



Heritage Impact Assessment

52 New Street, Ash,
Kent

November 2022 | Project Ref 8199B

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. We began life as Heritage Collective LLP in 2010, before becoming Heritage Collective UK Limited in 2014. Finally, in 2020, we became HCUK Group Limited.



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App. 1 Scale of Harm table (HCUK, 2019)

App. 2 GPA3 Assessment: Historic England's Guidance on Setting

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Classicus Estates. It relates to an application for planning permission for the residential redevelopment of 52 New Street, Ash, and the association plot of land to the north which extends to Sandwich Road. Dover District Council (DCC hereafter) are the determining authority.

1.2 There are no heritage assets on the site itself but the site is located within the setting of a listed building, the grade II listed 50 New Street (UID: 1070218) which is located adjacent to the site on its west.

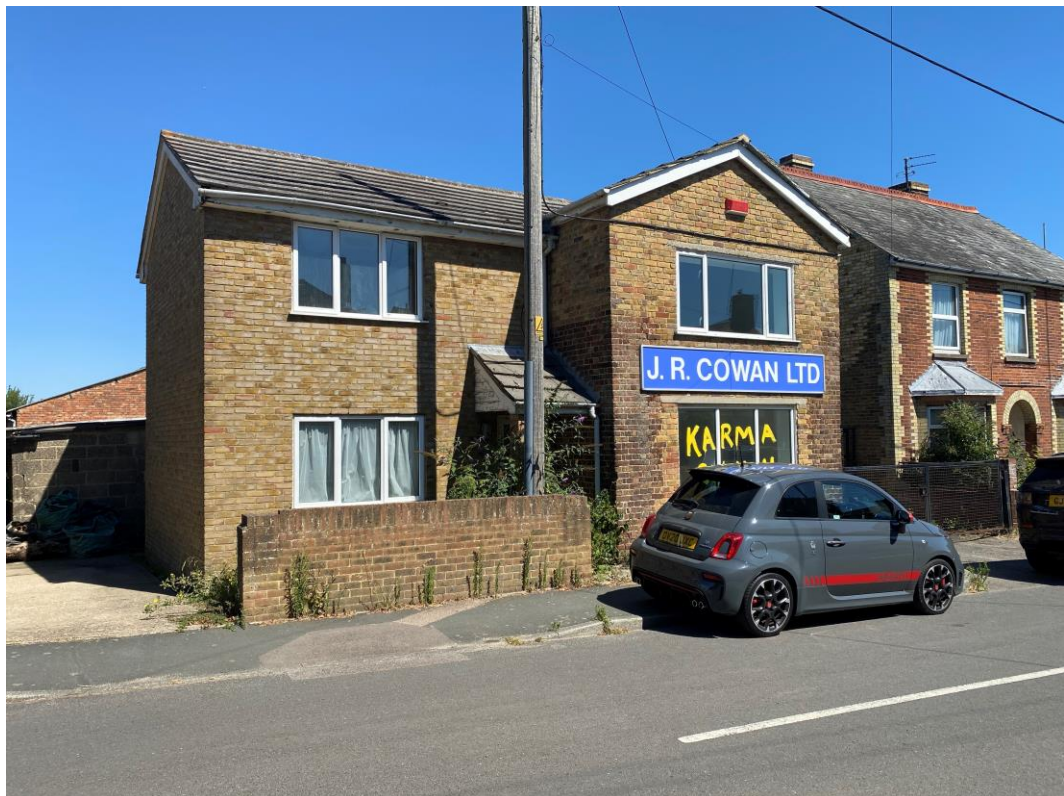


Figure 1: View towards the application site from New Street, Ash

1.3 In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2021) this statement describes the significance of the identified designated heritage asset.



