

## **Proof of Evidence on Heritage – Appendices.**

### **Evidence of Gail Stoten BA (Hons) PG Cert Res MCI(A) FSA.**

Address Land at Moat Road, Headcorn

On behalf of The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge & Catesby Strategic Land Ltd

Date: 29th January 2025 | Pegasus Ref: P21-3568

LPA Ref: 23/504471/OUT

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# Appendix 1: Legislation and Planning Policy

## Legislation

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*,<sup>9</sup> which provides statutory protection for Listed Buildings and Conservation Areas.

**Section 66(1)** of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

***“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”***<sup>10</sup>

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

***“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”***<sup>11</sup>

A judgment in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 draft of the NPPF, the requirements of which are now given in paragraph 215 of the revised NPPF, see below), this is in keeping with the requirements of the 1990 Act.<sup>12</sup>

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<sup>9</sup> UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*

<sup>10</sup> *Planning (Listed Buildings and Conservation Areas) Act 1990*, Section 66(1)

<sup>11</sup> *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others* [2014] EWCA Civ 137. para. 24 CD 12.1

<sup>12</sup> *Jones v Mordue* [2015] EWCA Civ 1243 CD 12.2



## National Planning Policy Framework (December 2024)

National policy and guidance are set out in the Government's National Planning Policy Framework (NPPF) published in December 2024. This replaced and updated the previous NPPF (December 2023), with little change to policy relating to the historic environment. The NPPF needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The NPPF sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

Heritage Assets are defined in Annex 2 of the NPPF as:

***"A building, monument, site, place, area or landscape 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)."***<sup>13</sup>

As set out above, significance is also 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."***<sup>14</sup>

**Section 16** of the NPPF relates to 'Conserving and enhancing the historic environment'.

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<sup>13</sup> MHCLG, *NPPF*, p. 73

<sup>14</sup> MHCLG, *NPPF*, pp. 73.



**Paragraph 208** states that 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

**Paragraph 210** states that, in determining planning applications, local authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets by putting them to viable uses consistent with their conservation; and the desirability of new development making a positive contribution to local character and distinctiveness.

**Paragraph 212** states 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.

**Paragraph 215** states that 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.

**Paragraph 216** confirms that the effect of an application on the significance of a non-designated heritage asset should be taken into account, with a balanced judgement undertaken which has regard to the scale of harm or loss and the overall significance of the asset.

## National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.





The PPG has a discrete section on the subject of the Historic Environment,<sup>15</sup> which confirms that the consideration of ‘significance’ in decision taking is important and states:

***“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”<sup>16</sup>***

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

***“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. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***

***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”<sup>17</sup> (my emphasis)***

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<sup>15</sup> MHCLG, *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23<sup>rd</sup> July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>,

<sup>16</sup> MHCLG, *PPG*, paragraph 007, reference ID: 18a-007-20190723

<sup>17</sup> MHCLG *PPG*, paragraph 018, reference ID: 18a-018-20190723



## Appendix 2: Methodology

### Key Documents

The key documents that have been used in the preparation of this Heritage Proof of Evidence comprise:

- *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*<sup>18</sup> (henceforth referred to as 'GPA 2' CD 14.1);
- *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)*<sup>19</sup>, the key guidance of assessing setting (henceforth referred to as 'GPA 3', CD 14.2);
- *Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12*<sup>20</sup> (CD 14.3);
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*<sup>21</sup> (henceforth referred to as 'Conservation Principles' CD 14.4); and

### Assessment of Significance

In the NPPF, heritage significance is defined as:

***“The value of a heritage asset to this and future generations because of its heritage interest. That 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***

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<sup>18</sup> Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2<sup>nd</sup> edition, Swindon, July 2015) CD 14.1

<sup>19</sup> Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> edition, Swindon, December 2017) CD 14.2

<sup>20</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019) CD 14.3

<sup>21</sup> English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008) CD 14.4



***cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.*"<sup>22</sup>**

GPA 2 gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.

In order to do this, GPA 2 also advocates considering the four types of heritage value an asset may hold, as identified in *Conservation Principles*.<sup>23</sup> These essentially cover the heritage 'interests' given in the glossary of the NPPF<sup>24</sup> and the PPG which are ***archaeological, architectural and artistic*** and ***historic***.

The PPG provides further information on the interests it identifies:

- **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 skills, 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."<sup>25</sup>*

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<sup>22</sup> MHCLG, NPPF, p. 78.

<sup>23</sup> English Heritage, *Conservation Principles* – These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see *idem* pp. 28–32. CD 14.4

<sup>24</sup> MHCLG, NPPF, p. 78.

<sup>25</sup> MHCLG, PPG, paragraph 006, reference ID: 18a-006-20190723.



Significance results from a combination of any, some or all of the interests described above.

The most-recently issued guidance on assessing heritage significance, Historic England's *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12*,<sup>26</sup> advises using the terminology of the NPPF and PPG, and thus it is that terminology which is used in this Proof of Evidence.

## Setting and Significance

As defined in the NPPF:

***“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”<sup>27</sup>***

Setting 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.”<sup>28</sup>***

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

## Assessing Change Through Alteration to Setting

How setting might contribute to these values has been assessed within this Proof of Evidence with reference to GPA 3 particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.<sup>29</sup>

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<sup>26</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019) CD 14.3

<sup>27</sup> MHCLG, *NPPF*, p. 78.

<sup>28</sup> MHCLG, *NPPF*, p. 78.

<sup>29</sup> Historic England, *GPA 3* p. 8 CD 14.2



In GPA 3, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and also that factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement)<sup>30</sup>:

***Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.***

***Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from***

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<sup>30</sup> *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, para. 25 and 26 CD 12.3



*the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”*

## Levels of Significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the NPPF, comprising Grade I and II\* Listed Buildings, Grade I and II\* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 68 of the NPPF;
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the NPPF, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and
- **Non-designated heritage assets**. Non-designated heritage assets are defined within the PPG as “buildings, monuments, sites, places, areas or landscapes identified by plan-



*making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.*<sup>31</sup>

Additionally, it is of course possible that sites, buildings or areas have **no heritage significance**.

## Assessment of Harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In order to relate to key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”;<sup>32</sup> and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

*“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”*<sup>33</sup>

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle of the spectrum and upper end of the less than substantial harm scale.

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<sup>31</sup> MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

<sup>32</sup> EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council, para. 25 CD 12.4

<sup>33</sup> MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723



With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated. As such, harm to such assets is articulated as a level of harm to their overall significance, with levels such as negligible, minor, moderate and major harm identified.

It is also possible that development proposals will cause **no harm or preserve** the significance of heritage assets. A High Court Judgement of 2014 is relevant to this. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, 'preserving' means doing 'no harm'.<sup>34</sup>

Preservation does not mean no change; it specifically means no harm.

*GPA 2* which states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".<sup>35</sup> Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in *GPA 3*, described above. Again, fundamental to the methodology set out in this document is stating "*what matters and why*". Of particular relevance is the checklist given on page 13 of *GPA 3*.

It should be noted that this key document also states that:

***"Setting is not itself a heritage asset, nor a heritage designation..."***<sup>36</sup>

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage values that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA 3* states that:

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<sup>34</sup> *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin) CD 12.5

<sup>35</sup> Historic England, *GPA 2*, p. 9. CD 14.1

<sup>36</sup> Historic England, *GPA 3*, p. 4 CD 14.2





***“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.<sup>37</sup> (my emphasis)***

Additionally, it is also important to note that, as clarified in the Court of Appeal, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused.<sup>38</sup>

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<sup>37</sup> Historic England, *GPA 3*, p. 8 CD 14.2

<sup>38</sup> *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061 CD 12.6



## Appendix 3: The Moat Listing Entry

### Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1060848**

Date first listed: **26-Apr-1968**

Date of most recent amendment: **21-Oct-1986**

List Entry Name: **THE MOAT**

Statutory Address 1: **THE MOAT, MOAT ROAD**

### Location

Statutory Address: **THE MOAT, MOAT ROAD**

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

County: **Kent**

District: **Maidstone (District Authority)**

Parish: **Headcorn**

National Grid Reference: **TQ 83069 44367**

### Details

HEAD CORN MOAT ROAD TQ 8344 (North side)

10/85 The Moat (Formerly listed as float Farm House) 26.4.68 II



Farmhouse, now house. Early to mid C16, restored 1960's. Timber framed. Ground floor red brick in stretcher bond, first floor tile-hung. Plain tile roof. Lobby entry plan. Probably 4 timber-framed bays including smoke, now stack, bay. 2 storeys, formerly with continuous jetty, returned to left. Hipped roof, with gablet to right. Brick ridge stack off-centre to left and truncated projecting brick stack to right gable end. Irregular fenestration of three 3 light casements. Tripartite sashes to ground floor. Panelled door with 2 top lights up 3 steps beneath stack. Open gabled timber porch. C18 or early C19 rear wing to left, ground floor red brick, first floor weatherboarded. Interior: only partly inspected. Exposed framing. Moulded beams and joists. Said to have crown post roof. Formerly a moated site.

Listing NGR: TQ8298044404

### **Legacy**

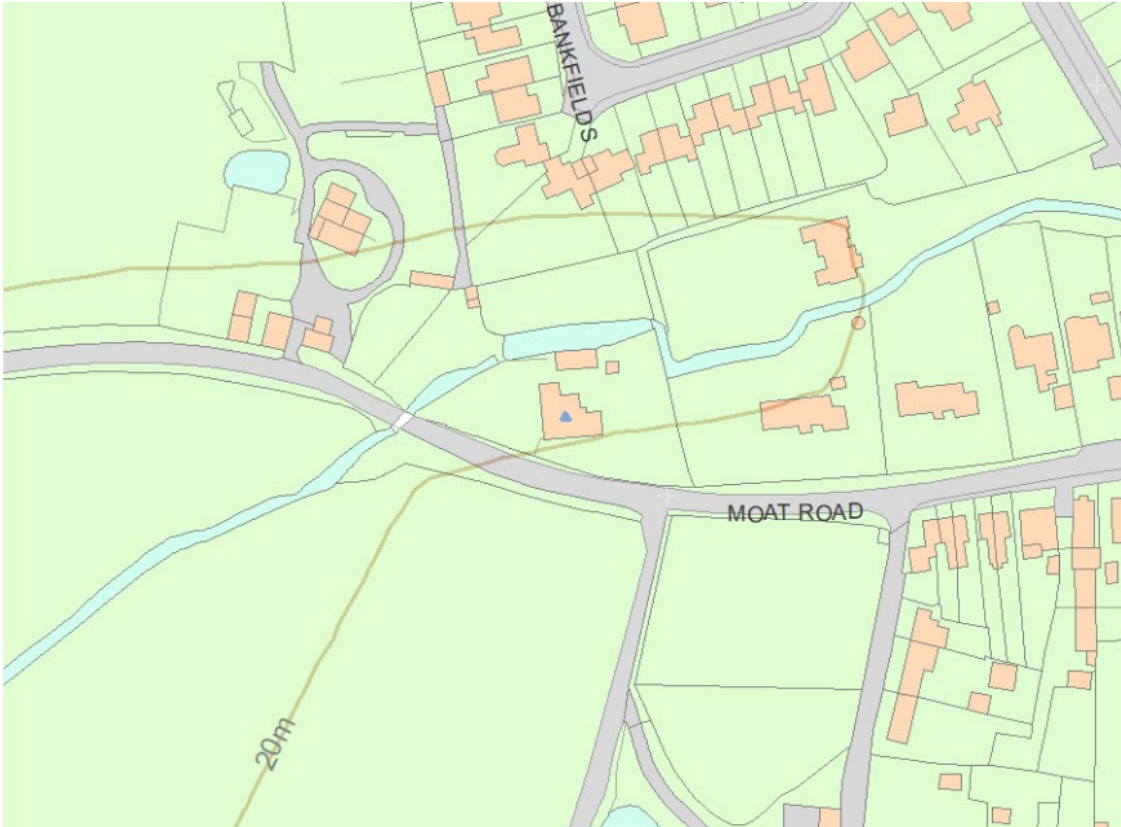
The contents of this record have been generated from a legacy data system.

