LAND OFF PUMP LANE, RAINHAM, KENT HERITAGE SUMMARY GAIL STOTEN

- 1. My name is Gail Stoten. I am an Executive Director at Pegasus Planning Group. I am a Member of the Chartered Institute for Archaeologists (MCIfA). I have been elected a Fellow of the Society of Antiquaries of London. I have a First Class Honours degree in Archaeology and I have been a heritage professional for 20 years. I am a Trustee of Painswick Rococo Gardens.
- 2. A full assessment of the heritage significance and setting of the assets mentioned in the Reason for Refusal has been completed and in addition, where the Council has subsequently expanded their case, consideration of other elements has been made.
- 3. With regards to the Grade II Listed York Farmhouse, this former farmhouse has now been converted to three residences, and the remainder of the farm buildings residentially converted also. In addition. Two large residences have been constructed to the south-east of the asset and, as such, the asset is not only surrounded by the gardens of the residences within it, but also further surrounded by the gardens of the new-build houses. This has physically separated the asset form the wider landscape, and the cessation of the complex for farming uses has severed the functional association. The site has only minimal intervisibilty with the upper elements of the asset. The proposed development will be set back from the asset, beyond its gardens, further gardens, a strongly vegetated boundary and public open space. No harm to the heritage significance of York Farmhouse through changes in setting is anticipated.
- 4. The Grade II Listed Pump Farmhouse is also now used for solely residential rather than agricultural purposes, and its surroundings have likewise undergone a large degree of change. Twenty four modern residences have been constructed to the north and west of the former farmhouse, and separate residence lies to the south. The access route to a depot now lies to the east of the farmhouse. The modern orchard within the site makes a minor contribution to the heritage significance of the asset through setting, through historic illustrative interest, although this contribution is minor as the functional association has been severed, the modern houses screen views to much of the land that was historically associated, and the land that is most visible from the building to the east was mostly not historically

associated with the asset. The proposed development will be visible in views east from the asset, from its side elevation, although it will be set back behind open space and orchard. The proposed development will not harm the fabric of the asset, from where it derives most of its significance, or the gardens of the asset, from where it is best appreciated. The proposed development will result in less than substantial harm at the low end of the spectrum for this asset.

- 5. With regards to the Grade II Listed Chapel House, again the functional association with the wider landscape has been severed, and the building is now two private residences. These residences face directly onto Pump Lane, from where the asset can be best appreciated, and the asset has gardens or other curtilage on other sides. It has filtered intervisibility with the site from the rear and sides of the structure. The site makes a minor contribution to the heritage significance of the asset through setting, but this is only minor as the functional association has been severed, the intervisibility is filtered, and the building was clearly designed to face in the other direction onto Pump Lane. Development will be set back from the rear of the asset. The fabric of the structure, from where it gains most significance, will not be harmed, nor will the gardens it lies within or its relationship with Pump Lane. The change of character of the site from modern orchard to development beyond orchard will result in less than substantial harm at the low end of the spectrum to this asset.
- 6. The Bloors Place complex, the residence of which is Grade II* Listed, has been subdivided in the later 20th or 21st century, with the Wagon House, Cartlodge and Oast now separate residences and a roofing company operating from the complex too. The house has also been functionally severed from much of its former landholding. This landholding was a large and of a dispersed nature, historically encompassing several landuses and functions. The house lies within its gardens, some of which are surrounded by high walls, and give the house and its immediate curtilage a secluded immediate setting. The site encompasses part of the former landholding, albeit of changed character to modern commercial orchard, and now with limited seasonal intervisibility. The proposed development will be set back from Bloors Place, beyond its gardens enclosed by high walls, and orchard beyond, outside the site. It is anticipated to cause less than substantial harm at the lowermost end of the spectrum to Bloor place. No harm is anticipated to the Grade II listed outbuildings, which now include separate residences, or the Grade II Listed walls enclosing the gardens.

- 7. With regards to the non-designated oast house south of Bloors Place, this has also been residentially converted and no longer has a functional association with the wider landscape. The elements of its setting that make the greatest contribution to its significance through setting are its immediate curtilage from where its architectural interest can best be appreciated, and the other building of the former Bloors Place complex, which have historic illustrative value as to its origins. Any harm to the heritage significance of the asset will be very minor at most.
- 8. The historic development of the Lower Twydall Conservation Area has been considered, and how the large degree of change to the function of the buildings has affected the relationship of the buildings and spaces within it and the wider landscape. Whilst many of the buildings of heritage significance had agricultural origins, these have all been residentially converted, with no remaining active farm complexes remaining, and the historic buildings are now separated from the wider landscape by domestic gardens, sometimes forming a double layer. There is no ready access between the site and the Conservation Area. The site has only glimpsed visibility with some elements of buildings within the Conservation Area and their plots, albeit these are largely of changed character from their historic uses, with the site lying beyond garden plots of modern origin. The residential development within the site will be set back from the edge of the Conservation Area. Only less than substantial harm at the lowermost end of the spectrum is anticipated for this asset.
- The historic development of the buildings and spaces in the Lower Rainham 9. Conservation Area has also been considered. The functional relationship with the wider agricultural land has largely been severed. Of the few agricultural larger complexes that were present historically, Bloors Place has been subdivided by residential conversion and no longer has a functional association with the wider area, and a couple of the other smaller complexes have had the agricultural buildings present demolished. The settlement appears to have been sited to take advantage of a wider economic base that could be exploited in this locality, with the largest historic landholding of Bloors Place including a wharf, saltmarsh, woodland, meadow, orchard and arable in the mid 19th century. The Conservation Area has a stronger visual link with the Medway and adjacent land than land to the south-west, which it is largely screened from by strongly-vegetated boundaries. As discussed above, the proposed development will have some intervisibility with Chapel House and Bloors Place which lie in the Conservation Area, but will be largely screened from historic buildings in the core which front

onto Lower Rainham Road. The experience of the Conservation Area from Lower Rainham Road will be largely unchanged. The change to some of the wider agricultural surrounds of the area is anticipated to result in less than substantial harm at the lowermost end of the spectrum to the Lower Rainham Conservation Area, and its character and appearance will be preserved.

- 10. It is agreed common ground that there will be no harm to the heritage significance of 497-501 Lower Rainham Road and The Old House.
- 11. With regards to the identification of the land within the site as a 'historic landscape' which is itself a heritage asset, I do not concur with this. The landscape is not of sufficient intrinsic heritage interest for it to be considered as such. The landscape has undergone a large degree of change, from a greater range of landuses to predominantly orchard, and the orchard itself has changed in character, now having a modern commercial character. I have considered the landscape as part of the setting of the assets mentioned above, where appropriate. Likewise, I do not consider that Pump Lane or the Bridleway which runs through the site have sufficient interest to be considered as heritage assets.
- 12. With regards to the cumulative harm identified by the council, I do not consider that it is appropriate to inflate levels of harm to assets, where harm applies to multiple assets, and the approach adopted by the council to do so has no basis in guidance or policy.
- 13. With regards to the modest harm to the heritage assets identified above, this does not preclude development, but rather should be weighed against the public benefits of the proposed scheme. This exercise is carried out by Mr Duncan Parr in his proof of evidence. Likewise, Mr Parr considers the very minor harm to the non-designated Oast House, under paragraph 197 of the NPPF.