Figure 2: View within the application site

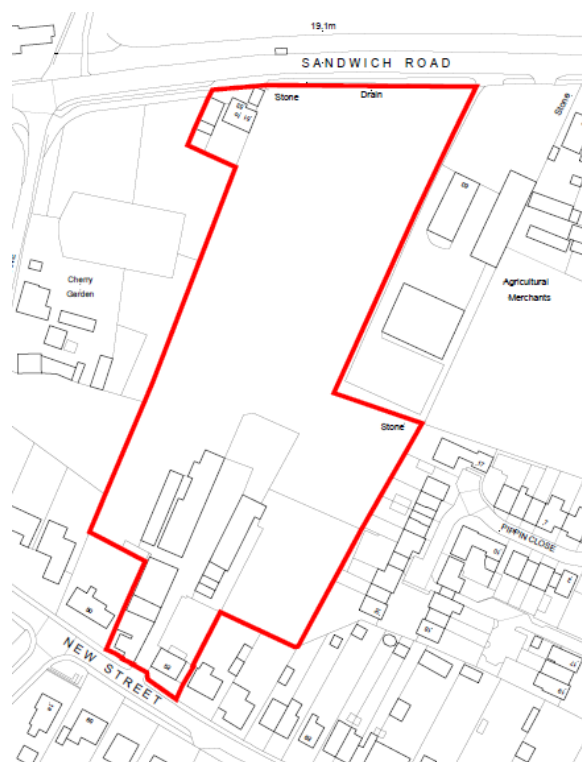


Figure 3: Site location plan

The Proposals

- 1.4** The site forms part of a wider allocation in the adopted Ash Neighbourhood Plan 2021 (Policy ANP7a) which covers land immediately east and west of the site and is for the residential development of that land for an estimated capacity of 95 dwellings.
- 1.5** The current proposed development relates:
- "Outline planning permission with all matters reserved (except for access) for the demolition of existing buildings, including 51-53 Sandwich Road, and the erection of up to 52 new homes, including affordable, access from New Street and Sandwich Road, together with associated parking, open space, landscaping, drainage and associated infrastructure"*
- 1.6** Access is proposed from New Street to the south and from Sandwich Road to the north. The illustrative masterplan provided within the submission demonstrates how the residential units could be accommodated on the site alongside parking and landscaping.
- 1.7** The significance and setting of the grade II listed 50 New Street has informed the proposals and the development seeks to provide the residential redevelopment of this site while preserving, and where possible enhancing, the heritage values of the listed building.
- 1.8** There are a number of other heritage assets located more distant to the site including The Street Ash Conservation Area and a number of listed buildings to the west and two listed buildings to the east. These assets are well removed from the site meaning that the proposed development would have no effect on their significance or setting. For these reasons, these assets have been scoped out of this assessment.

Purpose of this Statement

- 1.9** The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed

development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2021 and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made in August 2022.

2. Relevant Planning Policy Framework

2.1 The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹

2.2 For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³

2.3 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.4 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

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.

2.5 Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.6 The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.

2.7 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.8 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.9 The main elements of local planning policy for Dover are contained within the Core Strategy (2010), Land Allocations Local Plan (2015) and saved policies for the Dover District Local Plan (2002). There are no specific policies within any of these

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

documents which relate to listed buildings and as such the national planning policy takes precedent with regards to these issues.

2.10 The site is referenced in the Ash Neighbourhood Plan (adopted 2021) as an allocated site under Policy ANP7a. In full, this policy notes:

This site, as defined on Map 12, is allocated for residential development with an estimated capacity of 95 dwellings. Development proposals should comply with all relevant Policies in this Plan. Proposals which meet the following criteria will be supported:

7a.1 Any application for development is preceded by and is consistent with a development brief that has been agreed by Dover District Council; this must include an ecological survey;

7a.2 Any application of development is preceded by an archaeological assessment of the site and its submission to Kent County Council;

7a.3 There is a comprehensive approach to development of the whole site but if the site is developed incrementally, each phase must demonstrate that it will not prejudice the implementation of the whole development;

7a.4 The impact of the development on the setting of the village and wider landscape is minimised by reference to Policies ANP4, ANP5 and ANP6;

7a.5 The existing boundary hedgerows and vegetation are retained and enhanced as part of the development;

7a.6 Vehicular access to the site is from Sandwich Road and New Street;

7a.7 There is no vehicular access to the site from Cherry Garden Lane;

7a.8 Open and/or shared spaces should be maintained by a management company established by the developer with on-going maintenance responsibilities being held by this company; and

7a.9 Development should ensure that occupation is phased to align with the delivery of sewerage infrastructure, provide connection to gas supply and ensure future access to existing water supply and/or wastewater infrastructure for maintenance and capacity improvements

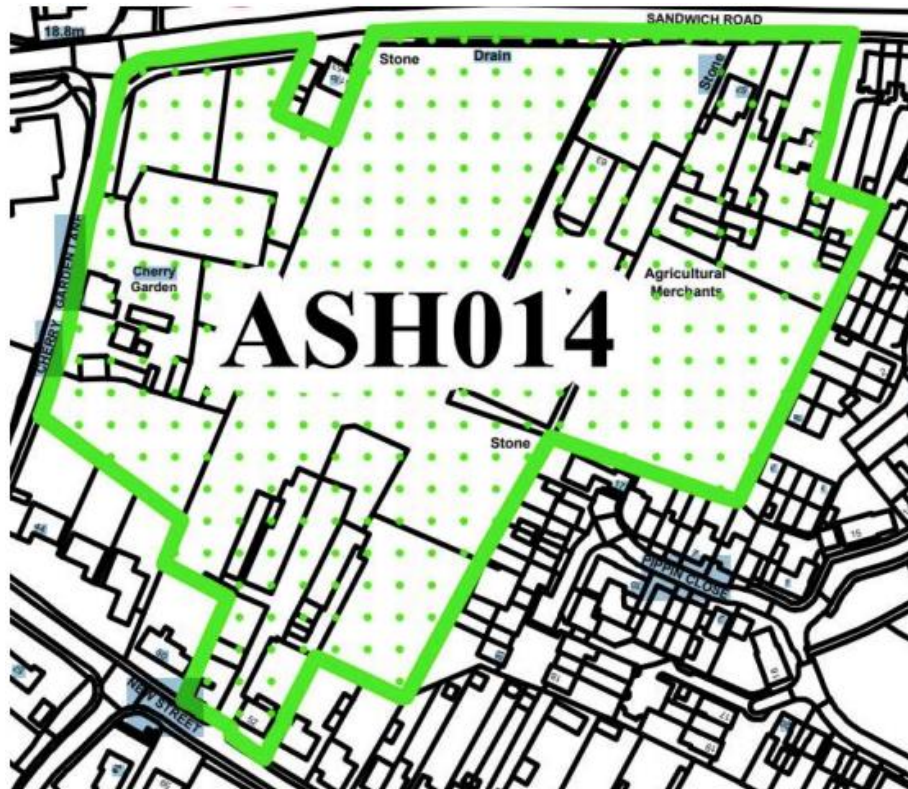


Figure 4: Map 12 from the Ash Neighbourhood Plan showing the wider allocation of the site

