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Rhodes Park

Heritage Statement

Iceni Projects Limited on behalf of
Quinn Estates .

February 2024

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ON BEHALF OF QUINN
ESTATES .

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Rhodes Park
HERITAGE STATEMENT

CONTENTS

1. INTRODUCTION 1

2. RELEVANT LEGISLATION, POLICY, AND GUIDANCE..... 6

3. HISTORIC DEVELOPMENT OF THE SITE AND SURROUNDINGS 13

4. SITE DESCRIPTION AND IDENTIFICATION OF ASSETS 21

5. ASSESSMENT OF IMPACT 30

6. CONCLUSION 35

APPENDICES

A1. APPENDIX NAME

1. INTRODUCTION

- 1.1 This Heritage Statement has been prepared on behalf of a Quinn Estates in support of application 23/1324/FH regarding Land at Rhodes Park (henceforth 'the Site'), It responds to comments received by Historic England (HE) 4th October 2023 (ref: P01565837).
- 1.2 In 2019 Quinn secured outline planning permission (Ref Y16/1122/SH) for a neighbourhood extension comprising up to 162 homes (including affordable, retirement and self-build homes together with B1 Business floor space and a range of high-quality outdoor spaces including allotments, recreational ground and multi-use games area, nature reserve and associated access, parking, amenity space and landscaping). There have been a number of reserved matters applications submitted, with the first phase of 54 dwellings approved and currently under construction. The current application is a full Planning Application for Phases 1b and 2 of the scheme, closely following the Outline Permission, but with some departures from the Outline. Importantly, however, these departures do not include any development beyond the original development envelope of the scheme; the Developable Areas and building heights of the Outline Permission are fully reflected by this application. HE's comments on regard the effects of the development on the 'wider funerary landscape', and the effects upon the significance of barrow mounds within the area through change within setting. These are sensitivities which relate to the *principle* of development within the site, a matter already considered when the site was allocated within the Sellindge Masterplan and further dealt with under the Outline Application.
- 1.3 The current application 23/1324/FH, to which HE have provided comments, proposes amendments to the outline scheme (Phase 1b and Phase 2). All changes will occur within the established development areas approved in the outline permission and changes relate only technical matters; The unit mix, number of dwellings, affordable housing provision, more self-build properties. The layout, delivery framework and developable area will not change. None of the differences between the proposed scheme and the outline are capable of having an effect on the conclusions of heritage impacts that would have been assessed at the outline stage, particularly in regard to the source of the concerns raised by HE.
- 1.4 HE was given the opportunity to comment specifically on the 'wider funerary landscape' during the consultation period for Otterpool Park, subsequent Core Strategy Review adopted in 2022, moreover during the outline stage of the current application. Any cumulative impacts arising from a consideration of proposals within the Rhodes Park

development with Otterpool Park were considerations for the determination of the latter application, given that outline consent had already been granted here in advance of the Otterpool Park Outline Permission. At this stage, nothing is proposed which fundamentally changes the consented baseline position in terms of permissions, and accordingly, no further impact on heritage assets can occur; HE's concerns as currently stated should have been a matter for earlier Consultations.

- 1.5 Historic England's comments on the wider funerary landscape are related to remains on the site of five ring barrows, (later overlaid with a field system and eroded by later modern agricultural use), and queries their relationship with assets of similar ages across a much larger areas. The barrows within the site were formerly unapparent as landscape features and are not recognised as Scheduled Monuments. The two largest and best preserved of these are being reinforced and incorporated into the emerging development and landscaping plan (approved as part of a reserved matters application, in relation to Condition 1 of the outline scheme- 21/0279/FH).
- 1.6 While we acknowledge the concerns of HE and KCC, and therefore provide the assessment requested on heritage setting, for the reasons stated above this should not effect upon the determination of the application, and should rather serve to give F&HDC officers and decision makers the confidence that the potential heritage effects have been fully considered.
- 1.7 The report therefore assesses the interrelationship between the recently discovered Barrow features within the site and other Barrows (designated as Scheduled Monuments) located at further distances within the surrounding Kent landscape - 'the wider funerary Landscape'; as identified in both the HE and Kent County Council (KCC) responses. It goes onto assess the effect of the proposals on the setting of these Scheduled Monuments, specifically addressing the recommendation that '*further work is needed to meet the requirements of paragraph 194 of the NPPF*' (Now Paragraph 200 updated Dec. 2023).
- 1.8 Designated Heritage Assets located within the near proximity of the site, including Little Rhodes and Rhodes Farm were assessed in the LVIA produced by GPC (November 2016) for the outline application (Ref Y16/1122/SH) this was informed by heritage scoping discussions with F&HDC prior to submission and has since been supplemented with an LVIA Addendum for the reserved matters application (2019). The assessment concluded a degree of less than substianial harm. Subsequent Reserved Matters applications relating to landscaping have included heritage benefits and mitigation measures to reduce this harm. The Scheduled Monuments included in this assessment

within Group A, were Scheduled in May 2021, hence their omission from previous reports.

1.9 Due to the nature of the burial mounds within the site, as Bronze Age constructions, the purposes of which remain the subject of academic interpretation, any attempt to specifically identify the original role these features play in the landscape and the interrelationship with other funerary monuments, would require speculation beyond the scope of this report and will inevitably remain inconclusive. This report has therefore identified those the assets in the closest proximity which are similarly indicative of the Bronze Age funerary landscape. This is considered both proportionate within the context of the previous heritage, landscape and archaeological assessments concerning the site, and entirely appropriate for judging the likely effects of the scheme on 'the wider funerary landscape' through the change to the setting of the scheduled monument groupings identified.

1.10 Specifically, this report will:

- Describe the site and identify relevant designated heritage assets;
- Set out the relevant legislative and policy framework within which to understand the potential effects on nearby heritage assets;
- Provide a proportionate and robust analysis of the Site and surrounding area's historic development and significance, drawing upon the previous research;
- Provide a detailed assessment of impact for the proposals on the setting of nearby designated heritage assets.

1.11 The existing Site and surrounding area were appraised during site visits to Sellindge in 2023 and those associated with other nearby sites with which Iceni Projects are also involved including nearby at Elm Tree Farm. A desk-based study was also undertaken including Ordnance Survey map regression and review of the previous heritage assessments, archaeological reports and Landscape assessments already conducted. As such we have a firm understanding of the constraints and sensitivities of the surrounding area.

1.12 The report is produced by Iceni Projects. Specifically, it is authored by Edward Wollaston, Senior Consultant – Built Heritage & Townscape and Laurie Handcock MA (Cantab) MSc IHBC, MCifA, Director – Built Heritage & Townscape.

Consultee Comments

Historic England Advice - Summary

The proposed development is located on agricultural fields at the foot of the Kent Downs. This rolling landscape, characterised by large scale field enclosures and pockets of woodland, is the setting of several designated heritage assets. The great time-depth of the area's occupation is also evident through the range of designated heritage assets. This includes scheduled monuments such as the various round barrow and Bronze Age cemetery sites which sit scattered throughout this wider funerary landscape. The positioning of barrows in a landscape and their visibility are highly nuanced and intimately connected to the surrounding landscape. This means assets which are some distance away from the development may nevertheless derive significance from the site.

Further erosion of the rural nature of this landscape may therefore cause harm to designated heritage assets beyond the immediate boundaries of the development site. However, the supporting assessment and visual information is not sufficiently robust to accurately identify the potential harm to heritage significance. This is because it does not include any setting assessment for designated heritage assets outside of the monument which may be affected by the proposals. There is also no mention of these assets is included within the Landscape & Visual Impact Assessment or the Addendum despite some designated sites being in close proximity to viewpoint locations. Given the very large allocated site to the immediate south of this proposal, we are also concerned about cumulative effects which may be created by the quantum of development in this area as a whole. We note that this site is not included in the local plan allocations.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We recommend that further work is needed to meet the requirements of paragraph 194 of the NPPF. Until this work is complete, Historic England is unable to fully assess this proposal. We also have concerns over the degradation of the historic landscape as a whole given the likely cumulative effects of overall development in this area.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Kent County Council - Summary

Although the Archaeological Desk-Based Assessment includes a commentary on the setting of nearby listed buildings, I cannot see any consideration of the wider historic environment and the setting of heritage assets. Given the discovery at this site of the remains of formerly significant prehistoric monuments (barrows), which clearly share intervisibility with areas of the surrounding landscape which contain scheduled prehistoric monuments (e.g. at Tolsford Hill), consideration should be given to the wider landscape and the potential impact of the proposed development, as has been requested by Historic England.

Response

- 1.13 The principle for development at the site has already been established with the outline permission and the landscape setting (cited in the HE advice as the component of significance which would be affected by the proposals) has been fully assessed within the LVIA (2016) and LVIA Addendum (2017). Nevertheless, this statement directly addresses the Historic England recommendation and provides a setting assessment for designated heritage assets noted in the response (assessed with Groups A and B), and commentary on the interplay between these assets and the barrows within the site, and the surrounding landscape setting. It has also considered the cumulative context of development and the effects upon historic landscape as a whole. Compliant with the policy set out in Paragraph 200 (Formerly 194) of the NPPF.

