

Anske Bax Heritage Consultant

HERITAGE STATEMENT

Planning & Listed Building Consent Required

at

The Manor House, Newchurch, Romney Marsh, TN29 0DL

For

Outbuilding within the land to the north of Manor House

Anske David Bax, *Supporting member of*



04/03/2024

Anske David Bax, BA, M.Sc. PhD Candidate
Built Heritage & Consultant Archaeologist

Old Post Office School Lane Kent
CT4 5ER

Supporting Member of The Institute of Historic Building
Conservation
Member of The Centre of European Research for Architecture
Archaeologist and Supporting member of ClfA Chartered Institute for
Archaeologists
Academic Researcher & Advisor in Architectural Conservation
Practitioner Lecturer in 'Ancient & Medieval Architecture' at Kent University
Practitioner Lecturer in 'Renaissance to Neoclassical Architecture at Kent University

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CONTENTS

1.0 INTRODUCTION

2.0 THE SITE CONTEXT- LOCATION & DESCRIPTION

3.0 DESIGNATION

4.0 PLANNING POLICIY & LEGISLATIVE FRAMWORK HERITAGE

5.0 METHODOLOGY

6.0 HISTORICAL DEVELOPMENT & SIGNIFICANCE

7.0 PROPOSED WORKS & IMPACT ASSESSMENT

8.0 CONCLUSION

9.0 BIBLIOGRAPHY

1.0 INTRODUCTION

1.1 This Heritage Statement and Impact Assessment has been prepared by Heritage Consultant Anske David Bax, on behalf of the client Mr. J Ghaemian, in support of a retrospective Planning and Listed Building Consent Application for the below minor development:

Outbuilding of a timber frame cabin.

at

The Manor House, Newchurch, Romney Marsh, TN29 0DL

(Hereafter referred to as the 'site'), as shown on the submission Site Location Plan. The site is located within the jurisdiction of Folkestone and Hythe District Council.

1.2 The application submitted to Folkestone and Hythe District Council as the local planning authority is set out below:

“Outbuilding within the extended residential curtilage”.

1.3 This report has been commissioned to provide an impact assessment for the retrospective cabin within the setting pertaining to any potential impact upon the significance of the setting of the heritage asset. As such, this assessment provides clarification on the site's designation and significance, with focus on the works in particular, scale, height, mass, materials, and the associated impact level in line with Historic England Guidance.

1.4 *Paragraph 194 of the NPPF sets out that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In this case, this requires an assessment of the significance of the Grade II Listed building.*

1.5 This heritage statement addresses the above in accordance with Paragraphs, 132-135, and 194 of the NPPF, and sets out the heritage context, policy, and provides a Heritage Impact Assessment. The statement covers key heritage policy parameters, significance, and a salient analysis of the outbuilding within the setting to present a supporting heritage case for what is considered an appropriate development that neither detracts nor enhances the significance of the heritage asset. A conclusion that conforms to national and local policy in heritage terms.

2.0 THE SITE- CONTEXT

2.1 The outbuilding in questions sits to the northeast of the Grade II Listed building, known as The Manor House (**1061138**). The building is an early 19C rectangular house, comprising of neo-classical features, such as pediments, central flat headed porch, and regular window fenestration.

2.2 The subject site sits within the historic settlement of Newchurch.

2.3 The site today comprises of formal garden land to the front, with a delineated space between the heritage asset and a range of low-lying outbuildings to the rear.

2.4 The wider area comprises of a mixture of later 20C architecture that have little architectural merit.

2.5 Manor House falls within the Parish of Newchurch and is now the principal settlement therein.

2.6 A 1km radius was used to identify potentially affected built heritage assets within the vicinity of the Site. Within this search area, there were NO identified heritage assets.