2.11 Policy ANP6 of the Ash Neighbourhood Plan ('Developments and Conservation') notes situations where development proposals will be supported. At part 6.7, the policy notes that development proposals will be supported where they respect, conserve and enhance the settings of Listed Buildings and street frontages as described in the Ash Character Assessment.

3. Background and Development

3.1 The first map which shows the site and its surrounds in any detail is the 1839 Ash Tithe Map (**Figure 5**). This shows that at that time, 50 New Street (now grade II listed) was an isolated dwelling located on the road side with an ancillary detached range to its east (perpendicular to the road).



Figure 5: 1839 Ash Tithe Map © The Genealogist

3.2 The plot (Plot 1020) which included most of the application site and the listed building was owned by John Friend and occupied by Thomas Sutton and was listed as 'Cottage and Garden'. Thomas Sutton was listed in the 1841 Census as a gardener living in a cottage on New Street with his family.

3.3 There is no built form either side of 50 New Street (aside from the ancillary building) and the application site itself forms part of the wider plot and part of an adjacent plot (Plot 1021). Plot 1021 was owned by James Tomlin and occupied by Samuel Reynolds Solley and was listed as sixteen acres of arable land in the associated Tithe Apportionment.

3.4

By the time of the first edition Ordnance Survey (OS hereafter) map of 1873 (**Figure 6**) there is a similar situation with regards to 50 New Street though changes to the plot boundaries on land to the north can be seen. While the earlier boundary between Tithe Plots 1020 and 1021 remains, the former western boundary of Plot 1020 has been removed and there is seemingly an orchard to the rear of 50 New Street spanning east until the road now known as Cherry Gardens. A similar arrangement is shown on the 1898 OS Map (not replicated here).



Figure 6: 1873 OS Map

3.5

By the time of the 1907 OS Map (**Figure 7**) more subdivision and some built form can be appreciated in the former Plot 1021. A similar arrangement is seen on the 1946 OS Map (not replicated here) and on a 1940 aerial photograph (**Figure 8**) which also shows more housing south on New Street.

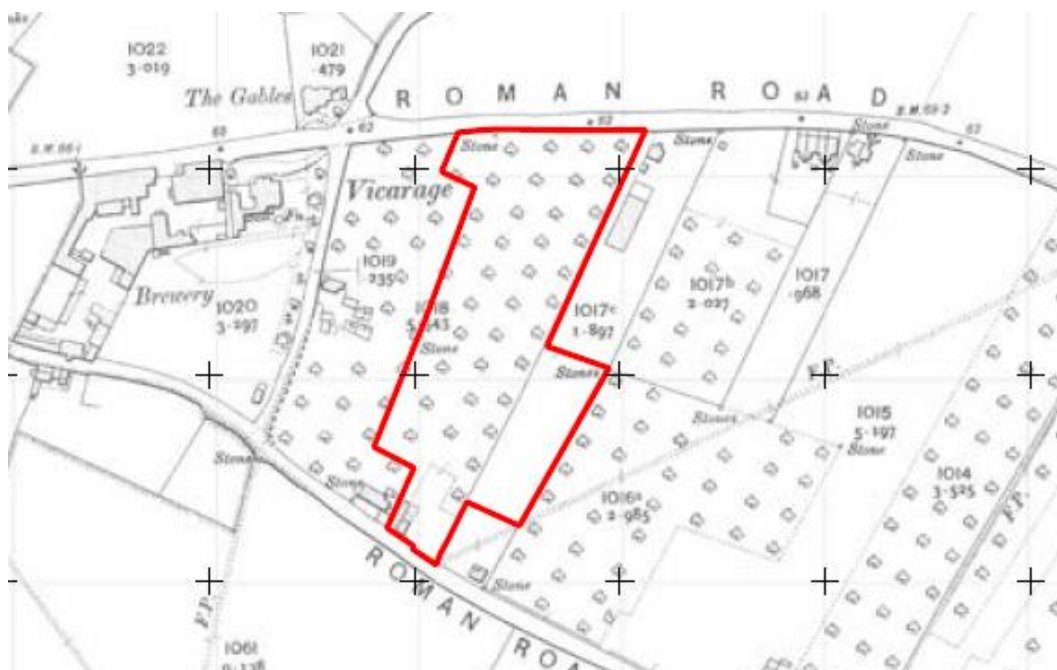


Figure 7: 1907 OS Map



Figure 8: 1940 aerial photograph of the site © Google Earth Pro

3.6

It is the 1955 OS Map (**Figure 9**) which first demonstrates that the site was being used as a nursery with a notation within the site and a number both street facing buildings and sheds seen on the southern part of the site. It is relevant to note that many of these buildings were directly to the rear of the garden of 50 New Street.