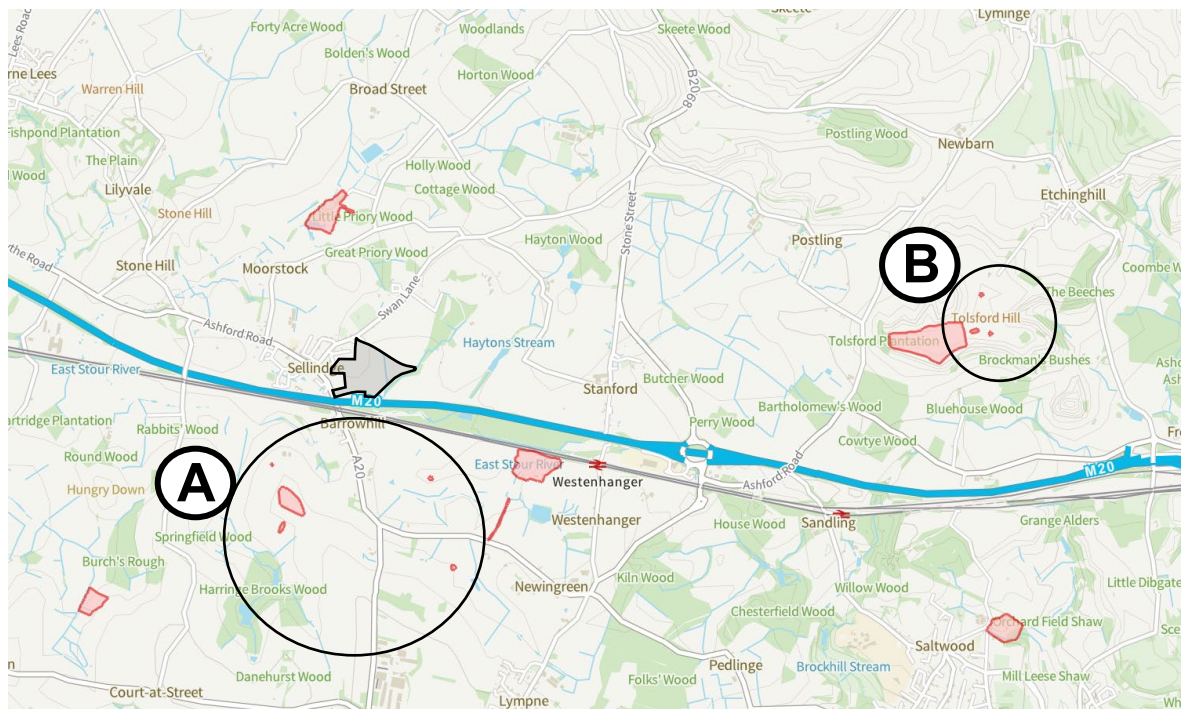


Figure 1 - Heritage Asset Mapping. The Site is Outlined in Black, Scheduled Monuments Identified In Red.

2. RELEVANT LEGISLATION, POLICY, AND GUIDANCE

Legislation

- 2.1 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- 2.2 Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

Local Development Plan

Policy Document	Relevant Policy	Summary
Folkestone & Hythe Places and Policies Local Plan (2020)	Policy HE1 Heritage Assets	<i>The Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their conservation and their significance, particularly where these bring at risk or under-used heritage assets back into use or improve public accessibility to the asset.</i>
Folkestone & Hythe District Heritage Strategy	Ensure that heritage plays a positive role in all areas of strategic planning – place shaping, economic, tourism, health and wellbeing, education; Enable and inform regeneration and growth, building places and communities with a stronger sense of place, pride and interest in their surroundings. Heritage-led regeneration and development provides additional economic value to an area, providing a quality environment that attracts new businesses; Contribute to and enhance tourism and the visitor experience and the economy;	

	Increase wider understanding of the District's heritage and the ways in which the community can engage with and experience their heritage; Provide strong social and health benefits through improving quality of life and activities that encourage physical and mental health and well-being, reduce social exclusion and crime; Provide a valuable educational resource that can contribute local context to curriculums at all stages and an available and accessible resource for local schools and colleges.
The Kent Design Guide SPD (2007)	It provides broad guidance around the designs for developments within Kent, providing advice on styles, forms and layouts. Landscape character is an important element, and the SPD encourages an awareness of creating an enjoyable and attractive sense of place, integrating the visual impact of the built environment with nature, reducing pollution, water and energy consumption, and creating noise and visual screening.
Sellindge Masterplan (2011) (produced by Urban Initiatives appointed by Shepway District Council and the Homes and Communities Agency).	The document covers the area including the site and has identified the sensitivity of the site through a Landscape Character Assessment.

National Policy

National Planning Policy Framework (Dec 2023)

- 2.3 The National Planning Policy Framework ("NPPF"), was most recently updated Dec 2023. The document maintains focus on sustainable development that was established as the core of the previous, 2012, NPPF.
- 2.4 This national policy framework encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach, which is reflected in the NPPF, as 'constructive conservation': defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment' (Constructive Conservation in Practice, Historic England, 2009).
- 2.5 Section 12, 'Achieving well-designed and beautiful places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 135, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 2.6 The guidance contained within Section 16, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it.
- 2.7 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).' Listed buildings and Conservation Areas are both designated heritage assets.
- 2.8 'Significance' is defined as 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'

- 2.9 The 'Setting of a heritage asset' is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'
- 2.10 Paragraph 198 requires local authorities to maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to assess the significance of heritage assets and the contribution they make to their environment.
- 2.11 Paragraph 200 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 190, local planning authorities are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.
- 2.12 Paragraph 203 emphasises that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 2.13 Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 2.14 Paragraph 206 states that 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.
- 2.15 Paragraphs 207 - 209 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable

weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 207). Whereas, Paragraph 208 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.

- 2.16 Paragraph 209 requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Practice Guidance ("PPG") (Department for Communities and Local Government, last updated July 2019)

- 2.17 The guidance on Conserving and enhancing the historic environment in the PPG supports the NPPF. Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.

- 2.18 Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic, defined as follows:

archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

- 2.19 The PPG emphasises in paragraph 007 the importance of assessing the nature, extent and importance of a heritage asset in understanding the potential impact and acceptability of development proposals.
- 2.20 Paragraph 018 explains that, where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 200-202) apply. It goes on to state that whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.
- 2.21 Harm may arise from works to the heritage asset or from development within its setting. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.22 The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy, including paragraphs 201 to 202 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF. Public benefits include heritage benefits, and do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Historic Environment Good Practice Advice in Planning

- 2.23 To support the national policies, Historic England have produced Good Practice Advice in Planning Notes (GPA's) relevant to this assessment is;

GPA 3: The Setting of Heritage Assets (2nd Edition) [December 2017]

- 2.24 This advice note focuses on the management of change within the setting of heritage assets. It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, (2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).
- 2.25 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues. .
- 2.26 The guidance in GPA3 gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets. It suggests that having due regard to the need for proportionality: This is particularly for developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account of the possibility that setting may change.
- 2.27 The guidance states this should be followed by an analysis to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.
- 2.28 The next stage is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

3. HISTORIC DEVELOPMENT OF THE SITE AND SURROUNDINGS

Sellindge

- 3.1 The area has a long period of settlement, while neolithic finds in the area have been recovered, there is greater evidence of settlement since Bronze Age. The barrows mounds which scatter the landscape broadly remain the only features present from this period indicative of the social, domestic, industrial and ceremonial history of the area.
- 3.2 The earliest mention of Sellindge as a rural settlement can be found in the Domesday book (1080), which records the Parish as having a population of 33 households with woodlands, ploughlands, and meadows. William I awarded the parish to Hugh de Montfort, a Norman nobleman, for his services to his campaign. The land passed through the de Montfort family until Hugh's heir Robert de Montfort was exiled during the reign of Henry I. The manor of Sellindge was thus presented to the King as an escheat.
- 3.3 The development of Sellindge was sporadic for much of its history, comprising of diffused houses within a rural agrarian setting. This is illustrated in the 1769 map of the area, which shows a number of small communities with variations of the Sellindge name.
- 3.4 The modern-day village developed at the crossroads of Ashford Road and Swan Lane at Sellindge Lees, but was, up until the 20th Century, comprised of only a small handful of houses. The former road connected the settlement to the village of Ashford to the west, which itself had developed along the old Roman road from Canterbury in the northeast. Thereby developing as a linear settlement along this key route to London. The settlement served as one of a number of stopping point for coaches on the route towards London. The 1818 Map shows the former road layout which was replaced by the construction of a new turnpike road which broadly follows the same route as the present. The historic Sellindge village was actually located to the west of Sellindge Lees around the church of St Mary, where the junction of Ashford Road and Stone Hill are located. The main activity of the area was farming, as indicated by historic maps which show a number of farms scattered throughout both Sellindge and Sellindge Lees. A nearby mill at Hodiford evidences the agricultural industry here, although it is possible that grain and corn were also transported to Ashford, where there were a number of mills. A Tanyard Farm is also shown on the 1870s map, with a nearby tannery from which it likely derived its name, suggesting there was some modest industrial activity in the area too.

- 3.5 Although there is sporadic development of residential development upto 20th Century,- Sellindge underwent significant intensification of development from the mid 20th Century, with the name Sellindge shifting to the historic area of Sellindge Lees. This area grew as a result of the M20 constructed in 1960, which provided rapid access to London. The presence of the M20 shifted the general role of the village whereby it no longer appeared on the main roadway through the area from Ashford.
- 3.6 As a result now a distinctly modern suburban character emerges during the 1960s and 1970s. Later 20th century development is largely limited to new infill housing along Swan Lane to the northeast and Moorstock Lane to the north. An OS map progression of the Site and surrounding area can be seen in Figures 2 to 6. It identifies the relatively recent evolution of its rural character towards an increasingly modern suburban space.

