

Briefing note

Project:	Possingham Farmhouse	Date:	9 September 2024
Subject:	Heritage Impacts	Reference:	289901

1. Scope of this report

The submitted outline planning application to Ashford Borough Council [the LPA] (22/00571/AS) was refused on a number of grounds, including heritage matters, in December 2023.

The LPA's assessment of the impact of the proposals upon the Grade II listed Possingham Farmhouse (a designated heritage asset), provided in the Committee Report dated 13 December 2023, was there would be an impact on 'the lower spectrum of less than substantial harm' on the significance of the Farmhouse, through the impact to its setting.¹ This assessment broadly concurred with that made by the applicant in the Built Heritage Statement (RPS, May 2021), which concluded that the harm was 'at the lowest end of the spectrum of less than substantial harm'.²

In response to the LPA's refusal, an appeal was submitted to the Planning Inspectorate and is currently active (reference APP/E2205/W/24/3345454). However, the LPA's Statement of Case [SoC] (undated) records that, during the drafting of the Statement of case and the weighing the benefits of affordable housing, the LPA have withdrawn the heritage reason for refusal, concluding that the harm is outweighed by the benefits.³

tor&co has been engaged to review the application and available appeal documentation and consider whether the conclusion of an impact of 'less than substantial harm' is fair and valid, or whether it could be concluded that the proposed development in fact results in 'substantial harm' to the significance of the designated heritage asset.

To this end we have undertaken a comprehensive review of the Built Heritage Statement and the LPA's Planning Committee report, as well as a brief review of the historic development of the site and Possingham Farmhouse. A site visit was carried out on 19 August 2024. This review is undertaken in the context of understanding how significance, setting and harm are defined and interpreted in the context of the historic environment and planning policy.

2. Background and previous assessments

The outline planning application was for the development of up to 655 residential dwellings, by Hodson Development Ltd, on land to the east of the A28 Ashford

¹ Committee report (13 December 2023), para. 99

² Built Heritage Statement, pp. 18, 19

³ SoC, 10.6, p. 18

Road, and to the north of Possingham Farmhouse. Possingham Farmhouse is a Grade II listed building (NHLE ref: 1071503). A timber-framed house, it has been dated to the 16th century or earlier (NHLE listing description).

The Built Heritage Statement assessed the built heritage assets which were considered sensitive to the proposed development at the site, concluding that the significance of the Grade II listed Possingham Farmhouse would be impacted by the proposals, stating that it 'is considered to incur only a very low degree of harm, at the lowest end of the spectrum of less than substantial harm, to the significance of Possingham Farmhouse through the general erosion of its wider agricultural landscape setting.'⁴

The planning application was put before the LPA's Planning Committee in December 2023 (agenda Item 6b), with the accompanying Committee Report summarising the application, consultation responses, representations, planning policy, and assessment of the proposals.

It does not appear that the Built Heritage Statement was submitted alongside the wider outline planning application documents. However, the Committee Report noted the planning statement's conclusion that 'the proposed development is considered to incur only a very low degree of harm, at the lowest end of the spectrum of less than substantial harm, to the significance of Possingham Farmhouse through the general erosion of its wider agricultural landscape setting.'⁵

As stated above, the Committee Report went on to 'broadly concur with the applicant's assessment of the impacts of the proposed development on the heritage assets' and that therefore, in accordance with policy ENV13 of the Local Plan and the NPPF, the harm would need to be weighed against the public benefits of the development.⁶

The Report's final conclusions, amongst other assessments, was that the development would 'demonstrably harm the landscape and would result in less than substantial harm to the Grade II Listed Possingham Farmhouse.'⁷

3. Considering the significance of heritage assets

Significance (for heritage policy), as defined in the NPPF (Annex 2 Glossary) is used to describe the heritage interest of an asset to this and future generations. This interest may be archaeological, architectural, artistic or historic. Significance derives from not only a heritage asset's physical presence, but also from its setting.

The NPPF and PPG (paragraph: 006 Reference ID: 18a-006-20190723) sets out a definition of these interests as:

Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it

⁴ Built Heritage Statement, p. 18

⁵ Committee Report, para. 98

⁶ Committee Report, para. 99

⁷ Committee Report, para.132

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.