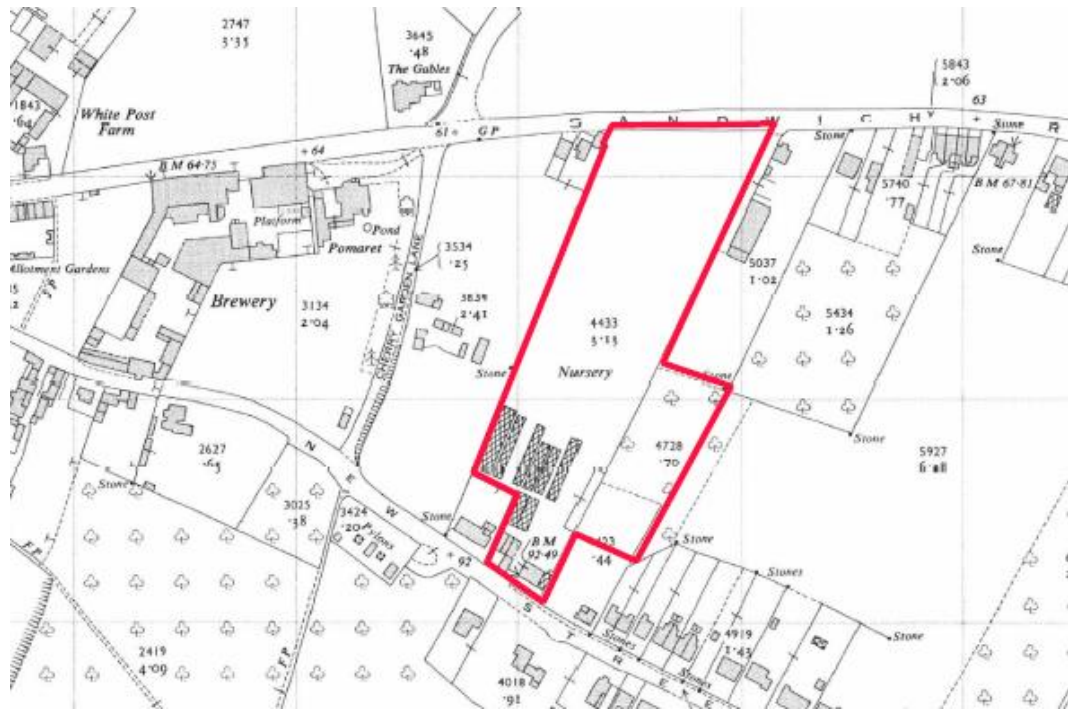


Figure 9: 1955 OS Map

3.7

At this point the eastern projection of the site into the former plot 1201 is not evident on the mapping but a 1960 aerial photograph (**Figure 10**) suggests that it formed part of the nursery by this date. This also correlates with the 1970 OS Map (**Figure 11**) which shows the nursery occupying the application site in its current form.

3.8

Today only some of the nursery buildings remain on the site and those directly to the north of the garden of 50 New Street have been removed.



Figure 10: 1960 aerial photograph showing the southern part of the application site

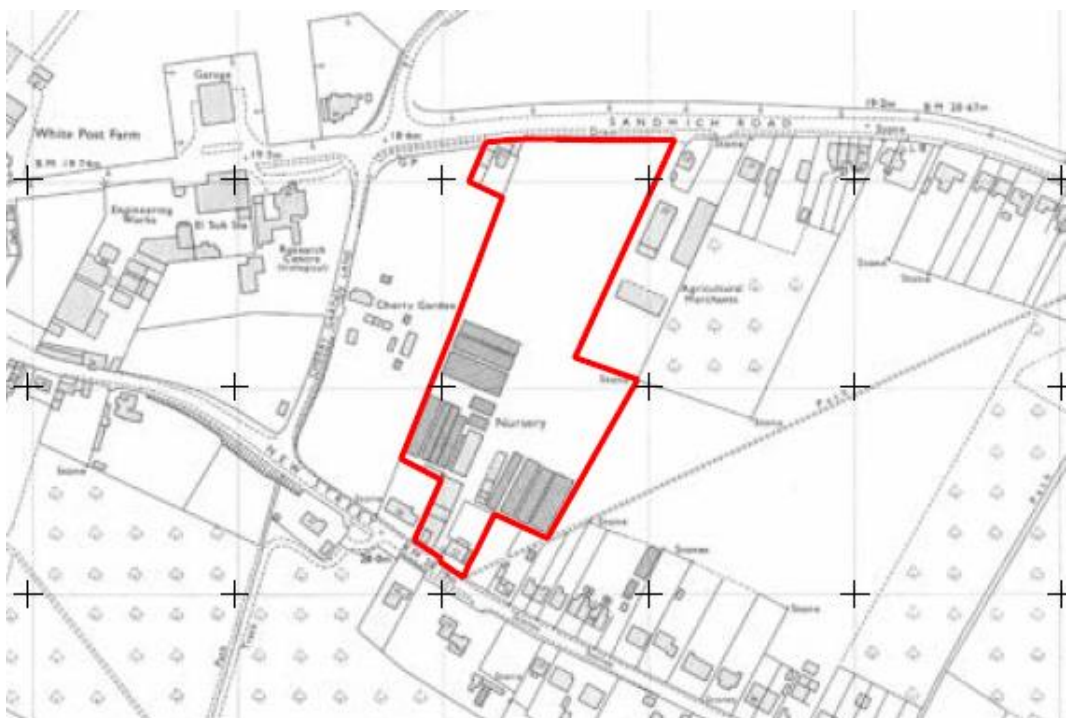


Figure 11: 1970 OS Map

4. Statement of Significance

Assessment of Significance

4.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and where applicable it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