Barrows

- 3.7 Barrows largely date from the Middle Neolithic to the Middle Bronze Age. Bowl barrows begin to appear from before 3000 BC but the majority belong to the period 2400-1500 BC. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials, and exhibit regional variations in form and a diversity of burial practices. They occur either in isolation or grouped as cemeteries, and often acted as a focus for burials in later periods. Most round barrows from this period are bowl barrows. Bell, disc and pond barrows are considerably rarer.
- 3.8 *Few barrows survive in an undamaged state. Far greater numbers have been partly or completely levelled by over two thousand years of agriculture and now appear merely as shallow swellings on the ground surface, or are visible from the air as soil or vegetation marks that indicate the position of buried ditches or spread mounds. Almost every parish contains at least one and often more.*
- 3.9 *While barrows are often isolated, many occur in groups, sometimes of just two or three, but occasionally of up to thirty or more. These are called barrow cemeteries and typically consist of barrows in a variety of forms that have accumulated over many generations. In such cases the land between and around the barrows is important as it may contain evidence of paraphernalia associated with the functioning of the monument such as avenues, burials, pyres and feasting areas. Some barrow groups cluster together in small areas, while others take on a looser arrangement with groups of two or three spaced at much greater intervals. In some instances groups take on a linear form. Groups of barrows are sometimes found in association with other monuments that are also often assumed to have served a ceremonial or ritual purpose during the Neolithic and Bronze Age. These include avenues, cursuses, henges, mortuary enclosures,*

stone and timber circles. Such relationships are little understood but the variety of spatial and chronological associations provide invaluable areas for archaeological study, for example, allowing greater precision in the dating of these monuments.

- 3.10 Recently the barrows nearby in Group A have been subject to aerial photography and LiDAR imagery. Geophysical survey (2017), Trial trenching (2018). Those located to the South in Group A these all identified that the barrows are 'unlikely to be earlier in date than the early Bronze Age'. Those at Tolsford Hill in Group B are identified as dating from the Bronze Age.

