site location and historic environment constraints map

Legend:

- Site
- 500m Search Area
- Listed Buildings
  - I
  - II
- Scheduled Monument
- Registered Park and Garden
- Lacton Green Conservation Area
- Monument point

Data: © Google Sattelite 2024 Base Maps: © Crown copyright and database rights 2024. Ordnance Survey AC0000862729



Co-ordinate system: OSGB36 / British National Grid  
Scale: 1:13535 @ A3



# Heritage Statement: Sevington IBF, Ashford

Title:  
Figure 2. Extract of the Sevington Parish Tithe Map of 1838

Legend:

 Site

Base Map: © Crown copyright and database rights 2024. Ordnance Survey  
AC00000862729

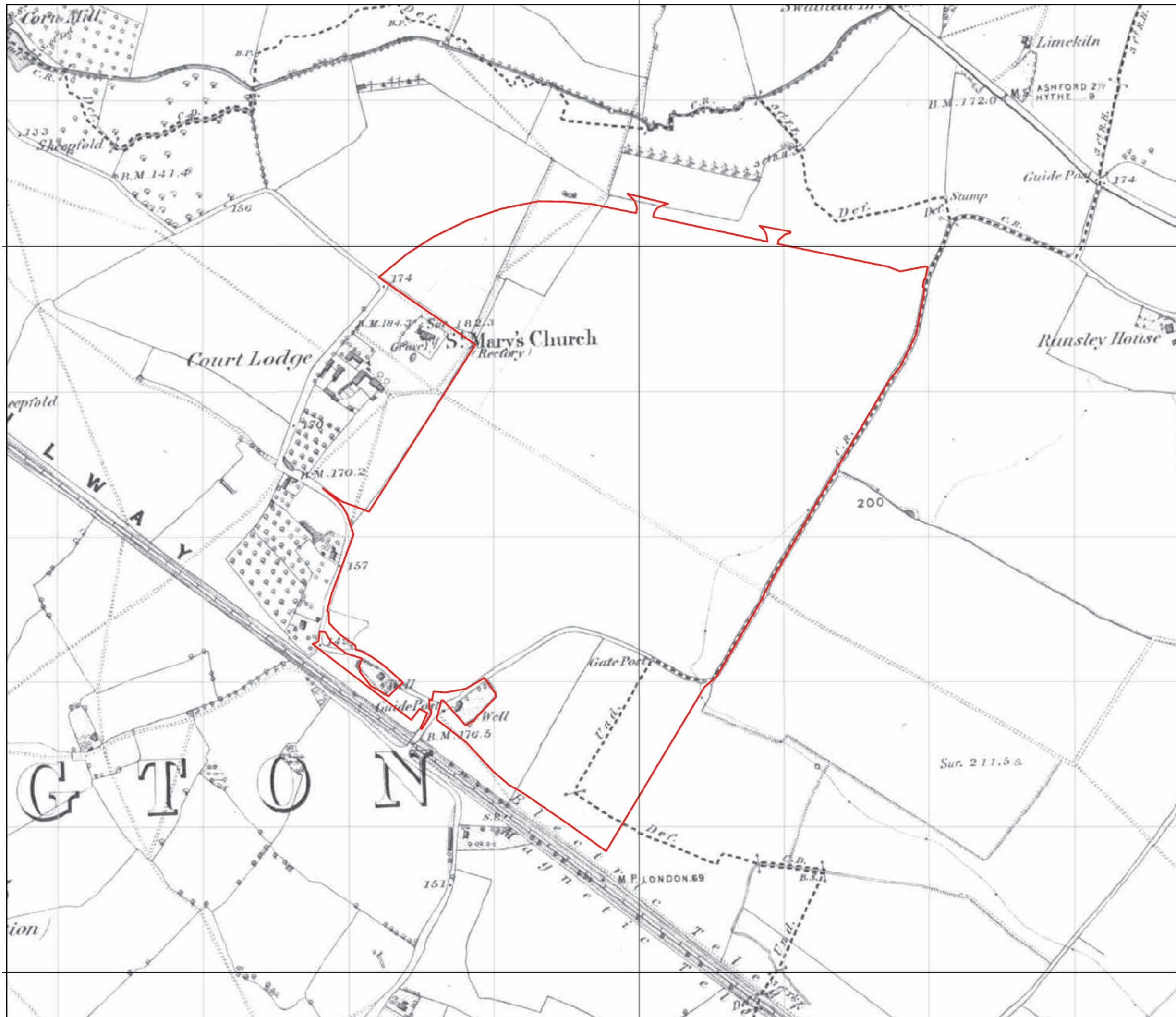
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Scale: 1:3350 @ A3

