

From: [crayford.ross](#)
To: [gunner.hannah](#)
Cc: [representations.planning](#)
Subject: RE: MC/19/1566 - Land Off Pump Lane, Rainham
Date: 31 October 2019 12:28:46
Attachments: [image002.png](#)

Hi Hannah,

In response to the additional documents submitted by the applicant; in particular the 'Heritage Review – September 2019' and the 'Environmental Statement Technical Appendix 14.3 Heritage Setting Assessment – 28th May 2019' received on 11th October 2019. I've addressed each document in turn, starting with the Heritage Setting Assessment as this provides input into the Heritage Review document.

Heritage Setting Assessment

- The methodology for the Heritage Setting Assessment (point 1.2 and 1.3) note that just 5 heritage assets and 2 Conservation Areas are identified as being in close proximity to the site. We do not agree with this point, as the report omits assessments for:
 - York Farmhouse (grade II Listed and within the Lower Twydall Conservation Area) – located approximately 80m from the proposed development site.
 - 497 to 501 Lower Rainham Road (grade II Listed and within the Lower Rainham Conservation Area) – located approximately 90m from the proposed development site.
 - The Old House (grade II Listed and within the Lower Rainham Conservation Area) – located approximately 70m from the proposed development site.
 - Any non-designated heritage assets.
 - Whilst the omitted designated heritage assets are located within the 2 Conservation Areas, we feel that due to their designation and proximity to the proposed development site they require individual assessments, particularly York Farmhouse.
- Point 2.4 regarding the setting of Chapel House states '*The proposal site is not immediately visible from Chapel House due to the vegetation surrounding the rear garden area of Chapel House; similarly the Chapel House is not immediately visible from the proposal site.*' This is not true, Chapel House can clearly be seen from the proposed development site as demonstrated in the attached '**Photo 1 – Chapel House**'.
- We therefore do not agree with point 2.5 regarding the retention of planting at the boundary of Chapel House, as it is currently limited (as demonstrated by the photo) and partly outside of the control of the applicants in terms of planting in the garden of Chapel House. Furthermore, the character of the surrounding historic landscape that creates the setting for Chapel House is open fields and orchards, rather than mature boundaries.
- Point 2.11 states that Pump Farm is '*almost surrounded by recent residential development*', we disagree in part to this as whilst the setting of the farmhouse has been partially compromised by the development of Russet Farm, the residential development is located on the site of historic farm buildings of Pump Farm.
 - We support the proposal to include a community orchard buffer to the east of Pump Farmhouse as this is characteristic of the historic setting, however we

disagree with the approach of developing a mature buffer between the proposed development and the farmhouse as the character of the surrounding historic landscape that creates the setting for Pump Farmhouse is open fields and orchards, rather than mature boundaries to separate heritage assets from the setting and reduce their visibility.

- Point 2.24 states that there is a '*significant distance between Bloors Place and the proposed development area*'; we do not agree with this statement as the Bloors Place is located just 65m from the proposed development site.
- We cannot support the proposed mitigation (point 2.26) as the setting of Bloors Place is characterised by open fields and orchards, rather than mature boundaries to separate heritage assets from this setting.
- Point 2.33 does not provide a sufficient assessment of the character and significance of the Lower Rainham Conservation Area, instead focussing on the impacts and proposed mitigation to Chapel House and Bloors Place.
 - The significance of the Lower Rainham Conservation Area was described in our comments dated 12th July which explains that its setting that is derived from the local horticultural industry, and to a lesser extent its association with the river. We would therefore contend that the proposed mitigation of mature planting and landscaping falls short of what we would consider appropriate, and is in fact harmful due to the loss of the orchards and open fields that characterise the landscape.
- Point 2.38 states that there is not likely to be a significant impact on the Lower Twydall Conservation Area due to the distance between the proposed development site and the Conservation Area. We disagree with this point as the proposed development site abuts the Conservation Area.
 - The setting of the Lower Twydall Conservation Area is characterised by open fields and orchards which will be partially lost should the development proceed. We do not agree that the proposed additional planting will mitigate this impact.

