

Heritage Statement Report

Property: 59-61 High Street,
Oxford, Sevenoaks TN14 5PL



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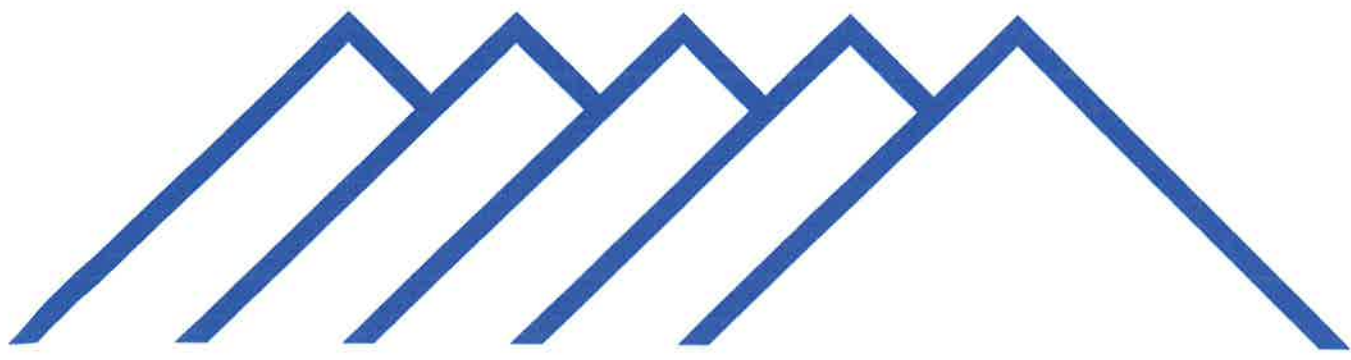
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Heritage Statement Report

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Executive Summary

JSM have been approached by the applicant and have asked us to create a Heritage Statement for a window renewal project at 59-61 High St, Otford, Sevenoaks TN14 5PL.

The plan is to remove and install new windows. We've undertaken research and a site visit to ascertain how the changes may impact the historic buildings and other important heritage assets locally.

The historic areas which could be impacted include:

- Locally listed buildings
- Listed buildings.
- Conservation area.

The applicant sites are protected with Grade II listed status. The listing includes both 59 and 61 Otford Road which are left and right semi-detached properties adjoined in the centre via a party wall.

The site resides within the Otford Conservation Area which also protects the local area from unsympathetic development. There are both protected and unprotected historic buildings locally, but it is our opinion that no buildings other than the affected sites will be affected by this development.

Conclusions

- The location of the applicant site is a recognised historic site, classified with, Grade II listed status.
- The two sites are part of the Otford Conservation Area
- The proposed changes won't harm or alter any protected sites in any way we perceive as unsympathetic or negative.
- There will be no impact or harm to any non-designated assets.
- The character and appearance of the Conservation Area will remain unharmed, unimpacted and instead will be preserved.
- We believe that the project won't affect how nearby sites are appreciated.
- Due to factors like urban structures, relative positions, lack of visibility between sites, and no direct connections, we think that other protected and unprotected sites won't be significantly affected.
- The project will improve the Conservation Area and maintain a beneficial use of the applicant site.
- The proposal fully aligns with laws, national and local heritage policies, and advice.

Recommendation

No further Built Heritage assessment is required, and the proposal is considered acceptable in terms of appropriateness of the development put forward to Sevenoaks District Council.

Surveyor's declaration

"I confirm that I have prepared this report."

Signature



Director: Joe Marshall BSc (Hons)
Date: Thursday 11th January 2024

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1 Introduction

1.1 Origin and scope of the report

Our clients the applicant and owners of the two sites of the proposed development have appointed JSM to create a Heritage Statement for a small project proposed at 59-61 High Street, Otford, Sevenoaks TN14 5PL.

The project involves replacement of several non original single-glazed windows on the front, back, and side elevations of the building. Currently the existing windows are not believed to be original to the buildings construction.