0 50 100 150 m







**Heritage Statement: Sevington IBF,  
Ashford**

Title:  
Figure 3. Extract of the Ordnance Survey 24" map of  
1872

**Legend:**

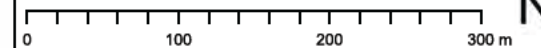


Site

Base Map: © Crown copyright and database rights 2024. Ordnance Survey  
AC0000862729

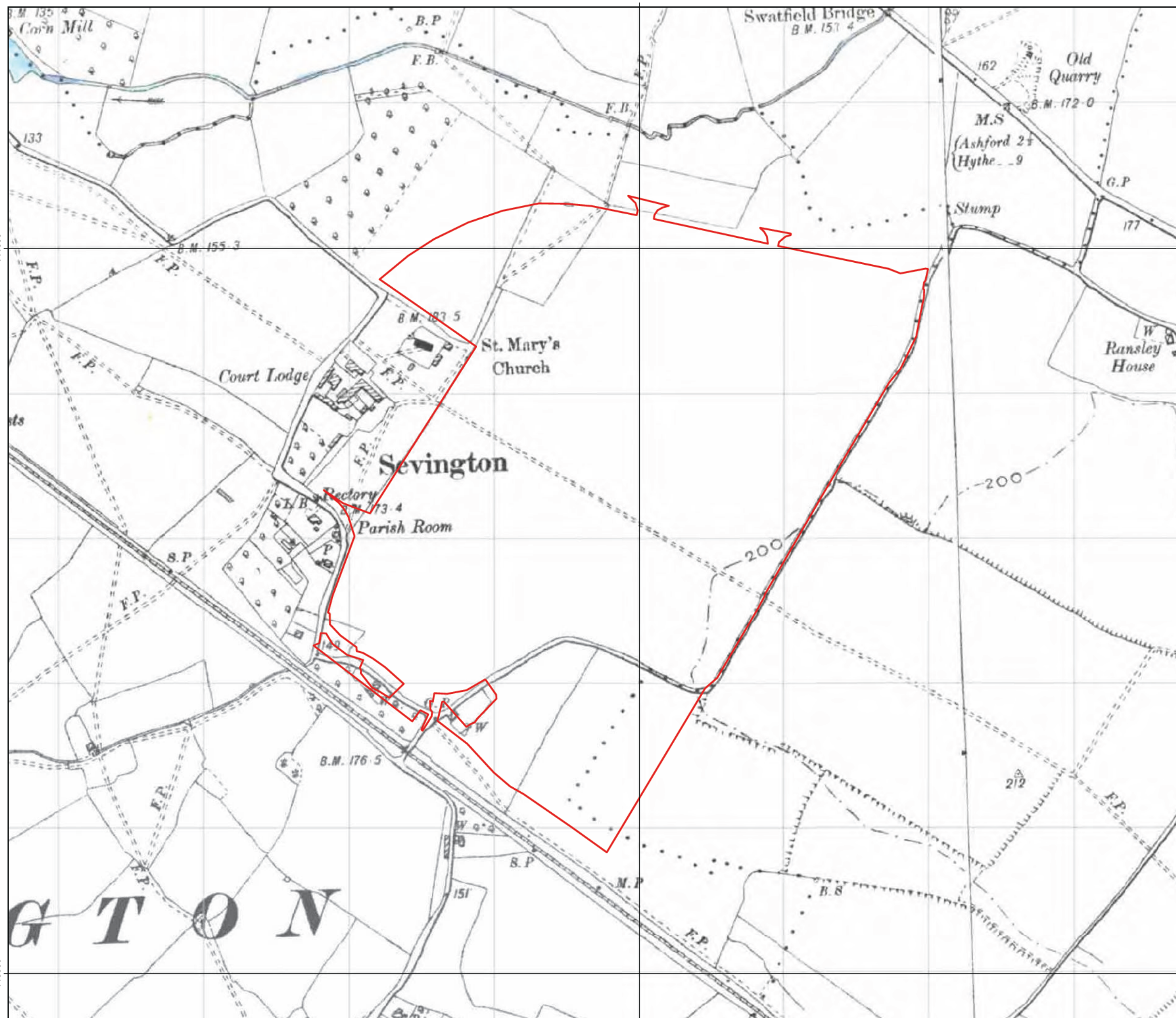
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Scale: 1:5000 @ A3