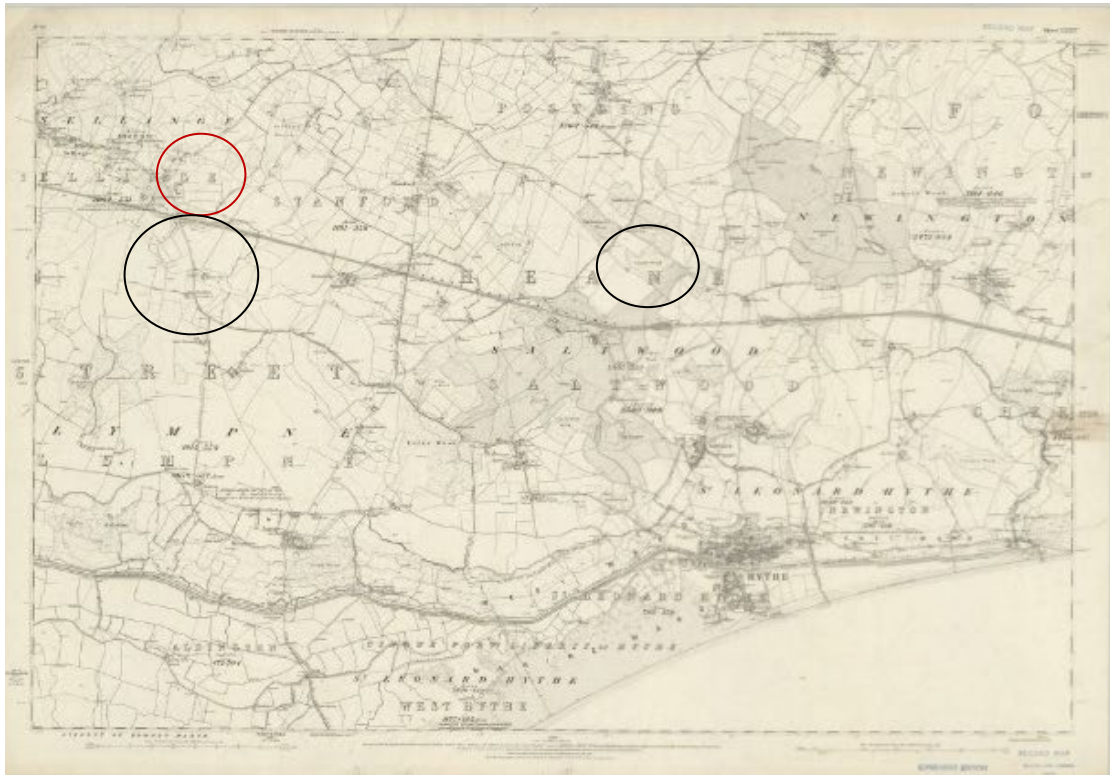


Figure 2 – OS Map 1872

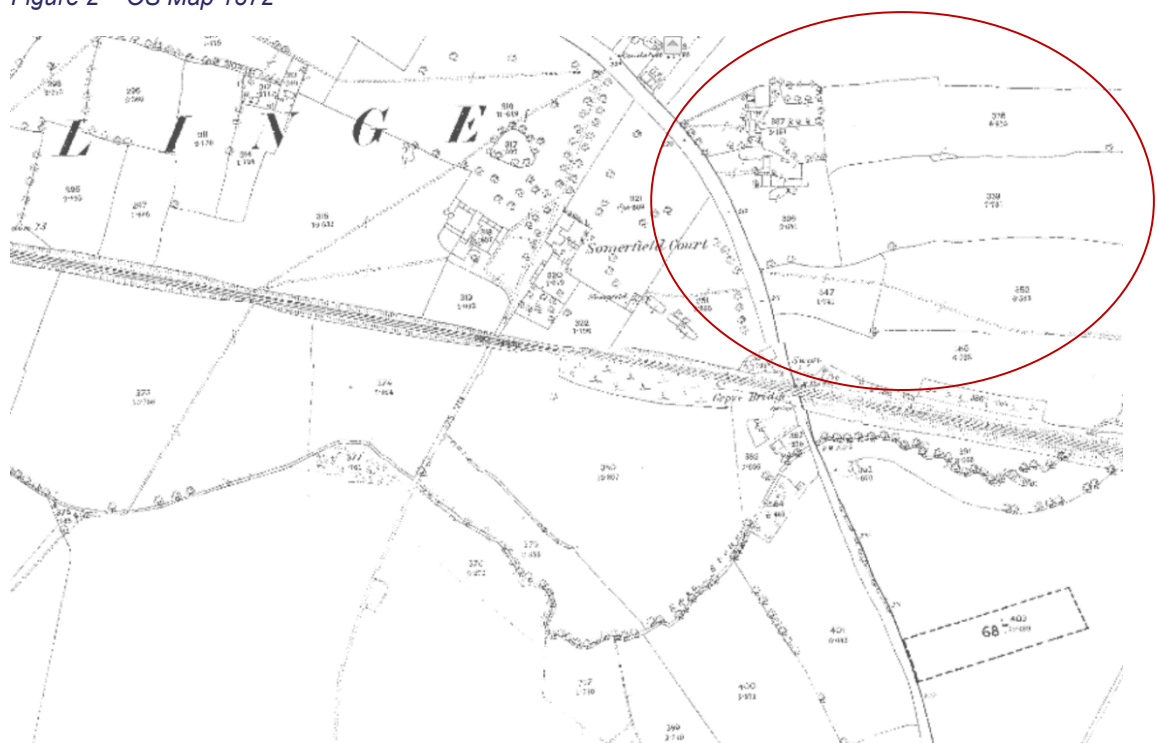


Figure 3 – OS Map extract 1872

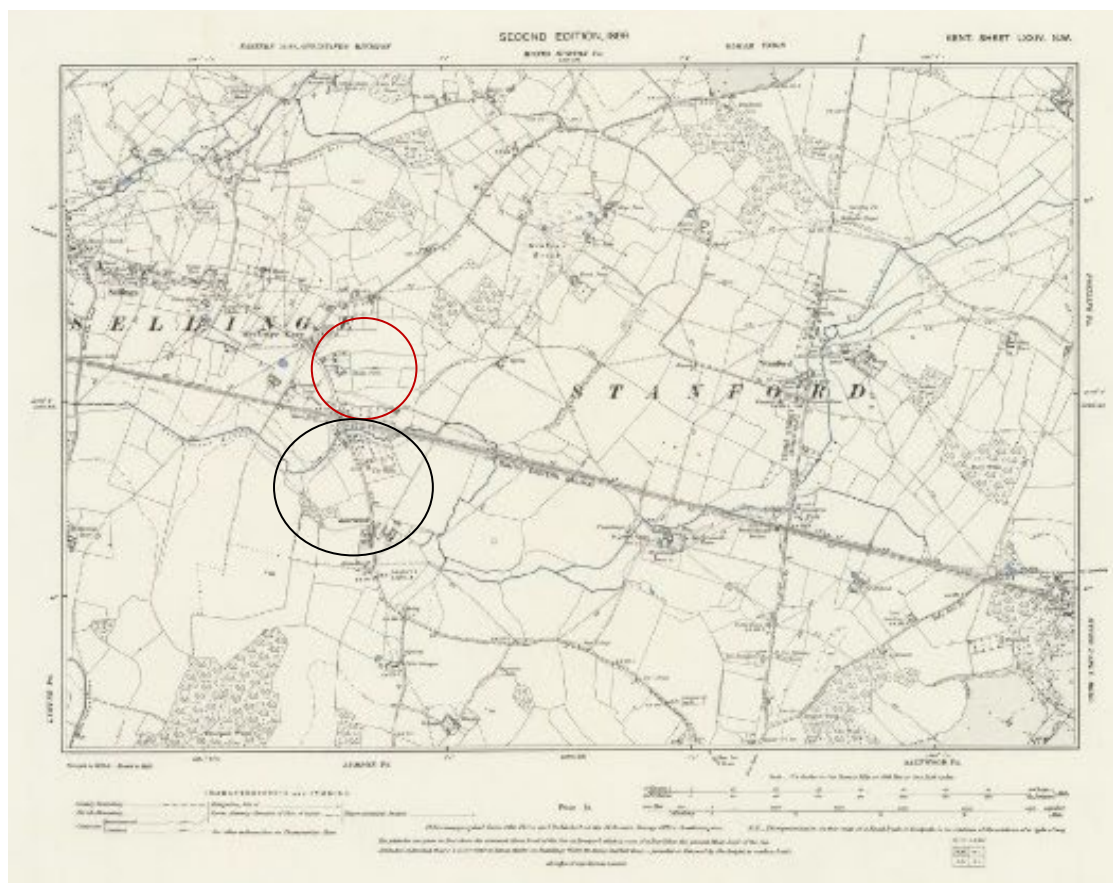


Figure 4 – OS Map 1897



Figure 5 - OS Map Extract 1897

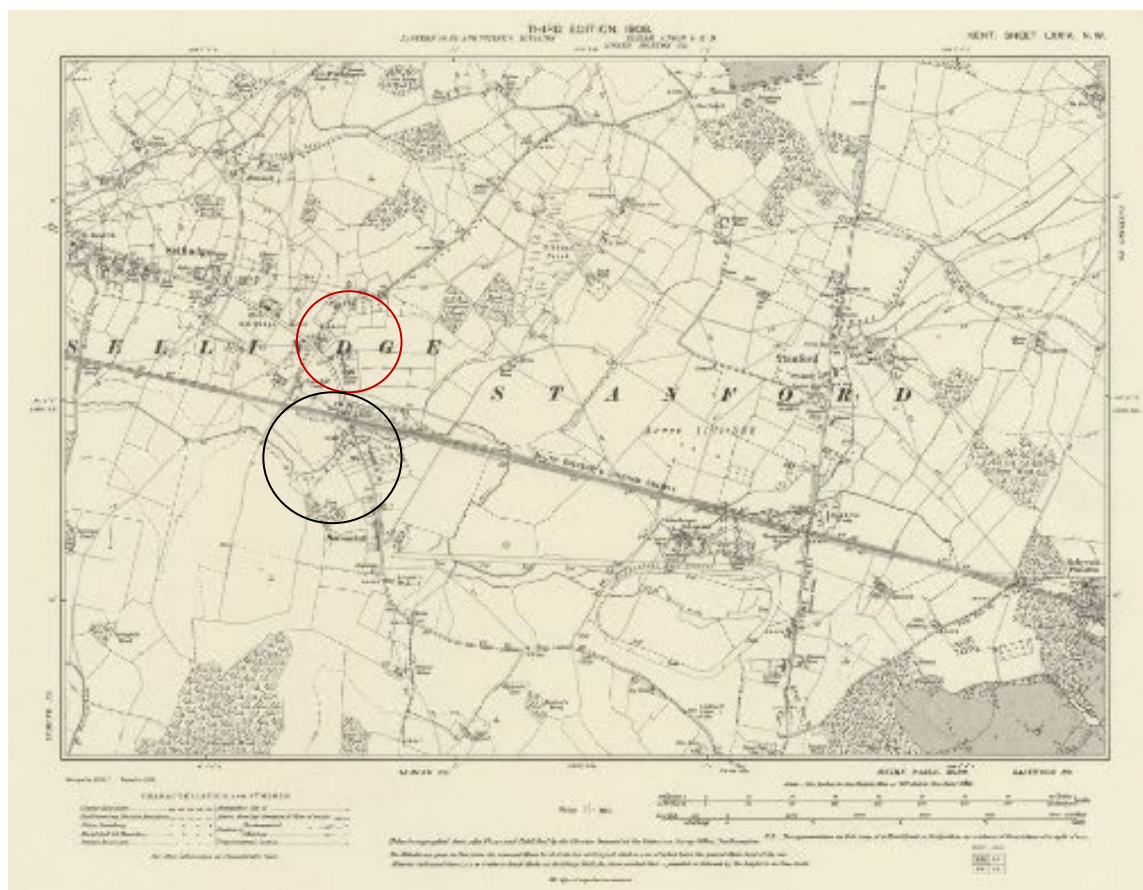


Figure 6 – OS Map 1906

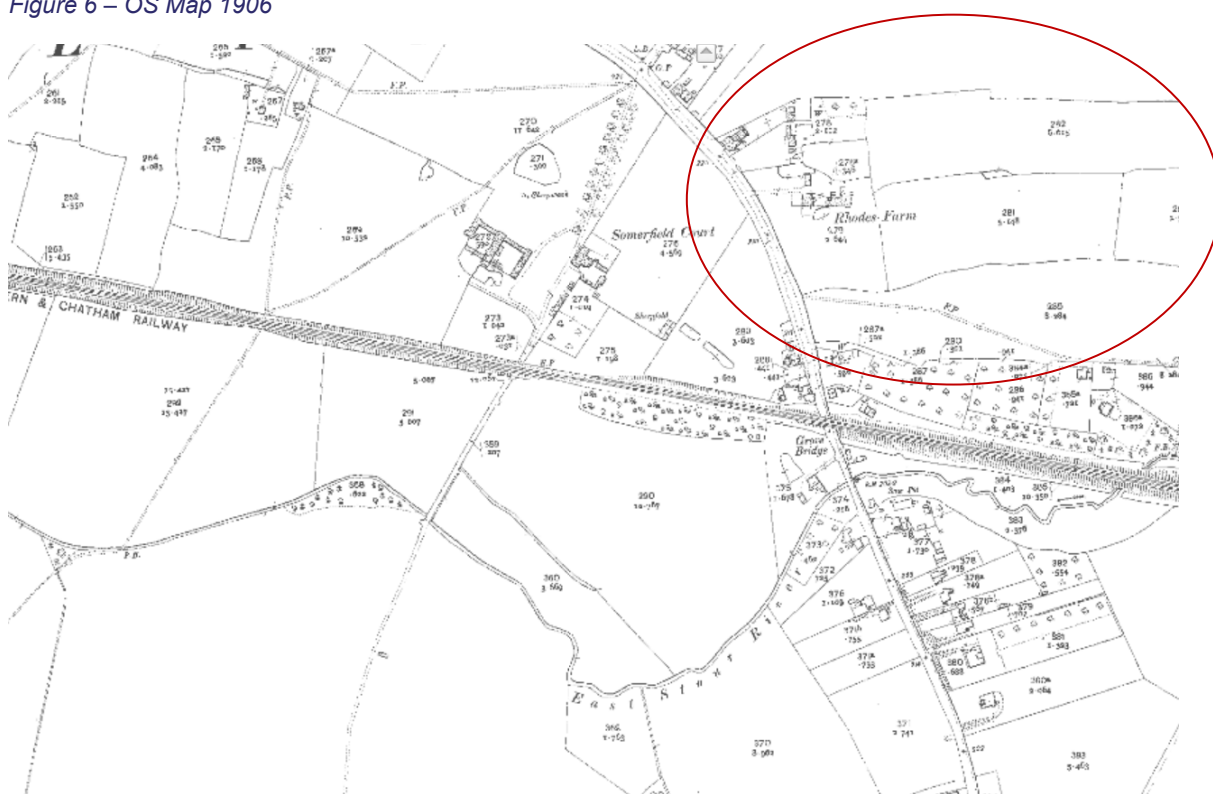


Figure 7 OS Map Extract 1906

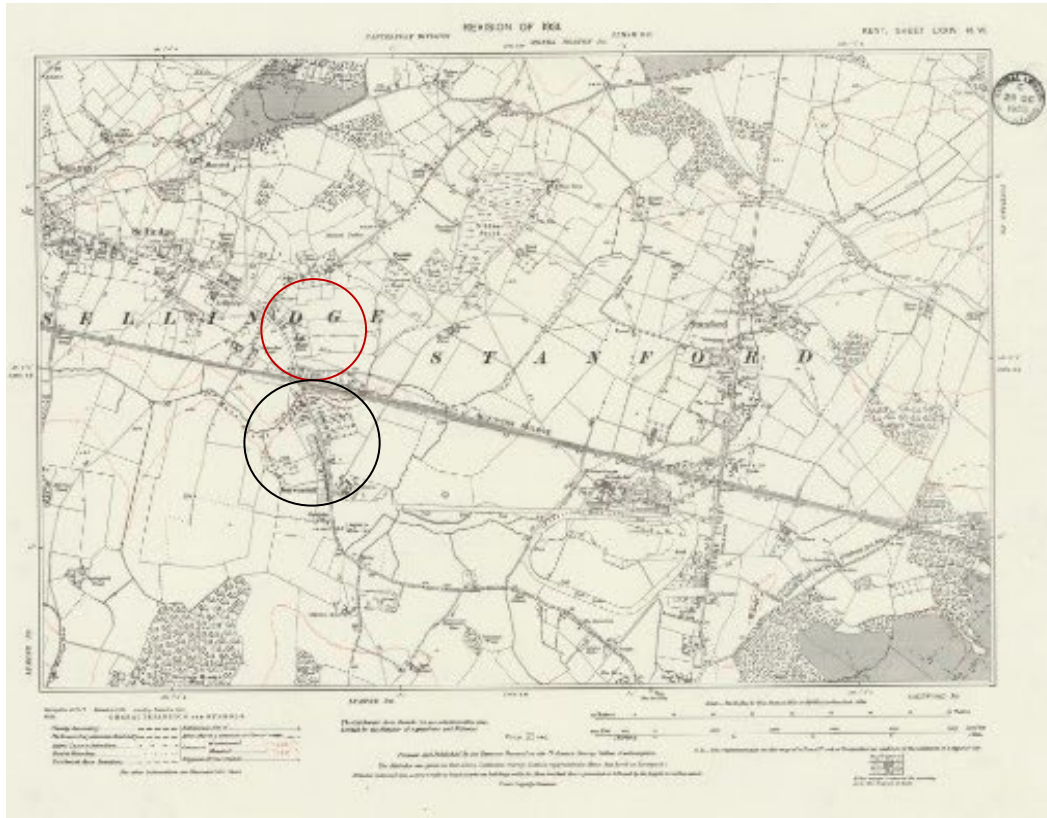


Figure 8 – OS Map 1938

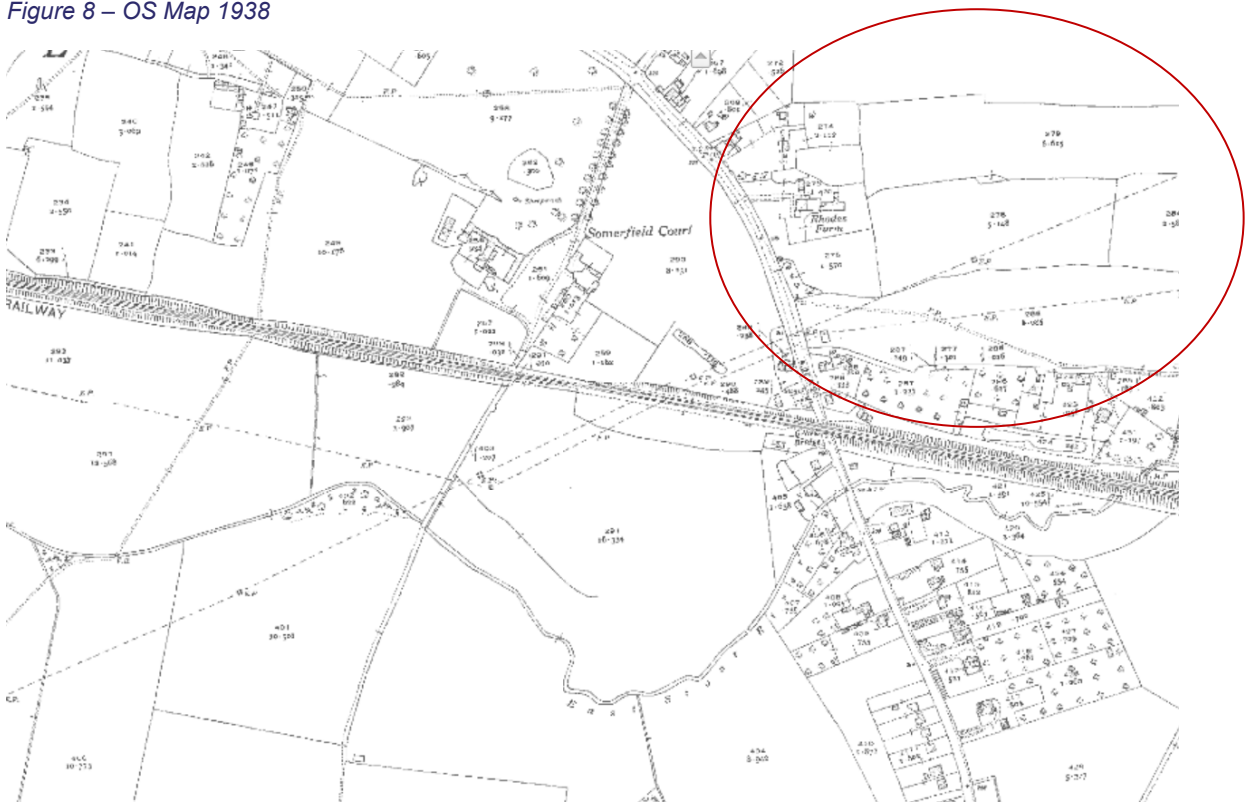


Figure 9 – OS Map Extract 1929

4. SITE DESCRIPTION AND IDENTIFICATION OF ASSETS

Site Description

- 4.1 Quinn Estates are developing a high-quality community extension on the former agricultural land at Grove Park. In 2019 Quinn secured outline planning permission for a neighbourhood extension comprising up to 162 homes including affordable, retirement and self-build homes together with Class B1 Business floor space, and of high-quality outdoor spaces including allotments, recreational ground and multi-use games area, nature reserve and associated access, parking, amenity space and landscaping. There have been a number of reserved matters applications submitted, with the first phase of 54 dwellings approved and currently under construction. The current proposals seek changes to the technical matters of Phases 1b and 2. This is predominantly related to the unit mix whereby the number of detached units is reduced and there is an increase in the numbers of semi detached and terraced units. All changes would occur within the established development areas and general layout would remain unchanged.
- 4.2 Archaeological Investigations associated with the 2019 outline consent have revealed 'Area 4' of the site west of the spine road contains five rings barrows of which one contains *Mid to Late Bronze Age inverted bucket cremation urns deposited in pit that was presumably left open*. The entire area was then overlain by a historic field system and subject to further erosion by agricultural use. Archaeological investigation in Area 4 has been completed and area designated for 20 houses has been signed-off by KCC for development. An area to the west containing two ring barrows has been designated for preservation in-situ, under recently recreated mounds which will become a permanent feature of the landscaping plan.
- 4.3 It is important to note that while commonly acknowledged as burials the purpose and importance of Barrows generally remains a matter of interpretation and debate. Not all barrows on the site contained evidence of burials and when considered comparatively with other sites within Kent E.g at Ringwould. May have had an alternative cultural significance, such as territorial markers. It remains necessary to temper the assessment on their role within the landscape with the above, acknowledging that information on their significance, role within the wider landscape and relationship with other barrow mounds may be subject to change and will inevitably remain incomplete and speculative.
- 4.4 The Archaeological report produced for the 2019 consent is clear that these mounds have not been a landscape feature since the Iron Age when they were overlaid with a

