

Former Pledge's Flour Mill

Ashford

HERITAGE STATEMENT | DECEMBER 2021

On behalf of Oliver Davis Homes



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Section 1

Introduction.

1 | Introduction

- 1.1 This Heritage Statement is supplied to provide an assessment of the significance of the former Pledge's Flour Mill, East Hill, Ashford (henceforth 'the Site') and the impact of the proposals on the Site's significance. The former Pledge's Mill is a non-designated heritage asset. It is located within Ashford Town Centre Conservation Area.
- 1.2 The proposals for the Site are as follows: 'redevelopment comprising the conversion of the existing Flour Mill, demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'superlounge'), 1 x office (Use Class E(g)(i)), retained access from East Hill, parking, and associated landscaping and infrastructure'.
- 1.3 This report will:
- Set out the relevant legislative, policy and guidance framework within which to understand the proposed redevelopment of the Site;
 - Provide a proportionate and robust analysis of the Site and surrounding area's historic development;
 - Offer a full description of the Site and identify relevant heritage assets;
 - Assess the significance of the Site and its appropriateness for development; and lastly,
 - Provide a detailed assessment of impact for the proposals on the significance of the listed buildings located on the Site.
- 1.4 The existing Site and surrounding area were appraised during a site visit in May 2021. Information has also been obtained from Kent Archives, as well as secondary publications and online sources.
- 1.5 The report is produced by Icen Projects. Specifically, it is authored by Stephanie Hammer MA (Hons) MSt (Cantab), Consultant - Built Heritage and Townscape, with review by Georgia Foy BA (Hons) MA, Senior Consultant - Built Heritage and Townscape, and Laurie Handcock MA (Cantab) MSc IHBC MCifA, Director - Built Heritage and Townscape

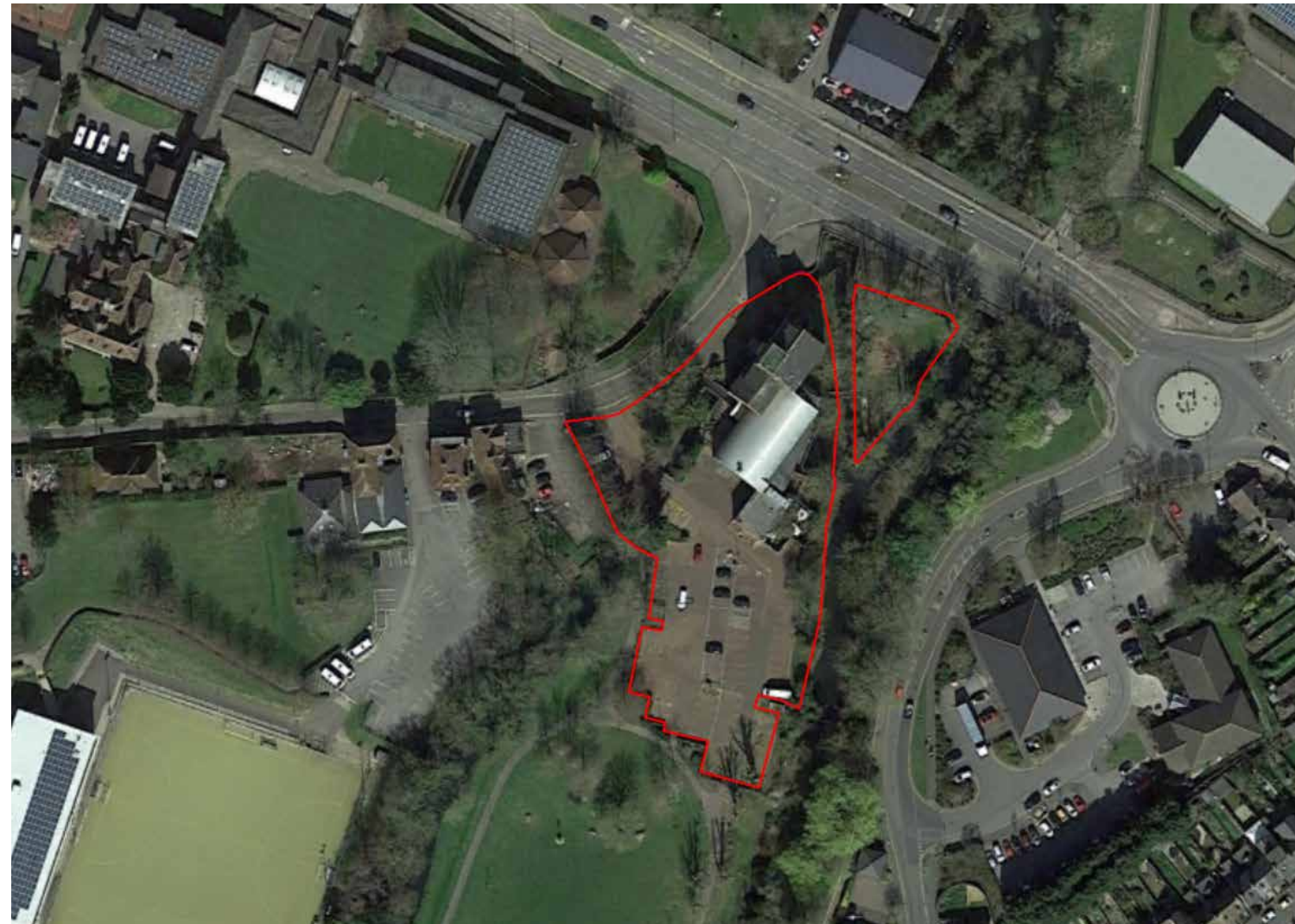


Figure 1.1 Site Location. Edited from Google

Section 2

Planning, Legislation, Policy & Guidance.

2 Planning, Legislation, Policy & Guidance

Legislation		National Policy	
2.1	Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.	National Planning Policy Framework (July 2021) (As amended)	identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’ Listed buildings and Conservation Areas are both designated heritage assets.
2.2	Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.	2.4 In July 2018, the government published the updated National Planning Policy Framework (“NPPF”), which was again updated in February, June 2019 and July 2021. This maintains the focus on sustainable development that was established as the core of the previous, 2012, NPPF.	2.9 ‘Significance’ is defined as ‘The value of a heritage asset to this and future generations because of its heritage interest. The 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.’
2.3	Section 72(1) of the Act, meanwhile, states that: <ul style="list-style-type: none">• ‘In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.’	2.5 This national policy framework encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach, which is reflected in the NPPF, as ‘constructive conservation’: defined as ‘a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment’ (Constructive Conservation in Practice, Historic England, 2009).	2.10 The ‘Setting of a heritage asset’ is defined as ‘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.’
		2.6 Section 12, ‘Achieving well-designed places’, reinforces the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms, in paragraph 130, the need for new design to function well and add to the quality of the surrounding area, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). Paragraph 134, meanwhile, states that great weight should be given to outstanding or innovative designs, which promote high levels of sustainability, or help raise the general standard of design in the area (provided they fit with the overall form and layout of their surroundings).	2.11 Paragraph 194 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 190, local planning authorities are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.
		2.7 The guidance contained within Section 16, ‘Conserving and enhancing the historic environment’, relates to the historic environment, and developments which may have an effect upon it.	2.12 Paragraph 197 emphasises that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
		2.8 Heritage Assets are defined in Annex 2 of the NPPF as: ‘A building, monument, site, place, area or landscape	2.13 Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. It emphasises that the weight given to an asset’s conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
			2.14 Paragraph 200 states 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.
			2.15 Paragraphs 201 and 202 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 201). Whereas, Paragraph 202 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.
			2.16 Paragraph 203 requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.
			2.17 Paragraph 206 encourages opportunities for new development within, and within the setting of, Conservation Areas and World Heritage Sites, to enhance or better reveal their significance. It requires favourable treatment for proposals that preserve those elements of the setting that make a positive contribution to the asset or which better reveal its significance.
			2.18 Paragraph 207 notes that not all elements of Conservation Areas and World Heritage Sites will contribute to their significance, but that, if harm to their significance is caused, decisions should follow the balancing exercise set out in paragraph 201 and 202, as appropriate.

2 | Planning Legislation, Policy & Guidance

National Design Guide (September 2019)

- 2.19 In September 2019, the Ministry of Housing, Communities and Local Government (MHCLG) produced a National Design Guide illustrating how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance, alongside the separate planning practice guidance on design process and tools.
- 2.20 The Guide recognises that well-designed places have individual characteristics which work together to create its physical Character. It introduces 10 specific characteristics that would need to be considered when considering new development. These are:
- *Context* - An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments.
 - *Identity* - The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses.
 - *Built form* - Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics.
 - *Movement* - Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy. They also form a crucial component of urban character.
 - *Nature* - Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.
 - *Public spaces* - The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.
 - *Uses* - Sustainable places include a mix of uses that support everyday activities, including to live, work and play. They need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.
 - *Homes and buildings* - Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences.
 - *Resources* - Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve: mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and; adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.
 - *Lifespan* - Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their lifespan. They have an emphasis on quality and simplicity.
- 2.21 MHCLG further intend to publish a National Model Design Code, setting out detailed standards for key elements of successful design. This will intend to consider the findings of the Building Better, Building Beautiful Commission and recommendations to the Government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods.
- 2.22 The Guide acknowledges that quality design does not look the same across different areas of the country, for instance, that by definition local vernacular differs. MHCLG, therefore, expects that local planning authorities develop their own design codes or guides, taking in to consideration the National Model Design Code. These would be expected to set clear parameters for what good quality design looks like in their area, following appropriate local consultation.
- 2.23 In support of Paragraph 130 of the National Planning Policy Framework, which states requires local authorities to refuse "permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides."; MHCLG expects that in the absence of local design guidance, local planning authorities will defer to the illustrated National Design Guide and National Model Design Code.
- Planning Practice Guidance ("PPG") (Department for Communities and Local Government, March 2014)**
- 2.24 The guidance in the PPG supports the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.
- 2.25 Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic, defined as follows:
- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
 - historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- 2.26 The PPG emphasises in paragraph 007 the importance of assessing the nature, extent and importance of a heritage asset in understanding the potential impact and acceptability of development proposals.
- 2.27 Paragraph 018 explains that, where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. It goes on to state that whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.
- 2.28 Harm may arise from works to the heritage asset or from development within its setting. Setting is stated to include the surroundings in which a heritage asset is experienced, and may be more extensive than its curtilage. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.29 The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy, including paragraphs 193 to 196 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF. Public benefits include heritage benefits, and do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Local Development Plan

Ashford Local Plan 2030 (February 2019)

2.30 The Ashford Local Plan was adopted in February 2019. The following policies are relevant to this report:

Policy SP6 Promoting High Quality Design

2.31 Development proposals must be of high quality design and demonstrate a careful consideration of and a positive response to each of the following design criteria:

- Character, distinctiveness and sense of place
- Ease of movement
- Legibility
- Mixed use and diversity
- Public safety and crime
- Quality of public spaces and their future management
- Flexibility and liveability
- Richness in detail
- Efficient use of natural resources

Policy ENV2 The Ashford Green Corridor

2.32 This policy states that the ‘protection and enhancement of Ashford’s Green Corridor is a key objective’, and therefore:

- Development proposals within the Corridor designation (and proposed extensions) will be permitted if they are compatible with, or ancillary to, their principal open space use or other existing uses, and it can be demonstrated that the proposal would not cause significant harm to the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.
- Development proposals which do not meet the above criteria will not be permitted unless it would be in accordance with a site specific policy in the Ashford Local Plan; or where it relates to a) the redevelopment of a suitable brownfield site or b) delivers overriding benefits, and in either scenario, that it can be demonstrated that there would be

no significant harm to the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.

- Development proposals on land adjoining the Green Corridor shall provide suitable access and links to the existing movement networks of the adjoining Green Corridor wherever possible. They must not cause significant harm to any of the key features and functions, and should make a positive contribution to the Green Corridor in respect of its environment, biodiversity, visual amenity, movement networks or functioning and its setting.
- Development proposals must take into consideration the appraisals, projects, and management recommendations set out for the specific areas in the Ashford Green Corridor Action Plan, including the identified proposed extension areas to the designation.

