Heritage Statement Addendum for Conversion of redundant agricultural buildings at Stonehouse Farm, Dillywood Lane. Rochester, Kent, ME3 8EN.

Site name and site code	Stonehouse Farm Rochester (SHF20)
Address of site	Dillywood Lane, Rochester, Kent, ME3 8EN
Grid Reference	The farmstead is centred on TQ 73196 71299

1.0 Introduction

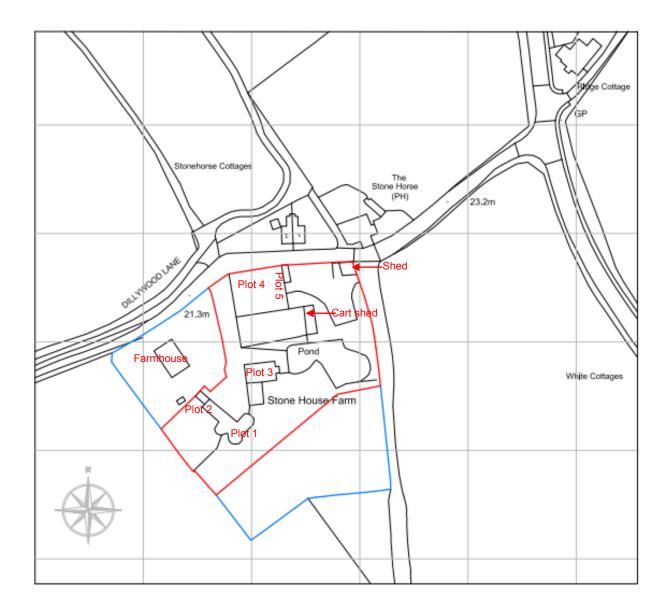
1.1 This addendum follows pre-application advice with the local planning authority and should be read in conjunction with the pre-application Heritage Statement prepared in May 2020 (West, R., 2020. Pre-Application Heritage Statement in connection with Conversion of redundant agricultural buildings to residential units at Stonehouse Farm, Dillywood Lane, Rochester, Kent, ME3 8EN. Report number BH/SSF/0120 Rev.C). Full planning permission and listed building consent is sought for the conversion of a group of redundant agricultural buildings at Stonehouse Farm to create five new dwellings with parking, a new garage, landscaping and ancillary works. Although the buildings are non-designated heritage assets, they can be considered curtilage listed as Stonehouse Farmhouse, which is situated immediately west and north of all buildings within the farmyard, is a Grade II listed building.

The buildings which comprise 'The Site' are labelled on Fig. 1 as follows:

- Plot 1 and 2; a triple Oast House with stowage.
- Plot 3; a single storey, 19th century Cart Shed/Barn (South Barn).
- Plot 4; a Covered Yard (North Barn) c.1860s, consisting of three single-storied, roofed structures orientated approx. E-W and attached to Plot 5 on the east side.
- Plot 5; a Covered Yard (North Barn) c.1860s, consisting of a two–storey structure orientated approx. N-S and attached to Plot 4 on the west side.
- In addition there is a single-storey, 19th century, west facing open-fronted Cattle Shed within a walled enclosure.

Demolitions are proposed as follows:-

- Diesel tank plinth on E side of Plot 5 all modern breeze block walls to be removed.
- Prefabricated garage to east side of Plot 5 to be removed.
- Shed at NE corner of Plot 5 to be removed.
- A garage with charging point and bike store for Plot 5 will replace the demolished shed and prefabricated garage currently on that plot.



Location Plan Scale 1:1250

Fig. 1. Location map showing the site and the proximity of the farmhouse (Reproduction in whole or in part is prohibited without the prior permission of the Ordnance Survey ©Crown copyright and database rights 2018, OS licence No.: 100055392.)

2.0 Planning background

2.1 National Planning Policy Framework (NPPF)

In June 2018, Government policies relating to planning were defined in the National Planning Policy Framework, which superseded the 2012 version. Section 16 (paragraphs 184-202) of the framework (Conserving and enhancing the historic environment) outlines specific policies relating to the historic environment and the role it plays in the Government's definition of sustainable development.

Local planning authorities (LPAs) are required to 'set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment', recognising that 'heritage assets are an irreplaceable resource' and should be conserved 'in a manner appropriate to their significance'.