The NPPF (Annex 2 Glossary) defines Setting as:

The setting of a heritage asset is the surroundings in which a heritage asset is experienced, its extent if not fixed, can extend beyond the asset's curtilage 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.

4. Significance of Possingham Farmhouse and the contribution of its setting

The Built Heritage Statement sets out a brief historic development of the site and its vicinity. This report identified that the site formed part of the agricultural landscape characterised by scattered farmsteads and that, from at least the 1830s, the site had a historical/functional relationship with Possingham Farm. Despite alterations to the field pattern over the 19th and 20th centuries, the site remains characterised by agricultural fields.⁸

The early history of the farmhouse, which, though altered, likely dates to the late 15th or early 16th century, comprises a modestly sized yeoman's farm (usually in the range of 30 to 50 acres) existing in a comparable landscape of dispersed farmsteads (figure 1). The building has evidence of a lower end jetty (now underbuilt) which, when considering the visibility of this feature on the building, hints at the historical importance of the adjacent byway (PRoW AW245) as a routeway towards Singleton and Ashford.

⁸ Built Heritage Statement, p. 9



Figure 1. Possingham Farmhouse from drive (looking SE)

The undeveloped agricultural character of the landscape forms part of the wider narrative of the farmhouse at Possingham Farm, and the farmhouse evidently has a historical functional and ownership association with its surrounding land, which formed its former agricultural holdings (figures 2 and 3). As such, it can be determined that the wider agricultural landscape around Possingham Farmhouse forms part of its setting and enables the agrarian past of the Farmhouse and its association with the land since the late medieval period, to be understood and appreciated.



Figure 2. View from PRoW AW245 across application site towards Possingham Farmhouse (in trees, centre left)

The Built Heritage Statement identifies that the historic association between the site and the Farmhouse has altered over time. The Farmhouse today is set within an enclosed domestic garden and adjacent paddocks, with what are described as ‘densely planted field boundaries’.⁹ The report states that this immediate setting is

⁹ Built Heritage Statement, p. 11

where the architectural and historic interest of the Farmhouse is most experienced. Changes to the field boundaries, ownership and occupancy relationships are now best understood through documentary sources.¹⁰



Figure 3. View north from PRow AW237 towards Possingham Farmhouse (in trees, centre right)

Though it references it in the policy context, the Built Heritage Statement does not specifically include among the changes the site allocation for development at Chilmington Green. Though not fully built out, this consented allocation, located to the northeast of Possingham Farm on the opposite side of the byway, could legitimately be included in the baseline assessment as representing an erosion of the wider agricultural landscape around Possingham Farm. In that regard, cumulative effects arising from this development ought to be considered in the impact assessment, in line with Historic England's guidance.¹¹

Following our recent site visit to Possingham Farmhouse and the surrounding area, we believe that the degree to which its setting contributes to its significance is perhaps understated in the Built Heritage Statement. The age of the building and its almost entirely undeveloped immediate setting are highly illustrative of the original conditions in which the farmhouse was built and used, specifically the late medieval agricultural landscape of dispersed yeoman farms. The area's 'strong rural character' was noted in the Historic Landscape and Built Heritage Appraisal prepared for the Chilmington Green and Discovery Park AA, along with the fact that the area has had 'the least amount of change in then landscape during the 20th century' and is of 'moderate to high' sensitivity.¹²

Though the farmhouse itself is now mostly concealed from views outside the property by mature tree boundaries, there remains a strong visual connection with the countryside from the immediate grounds of the farmhouse, notably from the paddocks and drive (figures 4 and 5). The views towards the site from the wider vicinity enable this connection to be understood and appreciated, where both the front- and backdrop are undeveloped agricultural fields (figures 2 and 3). The

¹⁰ Built Heritage Statement, p. 13

¹¹ Historic England, *The Setting of Heritage Assets, Good Practice Advice 3*, 2nd edn (2017), p. 4

¹² Chilmington Green & Discovery Park Area Action Plan (Wessex Archaeology, 2011), 4.4.2, p. 21; 6.9.1-6.9.2, p. 42

character of the undeveloped agricultural land and the visual connection between the two strengthens the contribution of setting.



