



Heritage Statement in Advance of the
Proposed Development at Elm Lodge,
Tenterden Road, Appledore, Ashford,
TN26 2AL.

November 2019

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National Grid Reference TQ 95416 29917



Report for Mr Matthew Parsler

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SWAT ARCHAEOLOGY

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Built Heritage Statement in Advance of the proposed development at Elm Lodge, Tenterden Road, Appledore, Ashford, TN26 2AL

Summary

SWAT Archaeology has been commissioned by Mr Matthew Parsler to prepare a Built Heritage statement relating to the proposed development area (PDA) at Elm Lodge, Tenterden Road, Appledore, Ashford, TN26 2AL.

There is a requirement under the National Planning Policy Framework (NPPF) for the client to explain the significance of any particular designated heritage assets that have been identified in the vicinity of the study site and demonstrate any potential impacts that a proposal will have upon their significance.

This report has demonstrated that adjacent to the PDA lies the Grade II designated heritage asset of Walnut Tree Farmhouse. The PDA is also circa 80m north to the northern edge of the Appledore village Conservation Area. The other designated assets in the assessment area have no intervisibility and are not impacted by the proposed development

This statement demonstrates that the significance of Walnut Tree Farmhouse resides in its historical and aesthetic interest, which will not be affected by the proposed development. The farmhouse no longer has any direct relationship with the land of the PDA and the proposed development will not impact upon the historic and aesthetic fabric of this building. Consequently, the proposed development does not affect its significance. Walnut Tree Farmhouse and also the Conservation Area have extremely little or no intervisibility with the PDA either as the result of vegetation or other residential development and therefore will not impact upon their setting.

This heritage statement has found that the designated heritage assets will remain unaffected by the proposed development and that the proposed development will produce no harm on the setting or significance of these assets.

The proposed development for new residential housing is small in scale and will offer public benefits and will outweigh any 'less than substantial' impact to Walnut Tree Farmhouse and the Conservation Area and outweigh any potential harm done.

1 INTRODUCTION

1.1 Project Background

- 1.1.1 Swale & Thames Survey Company (SWAT) was commissioned by Mr Matthew Parsler (the 'Client'), to carry out a Built Heritage Statement relating to the proposed development area (PDA) at Elm Lodge, Tenterden Road, Appledore, Ashford, TN26 2AL centred on National Grid Reference (NGR) TQ 95416 29917 (Fig 2).
- 1.1.2 This document will be used in support of a planning application associated with the proposed development.

1.2 Site Description

- 1.2.1 The PDA is part of the land associated with Elm Lodge on the southern side of Tenterden Road in Appledore Kent. Appledore is a village situated on the northern edge of the Romney Marsh, circa 12 miles south-west of the town of Ashford. The plot is just over 2 acres in size. The land around Elm Lodge outside of the garden area is currently as pasture for horses. To the east is the Grade II listed Walnut Farmhouse at the south west side of the junction of Tenterden Road with The Street. The Street being the main road through Appledore, where this junction is located at the northern end of the village. To the south is the new small residential development of five new houses on land that was known as Magpie Farm. To the west is a triangular area of hardstanding aside a larger arable field. The PDA lies on broadly level ground at an average height of 7m aOD, although this drops to circa 6m aOD at the far western boundary.
- 1.2.2 Appledore has around 32 designated assets within the village, with the majority located along the southern end of The Street close to the parish church and the historical core of the village. Most of which have no impact or intervisibility with the PDA. However, there is one designated asset immediately east of the PDA being Walnut Tree Farmhouse. Therefore, this asset is covered in greater detail within this report. In addition, there is the Appledore Conservation area to the south of the PDA of which the northern boundary lies circa 80m south, in which many of the heritage assets in the wider assessment area are located (Fig. 12).

1.3 Project Constraints

- 1.3.1 No constraints were associated with this project.

1.4 Scope of Document

- 1.4.1 This assessment was requested by the Client in order to determine, as far as is possible, the nature, extent and significance of the development affecting the settings of designated heritage assets. The assessment forms part of the National Planning Policy Framework (NPPF) requirement and is intended to inform and assist with decisions regarding heritage assets and is to be used in the support of planning applications associated with the proposed development.

- 1.4.2 This heritage asset study has been produced in line with archaeological standards, as defined by the Chartered Institute for Archaeologists (2014, revised 2017). A desktop, or desk-based assessment, is defined as being:

‘Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of CIfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.’

- 1.4.3 The purpose of the Heritage Asset report is, therefore, an assessment that provides a contextual archaeological record, in order to provide:

- *an assessment of the potential for heritage assets to survive within the area of study*
- *an assessment of the significance of the known or predicted heritage assets considering, in England, their archaeological, historic, architectural and artistic interests*

- *strategies for further evaluation whether or not intrusive, where the nature, extent or significance of the resource is not sufficiently well defined*
- *an assessment of the impact of proposed development or other land use changes on the significance of the heritage assets and their settings*
- *strategies to conserve the significance of heritage assets, and their settings*
- *design strategies to ensure new development makes a positive contribution to the character and local distinctiveness of the historic environment and local place-shaping*

CIFA (2017:4)

2 PLANNING BACKGROUND

2.1 Introduction

2.1.1 National legislation and guidance relating to the protection of, and proposed development on or near, important archaeological sites or historical buildings within planning regulations is defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system.

2.1.2 The National Planning Policy Framework (NPPF), was updated in July 2018, revised in February 2019 and is the principal document which sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework in which Local Planning Authorities can produce their own distinctive Local Plans to reflect the needs own their communities.

2.2 National Planning Policy Framework (NPPF)

2.2.1 The Historic Environment, as defined in the National Planning Policy Framework (NPPF 2019): Annex 2, comprises:

'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human

activity, whether visible, buried or submerged, and landscaped and planted or managed flora.'

2.2.2 NPPF Annex 2 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. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).'

2.2.3 NPPF Section 16: Conserving and enhancing the historic environment sets out the principal national guidance on the importance, management and safeguarding of heritage assets within the planning process. The aim of NPPF Section 16 is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

2.2.4 Paragraph 185 of the NPPF states that:

'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. The planning authorities should take into account:

- 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.'*

2.2.5 Paragraph 189 of the NPPF states 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. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

2.2.6 Paragraph 190 of the NPPF states that:

'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account to the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'

2.2.7 The NPPF, Section 16, therefore provides the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. It is noted within this, that heritage assets should be conserved in a manner appropriate to their significance.