The framework requires that planning applicants should 'describe the significance of any heritage assets affected' by their application, 'including any contribution made by their setting'.

We believe that the application, along with the pre-application Heritage Statement and this addendum, addresses this. All relevant policies are fully covered in the Access and Planning Statement which accompanies the Heritage Statement.

3.0 Schedule of Works

- 3.1 The proposals for each plot are as follows:
- Plot 1 and 2; the Oast House will be converted into two dwellings; Plot 1 which is a 3 or 4-bedroom home and Plot 2, a 3-bedroom home.
- Plot 3; this single storey, L-shaped Cart Shed is to be converted to a 2-bedroom home.
- Plots 4 and 5; the Covered Yard is to be divided with Plot 4 converted to a single- storey, 4 bedroom home and Plot 5 converted to a double storey, 4 bedroom home.
- Plot 5; the open fronted Cattle Shed is to be converted to create a garage and storage area.
- 3.2 A general principle of minimising subdivision and new openings has been adopted for each building and follows on from the pre-application site visit and advice issued by the senior planning officer (Correspondence from Mary Smith, Medway Council, dated 20th July 2020). The proposals have been sympathetically re-designed to incorporate the majority of suggestions regarding the application. The following statement was issued by the Senior Planning Officer:

"Against this planning policy background, in consideration of the principle of the proposed development, you would first need to set out why the buildings could not be used for, or put back into use for, agricultural purposes, together with a justification of why a residential use is proposed, including specific reference to the impact of the proposed change on these heritage assets. Assuming that this can be achieved the proposed re-use of buildings in the green belt is likely to be acceptable in principle on the basis that the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction. Any extensions or alterations should not result in disproportionate additions over and above the size of the original buildings and there should be no greater impact on the openness of the green belt."

- 3.3 The Oast House (Plots 1 and 2) is to be divided into two units. Considerable thought has been given to the line of division, in order to achieve viable accommodation whilst respecting the historic plan form of the building. The sub-division of the central area of the ground and first floors of the stowage building is acknowledged to cause harm to the heritage asset, but is unavoidable if a functional and commercially attractive second unit is to be provided. The disruption to the plan form and historic fabric has been kept to a minimum and it is hoped that this can be viewed as less than substantial harm to achieve the optimum long-term use of the building.
- 3.4 The proposals for the L-shaped Cart Shed (Plot 3; South Barn) have been sympathetically designed so as to preserve the setting and historic fabric and in particular, the glazing to the north elevation is to be recessed to preserve the legibility of the former open fronted cart bays.
- 3.5 The Covered Yard (North Barn) has also been sympathetically designed so as to preserve the setting and historic fabric. This is to be divided into two units; the western unit (Plot 4) is

- single-storey and incorporates the large space of the covered yard. The eastern unit (Plot 5) is two-storied.
- 3.6 The open fronted Cattle Shed is to be retained, following advice issued by the Conservation Officer and converted to garage/storage use.
- 3.7 Replacement buildings are limited to a garage with charging point and bike store for Plot 5 which will replace the demolished shed and prefabricated garage currently on that plot.

4.0 Pre-Application Advice

- 4.1 The initial scheme was submitted and considered at a pre-application site meeting in June 2020 with the senior planner and conservation officer for Medway Council. A letter dated 20th July 2020 ref. PRE/20/1262 provided further detailed advice as discussed above.
- 4.2 With regards to the advice issued by the conservation officer, *specific* and detailed comments regarding the heritage assets are fully addressed in the impact statement in Section 11 below, with *general* comments addressed as follows:
- General principle of use proposed this has been justified in the accompanying planning statement.
- Plot 1&2; Oast retention of attached timber structure preferred now retained.
- Plot 1&2 Oast; access from Stone Horse Lane unacceptable now removed.
- Plot 4 North Barn retain the 'hangar' (cattle byre) for household use now retained.