Policy ENV13 Conservation and Enhancement of Heritage Assets

- 2.33 This policy states that the council will support proposals ‘which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character’.
- 2.34 Furthermore, ‘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’.
- 2.35 Development that ‘will cause loss or substantial harm to the significance of heritage assets’ will not be permitted, unless ‘it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss’. In the case of less than substantial harm to a designated or non-designated heritage asset, ‘harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset’.
- 2.36 Finally, this policy requires all applications which have the ‘potential to affect a heritage asset or its setting’ to 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 ENV14 Conservation Areas

- 2.37 This policy states that development or redevelopment proposals within Conservation Areas will be permitted provided that they ‘preserve or enhance the character and appearance of the Area and its setting’.
- 2.38 Development or redevelopment proposals within CAs should fulfil each of the following:
- a. The scale and detailed design of all new development and alterations should respect the historical and architectural character, proportion and massing, including roofscapes, of the area, the relationship between buildings, the spaces between them and with their setting;
 - b. The materials proposed should be appropriate to the locality and complement those of the existing buildings;
 - c. Buildings and streets of townscape character, trees, open spaces, walls, fences or any other features should be retained where they contribute positively to the character and appearance of the area;
 - d. The development should not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area;
 - e. The use should be appropriate to and compatible with the character, appearance and historic function of the area; and,
 - f. The development would not prejudice important views into or out of the conservation area.

Local Planning Guidance

- 2.39 Other key planning guidance documents which have been referred to for this report are:
- Ashford Town Centre Conservation Area Appraisal and Management Plan (2016)
 - Ashford Heritage Strategy (2017)

2 | Planning Legislation, Policy & Guidance

FORMER PLEDGE'S FLOUR MILL | ASHFORD

Historic Environment Good Practice Advice in Planning

2.40 To support the national policies, four separate Good Practice Advice in Planning Notes (GPA's) have been published by Historic England. The GPAs relevant to this report, GPA2 and GPA3, are summarised below. GPA 1 on the Historic Environment in Local Plans and GPA 4 on Enabling Development and Heritage Assets have not been included as they are not considered to be relevant to the proposed development.

GPA 2: Managing Significance in Decision-Taking in the Historic Environment [March 2015]

2.41 This document provides advice on numerous ways in which decision-taking in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured staged approach to the assembly and analysis of relevant information and is as follows:

- 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.

2.42 The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process in informed decision-taking.

2.43 The document sets out the recommended steps for assessing significance and the impact of development proposals upon it, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary.

GPA 3: The Setting of Heritage Assets (2nd Edition) [December 2017]

2.44 This advice note focuses on the management of change within the setting of heritage assets. It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, (2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).

2.45 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent 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. At the same time those taking decisions need enough information to understand the issues.

2.46 This note gives assistance concerning the assessment of the setting of heritage assets and the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings; and that settings can contribute to the significance of a heritage asset.

2.47 This note gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets. It suggests that, at the pre-application or scoping stage, the local authority, having due regard to the need for proportionality:

- indicates whether it considers a proposed development has the potential to affect the setting of (a) particular heritage asset(s), or
- specifies an 'area of search' around the proposed development within which it is reasonable to consider setting effects, or
- advises the applicant to consider approaches such as a 'Zone of Visual Influence' or 'Zone of Theoretical Visibility' in relation to the proposed development in order to better identify heritage assets and settings that may be affected.

2.48 Particularly for developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account of the possibility that setting may change as a result of the removal of impermanent landscape or townscape features, such as hoardings or planting.

2.49 This should be followed by an analysis to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.

2.50 The next stage is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

2.51 At the proposal stage, ways to maximise enhancement and avoid or minimise harm should be considered. Enhancement (see NPPF, paragraph 137) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one
- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting.

Section 3

Historic Development of the Site and Surroundings.

3 | Historic Development of the Site and Surroundings

FORMER PLEDGE'S FLOUR MILL | ASHFORD

Historic Development Summary

- 3.1 The former Pledge's Flour Mill, also referred to as Provender Mill or East Hill Mill, is located at the confluence of the East and Great Stour rivers, immediately south of an ancient bridge crossing in the town of Ashford. This is an important strategic location, as it creates the opportunity for dual-flow canalisation, which Pledge's Mill made use of. Though a watermill has likely been located on the Site since the Middle Ages, the surviving buildings date from the late nineteenth and early twentieth centuries, after ownership of the Site had been taken over by Henry Sturgess Pledge; the earlier buildings, including Provender Mill and Mill House, were destroyed in a catastrophic fire in May 1974 (figures 3.1 - 3.6). The mill had ceased operation two years prior, in 1972. From 1981 until 2011, the surviving mill buildings were used as a nightclub. The Site was then purchased by Ashford School, and, following two years of negotiation, sold on to Oliver Davis Homes in early 2021.
- 3.2 It appears that East Hill Mill was the only watermill in Ashford, with others being powered either by wind or, later, steam. Until 1804, when it was sold at auction, the mill formed part of the Manor of Ashford.

Detailed Historic Development

- 3.3 There has been a settlement along the river at Ashford since at least 893 AD. The town, which is located on a rise in the land of the Stour valley, is at the crossing point of several important routes: a Roman road linking Tenterden to Canterbury (along the line of the current Beaver Road and Station Road), and a route along the base of the Downs, leading to Maidstone in one direction and Hythe in the other.¹ Ashford was large enough to be recorded in the Domesday Book (as Essetesford), with a population of 21 households, 1 church, and 2 mills.² It is highly likely that one of these mills was located on the Site.
- 3.4 Given its junction location, it is not surprising that Ashford became an important market town from the thirteenth century onwards; the first market charter was granted to Simon de Criol in 1243.³ Ashford

1 Ashford Borough Council and Tony Fullwood Associates. 'Ashford Town Centre: Conservation Area Appraisal and Management Plan', 2016., p. 11

2 'Ashford', Open Domesday Online.

3 Arthur Ruderman, *A History of Ashford* (Chichester: Phillimore & Co Ltd, 1994), p. 115.

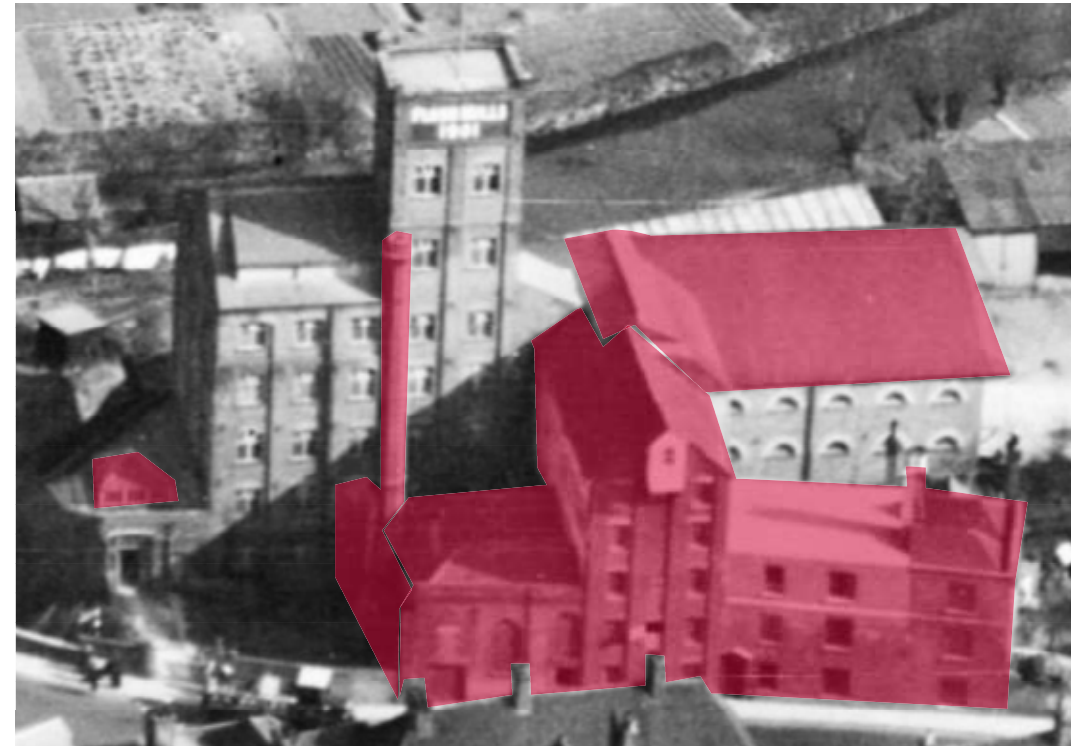


Figure 3.1 1929 aerial photograph of Pledge's Mill from the west, portions destroyed in the 1974 fire highlighted in red
Source: Britain from Above



Figure 3.2 Photograph taken in 1962. In the foreground are (left to right) 'Provender Mill' and Mill House
Source: Historic England Archive, image license pending

3 | Historic Development of the Site and Surroundings

FORMER PLEDGE'S FLOUR MILL | ASHFORD



Figure 3.3 1941 photograph of (l to r) the Engine House, 'Provender Mill', and part of Mill House
Source: Historic England Archive, image license pending



Figure 3.4 The Engine House, 'Provender Mill', and Mill House in 1962.
Source: Historic England Archive, image license pending



Figure 3.5 View of the rear of Mill House and 'Provender Mill' in 1970
Source: Historic England Archive, image license pending



Figure 3.6 Looking north towards Pledge's Mill in 1970
Source: Historic England Archive, image license pending

3 | Historic Development of the Site and Surroundings

developed in a linear fashion along the main east-west highway through town, High Street, down to East Hill and the ancient bridge crossing (adjacent the Site). The Site was therefore on the outskirts of town.

- 3.5 The Manor of Ashford, which included the Site, was granted to the Dean and Canons of the Chapel of St Stephen, Westminster, by King Richard II in 1382. The Dean and Canons were likely responsible for the alteration and improvement of the River Stour, including the so-called Lord's Cut. The East and Great Stour rivers originally joined higher upstream (to the south), but to improve and regulate the flow of water to East Hill Mill, an artificial cut (the 'Lord's Cut') was made, creating the stretch on the western side (see figure 3.7).⁴ Due to a lack of documentary evidence, it is unclear when exactly this improvement took place, but local historian Arthur Ruderman (1922-2009) posited that the Lord's Cut was made at the end of the fifteenth century.⁵
- 3.6 In 1556, after the Dissolution of the Monasteries, a Title Deed was produced as part of the transfer of the manor estate to Sir Andrew Judde of London.⁶ One of the buildings listed in the Deed's schedule of landholdings is a watermill (molendinum) in Ashford, which would almost certainly have been located on the Site.
- 3.7 Ashford, which had continued to expand gradually throughout the sixteenth and seventeenth centuries, remained a local centre in the eighteenth. It was the meeting point for new turnpike roads constructed across Kent between 1762 and 1795.
- 3.8 The first known map depiction of the Site is in Dury and Andrews 1768-9 map of Kent, which depicts an L-shaped building over the river Stour (figure 3.8). These are the buildings shown in the foreground of figure 3.2. The mill, often referred to as Provender Mill in historic documents, was a narrow, rectangular building, 5 storeys in height. Adjoining it was a two- and three-storey range, Mill House, the frontage of which followed the curve of the street.
- 3.9 In August 1804, several freehold estates belonging to the manor of Ashford, including the mill, were sold at auction. Sold in Lot 5, the Mill is described in the auction catalogue as 'a Capital Water Corn-Mill, with

2 Pair of French Stones and 4 Floors, advantageously situated for Trade, at the bottom of Ashford Town, on a regular Stream well supplied with Water, and capable of grinding 30 Quarters of Corn per Week, with a neat Dwelling House adjoining, containing a small entrance Hall, Parlour, Kitchen, and Scullery, two good Bed Chambers and two neat Garrets'.⁷ Lot 5 also included a garden, paddock, and, across the road, 'a Stable for four Horses... with a Lodge for a Wagon [sic] and Cart'.