2.2.8 The NPPF further provides definitions of terms which relate to the historic environment in order to clarify the policy guidance given. For the purposes of this report, the following are important to note:

- **Significance.** The value of a heritage asset to this and future generations because of its heritage interest. This 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.

- **Setting.** 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.

2.2.9 The NPPF advises local authorities to take into account the following points in paragraph 192 when drawing up strategies for the conservation and enjoyment of the historic environment;

a) The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;

c) The desirability of new development in making a positive contribution to local character and distinctiveness.

2.2.10 Paragraphs 193 and 198 consider the impact of a proposed development upon the significance of a heritage asset.

2.2.11 Paragraph 193 emphasises that when a new development is proposed, great weight should be given to the asset's conservation (and that the more important the asset, the greater this 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.

2.2.12 Paragraph 194 notes 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. Substantial harm to or loss of:

a) Grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

2.2.13 Paragraph 195 states that where a proposed development will lead to substantial harm (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:

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

2.2.14 Conversely, paragraph 196 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, including securing its optimum viable use.

2.2.15 The NPPF comments in paragraph 201, that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

- 2.2.16 Paragraph 198 states that LPAs should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 2.2.17 Paragraph 200 encourages LPAs to look for new development opportunities within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 2.2.18 Any LPA based on paragraph 202, should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

2.3 Designated Heritage Assets

- 2.3.1 Designated heritage assets are defined in NPPF Annex 2 as:

'World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas designated under the relevant legislation.'

- 2.3.2 Designation is a formal acknowledgement of a building, monument or site's significance, intended to make sure that the character of the asset in question is protected through the planning system and to enable it to be passed on to future generations.
- 2.3.3 Statutory protection is provided to certain classes of designated heritage assets under the following legislation:
- Planning (Listed Buildings and Conservation Areas) Act 1990;
 - Ancient Monuments and Archaeological Areas Act 1979; and
 - Protection of Wrecks Act 1973
- 2.3.4 There are a number of criteria to address and they include the impact of the proposed development on the significance of the Heritage Assets.

Heritage Assets

2.3.5 Any Heritage Asset that includes a World Heritage Site, Scheduled Monument, Listed Building, Wreck, Registered Park or Garden, Conservation Area or Landscape can be identified as having a degree of significance meriting consideration in planning decisions. Heritage Assets are the valued components of the historic environment and will include designated Heritage Assets as well as assets identified by the Local Planning Authority during the process of decision making or through the plan making process.

Setting

2.3.6 The surroundings in which a Heritage Asset is experienced is of importance. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make take several guises; a positive or negative contribution to the significance of an asset, the ability to appreciate that significance or it may have a neutral effect with no changes observed.

Significance

2.3.7 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. Significance may be informed by a number of factors which may include; assessment of the significance of the site, setting and building, where relevant, under a number of headings:

- Historic significance – the age and history of the asset, its development over time, the strength of its tie to a particular architectural period, the layout of a site, the plan form of a building and internal features of special character including chimneystacks and fireplaces.
- Cultural significance – the role a site plays in an historic setting, village, town or landscape context, the use of a building perhaps tied to a local industry or agriculture and social connections of an original architect or owner.
- Aesthetic/architectural significance – the visual qualities and characteristics of the asset (settlement site or building), long views,

legibility of building form, character of elevations, roofscape, materials and fabric special features of interest.

- Archaeological significance – evolution of the asset, phases of development over different periods, important features, evidence in building fabric and potential for below ground remains.

2.4 Planning Policy Guidance

Planning Policy Guidance that help to preserve the built and archaeological heritage are:

Conservation Principles, Policy and Guidance (Historic England, 2008)

- 2.4.1 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment. The Conservation Principles, Policies and Guidance are primarily intended to help us to ensure consistency of approach in carrying out our role as the Government’s statutory advisor on the historic environment in England. Specifically, they make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process.
- 2.4.2 The document explains its relationship to other policy documents in existence at that time, including Planning Policy Statement 1: Delivering Sustainable Development (2005), which includes the explicit objective of ‘protecting and enhancing the natural and historic environment’ In this document, Heritage England provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance note (PPG) 15 Planning and the Historic Environment (1994) and PPG16 Archaeology and Planning (1990) those general principles which are applicable to the historic environment as a whole.
- 2.4.3 The policy document provides details about a range of Heritage Values, which enable the significance of assets to be established systematically, with the four main 'heritage values' being:
- Evidential value. This derives from the potential of a place to yield evidence about past human activity. Physical remains of past human

activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them especially in the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past.

- **Historical Value.** This derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. Association with a notable family, person, event, or movement gives historical value a particular resonance.
- **Aesthetic value.** This derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.
- **Communal value.** This derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values but tend to have additional and specific aspects. These can be commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it or have emotional links to it. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place.

Historic Environment Good Practice in Planning Notes

- 2.4.4 In March 2015, Heritage England produced three Good Practice Advice in Planning (GPA) notes. The notes provided information on good practice to assist local

authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). GPA1 covered 'The Historic Environment in Local Plans'. GPA2 provided advice on 'Managing Significance in Decision-Taking in the Historic Environment' and GPA3 covered 'The Setting of Heritage Assets'. As at March 2017, GPA4 entitled 'Enabling Development and Heritage Assets' was still in draft.

GPA2: Managing Significance in Decision-Taking in the Historic Environment.

2.4.5 The guidance focuses on understanding the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. The document sets out a number of stages to follow:

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

2.4.6 Since heritage assets may be affected by direct physical change or by change in their setting. It is important to be able properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process to assist with any planning decision-making in line with legal requirements.

GPA3: The Setting of Heritage Assets.

- 2.4.7 This document emphasises that the information required in support of applications for planning permission and listed building consents 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.
- 2.4.8 The NPPF makes it clear that the setting of a heritage asset is 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.
- 2.4.9 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, including a variety of views of, across, or including that asset, and views of the surroundings from or through the asset, and may intersect with, and incorporate the settings of numerous heritage assets.
- 2.4.10 It covers areas such as cumulative change, where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Change over time and understanding any history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset.
- 2.4.11 The implications of development affecting the setting of heritage assets to be considered on a case-by-case basis and since conservation decisions are based on the nature, extent and level of a heritage asset's significance, Historic England recommends the following broad approach to assessment, undertaken as a series of steps:
- Step 1: Identify which heritage assets and their settings are affected.

- Step 2: Assess whether, how and to what degree these settings contribute to the significance of the heritage asset(s).
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance.
- Step 4: Explore the way to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

2.4.12 The guidance reiterates the NPPF in stating that where developments affecting the setting results in ‘substantial’ harm to significance, this harm can only be justified if the developments delivers substantial public benefit and that there is no other alternative (i.e. redesign or relocation).