5.0 Heritage and other assets affected by the proposals:

1: Scheduled Monument (SM)	
2. Listed Building (LB)	х
3. Conservation Area (CA)	
4. Registered Park and Garden (RPG)	
5. Historic Battlefield (HB)	
6. Locally Listed Heritage Asset (LLHA)	
7. Archaeological Notification Area (ANA)	
8. Other Non-Designated Heritage Asset (including below ground archaeology)	Х
9. Green Belt Area	х
10. Area of Outstanding Natural Beauty	

6.0 Archaeological and historical background.

As the Site does not lie within an Archaeological Notification Area, a full Historic Environment Record (HER) search was not considered to be necessary. However, the pre-application heritage statement does include some references taken from the HER records which have been included below for clarity. Stonehouse Farmhouse (HER Ref: TQ77 SW1037) is a Grade II listed building which dates to the 18th century or possibly earlier. The farmstead comprises an Oast House (HER Ref: TQ77 SW1065), Cart Shed (HER Ref: TQ77 SW1066), Covered Yard (HER Ref: TQ77 SW1067) and Cattle Shed (HER Ref: TQ77 SW1068) all of which date from the mid to late-19th century. Map regression evidence presented in the pre-application Heritage Statement reveals that it was arranged as a multi-yard, regular courtyard plan, with the detached farmhouse forming the north-western corner, between the Oast House to the south and Dillywood Lane to the north. It goes on to describe the growth of the area as follows:

'The 1895 OS Edition shows Wainscott as a small linear settlement of less than 50 dwellings, with a school and public house, separated from Stonehouse Farm by open fields. By the date of the publication of the 1938 OS edition, Wainscott has expanded and shows some amalgamation with Frindsbury to the south. Further infill development on the north side of Wainscott towards Stonehouse Farm occurred during the 1960s, as shown by the 1966 OS edition. By the 1980s, the formerly open land to the south of the A289 had been almost entirely infilled, with development abutting the main road.'

6.2 The farmstead is described by the Kent Historic Environment Record as 'a post-medieval (1700) farmstead located in an isolated position which has suffered partial (less than 50%) loss of its original form'. All buildings were appraised during the Kent Farmsteads Survey in 1990 when a plaque was fixed to one of the roundels stating that it was erected by Mr James Rich in 1840? (Last digit difficult to read). In addition there is a date of 1866 painted onto the stowage building. The map regression also shows that the third roundel was built sometime after 1860.

'Land parcels and settlement patterns on the Hoo were shaped by the use of gavelkind tenure in medieval Kent; as land was shared out, new dwellings were constructed in some of these scattered parcels, meaning that medieval farmers were more likely to live in farmsteads and hamlets dispersed throughout the fields, rather than in villages' (Historic England 2015, The Hoo Peninsula Landscape). Stonehouse Farm, together with Brickhouse and Sole Street Farms, is a characteristic example of these scattered farmsteads.

- 6.3 Stone House Farm also falls within the Cliffe Woods Farmland Landscape Character Area as defined by the 2011 Medway Landscape Character Assessment (MLCA). The farm abuts the western boundary of the Landscape Character Area (LCA), which follows with the border with Gravesham Borough.
- 6.4 Stonehouse Farm falls within the 'Hoo Peninsula, Northern Coast and Parkland' sub-area of the North Kent Plain and Thames Estuary National Character Area as defined by the 2014 Kent Farmsteads Guidance. The Guidance notes that "Farmstead groups with less than 50% change since c.1900 are rare by national standards 33.2% in the North Kent Plain, 26.7% in the Thames Estuary, which with Romney Marsh place these areas in the lowest categories of survival". The integrity of the agricultural buildings at Stonehouse Farm is therefore an unusually important survival which increases the significance of the farmstead. The Kent Farmsteads Guidance also identifies the Hoo Peninsula as "historically dominated by arable and fruit growing". It further notes that cow houses are "not a common feature in Kent" and oast houses are uncommon in this area. The Oast House and Cattle Shed at Stonehouse Farm are therefore further features of interest which increases the rarity and value of the site.