# Lanpro





# Heritage Statement: Sevington IBF, Ashford

Title:  
Figure 4. Extract of the Ordnance Survey 24" map of 1896

Legend:

Site

Base Map: © Crown copyright and database rights 2024. Ordnance Survey  
AC0000862729

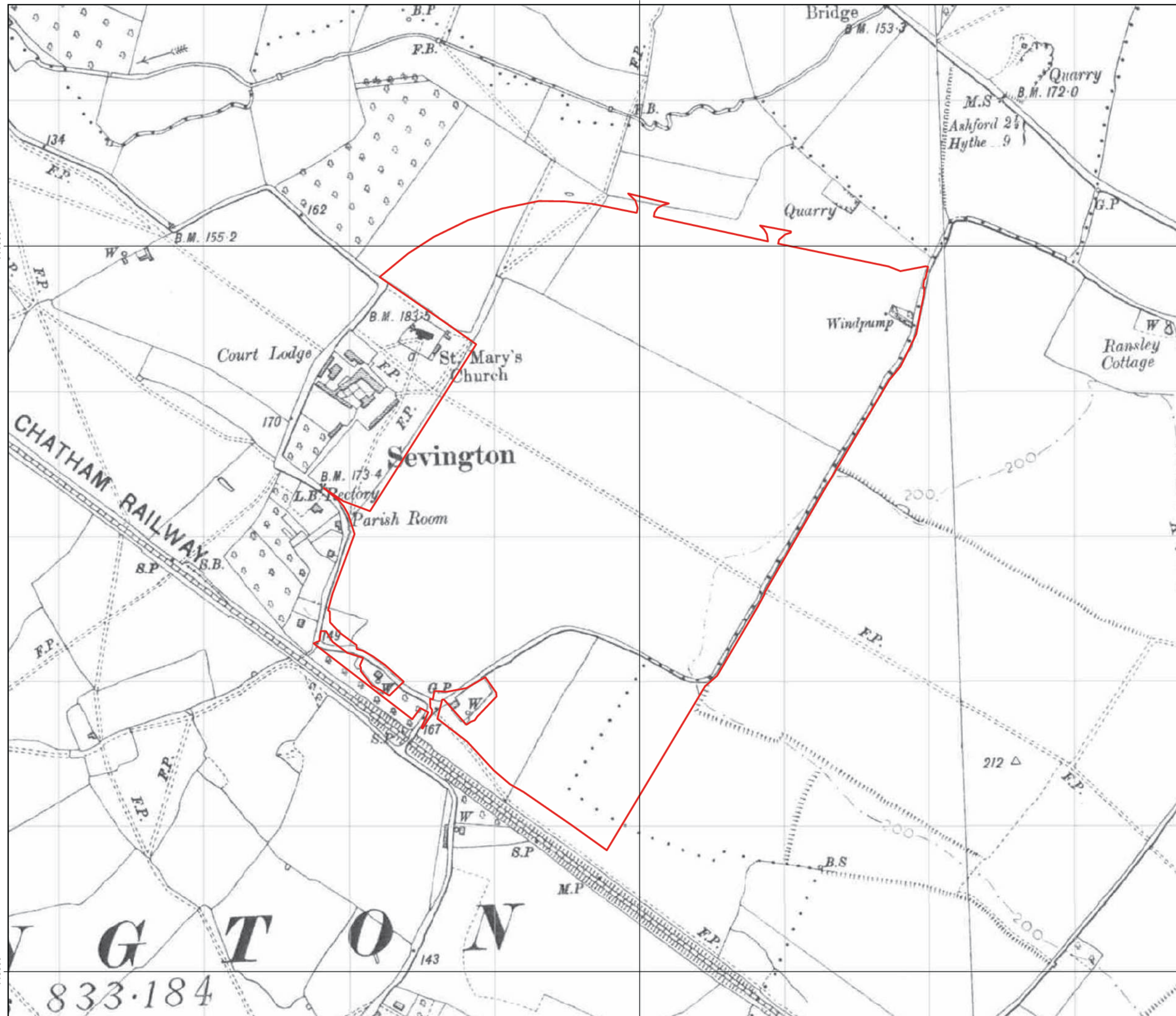
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## Heritage Statement: Sevington IBF, Ashford

Title:  
Figure 5. Extract of the Ordnance Survey 24" map of 1906

Legend:

Site

Base Map: © Crown copyright and database rights 2024. Ordnance Survey  
AC0000862729