Figure 4. Panoramic view north from paddock adjoining application site – housing would be visible on left



Figure 5. Panoramic view north from the paddock north of Possingham Farmhouse – housing would be visible from left to centre right

5. Impacts on significance arising from the proposed development

When considering the impact of a proposed development upon any heritage asset, one must first understand the significance of the heritage asset, and as stated above, this significance may be contributed to by the setting in which the heritage asset is experienced.

Once set out, the impact of any proposed development can be assessed; proposals may result in harm to the significance of heritage assets, and equally, proposals may result in impacts which are beneficial, in enhancing the significance of heritage assets. Proposals may also be neutral in impact.

The NPPF requires 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)'. The PPG sets out that 'Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated'. (Paragraph: 018 Reference ID: 18a-018-20190723)

In *Bedford BC v SSCLG* [2013] EWHC 2847 (Admin), the High Court held that, in order for harm to designated assets to be considered substantial, 'the impact on significance was required to be serious such that very much, if not all, of the significance was drained away... One was looking for impact which would have

such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced' [24, 25].

In effect therefore, determining 'substantial' harm to the significance of a heritage asset is a very high test, where proposals would result in the almost total loss of significance.

The impact of the proposed development would result in the loss of all the undeveloped agricultural land to the immediate north of Possingham Farmhouse, which, considered with the consented allocation at Chilmington Green, will result in a highly significant erosion of this contributory agricultural setting. The visual experiences towards and from the farmstead across the application site, together with the proximity of built development to the boundaries of the farm, will result in a heightened perception of this change. The scale of the proposed development adjacent to the Possingham Farmhouse boundary, which is shown on the building heights parameter plan (Clague Architects drawing no. 29892A_51H) as from 2.5 to 3 storeys, will exacerbate this effect, especially given the diminutive scale (1.5-storey) of Possingham Farmhouse.

As stated above, the Built Heritage Statement and the Committee Report both conclude that this erosion of the wider agricultural setting of Possingham Farmhouse would result in a very low degree of harm, at the lower end of the spectrum of less than substantial harm.¹³ Whilst we would agree that the harm remains in then less than substantial harm category, and therefore not 'substantial', we would assess that this harm would more reasonably be assessed to be 'moderate' within that category.

6. Conclusion

In preparing this brief note, we reviewed the heritage-related documentation relating to the refused application on the land to the north of Possingham Farmhouse (ref: 22/00571/AS) and carried out a site visit. These steps were undertaken in order to make a comparative assessment of the harm arising from the development on the significance of Possingham Farmhouse.

The relationship between historic farmhouses and the undeveloped landscape around them is typically more important than for buildings which were not farmhouses. In this case, the agricultural landscape is highly illustrative of the late medieval setting in which the farmhouse was constructed, although acknowledging that field boundaries and tree cover will have changed in that time.

Our assessment has found that the scale, proximity and extent of the proposed development would result in the diminishment of a highly contributory element of the setting of the Grade II listed Possingham Farmhouse, specifically the character of the agricultural landscape and the visual connections between it and the asset. However, it is acknowledged that there has been some erosion of setting from later changes, such as the change in ownership and the loss of a direct visual connection between the house itself and the wider landscape, although this would be reinstated to some extent if trees around the house were ever felled.

¹³ Built Heritage Statement, p. 19; Committee Report; para 99

Our impact assessment concurs with the Built Heritage Statement insofar as the harm is considered to be within the less than substantial category, rather than substantial. However, we would consider that the nature and extent of that harm within that category is greater than is assessed in that report. Given the revised importance of the setting to the significance of Possingham Farmhouse and the nature of the impacts of the development, we would consider the harm to be 'moderate' level of less than substantial harm.

London
Birmingham
Bournemouth

0203 664 6755
enquiries@torandco.com
torandco.com

All rights reserved.

No part of this document may be reproduced
in any form or stored in a retrieval system
without the prior written consent of the
copyright holder.

©tor&co 2024

tor
&CO