50 New Street (grade II)

4.2 50 New Street (UID: 1070218) was first listed in November 1987. Its list description, one of the older styles for identification purposes only, reads:

"House. c1700, with late C18 rear wing. Red brick and thatched roof with weather-boarded and slate roofed rear wing. One storey and attic on plinth with plat band. Roof with kneelered gables, 2 raking dormers and stacks to end left and to end right. Two multi-paned wooden windows on ground floor, with central glazed door with brick moulded surround, semi- circular arch on pilaster and illegible date stone over. Brick and slate 2 storey garage wing to right of no special interest."

4.3 The building is of clear architectural and historic interest which primarily relates to the quality and form of its exterior which comprises a red brick thatched portion dating from c.1700 with a late 18th century rear wing. The frontage building features an attractive moulded brick semi-circular arch on pilasters with a date stone. The rear elevation of the building (the later 18th century addition) is less decorative in form and more altered featuring modern windows. While of more limited architectural interest, this part of the building does demonstrate the way in which it developed during the 18th century.



Figure 12: C.1700 range of 50 New Street seen from the road



Figure 13: 50 New Street seen in conjunction with the modern extension to its east



Figure 14: View towards the rear elevation of the grade II listed building from within the site

- 4.4** As noted by the list description, the modern extension to the east of the historic core of the building is of no heritage value.
- 4.5** Historic interest relates to the building's illustrative value insofar as it provides evidence as to domestic, social and economic practices of the 18th century and how it provides evidence as to the development of Ash.
- 4.6** The listed building is best appreciated in views along New Street and Mill Field where the architectural interest of the building's frontage can be best experienced and its significance understood. As noted above, the rear elevation of the building is more altered. It is also less prominent in the surrounding streets and only readily visible from either the rear garden of 50 New Street or from within the site.
- 4.7** The building's setting has considerably changed over time. Historic maps (included in Section 3) show that the cottage was historically isolated from Ash as a small roadside dwelling. However, during the early 20th century the residential expansion of Ash led to the building being encompassed by residential linear development.



Figure 15: 50 New Street as seen from the junction of New Street and Mill Field



Figure 16: View of 50 New Street from Mill Field

4.8 As evidenced in Section 3, the majority of the site itself was historically associated with 50 New Street forming part of its gardens (though a small part of the site, the eastern projection, was outside its ownership at this time). It remained predominantly open and associated with the cottage until the mid 20th century when the site was developed as a nursery, was expanded to its current form and entered into separate ownership. Due to the site's later development into a separate nursery the only ability to appreciate the former historic links between the site and 50 New Street are via documentary evidence (i.e. those sources referred to in Section 3).

4.9 The existing built form on the site includes a series of frontage buildings pre-dating the nursery use and a series of mid 20th century sheds which were constructed as part of the nursery.

4.10 Frontage buildings within the site include 52 New Street which is a detached dwelling dating from the early twentieth century (c.1907-1940). This building is red brick with gault brick detailing and a symmetrical frontage, it's side elevation suggests that the building has been compressively reconstructed at some point. While a relatively modern dwelling which, along with others in the area, eroded the rural isolated character of the listed building, this structure now forms part of the general linear development of this part of New Street and is a neutral contributor to the significance and setting of the listed building.



Figures 17 and 18: Front (left) and side (right) elevations of 52 New Street

4.11 Directly east of 50 New Street is a stock brick building, formerly the offices of J R Cowen Ltd. While predominantly modern in its construction, this building appears to retain some limited earlier portions of brickwork (specifically on the frontage and

eastern side) perhaps indicating that it originated as the ancillary structure seen to the east of 50 New Street on historic mapping (Section 3). While containing some earlier fabric, the building has been heavily altered and extended to the front, sides and rear and is now appreciated as a modern commercial structure. It does not contribute to or better reveal the significance of the listed building.



Figures 19 and 20: Front and rear elevations of the J R Cowen Ltd building

4.12

Those buildings associated with the nursery comprise a series of large modern sheds of standardised form and construction. These structures are of no heritage value in their own right and, due to their form and late date, do not contribute to or better reveal the significance of the grade II listed building and could be considered to detract from the ability to appreciate the asset as a result of their scale and siting.



Figures 21 and 22: Existing modern nursery buildings within the site



Figures 23 and 24: Existing modern nursery buildings within the site

- 4.13** While the openness of the site is reflective of the former spacious and partly isolated surroundings of the listed building, the site no longer contributes to the significance of the asset due to presence of the modern nursery buildings and as a result of the site being significantly overgrown for a number of years (it was only recently cleared in August 2022).