2.4.13 Historic England has also published three core Advice Notes, which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; ‘Historic England Advice Note 1: Understanding Place: Conservation Area Designation, Appraisal and Management’ (25th February 2016), ‘Historic England Advice Note 2: Making Changes to Heritage Assets’ (25th February 2016) and ‘Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans’ (30th October 2015).

2.4.14 In October 2019, Historic England released Advice No 12 on Statements of Heritage Significance: Analysing Significance in Heritage Assets. It advocates exploring a stage approach to decision-making in understanding the significance of heritage assets in advance of developing proposals for their buildings and sites as well as exploring a stage approach to decision-making:

1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits
2. Understand the significance of the asset(s)
3. Understand the impact of the proposal on that significance
4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF
5. Look for opportunities to better reveal of enhance significance.

2.5 Local Policies

2.5.1 The Ashford Borough Council Local Plan to 2030 was adopted in February 2019. In addition, Ashford Borough Council also has a Heritage Strategy dated October 2017 relating to the heritage assets of the Borough. There are three policies in the new Local Plan that address the protection and enhancement of the heritage assets of the borough. Policy ENV13 Conservation and Enhancement of Heritage Assets, ENV14 Conservation Areas and ENV15 Archaeology. As the PDA is not close to a Conservation Area, only ENV13 and ENV15 are expanded upon below. In addition, the Local Plan also has a specific site policy, S7 relating to the PDA. These are each covered below.

POLICY ENV13: Conservation and Enhancement of Heritage Assets.

2.5.2 Proposals which protect, conserve and enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged. Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset. All applications which will affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.

POLICY ENV15: Archaeology

2.5.3 The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such designated heritage assets will be assessed in line with Policy ENV13.

- 2.5.4 In addition, where the assessment outlined in Policy ENV13 reveals that important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications.
- 2.5.5 Where the case for development affecting a site of archaeological interest is accepted, any archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative dependent upon their significance. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the Borough Council in advance of development commencing.

3 METHODOLOGY

3.1 Sources

- 3.1.1 A number of publicly accessible sources were consulted prior to the preparation of this document.

Archaeological databases

- 3.1.2 Although it is recognised that national databases are an appropriate resource for this particular type of assessment, the local Historic Environmental Record held at Kent County Council (KHER) contains sufficient data to provide an accurate insight into catalogued sites and finds within both the proposed development area and the surrounding landscape.
- 3.1.3 The National Heritage List for England (NHLE), which is the only official and up to date database of all nationally designated heritage assets and is the preferred archive for a comprehensive HER search.

Cartographic and Pictorial Documents

- 3.1.4 A full map regression exercise has been incorporated within this assessment. Research was carried out using resources offered by the Kent County Council, the internet, Ordnance Survey and the Kent Archaeological Society. A full listing of

bibliographic and cartographic documents used in this study is provided in Section 9.

Aerial photographs

3.1.5 The study of the collection of aerial photographs held by Google Earth was undertaken (Plates 2-6).

Secondary and Statutory Resources

3.1.6 Secondary and statutory sources, such as regional and periodic archaeological studies, archaeological reports associated with development control, landscape studies, dissertations and research frameworks are considered appropriate to this type of study and have been included within this assessment.

Walkover Survey

3.1.7 The Site is visited for a walkover survey. This is for the purpose of:

- Identifying any historic landscape features not shown on maps.
- Conducting a rapid survey for Heritage Assets.
- Understanding the Heritage assets' setting.

4 ARCHAEOLOGICAL AND HISTORICAL DEVELOPMENT

4.1 Introduction

4.1.1 Appledore, a small village lies on the northern edge of Romney Marsh, 12 miles from Ashford. Located on the River Rother, which until it silted up in the Medieval period onwards, the village was originally a port and as well as fisheries included industries such as ship building. The earliest known human activity found in the wider Romney Marsh area is around 2000 BC, although the area was not heavily populated and little evidence is found of activity in the Bronze and Iron ages. Roman activity has been found in nearby Stone in Oxney, to the south west of Appledore with an alter stone to Mithras and Romans were located at Lympe. Kent suffered from Viking raids, and two raids occurred in the marsh area in 841 AD and 892 AD, where it is known that Viking longships rowed past New Romney

and managed to get as far as Appledore. This may account for the Anglo-Saxon hoard of some 370 coins found east of Appledore Heath near Hornes Place. In 1380, the French also invaded Appledore, burning the village and church. On the outskirts of the village is the Royal Military Canal, built as part of the defence against a potential Napoleonic invasion.

- 4.1.2 It is thought that the origins of the name mean 'at the apple tree' and is recorded in old English as 'aet paem apuldre' before settling on its current spelling by 1610 AD. The Domesday book records the village as having 78 households, considered large for the period with a church and six fisheries. Storms in the 13th century affected the water course of the River Rother, which eventually changed course to run out to the sea near Rye and meant that Appledore as a port lessened although situated on higher ground it retained its status especially when in 1359, King Edward III granted a charter for a weekly market and annual fair.
- 4.1.3 The area of Romney Marsh has always been thinly settled compared to other parts of Kent, which accounts for the overall lack of buildings before the 19th century except in New Romney or Lydd. The society would have consisted of the sheep farmers, shepherds or fishermen. One of the reasons for the lack of people was that the marshlands were considered unhealthy due to the possibility of marsh ague, a form of malaria prevalent until the 19th century. The only people that lived there were those that had to.
- 4.1.4 The region in the 18th century had a lack of settled gentry. By the 19th century the village had a school and Wesleyan Chapel as well as the construction of the railway with a station east of the village. The common land like the Heath, to the north of the village had been divided by the mid-19th century into small fields and sold.
- 4.1.5 Hasted, a 18th century historian, describes the parish as 'the soil of this parish is for the greatest part moorish, boggy, and senny; though some of the upper or northern part of it is sandy, with some coppice wood on it..... The houses are but meanly built, and mostly inhabited by graziers, lookers, and smugglers. The vast quantity of marshes which lie contiguous and come close up to it, make it very unhealthy,'

- 4.1.6 In World War II Appledore and the Marsh became a Restricted Area when passes were required to enter and sheep were evacuated inland.

4.2 Historical Map Progression

Symondson Map 1596

- 4.2.1 This shows Appledore on the edge of the Romney Marsh and the Isle of Oxney with the Appledore Channel flowing south west of the village. The map shows it lies on the road from Tenterden towards New Romney. Appledore lies at the western end of the Rhee Wall that formed the boundary between Romney Marsh and Walland Marsh being of two parallel earth banks having been built in the 13th century. The Rhee wall has not contained water since the Medieval period (Fig.4).