- 3.10 The auction catalogue notes that the building was currently under a 14-year lease (1798-1812) to a Mr John Hutton, at a yearly rent of £52:10:0. The reason for 'the present low rent' was the 'considerable Sum of Money' Hutton had spent on 'improvements of the Mill and Premises'.⁸
- 3.11 In all likelihood, one of the improvements made by Hutton was the refronting of Provender Mill and Mill House in brick, which would have modernised the public faces of these timber-framed buildings in line with current fashions favouring the classical. Only the two elevations which would have been visible to passers-by leaving Ashford were refronted: figure 3.4 shows that the north-eastern elevation of Provender Mill was weatherboarded. Furthermore, only the front half of the mill's south-western elevation was re-fronted in brick (figure 3.5).
- 3.12 It appears that John Hutton was the one who purchased the mill in the 1804 auction, because the 1843 Tithe Map of Ashford names a John Hutton as the owner and occupier of the Site (consisting of the mill, stable and yard, garden, and pasture).⁹
- 3.13 During the nineteenth century, Ashford's population grew from about 2000 in 1801 to nearly 13,000 at the end of the century.¹⁰ A large proportion of this increase was linked to the coming of the railway in 1847. The South Eastern Company established its main workshops at Ashford, transforming it 'from a town dependent largely on its agricultural market into an industrial town, with a large proportion of the population dependent, directly or indirectly, on the railway for its livelihood'.¹¹

7 Sales Particular, Manor of Ashford, 1804, Kent Archives, catalogue no U55/SP/304.
8 Ibid.
9 Tithe Map of Ashford, 1843, accessed via the Genealogist.
10 Ruderman, *A History of Ashford*, p. 65.
11 Arthur Ruderman and Richard Filmer, *Ashford: A Pictorial History* (Chichester: Phillimore & Co Ltd, 1991).

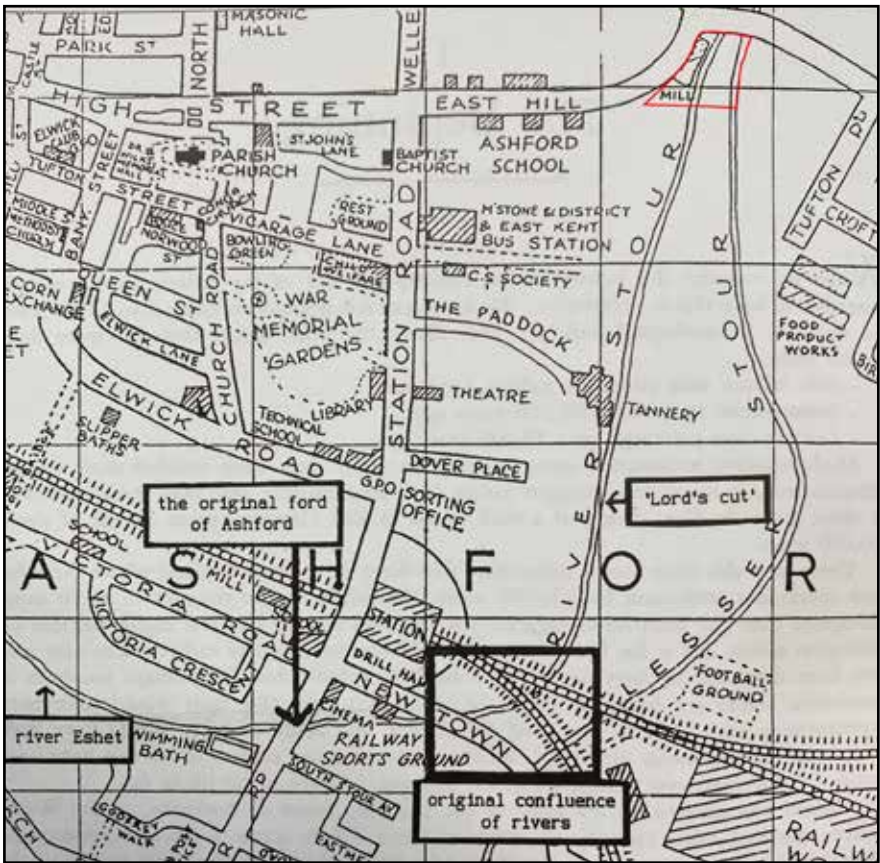


Figure 3.7 1935 plan of Ashford showing original ford and river course. Approx. Site location outlined
Source: Arthur Ruderman, *A History of Ashford*, p. 2



Figure 3.8 Dury and Andrews' 1768-9 Topographical Survey of Kent, showing Ashford. Approx. Site location outlined
Source: Kent Archives

4 Ibid, p. 18.
5 Ibid.
6 'Manor of Ashford', 1556, Kent Archives, catalogue number U386/T40.

3 | Historic Development of the Site and Surroundings

3.14 Between 1804 and 1871, when the first Ordnance Survey (OS) Map of the Site was published (figure 3.9), an Engine House was built immediately northeast of Provender Mill, making the buildings' footprint t-shaped. The 1871 OS map also shows that a circular tank was located to the rear of the Engine House. The Site was still at the edge of Ashford. However, suburban streets with terraced housing had begun to be laid out to the east, on either side of Hythe Road, and a row of terraced housing had also been built on the island.

3.15 The next OS map of the Site was published in 1898 (figure 3.10), and by this time, the circular tank had been demolished. It is around this time that the Site likely passed into Henry Sturgess Pledge's ownership.

3.16 H.S. Pledge (1838-1903) is said to have learned his trade at the Black Mill, a windmill near Canterbury. By 1881, Pledge was running the Kennington Mill, east of Ashford, which remained in his ownership until 1892. Pledge appears to have founded his extremely successful business, H.S. Pledge and Sons Ltd, in the early 1890s. During this decade, he took ownership of the Site, and also began the construction of Victoria Mill, on the southern side of Ashford, adjacent the railway. Around 1901, Pledge built a flour mill and warehouse on the Site, behind the old mill buildings.

3.17 Historic photographs and a comparison of the 1898 and 1907 OS maps (figures 3.10 and 3.11) show that H.S. Pledge's building work on the Site constituted extensions, rather than demolition and rebuilding programmes. Thus, the flour mill and warehouse were built against, and contained links into, the older mill buildings. South of the mill, Pledge also built a bridge over the Great Stour, providing a direct access route to the warehouse and a cluster of newly constructed outbuildings.

3.18 One thing that was self-evidently important to Pledge was that his new business had presence, using its architecture to make clear to passers-by the arrival of his new business. Thus, East Hill Mill was provided with a prominent tower at its northern end, in the mill building, with signage oriented east and west, to catch the eye of those leaving, or arriving in, Ashford from the east. At this point in time, Hythe Road, arriving in Ashford from the east, did not continue east, as the A292 does now, but instead hit the western garden wall of Alfred House (now Ashford School), and turned south and west, around the East Hill Mill, into Ashford.

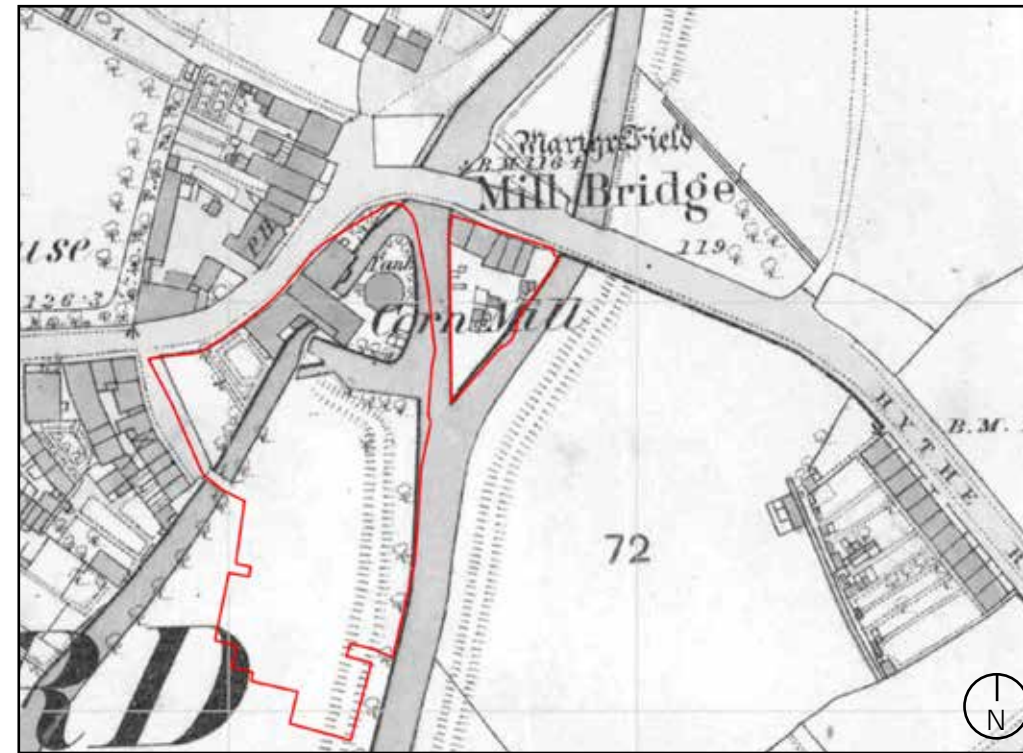


Figure 3.9 1871 Ordnance Survey Map of the Site (outlined in red)
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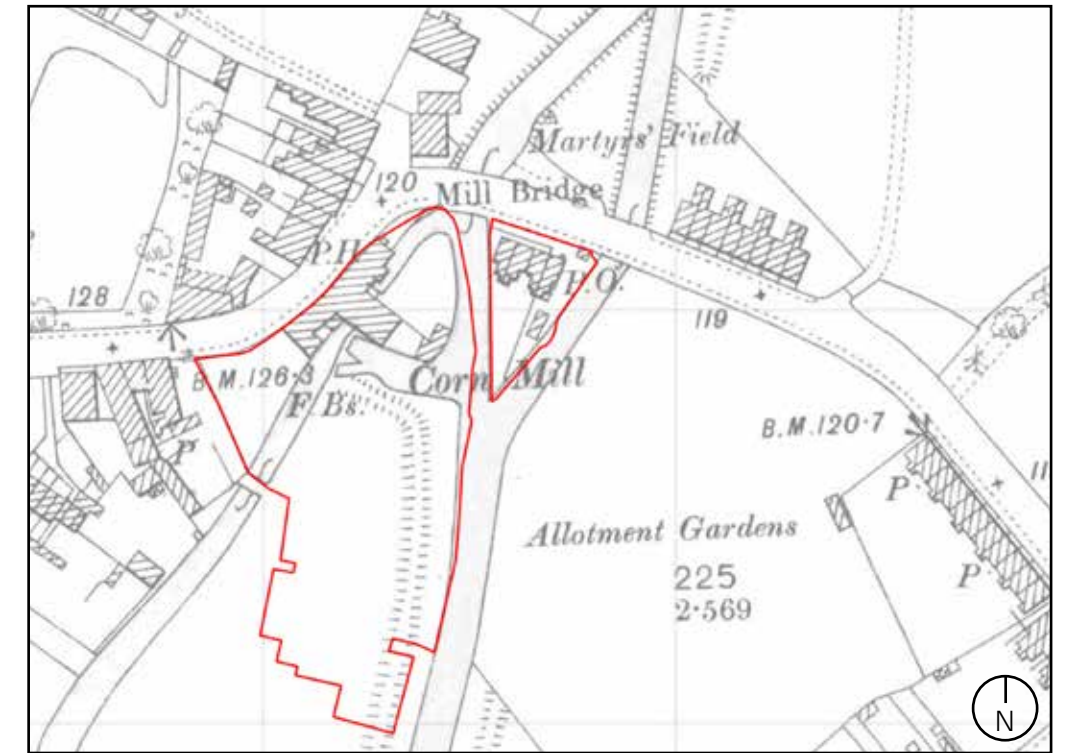


