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STATEMENT OF SIGNIFICANCE & HERITAGE IMPACT ASSESSMENT

In respect of

**Proposed Residential Development at Eyhorne Street,
Hollingbourne, Kent**

On behalf of

Cantium Land and Development Ltd.

AHC REF: ND/10373

October 2025

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1.0 INTRODUCTION AND SCOPE OF REPORT

- 1.1 The purpose of this report, which has been prepared and written by Dr. Nicholas Doggett, FSA, MICfA, IHBC, Managing Director of Asset Heritage Consulting Ltd., and which should be read alongside the Design & Access Statement prepared by gdm Architects, on behalf of Cantium Land and Development Ltd., is two-fold.
- 1.2 The first is to provide an assessment of the contribution the application site makes to the overall heritage significance of nearby Godfrey House, a Grade II* listed building, while the second is to provide the proposed residential development scheme on the site with a cogent and sustainable justification in heritage terms.
- 1.3 The value of this two-stage approach (of assessing significance first and allowing this to inform an applicant's proposals) is that it complies with the requirements of paragraph 207 of the National Planning Policy Framework (NPPF).
- 1.4 This rightly places the onus on those planning changes to historic assets to begin this process with a clear description of the significance of the assets affected, albeit that the requirement in the NPPF is only such that *'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'*.
- 1.5 Indeed, the need to understand and evaluate 'significance' before moving on to assess the impact of potential change on that 'significance' has for some time been regarded as good conservation practice in the design and application process (see, for instance, English Heritage's 'Conservation Principles', 2008) and, following the introduction of the short-lived PPS5 in 2010 and then the first version of the NPPF in 2012, is now effectively a standard requirement for most applications affecting designated heritage assets.
- 1.6 Importantly, this approach also demonstrates to the Council (or to any other decision maker), that the heritage significance of the site as it currently exists has been fully analysed and understood as part of the formulation of the application proposals.

- 1.7 For all the reasons set out in this report, I can see no material reason in heritage terms why planning permission should not be granted for the application scheme.

2.0 HISTORICAL BACKGROUND, DESCRIPTION & ASSESSMENT OF SIGNIFICANCE

- 2.1 The application site, which is situated on Eyhorne Street, Hollingbourne close to a railway bridge which carries the London Victoria railway line over the road, is currently a roughly rectangular-shaped arable agricultural field directly adjoining the railway (**plates 1-4** and see the aerial photograph on p.9 of gdm Architects' Design & Access Statement). A lane opposite the site runs north-westwards to Hollingbourne Railway Station (**plates 5-6**).
- 2.2 The site is situated outside the Eyhorne Street Conservation Area, which lies well to the south-west, but is adjoined by the Grade II* listed Godfrey House, first listed in October 1952, immediately to the south-west (**plates 7-10** and **Appendix 1**).
- 2.3 As referred to in the Historic England list entry and in the date inscription over the entrance doorway on the front (roadside) elevation, this building was first constructed in 1567 and restored in 1859. 'Restoration' did not though stop in 1859 with further extensive repairs clearly having been carried out to its timber frame during the course of the 20th century.
- 2.4 If there have been significant changes to the physical fabric of Godfrey House, these are nothing compared to the far-reaching changes to its former rural setting. As demonstrated by the maps and the modern aerial photograph on p.9 of gdm Architects' Design & Access Statement, other than for the construction of the railway, this original rural setting survived intact at the time of the 1900 OS map and still remained instantly recognizable as late as 1960.
- 2.5 This is not however the case today. In recent years the Godfrey Meadow development, which extends along the roadside as far as the modern Hill Coutts House and then the row of post-War semi-detached cottages seen on the 1960 map, has been laid out on the other side of the road directly opposite Godfrey House (**plates 11-17**), while on the same side of the road as Godfrey House beyond its entrance driveway, next to which a modern garage building is set back from the road, Brickfields Close now also forms part of the listed building's immediate setting with the further cul-de-sac Claygate development beyond (**plates 18-23**).