Heritage Review

- We agree with the description of the proposed development site in point 5 which states that it comprises '*agricultural land laid to orchard... to the north west are open fields leading to Lower Twydall Lane*' which characterises the historic landscape of the area and forms the setting of many of the nearby designated heritage assets.
- We agree with point 10 with regard to the importance of designated and undesignated heritage assets.
- Point 18 is correct in terms of the southern end of the Lower Twydall Conservation Area; however views of the open fields behind can readily be experienced between the buildings within the Conservation Area reinforcing the historic agricultural character. Furthermore, the view of the Conservation Area from the south along Twydall Lane includes a wide open view of both the fields around the Conservation Area as well as the Conservation Area itself, providing a full panoramic view of the Conservation Area and its setting.
- We cannot agree with point 20, as the sense of rural isolation can be readily experienced in the public realm at regular intervals between the hedgerows, as well as by train to the south. We also contend that the tranquillity of the Conservation Areas (particularly Lower Twydall) contributes to this sense of rural isolation.

- We agree with point 22 with regard to the setting of Pump Farmhouse being slightly compromised by the development of Russet Farm, however this was on the site of historic farm buildings of Pump Farm so the farm house may have never been entirely surrounded by fields on all sides and therefore the impact of Russet Farm in this regard is slightly overstated.
- With regard to point 23, we would contend that Chapel House formed the outer edge of the hamlet, therefore the surrounding rural setting is of relevance and importance to its historic significance.
- We disagree with point 25 with regard to Bloors Place, as it is believed to have been adapted in the late 18th century for use as a farmhouse, for which it was used in this purpose for a number of years; therefore part of its historic significance lies within its connection with its agricultural setting.
- We disagree with point 27, whilst there may be some planting around heritage assets near to the proposed development site, this does not disassociate them from their setting because of reduced visibility between.
- In terms of 'the proposals' (points 38 to 50); we maintain that the development of large swathes of land which form the agricultural and rural setting to both Conservation Areas and Listed Buildings within them would have an impact on the significance these designated assets derive from their rural setting. The sense of rural setting is readily appreciable from surrounding roads and pathways and from the train which passes directly to the south of the site and provides elevated views of the site and designated heritage on its periphery. The introduction of development on the proposed scale will alter the historic character of the area, and will be present in numerous views, as well as impacting the rural character in terms of increased vehicular movements, noise and light pollution.
- We therefore disagree with the conclusions of points 52 and 53 as there will be harm of varying levels to the designated heritage assets previously discussed.

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 Whilst I've tried to address as many of the more important points as possible, our previous concerns still remain. We feel that the application still fails to meet the requirements of NPPF paragraphs 190 (in terms minimising harm) and paragraph 194 in terms of clear and convincing justification for the harm. Neither of these paragraphs are discussed in the Heritage Review. Once it is demonstrated that the harm has been minimised and that there is clear and convincing justification for any remaining harm; it should then be weighed against the public benefits of the proposal (paragraph 196). In considering the impact of a proposed development on the designated heritage assets, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be), as per paragraph 193.

With regard to the impact on the designated heritage assets, we would like to direct you to the appeal decision for the 'Land North of Moor Street, Rainham' (APP/A2280/W/15/3012034) which we feel will be helpful in consideration of the application.

I hope this is of assistance, but let me know if you want to discuss any of my comments.

Regards,

Ross.

From: crayford, ross
Sent: 02 August 2019 11:05
To: gunner, hannah <hannah.gunner@medway.gov.uk>
Subject: RE: MC/19/1566 - Land Off Pump Lane, Rainham

Hi Hannah,

Please see below some additional comments to append to those already made on 12th July:

Transport

The submitted Transport Assessment provides a breakdown of the likely traffic generation that will result as part of the development. The report confirms that the proposed development is likely to cause an increase in traffic generation (the scale of which will be considered by the council Transport Planners), which has the potential to impact designated heritage assets, if it is not managed appropriately. Whilst it is noted that additional access points are proposed as part of the development, there is a likelihood that additional traffic is likely to use the existing lanes and roads that pass by or through designated heritage assets, such as the Lower Rainham Conservation Area which already has traffic calming measures in place. It is not fully established from the documentation provided in support of the application what the impact of the additional traffic will have upon the designated heritage assets both visually in terms of the impact upon their significance, and physically in terms of any potential impacts of traffic movements (including those of vehicles during construction of the development) upon the structure of heritage assets that may be susceptible. We therefore request additional assessment to address this matter, including proposed measures for the minimisation of any harm, and any necessary preventative measures for the protection of any heritage assets affected by increased traffic resulting from the development.

