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EXECUTIVE SUMMARY

In respect of

PROPOSED RESIDENTIAL AND OTHER DEVELOPMENT ON THE NORTHERN & SOUTHERN SITES

**PINS REFS: APP/V2255/V/24/3355313/14 &
APP/V2255/V/24/3355313/13**

LPA REFS: 21/503902/EIOUT & 21/503914/EIOUT

On behalf of

Five Parishes Group & Teynham & Highsted Action Group

AHC REF: ND/10359

Date: February 2025

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- 1 Following an introduction in Section 1.0 to the scope of evidence covered in this proof, Section 2.0 assesses the heritage significance of the settings of the principal designated heritage assets affected by the called in proposals – namely, the Grade II* listed Frogmal Farmhouse, the Grade I listed Church of St Nicholas, Rodmersham and the Milstead, Rodmersham Church Street, Rodmersham Green, Tonge and Tunstall Conservation Areas and the numerous listed buildings (several of them listed at Grade I) and locally listed buildings they contain.
- 2 For the reasons explained in Section 2.0 and as acknowledged by the appellants, the Grade I listed Church of St Nicholas and the Grade II* listed Frogmal Farmhouse are obviously of the highest heritage significance and this is beyond dispute.
- 3 As the Council's recent and adopted Conservation Area Appraisals show, the conservation areas clearly warrant designation as such, and it is worth noting that the appellants' heritage advisers have not challenged the quality of the Appraisals or the reasons for designation. Historic England clearly support their conservation area status, extent and the value of their settings.
- 4 Section 3.0 of this proof begins with an examination of relevant planning policy relating to the Historic Environment at both local and national level, as well as considering Historic England's 'Settings' Guidance (**Core Document 19.4**)
- 5 As Dr. Miele acknowledges in the Heritage Statement of Common Ground agreed with the Council on 28 January 2025 (**Core Document 34.8**), there are several instances where the called in proposals would cause a 'medium level of less than substantial harm' to several of the designated heritage assets discussed in Section 2.0 of this proof.
- 6 This is important because, while I cannot help feeling that the inordinate length of Montagu Evans' documents, with their seemingly endless analysis and tables of designated and non-designated heritage assets where it is stated that there is 'No harm, significance preserved' or that a '(Very) low level of less than-substantial harm' is caused might be intended to deflect attention from where irrevocable and serious harm is undoubtedly caused, Dr. Miele does at least acknowledge that harm will occur from the proposals.
- 7 In my view, the heritage harm is at its most serious and irreversible to the two most important individually designated heritage assets affected by the called in proposals – the Grade I listed Church of St Nicholas, Rodmersham and the Grade II* listed Frogmal Farmhouse, but there is also significant harm to Rodmersham

Church Street and Rodmersham Green Conservation Areas, Tonge Conservation Area and Tunstall Conservation Area and the many listed buildings (several of them listed at Grade I) and locally listed buildings they contain.

- 8 As far as the Church of St Nicholas, Rodmersham and Frognal Farmhouse are concerned, I very much concur with the high level of harm Historic England have found the called in proposals would cause to the settings of these two important buildings and the consequent irrevocable damage the proposals would cause to their significance.
- 9 Much the same level of harm would, in my opinion, be caused to the significance of the settings of Rodmersham Church Street and Rodmersham Green Conservation Areas, Tonge Conservation Area and Tunstall Conservation Area by the called in proposals, while at paragraphs 3.45 and 3.46 I set out the reasons why I believe they would be harmful to the setting of Milstead Conservation Area and its significance, albeit I acknowledge that this harm would be at a lower level.
- 10 In short, it is clear to me (for all the reasons set out the body of this proof) that the combined proposals are damaging to the historic environment of the large area they cover to a degree which (at its highest level) constitutes harm falling within the medium to upper level of 'less than substantial harm' as that term is defined and used in the NPPF and PPG.
- 11 I therefore respectfully urge the Inspector to dismiss these called in applications.