- 2.6 Returning to Godfrey House, it sits in its own substantial grounds, which extend both to the front and rear of the listed building. Apart from the short section of boundary directly onto Eyhorne Street where the front elevation of the house can be clearly seen above the roadside hedge (**plates 6-7**), the boundaries of the property are well screened on all sides, including to the road beyond the house and to the application site where trees (including tall conifers) and other vegetation effectively screens the house from view even when the deciduous trees and plants among them are not fully in leaf (**plates 24-28**).
- 2.7 Finally, it should be noted here that the railway bridge and embankment on the north-east side of the application site effectively divorces it from the 20th-century development on the other side of the bridge, including the converted Snagbrook Oast (**plates 2 & 29-30**).

Assessment of Significance

- 2.8 As will be clear from the above, although the setting of Godfrey House has been significantly changed through the extensive modern development that has occurred around it, the building still warrants its Grade II* listing primarily because of its early date and the large amount of physical fabric (notwithstanding major 19th- and 20th-century 'restoration'), while the house's own grounds provide it with an adequate buffer from surrounding development.
- 2.9 Owing to its large size and particularly the prominence of its impressive front elevation, Godfrey House also enjoys 'landmark' status in the street scene (**see plates 7-8**).
- 2.10 In the Council's pre-application comments, it seems to be suggested that more importance should be attached to the application site than it warrants in heritage and landscape terms simply because it currently remains undeveloped.
- 2.11 There is however nothing to substantiate or justify this view, while it should also be clear from what is set out above that the application site does not in fact form part of the significance of the setting of Godfrey House, nor does it make any meaningful contribution to it.

2.12 Nevertheless, great care will still need to be taken in formulating the development scheme for the site to ensure that no harm is caused to the setting of the listed building, the ways in which the application proposals meet this important objective being discussed in the next section of this report.

3.0 THE APPLICATION PROPOSALS AND THE HERITAGE ISSUES

- 3.1 As will be clear from the description in Section 2.0 above, the application site is of no intrinsic heritage value and makes no meaningful contribution to the significance of the setting of Godfrey House, including the way in which it is experienced from the public realm.
- 3.2 In addition, the setting of this listed building has already been significantly altered through the extensive residential development permitted on both sides of Eyhorne Street in recent years.
- 3.3 This in turn means there is ample scope for an appropriate scheme of residential development on the application site, provided of course that this is of a form, scale and density which will not harm the setting of the listed building.
- 3.4 Turning now to the proposals themselves, the design rationale behind them is carefully and comprehensively set out in gdm Architects' Design & Access Statement and therefore needs little reiteration from me other than to say I endorse the approach taken.
- 3.5 The proposals are for 17 detached dwellings, all with private gardens as referred to in the Design & Access Statement, set in an appropriately designed landscape setting (see drg. no.pr-1113.PP.005 Rev B prepared by Alastair Macquire CMLI) in which native species planting, including around an attenuation pond (SUDS) in the south-western part of the site help to form an ample green buffer to the grounds of Godfrey House.
- 3.6 The scale, size and massing of the proposed dwellings are, in my view, appropriate to their locality, as are the materials proposed which draw on the local vernacular palette (see p.31 of the Design & Access Statement), including red brick and clay tile or slate roofs, together with clay tile wall hanging and the white-painted timber windows which are typical of Hollingbourne, while their elevational treatment takes its inspiration from other buildings in the locality, both historic and as found on the nearby successful residential developments (p.32).