Drainage

The submitted Flood Risk Assessment and Drainage Strategy provides a breakdown of potential sources of flooding and a proposed drainage design and mitigation measures that are required. The report confirms that the proposed development is likely to require a need for additional drainage systems. It is noted from the masterplan that attenuation basins are proposed in order to manage surface water run-off, some of which are located in close proximity to designated heritage assets, such as Chapel House. It is not fully established from the documentation provided in support of the application what the impact of the drainage strategy will have upon the designated heritage assets both visually in terms of the impact upon their significance, and physically in terms of any potential impacts of an increased risk of flooding due to the location of attenuation basins and other drainage management facilities proposed to be located nearby. We therefore request additional assessment to address this matter, including proposed measures for the minimisation of any harm, and any necessary preventative measures for the protection of any heritage assets affected by the proposed drainage strategy.

I hope this is of assistance, but let me know if you need any further information on the points raised.

Regards,

Ross.

From: crayford, ross

Sent: 12 July 2019 13:20

To: gunner, hannah <hannah.gunner@medway.gov.uk>

Cc: representations, planning <planning.representations@medway.gov.uk>

Subject: MC/19/1566 - Land Off Pump Lane, Rainham

Hi Hannah,

I've had a look at the above application and have the following comments to make:

The proposed development is located to the north of Rainham and Twydall, between the railway line and the Lower Rainham Road, and lies adjacent to 2 Conservation Areas; Lower Twydall and Lower Rainham. The proposed development has the potential to impact upon 8 Listed Buildings; York Farmhouse (Grade II), Pump Farmhouse (Grade II), Chapel House (Grade II), 497-501 Lower Rainham Road (Grade II), The Old House (Grade II), Bloors Place (Grade II*), a range of outbuildings including cart lodge and granary west of Bloors Place (Grade II), and the garden walls to south and east of Bloors Place (Grade II); as well as a range of non-designated heritage assets. An assessment of the impact of the proposed development must be addressed in terms of both the impact upon individual heritage assets, as well as the impact upon how the heritage assets function collectively as a historic landscape and its established character.

Lower Rainham Conservation Area and the Listed Buildings at Bloors Farm

The Lower Rainham Conservation Area currently comprises a mixed collection of residential properties dating back to the 15th century, a public house (The Three Mariners) and a former farm at Bloors Place; however historically there was a second public house (The Jolly Gardeners) and a chapel. The names of the pubs provides an insight into the history of the area, indicating that the traditional trades in the area related to use of the river and to horticulture. Grade II* Listed Bloors Place is located to the east of the Conservation Area and comprises a former hall house dating back to between 1470-1510, which was converted to a farmhouse by the 18th century. A range of Grade II Listed farm buildings remain including a granary and cart shed, as well as a recently reconstructed oast. The Conservation Area is characterised by that of a traditional Kentish hamlet in its original setting that is derived from the local horticultural industry, and to a lesser extent its association with the river. Historic mapping identifies an abundance of orchards surrounding the Conservation Area on all sides and is described in Edward Hasted's 1798 publication 'The History and Topographical Survey of the County of Kent' as *"this parish has been noted for growing some of the best wheat that this kingdom has produced; and it had will within memory many plantations of cherries and apples, especially on the lands adjoining the high road, and to the northward of it."*

Any development nearby would need to respect the setting of the Lower Rainham Conservation Area and heritage assets contained within. The proposed development masterplan indicates that a school is to be located immediately south of the western half of the Lower Rainham Conservation Area, and residential development to the eastern portion; further residential

development is proposed immediately east of the Conservation Area, to the rear of Chapel House. Due to the application being outline currently (with layout and design as reserved matters), we would be unable to fully assess the impact upon the significance of the Conservation Area; however we have concerns over the indicated locations for development adjacent to the heritage assets noted above, which is likely to encroach upon and interrupt their existing and important historic rural setting.