Fig. 1 Site Map (Google 2024)

3.0 DESIGNATION

3.1 The subject site in question is Grade II Listed **1061138** (See Fig.2, Historic England).

3.2 The site was first listed on the 22nd April 1985.

3.3 *Details- House. Early C19. Rendered with plat band and cornice-band to parapet hiding roof with two ridge stacks. 2 storeys; regular 5 window front. Glazing bar sashes. Central flat-headed porch with cornice, round-arched entrance in square-headed recess, panelled door and arched side windows. 2 single-storey canted bays on ground floor of right return front.*

3.4 The site sits within the wider settlement of Newchurch, made up of a mixture of sporadic later 20C architecture.

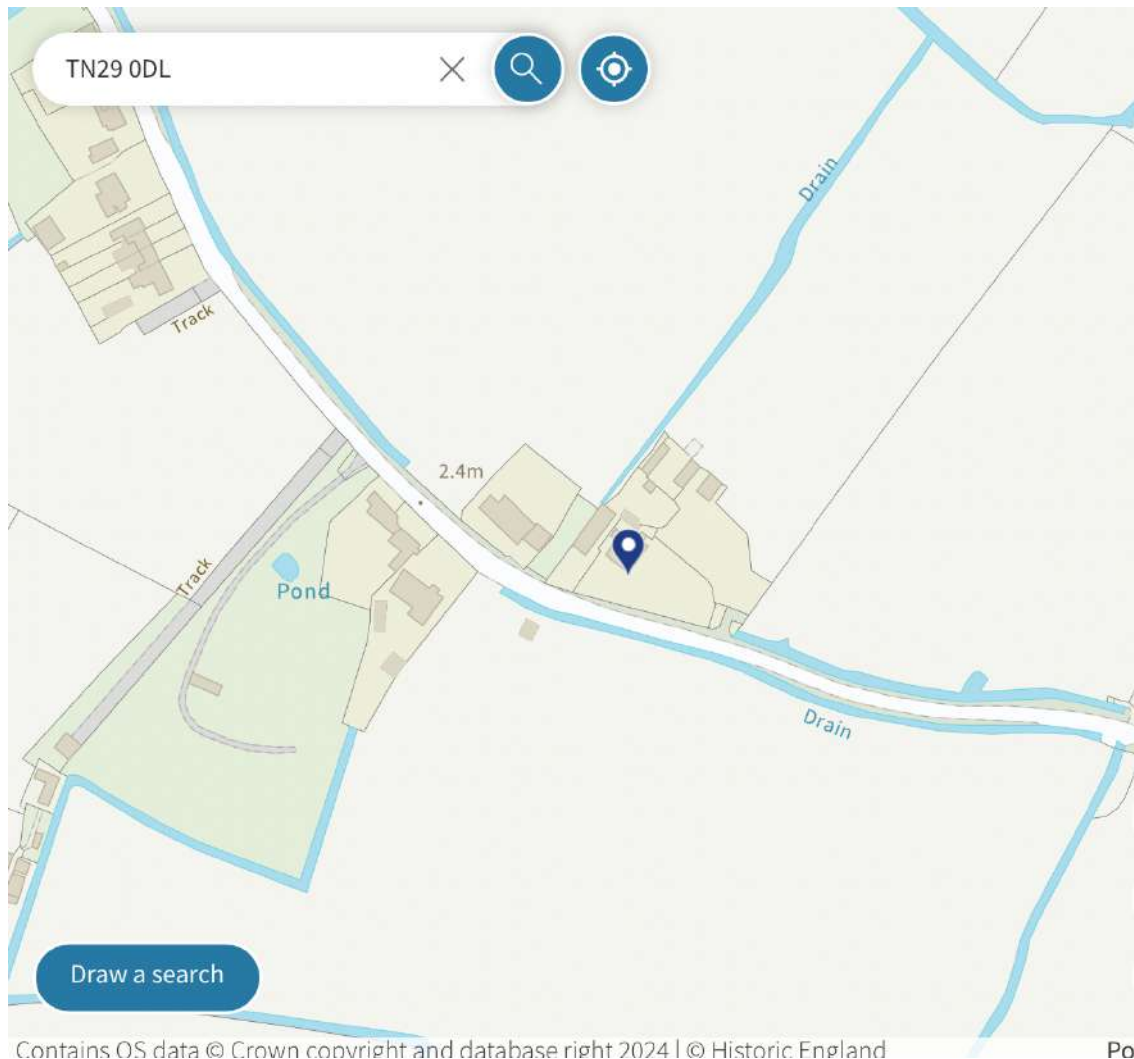


Fig. 2 Listing Map (Historic England 2024)



Fig. 3 Manor House (Anske Bax)

4.0 PLANNING POLICY & LEGISLATIVE FRAMEWORK

4.1 NATIONAL – Heritage Considerations

4.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990).