Figure 3.10 1898 Ordnance Survey Map of the Site (outlined in red)
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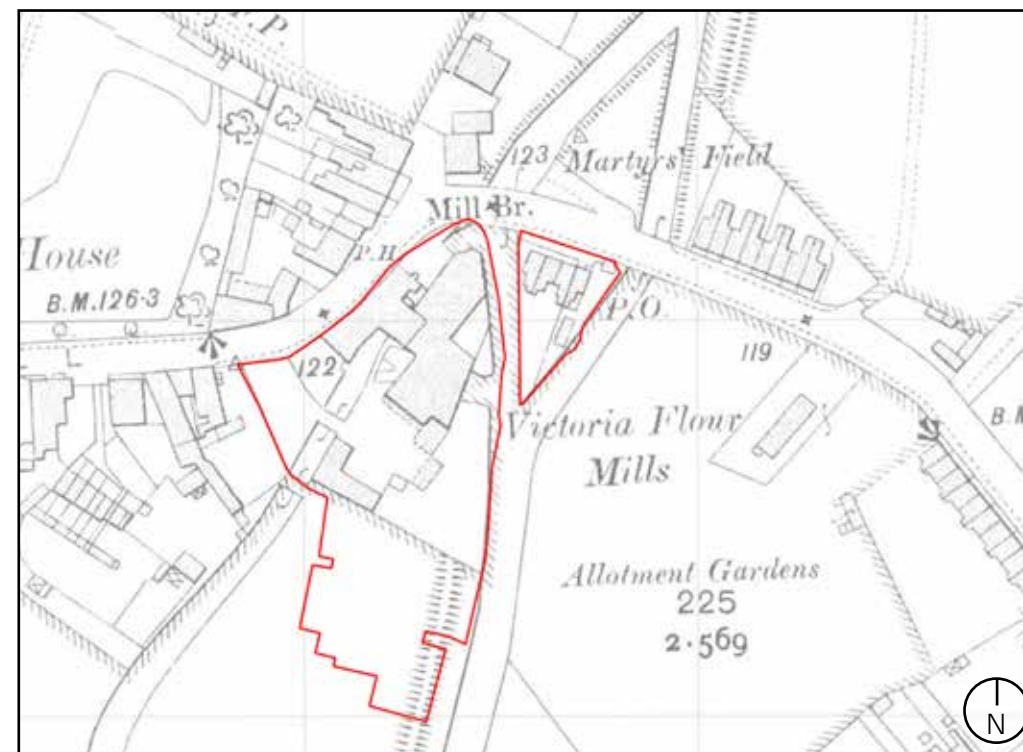


Figure 3.11 1907 Ordnance Survey Map of the Site (outlined in red)
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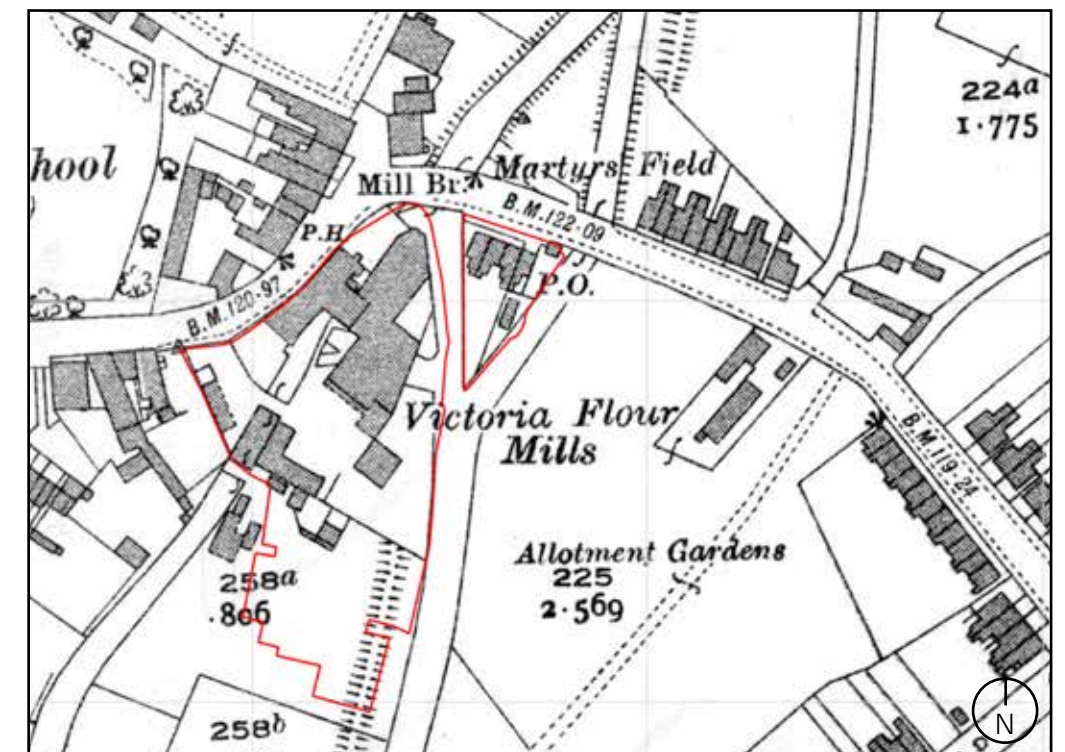


Figure 3.12 1931 Ordnance Survey Map of the Site (outlined in red)
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3 | Historic Development of the Site and Surroundings

- 3.19 There was little development to the north and south, and it is important, particularly, to note that at this date, the mill sat outside Ashford proper, which at this point was a settlement that remained focused around its High Street. It is therefore no surprise that the 1901 tower at East Hill Mill had the orientation and signage that it did. It signalled the arrival of travellers into Ashford, and ensured that almost the first interaction one had with the town was with the brand of H.S. Pledge and Sons.
- 3.20 After the completion of the flour mill and warehouse, no major changes to the buildings on the Site are visible on OS mapping until the May 1974 fire. The Site's surroundings changed markedly, however, as a result of the construction of a bypass to the north (figure 3.16), in order to ease congestion along the steep and narrow East Hill, which had been a problem since the 1920s. To accomplish this, the terrace on the western side of East Hill, opposite the Site, was demolished, making the flour mill building, with its tower, even more prominent within the townscape. The row of terraced housing on the island east of the mill buildings was also demolished.
- 3.21 East Hill Mill continued to be run by the Pledge family until its closure in 1972. The fire occurred in May 1974, possibly due to arson, and was catastrophic (see figures 3.1 and 3.14-3.15). Though the oldest portions of the mill buildings, which were timber-framed, as well as the Engine House, were destroyed, firemen were able to save Pledge's additions: the flour mill, its tower, and the walls of the warehouse. After the fire, the surviving, derelict mill buildings sat empty until 1981, when they were converted into a nightclub, Dusty's and the Jolly Miller. A four-storey extension was added east of the junction of the flour mill and warehouse, in the location of the links to Provender Mill (see figure 3.17), and the warehouse was re-roofed and converted into a nightclub. Portions of the flour mill's upper floors were also converted into apartments. A blockish two-storey brick extension was added at the southeastern corner of the warehouse. The outbuildings south of the mill and warehouse, built in the early twentieth century, were demolished in the 1980s, and the southern portion of the Site became a car park.
- 3.22 Until 2011, a succession of nightclubs operated on the Site: Cales and Flatfoot Sam's (1990-2002), and Liquid and Life, later Liquid and Envy (2002-2011). In 2011, Ashford School purchased the Site, and

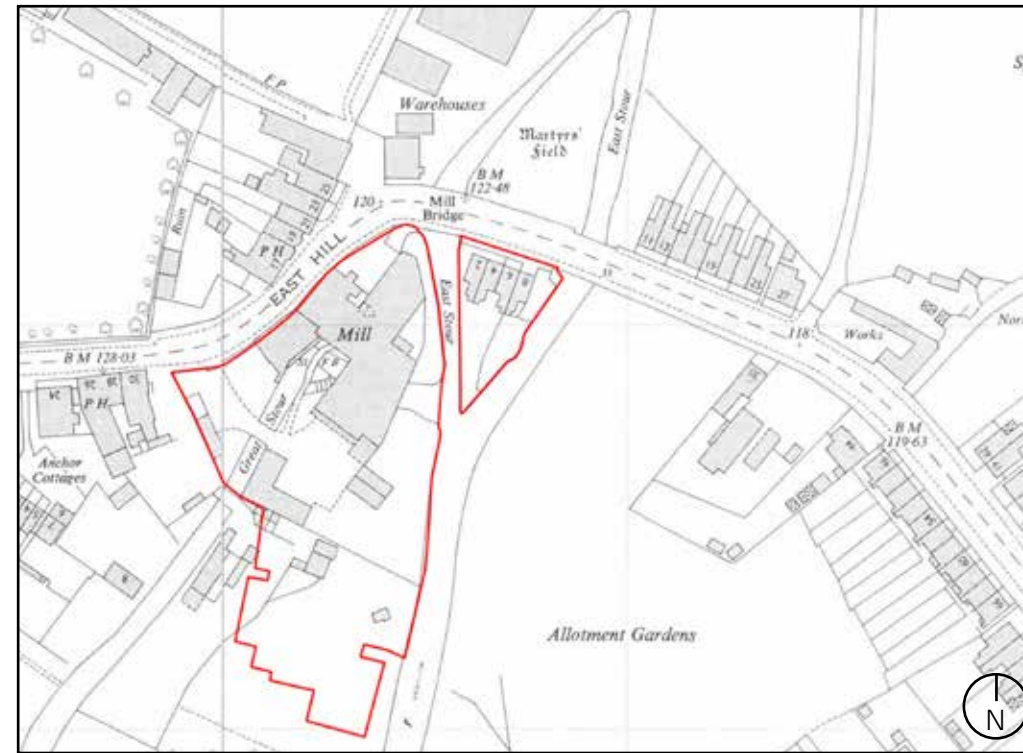


Figure 3.13 1958 Ordnance Survey Map of the Site (outlined in red)
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Figure 3.15 View of the Engine House and Provender Mill during the May 1974 fire
Source: Kentish Express Ashford & District



Figure 3.14 Pledge's Mill photographed during the May 1974 fire
Source: Kentish Express Ashford & District

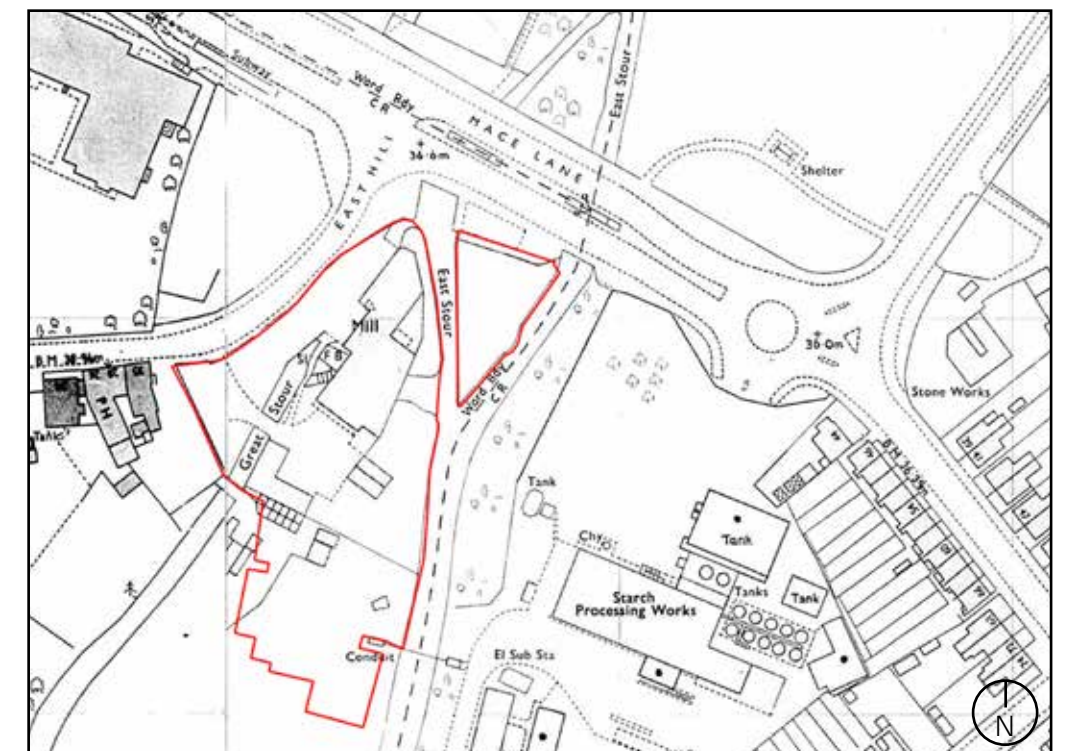


Figure 3.16 1977-8 Ordnance Survey Map of the Site (outlined in red)
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3 | Historic Development of the Site and Surroundings

the nightclub was closed. Several options for the redevelopment of the Site were considered, including its conversion into a performing arts centre for the school. Ultimately, however, the decision was made to release the Site from Ashford School's estate, and in 2021, it was sold to Oliver Davis Homes.