field system, which has since been subject to consistent agricultural use up to the present.

Scope of Assessment

- 4.5 The scope of this report is defined by the advice received from KCC and HE which specifically sought additional information on the effect of the development on the relationship between the Barrows present on the site and the setting of the Scheduled Monuments within the wider funerary landscape. Although not mentioned explicitly in the HE advice, the closest Barrows located nearby to the site are *Barrow cemetery to the south-west of Barrowhill (Scheduled Monument, List Entry Number: 1475132)*, *Bell barrow approximately 750m to the south-west of Westenhanger Castle, also known as barrow 44 (Scheduled Monument, List Entry Number: 1475133)*, *Round barrow approximately 400m north-east of Upper Otterpool Farmhouse, also known as barrow 136 (Scheduled Monument, List Entry Number: 1475688)*. Located at distances of over 1km from the boundary of the site and beyond the railway line and M20. These are assessed as Group A
- 4.6 The KCC response gives an example of barrows at Tolsford Hill when providing advice which references the advice from HE. The assets cited include; *Bowl Barrow 225m S of Tolsford Hill telecommunications mast (Scheduled Monument, List Entry Number: 1012269)* *Two bowl barrows 700m east of Tolsford Plantation on Tolsford Hill (Scheduled Monument, List Entry Number: 1012271)* *Bowl barrow 250m west of Brockman's Bushes plantation on Tolsford Hill (Scheduled Monument, List Entry Number: 1012275)* These are located at distances of over 5km away and assessed as Group B.
- 4.7 The assessment acknowledges that when considering the position of barrows of within the landscape, it is often the case of barrows with an interconnected purpose or ritual significance may be located over large distances, signifying a relationship which may be territorial, celestial or along a key route. The monuments within Groups A and B have been carried forward for assessment, as the closest to the site boundary and are considered both proportionate, to the development and sufficient to understand the landscape context of the barrows within site, and how they contribute to a wider legibility of the Bronze Age funerary landscape.
- 4.8 The effects upon nearby heritage assets including listed buildings; *Rhodes House (Grade II, List Entry Number: 1344203)* *Little Rhodes (Grade II, List Entry Number: 1054031)*, *Stream Cottage And Grove Bridge Cottage (Grade: II, List Entry Number: 1054727)*, *Barn Complex About 66 Metres West of Somerfield Court (Grade: II, List*

Entry Number: 1344201) Railway Cottages (Grade: II List Entry Number: 1061097) Somerfield Court (Grade: II, List Entry Number: 1068786) were assessed as part of the approved outline application within a Heritage Statement produced by GPC (2017). This concluded 'less than substantial harm' To Rhodes House and Little Rhodes. A number of further mitigation strategies have since been added to the scheme as it has developed refined through the reserved matters application, this has been reduced the potential for harmful effects. The effects would remain less than substantial harm.