4.3 The relevant legislation in this case extends from Section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.

4.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides a statutory duty with respect to Listed Buildings for the decision maker 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”. No such statutory duty exists for scheduled monuments.

4.5 Issues for LBC and planning permission are judged against the content of the National Planning Policy Framework (September 2023) – the NPPF. The concepts which underpin consideration of the historic environment under the NPPF are applicable to all heritage assets and in its 2013 policy statement the DCMS makes it clear that when deciding issues of SMC it will follow similar concepts, including whether low levels of harm to significance might be outweighed by the public benefits of permitting some works (para 20).

4.6 Paragraph 132,133 &134 of the NPPF, state that “design should be considered throughout the evolution and assessment of individual proposals”. And that Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes.

4.7 Paragraph 135 of the NPPF states that “ Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).at paragraph 197, states that an application that affects a heritage asset should be determined by taking account of the following: the desirability of sustaining or enhancing the significance of the asset; the positive contribution that conservation of the asset can make to a sustainable community; and the desirability of new development making a positive contribution to character and distinctiveness”.

4.8 Paragraph 199 of the NPPF 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

4.9 Paragraph 202 of the NPPF advises 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.”

4.10 *Paragraph 190 of the NPPF states that*

- (a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- (b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- (c) the desirability of new development making a positive contribution to local character and distinctiveness; and (d) opportunities to draw on the contribution made by the historic environment to the character of a place*
- (d) The proposals retain the historic character, significant features and heritage values attributed.*

4.11 The NPPF defines a heritage asset 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’. This includes both designated and non-designated heritage assets.

4.12 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are ‘*an irreplaceable resource and should be conserved in a manner appropriate to their significance*’.

4.13 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.

4.14 Under ‘Considering potential impacts’ the NPPF emphasises that ‘great weight’ should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

4.15 The following chapters are relevant to the proposal:

Chapter 12 – Achieving well-designed places.

Chapter 15 – Conserving and Enhancing the Natural Environment

Chapter 16 - Conserving and enhancing the built environment.

4.16 LOCAL- Heritage

**4.17 Local – Folkestone & Hythe District Council Core Strategy (Adopted 2011)
Allocations and Development Management Plan (2015)**

The Development Plan for the Folkestone and Hythe district comprises the Places and Policies Local Plan 2020 and the Core Strategy Review 2022.

The relevant policies are set out below:

Places and Policies Local Plan 2022

- Policy HB1 – Quality Places Through Design
- Policy HB3 – Internal and External Space Standards
- Policy HB9 – Annexe Accommodation
- Policy HE2 – Heritage Assets
- Policy NE3 – Protecting the Districts Landscapes and Countryside

Kent Design Guide (2005)

The Kent Design Guide seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas.

5.0 METHODOLOGY -ASSESSMENT OF SIGNIFICANCE

The significance has been articulated in accordance with the heritage values set out in Historic England's Conservation Principles, Policy, and Guidance (HE, 2008), published by Historic England. It also considers if, how and to what extent the site relates to that significance. The description of significance is accompanied by an assessment of the level of that significance as defined in Table 1.

Table 1- Levels of significance rating criteria

Heritage significance	Criteria
High	Designated heritage assets of national or international significance: world heritage sites, scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and protected wrecks. May be: conservation areas of demonstrably national / international significance (usually found in conjunction with one or more of the above mentioned asset types). Non-designated heritage assets that meet the criteria for statutory designation or are of equivalent significance.
Medium	Conservation areas and non-designated heritage assets of regional significance. May be: locally listed buildings or locally listed parks and gardens, sites of archaeological interest as noted on the HER, previously unidentified non-designated assets of demonstrably regional significance.
Low	Non-designated heritage assets of local significance. May be: key features in a conservation area, buildings / areas / parks and gardens identified on the HER or historic maps, isolated archaeological finds as identified on the HER, previously unidentified non-designated assets of demonstrably local significance.
Uncertain	Non-designated heritage assets whose significance could not be ascertained.

POTENTIAL HARM TO THE ASSET OR SETTING

The heritage significance of Manor House is considered medium given its historic and architectural contribution to the local vernacular of Newchurch. It is considered the outbuilding/annexe, given design, scale, and distance to the northeast of the principal house, neither detracts nor enhances the Listed Building. Therefore, it is considered a neutral impact upon the setting of the site. Therefore, the potential level of harm to the significance of the setting was assessed, in accordance with step 3 of Historic England's HEAN 3 (2015). This level was assigned in relation to the harm that an asset or setting might experience, but the descriptive assessment also identifies any neutral or beneficial changes where applicable. The criteria for these levels are as follows:

Table 2- Potential harm relating to asset.