5. Heritage Impact Assessment

- 5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in Appendix 2.

Proposed Development

- 5.2** The proposed development relates to an outline application for up to 52 residential units on the application site following the demolition of all buildings on the site except 52 New Street which would be retained as unit 1 within the site. New vehicular access points are proposed to the north (Sandwich Road) and south (New Street).
- 5.3** To the south of the site in the closest proximity to the listed building, the new access would be located between unit 1 (retained 52 New Street) and unit 2, a new residential unit, aligned perpendicular to the road and set back from the pavement edge. Units 3 and 4 are located behind the retained gardens of the grade II listed 50 New Street.
- 5.4** In accordance with the Ash Neighbourhood Plan policy ANP7a, while the site only contains the central portion of the wider allocation, it is necessary to demonstrate how the site could feed into the wider allocated area. The illustrative masterplan produced demonstrates this and includes an indicative layout for these areas which fall outside the current red line boundary (and therefore do not form part of these proposals).
- 5.5** As an outline application with all matters (except access) reserved, this assessment will consider the proposed development in the broadest terms based on the submitted illustrative masterplan and professional judgement as to what could reasonably be expected of a development of this type.



Figure 25: Illustrative masterplan showing the site layout and how that could connect to further areas of allocation outside the current red line boundary

Impact Assessment

5.6 As identified in the preceding section, the existing buildings on the site (both those fronting New Street and within the site associated with the nursery use) do not contribute to or better reveal the significance of the listed building. Indeed, the nursery buildings within the site could be considered to detract from the ability to appreciate the asset as a result of their scale and siting.

5.7 On this basis, the demolition of these structures (except for 52 New Street which will be retained and incorporated into the site) would have no bearing on the significance of the listed building. Instead, the removal of the buildings would offer opportunities for enhancement within the setting of the listed building through the carefully considered scale, placement and form of any replacement residential development.

- 5.8** As identified in the preceding section, the once rural isolated character of the setting of the listed building (as demonstrated by historic mapping contained within Section 3) has been long since removed as a result of the modern residential expansion of Ash and the introduction of large scale modern sheds on the application site. While the site itself is partly open in nature this has only a minimal connection with the listed building (part of its northern garden boundary) and the site was until August 2022 significantly overgrown for a number of years. Historic maps from the mid 20th century also indicate that built form associated with the nursery once more significantly surrounded the listed building.
- 5.9** As such, the site does not contribute to or better reveal the significance of the asset and development of the site would not, in principle, erode any important element of its setting. The development of the site would neither physically or visually isolate the listed building from positive aspects of its surroundings and the listed building's important relationship with its own gardens and New Street would remain entirely unaffected by the proposed development.
- 5.10** While there are some known historic between 50 New Street and the site, these are now only now evident through documentary evidence (i.e. the sources identified in Section 3) rather than via any appreciation of the asset's surroundings. These sources and the information they provide about the history of the site and its surroundings would not be affected by the development meaning this component of the asset's historic interest would be preserved.
- 5.11** As an outline application with all matters reserved, full details of the residential development are not yet available. However, the illustrative masterplan provides evidence as to how the residential units could be accommodated on the site without resulting in any sense of over development or a crowded nature. While not yet formulated, is it the intention of the proposals to ensure that the residential units are of an appropriate and locally in keeping scale, form and design so that it relates positively to its surroundings in terms of its design and form.
- 5.12** The masterplan also demonstrates how the significance and setting of the listed building has been taken into account. For example:
- In place of the existing prominent commercial unit on adjacent to New Street, unit 2 has been set back from the curtilage of the listed building and from the

road edge ensuring that it has a limited prominence in the street scene in comparison to existing built form. This will enhance views of the listed building from the east and west, allowing a greater appreciation of the listed building in longer range views and increasing the semi-rural character of the road edge.

- Modern nursery buildings which currently line the entire eastern boundary of the listed building's curtilage and much of the curtilage's northern boundary have not been replaced with built form providing a more spacious character to the immediate surroundings of the listed building.
- Units 3 and 4 have been staggered away from the northern boundary of the listed building providing it with an enhanced sense of spaciousness.
- The illustrative masterplan also shows how the development could be arranged so to provide a degree of visual permeability through the site ensuring that the development would not be overly prominent in the background of the listed building in views towards the asset.

5.13 Key views of 50 New Street are possible from along New Street and Mill Field where the architectural interest of the grade II listed building can be better appreciated. These views are likely to undergo some change as a result of the development. As noted above, views of the building from the east and west along New Street will be enhanced through the proposed development of the commercial street frontage unit and the siting of replacement built form set back, allowing a greater appreciation of the listed building in longer range views and enhancing the semi-rural character of the road edge.

5.14 Some modern residential development may be glimpsed behind the listed building, particularly in views from Mill Field, however this would not be dissimilar to the existing situation where modern residential development is prominent in the asset's setting and can be seen beyond it (for example the roof structures of Pippin Close). Importantly, in views of the building from New Street and directly adjacent to the asset (i.e. within its front and rear gardens) there would be no change to the listed building's skyline or silhouette as a result of the development and residential units being set back from its curtilage.