7.0 Archaeological potential.

7.1 Archaeological evidence suggests the Hoo has been inhabited since the Palaeolithic period. In the 19th century, a Bronze Age sword (HER No. TQ77 SW37) was discovered close to Stonehouse Farm, although the exact findspot is unknown. It is likely that this object was a stray, un-stratified find and consequently it is unlikely that further *in-situ* finds from this period are likely to survive intact. Two large-scale excavations on the Hoo peninsula uncovered evidence of human activity from the Mesolithic through to the 20th century (Archaeology South-east. 2017. F31 Between Thames & Medway: Archaeological Excavations on The Hoo Peninsula & Its Environs. SpoilHeap Monograph 13.) However, these appear to be confined to the Damhead Creek power station and Isle of Grain—Shorne gas transmission pipeline. A third excavation, at the A2 Activity Park, was adjacent to the other large-scale excavations, which allowed the site to be set firmly in its local context. Significant activity was

- attested throughout the Bronze Age, Iron Age and Roman periods including domestic settlement, agriculture, ritual burial practices, pottery production and salt-working.
- 7.2 In addition, new evidence in relation to the nature of prehistoric occupation, Roman industrial exploitation and the scale of Anglo-Saxon and medieval settlement on the Hoo peninsula was uncovered although the excavation did not extend as far south as the Site. However, it does prove that the area has the potential for rich exploitation of historic sites although it is fairly unlikely that the proposals will reveal hitherto unknown, *in-situ*, buried archaeological features, given the level of disturbance already within the Site, as discussed below.

8. 0 Existing impacts.

8.1 The construction of the farmstead is likely to have significantly eroded any surviving, intact archaeological features below ground, although there is a chance that residual artefacts may be encountered during any ground works involved with the project. As the Site does not lie within an ANA it is not considered that archaeological monitoring is necessary, should permission be granted.

9.0 Statement of significance.

- 9.1 Historic England (formerly English Heritage) provides guidance on establishing the significance of heritage assets and on defining the settings of listed buildings. These are the Good Practice Advice Notes in Planning Note 2 (GPAN2) Managing Significance in Decision-Taking' and Good Practice Advice Notes in Planning Note 3 (GPAN3) The Setting of Heritage Assets. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or streetscape. At least four sets of values can be ascribed to a place:
- Evidential value: the potential of a place to yield evidence about past human activity;
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present;
- Aesthetic value and the ways in which people draw sensory stimulation from a place;
- Communal value and the meanings of a place for the people who relate to it, or for whom it
 figures in their collective experience or memory.
- 9.2 The pre-application heritage statement states:

'Stonehouse Farmhouse is a fine example of this period of prosperity. It is also characteristic of the "occasional large brick [farmhouses]" identified by the Landscape Assessment of Kent as "[augmenting] the cultural and functional integrity of the area". The farmhouse itself therefore has significance both as a building of architectural interest and in its wider contribution to the Hoo landscape.'

The Historic England study of the Hoo highlights the impact of 20th century farming techniques on the survival rate of historic farm buildings of the peninsula. It notes "The traditional farmsteads on the Hoo Peninsula have experienced higher levels of change than elsewhere in Kent and other parts of England where farmstead survival has been mapped: 50 per cent of farms existing on the peninsula around 1900 have either been lost completely or only the main farmhouse survives, no longer occupied by a farming family. A further 20 per cent have lost over half their historic buildings". Historic England concludes decisively "Despite the impact of past and present industries on the peninsula, it always was, and largely remains, a predominantly agricultural landscape". Stonehouse Farm therefore holds significance in its contribution to the interpretation and character of the Hoo landscape as well as in its individual buildings.

Stonehouse Farm may therefore be viewed as an important survival, which embodies a number of significant phases of agricultural development on the Hoo Peninsula. The 18th century farmhouse relates to the important growth period associated with the development of new markets in London, Sheerness and Chatham, whilst the farm buildings which now form the context and setting of the farmhouse date represent mid to late-19th century changes in farming practices on the peninsula.'

10.0 Setting exercise

- 10.1 Historic England GPAN3 provides a structured approach to defining and assessing the setting of an historic asset. This discusses the importance of the character of an area, the context and views. Whilst the setting itself is not a heritage asset, it may have some significance in its own right.
- 10.2 The pre-application heritage statement states:

'Historic mapping reveals that the farm was originally set in an isolated rural location. Its proximity to Wainscott developed during the 20th century as the village expanded to the north...This sub-urban encroachment has substantially changed the landscape context of Stonehouse Farm to the south, but to the north, the open fields remain relatively unaltered and provide a valuable reference to its original setting.'