Potential harm to asset	Criteria
High	The significance of the heritage asset would be lost or substantially harmed by the development.
Medium	The significance of the heritage asset would be harmed but not substantially.
Low	The significance of the heritage asset may be harmed but that harm would be minor.
None	The significance of the heritage asset will not be harmed.

This final step in the assessment takes the potential harm to the asset/setting and considers that against its relative significance level in order to establish a proportionate level of effect on the historic environment overall. The criteria for these levels are as follows:

Table 3 -Level of Effect

Level of effect	Criteria
High	Asset is of high or medium significance and the magnitude of change is likely to be of such a scale that the significance of the heritage asset would be substantially harmed.
Medium-high	Asset is of high or medium significance and the magnitude of the change is likely to be of such a scale that the significance of the asset would be harmed but not substantially.
Medium	Asset is of low significance and the magnitude of change is likely to be of such a scale that the significance of the asset would be substantially harmed.
Low-medium	Asset is of low significance and the magnitude of change will be of such a scale that the significance of the asset would be harmed but not substantially; or Asset is of high or medium significance and the magnitude of change is likely to be of such a minor scale that the significance of the asset will only be marginally affected.
Low	Asset is of low significance and the magnitude of change is likely to be of such a minor scale that the significance of the asset will only be marginally affected.
None	Asset of high, medium, or low significance where the development of the site does not interact with the asset or its significance. The development may still be perceptible as a change to the asset's setting, but this change would not harm the significance of the asset.

CRITERIA FOR ASSESSING SIGNIFICANCE

In heritage terms, significance is defined as a place that 'embraces all the diverse cultural and natural heritage values that people associate with it, or which prompt them to respond to it. These values tend to grow in strength and complexity over time, as understanding deepens and people's perceptions of a place evolve. '(Historic England, Conservation Principles Policies and Guidance, 3.2, 2008). Therefore, significance encompasses not just the physical fabric, but also the setting, contents, use, history, tradition, and heritage context of a place. Consequently, cultural significance is unique to each place and the relative significance can vary from element to element and building to building.

This element of heritage values is separated into four categories- Evidential, Historic, Aesthetic, Communal

Evidential Value: A measure of heritage significance derived from "*the potential of a place to yield evidence about past human activity*" – that is, the physical fabric of an asset and its capacity as the main source of information on the place and its past. Age and rarity are important indicators of the degree of significance but are not always paramount. The less historic fabric there is (e.g. where it has been removed or replaced) the less it can be used to evaluate significance and so the less it can contribute to our overall understanding of significance; however, sometimes incomplete physical remains are all that is left to judge significance – such as archaeological deposits – and when they are the only source of information their importance is paramount.

Historical Value: A measure of heritage significance derived from "the ways in which past people, events and aspects of life can be connected through a place to the present" – that is, what the place can tell us about the past either by illustrating it or by association. ILLUSTRATIVE significance is how the place visually reveals the past, helping us to understand and interpret it. Significance can be increased if the place is still in its historic use and its historic context. ASSOCIATIVE significance is where a place is linked to important people or events, or to movements or cultural expression (e.g., in art or politics). Here, rarity, authenticity and completeness are important, but a place can still have historical significance even when altered – indeed, the evolution of a place over time and the story this demonstrates can be central to a place's significance.

Aesthetic Value: A measure of heritage significance derived from "the ways in which people draw sensory and intellectual stimulation from a place" – that is, our experience and reaction to a place. It is primarily visual but can also relate to the other senses. It can be influenced by conscious DESIGN, such as the proportions or detailing of a building or the layout and planting of a landscape, or it can relate to a specific style, movement, patron, or designer. Here, quality, craft, innovation, and influence are important.

Communal Value: A measure of heritage significance derived from "the meanings of a place for those who draw part of their identity from it, or for whom it figures in their collective experience or memory" – that is, our emotional attachment to a place and how we relate to it.