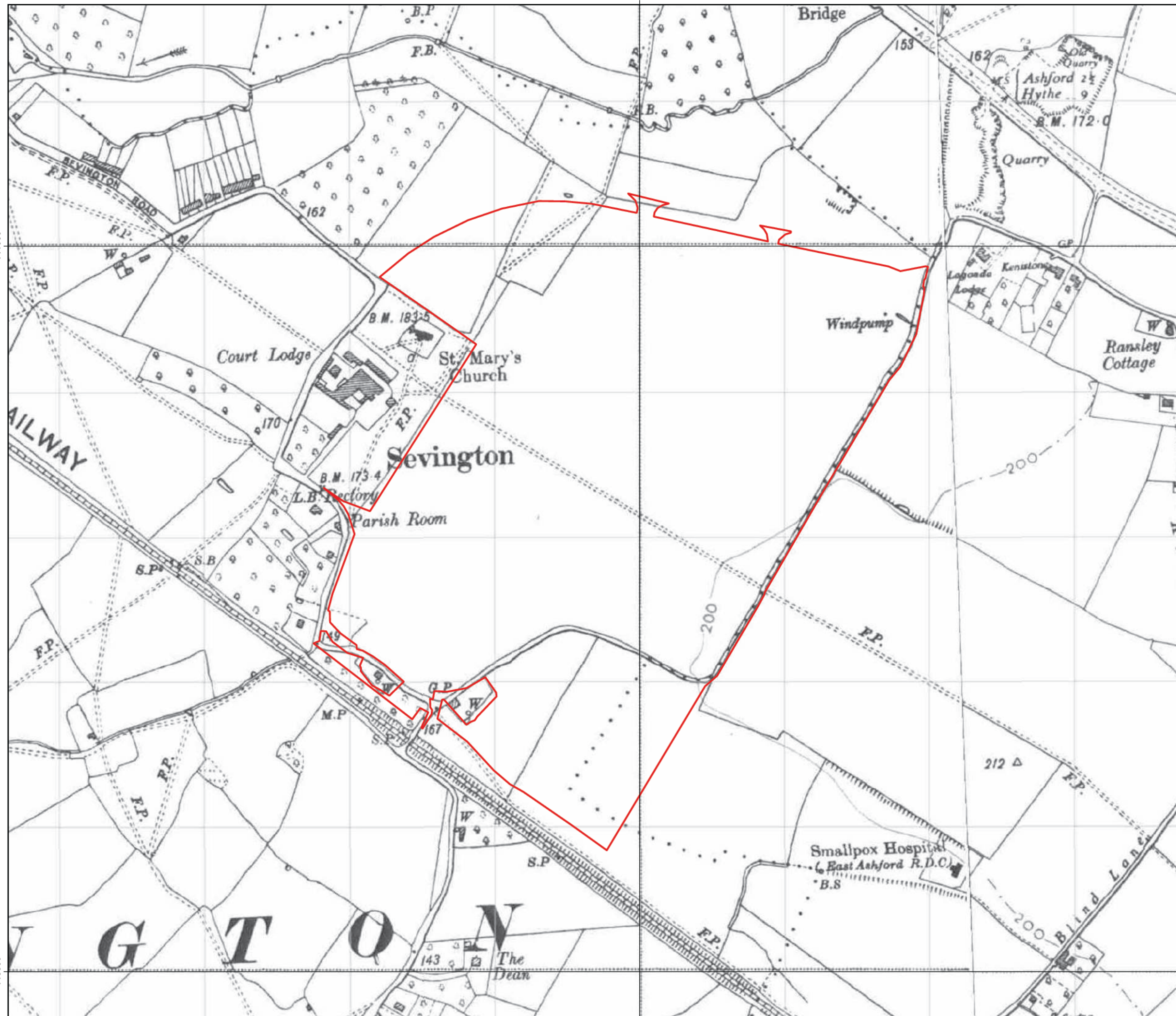
Co-ordinate system: OSGB36 / British National Grid

Scale: 1:5000 @ A3

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# Heritage Statement: Sevington IBF, Ashford

Title:  
Figure 6. Extract of the Ordnance Survey 24" map of 1938

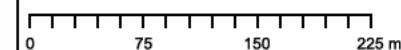
Legend:

Site

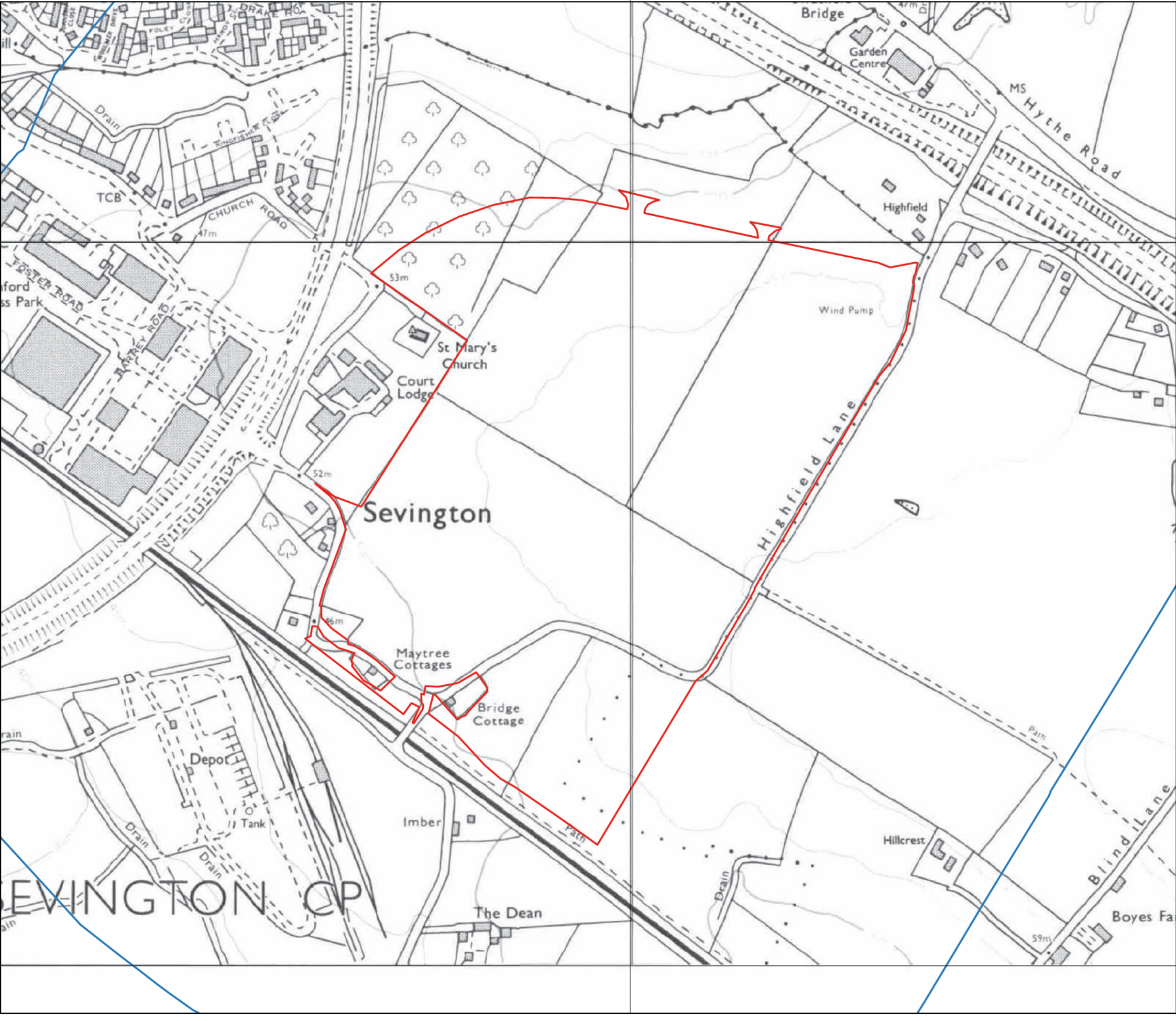
Base Map: © Crown copyright and database rights 2024. Ordnance Survey  
AC0000862729

Co-ordinate system: OSGB36 / British National Grid

Scale: 1:5000 @ A3







# Heritage Statement: Sevington IBF, Ashford

Title:  
Figure 7. Extract of the Ordnance Survey 1:10,000 map of 1988

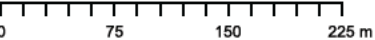
Legend:

 Site

Base Map: © Crown copyright and database rights 2024. Ordnance Survey AC0000862729