Andrews, Dury and Herbert map of 1769

- 4.2.2 Andrews, Dury and Herbert published their atlas some thirty years before the Ordnance Survey, immediately becoming the best large-scale maps of the county. The ribbon development of the core of Appledore can be seen to the south of the PDA on the higher ground with Appledore Green (now known as Appledore Heath) also on higher ground to the north. The PDA lies west of the building of Walnut Tree Farmhouse on the junction of the Tenterden Road and The Street in Appledore. By the western side of the PDA, the maps suggests that there is a stream. The area to the west of the PDA is also annotated to suggest it is marshy (Fig. 5).

Ordnance Surveyors Drawings 1797

- 4.2.3 This map shows greater detail in the land use and field boundaries. Walnut Tree Farmhouse to the east can be located and the PDA forms part of a larger 'L' shaped field around the farmhouse. The core of the village is still to the south. Other than plots behind the houses along The Street, which are regular in shape and size, the other fields away from the village are much more irregular and reliant upon drainage channels. The area is predominately one of pasture. This map also suggests that there is a windmill located on the eastern side of the junction of Tenterden Road and The Street (Fig. 6).

Tithe Map from 1841

- 4.2.4 The tithe map shows greater detail. The 'L' shaped field around the farmhouse has been subdivided and the boundaries of the PDA are now in place. The PDA is

a field designated 374 and called 'five acres' and is of pasture. Field 373 to the east is an orchard at the rear of Walnut Tree farmhouse located in area designated 372. All three of these areas are owned and occupied by Thomas Paine. Field 261 is under separate ownership of The Archbishop of Canterbury with the lessee Edward Boys. Field 374 has a footpath running diagonally across the field from the north west corner towards the southern boundary. The northern end of the eastern boundary with the farmhouse shows a pond and there is a further pond in the south west corner of the PDA. South of this corner there is a drainage channel suggesting the stream previous noted is now within a man-made channel (Fig. 7).

Historic OS map 1877

4.2.5 There appears little change. The field to the south has been sub-divided (Fig. 8).

Historic OS map 1898

4.2.6 There is little change. The field to the south has been sub-divided. The map shows the western boundary as a drainage channel (Fig. 9).

Historic OS map 1907

4.2.7 There is little change (Fig.10).

Historic OS map 1933

4.2.8 There is little change (Fig.11)

4.3 Aerial Photographs

Appledore, 1929

4.3.1 This shows the PDA at the far end of the village with the PDA as a field next to Walnut Tree Farmhouse. There are hedges along the western and southern boundaries, which also includes mature trees (Plate 1).

1940s

4.3.2 The aerial photograph shows the original bungalow that was located on the plot of Elm Lodge within the PDA for the first time. There is a fence around the property and the remainder of the PDA is still a field. To the south east of the PDA on the western side of The Street a number of houses have also been built. South

of these houses, there is still a field between the houses and the core of the village (Plate 1).

1960s

- 4.3.3 The boundary within the PDA around Elm Lodge has become a hedge along the line of the footpath. The remainder of the field of the PDA has been subdivided. There is no sign of the ponds that are in the south western corner and in the northern part of the western boundary although these are likely to be masked by vegetation. Along the southern boundary in the PDA are a number of small outbuildings (Plate 2).

1990

- 4.3.4 The hedge dividing the fields in the centre of the PDA, along the line of the footpath has been removed to be replaced by fencing. The buildings in the field previously seen along the southern boundary are no longer in place and the field appears to be used as pasture. New housing has been built on the western side of The Street north of the core of the village. Immediately south of the PDA are farm buildings in an area known as Magpie Farm, which planning at the time allowed for the siting of a single temporary mobile home (Plate 3).

2003

- 4.3.5 The bungalow has been demolished and replaced by the current Elm Lodge. The hedges and trees around the boundary of the PDA have increasingly matured (Plate 4).

2019

- 4.3.6 There appears little change at the PDA. To the south, Magpie Farm and the buildings have been replaced by five new houses in the plot. A pond can be seen adjacent to the south west corner of the PDA. (Plate 5).

4.4 Walkover Survey

- 4.4.1 A walkover survey was undertaken on the 5th November 2019. Within the PDA is Elm Lodge and the area of the PDA is currently the land surrounding the house. Elm Lodge is accessed from Tenterden Road and the house sits in the north east quarter of the PDA. The PDA is diagonally bisected by a public footpath, on a

north, north west to south, south east axis and effectively divided the PDA into two. The PDA is broadly level ground except for the far western portion which sloped downwards towards a ditch on the other side of the boundary. The western side of this footpath in the PDA is currently pasture for horses. Immediately south of the house, is a small garden, which will remain as part of Elm Lodge. South of the garden along the southern half of the PDA is also pasture for horses. Beyond the southern boundary of the PDA is the 2018 housing development on an area known as Magpie Farm, which is accessed via a road from The Street. To the east is Walnut Tree Farmhouse, which given the mature vegetation along the boundary between the two properties prevents any intervisibility other than a glimpse of the top of the roof and chimney stack. The mature vegetation boundary on the northern side along Tenterden Road, also means that Elm Lodge and the PDA cannot currently be viewed from the road except a brief glimpse through the entrance gate. The western boundary is also mature vegetation with empty hardstanding area before there is an arable field. Aside the boundary there is a water filled ditch which forms into a pond at the south west corner of the PDA.

5 ASSESSMENT OF HERITAGE ASSETS

5.1 Introduction

5.1.1 It has been identified that immediately east of the PDA is the Grade II listed Walnut Tree Farmhouse designated heritage asset (listing 1070998), which is worthy of further investigation. As such the following assessment seeks to identify the significance of this heritage asset and to what extent the PDA contributes to their significance. In addition, given that the PDA is 80m north of the Conservation Area, it is appropriate to consider the significance and impact of that too.

5.1.2 No designated heritage assets are recorded within the PDA itself.

Walnut Tree Farmhouse

Architectural Interest:

5.1.3 The building is considered to be a late Medieval timber framed building that was refronted in the 18th century. The chimney stack is thought to be 17th century.

The earliest map identified that clearly shows the farmhouse is on the 1797 Ordnance Surveyors Map and possible in the 1767 Andrews & Dury map. Given its potential age back to the Medieval period, the building is considered to have architectural significance.