Legacy System number: **174311**

Legacy System: **LBS**

### **Legal**

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



**End of official list entry**

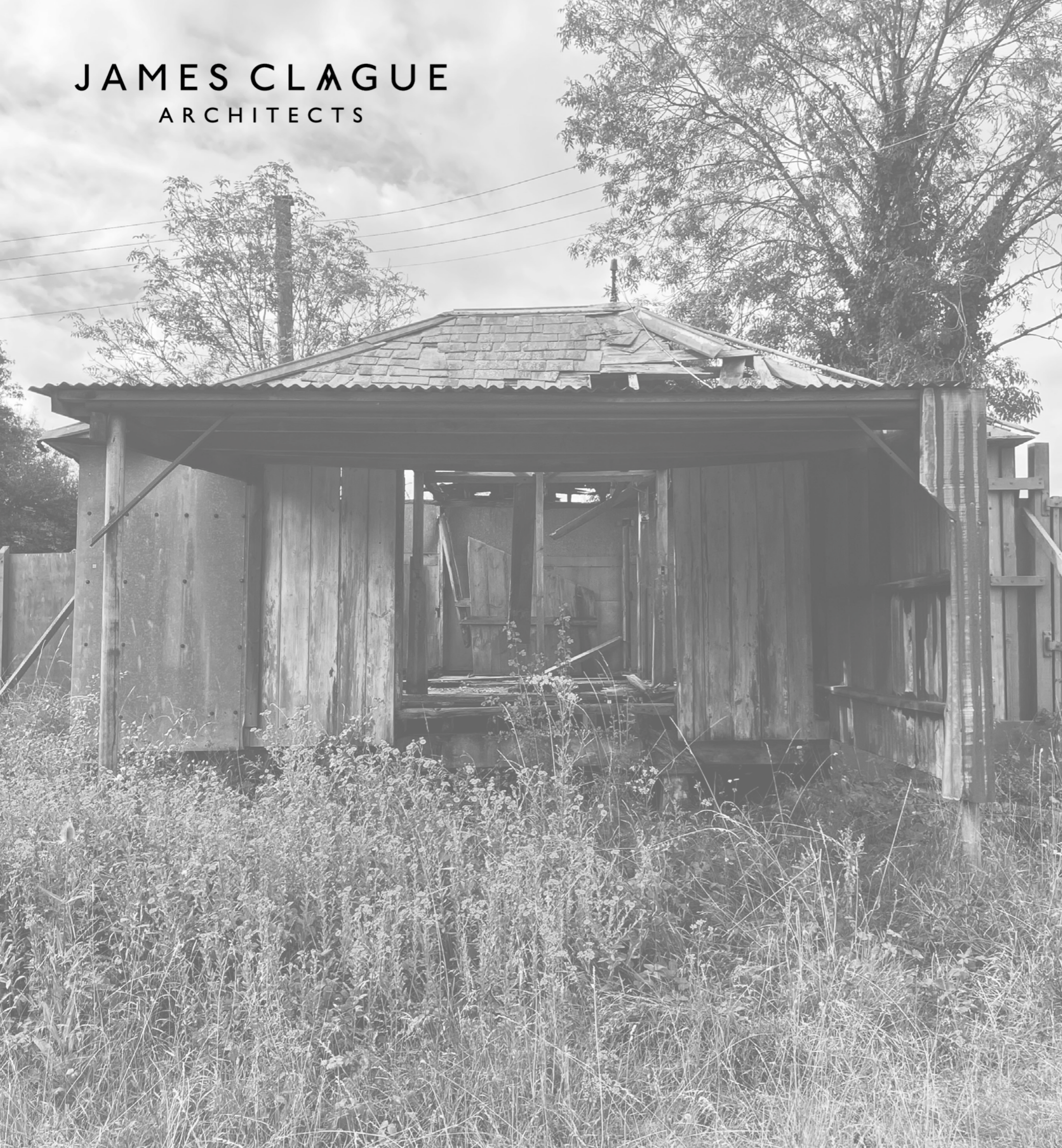


## **Appendix 4: Methodology for Repair and Reconstruction of the Granary**



JAMES CLAGUE  
ARCHITECTS

THE GRANARY  
MOAT FARM  
HEADCORN



METHODOLOGY  
FOR REPAIR AND  
RECONSTRUCTION

January 2025



## 1.0 SCOPE OF REPORT

This report supports the repair and reconstruction of the historic timber-framed former granary structure to Moat Farm, Headcorn, to restore it to a structurally sound and weathertight condition to allow for a future new use.

The report accompanies 1:50 measured and scaled survey and proposed drawings identifying all structural components, finishes and fittings which are to be retained, replaced, removed or repaired, including methods of repair where applicable.

The report and drawings are based on a point cloud laser survey, and hand measured survey at ground level carried out from the exterior only, as the structure is not fully accessible due to its structurally unsound condition. The survey was carried out mid November 2024 and the information is supplemented by photographs of the structure taken in the same period. The content is limited to identifying structural and construction defects which are apparent to the eye with some discussion of the likely causes based on an understanding of its historic form and method of construction, the effect of any alterations over its lifetime and other causes of potential failure or decay. Further investigation and assessment of the condition of the assembly of joints and high-level structural components will only be possible once works commence on site and the structure has been fully exposed, additional temporary supports installed and the frame cleaned and carefully defrassed as necessary.

Issue/ Revision	Date	Description
Planning Application	December 2024	Issued to Client
	January 2025	Issue 01 to client

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## 2.0 BACKGROUND

The granary structure is a circa 19th century free standing timber-framed structure fronting the north side of Moat Road in the former farmstead setting of Moat Farm in Headcorn, Kent.

The structure forms part of an assembly of structures but appears to be the only extant historic structure and is considered to be curtilage listed by association with the adjacent Grade II listed Moat Farmhouse. The Heritage Statement prepared by Pegasus Heritage Consultants provides more information on the significance of the structure and its setting.

The structure has been redundant for a considerable time and as a consequence has fallen into substantive disrepair including the partial collapse of the roof resulting in extensive decay of the timber frame and linings due to water penetration. The structure has also suffered some historic vandalism, however, the owners have secured the site with hoarding and protective sheeting to the walls.

The proposal seeks to repair and reconstruct the structure, reinstating missing components based on extant evidence, to provide a structurally sound, secure and weathertight structure suitable for a variety of new uses associated with the proposed development of new housing on the wider site.



north elevation



south elevation from road



west elevation



### 3.0 OVERVIEW OF EXISTING STRUCTURE

1. The structure comprises a single bay single storey structure of approximately 7.4 wide by x 5.5m deep orientated on north-northwest - south-southeast axis and raised on stone staddle stones supplemented in places by concrete or timber props. The single space was evidently subdivided with demountable half height partitions to form grain bins and accessed by a single pedestrian door to the east, presumably originally accessed via a short ladder, and ventilated by a high level hatch with shutters to the west. A new wide opening has been formed to the north with inserted wall posts to link to a rudimentary lean-to structure. This element is not original, and it is not proposed to replace it but to reinstate the original wall frame and cladding to the opening instead.
2. The walls have been lined externally and internally to the south side only with galvanised steel sheeting, presumably for protection, but a substantive quantity of the original timber boarded wall cladding appears extant. The floor and roof frame provide substantive evidence of the layout and construction of the original structure despite some evidence of alteration and substantive damage due to decay and subsequent structural failure and cosmetic damage arising primarily from prolonged water ingress due to the loss of the roof covering, and possible vandalism. The roof has suffered considerable loss but appears to have been historically substantially replaced above wall plate level.
3. The historic frame appears to be a variety of slow grown durable softwood, possibly *Pinus sylvestris* (Scots Pine) imported from the Baltic or *Pseudotsuga menziesii* (Douglas Fir) imported from North America. There is evidence of bandsawn conversion of the timber (characterised by a regular pattern of widely spaced sawmarks set at 90 degrees to the length of the timber), which dates from the latter part of the 19th century.
4. It is notable the roof timbers have decayed considerably compared to the wall and floor frame, possibly due to the use of less durable timber in its replacement.
5. The exposed timber frame comprises three substantive beams or girders with shaped ends each resting on three staddle stones or replacement props. The beams support floor joists set perpendicular and finished in thick tongue and groove floor boards nailed to the joists.
6. The wall frames comprise door and corner posts supported off a cill plate (to 2 sides only, otherwise off the joist parallel to the wall frame) supporting a wall plate and clad in vertical tongue and groove boards secured to the exterior with forged rosehead nails on rails morticed into the posts. The posts and beams appear to be traditionally pegged, morticed and tenoned. Chiselled carpenter marks using Roman numerals are evident.
7. The roof structure is shallow, and hipped with a short length of ridge and comprises 2 no. tie beams dove-tail half-lapped to the wall plate secured restrained with twisted forged iron straps (possibly added later) and each supported along their span by two posts to form a central passage. The 4 posts (one now laying on the ground) are pegged, morticed and tenoned into the tie beams. It is not evident how they are fixed to the floor structure.
8. The roof structure appears to have been extensively supplemented and replaced, and is now in a serious state of disrepair and decay with many components missing. The assembly appears to comprise paired common rafters birds-mouthed and skew nail fixed to the wallplate and skew nail fixed to a ridgeboard ( a feature and method of fixing common in the later 19th century). Alternative pairs of rafters are connected with collars supporting a trenched purlin with hip rafters and jack rafters to the hips. The collars appear to be morticed and pegged to the rafters rather than half lapped.
9. The roof is finished in softwood sheathing/sarking boards (possibly penny gap or tongue and grooved?) onto which Welsh slates are directly nailed. A timber mop stick batten to the ridge and hip secured with iron brackets (which appear to be spiked into the timbers) secure preformed galvanised iron or mild steel hip and ridge coverings. The rafter feet are splayed and enclosed with a solid timber soffit. There is no evidence of gutter brackets.
10. The central posts and corresponding wall posts are haunched and grooved to form slots to receive the grain bin 'holds'. These features appear to have been extended in height by the addition of nailed battens. The evidence suggests the subdividing partitions comprised 3 horizontal rails supporting vertical tongue and groove boards and were ramped in appearance (presumably to reflect the settlement of the piled grain) with the top rail pegged and morticed into the posts. The partitions to the central passage appear to have comprised a series of boards slotted into the grooves in the posts to allow for easy removal. Unfortunately these features have been almost extensively lost and it is not proposed to reinstate the partitions as this would be based on conjectural evidence.
11. The extant joinery comprises a single partial section of the aforementioned grain bin partition and ledge and boarded doors to the east and west ends hung off forged strap and pintol hinges. The locking mechanisms have been lost.
12. The central posts appear to have been altered by the addition of timber brackets nailed to the head of the posts to support a short length of plate which appears to in turn support an additional central post, possibly to reinforce the inserted partition although its exact purpose is unclear. It is not proposed to reinstate these components.
13. It is likely the steps to access the pedestrian door were demountable and there is no evidence of this feature.
14. An electricity mast has been installed in the ridge, which will be replaced with a new electricity connection to suit future use.

## 4.0 SUMMARY OF PROPOSED WORKS

The proposed works include the following:

1. Carefully stripping and setting aside securely for reuse the roof finish, sarking boards, wall cladding and floorboards and providing external weather protection for the duration of the works.
2. Inserting props to allow for safe access to enable recording and identifying structural components in-situ before dismantling as necessary for repair/reinstatement and removing redundant timbers as identified on the attached drawings.
3. Carrying out necessary conservation repairs to the structural frame and finishes to include reinstatement of missing or extensively decayed components to restore the structural assembly to a sound, load bearing condition before reinstating finishes, all to match the original detail.
4. Addition of external steps and ironmongery for secure access to be agreed and subject to condition.

## 5.0 GENERAL DEFECTS

Once the timbers are fully exposed and cleaned a full assessment of the extent of any defects can be made and is likely to comprise the following causes:

1. **Fungal and Beetle Infestation** - multiple timbers show evidence of surface timber decay or full sectional decay caused by fungal decay due to prolonged contact with penetrating moisture resulting primarily from the loss of the roof finish. The roof timbers appear to have been most susceptible suggestive of a less durable material than the earlier frame. There is also evidence of flight holes caused by wood boring insects which may be historic unless the timbers have been exposed to long term damp or fungal decay where beetle decay may be more extensive. Causes of penetrating damp will be remedied by removing the sources of water ingress through repairs to the roof finish and weatherings. Following the reinstatement of coverings all retained and reinstated timbers should be allowed to dry out with monitoring of beetle activity before consideration is given for timber treatment.
2. **Structural Failure of Timber Members and Joints** - this is likely to have occurred predominantly as a result of the above causes, however structural stresses caused by differential movement of other structural members, inadequate past repairs or replacement of material, overloading or eccentric loading of structure and lack of lateral restraint/bracing should be considered. The section sizes of structural members in historic buildings were often selected on the basis of availability and the experience of the carpenter and do not necessarily meet the structural requirements and calculations of modern engineering standards and codes of practice. A full survey of all components and joints is recommended to ensure their adequacy and effectiveness with joints repaired with new wedges and pegs as necessary and supplementary material e.g. paired timbers or straps should be considered where otherwise sound material can be retained.

## 6.0 OUTLINE SCHEDULE OF REPAIRS

Generally,

### 6.1 Initial and Enabling Works

- 6.1.1 Erect scaffold complete with weather protections to roof and sides for the duration of the works.
- 6.1.2 Insert temporary props and shoring as necessary to secure and arrest further collapse of frame prior to commencing work.
- 6.1.3 Strip off steel protective sheeting and carefully remove tongue and groove external cladding as required for reconstruction recording its location for future reinstatement and set aside securely in dry sheltered location for reuse fully exposing timber frame.
- 6.1.4 Strip off all existing roofing including carefully removing sarking boards and set aside securely for reuse in dry sheltered location fully exposing timber frame.
- 6.1.5 Carefully remove existing floor boards and set aside securely for reuse in dry sheltered location fully exposing timber frame.