6.0 HISTORIC OVERVIEW & SIGNIFICANCE

**(Historic, Evidential, Aesthetic,
Communal)**

6.1 The Manor House started as a large dwelling possibly serving the wider agricultural communities in the early C19. Historic map data clearly highlights the building dating prior to the 1870's (see Maps) of the Kent Historic Environment records.

There is little recorded evidence of ownership and dates of construction. The architectural evidence suggests a post medieval brick construction with stucco finish in white with a neo-classical appearance. The evidence of late C19 alterations of the neo-classical period are on the exterior finish.

6.2 Historical Development of the Farmstead – Mockbeggar Farm

1870-1891

The Historic map data demonstrates the Manor House once formed the principal house of what may have served as a farmhouse. The historic map of 1870 clearly highlights evidence of substantial ancillary structures built to the rear on the northern axis (See Fig. 4).

The built structures along the northern axis were most likely agricultural storage facilities, including storage, barns, and possibly ancillary accommodation for arable workers given the extensive nature of the buildings.

Based on the map data, the 1870's represents the height in the site's agricultural productivity and wealth.

1891-1900

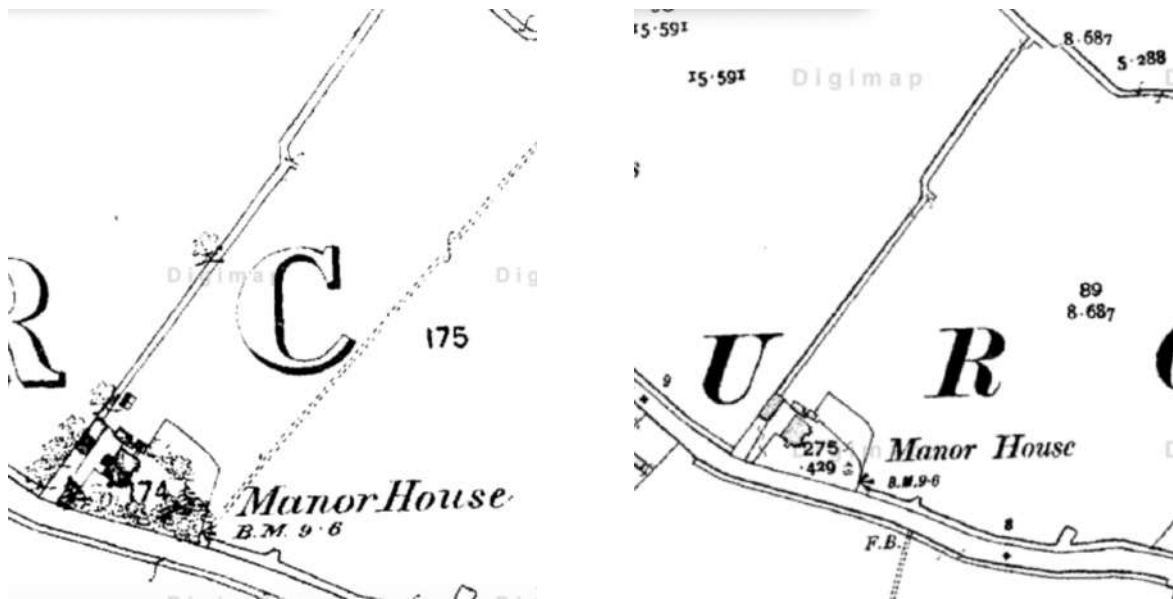
By the late 1890's we see a reduction in the number of ancillary structures to the north serving the Manor House. The map data is most useful here in clearly identifying roofed buildings to accommodate storage or potential accommodation for workers (See below figures 4,5).

It is clear the large and narrow building to the far north of the site serving possibly as a barn is removed. Another smaller structure to the north is also removed.

The decline in buildings and degradation of ancillary structures is seen within the wider national decline of arable and agricultural economies in the late 19C.

Decline in Agricultural Industries

The decline of English agricultural economies in the late 19th century was a complex and multifaceted process driven by various economic, technological, and social factors.