Historical Interest:

- 5.1.4 Upon evaluating the historic map appraisal and the tithe records, the farmhouse would have been one of a number of isolated scattered farms on the hinterland north of Appledore. The KHER records a farmstead at the location of a dispersed multi-yard plan farmstead where the farmhouse was in a detached position and only the farmhouse remains. At the time of the tithes when the farm was owned and occupied by Thomas Paine, Walnut Tree Farmhouse was on the southern side of The Tenterden Road/The Street junction, whereas the farm outbuildings were located on the northern side of the junction. The land associated with the farm was mainly the fields to the west of the farmhouse on the southern side of the Tenterden Road (373, 374, 375, 377, 376, 288 and 289) only plot 378 on the northern side of the Tenterden Road was part of the farm. Based on the aerial photography, these farm outbuildings existed until sometime between the 1960s and 1990 when they were demolished. Sometime between the 1933 Historical OS map and the 1940s aerial photograph, the field immediately west of the farmhouse had the original Elm Lodge built on it. And to the south, 12 semi-detached houses fronting The Street.

Conservation Area

- 5.1.5 A conservation area is defined as an 'area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance' Planning (Listed Buildings and Conservation Areas) Act 1990. Conservation Areas are environments which are considered worthy of protection as a result of a combination of factors such as the quality of design and setting of the buildings or their historic significance.
- 5.1.6 Walnut Tree Farmhouse lies outside of the Conservation Area to the north. Ashford Borough Council has not prepared a Conservation Area Appraisal for Appledore but the Conservation Area was first designated in 1987.

5.1.7 The village essentially grew naturally over hundreds of years as a linear type of settlement with the church located at the southern end close to what would have been the southern edge of the marsh. The settlement grew northwards of the church where the plots are smaller and close together. The further away from this core of the village the density of housing is far less having only been infilled during the 20th century and usually on larger sized plots. The village due to its long growth period is home to a wide variety of successive styles or architecture and materials with more modern housing at the northern end of the village. The Street boundaries are well vegetated with hedges and trees mainly obscuring the houses behind creating a closed feel. It is only once you pass the Tenterden Road junction of The Street does the landscape and views open up either side of the road with open fields behind low hedges until the hamlet of Appledore Heath is reached. As the church at the southern end of the village is to one side to the west, views of the church are only seen in a couple of places nearby, through gaps in buildings. Within the village itself, the church and its tower cannot be seen.

5.2 The Setting

5.2.1 Walnut Tree Farmhouse is located at the junction of The Street and Tenterden Road at the far northern end of the village. Originally isolated as part of a farm complex on the hinterland of Appledore, the setting did not really alter until that of the 20th century in the 1930s when the original Elm Lodge was built to the west and the 12 semi-detached houses to the south. Subsequently, by the 1960s, Hawthorn, a development of 22 semi-detached houses in a close off the eastern side of The Street just to the south east of Walnut Tree Farmhouse was built. The next impact to its setting was that immediately south of the Farmhouse, the southern part of the farmhouse plot, the detached house of Walnut Tree Court was built in the late 1980s. Then in 2018 to the south west of the farmhouse a development of 5 houses we built at Magpie Farm. These developments are screened from the farmhouse by mature vegetation on the boundary. There is little by way of views of the farmhouse along The Street or Tenterden Road with only small glimpses of parts of the building through gaps in the hedging. Whilst the

house is two storey it, is smaller in height than that of modern two storey houses, which reduces its visibility.

- 5.2.2 Consequently, in terms of the heritage asset's immediate visual setting, the due to the vegetation, it is not possible to directly view the heritage asset from the PDA except for brief glimpses of the chimney stack in places.

Summary of Significance:

- 5.2.3 Given the above it is concluded that the extent of the heritage asset's original setting is limited by its natural landscape boundaries, and that the PDA makes a negligible contribution to its visual setting. The asset retains much of its Medieval/Post Medieval structure with many later enhancements. It is considered to have aesthetic and historical interest, and it is this that forms its primary heritage significance.

6 DEVELOPMENTS PROPOSALS AND ASSESSMENT OF IMPACT

6.1 Development Proposals

- 6.1.1 The proposed development is for three detached bungalows each with a detached garage to the west and south of Elm Lodge (Fig. 3).

6.2 Assessment of Impact

- 6.2.1 Step 1 of the methodology recommended by the Historic England guidance *The Setting of Heritage Assets* (see Methodology above) is 'to identify which designated heritage assets might be affected by a proposed development. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a designated heritage asset or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view'. Consideration was made as to whether any of the designated heritage assets present within or beyond the 500m study area (Fig. 2) include the site as part of their setting, and therefore may potentially be affected by the proposed

development. Assets in the vicinity identified for further assessment on the basis of proximity and intervisibility comprise:

- Walnut Tree Farmhouse
- The Conservation Area

Walnut Tree Farmhouse

6.2.2 From our findings, the primary heritage significance of Walnut Tree Farmhouse is its aesthetic and historic interest as a Late Medieval/early Post Medieval timber framed house with later additions forming the farmhouse of a dispersed farm complex where the outbuildings were to the north on the opposite side of the road. There is no longer any relationship between Walnut Tree Farmhouse and the farmland as identified by the tithes, which had separated from that of the farmhouse during the first half of the 20th century, including that of the land of the PDA. Therefore, the farmhouse's historical setting has already been affected by modern development. The vegetation ensures that there is currently no intervisibility with the PDA and that it does not contribute to its significance.

6.2.3 The landscape boundaries on the PDA are to be strengthened along the western boundary of the PDA, which will mitigate any potential visual impacts from the wider landscape to the west.

6.2.4 Therefore, overall any impact caused to the significance of the heritage asset would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.

Conservation Area

6.2.5 The village includes a large number of listed buildings from the Medieval period onwards and is considered to have high significance. However, the majority of listed buildings that lie in the Conservation area are located away from the PDA to the south in the historic heart of the village close to the Parish Church. The Conservation Area is residential in character with a number of different styles. Consideration will need to be given as to the vernacular used for the proposed development in order to blend into the streetscape in order that the PDA has a neutral impact. However, the surrounding houses of the PDA are a mixture of

styles from the Post Medieval, 1930s, 1980s and 2018. The entrance to the development will be from Tenterden Road and therefore will not be able to be viewed from the road except as you pass the access point. From the Conservation Area of The Street, the existing roadside housing plus the new development at Magpie Farm prevent any intervisibility with the Conservation Area. The proposed residential dwellings are consistent with the scale and external materials found in the local area and will be appropriate in context of the local environment. Therefore, the proposed development will not impact the view from the Conservation area towards the PDA.