Figure 3.17 Pledge's Mill in 1980. Note the links which would have connected the flour mill and warehouse with Provender Mill
Source: Kentish Express Ashford & District



Figure 3.18 Pledge's Mill in 1981, showing the new roof of the warehouse under construction
Source: Kentish Express Ashford & District

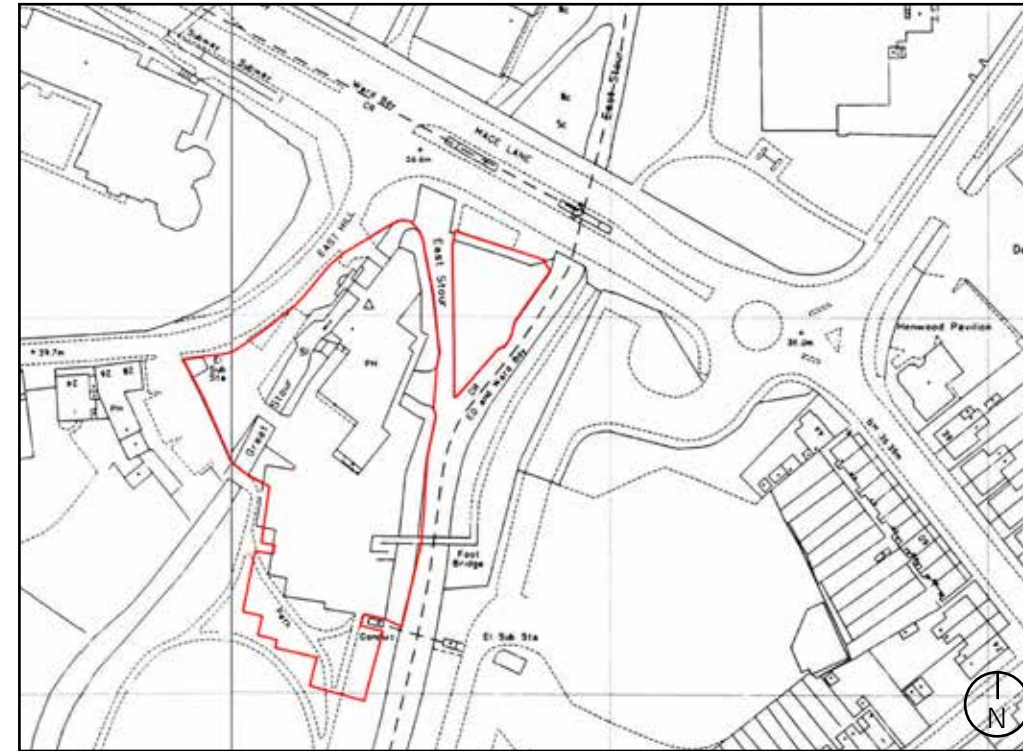


Figure 3.19 1992 OS Map of the Site (outlined in red)
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Figure 3.20 1992 OS Map of the Site (outlined in red)
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Section 4

Site Description and Identification of Heritage Assets.

4 | Site Description and Identification of Heritage Assets

FORMER PLEDGE'S FLOUR MILL | ASHFORD

Site Location and Description

- 4.1 Part of the Site is located within the eastern edge of the Ashford Town Centre Conservation Area and contains the Former Pledge's Flour Mill (non-designated heritage asset). The Site is crossed by the Great Stour and East Stour Rivers, and can be divided into two main sections: an oblong plot bordered to the west by East Hill Road, which contains the former mill buildings, and, to the east, the southern half of an island within the East Stour River. This island (figure 4.3), which is bisected by the A292 bridge (the Site's northern boundary), contains no buildings and is currently overgrown with vegetation (outside of the conservation area boundary). It is connected to the rest of the Site via a narrow footbridge. The Great Stour River flows north-south between the former mill buildings and East Hill Road. The southernmost portion of the Site is dominated by car parking, also outside of the conservation area boundary (figure 4.4).
- 4.2 The Site is bounded to the north by the A292, to the west by East Hill, and to the east by the East Stour. The Site's southern boundary is formed by North Park. The offices of Ashford Borough Council are approximately 160 metres south of the Site.
- 4.3 The existing buildings on the Site are the former flour mill, 5 storeys plus attic level, with a 7-storey tower, built 1901; a contemporaneous two-storey warehouse with a metal barrel-vaulted roof (a 1981 replacement, renewed 2003, as the original roof was destroyed during the 1974 fire); and a 1981 extension in the location of Provender Mill, which is 4 storeys plus attic level, and contains the main staircase of the former nightclub. Externally, the principal building materials are red brick, with gault brick used for window headers.

Former Pledge's Flour Mill

- 4.4 The former Pledge's Flour Mill was built on a small man-made island, created when a channel was dug to connect the East and Great Stour. On the ground floor, the northern portion of the building is angled, following the line of the river. From the first floor on, the building is rectangular in shape. The windows are segmental, and separated by brick pilaster strips. The roof is gabled, with an asymmetrical pitch (see figure 4.5).



Figure 4.1 View of the Site from East Hill



Figure 4.2 View of Pledge's Mill from the east



Figure 4.3 The island



Figure 4.4 Looking northeast towards the former mill from the car park

4 | Site Description and Identification of Heritage Assets

FORMER PLEDGE'S FLOUR MILL | ASHFORD

- 4.5 One of the former flour mill's most notable features is its 7-storey tower, which includes the prominent lettering 'H.S. Pledge & Sons Ltd Flour Mills 1901' at parapet level on the east and west elevations, clearly designed to catch the attention of passers-by travelling along East Hill and Hythe Road (now Mace Lane), historically the main eastward route out of Ashford.

Former Warehouse

- 4.6 This building dates from between 1898 and 1908, and is two storeys tall, with a barrel-vaulted metal roof. Though it had to be largely rebuilt after the fire, the former warehouse largely retains its east, west, and south walls, which appear to have been constructed in a local handmade brick, with a slate damp course. A channel connecting the East and Great Stour Rivers runs beneath the building. The warehouses' eastern wall is splayed, as it was built to follow the course of the East Stour, therefore increasing the building's footprint.
- 4.7 The building's windows are located on the east and west elevations. Judging by historic photographs of the warehouse (figure 3.1), it appears that these were all originally semi-circular. With the exception of the first floor windows on the west elevation, most of the windows have been enlarged or changed into doors. This most likely occurred when the warehouse was being converted into a nightclub. The barrel-vaulted metal roof is also a modern replacement (the original one was destroyed during the fire). The blockish two-storey red brick extension with a flat roof at the southeast corner of the warehouse was added in the early 1980s.

1981 Extension

- 4.8 Built at the junction of the flour mill and warehouse, in the location of Provender mill, the 1981 brick extension contains the nightclub's main staircase.
- 4.9 It is immediately south of the former flour mill, and east of the warehouse. The extension is four storeys tall (plus attic), with a gabled roof and dormer window. The west elevation, which faces East Hill, is two bays wide. The left bay contains three round-headed windows; the bottom one, which lights the staircase, extends across two storeys. The right bay is blank.



Figure 4.5 View of Pledge's Mill from the north. The footbridge to the island is on the left. Lift shaft (front right) added in the 1980s.



Figure 4.6 One of the former club entrances, flour mill building



Figure 4.7 The 1981 extension, viewed from East Hill
Source: Google

4 | Site Description and Identification of Heritage Assets

FORMER PLEDGE'S FLOUR MILL | ASHFORD

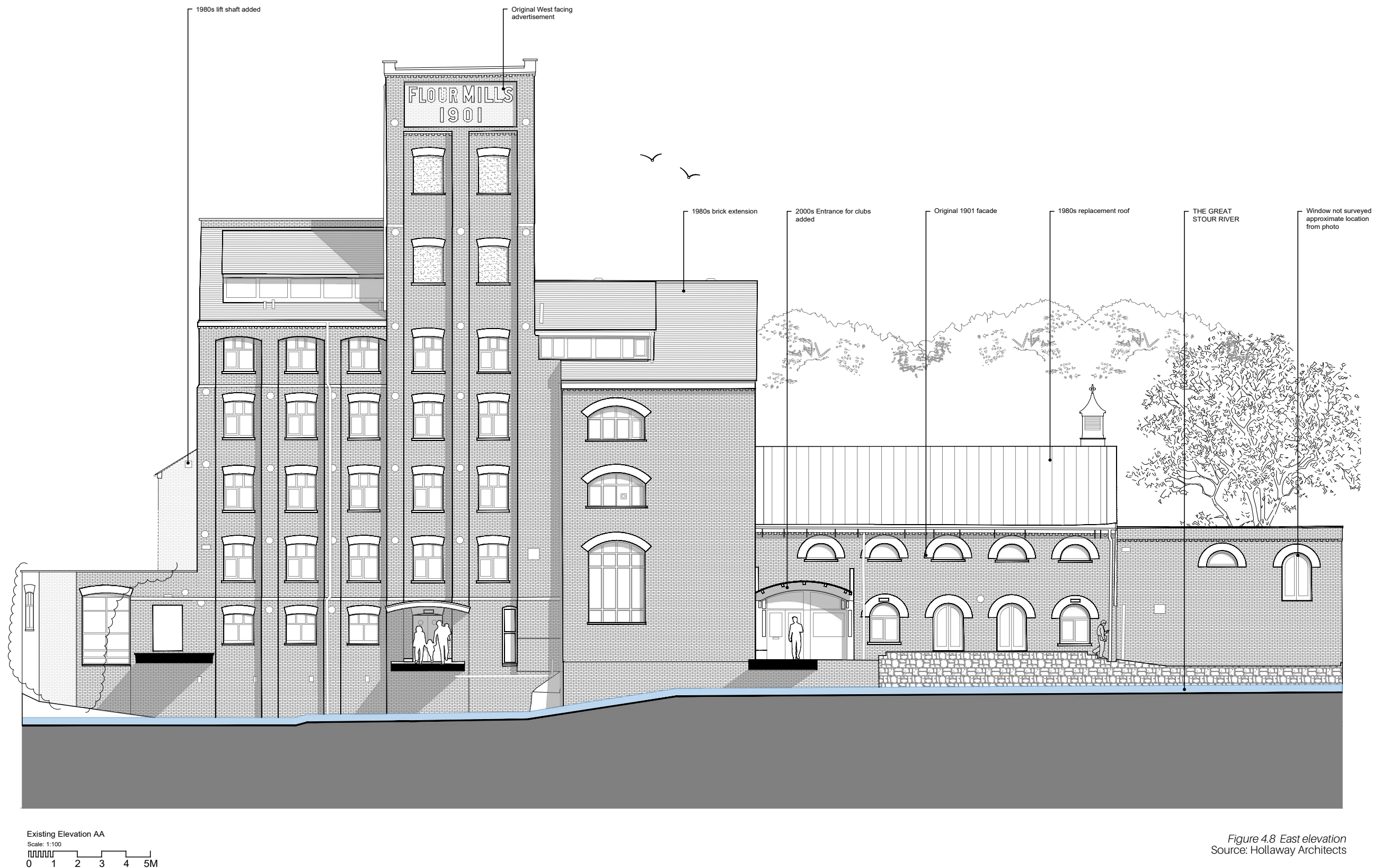


Figure 4.8 East elevation
Source: Hollaway Architects

4 | Site Description and Identification of Heritage Assets

FORMER PLEDGE'S FLOUR MILL | ASHFORD

Interior

- 4.10 The interiors of the former warehouse and flour mill have been significantly altered, and as a result, the remaining evidence of the mill buildings' original function is only fragmentary, making it difficult to understand how they functioned historically.
- 4.11 In the former flour mill, there are two openings for two floor hatches, and in places there is evidence of former wall fixings, potentially for some form of internal hoist, but no further evidence of interest is observable. All of the milling machinery has been removed.
- 4.12 In the former warehouse, some of the cast iron columns appear to be from the first phase, but otherwise, no historic fabric is visible internally.



