

**Pump Farm & Bloor Farm, Lower Rainham, Kent :
Heritage Review – September 2019**

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Introduction

- 1 This report aims to review the outline planning application for the redevelopment of a site at Pump Farm/Bloor Farm, Lower Rainham with regard to Built Heritage and specifically consider the comments made by Kent Council, Historic England and the Local Planning Authority.
- 2 The report has been prepared by Nick Collins BSc (Hons) MSc MRICS IHBC. Nick has twenty years' experience in the property sector, including most recently as a Director of the Conservation Team at integrated design consultants, Alan Baxter & Associates. Nick spent nine years at Historic England as a Principal Inspector of Historic Buildings & Areas where he led a specialist team of historic building inspectors, architects, and archaeologists on a wide range of heritage projects in East & South London. Previously Conservation Officer at the London Borough of Bromley, Nick began his career at international real estate consultancy Jones Lang LaSalle as a Chartered Surveyor. This experience has given Nick an in-depth understanding of the property industry, listed building and planning process, heritage policy and guidance and funding bodies

The application

- 3 The site lies to the east of Gillingham and Chatham, and north west of Rainham, immediately south of Lower Rainham Road between the built-up area to the south and the Riverside Country Park and River Medway Estuary to the north.
- 4 The proposals comprise a residential-led mixed use development of up to 1,250 residential dwellings; 1000 sqm Local Centre; 60 bed Extra Care Apartments and facilities; 80 bed care home; 2 form entry Primary School; and road with landscape infrastructure.
- 5 The site comprises c.51.2 ha of agricultural land laid to orchard. The site is bounded by Lower Rainham Road to the north, Lower Bloors Lane to the south and the London to Margate rail line to the south. To the north west are open fields leading to Lower Twydall Lane.
- 6 The site is bisected north to south by Pump Lane and the eastern half of the site is bisected by the Public Bridleway. Immediately adjacent to the southern point there is an area of allotments. The village of Lower Rainham abuts the site to the north east along Lower Rainham Road. There is sporadic development between the rail lines and Lower Rainham Road.

Heritage Context

- 7 As part of the application a Heritage Setting Assessment¹ has been produced and this appended to this report.
- 8 This report has identified that there are a total of five designated heritage assets within close proximity of the site. These comprise a number of statutory listed buildings and Conservation Areas:
- Chapel House, 1 & 2 Pump Lane – Grade II
 - Pump Farmhouse, Pump Lane – Grade II
 - Bloors Place, Lower Rainham Road – Grade II* (which includes: range of outbuildings including cart lodge and granary west of Bloors Place, Lower Rainham Road and Garden walls to south and east of Bloors Place, Lower Rainham Road).
 - Lower Rainham Conservation Area
 - Lower Twydall Conservation Area
- 9 In addition, there are a number of Grade II listed buildings in and around the Lower Twydall Conservation Area. These include:
- York Farmhouse – Grade II
 - Little London Farmhouse – Grade II
 - Manor Barn and North & West Walls – Grade II
 - Twydall Barn & Walls – Grade II
 - Manor House & attached Garden Wall – Grade II

Heritage significance

- 10 The nearby listed buildings and the two Conservation Area are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). The unlisted buildings within the conservation area, that contribute to its heritage significance are ‘undesigned heritage assets’.

¹ Rapleys, (May 2019) Environmental Statement Technical Appendix 14.3: Heritage Setting Assessment Land at Pump Lane

- 11 'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'. The Historic England 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 12 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (Historic England, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.
- 13 Historic England have provided guidance in relation to setting in 'The Setting of Heritage Assets'.
- 14 The Council have not prepared Conservation Area Appraisals for the conservation areas that identifies their character and appearance, and therefore their significance. However, it is clear that both conservation areas reflect small historic settlements.
- 15 In the case of Lower Rainham the Council have identified that this takes in a loose cluster of buildings of varying dates along Lower Rainham Road centred around Chapel House and Bloors Place. Whilst the agricultural/horticultural land around Lower Rainham helps define this as a distinct settlement from the more built up areas of Rainham and Twydall there is, nevertheless ribbon development along Pump Lane to the south and the conservation area itself includes a number of modern residential in-fill dwellings.
- 16 Approaching the conservation area from the east, the proposed site is largely hidden by dense planting – hedges, mature shrubs and mature trees. The land views are more open to the north. This is the same when approaching from the west. A high hedge on the southern side of the road and open views to the north means that the eye is drawn to the north and the site, to the south, is both physically and visually screened.
- 17 Lower Twydall Conservation Area is also described as a conservation area made up of a range of buildings of different styles and dates, but that the overall impression is one of a small settlement of agricultural origins. It is recognised that the historical character and therefore setting of the conservation area includes the agricultural land surrounding the settlement.
- 18 Even more so than Lower Rainham Conservation Area, there is a strong sense of enclosure from the public realm and particularly Lower Twydall Lane, which is a very narrow lane with tall hedges and planting on both sides. The lane only opens out at the point of houses or agricultural buildings and these are all viewed with

further planting to their rear – thus giving very little sense of any open expanse of agricultural or horticultural land behind.