- 3.7 This deference to local palette and distinctiveness also helps to enable Godfrey House to retain its deserved status as the 'landmark' building in this part of the Eyhorne Street street scene.
- 3.8 In short, it seems to me that the application scheme is a commendable one that does nothing to damage the significance of the setting of Godfrey House as it currently exists.
- 3.9 For all the reasons set out above and in Section 2.0 of this report, I take the view that no harm is caused to heritage significance, a position which is, of course, consistent with the clear advice in the NPPG under the heading 'How can the possibility of harm to a heritage asset be assessed?' that '*Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset*' (paragraph: 017 Reference ID: 18a-017-20190723).
- 3.10 In NPPF terms there is thus no need for the application proposals to engage with paragraph 207 of the Framework as this deals only with 'substantial' harm.
- 3.11 If, however, the Council (or any other decision maker) should consider that a degree of heritage harm is caused by the development proposals and that paragraph 208 of the Framework is therefore relevant, such harm must still fall very much at the lower end of the scale of 'less than substantial harm' as that term is defined and used in the NPPF and NPPG.
- 3.12 In this connection it is important to note the views of the Inspector, endorsed by the Secretary of State, in the recent, called-in Edith Summerskill House appeal decision (ref. APP/H5390/V/21/3277137
- 3.13 In coming to that decision, the Inspector first considered closely the junction between less than substantial harm and substantial harm: '*Essentially, substantial harm is set at a high bar, such that a good deal (or all) of the significance of a designated heritage asset would have to be removed for it to be reached. That means that the range for a finding of less than substantial harm is very wide indeed, from a harmful impact that is hardly material, to something just below that high bar.*

In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, then it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance (my emphasis)'.

- 3.14 This decision is particularly relevant here given that '*All the significance embodied in the asset itself (i.e., Godfrey House) would remain intact*' and that only a small part of the setting of the listed building is affected by the development proposals.
- 3.15 In addition, the significant public benefits of the proposals, including the provision of 17 housing units in a District where these are sorely needed (see the Planning Statement prepared by DHA Planning) mean that this is a case where it would be appropriate for the Council (or any other decision maker) to offset these benefits against any perceived heritage harm in the planning balance in the manner advised in the NPPF.
- 3.16 As such, I can see no material reason in heritage terms why planning permission should not be granted for the application proposals.

4.0 CONCLUSION

- 4.1 For all the reasons set out in the body of this report, it is clear the application scheme does nothing to harm the significance of the setting of the nearby listed building, the Grade II* listed building, Godfrey House.
- 4.2 As such, the scheme complies with the relevant guidance contained in the NPPF, local planning policy and, most importantly of all, meets the statutory requirements set by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.3 I can therefore see no material reason in heritage terms why the application proposals should not be granted planning permission.



Plate 1. Looking towards the railway bridge from the south-west



Plate 2. Looking towards the railway bridge from the east



Plate 3. Access to the application site from Eyhorne Street



Plate 4. Looking above the gate to the application site from Eyhorne Street



Plate 5. Looking along the lane to the station from Eyhorne Street



Plate 6. Looking from the end of the lane to the station towards the application site



Plate 7. Godfrey House seen from the access to Godfrey Meadow



Plate 8. Godfrey House seen from Eyhorne Street



Plate 9. Date inscription above the entrance to Godfrey House



Plate 10. Looking towards Godfrey House from near the Eyhorne Street end of the lane to the station



Plate 11. Godfrey Meadow



Plate 12. Godfrey Meadow



Plate 13. Godfrey Meadow



Plate 14. Godfrey Meadow



Plate 15. Looking towards Hill Coutts House and other 20th-century houses on Eyhorne Street



Plate 16. Looking towards Hill Coutts House and other 20th-century houses on Eyhorne Street



Plate 17. Post-War semi-detached cottages on Eyhorne Street



Plate 18. Entrance driveway and modern garage building to Godfrey House seen from Eyhorne Street



Plate 19. Brickfields Close



Plate 20. Brickfields Close



Plate 21. Brickfields Close



Plate 22. Claygate



Plate 23. Claygate



Plate 24. Looking towards the railway bridge from near the access to Godfrey Meadow; the grounds of Godfrey House are behind the hedge to the right



Plate 25. Looking towards the railway bridge from near the access to the lane to the station; the grounds of Godfrey House are behind the conifers to the right; the application site lies beyond these



Plate 26. Looking towards the grounds of Godfrey House with the application site in the foreground from the junction of the lane to the station



Plate 27. Looking towards the grounds of Godfrey House with the application site in the foreground from near the junction of the lane to the station



Plate 28. The boundary between the application site and Godfrey House seen from within the former



Plate 29. Looking towards the entrance driveway to Snagbrook Oast; the railway bridge is just around the corner off the picture to the left



Plate 30. 20th-century housing on Eyhorne Street beyond the railway bridge