Figure 4.9 Ground floor interior of former warehouse



Figure 4.10 Former VIP section, first floor of the former flour mill



Figure 4.11 Former mill building - upper floor interior



Figure 4.12 Former mill building - upper floor interior

4 | Site Description and Identification of Heritage Assets

FORMER PLEDGE'S FLOUR MILL | ASHFORD

Identification of Heritage Assets

4.13 Within 100m of the Site, there are 2 grade II listed and 1 grade II* buildings. These have the potential to be impacted by the proposed development. The former mill buildings on the Site are located within Ashford Town Centre Conservation Area and are considered to be a non-designated heritage asset. The existing car park and island are outside of the Conservation Area boundary.

Grade II* Listed Buildings

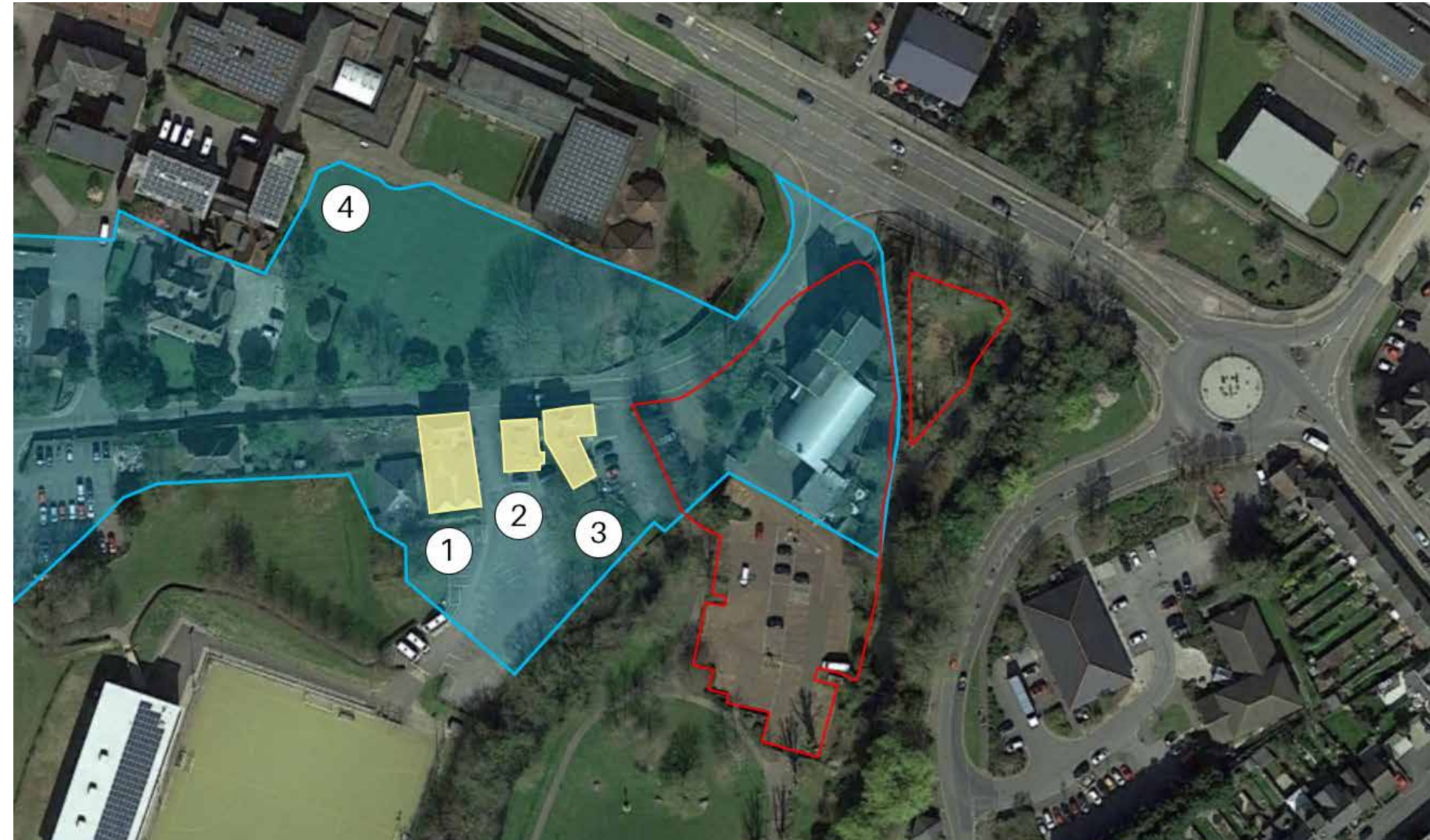
1. Bridge House

Grade II Listed Buildings

2. Northside
3. The Star Inn

Conservation Areas

4. Ashford Town Centre Conservation Area



Section 5

Assessment of Significance.

5 | Assessment of Significance

Assessment Methodology

- 5.1
- The assessment methodology used here for assessing the significance of the identified heritage assets and their settings is as set out in Annex 2 of the National Planning Policy Framework. This proposes the use of three heritage interests – historical, archaeological, and architectural and artistic – in assessing what makes a place and its wider context special. The definitions for these interests are included in the online Planning Practice Guidance:

 - Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
 - Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

- 5.2
- These interests are also used in the November 2017 consultation draft of Historic England’s best-practice guidance document, Conservation Principles. They replace the heritage values – evidential [now archaeological], historical, aesthetic [now architectural and artistic], and communal [now part of historical] – set out in the previous, 2008 version.
- 5.3
- The level of value is assessed using five criteria: high, medium, low, neutral, and negative.

 - 1. High – the element is critical to understanding of significance.
 - 2. Medium – the element is important to understanding of significance.
 - 3. Low – the element makes some limited contribution to understanding of significance.
 - 4. Neutral – the element is not negative, and could be enhanced to make a positive impact of the understanding of significance.
 - 5. Negative – the element is harmful or intrusive and detracts from the understanding of significance.

Former Pledge’s Flour Mill (non-designated heritage asset)

- 5.4
- The Site is of local historic interest, with a history of milling stretching back to at least the medieval period, if not before the Domesday Book (1086). Due to the Site’s historic associations with milling, it has been included in Ashford’s ‘industrial belt’ in the Ashford Heritage Strategy. In addition, the company H.S. Pledge & Sons, which owned the Site for over 70 years, was a major employer and an important local business. As such, the surviving former flour mill buildings on the Site are considered to be a non-designated heritage asset of local importance only and positive contributor to Ashford Town Centre Conservation Area.
- 5.5
- However, in terms of historic fabric, the most significant portions of the mill buildings were destroyed during the 1974 fire. The parts of the mill that survive date from the late nineteenth and early twentieth centuries, when the Site was under the ownership of H.S. Pledge. Though the mill’s sluice gates survive, the milling machinery has been removed from the interiors, which have been significantly altered. As a result, there is very little that remains within the building which is of historical interest; instead, the building envelope provides almost all features of note.
- 5.6
- Furthermore, the modern extensions to the buildings, added after the 1974 fire, fit poorly with the proportions of the surviving historic buildings, and therefore detract from the Site’s significance. In particular, the four storey extension between the former flour mill and warehouse has an incongruous appearance due to the large amounts of blank brick wall, and spacing and sizing of its windows.

- 5.7
- Nevertheless, the exteriors of the two historic mill buildings which survived the fire, the flour mill and warehouse (both from c. 1901), do hold some limited architectural interest, a fact that is reflected in their status as non-designated heritage assets. In the case of the warehouse (much of which had to be rebuilt following the fire), the interest of the surviving brick walls is very limited due to their functional appearance and level of alteration, albeit the east and west walls are splayed to follow the curve of the river, a feature of note.
- 5.8
- The most significant surviving building on the Site is H.S. Pledge’s former flour mill, identified as a local landmark in the Ashford Town Centre Conservation Area Appraisal. The building, with its seven storey tower and lettering identifying the firm, was clearly designed to attract attention and be a prominent part of the townscape.
- 5.9
- In short, though the historic buildings on the Site are of some limited architectural interest, the Site’s principal significance lies not in the interest of its fabric, but in its historic association with milling at the Site and the townscape value of the former Pledge’s Flour Mill, in particular the tower. Historically, there was more built form on the Site, particularly along East Hill and part of the wider mill complex, but these structures were destroyed during the 1974 fire. The buildings that survive are from the mill’s last major building phase at the turn of the twentieth century, and, as a result of the fire and building of the bypass north of the Site (which necessitated the demolition of terraces east and west of the Site), appear somewhat isolated. Given the historic precedent for more built form on and around the Site, greater street presence along East Hill through the addition of high-quality new buildings would enhance both the Site and Ashford Town Centre Conservation Area.

5 | Assessment of Significance

Ashford Town Centre Conservation Area

5.10 Ashford Town Centre Conservation covers over 20 hectares of the town centre, including St Mary’s Church and the square adjoining, North Street, Bank Street, High Street, and East Hill (down to the river Stour). The CA boundaries were slightly reduced in 2016. This Conservation Area is centred around Ashford’s historic core and contains a large number of listed and locally listed buildings which demonstrate the historic development of Ashford, as such is considered to be of medium significance.

Contribution of the Site to significance

5.11 The former flour mill is identified as making a townscape contribution within the CA. In Map 7 - Town Centre Key Features (p. 22), the mill is highlighted as a notable local building, and the view towards it from the top of East Hill is identified as important.

5.12 East Hill, the Character Area within which the Site is located, is at the eastern periphery of the CA, and defined by the steep slope of East Hill down to the River Stour. Its boundaries were slightly reduced in 2016, wrapping around the Site.

5.13 On page 58 of the CA Appraisal and Management Plan, the former mill building is assessed as follows:

‘The flour mill dominates the character of the eastern edge of the Conservation Area. Despite the unfortunate brick side extension, the towering scale, historic value and prominent siting within the Stour valley make the flour mill a notable local building.

‘The river is a key feature of the mill’s setting (visually and audibly). The heritage engineering features of the mill’s sluice gates add interesting richness and character.’

5.14 In para 9.1.11 of the Ashford Heritage Strategy, the mill is also identified as part of Ashford’s ‘industrial belt’, which originated around the eleventh century and surrounds the town’s medieval core (p. 101). Though many of the industries supported by this industrial belt, ranging from milling to brickworks, are no longer extant, and remain only in memory, the industrial belt nonetheless ‘serves as the connective thread between the borough’s rural and urban industries’, and is identified as being of ‘general moderate significance’ nationally, with ‘considerable

regional significance especially in terms of its aesthetics’ (para 9.1.11, p. 101). The former mill therefore makes a limited, local contribution to the wider conservation area due to its historic association with this ‘industrial belt’ which is no longer extant.

5.15 Aside from the former flour mill building, the Site appears somewhat disparate as a result of the fire and successive, inappropriate alterations. The loss of the early mill buildings in the 1974 fire has left a set-back in the street frontage of the curve of East Hill. This part of the frontage now contains the 1980s extension and functional warehouse facade which do not contribute to the townscape appearance of this frontage - the 1980s facade being a detractor in its bulk and form. Similarly, the wider Site which has been purposefully excluded from the Conservation Area boundary - for example the car park - do not contribute to setting, character and appearance and there is scope for enhancement here.

Summary

5.16 In summary, the Site’s main contribution to the CA is derived from the tower’s townscape value and the Site’s association with historic milling, rather than the heritage significance of the buildings themselves: the fabric’s significance has been heavily affected by the catastrophic 1974 fire, and subsequent (unsympathetic) extensions and alterations. As a result of the fire, the surviving buildings on the Site, which were previously part of a compact grouping along East Hill, became somewhat isolated. Reinstating some of the massing on the Site through high-quality new buildings could therefore benefit the townscape character of the Conservation Area.

5.17 In addition, there is a clear opportunity to enhance both the character and appearance of the CA through the removal of the ‘unfortunate’ 1980s extension, enhancing the wider Site (such as the appearance of the car park) and by securing the building’s viable long-term use.