Co-ordinate system: OSGB36 / British National Grid

Scale: 1:5000 @ A3

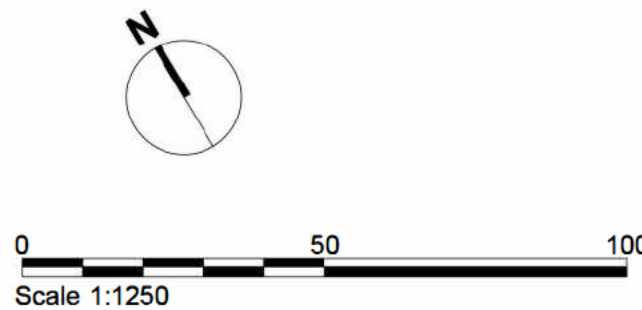


**Appendix 1            Development**



LEGEND

	APPLICATION BOUNDARY Boundary interfaces between future development Plots		PROPOSED SHRUB PLANTING Shrub and ground cover mix		FUTURE ROAD CONNECTIONS		PROPOSED OUTFALLS To engineers' details & specification
	EASEMENT TO EXISTING PIPELINE Easement of 9m required either side of the HP gas main		PROPOSED NATIVE SHRUB PLANTING		BLACKTOP TARMAC WITH CONCRETE KERB To main vehicular areas. To engineers' details & specification to meet adoptable standards.		LITTER BIN Refer to Hard Works Typologies 11107_PL_12_701
	AREA EXCLUDED FROM APPLICATION		AMENITY GRASS MIX Wear Tolerant Turf Grass Mix EG22 by Emorsgate Seeds sown at 25g/m2		BLACKTOP TARMAC WITH PIN KERB To edge to footpath adjacent to Estate Roads. To engineers' details & specification to meet adoptable standards.		DOG BIN Refer to Hard Works Typologies 11107_PL_12_701
	SOFT LANDSCAPE EXISTING TREES RETAINED Trees to be protected in accordance with BS 5837 (2012)		TUSsock GRASS MIX EG10 by Emorsgate Seeds sown at 5g/m2		PROPOSED CYCLEWAY		INTERPRETATION BOARDS 4no. located across the site. Refer to Hard Works Typologies 11107_PL_12_701
	PROPOSED LARGE SPECIMEN TREE		PROPOSED WILDFLOWER MEADOW Standard General purpose Meadow Mixture EM2 by Emorsgate Seeds sown at 4g/m2		DUSTED GRAVEL PATH 2m With timber edge to footpath within open space areas		BAT BOXES Approximate location of bat boxes to include a mix of Schwegler 2F, 2FDFP and IFF boxes
	PROPOSED SMALL SPECIMEN TREE		BULB PLANTING		TYPE 1 PATH 3m With concrete edge		BIRD NEST BOXES Approximate location of Schwegler 3SV bird nesting boxes
	PROPOSED MULTI-STEMMED TREE		PROPOSED LOW ORNAMENTAL SHRUB PLANTING Adjacent to internal roads		EXISTING PEDESTRIAN RIGHTS OF WAY/ FOOTPATH TO REMAIN		STARLING NESTING BOXES Approximate location of Schwegler starling nesting boxes
	PROPOSED EVERGREEN TREE		PROPOSED NATIVE SHRUB PLANTING ON POND BANKS		LAND RESERVED FOR FUTURE LINK ROAD		ROBIN BOXES Approximate location of Schwegler 2H robin boxes
	PROPOSED NATIVE HEDGE PLANTING		EXISTING HEDGEROW ALONG HIGHFIELD LAND To be retained and maintained where appropriate to the development. Gaps in hedge to be infilled appropriately (ecologist to advise)		PROPOSED TIMBER BOARDWALKS		OWL BOXES Approximate location of Schwegler owl boxes
	PROPOSED ORNAMENTAL HEDGE PLANTING		DRAINAGE FEATURES PROPOSED PERMANENTLY WET PONDS Refer to engineers' details and specification. To include Floating-Leaved Vegetation and Aquatics / Oxygenators		PROPOSED LANDFORM To engineers' details & specification		REPTILE HIBERNACULA
	PROPOSED EDIBLE HEDGE PLANTING Adjacent to the orchard		PROPOSED WETLAND PLANTING To include Emergent Species and Marginal Species (ecologist to advise at instillation)		TIMBER BENCHES Refer to Hard Works Typologies 11107_PL_12_701		INVERTEBRATE LOGPILES
	PROPOSED WOODLAND UNDERSTORY To be under planted with Ground Flora & Grass Mixture for Hedgerows and Woodland EG9 by Emorsgate Seeds sown at 5g/m2		PROPOSED WILDFLOWER POND EDGE MIX Wildflower Pond Edge mixture EP1 by Emorsgate Seeds sown at 4g/sqm		PROPOSED TIMBER BRIDGE		



Figured dimensions only are to be used. All dimensions to be checked onsite. Differences between drawings and between drawings and specification or bills of quantities to be reported to the PRC Group.