We've conducted a desk and site based study to evaluate how this proposal may affect the area's historical buildings. This is an early step in examining the proposed development site and may be needed for the planning process. Our report will help the local planning authority (LPA) decide how to respond based on the impact on any known or potential heritage assets. These are parts of the historical environment that are valued for their history, evidence, beauty, or community interest. The applicant must respect such environments.

We have undertaken this assessment following the rules of the National Planning Policy Framework (NPPF) (DCLG 2021). We've also used standards set by the Institute for Archaeologists (CIfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015), and the Institute of Historic Building Conservation (IHBC 2009).

Please note we've done our best to provide accurate information in this document, but there may be limitations due to the nature of historical materials and maps. To the best of the author's knowledge, the information is correct at the time of writing.

1.2 Designated Heritage Assets

The site is a designated heritage asset listed Grade II by Historic England. The listing located on Historic England's website is as follows:

The list description states: 59 and 61 High Street

Listed: Grade II

Details: Pair of cottages. C18 brick front with dentilled brick eaves cornice and hipped tiled roof. Each 2 storeys, 2 windows, irregular. Probably timber framed inside. at left projecting part under hipped gable. C19 and modern casements. Behind No 59 a C16 or earlier timber-framed wing. Filling partly of brick and partly rendered. High pitched tiled roof with old compound stack.

List Entry Number: 1259015

Date first listed: 16-Jan-1975

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1.3 Conservation Area

In addition to being listed the site is also within the Otford Conservation Area.

There is; however, no specific mention of the property within the conservation area guidance located at the following URL: <https://www.otford.info/vds/vds.pdf>. Our opinion notes that the property is of similar style to others within the conservation area.

It is noted that there are some 40 listed building within the conservation area the applicant property demonstrates additional architectural interest above that of the conservation area generally. This may potentially be due to significant age, construction and or appearance.

1.4 Nearby Designated Assets

There are a number of other listed buildings (primarily grade II listed) locally to the applicant site. Many of these properties face the High Street. Below is a summary of local Assets in order of proximity to the site.

It is noted that no sites are directly adjacent or neighbouring to the applicant site although some are in eyeshot along the high street. See Fig 5 for location of listed buildings:

1. THE HORNS PUBLIC HOUSE
 - a. Heritage Category: Listed Building
 - b. Grade: II
 - c. List Entry Number: 1259010
2. THE GRANGE
 - a. Heritage Category: Listed Building
 - b. Grade: II
 - c. List Entry Number: 1259017
3. PICKMOSS INCLUDING FORMER NO 67 (PICKMOSS COTTAGE)
 - a. Heritage Category: Listed Building
 - b. Grade: II*
 - c. List Entry Number: 1259016
4. FRONT GARDEN WALL OF THE GRANGE
 - a. Heritage Category: Listed Building
 - b. Grade: II
 - c. List Entry Number: 1259070
5. ORECOURT WALL TO BRIDGE COTTAGES
 - a. Heritage Category: Listed Building
 - b. Grade: II
 - c. List Entry Number: 1259011

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1.5 Non-designated assets (NDA)

The LPA maintains a separate list of NDAs or Locally listed buildings. Other assets have been scoped out of consideration; however, we were unable to locate properties directly adjacent or beside the applicant site.

1.6 Setting

In this scenario, the setting is directly connected with the Conservation area as a cottage type building facing the High Street. The listing includes the unique characteristics of the urban form with a tightness to the street scene that it encompasses.

The area has a distinct enclosed nature, which contributes to its overall charm and historical significance it also is backed on to larger areas of greenery also noted within the conservation area appraisal guide. This is worth conserving and would note that a side extension would be unsympathetic as a result.

There is no evidence to suggest that the proposed of near like for like window renewal would be harmful in anyway. This is particular if unsympathetic alternative proposals are sufficiently discharged. In fact, the principle of change, when executed thoughtfully and respectfully, can enhance rather than detract from the existing environment.

It's important to remember that while preserving specific areas, heritage developments are crucial. It doesn't necessarily mean freezing an area in time. Instead involves allowing for careful, considered development that respects and complements the existing historic fabric. This allows the owners of the sites to forfil their duty in protecting their heritage assets from deterioration and safeguarding for future generations.