5.15 Views are also possible towards the rear of the building from both within the asset's garden and within the site. While the rear is more altered this part of the building

dates to the 18th century and not of great architectural interest, it does allow an appreciation of the asset's development over time. These views from the garden would be unaffected and various views from the site towards the listed building's rear elevation would remain to be possible.

5.16 While resulting in a notable change within the setting of the listed building, the proposed development would not be prominent within the assets setting since it would remove the existing prominent and poor quality nursery buildings on the site and the commercial frontage building and provide the listed building with more spacious and landscaped immediate surroundings. For the reasons identified elsewhere in this assessment, based on the information provided on the illustrative masterplan, the proposed development would not compete with or cause distraction from the appreciation of the listed building. This would be particularly the case in views of it from New Street where the building's historic character and form would remain evident and its origins as an isolated historic road side cottage, now subsumed by modern residential development along New Street, would continue to be understood.

5.17 The proposed development would introduce some additional movement to the rear of the listed building. However, given the asset's already busy surroundings (which include modern residential development to all sides and New Street), this is not found to be capable of affecting the significance of the asset.

Summary and Policy Compliance

5.18 Overall, the proposals would result in a change to the built surroundings of the listed building through the redevelopment of the nursery site to its east and north. While this will increase the amount of modern residential development within the asset's setting, this is already a prominent feature of that setting and the development results in a number of enhancements to the listed building's surroundings including:

- The removal of the poor quality modern built form associated with the former nursery;

- The setting back of built form from New Street allowing improved transient views towards the listed building from the east and west;
- The removal of the dilapidated and neglected character on the site; and
- The provision of more spacious and landscaped surroundings immediately adjacent to the curtilage of the listed building (i.e. its eastern and part of its northern boundaries).

5.19 There would be no change to the general character of the setting of the listed building which would continue to be appreciated as modern residential area. As noted above, the once rural isolated character of the setting of the listed building has been long since removed.

5.20 The site itself does not contribute to the significance of the asset and while the development would result in the removal of the site's current openness, it is relevant to note that the site has been significantly overgrown for a number of years and was only recently cleared. Development on the site would not affect the building's important spatial relationships with its garden and road and key views from Mill Field are unlikely to be affected while views west and east along New Street would be enhanced.

5.21 In summary, while resulting in a change within the setting of 50 New Street (grade II), the proposed development would not affect the significance or special interest of the asset or the heritage interest that asset draws from its setting. On this basis, the scheme would fall outside the remit of paragraphs 201-202 of the NPPF insofar as no harm would be incurred. There would be preservation for the purpose of the decision maker's duty under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990 and there would be compliance with local planning policy highlighted in Section 2.

6. Conclusions

- 6.1** This Heritage Impact Assessment has been prepared in accordance with paragraph 194 of the NPPF and relates to an application for outline planning permission for the residential redevelopment of a former nursery at 52 New Street, Ash and land to the north of that building. This report provides a proportionate assessment of the significance of those heritage assets affected by proposals, in this case the grade II listed 50 New Street, and this is followed by an assessment of the effect of the proposals on that significance.
- 6.2** 50 New Street is a grade II listed red brick and thatched road side cottage which dates to c.1700 with a later 18th century rear wing. The building is of clear architectural and historic interest insofar as its historic form and fabric and illustrative value. As demonstrated by historic maps and evidence contained within Section 3 of this report, 50 New Street was a historically isolated cottage which then only subsumed by the modern residential expansion of Ash in the 20th century. As a result, the setting of the building is no longer rural or isolated. While there are historic associations between the listed building and the application site these are no longer understood from an onsite assessment and are only evident through documentary sources. The site and its built form does not contribute to or better reveal the significance of the listed building.
- 6.3** As identified in the Introduction, the application site forms part of a site allocated for the introduction of up to 95 residential units. The site forms the central part of this allocated area and comprises the introduction of up to 52 residential units following the demolition of all existing buildings except for 52 New Street which would be retained and incorporated as a dwelling into the scheme. As an outline application with all matters (except access) reserved, this assessment has considered the proposed development in the broadest terms based on the submitted illustrative masterplan and professional judgement as to what could reasonably be expected of a development of this type.
- 6.4** As identified in Section 5 of this report (and supplemented by a GPA3 compliant assessment contained in Appendix 2) while resulting in a change within the setting of the listed building, this is not a change which would detrimentally affect the significance of the listed building or an appreciation of it. In addition to traditional

public benefits secured by the development (discussed elsewhere in the submission), the proposed development also secures a number of benefits which directly affect the listed building in a positive way which include:

- The removal of the poor quality modern built form associated with the former nursery;
- The setting back of built form from New Street allowing improved transient views towards the listed building from the east and west;
- The removal of the dilapidated and neglected character on the site; and
- The provision of more spacious and landscaped surroundings immediately adjacent to the curtilage of the listed building (i.e. its eastern and part of its northern boundaries).