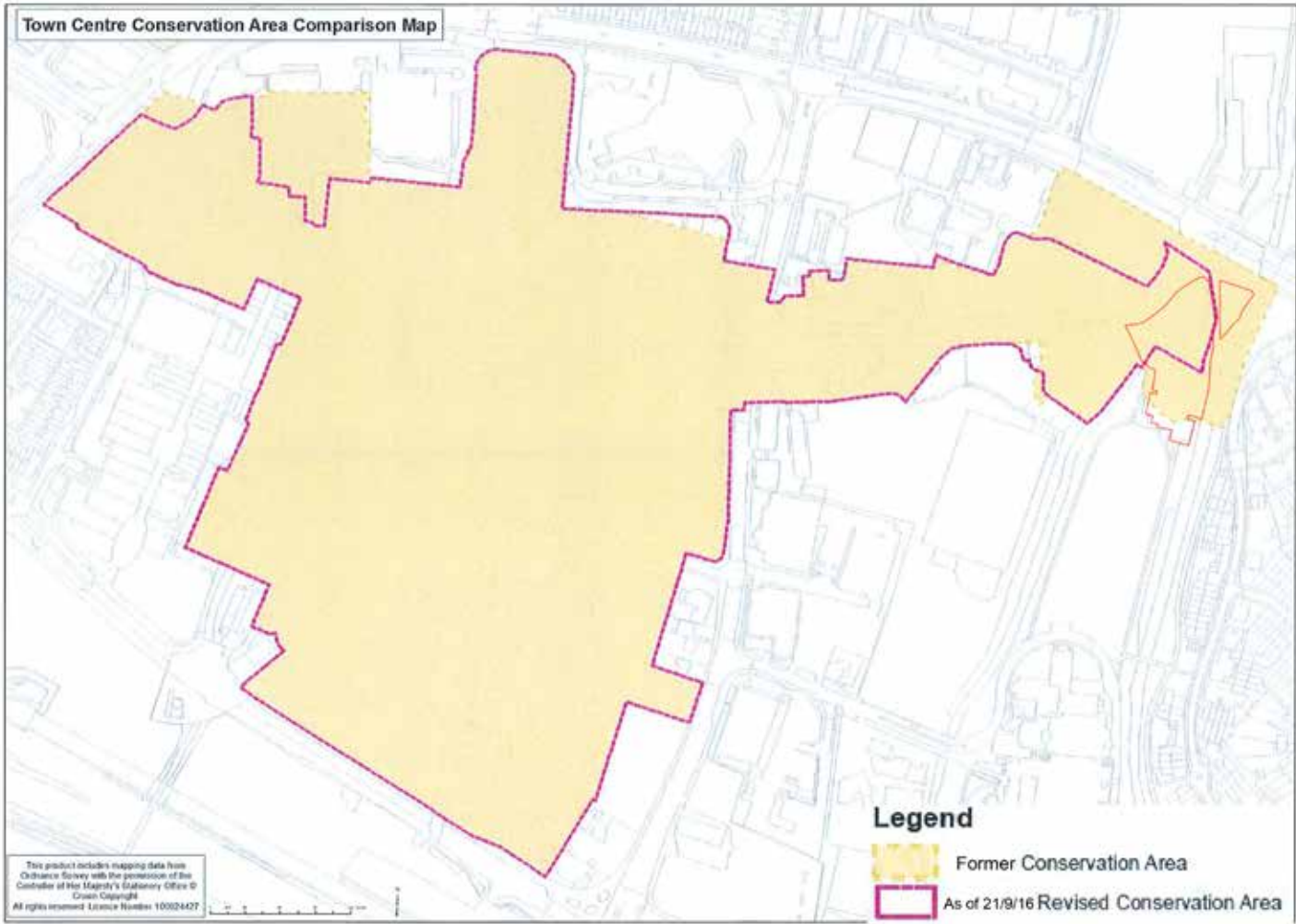


Figure 4.13 Comparison Map showing the old and revised boundaries of Ashford Town Centre Conservation Area

5 | Assessment of Significance

Bridge House

- 5.18 Bridge House, which was listed grade II* on 24 September 1951, is a red brick townhouse built between c1720 and 1760. When built, Bridge House would have been at the edge of Ashford. It is located on East Hill.
- 5.19 Bridge House is 3 storeys tall, with a hipped plaintile roof with moulded timber eaves cornice. The house has a stone foundation. Originally, it was likely a single-pile building, two rooms wide with a central staircase, though it has since been extended to the rear. The principal elevation faces East Hill.
- 5.20 Being a grade II* listed building, Bridge House's significance is medium-high, lying in its historic and architectural interest.
- 5.21 The list entry notes that Bridge House forms a group with the garden wall to its west, Northside, and the Star Inn. These heritage assets therefore have group value and contribute to its setting. Though Ashford has significantly expanded, particularly in the last two centuries, the loosely clustered grouping and domestic scale of these three buildings, and the long stretches of brick walls either side of the narrow, curved street, has allowed the area to retain its edge-of-town quality.
- 5.22 The Site is in the wider setting of Bridge House, but is largely screened from view by Northside and The Star Inn, as well as the downhill change in topography between Bridge House and the Site. The Former Flour Mill makes a limited contribution to the setting of Bridge House, albeit as a later remnant of local historic townscape due to the lack of visual relationship.

Northside

- 5.23 Slightly set back from the street, Northside was likely built in the seventeenth century, and refronted in the first half of the nineteenth. It was listed grade II on September 24, 1951.
- 5.24 Behind the refronted facade, the building has whitewashed brick walls and a hipped plaintile roof. Though Northside appears to be 3 storeys tall (plus basement) from the street, a view of the side elevation (figure 4.14) indicates that the rest of the building is two storeys tall, with an attic level. The principal elevation overlooks East Hill, and is faced in stucco.

- 5.25 Northside is of medium significance on account of its historic and architectural interest, and this is reflected statutorily in the building's listing at grade II.
- 5.26 It forms a grouping with Bridge House and the Star Inn which contribute to its setting.
- 5.27 The Former Flour Mill is visible in views of Northside from East Hill, however there are screening effects from the Star Inn. Thus, the Site makes a very limited contribution to setting, only by virtue of the Former Flour Mill being a later remnant of the local historic townscape..

The Star Inn

- 5.28 The Star Inn is a grade II listed pub at the bottom of East Hill. First designated on 24 September 1951, the list entry was amended on 4 June 1976. The historic core of the building likely dates from the seventeenth century, with a succession of later alterations, including the refronting of part of the principal facade in the nineteenth century.
- 5.29 The Star Inn is L-shaped, with its front elevation directly against the street and a long range to the rear, in what would have been the yard (now a car park). It was built in multiple phases and has been subject to many phases of alteration. The oldest portion of the building is two storeys tall (plus attic) and roughly rectangular in shape, with a gabled plaintile roof and dormer windows. To the rear of the building, there are various extensions, stepping down in height. Along East Hill, a blockish single-storey extension was added in the twentieth century.
- 5.30 The Star Inn is of medium significance due to its historic and architectural interest. In addition, as one of Ashford's historic pubs, the Star Inn has considerable communal significance (Ashford Heritage Strategy, para 9.1.13, p. 102).
- 5.31 It forms a grouping with Bridge House and Northside which contribute to its setting.
- 5.32 The Site is directly adjacent to the Star Inn, and, as much of the southern portion is taken up by a car park, contributes little to the Star Inn's setting with the exception of the Former Flour Mill being a later remnant of a local historic townscape.



Figure 4.14 Bridge House



Figure 4.15 Looking down East Hill towards Northside and the Star Inn



Figure 4.16 Northside



Figure 4.17 Looking southwest towards the Star Inn

Section 6

Assessment of Impact.

6 | Assessment of Impact

Summary of Proposals

- 6.1 The proposals are for the redevelopment of the Site through:
- The conversion of the former Flour Mill;
 - Demolition of some of the other existing structures; and
 - The erection of four ancillary blocks south of the former Flour Mill.
- 6.2 This redevelopment will provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'superlounge'), and 1 x office (Use Class E(g)(i)). Access from East Hill is to be retained, parking provided (including at ground floor level below the southernmost two blocks), and landscaping works undertaken, including on the island, which is to become public open space.
- 6.3 The proposed development would have similar effects on the Conservation Area and the settings of the surrounding three heritage assets due to their strong association and as such, the impact is assessed holistically.

Heritage and Townscape Impact

- 6.4 Most of the demolition will be focussed on post-1974 additions to the Site, which have no heritage value and - particularly in the case of the 4 storey extension - detract from the significance of the non-designated former Flour Mill, as well its townscape contribution to the Conservation Area. Much of the c.1901 former warehouse, apart from its east and west walls, will also be demolished. However, most of the warehouse's historic fabric, including its roof, was destroyed during the 1974 fire. The warehouse's most significant feature, namely its east and west walls, will be retained and incorporated into the design of one of the four blocks.
- 6.5 The former Flour Mill will be converted into the office of Oliver Davis Homes, with apartments above. As part of the conversion, a first floor extension will added to the north, over the building's existing ground floor footprint. The proposals will therefore enable the long-term conservation of the entire mill building, the upper floors of which were mostly standing empty when the it was in use as a nightclub. Given the fact

that much of the historic massing on the Site was destroyed during the 1974 fire, there is a precedent for greater density across the Site and a stronger frontage to East Hill.

- 6.6 Furthermore, the designs include three raised walkways on the second, third, and fourth floors, linking the former flour mill with the proposed block immediately to the south (above the former warehouse). This design feature therefore makes reference to the former links between the flour mill and Provender mill, a nod to the Site's history. By providing a degree of separation between the former flour mill and new building, the links will also ensure that adequate spacing is maintained between the two, ensuring that the former flour mill remains the most dominant building of the development.
- 6.7 The proposed designs have been developed with close consideration of the surrounding heritage assets. The four new blocks are to be between four and five storeys in height, and will therefore not block locally significant views of the former Flour Mill's tower from the top of East Hill, or from North Park (south of the tower). Furthermore, features of heritage interest identified in the Ashford Town Centre Conservation Area Appraisal, namely the sluice gates, which shed light on the history of the Site, will be retained.
- 6.8 The proposed new buildings are also in keeping with the conservation area's character, as there is a historic precedent both for greater massing on the Site and in its immediate surroundings. Prior to the 1974 fire and the building of the bypass north of the Site in the 1960s and 70s, the mill was part of a cluster of mostly C19 terraced buildings marking the eastern edge of Ashford. These included a group of buildings on the western side of East Hill, opposite the Site, and a row of terraced housing on the island east of the mill. The 1974 fire and demolition of buildings east and west of the mill, necessitated by the building of the bypass, had the effect of isolating the surviving mill buildings. The proposed development would therefore reintroduce some of the historic urban grain by strengthening the frontage to East Hill and introducing subservient development across the Site, albeit in a different location, which is a contemporary interpretation of its historic character and that of the immediate surroundings.