1.7 Aims and objectives.

- Find out if there are any historic buildings that could be impacted by the proposed changes.
- Explain why these buildings are important, as required by national planning guidance.
- Evaluate how the proposed changes might affect the importance of these buildings.
- Suggest further studies if needed to understand how the historic buildings could be affected. Propose ways to lessen or completely avoid any negative effects on the historic buildings or their surroundings.

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Fig 1 Site Location Plans (Client 2023)

2 Site and Environs

2.1 Site

Situated on the south side of the High Street 59-61 are two semi-detached properties joined by a party wall. Whilst the two sites share listed status, they are infact 2nr dwellings with separated access and garden space. 59 is noted to be significantly larger than 61 with a rear side extension and front part forward of the main front elevation. The properties are both two storey with pitched clay roof. The main roof is shared between the properties; however, 59 benefits from a front facing and higher gable end which runs towards the rear addition forming and T shape. The property has primarily brick finish to the front although vertical hung tiles clad the first floor rear elevation, to the rear addition of 59 the first floor is rendered and in part clad with vertical shiplap cladding. Similarly in parts original timber framing of the construction are present. These elements are noted to form part of the buildings character and should be conserved and retained at all costs.



Fig 2 Rear and side elevations

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The Otford Conservation Area is known for its charming and historic architectural style within an “unspoilt rural countryside”. Many of the buildings are significantly old, some dating back to medieval periods. Many of the properties present were made with traditional materials and methods such as timber and brick with tile-hung facades. The roofs are often covered with tiles or thatch. This consistent yet different constructions give the area a classic English countryside and or Kentish Cottage aesthetic.

One of the standout features in Otford is the use of “half-timbering.” This is where a wooden frame of the building is exposed externally with spaces filled in by plaster or brick. It’s a style that really stands out and makes these buildings unique and distinctive.



Fig 3 Half brick and half Timbering

There are also some grander homes in the area which present a more formal style containing large windows and symmetrical designs. But even with these bigger places, there’s still a sense of history and connection to the past.

In the village centre, the buildings are closer together and tighter, creating cosy streets that curve and wind. This layout is typical of many old English villages, where the design grew naturally over time rather than being planned out all at once.

Overall, the Otford Conservation Area is a place where architecture tells the story of the past, with each building adding its own chapter to the tale.

The site and environs have been subject to change through time particularly over the course of the last 50 years where a drive for modern construction techniques have been imposed.



Fig 6 Street View of the Road (From site Survey)

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2.2 Designated Heritage Assets

The building in question is recognised as a heritage asset due to its historical significance.

Similarly, the Conservation Area has been officially designated as a heritage asset because of its unique cultural value.

Considering the urban and suburban structures that separate them, along with their relative positions, lack of visual connection, and absence of direct links, it's believed that other recognised and unrecognised heritage assets will remain largely unaffected by the proposed plan.

Therefore, no harm would be anticipated to historical or cultural importance as a result of like for like window renewal retaining timber framing but with double glazing. It has been noted that visually 20-24mm glazing thickness may create a bulky addition and may draw the eye appearing inconsistent and unsympathetic with the area. Therefore any glazing should be for reduced slimlite thickness and retain the existing material.

2.3 Conservation Area

The site is within the Otford CA. Fig 2 shows the site in relation to the Conservation Area boundary and Fig 3 shows the relative disposition of nearby LBs to the site.



Fig 4 Conservation Area (Sevenoaks 2024)

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Fig 5 Listed Nearby Assets (Historic England 2024)
Identified Blue Pins

The high street is noted to have buildings closely located to the road, with narrow pavements, but glimpses between them always provide a reminder of the open countryside beyond. The properties have private gardens of varying sizes, but it is the area of open space behind them that emphasises the intimate infrastructure of this part of the High Street.

The Conservation Area was designated in 1969, reviewed and extended in 1976 and 1990, and again reviewed in 2006.