- 10.3 The setting of the farmstead, however, is typical of the area which is dominated by isolated farmsteads set within landscapes of medium-large scale irregular fields which were largely enclosed by the 18th century.
- 10.4 A new access was formerly proposed from Stonehorse Lane and was considered to be an unacceptable intrusion into the setting of the rural Green Belt. This proposal has now been removed, as have the proposals for new garages serving Plots 1 and 3. This is of positive benefit as they would impact on the setting of the historic farmstead. The new deigns have successfully responded to the pre-application issues raised by the Conservation Officer and it is considered that the proposals will now present very few impacts to the setting.

11.0 Impact assessment

11.1 Detailed responses to the new designs and proposals as outlined in the accompanying planning statement are listed below. The comments should be read in connection with the architect's drawings as follows, some drawings have been included and cross referenced where relevant:

Plots 1 and 2- Oast House existing plans/elevations 1788-01 1788-02 1788-03 1788-04

1788-05

1788-06

Plots 1 and 2- Oast House proposed plans/elevations

1788-07

1788-08

1788-09

1788-10

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1788-11
1788-12
1788-13
1788-14
1788-15
Plot 3 – Cart Shed/South Barn existing plans/elevations
1788-101
1788-102
1788-103
Plot 3 – Cart Shed/South Barn proposed plans/elevations
1788-104
1788-105
1788-106
1788-107
1788-108
Plot 4/5- Covered Yard (North Barn) existing plans/elevations
1788-201
1788-202
1788-203
1788-204
1788-209
Plot 4/5- Covered Yard (North Barn) proposed plans/elevations
1788-205
1788-206
1788-207
1788-208
1788-210
1788-211
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- 11.2 The farmhouse and garden will remain as it is, save for the area running behind (SW of), which is to be divided off into a garden for the Oast House in Plot 2. The end part of it is to be combined with some open land as a garden for Plot 1.
- 11.3 Plot 3 South Barn has a garden using former yardage at the rear (East side).
- 11.4 Plot 4 North Barn has a garden occupying the existing walled cattle yard on its south side.
- 11.5 Plot 5 has a garden to the east occupying the former machinery yard and is otherwise bounded by the two lanes.
- 11.6 Demolitions are proposed as follows:-

1788-212

- Diesel tank plinth on E side of Plot 5 all modern breeze block walls to be removed
- Prefabricated garage to east side of Plot 5 to be removed
- Shed at NE corner of Plot 5 to be removed
- A garage with charging point and bike store for Plot 5 is proposed in place of the demolished shed and prefabricated garage currently on that plot.

11.7 Impact statement for Plots 1 and 2; The Oast House

- The internal floor alterations have been designed sympathetically so as to retain the original walls, albeit with some new door openings inserted which are considered to be acceptable and of minimal impact (Fig. 2).
- The proposed windows in the SW elevation are generally acceptable but it has been suggested that the iron bands around the kilns should be kept; at present there are two on the SW kiln and one on the SE kiln. The top band on the SW kiln will need to be removed to facilitate one new window, with the lower band retained which is considered an acceptable compromise. The single band on the SE kiln will be retained. Where existing door openings are to be replaced with glazed doors, the timbers should be retained and fixed to the sides of the apertures where possible. The blocking of the open aperture in the NW elevation of the stowage building would need to remain legible.
- The re-instatement of the cowls to the Oast House kilns are fully supported and it should be noted that the traditional Kent design should be used (i.e. open 'fronted' without 'wings').
- The proposal to re-grade the raised earth around the rear and side of the Oast House would help with any damp issues within the structure and so is fully supported.
- The installation of a French drain around the perimeter of the kiln is also fully supported.
- In general the parking spaces have been fairly well designed in order to secure the setting of the farmstead.
- The division of the ground floor and first floor plans (Fig. 3) are considered necessary to achieve two commercially viable and functional units whilst still respecting the historic floor plan. This is considered to be of minimal impact and therefore creates less than substantial harm.