- 19 This is also the case for the listed buildings that lie within the Lower Twydall Conservation Area. The closest to the proposals site is York Farmhouse, which is located close to Lower Twydall Lane and has a large garden with dense planting along its eastern boundary.
- 20 Whilst the character of these conservation areas includes the ‘sense’ of rural isolation, it is clear that this is a perception rather than a reality from the public realm.
- 21 Of the listed buildings near to the proposal site, Pump Farm is located in one of the most sensitive position – at the heart of the proposed new development.
- 22 Its setting is identified in the Rapley’s report. It is situated towards the rear of a relatively large land parcel which includes surrounding mature vegetation and a garage at the rear. The Farmhouse is set back from Pump Lane itself and is almost completely surrounded by a recent residential development at Russett Farm. Although once the farm may have sat with views across open countryside, in reality this element of the building’s setting and therefore its contribution to the building’s significance was much reduced some years ago.
- 23 Chapel House, 1&2 Pump Lane is located close to the junction of Pump Lane and Lower Rainham Road. The house is a ‘village house’ rather than an agricultural building, and thus its setting as part of a collection of buildings rather than in a position of isolation is most relevant.
- 24 In the Rapley’s report, the building’s setting is described as characterised by roadside linear development with a garden area at the rear. The primary view of Chapel House comes from Pump Lane and on approach from the south-east on Lower Rainham Road.
- 25 Bloors Place and outbuildings are located on the southern side of Lower Rainham Road. This complex has agricultural origins and its significance and its architectural and historical interest has been identified in the Rapley’s report. Its connection to its agricultural surroundings does form part of its historical significance, but in reality its setting is now characterised by the physical features of the land parcel itself as a self-contained group of buildings with unlisted buildings and mature vegetation contributing to this. It is not readily visible from the public highway.
- 26 The setting of the listed buildings that also form part of Lower Twydall Conservation Area are, in the context of this application, very similar to that of the conservation area.

- 27 Overall, whilst the setting of many of the heritage assets in the vicinity of the proposal have historical association with an agricultural past, in reality all of them are now surrounded by mature and often dense planting and thus it is a perceived rather than actual connection with any remaining rural surroundings that is important to their setting. This does not mean that views out and beyond – or from outside, towards the heritage assets – are not possible, but any proposals in the vicinity of these assets should be considered in this context.

The legal and policy context

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 28 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers 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' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

- 29 The Revised National Planning Policy Framework was published in February 2019.
- 30 Paragraph 124 of the NPPF says that 'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.
- 31 Paragraph 127 says that developments should be:
- "Visually attractive as a result of good architecture, layout and appropriate and effective landscaping". It goes on to say that developments should be "sympathetic 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). The paragraph continues that developments should "establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit".
- 32 The NPPF says at Paragraph 189 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. The level of detail should be proportionate to the assets' importance and

no more than is sufficient to understand the potential impact of the proposal on their significance.

33 A description and analysis of the heritage and townscape significance of the site and its context is provided in this report.

34 At Paragraph 192, the NPPF says that:

In determining planning applications, 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.

35 Paragraph 193 advises local planning authorities 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). The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting’.