### 6.2 Repair and Replacement Work to Existing Timber Frame

- 6.2.1 Carefully brush down all timber frame members with a stiff brush to remove surface debris and friable material and assess condition of members and joints. No wire brushing, sand blasting or chemical or mechanical means of cleaning to be used without prior consent of supervising Architect/ Surveyor or Conservation Officer.
- 6.2.2 Carry out specified repairs in accordance with drawings and remove all superfluous material, props, etc. as identified.
- 6.2.3 Wherever possible, repairs are to be carried out in-situ, however, it is recognised that a considerable degree of disassembly and reconstruction will be required and repairs may be carried out on the workbench but consideration should be given for the use of slip tenons and other means of practical reassembly. Where components are to be dismantled as part of the repair process, always mark and record the constituent parts, including location of fixings, before dismantling.
- 6.2.4 The alignment of the original frame should be established based on analysis of the existing assembly when corrected. Allowance should be made for re-bedding the staddle stones to ensure a sound level base.
- 6.2.5 Generally replacement of full members is only recommended as a last resort, however as the loss is extensive and there is sufficient evidence to inform the replacement, new components will be acceptable where Irrecoverable loss has occurred.
- 6.2.6 Replacement timber to the existing frame to be housed, scarfed, lapped or cut into the existing timbers using traditional pegged joints to match existing detail. Mechanical fixings to the roof frame will be acceptable or otherwise to be with agreement of supervising Architect/ Surveyor or Conservation Officer.
- 6.2.7 Generally repair of decayed members will comprise traditional methods of conservative timber to timber repair including scarfing in new pieces of timber where possible, using mechanical fastenings as required. The reinforcement of components using steel, fibre-reinforced polyester rods, epoxy resin will be subject to the agreement of supervising Architect/ Surveyor or Conservation Officer.
- 6.2.8 Timber to timber repairs will comprise either face or patch repairs comprising cutting out decayed sections of material where decay is relatively localised, and inserting new sections, or whole section repairs. Timber to timber repairs should ensure the decayed timber is cut back to a sound surface and new timber offered up and securely fixed using adhesive and/or mechanical fixings to suit. The length of the splice is governed by the section of the timber and the nature of the component being repaired, and it should be designed to ensure an effective bond between the new and existing sections of the timber.
- 6.2.9 Where possible, spliced repairs to components subject to weathering should be designed to ensure that moisture is directed towards the outer face of the timber, and that moisture cannot enter or lay on the repair joint.
- 6.2.10 When selecting a joint for full section repairs, the joint must be designed to be of sufficiency strength to perform the structural function. The replacement material should be finished to match the original profile of the host material, including any mouldings.

### 6.3 Material

- 6.3.1 New timbers for scarf repairs or to replace defective or missing components to match the original or as established by adjacent components as closely as possible to include species, density of the grain (number of growth rings), grain orientation, moisture content, growth characteristics and section conversion and orientation.
- 6.3.2 New timber should be selected from sound wood free from fungal or insect degradations, or other strength limiting characteristics, including, shakes, fissures, warping, numerous/large knots or short or irregular grain.
- 6.3.4 The surface saw marks are characteristic of the conversion methods of the material and consideration should be given to the face finish of the new material, preferably avoiding expressed saw marks by planing.
- 6.3.5 Historic slow grown softwood has considerable durability compared to modern fast grown softwood and careful inspection of each component is required to minimise unnecessary and irrecoverable loss purely on the assumption it is less durable. The selection of new softwood should seek to find a matching species and growth rate.



PHOTOGRAPHIC RECORD



internal face of west elevation



internal face of shutters to west elevation



external face of shutters to west elevation



internal face of east elevation



external face of door to east elevation



internal face of south elevation showing central posts



internal face of north elevation showing opening



PHOTOGRAPHIC RECORD



internal view of roof structure



opening and original external cladding to north elevation



haunched central posts to grain bins. Note  
pegs and mortice to receive partitions (re-  
mant of partition propped on rear wall)



tie beam morticed and pegged to posts



PHOTOGRAPHIC RECORD -components



cill plate, door post, joists and cladding



rail and cladding



mortice in post to receive cladding rails



cladding rain and mortice to receive wall post to wall plate



morticed and pegged wall plate and post



haunched and grooved grain bin post



haunched and grooved central grain bin post supporting tie beam



central grain bin prop supporting tie plate to be removed



PHOTOGRAPHIC RECORD -components



haunched and grooved central grain bin post supporting tie beam. NB brackets to be removed



cill plate pegged (alternate) and lapped over joists



tongue and groove floorboards



staddle stone supporting girder



morticed and pegged wall plate and post



girder supporting joists resting on staddle stone



shaped end to girders (resting on inserted prop)



mortice and peg in grain bin post to receive partition and remnant of grain bin partition





PHOTOGRAPHIC RECORD -components



nailed tongue and grooved floor boards



trenched purlin over collar (rafter appears lapped) Collar may be later



morticed and pegged post to tie beam



dovetail joint to tie beam to wall plate with twisted forged strap for restraint



skew fixed nailed jack rafters to hip rafter

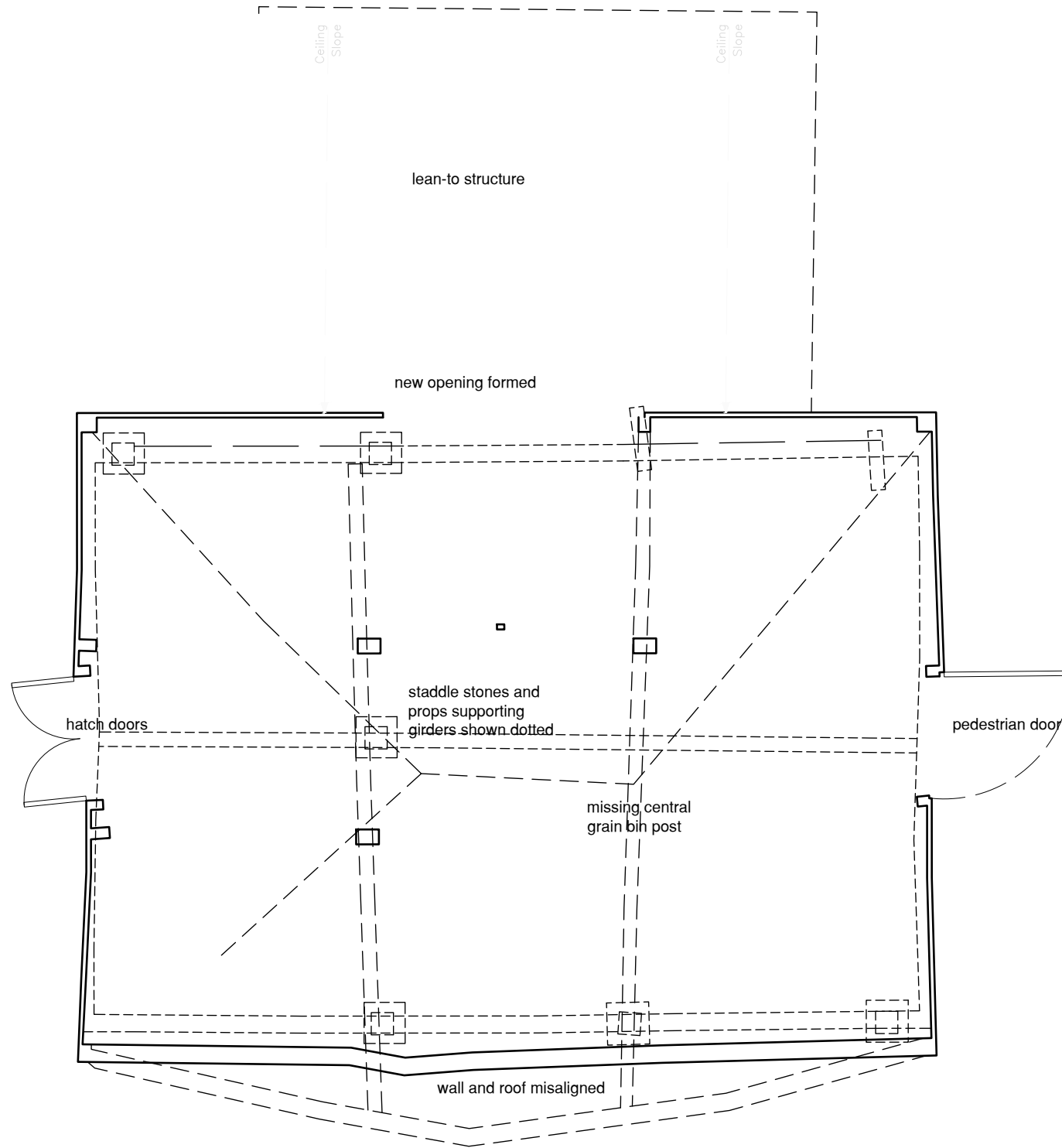
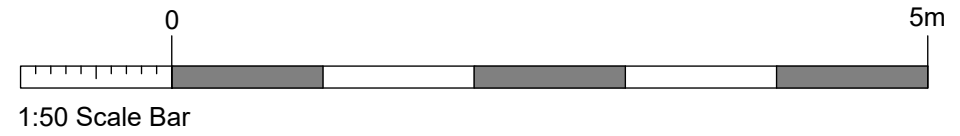
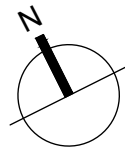


original pegged collar to rafter. Note red riddle pencil carpenter's marks rather than scribed with chisel suggestive of successive alteration to roof



splayed rafter feet with nailed soffit board (displaced)





**NOTES:**

Report all discrepancies, errors and omissions.

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See relevant drawings for all specialist work.

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Rev	Date	Description
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Catesby Estates  
 Granary Reconstruction  
 Land at Grove Road  
 Headcorn

Drawing Description  
 Survey Floor Plan

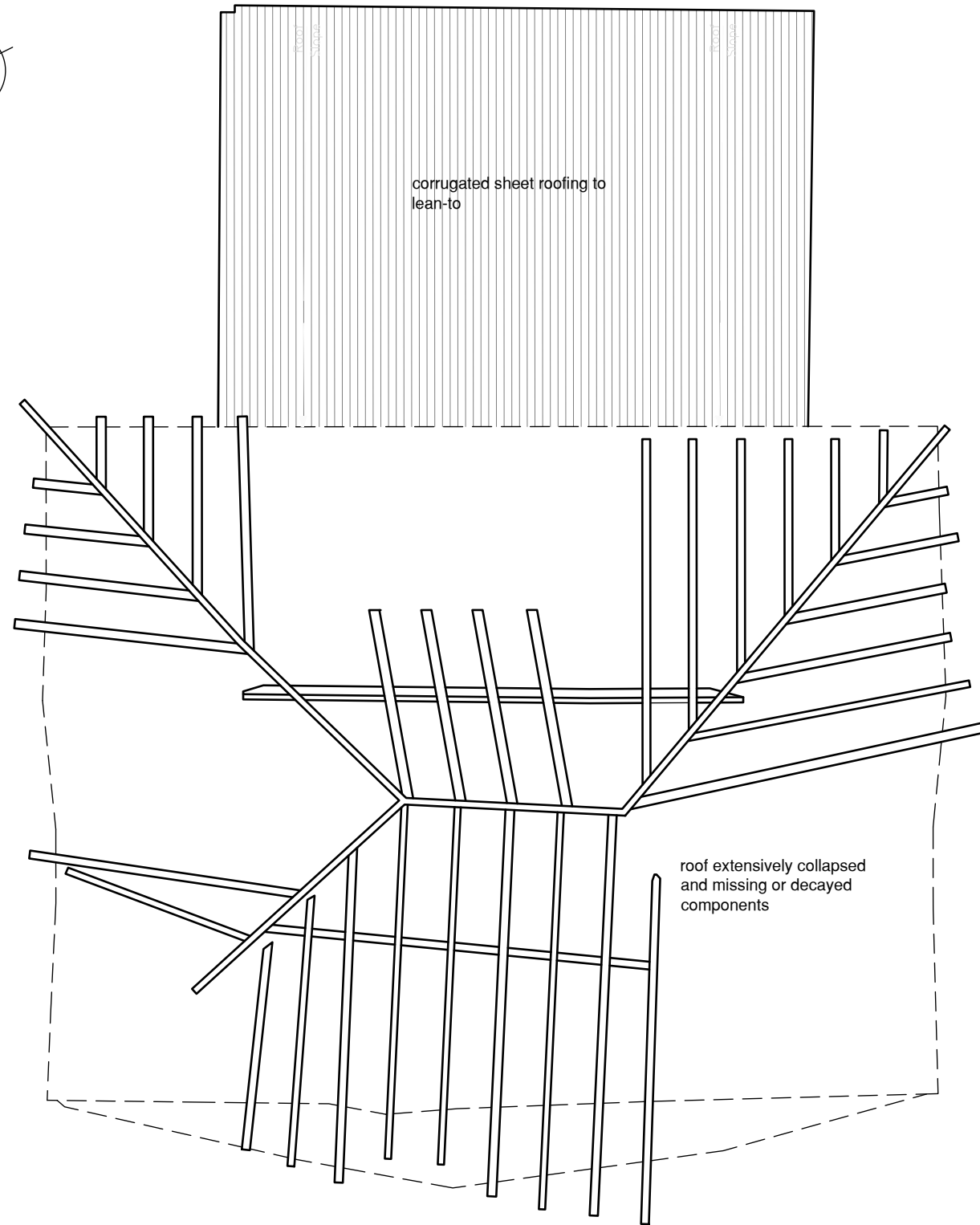
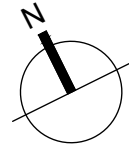
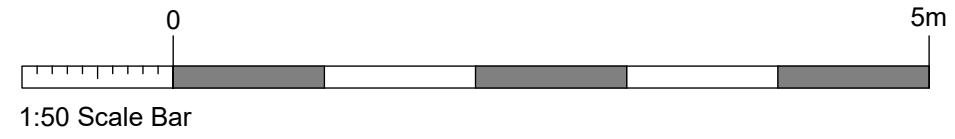
Scale  
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Date	Drawn By
November 2024	TPS