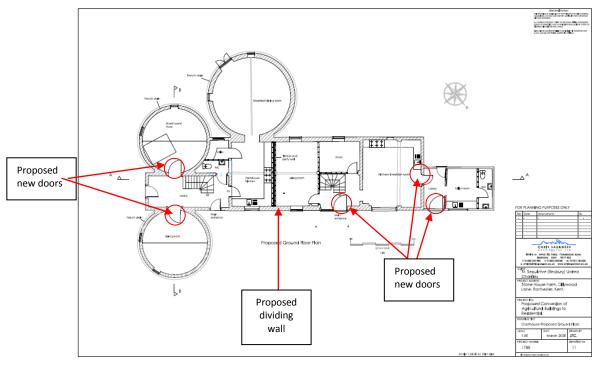


Fig. 2. Proposed ground floor plan © Chris Saunders Associates Ltd. drawing number: 1788/11.

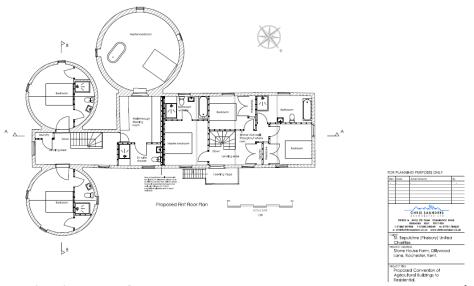


Fig. 3. Proposed first floor plan ©Chris Saunders Associates Ltd. drawing number: 1788/12.

 Whilst understanding the need to remove the first floor of the roundels (Fig. 4) to achieve sufficient headroom and comply with building regulations, it would be advised that the joists should be re-used in the new ceiling if possible. These joists form the original drying floor which is a key component of the roundels.

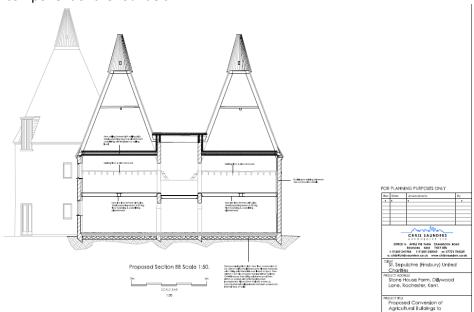


Fig. 4. Proposed section ©Chris Saunders Associates Ltd. drawing number: 1788/107.

11.8 Impact statement for Plot 3 (Cart shed)

- The proposed parking was an issue for this plot, as suggested by the Conservation Officers.
 These parking spaces have since been moved to the north side of the plot and are essentially
 tucked away behind the walled yard which belongs to the cattle shed to the north. This is of
 positive benefit.
- The glazed doors in the north elevation have been designed to sit behind the posts of the
 open bays (Fig. 5), thus preserving the legibility of these bays. It would be advisable to use
 horizontal fixed boards in the north bay here to preserve the legibility of this bay as originally
 being a closed bay with a window, as opposed to the open fronted bays.
- The proposed new windows and door in the south elevation should match those as specified elsewhere (as in the north elevation).
- The removal of some of the internal partition walls (Fig. 6) is considered to be necessary in order to utilize the space to create the best layout. This small loss is considered to be less than substantial and will still be partially legible within the trusses of the roof (Fig. 7).



Fig. 5. Existing ground floor plan ©Chris Saunders Associates Ltd. drawing number: 1788/106.

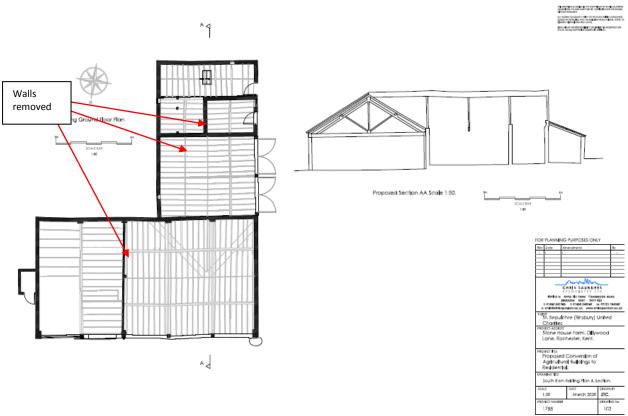


Fig. 6. Existing ground floor plan ©Chris Saunders Associates Ltd. drawing number: 1788/102.