The Conservation Area Appraisal has a summary of special interest (Page 11). The key purpose of this Conservation area is to abide to a plan which:

- Provide a basis for making sustainable community-based planning decisions about the future of the Conservation Area.
- Raise awareness of the importance and value of the local heritage;
- Record those principal elements that detract from the character or appearance of the Conservation Area;
- Identify distinctive built form and character within the Conservation Area;
- Identify opportunities for enhancement to be delivered through accompanying management plans or other initiatives;
- Inform key agencies, societies and residents whose activities impact on the Conservation Area and maximise the investment in the preservation and enhancement to the benefit of the social and economic quality of life;
- Provide guidance and set out objectives to preserve and enhance the buildings, structures and features;
- Identify distinctive public realm character within the Conservation Area, provide guidance, and establish key actions to preserve and enhance the public realm;
- Protect and maintain biodiversity;
- Outline the key statutory requirements in respect of development within the Conservation Area; provide guidance and set out actions to secure
- the proper and effective application of these requirements;
- Propose the implementation of management procedures to co-ordinate
- the delivery of new works and maintenance works within the public realm.
- A conservation area assessment was produced 2003 and updated in 2019.

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The Conservation Area covers 16 hectares, contains 40 listed buildings. The area is subdivided into four 'character zones' (Sevenoaks Road, Station Road, The Green and High Street; the site is within High Street.

There is no mention of the site specifically although one of the 40 listed buildings.

2.4 Non-designated assets

2.5 Setting

NDA's in the vicinity have been scoped out of consideration and there will be no potential impact on the setting of any other asset.

Setting is generally taken to mean the surround 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. (NPPF 2021 Glossary).

A setting is not an asset in its own right, nor does it have significance unless part of another heritage designation.

The contribution of setting is generally considered with reference to the Historic England document Good Practice Advice in Planning Note 3 The setting of heritage assets (3rd edition 2020) (GPA3).

In this case the setting is contiguous with the conservation area. As the proposal is minor works of replacement in a like manner it is suggested there will be no impact on either the setting or the character and appearance of the conservation area and it is therefore scoped out of consideration.

Wider views are precluded by the urban form; Proximate views within and the prospect from the asset and the Conservation Area will remain materially unaltered.

3 Significance

3.1 Planning History

A review of the LPA website reveals the following applications relate to the application in nature or location:

- 1 Castle Cottages The Green Otford Sevenoaks Kent TN14 5PD
- Ref. No: 23/01247/LBCALT Status: Granted
- 21/00919/LBCALT Replacement of 10 windows. Yew Tree Cottage 48 High Street Otford KENT TN14 5PQ Status Granted
- 18/00783/FUL Removal of existing windows. Replacement UPVC dark grain wood double glazed windows of similar design. Pond View House 6A And B High Street Otford KENT TN14 5PG Status Granted

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- 18/01019/LBCALT Replacement staircase, ground floor window and installation of first floor bathroom. Bubblestone Farm The Green Otford Sevenoaks KENT TN14 5PE Status Granted
- 17/02957/LDCPR Replacement of old windows with new white PVC windows on front and back of property. 55 High Street Otford KENT TN14 5PL Status Granted
- 17/01017/FUL Change of windows. 7 And 9 High Street Otford KENT TN14 5PG Status Granted
- 23/02943/LBCALT Replacement windows. Yew Cottage Station Road Eynsford Dartford Kent DA4 OER Status Granted
- 23/02665/LBCALT | Replace single glazed sashes with individual slimline double-glazed sashes including narrower glazing bars. Repairs to window frames. Replace plywood cover strips to dormer with timber. Replace timber soffits. Replace plastic rainwater goods with cast iron rainwater goods. The Coach House Ramhurst Manor Powder Mill Lane Leigh Kent TN11 9AS Status Granted
- 23/01557/LBCALT Front elevation window replacement. 3 Church Road Seal Sevenoaks Kent TN15 OAU Status Granted
- 23/01264/LBCALT Double glazed replacement windows and like for like door replacements. Wolfelands House High Street Westerham Kent TN16 1RQ Status Granted

When you look at the LPA's website, you can find a collection of requests for changes to windows in the immediate and wider Conservation Area generally. These requests ask to introduce new windows with thin double-glazing but match that of the existing style and thicknesses. Evidence has been collected supporting isolated instances of accepted modern upvc materials.