- 4.9 The following section considers the significance of the above assets and provides an assessment on the potential effects on the development, with consideration on the cumulative schemes occurring nearby. This is predominantly focussed on the 'funerary landscape' and how this component of their special interest is articulated and effected by the proposals. The assessment of individual assets has closely followed the checklist set out in GPA 3 to arrive at the conclusions and has been further informed by a visit to the site and the surrounding area.

Group A

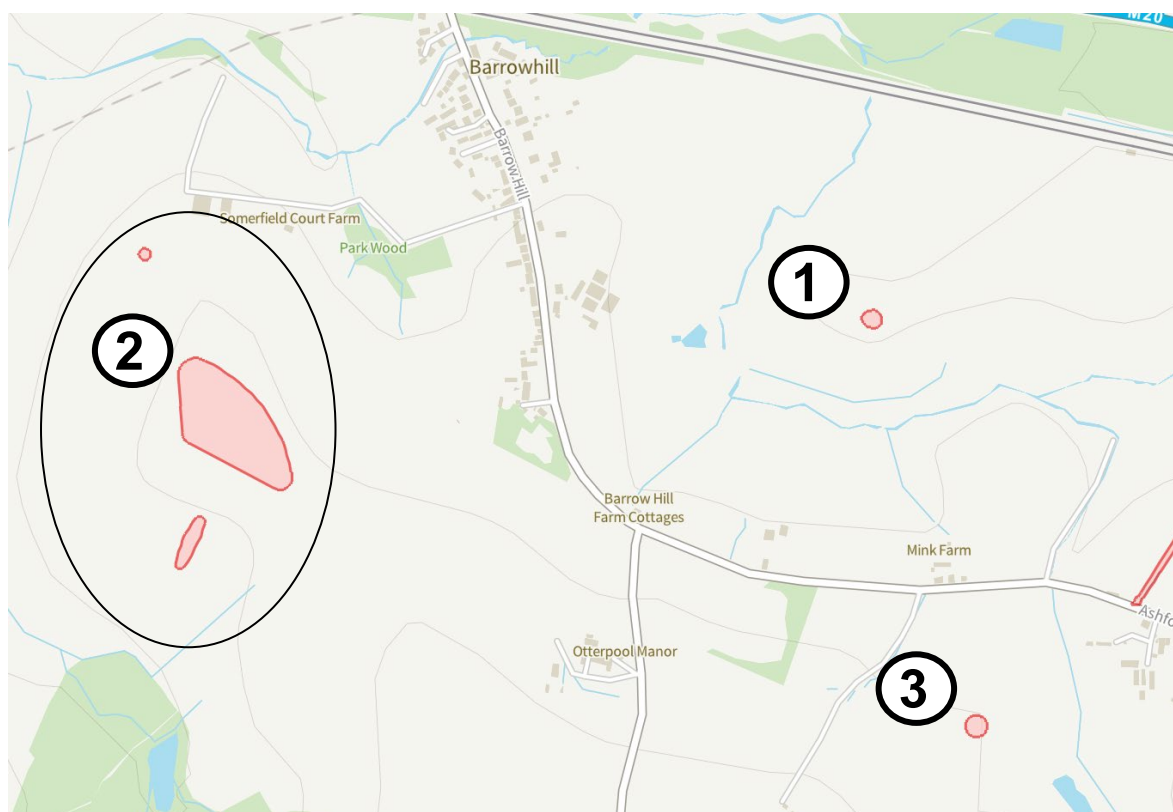


Figure 11 – HE Map Group A

- 4.10 Group A is composed of; (1) Bell barrow approximately 750m to the south-west of Westenhangar Castle, also known as barrow 44 (Scheduled Monument, List Entry

Number: 1475133) (2) Barrow cemetery to the south-west of Barrowhill (Scheduled Monument, List Entry Number: 1475132) (3) Round barrow approximately 400m north-east of Upper Otterpool Farmhouse, also known as barrow 136 (Scheduled Monument, List Entry Number: 1475688)

- 4.11 The group is located to the south of the application site at distances between 500m and 1km beyond the M20. It sits in an open field to the south of Somerfield Court Farm. These assets were first Scheduled in 2021.

Significance

- 4.12 The monuments in Group Value A are all collectively identified in their respective listing descriptions as having a group value. Their significance is predominantly derived from their historic and archaeological interest, as rarely surviving buried funerary earth work features. They retain evidence of their methods of construction and evidence the attitudes and practices of Bronze Age funerary rites. Their listing descriptions note in general terms their reasons for their designation, summarised as; Survival - a group of barrows with above-ground and buried remains, Rarity – relatively rare forms of barrow including a bell form, Diversity - Representing a range of approaches to Bronze Age funerary practices, evident through the inherent differences between the structures from the same period, Documentation – The barrows are recently excavated and designated assets which has added to the understanding of their significance. Potential – further potential for buried remains and understanding of the interrelationship with other local funerary monuments, Group Value – with the other monuments as noted as part of Group A.

Setting

- 4.13 The immediate setting of the monuments is constrained by the M20 and railway line to the north. The fields in which the monuments sit are relatively open, although surrounded by fragmented hedgerows. Resultantly, there is low intervisibility with the wider landscape and no direct views between the assets which are divided by Barrow Hill. Views are disrupted by a number of elements including the conflation of linear development along Barrow Hill (A20), existing mature hedgerows for garden and field boundaries, moreover the presence of the M20 remains dominant. It also entirely prevents any possible views between these barrows and the land within the application site.
- 4.14 Due to distance and the extent of development fronting the road on Barrow Hill, direct views into the fields which contain these assets are not possible. The monuments are best experienced in areas to the south of the M20, within their fields and when looking

south from the railway, and across the open field in which they site, where views of the asset are less interrupted by the busy M20.

- 4.15 Clearly, the setting of this monument has been subject to significance change since it was first constructed. The large scale agriculturalization of the surrounding area and later 19th-20th century infrastructure has eroded the landscaped setting of these assets which has reduced the sensitivity of the setting to further change. It is important to note that due to this, the experience of reaching these monuments is one where the visitor has to travel past existing modern development to reach fields which contain the monument. When arriving at the monuments their relative isolation is affirmed by the open field but they cannot be appreciated without the context of modern development when approaching them. When in their near setting, there is no clear visual relationship with any other monuments within the wider landscape.

Contribution of Setting to Significance

- 4.16 The presence of Barrows within the site boundary means that the site forms part of the wider Bronze Age Funerary Landscape and therefore contributes to the significance of these monuments. The arrangement and layout of multiple burial structures within the landscape provides insight into Bronze Age social structures, religious beliefs, and burial practices. Because the landscape holds monuments from a range of different time periods, the monuments contribute to an understanding of the evolution of burial practices over time. The positioning and alignment of a barrow within the funerary landscape can hold symbolic significance, as either aligned with celestial events, other burial structures, or important geographical features, including proximity to water sources, natural landmarks, or strategic positions, (such as Tolsford Hill) and provides insight into about the society's relationship and the importance attached to specific geographical features and the wider landscape.
- 4.17 There is no intervisibility between the site and these assets, the setting having been heavily disrupted by the presence of the M20, which has impacted upon the ability to appreciate any historical landscape connection between these clusters of barrows. This is further reduced by the sites inherent low visibility in the landscape more generally; as a result of local topography, mature hedgerows, and the layout and orientation of surrounding built form.