7 CONCLUSION

7.1 Introduction

- 7.1.1 The purpose of this Heritage Statement was to assist the Local Authority to fully understand the impact of the proposed development as required by the NPPF on the significance of any Heritage Assets affected, including any contribution made by their setting. This Heritage Statement has been prepared by SWAT Archaeology for Mr Matthew Parsler in support of the application for proposed developments of Land at Elm Lodge, Appledore, Kent.
- 7.1.2 This report has demonstrated that the PDA lies close to a number of Listed Heritage Assets and is close to a Conservation Area. This report has focussed on the designated asset closest to the PDA, being The Grade II listed Walnut Tree Farmhouse immediately east of the Site as the others in the assessment area have no intervisibility and are not impacted by the proposed development and will not encroach upon the Conservation Area.
- 7.1.3 This statement demonstrates that the significance of Walnut Tree Farmhouse resides in its historical and aesthetic interest, which will not be affected by the proposed development. The farmhouse no longer has any direct relationship with the land of the PDA and the proposed development will not impact upon the historic and aesthetic fabric of this building. Consequently, the proposed development does not affect its significance. Walnut Tree Farmhouse and also the Conservation Area have extremely little or no intervisibility with the PDA either as the result of vegetation or other residential development and therefore will not impact upon their setting.

- 7.1.4 This heritage statement has found that the designated heritage assets will remain unaffected by the proposed development and that the proposed development will produce no harm on the setting or significance of these assets.
- 7.1.5 The proposed development for new residential housing will offer public benefits and will outweigh any 'less than substantial' impact to Walnut Tree Farmhouse and the Conservation Area and outweigh any potential harm done.

8 OTHER CONSIDERATIONS

8.1 Archive

- 8.1.1 Subject to any contractual requirements on confidentiality, two copies of this Heritage Asset Assessment will be submitted to the LPA and Kent County Council (Heritage) within 6 months of completion.

8.2 Reliability/Limitations of Sources

- 8.2.1 The sources that were used in this assessment were, in general, of high quality. The majority of the information provided herewith has been gained from either published texts or archaeological 'grey' literature held at Kent County Council, and therefore considered as being reliable.

8.3 Copyright

- 8.3.1 Swale & Thames Survey Company and the author shall retain full copyright on the commissioned report under the Copyright, Designs and Patents Act 1988. All rights are reserved, excepting that it hereby provides exclusive licence to Mr Matthew Parsler (and representatives) for the use of this document in all matters directly relating to the project.

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10 APPENDICES

10.1 Appendix 1: Statutory List Description

10.1.1 Walnut Tree Farmhouse

Heritage Environment Record Number: TQ 92 NE 144

List Entry Number: 1070998

National Grid Reference: TQ 95486 29969

Type of Record: Grade II

Date of Listing: 16th August 1962

Period: Medieval/ Post Medieval

Summary: Possible late mediaeval timber-framed building refronted in C18. Two storeys red brick. Hipped tiled roof with pentice behind and C17 chimneystack. Wooden eaves cornice. Three sashes with glazing bars intact. Doorcase with flat hood over.



Figure 1: Location map of Walnut Tree Farmhouse

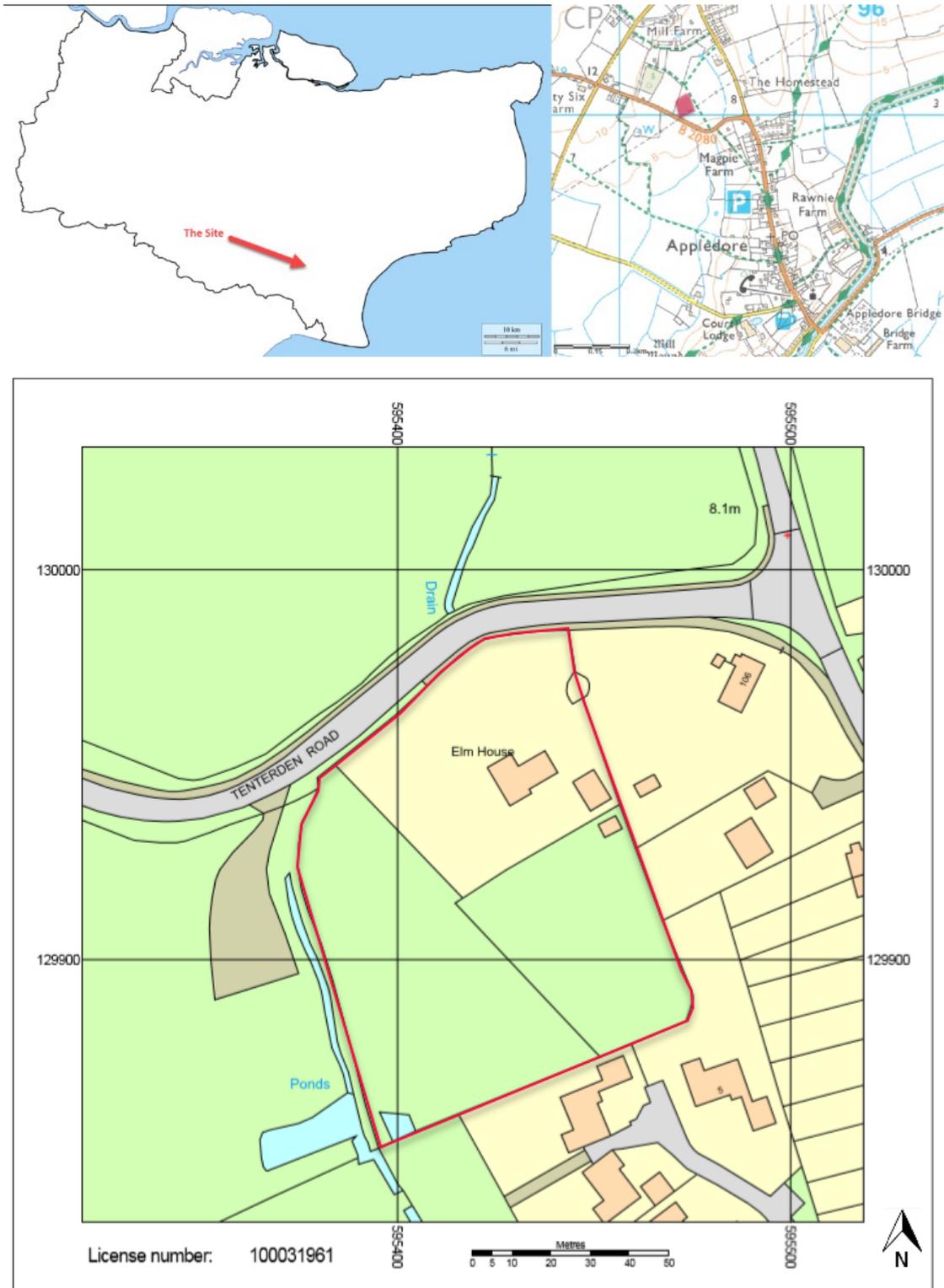


Figure 2: Site location map, scale 1:10,000 and 1:1,250.