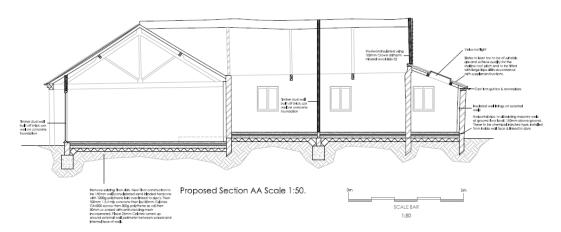


Fig. 7. Proposed section ©Chris Saunders Associates Ltd. drawing number: 1788/107.

11.9 Impact statement for Plots 4 and 5 (Covered yard and cattle shed)

• The ground floor proposals respect the original plan form of the structures (Fig. 8) with minimal impact to the historic fabric, apart from the removal of three partition walls; the steps leading to the first floor and the creation of new partition walls (Figs 9 and 10).

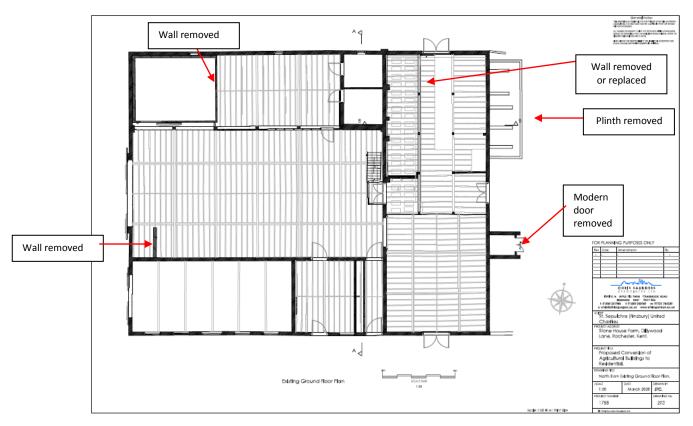


Fig. 8. Existing ground floor plan ©Chris Saunders Associates Ltd. drawing number: 1788/203.

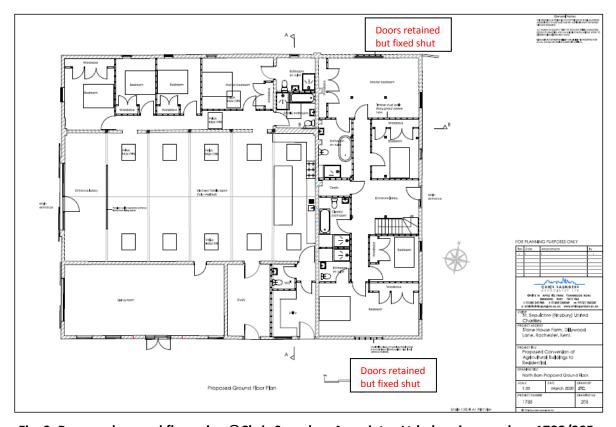


Fig. 9. Proposed ground floor plan ©Chris Saunders Associates Ltd. drawing number: 1788/205.

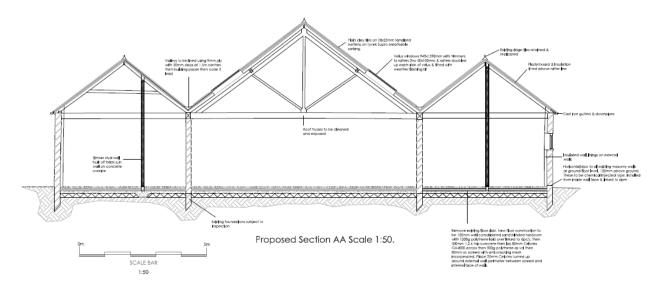


Fig. 10. Proposed N-S section ©Chris Saunders Associates Ltd. drawing number: 1788/210.

- The first floor proposals are limited to the eastern structure only and are considered to be moderate, given that the original layout is mostly open plan with a small, centrally located partitioned room accessed via steps attached to the north side of the structure. The partitioned walls will be adjusted to provide a toilet and landing for a new stairwell to be inserted, replacing the removal of the original steps. Whilst this is acknowledged as creating impact to the historic fabric, it is considered to be less than substantial and necessary in order to comply with modern building regulations.
- The widening of the current brick wall opening which forms part of the walled garden to the open fronted Cattle Shed is considered to be acceptable and causes less than substantial harm. However, it is recommended that the parking spaces are moved to the north if possible, in order to preserve the setting of the walled farmyard and Cattle Shed when viewed from the entrance to the west.
- The block work wall between the gardens of Plot 4 and 5 may need rebuilding as suggested by the conservation officer, using brick matching that elsewhere in the garden.
- The location of the proposed garage in the north-east corner of Plot 5 was considered unsuitable and the conversion of the existing storage building was mooted. This building (Figs 11-14) is *likely* to be considered curtilage listed but is of low significance and has no historical merit, being built from a mixture of materials, mainly corrugated iron with mis-matched, reused timbers and a block-work plinth. It is too small for use as a garage.