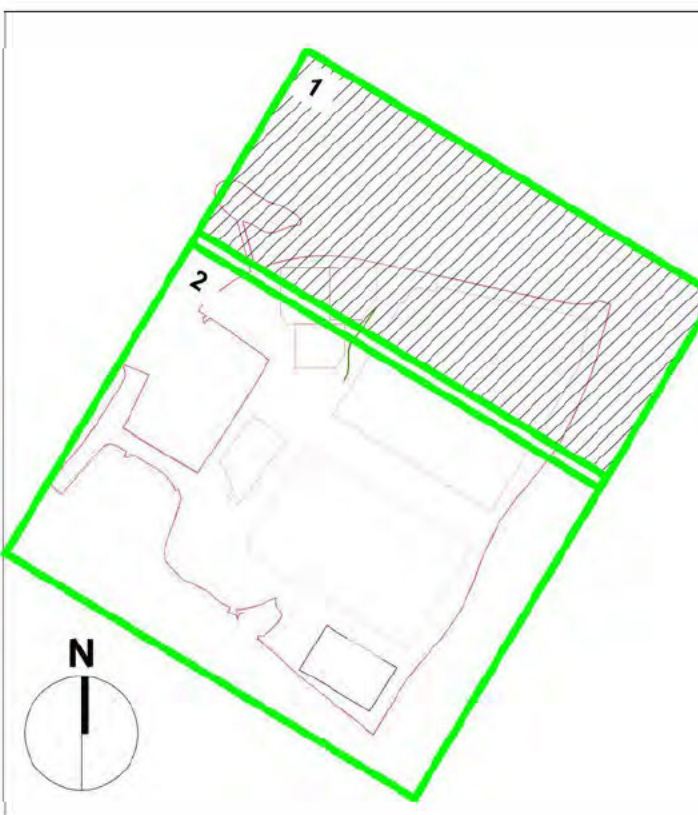
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Revisions: Drawn/Chkd: Date:

A. Planning Comments Incorporated EM Apr.'19  
B. Planning Comments Incorporated EM May 19  
C. KCC tarmacadam Comments incorporated AR June.'19

NOTES

1. FOR PROPOSED FINISHED LEVELS AND LAND CONTOUR FOR HARD LANDSCAPING PLEASE REFER TO ENGINEERS DRAWING REFERENCE 08-125 / 423
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEER'S DRAWINGS AND THE SPECIFICATION.
3. ALL WORKMANSHIP AND MATERIALS ARE TO COMPLY WITH THE SPECIFICATION, BUILDING REGULATIONS, RELEVANT BRITISH STANDARD AND MANUFACTURERS RECOMMENDATIONS.
4. THIS DRAWING IS NOT TO BE SCALED. ALL DIMENSIONS ARE IN MM UNLESS NOTED OTHERWISE.
5. SITE AND DISCREPANCIES REPORTED TO THE CONTRACT ADMINISTRATOR.
6. ECOLOGICAL ENHANCEMENTS LOCATIONS ARE APPROXIMATE AND WILL BE DETERMINED BY AN ECOLOGIST WHEN THE FEATURES ARE INSTALLED, AND THAT BAT AND BIRD BOXES SHOULD BE INSTALLED ON POSTS, OR ON SPECIMEN TREES AFTER FIVE YEARS OF GROWTH.



Location Plan NTS

Client:  
AVIVA LIFE AND PENSIONS UK LTD



Project:  
STOUR PARK WEST PHASE 1  
INFRASTRUCTURE WORKS  
RMA/PRE-START CONDITIONS

12 Warren Yard,  
Warren Park,  
Milton Keynes,  
MK12 5NW  
01908 305 246  
info@prc-group.com  
www.prc-group.com

Drawing Title:  
ILLUSTRATIVE LANDSCAPE  
MASTERPLAN COLOURED  
SHEET 1

Scale @ A1: 1/1250  
Checked by: AR  
Date: MAR.'19

Job No: 11107  
Stage: Drawing No: Rev: PL 12\_004 C

Issue Status:

Construction ☐ Preliminary ☐  
Information ☐ Approval ☒  
Tender ☐

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PRC Architecture & Planning

THE INFORMATION SHOWN  
INDICATIVELY SUBJECT  
TO SEPARATE  
APPLICATIONS

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

PLOT 7

PLOT 1

PLOT 6

For continuation refer to drawing 11107\_PL\_12\_005 General Arrangement - Sheet 2 of 2