Pump Farmhouse

Grade II Listed Pump Farmhouse is understood to originate from the 18th century, and has been subject to alteration since. Historic mapping shows the farmhouse to be surrounded on 3 sides by orchards, with a farmyard located to the immediate south. A modern residential development, Russett Farm, has since replaced the farmyard and the orchard to the north-western edge, however the horticultural setting is retained to the north. Whilst the design of Russett Farm has taken influence from traditional Kentish farm buildings, the scale of the development has led to an erosion of the setting of the farmhouse, reducing its interpretation in the historic landscape.

Any development adjacent to Pump Farm (particularly to the north of the farmhouse) will need to respect its setting. The proposed development masterplan indicates a buffer around the farm, with a 'village centre' proposed to the immediate north, in the area of setting most in need of protecting. Due to the application being outline currently, we would be unable to fully assess the impact upon the significance of Pump Farmhouse; however we have concerns over the indicated locations for adjacent development which is likely to encroach upon and interrupt its existing and important historic rural setting.

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Lower Twydall Conservation Area and York Farmhouse

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The Lower Twydall Conservation Area is a small settlement comprising range of historic former farm houses and farm buildings converted to residential use, many of which are now Grade II Listed. The origins of the settlement here can be dated back to the 15th century, with late 19th century mapping identifying the 3 main farms of York Farm, Little London Farm and Twydall Farm, all surrounded by orchards and fields. Much of this historic horticultural setting is still in existence around the Conservation Area and plays a significant role in its character and significance. A small modern residential development (Little York Meadows) has eroded some of this character to the western corner, however similarly to Russett Farm much of the design of the development has taken influence from traditional Kentish farm buildings.

Any development nearby would need to respect the setting of the Lower Twydall Conservation Area and heritage assets contained within. The proposed development masterplan indicates residential development immediately to the south-east of the Conservation Area, separated by what appears to be a belt of trees. Due to the application being outline currently, we would be unable to fully assess the impact upon the significance of the Lower Twydall Conservation Area and York Farmhouse; however we have concerns over the indicated location for adjacent development which is likely to encroach upon and interrupt their existing and important historic rural setting.

The cumulative impact upon heritage assets

Much of the land around Lower Rainham (between the Railway line to the south and River Medway to the north) has been used for horticultural purposes, particularly fruit orchards since at least the 18th century, with evidence of farm buildings being identified at Bloors Farm, which Hasted in 1798 describes as *“the old mansion of Bloor's-place, mentioned hereafter, great part of which was pulled down a few year ago to adapt the size of it to that of a farmhouse, though what still remains of it, with the garden walls, offices, &c. shew it to have been of large size, well suited to the hospitality of those times, and to the rank which the founder of it held among the gentry of the county”*. The 2001 Kent Historic Landscape Characterisation identifies the proposed development site area as part of the ‘Northern Horticultural Belt’. This belt is *“primarily defined by horticultural activity, with a predominance of orchards. This belt occurs on the sandier soils of the northern areas in the sheltered belt below the downland areas. Economically, it is situated between a series of major towns which would have supplied substantial markets as well as an extensive road and rail corridor for transportation further afield.”* The existing fruit orchards and dispersed settlement pattern of farms and associated buildings therefore form a distinctive and important part of the historic landscape of the Lower Rainham area and help characterise many of the heritage assets and their settings.

The proposed development includes the loss of some of the historic orchards described above and would lead to the eventual coalescence of 3 individual historic settlements that collectively with the orchards and fields between define the historic landscape in this area. Whilst the harm to the heritage assets is considered to be less than substantial, paragraph 194 of the NPPF requires clear and convincing justification for any harm or loss of significance to a heritage asset. Furthermore, paragraph 197 notes 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. 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), as per paragraph 193.

Limited justification for the harm to the significance of the heritage assets has been provided through the application, with little discussion around the coalescence of the historic settlements and the alteration to the historic landscape that contributes to the significance of many of the affected heritage assets; we therefore object to the application in its current form.

Due to the proximity of the proposed development to a Grade II* Listed Building it may be worthwhile consulting Historic England; and due to the potential for archaeology in the area we would also suggest that the county Archaeologist is consulted too, if this has not been done already.

I hope this is of assistance, but let me know if you need any further information on the points discussed above.

Regards,

Ross.

Ross Crayford | Conservation Officer | Medway Council
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