Fig.11. The south facing entrance to the shed (image provided by Chris Saunders).



Fig. 12. The east facing side of the shed (image provided by Chris Saunders).



Fig. 13. The inside of the shed with block-work plinth (image provided by Chris Saunders).



Fig. 14. The entrance to the shed looking south (image provided by Chris Saunders).

- Therefore the proposals are to demolish and re-design, using traditional materials which
 match those elsewhere in the farmyard i.e. weather-boarded walls and clay peg tiled roof.
 This is a considered compromise which may be acceptable to the planning officers.
- The east elevation proposals do not give any cause for alarm and in general will be of benefit, with two original windows reinstated and the removal of a modern doorway and plinth.
- The south elevation proposals likewise do not give cause for concern, with the replacement of two small windows with one wider glazed door considered to be of minimal impact.
- The proposed west elevation (Fig. 15) is designed so as to preserve the original aesthetics; the skylights in the roof should be of conservation grade and the original barn doors will be preserved and fixed in place. The insertion of two modern glazed doors here is considered to be essential to ensure functionality.



Fig. 15. Proposed west elevation ©Chris Saunders Associates Ltd. drawing number: 1788/207.

 Proposals to the north elevation are limited to the insertion of a new window which is considered to be of minimal impact.

12.0 Discussion and recommendations

- 12.1 This submission seeks full planning and listed building consent for the conversion of the Oast House, Cart Shed and Covered Yard to residential use, together with the adaptation of the Cattle Shed to serve as a garage/storage block. It is considered that the plans present the optimum viable use for the buildings which will enable long-term maintenance and the opportunity to conserve the heritage assets which are currently redundant and vulnerable.
- 12.2 The farmstead is of considerable historic and architectural interest as it retains the majority of its 19th century agricultural structures and plan form. The Site provides evidence of multiple phases of farming practices and holds significance not only in the intactness of its fabric and character of its buildings, but in their contribution to the wider interpretation and experience of the Hoo Peninsula landscape.
- 12.3 Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. We believe that the application sufficient justifies the public benefits of the proposals and therefore outweighs the impact.

- 12.4 The proposals presented at pre-application stage represent several iterations of drawings, following discussions to achieve a sympathetic conversion. Local and national policy and guidance has been considered from the outset, together with sound conservation principles, to conserve and enhance the fabric, character and setting of all heritage assets.
- Due to the Covid-19 pandemic, the consultant has not yet visited the site and it may be prudent for a full Historic Building Record to be requested by the local authority.
- 12.6 It is necessary to bear in mind that desk based appraisals do not provide a *definitive* statement on the likelihood of archaeological deposits being present within the proposed development area. Therefore we have to stress that this appraisal can only suggest the *potential* of that area to contain archaeological features/find spots. As such the conclusions presented herein can only be proven by the addition of fieldwork techniques.
- 12.7 However, it is not recommended that a watching brief is carried out on any below ground interventions, such as service runs, the reduction of any ground levels and any footings required within the buildings as ground reduction will be limited and based mainly inside the buildings. In addition, as the area does not lie within an Archaeological Notification Area, there is less potential for exposing archaeology.
- 12.8 The report is based on a non-invasive, non-structural survey; as such it can only extend to the items specifically covered. E&OE. Copies of paper OS Maps Reproduced from Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown Copyright. OS Licence No.100055392. We wish to point out that there is no guarantee that planning permission will be granted based on the opinion of ASL within this document. The above comments should be discussed with the Archaeological Officers and Conservation officers for Medway Council.

Lisa Jayne Fisher Cert.Ed., BA (Hons), MA Principal Archaeologist Archaeology Services Lewes January 2021