Group B

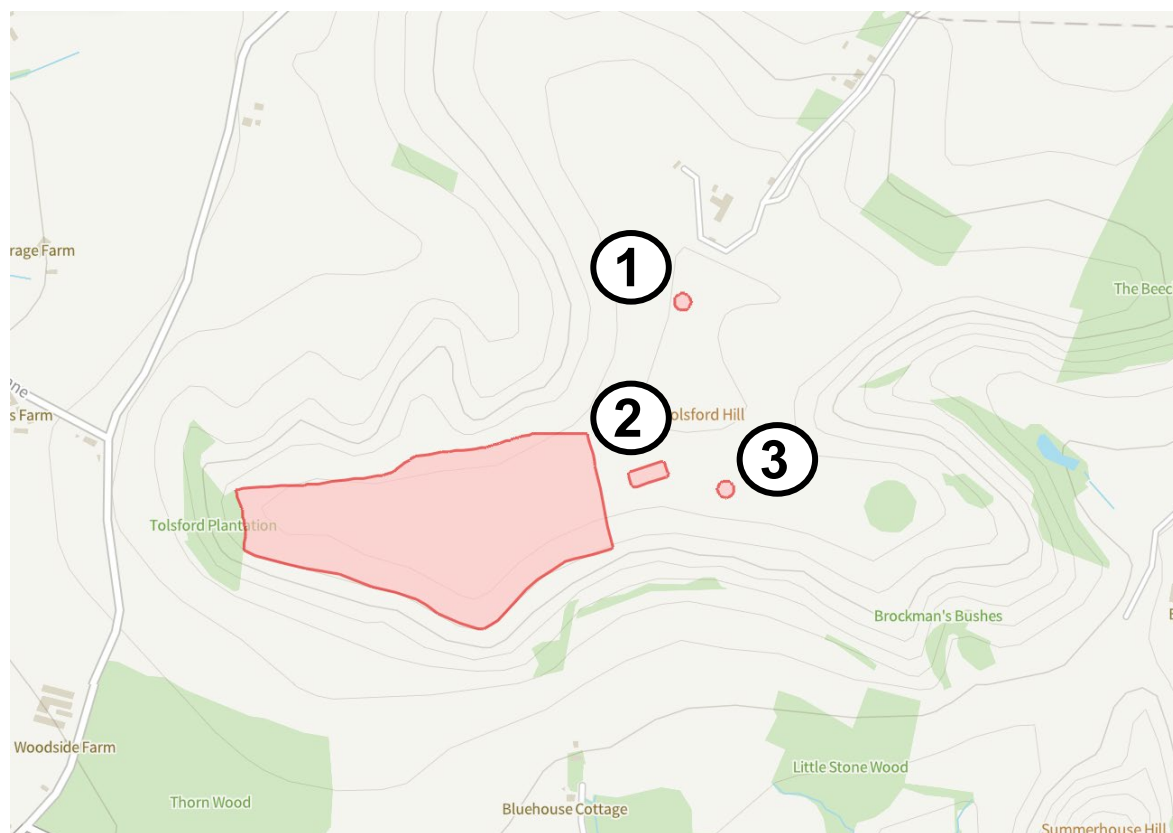


Figure 12 – HE Map Group B

- 4.18 Group B is composed of; (1) Bowl Barrow 225m S of Tolsford Hill telecommunications mast (Scheduled Monument, List Entry Number: 1012269) (2) Two bowl barrows 700m east of Tolsford Plantation on Tolsford Hill (Scheduled Monument, List Entry Number: 1012271) (3) Bowl barrow 250m west of Brockman's Bushes plantation on Tolsford Hill (Scheduled Monument, List Entry Number: 1012275). The large scheduled area is the World War I Practice Trenches, Tolsford Hill (Scheduled Monument List Entry Number: 1463181) and is not included in the scope of this assessment.
- 4.19 These are located to the east at a distance over 5km from the boundary of the application site. Tolsford Hill is a high point in a relatively flat and undulating landscape and affords views out across the surrounding area. The Barrows are located on the far side of the hill away from the site. Implying they have a more of a tangible relationship to the landscape to the east. Assets were all listed in 1964.
- 4.20 Their significance is predominantly derived from their historic and archaeological interest, as rarely surviving buried funerary earth work features The monuments in Group Value B are all collectively identified in their respective listing descriptions as having a group value which demonstrates the importance of the locality for burial in the

Bronze Age. They retain evidence of their methods of construction and evidence the attitudes and practices of Bronze Age funerary rites and are regarded to have potential for further buried remains, although these monuments have been disturbed in the course of military training. The monument near Brockman's Bushes further east survives to a greater extent both locally and comparatively to others in the region.

- 4.21 The special interest is therefore related to the level of survival as group of barrows with above-ground and buried remains, their relative diversity in form, and their historic interest which considered contextually contributes to and understanding of the range of approaches to Bronze Age funerary practices.

Setting

- 4.22 The setting of these assets is defined by their proximity to Tolsford Hill as the local high point. The hill gives views out towards the surrounding countryside where other landscape features are apparent although not directly to the group of scheduled monuments at Group A. The immediate setting of these monuments remains well preserved, the higher ground around Tolsford Hill remains open and isolated, in use only practically for grazing and at one time a military site it remains undeveloped and is where the monuments position on the hill can be best appreciated. Views of the wider landscape from the elevated position commonly feature modern infrastructure (the M20) and urban development, set amongst the largely agricultural fields.

Contribution of Setting to Significance

- 4.23 The presence of Barrows within the site boundary means that the site forms part of the wider Bronze Age Funerary Landscape and therefore contributes to the significance of these monuments. The arrangement and layout of multiple burial structures within the landscape provides insight into Bronze Age social structures, religious beliefs, and burial practices. Because the landscape holds monuments from a range of different time periods, the monuments contribute to an understanding of the evolution of burial practices over time. The positioning and alignment of a barrow within the funerary landscape can hold symbolic significance, as either aligned with celestial events, other burial structures, or important geographical features, including proximity to water sources, natural landmarks, or strategic positions, (such as Tolsford Hill) and provides insight into about the society's relationship and the importance attached to specific geographical features and the wider landscape.

Landscape Character

4.24 *Shepway District High Level Landscape Appraisal (HLLA) – Feb 2017* – produced by AECOM (HLLA). Was specifically intended to inform the opportunities and constraints for growth with regard to landscape character. This report sits alongside other key evidence based documents and informed the Council's adopted Core Strategy Local Plan.

4.25 This identified the wider landscape surrounding Sellindge. The assessment identifies the site, immediate area and Sellindge itself as being located within Landscape Character Area (LCA) 09 Sellindge.

4.26 The key characteristics of the LCA are identified as:

- *Gently undulating;*
- *Dispersed linear settlement alongside roads;*
- *Mixed agricultural landscape*
- *Moderate tree cover from hedgerow tree belts;*
- *Low tranquillity; and*
- *Sense of enclosure*

"The LCA comprises a gently undulating landscape north of the M20 motorway. It is a mixed agricultural landscape with small areas of pasture located on more undulating ground and around settlement, and larger arable fields in the north and close to the M20. Fields in the area are generally bounded by hedgerows and belts of trees. There is moderate tree cover in the LCA, giving some areas a sense of enclosure. Settlement in the area is focused around Sellindge but extends in a linear manner along roads leading out of Sellindge. Roads through the LCA include the A20 and a number of minor roads, with settlement generally dispersed along the roads. Tranquillity in the LCA is affected by the M20 to the south."

4.27 The appraisal assesses the sensitivity of each area. Landscape Character Area (LCA) 09 Sellindge is scored at '0' with a medium sensitivity. The site however forms only a small part of this area and notably sits adjacent to the M20 corridor scored -8 and assessed as having low sensitivity (pages 37-38)

The Sellindge Masterplan (2011) provides a landscape assessment which includes an Visual Study and assessment which divided the area into a number of district parts,

assessing their relative sensitivity in 5 categories from High-Low. It shows an area covering the site as L1 marked as 'Low Sensitivity' - the lowest designation. It notes how the area has '*good visual containment*'. It goes on to say that; *This site has a high suitability for development with relatively minor landscape and visual effects.*

- 4.28 We are in agreement with these assessments and note the condition of the site has not changed significantly since the reports were produced in 2011 and 2017. The thorough assessment of the surrounding landscape and heritage of the area notes nothing of the contribution of the any of the fields surrounding Sellindge having any contribution to the wider funerary landscape setting of the long barrows.

5. ASSESSMENT OF IMPACT

- 5.1 It is important to note the areas in which the monuments are located have been covered by the LVIA. Group A in views 8 and 9 LVIA 2016 and Group B in view G of the LVIA 2017 Addendum. The selection of views was supported by Zone of Theoretical Visibility Mapping and presented to the council at the outline stage of development. The issues cited by HE with regards to the Scheduled Monuments have not been cited previously for this proposed scheme.
- 5.2 The response from F&HDC (Anthony Swaine Architecture Ltd, Shepway District Council Conservation Consultancy Advice, on behalf of Folkstone & Hythe District Council in 2017 did not make any mention of the effects upon landscape setting of barrows. Instead identifying the most sensitive views as being from the north notably '*Farthing Corner around 2.5km to the North*'. The heritage advice for the outline scheme also notes the provision of a landscaping scheme would assist in alleviating the impact of the development's appearance within the landscape – The proposals landscaping scheme made up Condition 1 of the outline application and has been the subject of a Reserved Matters application 21/0279/FH. Which resultantly has reduced the potential visual impact of its appearance within the landscape.
- 5.3 The specific effects on the significance of Barrows within Groups A and B are assessed below, with a particular reference to the how the proposals and cumulative development effect upon the funerary landscape setting.

Group A

- 5.4 These assets are located at distances between 500m-1km from the southern boundary of the site, beyond the M20 and railway line. There is no direct visual intervisibility between these assets and the application site. Views are blocked by hedges, field boundaries and existing built form along Barrow Hill, the railway and M20 which forms a strong visual barrier. Due to the presence of the M20 an appreciation of how the setting of these assets lend significance is predominantly expressed in the areas to the south of the M20. Within their close proximity and where the motorway does not form a visual impediment to more open views of the landscape. Nevertheless, intervisibility between these assets is similarly restricted due to the A20 and how it intersects with Otterpool Lane and turns west.
- 5.5 These sites are recently listed and subject to Archaeological Assessment conducted by Historic England. This has developed the understanding the exact layout and

significance of the archaeological sites, and the relationship with one another in the wider landscape. The assets are best experienced from within their close vicinity, where the open context is most appreciable. Although they have a group value, the assets have almost no Intervisibility between them, due to existing built form, infrastructure and field boundaries and therefore the contribution that the wider setting makes to special interest has been diminished as a result. There is also no direct visual intervisibility with the site and the assets identified.