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Drawing Number	Revision
27780_001	-



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Rev	Date	Description
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Catesby Estates  
Granary Reconstruction  
Land at Grove Road  
Headcorn

Drawing Description  
Survey Roof Plan

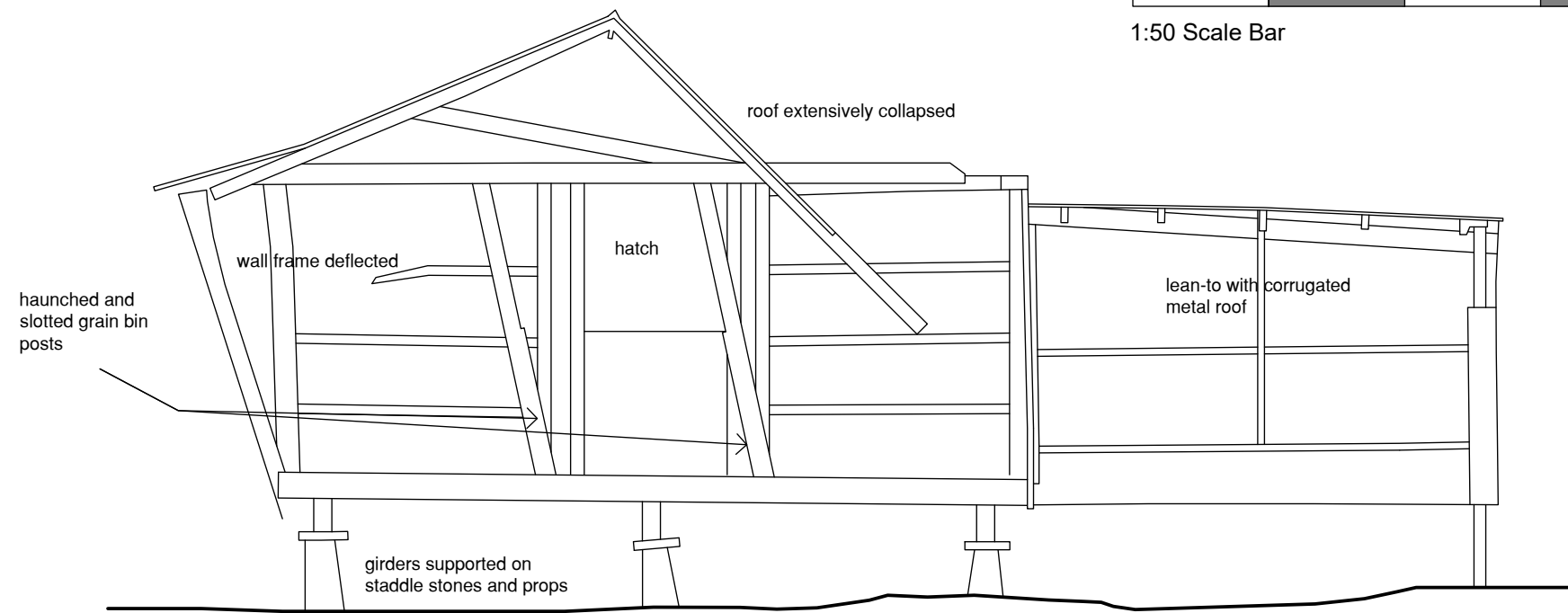
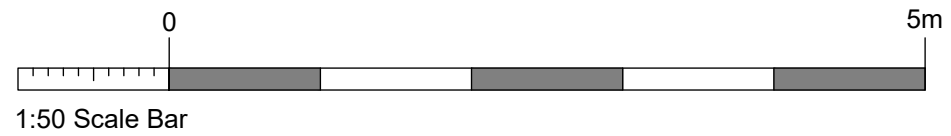
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November 2024	TPS

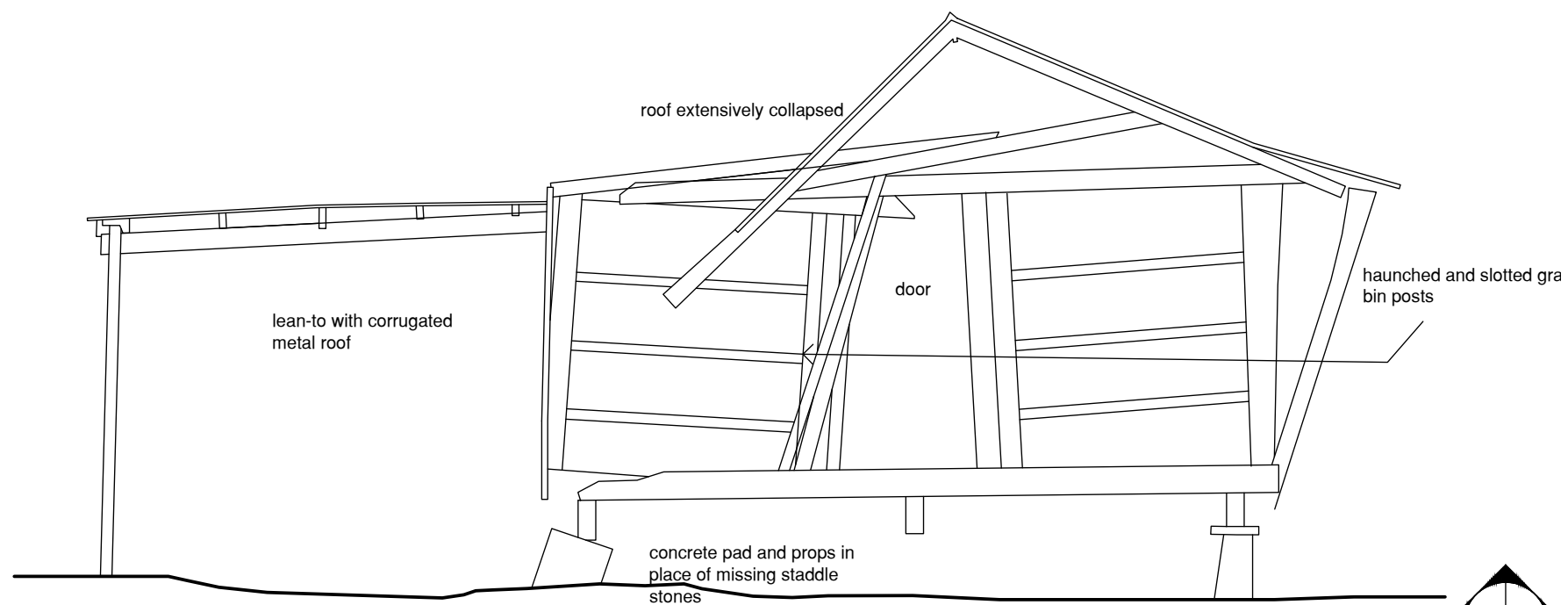
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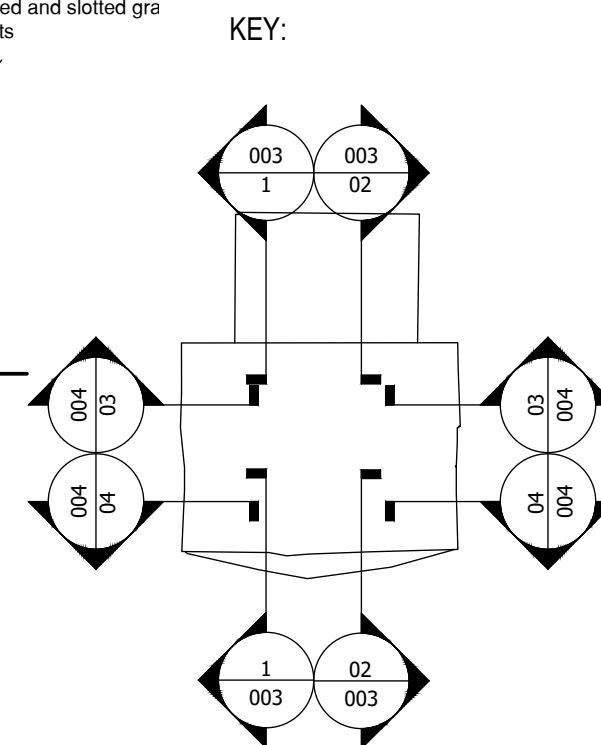
Drawing Number	Revision
27780_002	-



SECTIONAL ELEVATION 1



SECTIONAL ELEVATION 2



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Rev	Date	Description
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Catesby Estates  
Granary Reconstruction  
Land at Grove Road  
Headcorn