5.22 In summary, while resulting in a change within the setting of 50 New Street (grade II), the proposed development would not affect the significance or special interest of the asset or the heritage interest that asset draws from its setting. On this basis, the scheme would fall outside the remit of paragraphs 201-202 of the NPPF insofar as no harm would be incurred. There would be preservation for the purpose of the decision maker's duty under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990 and there would be compliance with local planning policy highlighted in Section 2.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

GPA3 Assessment: Historic England's guidance on setting

In assessing the effect of the proposed development on the setting and significance of designated heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<i>Relevant Considerations</i>	50 New Street, Ash (grade II)
<i>Proximity of the development to the asset</i>	The application site is located directly east and north of the listed building
<i>Proximity in relation to topography and watercourses</i>	The topography of the area is generally flat and there are no watercourses of relevance to the proposals
<i>Position of development in relation to key views</i>	<p>Key views of 50 New Street are possible from along New Street and Mill Field where the architectural interest of the grade II listed building can be better appreciated. These views are likely to undergo some change as a result of the development. Views from the east and west will be enhanced through the proposed development of the commercial street frontage unit and the siting of replacement built form set back, allowing a greater appreciation of the listed building in longer range views and enhancing the semi-rural character of the road edge.</p> <p>Some modern residential development may be glimpsed behind the listed building, particularly in views from Mill Field, however this would not be dissimilar to the existing situation where modern residential development is prominent in the asset's setting and can be seen beyond it (for example the roof structures of Pippin Close).</p> <p>Views are also possible towards the rear of the building from both within the asset's garden and within the site. While the rear is more altered this part of the building dates to the 18th century and does allow an appreciation of the asset's development over time. These views from the garden would be</p>

	<p>unaffected and various views from the site towards the listed building's rear elevation would remain to be possible.</p>
<i>Degree to which the location would physically or visually isolate asset</i>	<p>The once rural isolated character of the setting of the listed building (as demonstrated by historic mapping contained within Section 3) has been long since removed as a result of the modern residential expansion of Ash and the introduction of large scale modern sheds on the application site. While the site itself is partly open in nature this has only a minimal connection with the listed building (part of its northern garden boundary) and the site was until August 2022 significantly overgrown for a number of years. As such, development of the site would not either physically or visually isolate the listed building from positive aspects of its surroundings. Its important relationship with its own gardens and New Street would remain entirely unaffected by the proposed development</p>
<i>Prominence, dominance and conspicuousness</i>	<p>While resulting in a notable change within the setting of the listed building, the proposed development would remove the existing prominent and poor quality nursery buildings on the site and the commercial frontage building providing the listed building with more spacious and landscaped immediate surroundings. Aside from the retained unit 1 and unit 2 (located on the road edge to the east of the listed building) the development would be set back from the listed building meaning that it would not be prominent within the asset's setting</p>
<i>Competition with or distraction from the asset</i>	<p>For the reasons identified elsewhere in the table, based on the information provided on the illustrative masterplan, the proposed development would not compete with or cause distraction from the appreciation of the listed building. This would be particularly the case in views of it from New Street where the building's historic character and form would remain evident and its origins as an isolated historic road side cottage, now subsumed by modern residential development along New Street, would continue to be understood</p>
<i>Dimensions, scale, massing, proportions</i>	<p>As an outline application with all matters reserved full details of the scale of residential units is not yet available. However, it is understood that the residential units will be of an appropriate and in keeping residential scale and the masterplan indicates</p>

	how the residential units could be accommodated on the site without resulting in any over development or crowded nature
<i>Visual permeability</i>	While an outline application with all matters reserved, the illustrative masterplan provided shows how the development could be arranged so to provide a degree of visual permeability through the site ensuring that the development would not be overly prominent in the background of the listed building in views towards the asset
<i>Materials and design</i>	As an outline application with all matters reserved full details of the materials and design of both buildings and landscaping etc. is not yet available but it is understood that it is the intention for development to relate positively to its surroundings in terms of its design and form
<i>Introduction of movement or activity</i>	The proposed development would introduce some additional movement to the rear of the listed building. However, given the asset's already busy surroundings (which include modern residential development to all sides and New Street), this is not found to be capable of affecting the significance of the asset
<i>Diurnal or seasonal change</i>	Matters of diurnal and seasonal change have been factored into the wider assessment
<i>Change to built surroundings and spaces</i>	<p>The proposals will result in a change to the built surroundings of the listed building through the redevelopment of the nursery site to its east and north. While this will increase the amount of modern residential development within the asset's setting, this is already a prominent feature of that setting and the development results in a number of enhancements to the listed building's surroundings including:</p> <ul style="list-style-type: none"> • The removal of the poor quality modern built form associated with the former nursery; • The setting back of built form from New Street allowing improved transient views towards the listed building from the east and west; and • The removal of the dilapidated and neglected character on the site.
<i>Change to skyline, silhouette</i>	In views of the building from New Street and directly adjacent to the asset (i.e. within its front and rear gardens) there would

Change to general character

be no change to the listed building’s skyline or silhouette as a result of the development being set back from its curtilage

There would be no change to the general character of the setting of the listed building which would continue to be appreciated as modern residential area. As noted above, the once rural isolated character of the setting of the listed building has been long since removed

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

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