- 5.6 While development within the site would effect upon the surrounding landscape, by increasing the general sense of urbanisation, this would do little to effect upon the interpretation or the experience of the monuments in Group A. The presence of Barrows within the site, which are hierarchically subservient to the burials in Group A, were covered over by an Iron Age field system, and have had a very low presence in the landscape for at least 1000 years. The site is noted in local character appraisals for its low level of contribution to landscape setting by virtue of its topography, existing character, the location adjacent to existing development, the dominant presence of the M20 and by virtue of being accessed from the main road through Sellindge. The effect on the landscape setting of these monuments would therefore be negligible. The landscaping scheme reinforces the presence of the Barrows on the site enhancing the legibility of the funerary landscape. Importantly the amendments to the scheme would not amount to any additional effects on the landscape setting, which have not already been considered at outline stage. When considered with in NPPF terms, the change is not regarded as being harmful.

Group B

- 5.7 These assets are located at distances over 5km from the eastern boundary of the site, at the top of Tolsford Hill. There is no direct visual intervisibility between these assets and the application site. Views are blocked by the prow of the hill.
- 5.8 The assets are largely defined by the experience of Tolsford Hill and are best experienced from the hilltop where the prominence of the hilltop and the relationship the assets hold to this feature can be appreciated. Views out towards Sellindge are not possible from the scheduled monuments themselves due to topography however views towards the application site from the top of the hill are available which also feature the settlements of Postling, Stanford, and Westenhanger along the route of the M20, other clusters of built form and infrastructure are also clearly appreciable within the landscape. The development would appear largely as part of the existing conflation of urban development in Sellindge surrounding the village core with only a very small impact on the setting of these monuments. There is no public access to these vantage points but where apparent the proposals would not visually dominate or detract from the historic

character of the barrows and their surroundings. The development would not appear within any direct sightlines between groups A & B or any associated other landscape features.

- 5.9 Because of the low level of potential impact upon the landscape setting of these monuments, and lack of impact upon any visual connections. The proposals are not considered to cause any harm to these assets.

Summary

- 5.10 The assets within Groups A & B are located at distances of 1km-5km away and separated by significant volumes of intervening buildings, agricultural fields and infrastructure including the M20. In considerations of the site with the context of the wider funerary landscape. The discovery of the remains of barrow mounds of the site following the 2019 consent has increased the contribution the site makes to the legibility of the surrounding historic landscape, which was formerly exclusively related to the site appearing as open land. The contribution however remains low, due in part to the area inherent lack of visibility of the site, (as a result of local topography, mature hedgerows, and the layout and orientation of surrounding built form), and the lack of any clear historical connection between the barrows within the site and those in Groups A & B, beyond their comparable age and location.
- 5.11 While it is acknowledged that further urbanisation within the wider landscape has the potential to effect upon the historic interpretation of these features, through change within their setting, it is important to consider how these features now occur within a landscape which has been significantly altered by agriculture and infrastructure development. The M20, railway line and both existing and consented form within Sellindge run between the site and these assets. Where the development would be apparent from the landscape in which these monuments are also experienced it would appear as part of the conflation of development already existing within Sellindge. While the barrows which occur within the site exist as part of 'the wider funerary landscape' there is no directly discernible relationship between the assets in groups A & B beyond this. Therefore the development would not impact upon the most important components of the monuments special interest and although there would be change to the wider landscape, the design the proposed development has an emphasis on careful landscaping, and a subtle appearance. It has enforced natural barriers, maintained a good separation between houses to preserve the village and landscape character and retains a sense of openness. This would preserve the visual integrity of the barrows and the integrity of the wider funerary landscape. By 'reforming' of the mounds as part of the landscaping scheme, the ability to evoke the historical depth of the landscape and offering a greater sense of connection to the wider funerary landscape. The significance

of the assets in Groups A & B would be wholly preserved, and their potential to reveal the cultural links between barrows and their prehistoric communities would remain intact.

Cumulative context

- 5.12 The surrounding area has seen fairly consistent development occurring since 1960's. There are a number of emerging housing schemes in the area, which have come forward recently located at; Otterpool Park (Y19/0257/FH) set out in the *New Garden Settlement in the North Downs Area – Joint Delivery Statement between Folkstone and Hythe District Council (LPA) and Otterpool Park LLP*. Smaller clusters of dwellings in land to the south at Land Adjoining The Mount, Barrow Hill, Sellindge (Y18/1035/FH), and the developments surrounding the Sellindge village Core at Land Adjacent the Surgery, Main Road, Sellindge, (Y14/0873/SH), Land At Elmtree Farm, Main Road, Sellindge, Ashford (23/1413/FH) - Currently Under Consultation
- 5.13 The effect of the above development upon the wider landscape setting of these monuments varies. Group A would be entirely subsumed by the masterplan set out in the scheme Otterpool Park, which largely runs along the southern edge of M20, and similarly takes in Westenhanger Castle. The proposals in this location are subject to a heritage strategy and have involved consultation with HE and KCC. The creation of a 'New Garden Settlement' although conceived along the principles of landscape harmony would generally increase the sense of urbanisation in the wider area. However, the development of the Land Adjacent the Surgery, Main Road, Sellindge, and Land at Elmtree Farm, Main Road, Sellindge, north of the M20 would more readily read as a natural expansion of Sellindge and gentle intensification of the village core. Occurring within the context of existing village development and adjacent to established and historic routes and clusters of buildings.
- 5.14 While there is an effect on the Scheduled monuments in Group B through a change to the appearance of the wider landscape, the effect would however only be minor due to the extent of historic change. It is important to note all schemes coming forward, have inbuilt landscaping schemes, designed specifically to reduce the potential visual impact, retain character and preserve setting. As the change is predominantly related to rural character, and the appearance of development sites, and urbanisation in views out across the landscape, it is important recognise the most important views to and from the scheduled monuments will be preserved and the open immediate setting surrounding them would be unaffected. The developments above, all occurs within the context existing infrastructure, largely allocated for development within the Sellindge masterplan. The sites noted above have specifically conceived to read as a natural expansion of the village and although taken cumulatively the effects may be regarded as

having a degree of harm to the landscape setting of these monuments though erosion of their aesthetic isolation and historical relationship to the landscape. This effect is at a low level that does not threaten the primary factors of the monuments special interest. With specific regards to the site itself, any aggregated effect would be diminutive. The overall visual integrity of the monument's setting would be preserved, due to the distances, visual separation, low sensitivity of the site, and the development appearing as part of the existing conflation of the village. The amendments to the scheme would not amount to any additional sense of urbanisation or landscape impact which has not been already considered within the outline application.

6. CONCLUSION

- 6.1 This Heritage Statement provides a focused assessment on the effects upon the landscape setting of Scheduled Monuments noted in the consultation responses from KCC and HE for application 23/1324/FH *Proposed development at Rhodes Park Sellindge*.
- 6.2 While we understand Historic England's Concerns over the potential erosion of the areas landscape character, and the effect of cumulative development. It is important to consider that the principle of development was established with the site allocation, Sellindge Masterplan and secured with the outline permission. Opportunities to comment on the landscape effects of the wider funerary landscape within the context of cumulative development have been presented at Core Strategy Review, the Outline Permission stage, and the during the review process for the masterplan for Otterpool Park. Concerns on the effects of the wider funerary landscape and have not been raised previously in relation to this site.
- 6.3 The effects of the development in this regard have also already been assessed within an LVIA and LVIA Addendum. This assessment affirmed the conclusions of this report and has further demonstrated that; due to the nature of the site as having a relatively low presence in the landscape, the distance from the groupings of Scheduled Monuments, intervening built form, and the nature of proposals (which would remain within the developable area of the site approved in outline), the effects would not be harmful.
- 6.4 This assessment has followed the process outlined in GPA3 As per Step 1 we have identified which heritage assets and their settings are potentially affected. As per Step 2 we have assessed the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. As per Step 3 we have assessed the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
- 6.5 The barrows present on the site will have a greater degree of definition as a result of the landscaping scheme, earth has been used to reinforce their form (as approved in the reserved matters landscape scheme). reinstating a bronze age feature which was eroded historically in the course of defining field boundaries. Thereby enhancing their legibility as a landscape feature, and the bronze age funerary aspect of the landscape.

- 6.6 There are no direct views towards Sellindge where the development would appear within the context of the Scheduled Monuments. only the wider landscape setting. Where apparent in the landscape, the development would appear as a part of the existing conflation of Sellindge. The experience of these monuments within open fields, with views outwards to other open fields would be preserved, the landscape remains characterised by its former agricultural use and as such, the remains of this landscape including mature hedgerows and boundaries, restrict views. Meaning the landscape context and the relative isolation when experiencing these assets would not change as a result of the proposals at Rhodes Park. This assessment therefore finds the effect on the interpretation of these monuments and position in the landscape would therefore be diminutive and would not likely meet the threshold for harm, while an effect is noted on the potential contextual experience of these assets through change within their wider setting. It is considered to be so low as to be negligible. The scheme is cognisant of the areas landscape sensitivity and so has adopted a carefully considered landscaping scheme. One which has undergone further development since the outline scheme was first approved. The scheme carries a number of embedded design mitigations within the landscaping plan which seeks to preserve the sense of openness and key elements of the areas countryside character including the reinforcement of the barrows within the site.
- 6.7 While we note a number of developments are appearing in the near area and the potential for cumulative effects, the change to landscape setting is one that has been expected in local policy, exemplified by much of the surrounding area being allocated in the local plan and assessed for its suitability for development within the *Sellindge Master Plan* and the *'New Garden Settlement in the North Downs Area – Joint Delivery Statement'*. The change to character of the wider area has fundamentally already been anticipated.