Drawing Description  
Survey Cross Sections 1 & 2

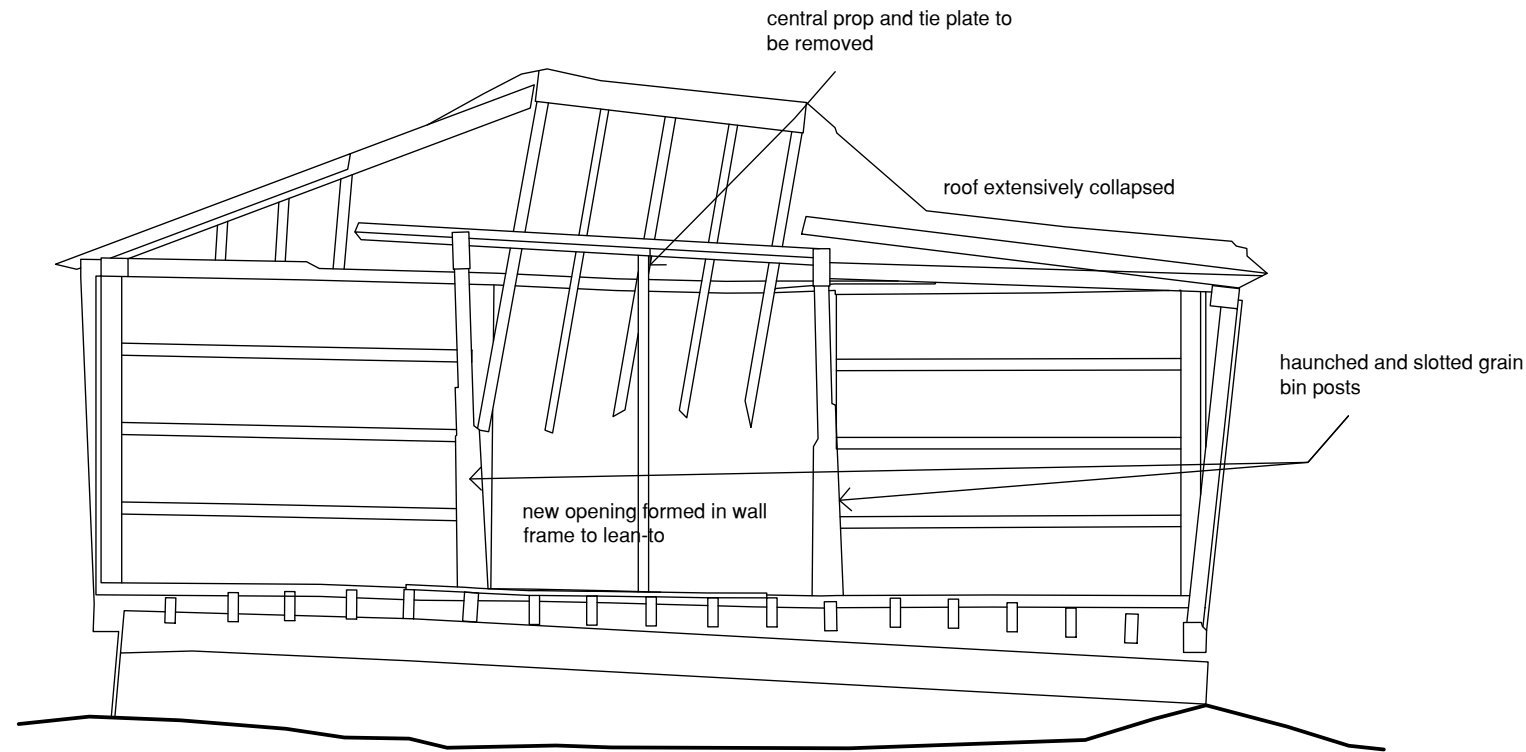
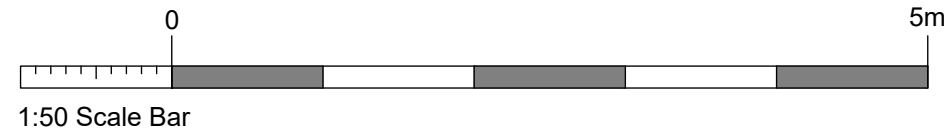
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Date November 2024  
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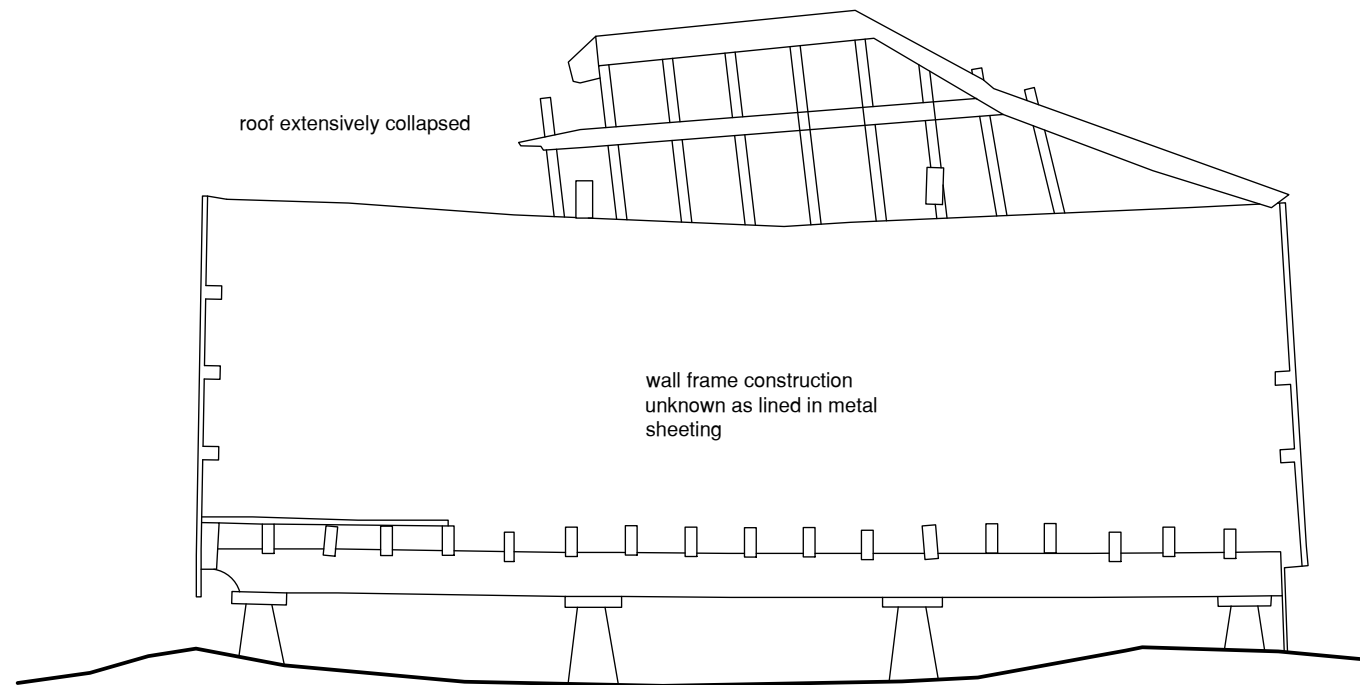
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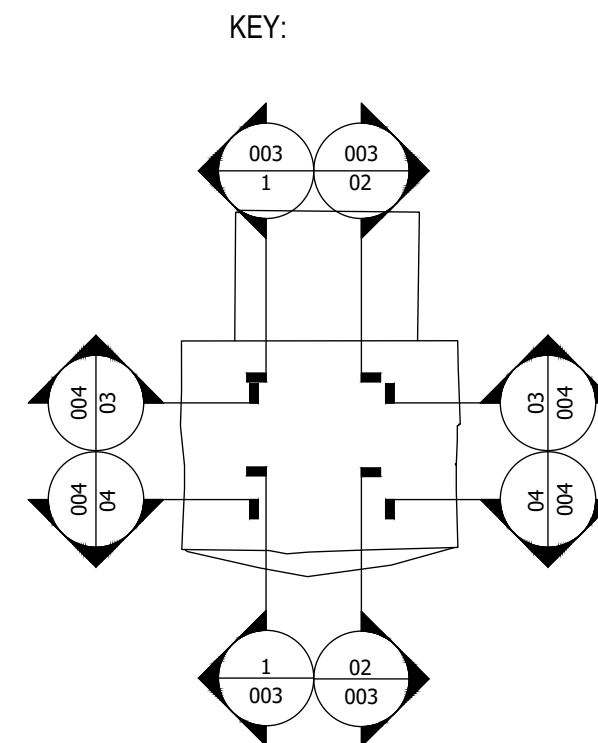
Drawing Number	Revision
27780_003	-



SECTIONAL ELEVATION 003



SECTIONAL ELEVATION 004



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Rev	Date	Description
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Catesby Estates  
Granary Reconstruction  
Land at Grove Road  
Headcorn

Drawing Description  
Survey Cross Sections 3 & 4

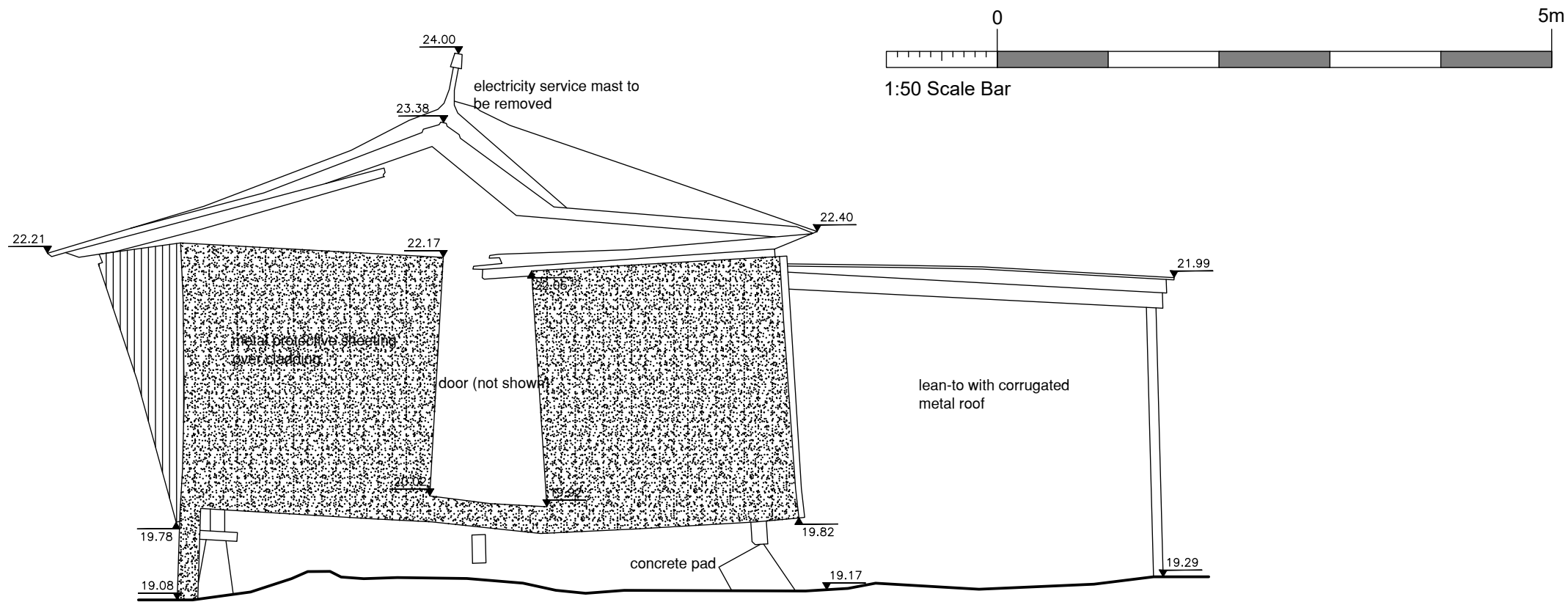
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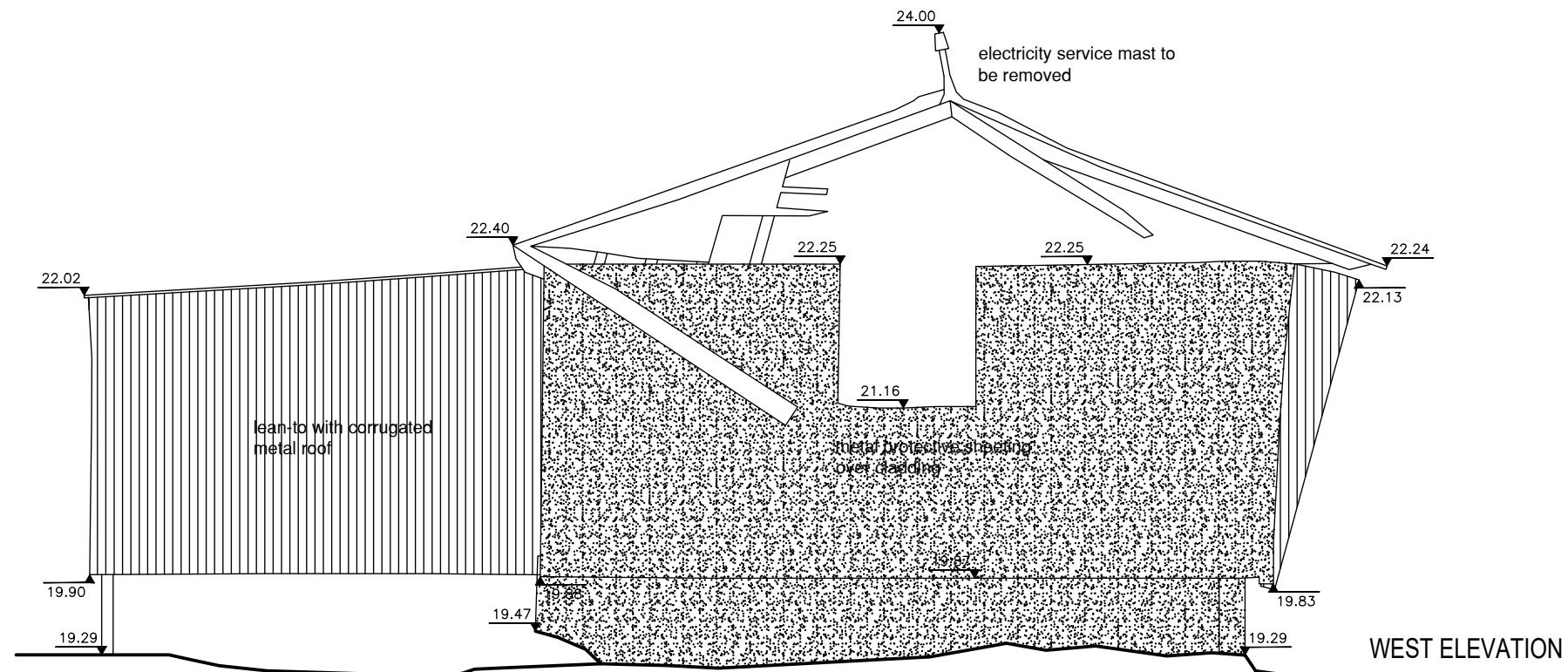


EAST ELEVATION

Datum @18.00m AOD



ELEVATION



WEST ELEVATION

Datum @18.00m AOD



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Rev	Date	Description
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Catesby Estates  
 Granary Reconstruction  
 Land at Grove Road  
 Headcorn

Drawing Description  
 Survey Elevations East & West

Scale  
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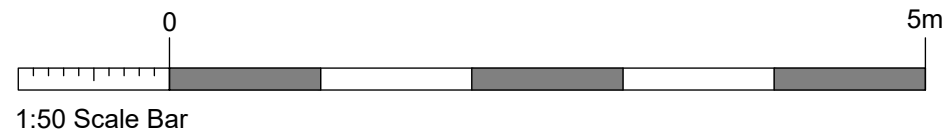
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27780_005	-