Figs. 4, 5, Historic Maps 1870 left, and right 1900 (Kent Historic Environment Record)

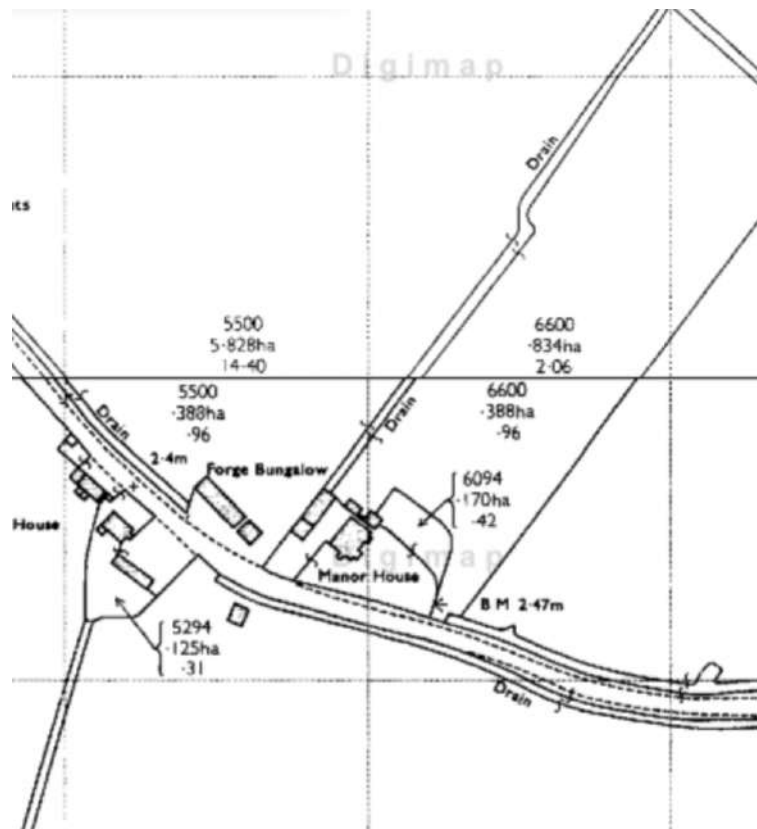


Fig. 6, Historic Maps 1960 (Kent Historic Environment Record)

6.3 SIGNIFICANCE

The significance of Manor Farm derives from its age, scale, architectural detailing, and surrounding open space, together with its relationship with the rural landscape within the wider setting of Newchurch.

The historic and aesthetic significance is medium for its contribution to Neo-classical architecture. The house set back from the road, is a testament to the large houses of the time and represents in many ways a glimpse into past rural economies. The site as such, contributes to a rural vernacular of the County.

The wider setting of the site in its character and appearance is derived from the open landscape surrounding the principal house. The open landscape as a feature of the site, has been more clearly identified from the mid 19C, when the majority of the ancillary buildings were removed. Later clear delineated space between the formal garden to the rear towards the northern land has been established with hedging. The area beyond this is considered of low significance with no historic formal landscaping.

The buildings communal value is low, given the site has never been open to the public nor is it surrounded by public footpaths.

The Listed Building is for the reasons above, considered medium in significance, for its contribution to the regional rural architecture, local history, and rural setting.

7 PROPOSED WORKS & IMPACT ASSESSMENT–

The description of development is as follows:

Outbuilding

The structure is a single storey ancillary outbuilding to provide annexe accommodation in the northern area of the domestic curtilage of the property.

The scheme takes a lightweight design approach, with a simple palette of materials. The size and form echo the historic outbuildings once in place as seen in the historic maps of 1870 (See Fig. 4).

The building would sit to the boundary where an established hedgerow and natural landscape buffer provides adequate screening to the adjacent property and to the heritage asset to the south there is a natural landscape buffer/hedge (See Fig.11). Moreover, further landscaping is proposed Infront of the outbuilding, to provide a soft appearance to the open landscape (see figs).

IMPACT ASSESSMENT- NEUTRAL (NEITHER DETRACTS NOR ENHANCES THE HERITAGE ASSET)

There is no physical harm to the heritage asset, and no historic fabric has been or is proposed to be removed.

The ancillary structure in question is low rise, single-storey, and in mass, volume and scale are certainly subservient to the principal building.

The materials including timber cladding and light weight design helps soften the appearance within the grounds in terms of visual impact on setting. Moreover, the building in question is not seen within the main view of the principal elevation and set substantially back within the rear less important area of the site (See Figs 9,12).

The modern design of the cabin with vertical cladding would allow the legibility of the historic

building to be retained, as it distinguishes between old vs new.