It is our view that these applications do not identify precedent due to the varied architectural nature of the area and changing nature of planning law; however, it is assumed that applicants who submit applications are treated with reasonably level of proactivity and fairness. If planning and conservation guidance has not changed then prior planning decisions may provide a firm basis for reasoning when deciding appropriate proposals. In the same way that the LPA can't say that one new building is going to be the example for all the others that come after. If the rules are followed the same way every time, then the outcomes should be the same.

With small changes happening across the conservation area, it appears that considered and appropriate applications are acceptable.

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3.2 Statement of significance

The determination of the significance of historic assets is based on statutory designation and/or professional judgement against 4 'values' (English Heritage/Historic England - 2008/2015) restated in the advice document GPA 2 - Managing Significance in Decisions

The 4 values are:

- Evidential value
- Aesthetic value
- Historical value
- Communal value

(This is refined by National Planning Policy Guidance (PPG), last updated in July 2021).

The site is a designated heritage asset.

The listed building of Grade II status and as such is of high significance, as a baseline. The building has evidential/historical value. The listing noted the 59 and 61 to be of a high aesthetic value and has been mostly well-maintained. The front windows, subject of this application is likely not original with potential replacement in the 20th century. The new units demonstrate little heritage value or significance worth conserving. As a result, communal value is not evident.

The Conservation Area is a designated asset and as such is of high significance, as a baseline. The area has been the subject of change over time. Its significance has remained unharmed. There is nothing to suggest that a watershed has been reached where the local character has been damaged since designation of the area in the 1970s.

The setting of an asset is not a heritage asset itself and hence is of no significance. It is contended that setting is contiguous with the conservation area and in itself.

Impact of Development

3.3 Site in general

The development is as described in the drawing pack submitted with the application.

The design of the replacement windows is appropriate noting deteriorated condition and need for renewal both regards to safety, thermal, acoustic and security performance being key drivers for renewal.

The development is in keeping with the Conservation Area in term of appearance, functionality and proportionality.

There will be no material change to the external appearance of the building.

Slim lite style glazing will limit negative proportions of the new units and change in glazing from single to double will only be visible upon particularly close inspection.

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3.4 Proposal

It is proposed to change the windows to the front, rear and side elevations.

The existing windows are considered to be 20th century replacements (i.e., not original fabric) of inferior quality and are in a poor state of repair. (See photos). The timber of which the window units were constructed of inferior quality; it has to be concluded that all in all the units are reaching the end of their useful, safe and servicable life. Repairs would be a temporary solution, as would secondary glazing which is often ugly in the internal view and is less successful improving environmental performance therefore amenity.

Not only are the units defunct but they are also not fit for purpose, and their environmental performances is poor. This is to the detriment of the sustainability of the listed asset and maintaining it in beneficial use in the medium to long-term is clearly to its benefit.

The proposed replacement windows must be constructed by an experienced and expert joinery company who specialise in work on sensitive heritage locations.

It is considered that the proposed development if utilising modern high quality timber (decorated to match in white) with replicated astragal bars through the glazing (not applied) and slimlite glazing will have no material impact on the significance of any part of the designated historic asset or local area.

3.5 Other designated assets

It is considered that the proposed development will have no material impact on the significance of any other designated historic asset. This includes local buildings but also the noted conservable assets to the listed building i.e. wall finishes and treatments.

Locally the presence of alternative materials such as upvc was noted to have been undertaken; however, noted to not be acceptable in the instance of a listed building.

3.6 Conservation Area

The site is within the Otford Conservation Area.

There will be no material impact on the appearance of the Conservation Area by improving environmental performance and sustaining the current use would represent an enhancement to the character of the Conservation Area.

3.7 Non-designated assets

Nearby NDAs/locally listed buildings are scoped out. There will be no harm to any other asset.

3.8 Setting

As discussed above, setting is not separate from the Conservation Area and currently makes no more contribution to the significance of assets and as such is neutral. The site is surrounded by buildings and forms of different dates. The scheme does not impact this at all.