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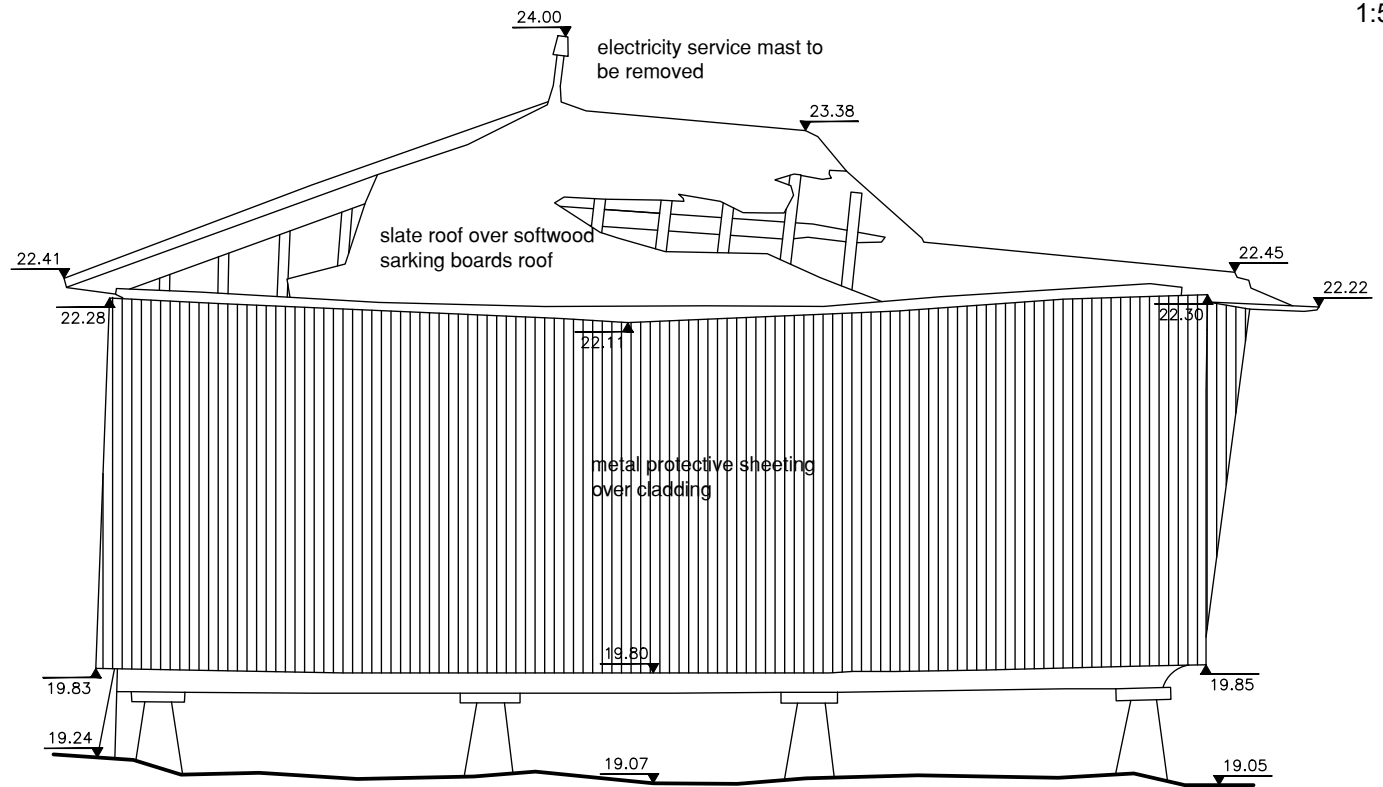
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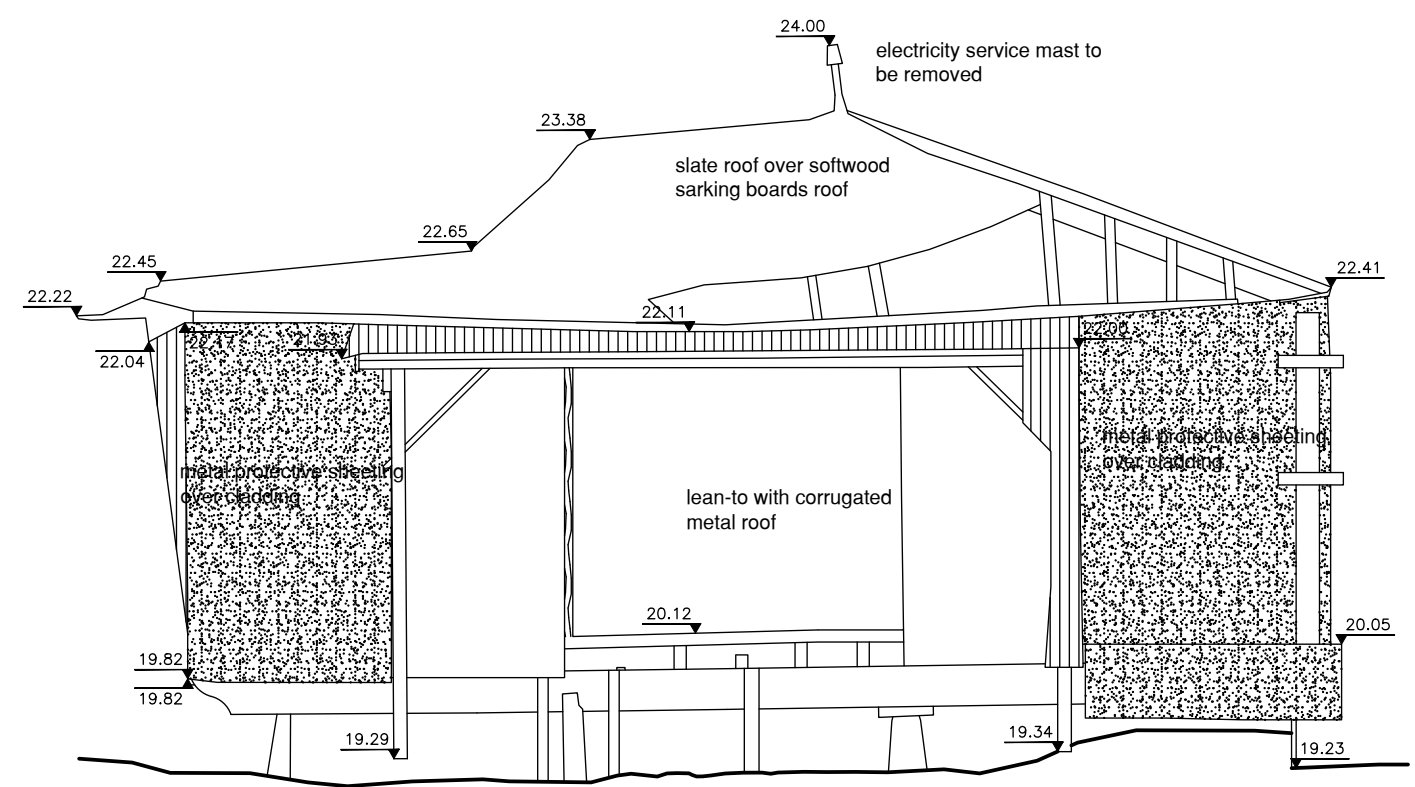
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SOUTH ELEVATION

Datum @18.00m AOD



NORTH ELEVATION

Datum @18.00m AOD

Rev	Date	Description

Catesby Estates  
 Granary Reconstruction  
 Land at Grove Road  
 Headcorn

Drawing Description  
 Survey Elevations North & South

Scale  
 1:50 @ A3

Date  
 November 2024

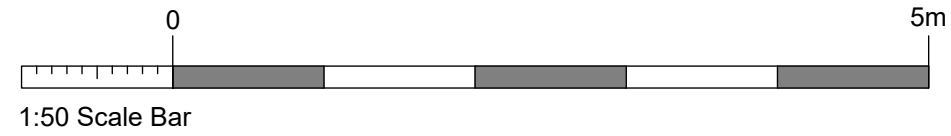
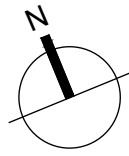
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27780_006	-





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Rev	Date	Description
A	Jan 2025	text correction

Catesby Estates  
**Granary Reconstruction**  
 Land at Grove Road  
 Headcorn

Drawing Description  
**Proposed Floor Plan**

Scale  
 1:50@A3

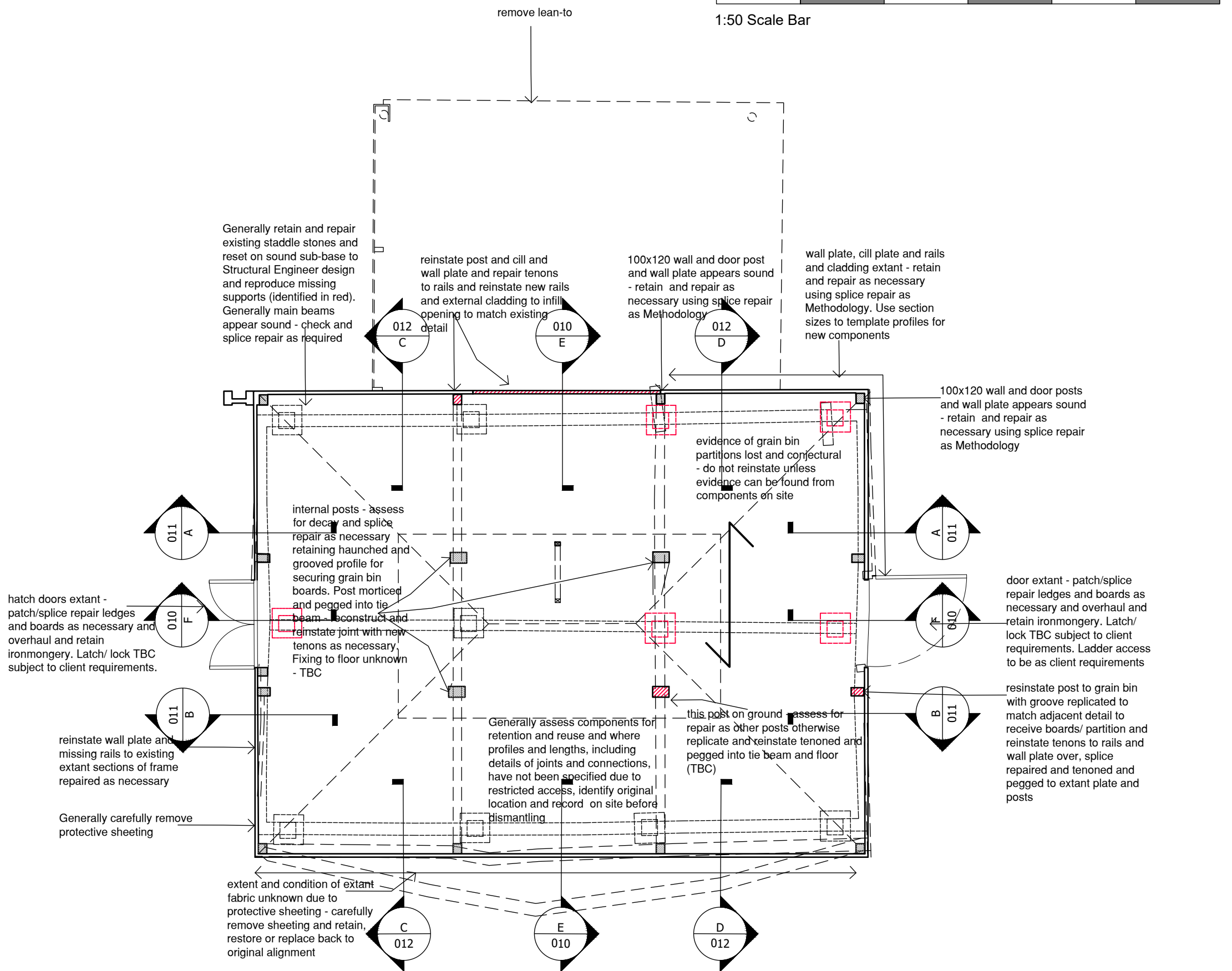
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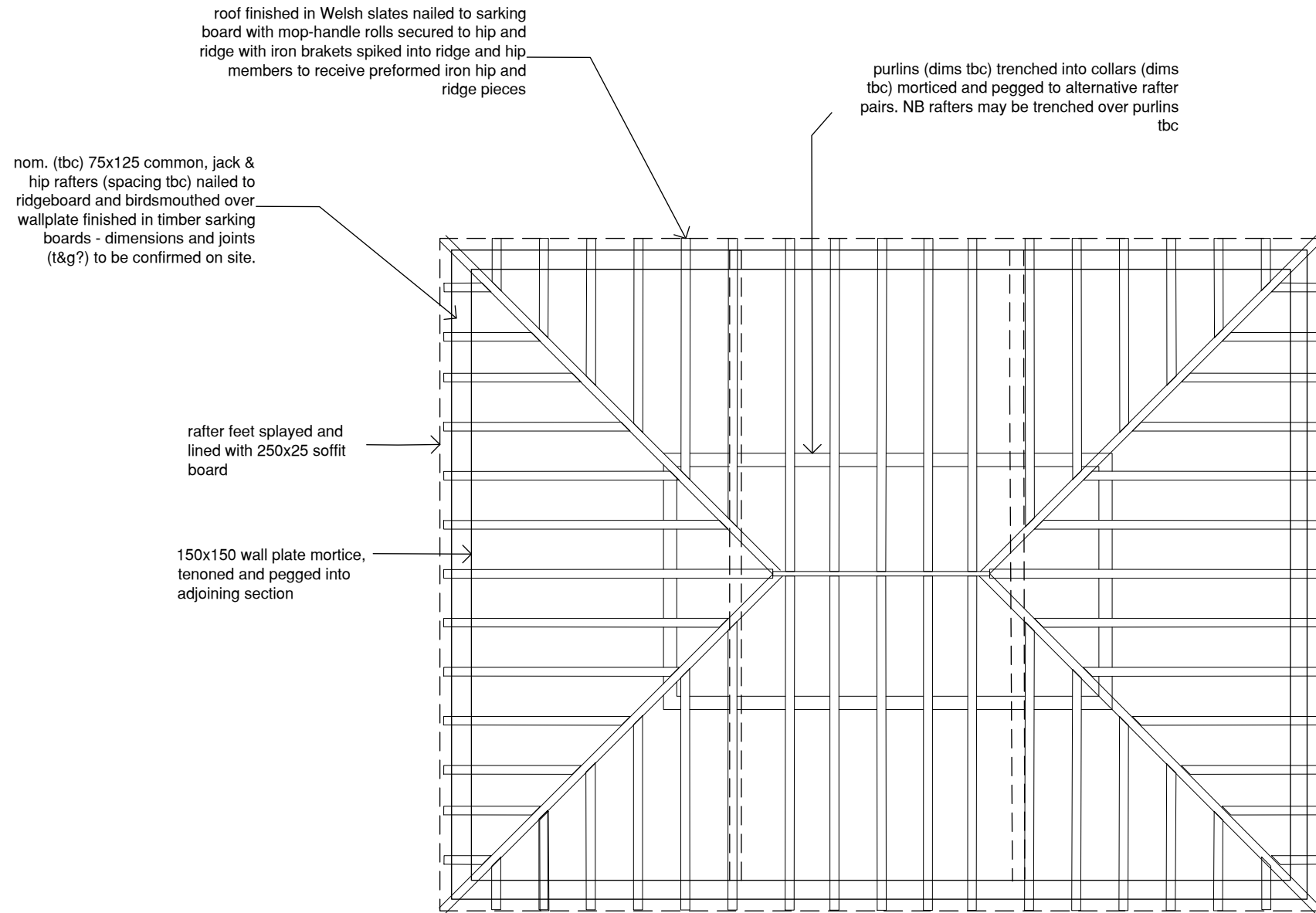
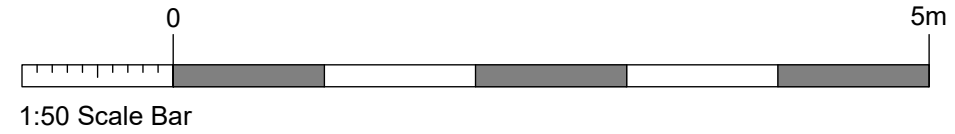
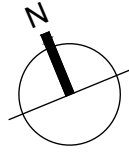
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Rev	Date	Description
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Catesby Estates  
**Granary Reconstruction**  
 Land at Grove Road  
 Headcorn