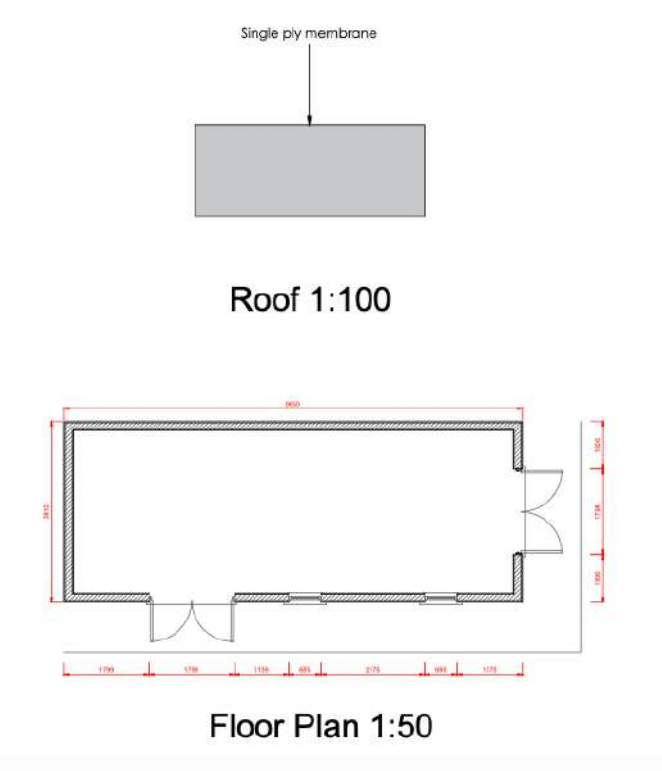


Fig. 7, Roof and Floor Plans (Rubicon Ltd)

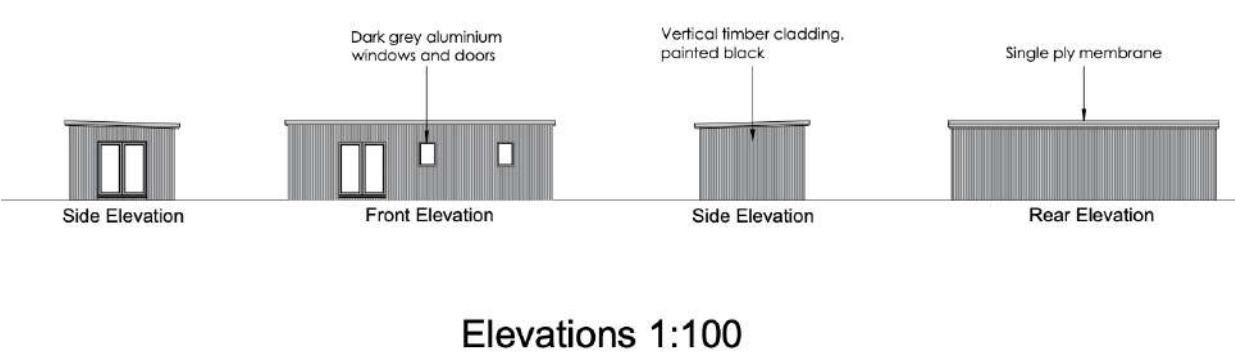


Fig. 8, Elevations (Rubicon Ltd)