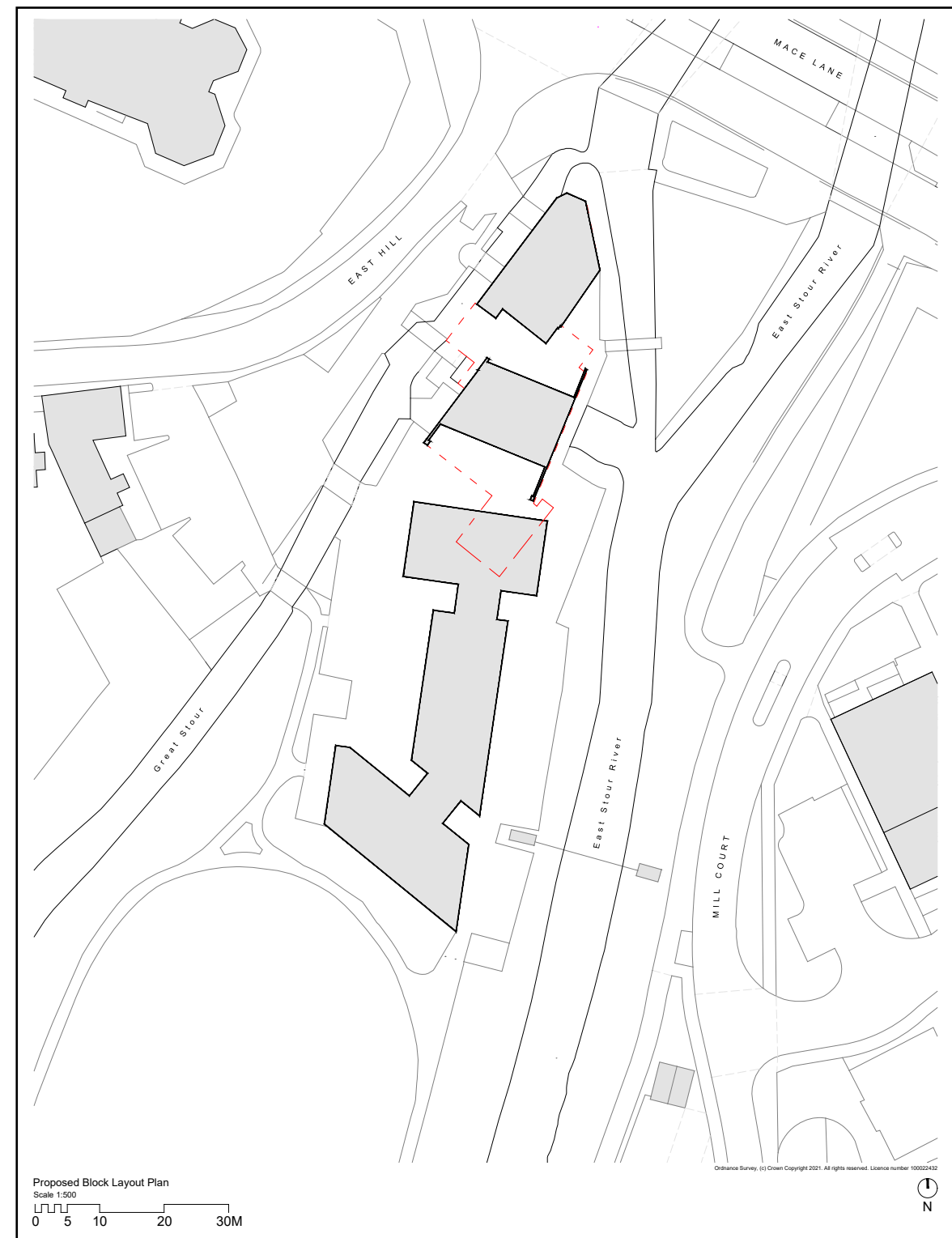
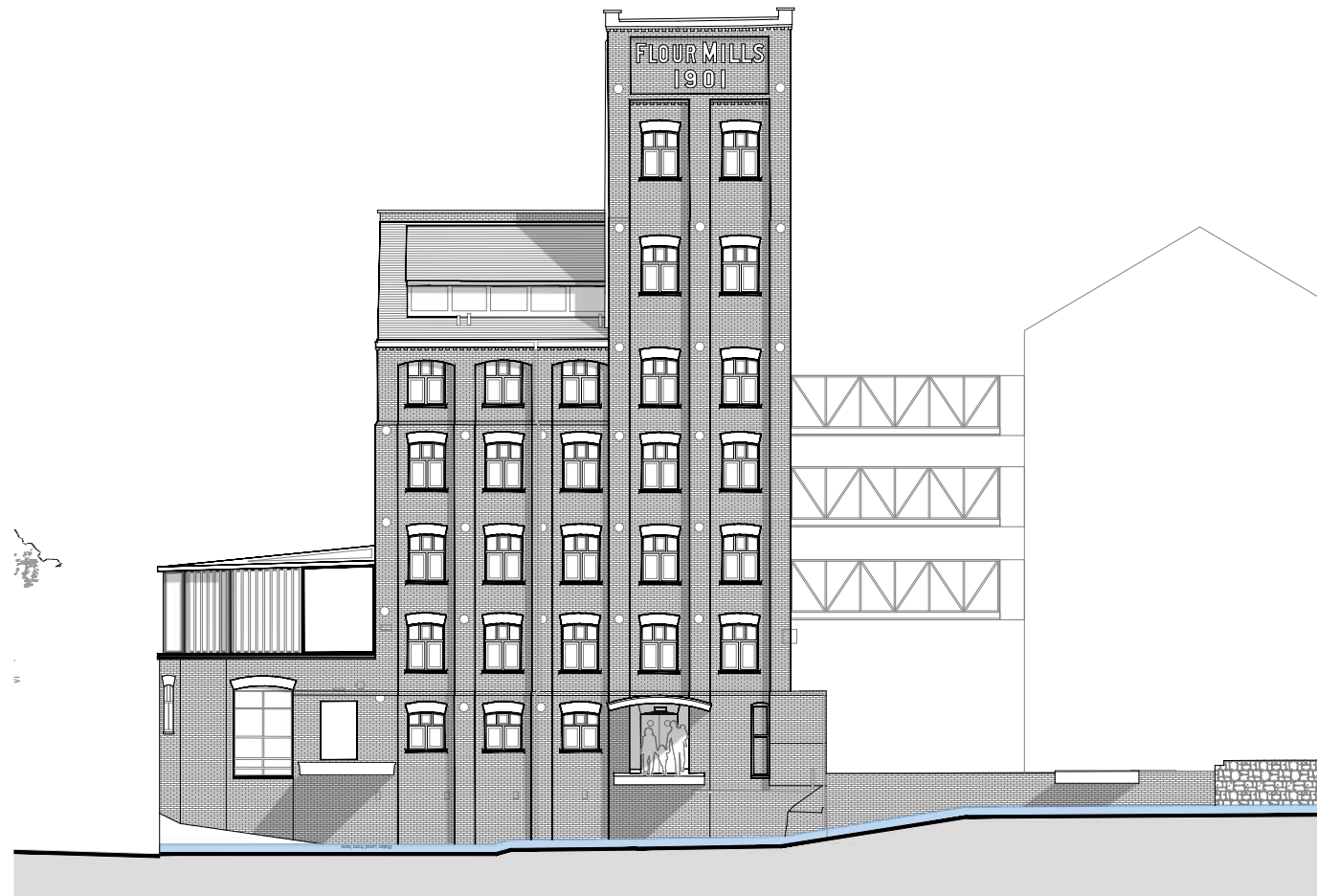


Figure 6.1 Proposed block plan of the Site. Outlines of demolished buildings indicated by dashed red lines
Source: Hollaway Architects



Proposed Elevation C-C
Scale 1:100

Figure 6.2 Proposed east elevation of the former Flour Mill
Source: Hollaway Architects



Proposed Elevation B-B
Scale 1:100

Figure 6.3 Proposed south elevation of the former Flour Mill
Source: Hollaway Architects

6 | Assessment of Impact

- 6.9 The new additions are of a high-quality design, reflecting the 'industrial' character of the area, for example through the use of louvres. However, whilst drawing on the language of the former industrial buildings on the Site, the new additions aim to be contemporary interpretations, avoiding pastiche. For example, the building directly adjacent to the former Flour Mill, which is being constructed above the retained walls of the warehouse, will be clad in metal, giving it an industrial feel, whilst also providing a contemporary contrast to - and maintaining the prominence of - the historic fabric below.
- 6.10 By maintaining the tower, its signage bearing its historic function/Pledge's name and drawing the design language from the historic character of the Site, the proposed development both maintains and celebrates the townscape contribution of the tower and the historic association of the Site with historic milling in the area.
- 6.11 Therefore, the new buildings will be positive additions, which enhance the character and appearance of Ashford Town Centre Conservation Area, as well as the settings of nearby designated heritage assets by removing detracting features and strengthening the East Hil frontage.
- 6.12 Finally, there are various public benefits associated with the proposed development such as the proposals for the island which is to become public open space and the environmental benefits of retention and refurbishment of the former Flour Mill and warehouse.



Figure 6.4 1929 Aerial view of the Site and its surroundings from the NW, giving an indication of the lost massing both on and around the Site
Source: Britain from Above



Figure 6.6 Proposed view of the Site from East Hill, looking east
Source: Hollaway Architects



Figure 6.5 Proposed view of the Site from Mace Lane (A292), looking south
Source: Hollaway Architects



Figure 6.7 Proposed view of the Site from East Hill, looking northeast
Source: Hollaway Architects

Section 7

Conclusion.

7 | Conclusion

- 7.1 The Site is a sensitive one, given its central location in Ashford, and long history of milling that likely stretches back to the eleventh century. However, much of the Site's historic character, including its contribution to the urban grain of East Hill, was destroyed during a catastrophic fire in 1974. As a result, the surviving, non-designated heritage assets on the Site appear somewhat isolated; unsympathetic extensions from the early 1980s, when the buildings were converted into a nightclub, detract from both the significance of the non-designated heritage assets and Ashford Town Centre Conservation Area. As such, there is an opportunity to reinstate the historic fabric of the Site and historic urban grain its surroundings through high-quality new development.
- 7.2 As noted in the previous section, the proposals bring a contemporary architectural approach to the Site, and derive their character from the Site's history and mill buildings. Overall, therefore, it is our conclusion that the proposals are a highly thoughtful response to the Site, and will enhance the Site's significance, the character and appearance of Ashford Town Centre Conservation Area, and the settings of the designated heritage assets near the Site, and enable the long-term conservation of the former mill. Furthermore, the creation of a new public open space on the island east of the former flour mill will allow for the appreciation of the Site by the public.
- 7.3 As such, the proposals are in full compliance with Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas Act) 1990, which pertain to the settings of listed buildings and Conservation Areas. The proposals' positive engagement with both the non-designated heritage assets on the Site, as well as the Conservation Area, is also considered to be wholly in line with guidance set out in the NPPF, specifically paragraph 206, which encourages new, sympathetic development within conservation areas.
- 7.4 Finally, by bringing redundant buildings and areas into appropriate use, consistent with their conservation, and ensuring that important views of the flour mill's tower are not impacted, the proposals also comply fully with Ashford Local Plan policies pertaining to heritage assets (Policy ENV13) and conservation areas (ENV14).

Appendix 1

References.

Appendix 1 | References

FORMER PLEDGE'S FLOUR MILL | (ASHFORD)

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Appendix 2

Statutory List Entries.

Bridge House

Overview

Heritage Category: Listed Building

Grade: II*

List Entry Number: 1071079

Date first listed: 24-Sep-1951

Statutory Address: BRIDGE HOUSE, 22, EAST HILL

Location

Statutory Address:

BRIDGE HOUSE, 22, EAST HILL

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Non Civil Parish

National Grid Reference: TR 01440 42774

Details

1. 5344 EAST HILL (South Side) No 22 (Bridge House) TR 0142 NW 1/57 24.9.51. II* GV 2. C18. 3 storeys red brick on a stone base with galleting. Hipped tiled roof and moulded wooden eaves cornice. 5 sashes with glazing bars intact, the centre window bay projecting slightly. Doorcase up 5 steps with handrail, the doorcase having pilasters, pediment, panelled reveals and door of 5 fielded panels.

No 22, garden wall to west of 22 and 24 to 30 (even) form a group.

Listing NGR: TR0137742776

Northside

Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1362865

Date first listed: 24-Sep-1951

Location

Statutory Address: NORTHSIDE, 24, EAST HILL

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Non Civil Parish

National Grid Reference: TR 01458 42779

Details

1. 5344 EAST HILL (South Side) No 24 (Northside) TR 0142 NW 1/58 24.9.51. II GV 2. Early C19 facade to probable C18 house. 3 storeys and basement stuccoed, the ground floor rusticated. Parapet with stone coping. String course above ground floor. 4 sashes with glazing bars intact. Round-headed doorcase with semi-circular fanlight and door of 6 fielded panels. 4 steps to street.

No 22, garden wall to west of 22 and 24 to 30 (even) form a group.

Listing NGR: TR0137742776

The Star Inn

Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1071081

Date first listed: 24-Sep-1951

Date of most recent amendment: 04-Jun-1976

Location

Statutory Address: 28, EAST HILL

Statutory Address: THE STAR INN, 26, EAST HILL

The building or site itself may lie within the boundary of more than one authority.

County: Kent

District: Ashford (District Authority)

Parish: Non Civil Parish

National Grid Reference: TR 01472 42770

Details

1. 5344 EAST HILL (South Side) 24.9.51. No 26 (The Star Inn) No 28 TR 0142 NW 1/59 II GV 2. The front dates from 1830-1840. 2 storeys stuccoed. Stepped parapet. String course. 2 sashes with glazing bars intact in moulded architrave surrounds. The ground floor window is a single large 3-light window with architrave over. On each side of it is a round-headed doorway with pilasters and semi-circular fanlight. Projecting iron bracket with gilded star suspended from it. To the rear is an C18 house with old tiled roof and 2 hipped dormers.

No 22, garden wall to west of 22 and 24 to 30 (even) form a group.

Listing NGR: TR0147242770



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