Drawing Description  
**Proposed Roof Plan**

Scale  
 1:50@A3

Date	Drawn By
November 2024	TPS

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Rev	Date	Description

Catesby Estates  
 Granary Reconstruction  
 Land at Grove Road  
 Headcorn

Drawing Description  
 Proposed Elevations

Scale  
 1:50@A3

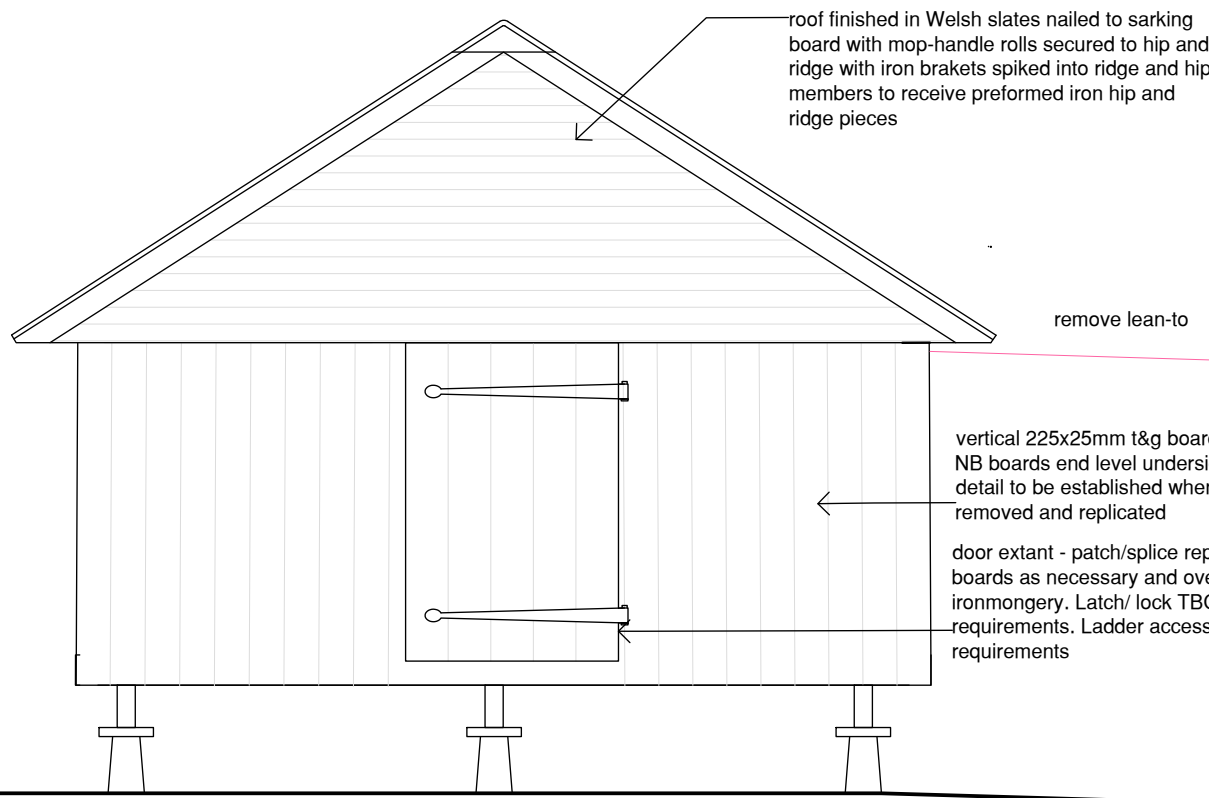
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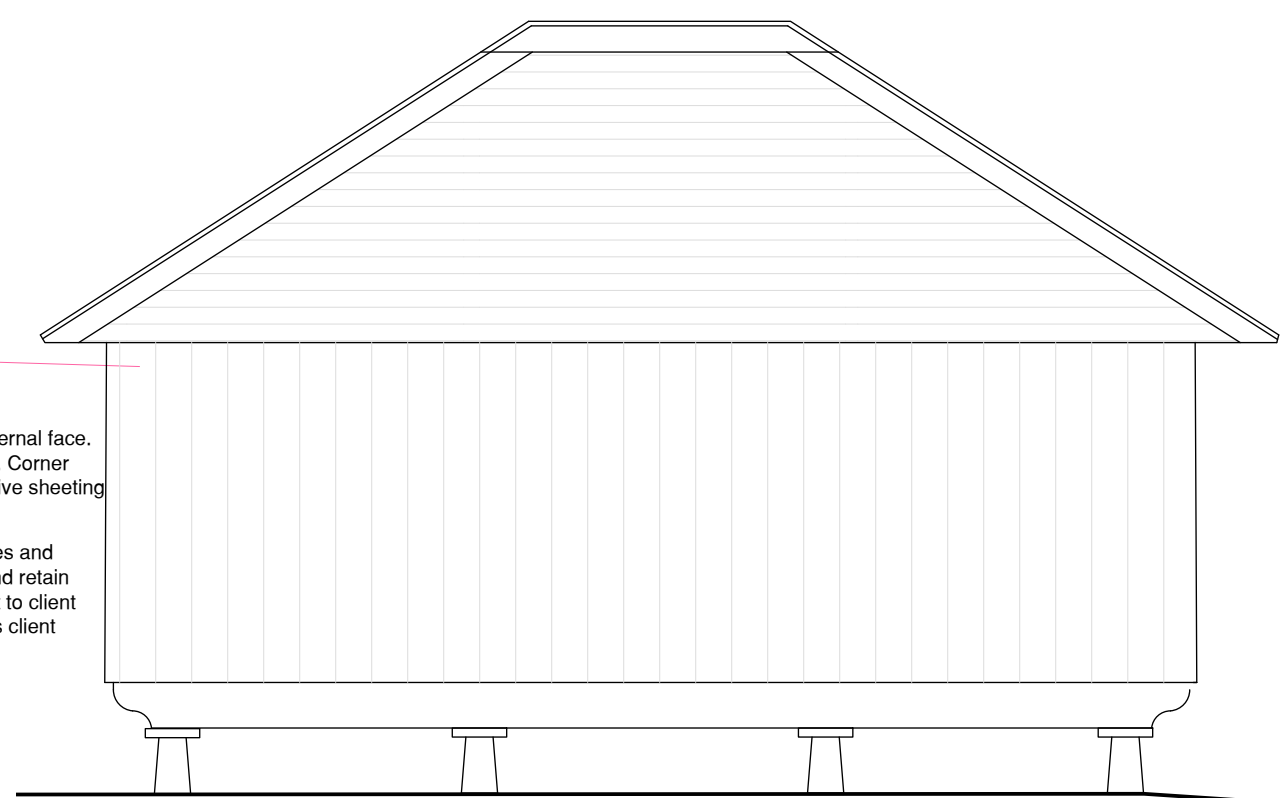
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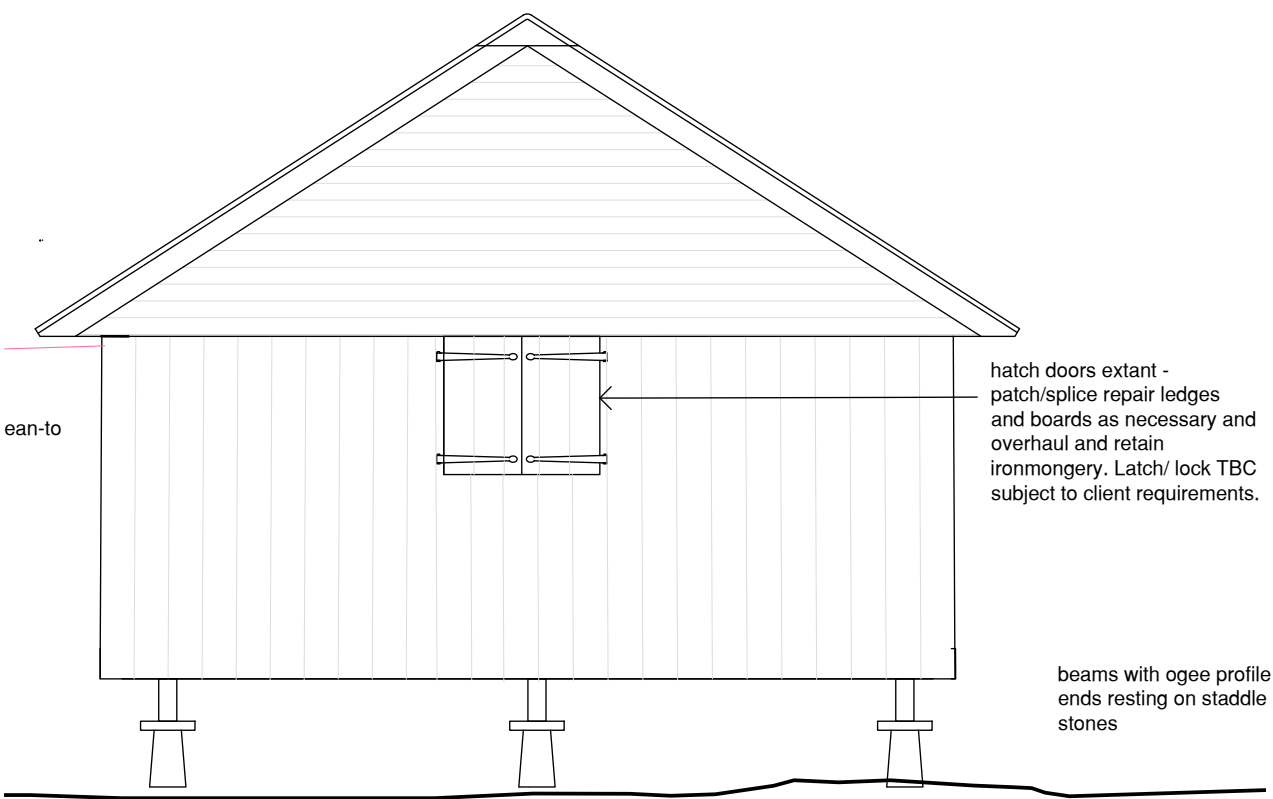
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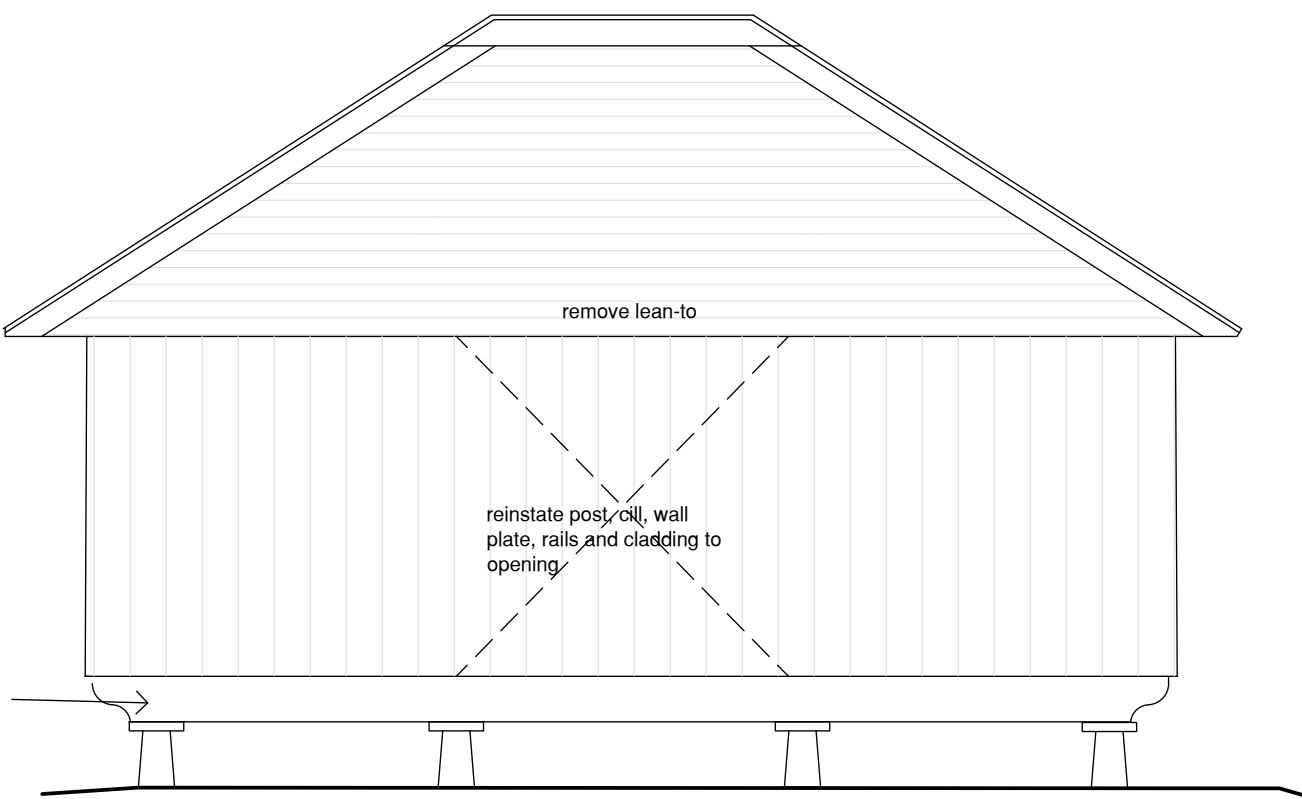
PROPOSED EAST ELEVATION