36 Paragraph 195 says:

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

37 Paragraph 196 says 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 securing its optimum viable use.

The Proposals

- 38 The proposals have been developed with a clear understanding and appreciation of the heritage context of the site. They provide an outline landscape approach that the Council will be able to condition as the proposal progresses and thus can be presumed to be achievable.
- 39 The sense of separation that forms part of Lower Rainham Conservation Area's character is, in reality, perceived from the open views to the north – it can only be 'presumed' to the south due to the existing dense screening. This openness will not be affected by the proposals and the sense of separation will be retained.
- 40 Further, the proposals locate uses that will have the least density of urban form closest to the southern boundary of the conservation area, including the land allocated for the school – a use which compliments the historic settlement status of Lower Rainham.
- 41 With regards the listed buildings that sit within this conservation area; Chapel House 1&2 Pump Lane, and Bloors Place, as described earlier their setting already comprises considerable mature vegetation within and along their boundaries and in the case of Chapel House it is predominantly a 'village building'. The proposed residential development sits well back to the south of Bloors Place with also a small landscaped pond and 'buffer' between the two.
- 42 If new development is visible from the site it will be 'glimpsed' across a field rather than immediate – which is likely to be the case now anyway with the ribbon development along Lower Bloors Lane.
- 43 In terms of the Lower Twydall Conservation Area, it is very unlikely that there will be any visual impact at all on the setting of the conservation area from the public realm. As has been described, from the public highway the conservation area is typified by the narrow high-hedged Lower Twydall Lane and where views do open up – at the point of buildings on either side of the lane – the mature planting surrounding these buildings means that views beyond are largely not possible and particularly at the point where the proposed development comes closest to the conservation area at its south eastern corner.
- 44 The relationship between the conservation area and its agricultural setting will remain. Only a very small element of the proposal will come close to the south eastern border of the conservation area – at a point where the railway line has already altered the open character of the area with open land to the north east remaining. As described earlier, the existing mature vegetation already provides a separation between the existing buildings and the agricultural land that surrounds the area – allowing only glimpsed views – and thus the proposed additional landscaping along with the soakaway basins will provide a genuine visual buffer

while still allowing views across open land for the majority of the eastern boundary of the conservation area. This will mitigate the small loss of openness to the south east corner of the conservation area.

- 45 Whilst geographically it would appear that Pump Farm would be the heritage asset most affected by the proposal, in reality it is already surrounded by development to its north, east and south and there is development along Pump Lane to its west – therefore any open outlook is already limited. There is also much mature vegetation that forms part of its boundary and surrounds the site.
- 46 The proposals envisage a wide belt of land that will contain further planting that will act as a further ‘buffer’ to the complex and thus while glimpses of newly built development might be possible it is well mitigated and is in keeping with the existing setting and context of the building.
- 47 Overall, the proposals have had careful regard for the sensitivity of the surrounding heritage assets and an assessment of the reality of the asset’s settings has demonstrated that there is a considerable difference between how they may appear on plan and the reality on the ground.
- 48 It is recognised that an agricultural context forms part of the historical significance of many of the heritage assets, however as described above, this is more often perceived rather than reality. The proposals aim to ensure that this sense of separation is retained.
- 49 Although the setting of each conservation area will be altered (Lower Rainham to a greater extent), the character and appearance of each conservation area would be preserved by the proposals and their self-contained nature should not be adversely affected. The proposals site is already barely visible due to the extent of existing mature vegetation and this will be further augmented by the proposals through a series of buffer zones, ponds and planting.
- 50 Similarly, the setting of the listed buildings would not be harmed by the proposals. The majority already have an enclosed character through existing planting and in the case of Chapel House is a semi-urban building already – an important element of the Lower Rainham Conservation Area. The proposals intend to provide a deep buffer that is properly planted to further mitigate against any impact of the development and ensure the sense of separation is retained. This would also mitigate against any perceived loss of historical association between the assets and a rural context.

Compliance with policy and guidance

- 51 This report when read alongside the previously submitted documentation – in particular the Rapleys Heritage Setting Assessment and the Design and Access Statement - has provided a description and analysis of the site and its heritage context, as required by the National Planning Policy Framework. In addition, the report also describes how the proposed outline scheme will affect that heritage significance. We believe that the outline proposals will, on balance, enable the preservation of the setting of the conservation areas and listed buildings, and for that reason, the scheme complies with policy and guidance.
- 52 By preserving and enhancing the character and appearance of the conservation area and its setting, as well as that of the listed buildings the proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 53 In respect of Paragraph 192 of the NPPF, the proposed scheme can be described as ‘making a positive contribution to local character and distinctiveness’ through ensuring a carefully conceived masterplan for the site.
- 54 The proposed scheme complies with Paragraph 195 of the NPPF - it certainly does not lead to ‘substantial harm to or total loss of significance of a designated heritage asset’. It also complies with Paragraph 196 for the reasons given earlier in this report - the setting of the heritage assets has been fully investigated and where necessary mitigation measures through enhanced landscaping and buffer zones has been included in the proposals which will further ensure that each asset retains its significance. Even if it is thought that some less-than-substantial harm is caused to some of the heritage assets through change to their setting this must be balanced by the decision maker against the considerable public benefits that the proposals will deliver.
- 55 Overall, we believe that the effect of the proposals on any nearby heritage significance described earlier has been carefully considered and where necessary mitigation measures put in place to ensure that their significance and setting is preserved. For the reasons given above, the scheme complies with the law, national and local policy and guidance for conservation areas and listed buildings.

Appendix A – Rapleys Heritage Setting Assessment, May 2019

Rapleys (May 2019) Environmental Statement Technical Appendix 14.3: Heritage Setting Assessment; Land at Pump Lane, Lower Rainham (separately attached)

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