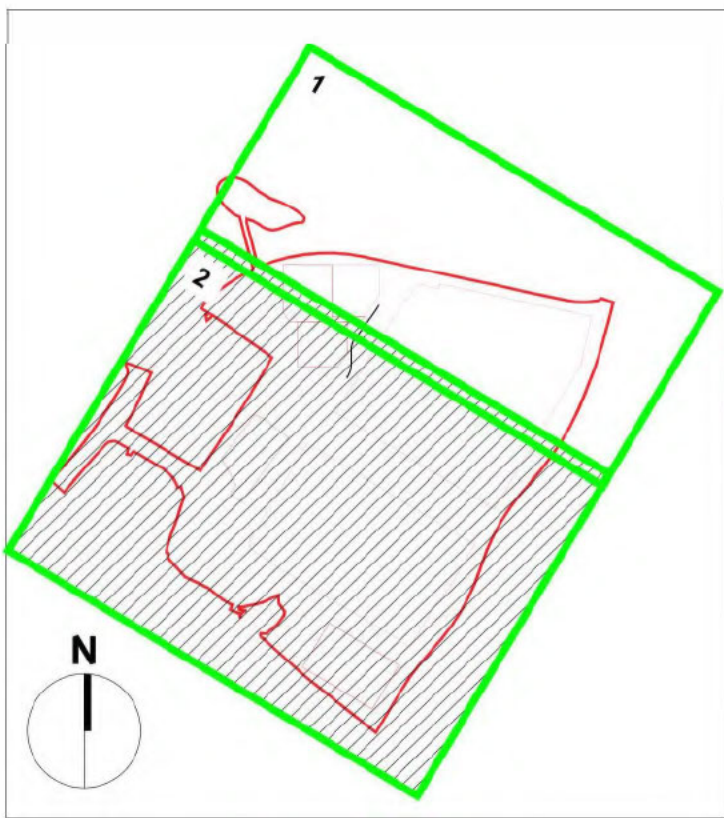
Figured dimensions only are to be used. All dimensions to be checked onsite. Differences between drawings and between drawings and specification or bills of quantities to be reported to the PRC Group.

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Revisions: Drawn/Chkd: Date:

A. Planning Comments Incorporated EM Apr.'19  
B. Planning Comments Incorporated EM May 19  
C. Church car park amended SA Jun 19

- NOTES**
1. FOR LEGEND PLEASE REFER TO DRAWING 11107\_PL\_12\_004
  2. FOR PROPOSED FINISHED LEVELS AND LAND CONTOUR FOR HARD LANDSCAPING PLEASE REFER TO ENGINEERS DRAWING REFERENCE 08-125 / 423
  3. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEER'S DRAWINGS AND THE SPECIFICATION.
  4. ALL WORKMANSHIP AND MATERIALS ARE TO COMPLY WITH THE SPECIFICATION, BUILDING REGULATIONS, RELEVANT BRITISH STANDARD AND MANUFACTURERS RECOMMENDATIONS.
  5. THIS DRAWING IS NOT TO BE SCALED. ALL DIMENSIONS ARE IN MM UNLESS NOTED OTHERWISE.
  6. SITE AND DISCREPANCIES REPORTED TO THE CONTRACT ADMINISTRATOR.
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Location Plan NTS

Client:  
AVIVA LIFE AND PENSIONS UK LTD



Project:  
STOUR PARK WEST PHASE 1  
INFRASTRUCTURE WORKS  
RMA/PRE-START CONDITIONS

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info@prc-group.com  
www.prc-group.com

Drawing Title:  
ILLUSTRATIVE LANDSCAPE  
MASTERPLAN COLOURED  
SHEET 2

**Architecture**  
Planning  
Master Planning  
Urban Design  
Interiors  
Landscape

Scale @ A1: 1/1250  
Checked by: AR  
Date: MAR.'19  
Job No: 11107  
Stage: PL 12 005  
Drawing No: C

Issue Status:  
Construction ☐ Preliminary ☐  
Information ☐ Approval ☒  
Tender ☐

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For continuation refer to drawing 11107\_PL\_12\_004 General Arrangement - Sheet 1 of 2

PLOT 5

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

PLOT 1

PLOT 4

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

PLOT 2

PLOT 3

DEVELOPMENT PLOTS  
SHOWN INDICATIVELY  
SUBJECT TO SEPARATE  
APPLICATIONS

CAR PARK WITH FENCING AND  
ACCESS TO CHURCH ( REFER  
TO PROPOSED CHURCH CAR  
PARK SITE LAYOUT  
REF.10601\_005 REV C)

THE INFORMATION SHOWN  
INDICATIVELY SUBJECT  
TO SEPARATE  
APPLICATIONS



0 50 100  
Scale 1:1250