Figure 3: Proposed Development Area,



Figure 4: Symonson Map, 1596

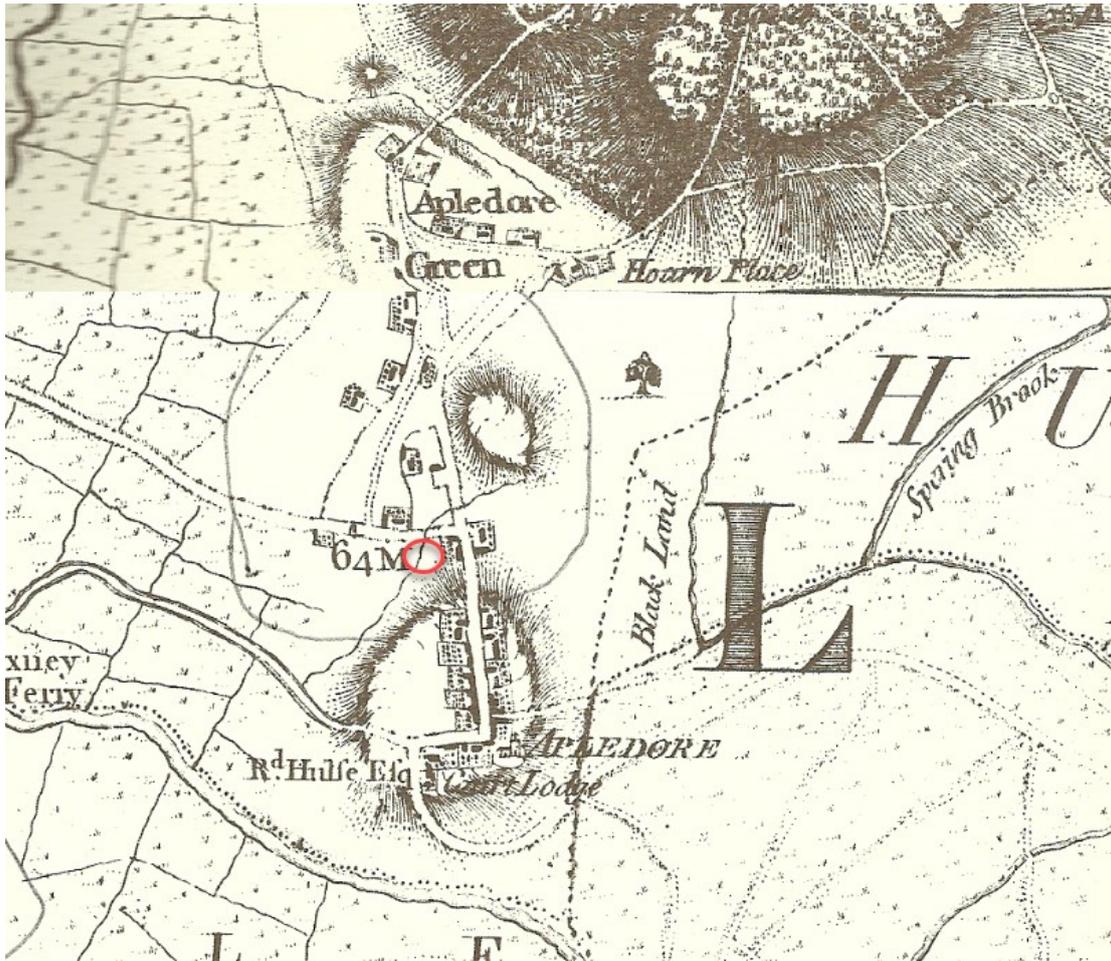


Figure 5: Andrew, Dury and Herbert Map from 1769



Figure 6: Ordnance Surveyors Drawing, 1797



Figure 7: 1841 Appledore Tithe Map



Figure 8: Historic OS Map 1877



Figure 9: Historic OS Map from 1898



Figure 10: Historic OS Map 1907

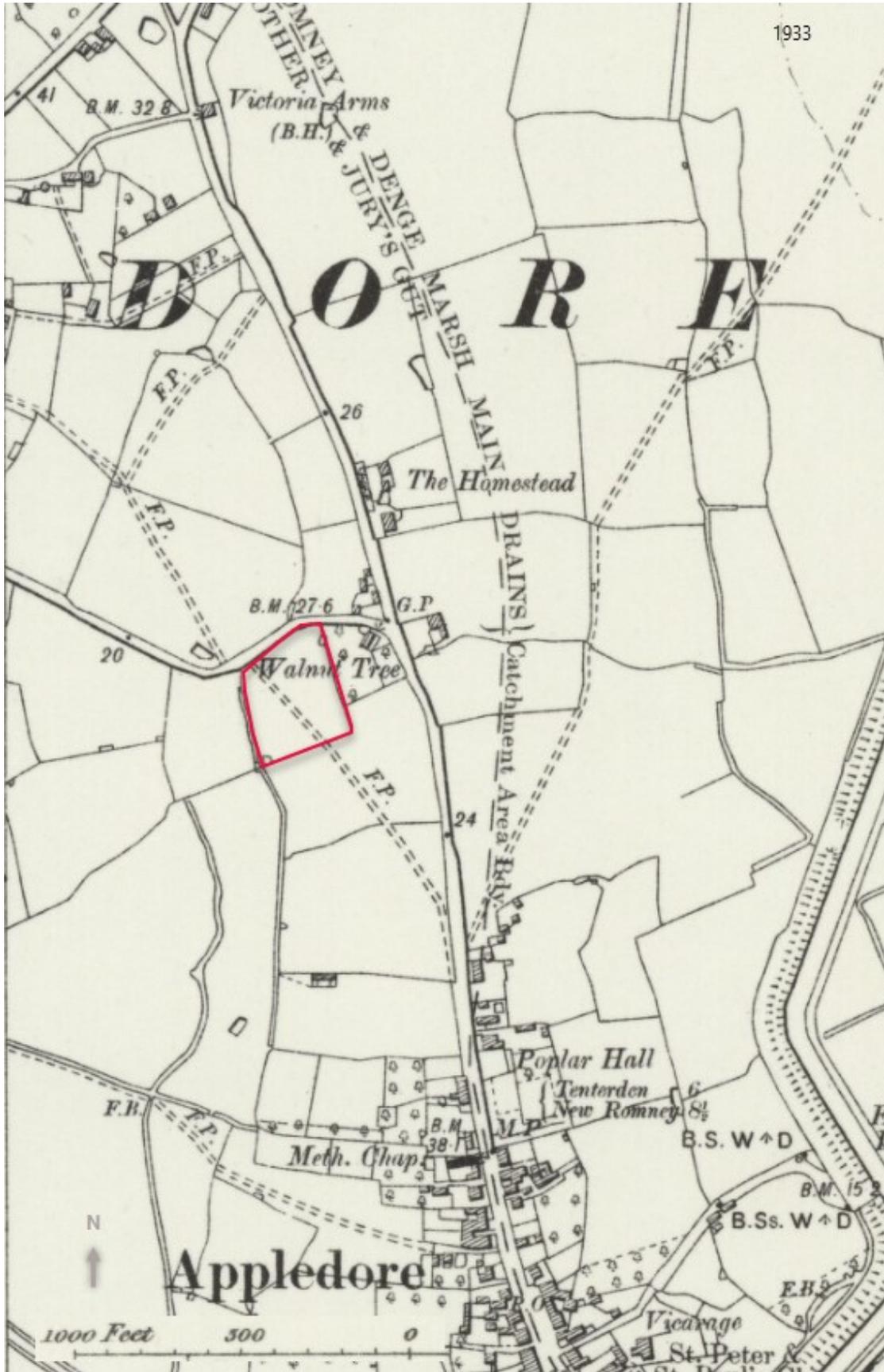


Figure 11: Historic OS Map 1933

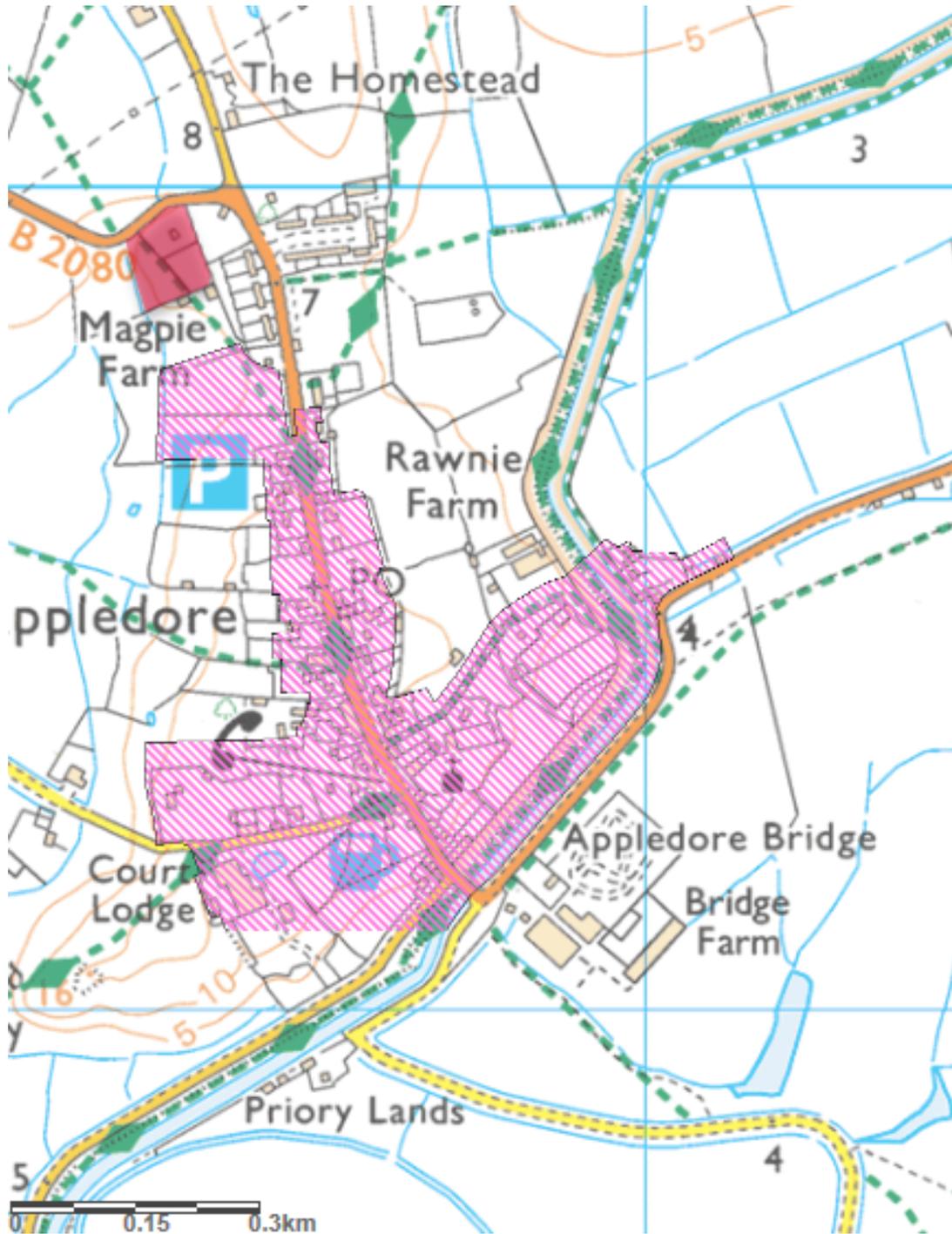


Figure 12: Appledore Conservation Area



Plate 1: Appledore in 1929, PDA highlighted in red



Plate 2:1940s. All at an altitude of 595m (Google Earth).



Plate 3: 1960 (Google Earth)



Plate 4: 1990 (Google Earth)



Plate 5: 2003 (Google Earth)



Plate 6: 2019 (Google Earth)



Plate 7: View across PDA from south west corner (facing NE).



Plate 8: View across PDA from south east corner (facing NW).



Plate 9: View towards the southern boundary (facing SSE).



Plate 10: View from the western boundary across the PDA (facing E)



Plate 11: View across the PDA from the north western corner (facing SE)



Plate 12: View from the middle of the PDA towards the southern boundary (facing SSE)



Plate 13: View from the middle of the PDA towards Walnut Tree Farmhouse (facing NE)



Plate 14: View of the northern boundary from Tenterden Road. Entrance is on the right hand side (facing SW)



Plate 15: View towards the PDA from The Street (facing NNE)