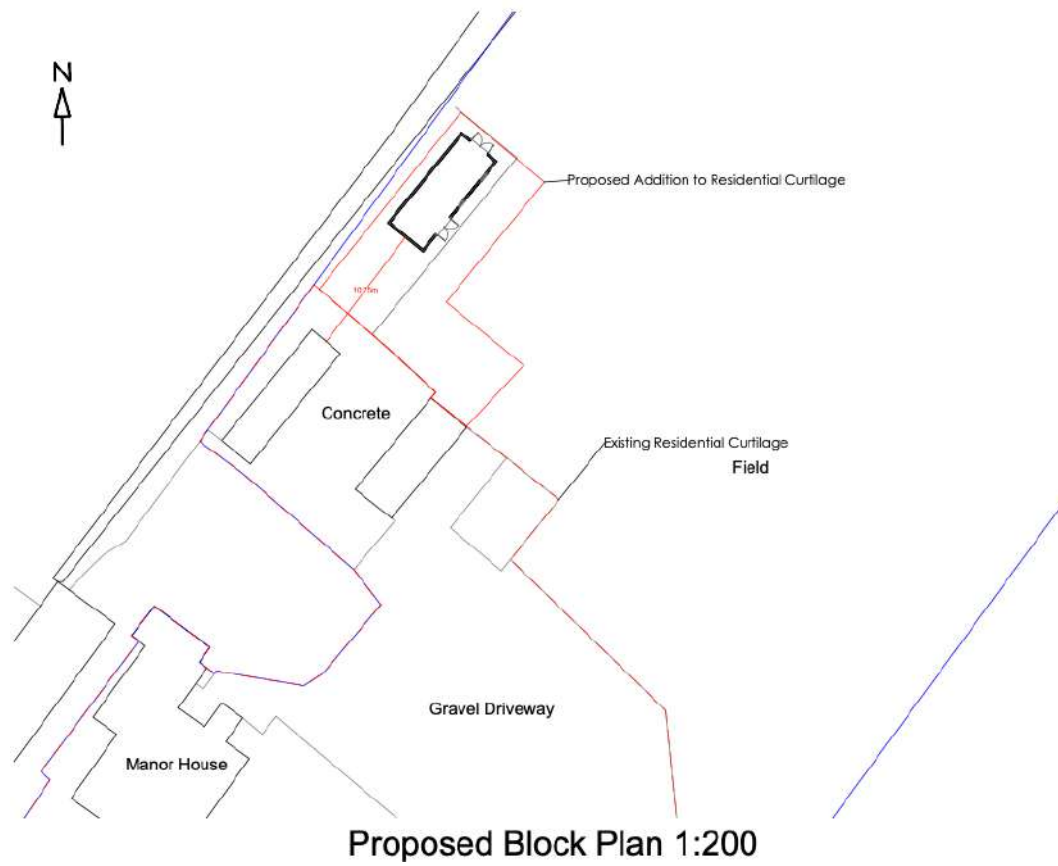


Fig. 9, Site Plan (KDS)



Fig. 10, Photo of the Structure Front Elevation in question (Anske Bax)



Fig. 11, Photo of the setting and previously approved outbuildings (Anske Bax)



Fig. 12, Photo of the outbuilding and setting looking across the northeast land (Anske Bax)

Physical Change: There is no change in the relationship with the public view of The Manor House. It is therefore considered the outbuilding has a neutral impact upon the heritage asset and setting.

Magnitude of Risk of Harm: This is to be of such a minor scale in the carefully designed building, where there is not risk to any original fabric of the designated asset.

Level of Effect: Considering the significance of the setting and area, and the risk of harm to its significance, the overall level of effect of the proposed scheme is again of little or no significance in terms of heritage values.

The proposal includes minor changes that will, on aggregate, result in a neutral impact to the significance of the listed building. The proposal in terms of design, scale and materials will be of a neutral impact upon the significance of the setting.

8.0 CONCLUSION

This Heritage Statement meets the requirements of paragraph 189 of the NPPF and is sufficient to inform the current Planning and Listed Building Consent application. The outbuilding has been assessed in relation to its impact upon the significance of the Listed Building and setting known as Manor House, and its impact is considered Neutral.

The development in positioning, scale, mass, and design is in accordance with Historic England's Guidance (2008) for alteration and additions within the setting of a Heritage asset.

It has been demonstrated that the minor form of development has the potential to impact on the Grade II listed building by virtue of change within the setting. The proposed development is of an appropriate scale, set back substantially within the northeastern curtilage of Manor House, and sits within the context of the surrounding land.

The design of the proposed annex utilizes traditional materials of exceptional quality that when assessed as a whole, is one that is sympathetic and sensitive to the surrounding setting and vernacular of Kent. The proposal therefore maintains and preserves the character of the Listed Building. It is considered the development based on design, scale, and distance, neither detracts nor enhances the Listed Building. Therefore, it is considered a neutral impact upon the setting of the site.

This report concludes that the development preserves the significance of the setting of Manor House and accords with section 66(1) of the 1990 Act and section 16 of the NPPF.

This Heritage Statement meets the requirements of paragraph 189 of the NPPF and is sufficient to inform the current application.

Given the above, it is asked that the scheme should be positively viewed in the context of the NPPF, and the Local Plan and that planning permission is granted without delay in terms of heritage issues.

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- | | |
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