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By virtue in the lack of intervisibility, relative disposition and intervening urban and suburban forms, the development has no material impact on the setting of the other listed buildings or NDAs in the vicinity and no harm will be caused.

3.9 Commentary

The development by virtue of sustaining a beneficial use is the optimum viable solution and therefore represents an enhancement.

There has been change over time in the area and site - clearly the significance of the asset remains unharmed. The development subject to this application does not take on-going change beyond the tipping point of acceptability.

Change is part of the character of most long-standing conservation areas as is the case here.

3.9.1 Harm

The NPPF, at paras 201 & 202, refers to harm to the significance of designated heritage assets. At para 203 it refers to NDAs.

In this case it is considered that the proposal will cause no harm to significance of any asset; there will be change, but overall that change will be positive and better reveal the significance of the assets and improve sustainability. As there is no harm there is no duty to prove public benefit, etc.

3.9.2 The Duty to Preserve or Enhance

The site is in a Conservation Area; development must seek to preserve or enhance the character and appearance of the CA. This is taken to be considered in the balance.

Clearly it is impossible to 'preserve' and change at the same time - it is commonly held that 'preserve' = no harm.

'Enhancement' does not only refer to the physical - social and economic well-being, but upkeep and utility can also contribute to the enhancement of a Conservation Area.

Similarly, 'Character' is not only visual - characteristics such as vitality, longevity, tranquillity, verdancy, etc. can also play a part - hence the duty maintaining character and appearance.

It is considered that the proposal overall will maintain the appearance and enhance the character of the Conservation Area - any impact will be in the positive.

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4 Photos

4.1 Photos

Following a site survey, we have provided the following photographs which illustrate the extent of the damage. The existing windows were noted to have decayed and demonstrate ongoing deterioration that warrants replacement.

61 High Street



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59 High Street



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5 Conclusions and Recommendations

5.1.1 Conclusions

The site (2nr joined semi detached property) is a designated heritage asset with Grade II listing.

The site is in the Otford Conservation Area.

The proposal will have no physical impact on the significance of any designated asset and cause no harm to the host structure or its appearance as part of its designation.

The proposal will have no harmful impact on the significance of any other NDA.

There will be no harm to the character and/or appearance of the Conservation Area - i.e., it will be preserved.

It is considered that the development will not impact on the contribution that the setting makes to the significance of nearby assets, there will be no harm.

By virtue of intervening urban and suburban forms, relative disposition, lack of inter-visibility and absence of causal links, it is considered that the setting of other designated and non-designated assets will be materially unaffected by the main scheme. There will be no harm to significance.

The development will have a positive impact on the significance of the Conservation Area and to an extent nearby assets, i.e., the significance will be better revealed, and a beneficial use sustained.

The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

5.1.2 Recommendation

No further Built Heritage assessment or reporting is required.

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6 Planning Framework

6.1 Statutory protection

Listed Buildings and Conservation Areas

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed, or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

6.2 National Planning Policy Framework

The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was updated in 2021.

One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be considered.

Section 16: Conserving and enhancing the historic environment, is key. The policies set out in this section relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making. (See also Planning Practice Guidance – Conserving and enhancing the historic environment section).

Paras 189 – 208 inclusive refer:

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. (Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases, they are inscribed for both their natural and cultural significance).

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

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c) the desirability of new development making a positive contribution to local character and distinctiveness; and
d) opportunities to draw on the contribution made by the historic environment to the character of a place.

191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets are considered under para 194 on:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:
a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) the desirability of new development making a positive contribution to local character and distinctiveness.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to

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the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Potential impacts are considered in para 199 on:

199. 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. 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.

Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional.
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁶⁸.

(Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.)

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence

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(and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. (Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository).

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

6.2.1 Local Policy

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise. Accordingly, the proposals are assessed against:

- The Core Strategy SP1 Design of New Development and Conservation.
- Allocations and Development Management Plan (ADMP) EN4 Heritage Assets; and
- The Sevenoaks Residential Extensions Supplementary Planning Document (SPD)

6.2.2 Determining significance

'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- **Evidential value:** the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- **Aesthetic value:** this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written.

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- Historical value: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative.
- Communal value: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.