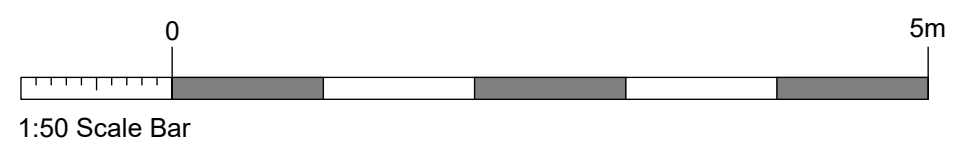
PROPOSED SOUTH ELEVATION

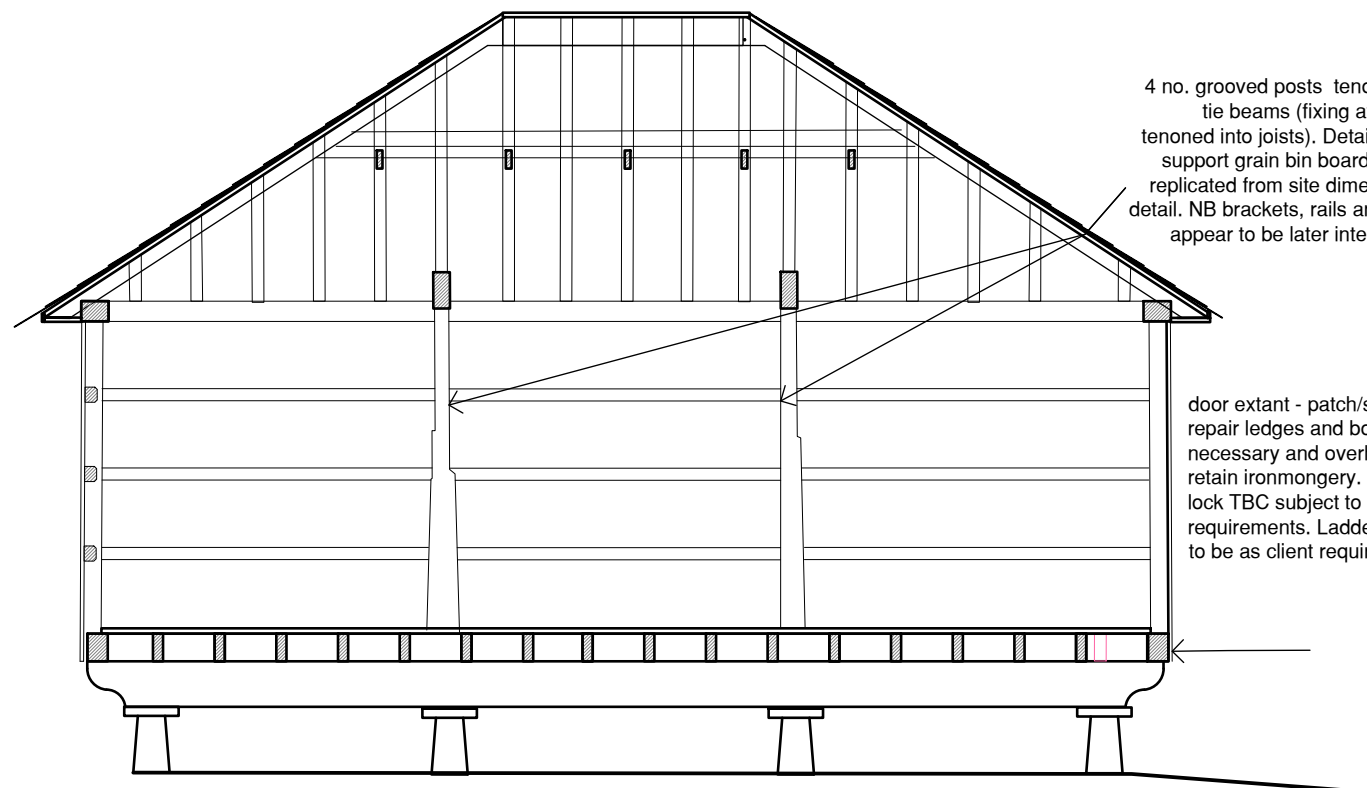


PROPOSED WEST ELEVATION



PROPOSED NORTH ELEVATION





4 no. grooved posts tenoned and pegged into tie beams (fixing at floor tbc - presumed tenoned into joists). Detail of original groove to support grain bin boards and partitions to be replicated from site dimensions and indicative detail. NB brackets, rails and intermediate posts appear to be later intervention and are not shown

door extant - patch/splice repair ledges and boards as necessary and overhaul and retain ironmongery. Latch/lock TBC subject to client requirements. Ladder access to be as client requirements

roof finished in Welsh slates nailed to sarking board with mop-handle rolls secured to hip and ridge with iron brackets spiked into ridge and hip members to receive preformed iron hip and ridge pieces

CROSS SECTION FF

purlins (dims tbc) tenoned into collars (dims tbc) morticed and pegged to alternative rafter pairs. NB rafters may be tenoned over purlins tbc

nom. (tbc) 75x125 common, jack & hip rafters (spacing tbc) nailed to ridgeboard and birdsmouthed over wallplate finished in timber sarking boards - dimensions tbc and butt jointed?  
2 no. 240x110 tie beam half lapped dovetail jointed to wall plate and secured with twsited wrought iron strap

4 no. grooved posts tenoned and pegged into tie beams (fixing at floor tbc - presumed tenoned into joists). Detail of original groove to support grain bin boards and partitions to be replicated from site dimensions and indicative detail. NB brackets, rails and intermediate posts appear to be later intervention and are not shown

rafter feet splayed and lined with 250x25 soffit board

150x150 wall plate mortice, tenoned and pegged into adjoining section

100x120 wall and door posts morticed into cill and wall plate (or end joist)

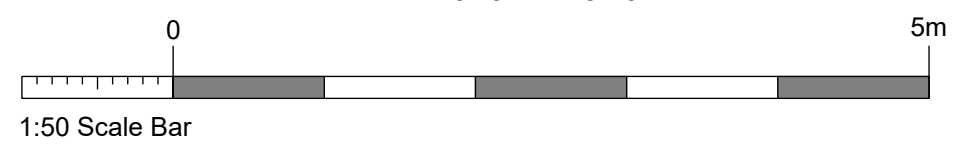
80x100 chamfered rails morticed into posts supporting (mid rail pegged) vertical 225x25mm t&g boards to external face. NB boards end level underside joists. Corner detail to be established when protective sheeting removed and replicated

80x120 cill plate sitting on joist ends only part lapped and pegged alternate joists

80x200 joists @ 420c/cs supporting 225x35 t&g floorboards (nailed)

260 varies

CROSS SECTION EE



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Rev	Date	Description

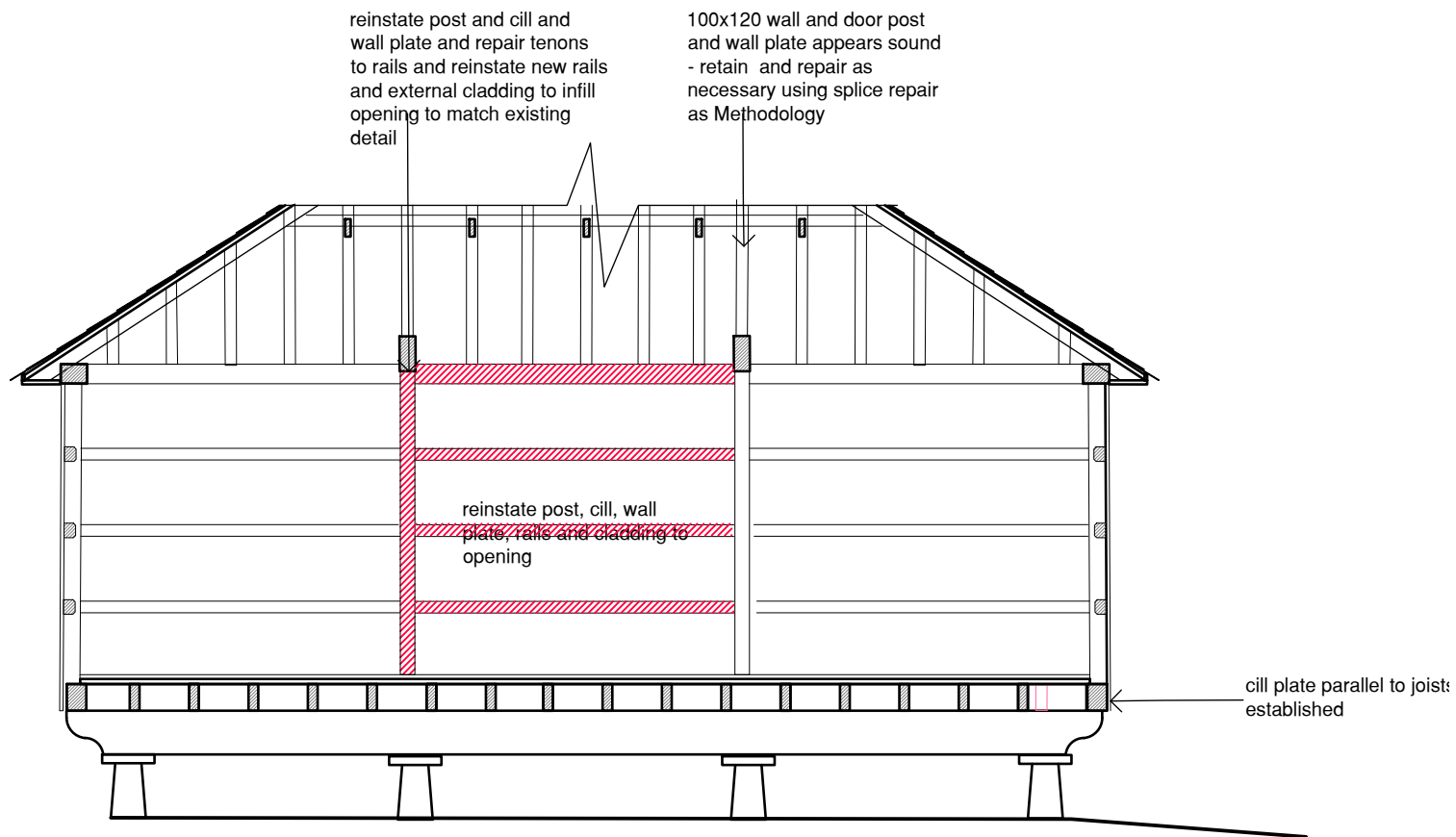
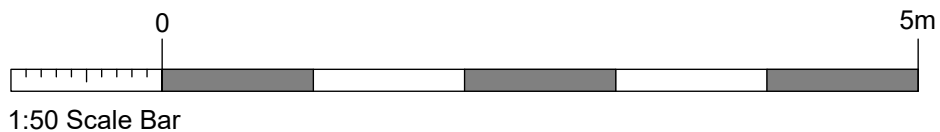
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Granary Reconstruction  
Land at Grove Road  
Headcorn

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Proposed Reconstruction  
Cross-Sections  
  
Scale  
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Date  
November 2024  
  
Drawn By  
TPS

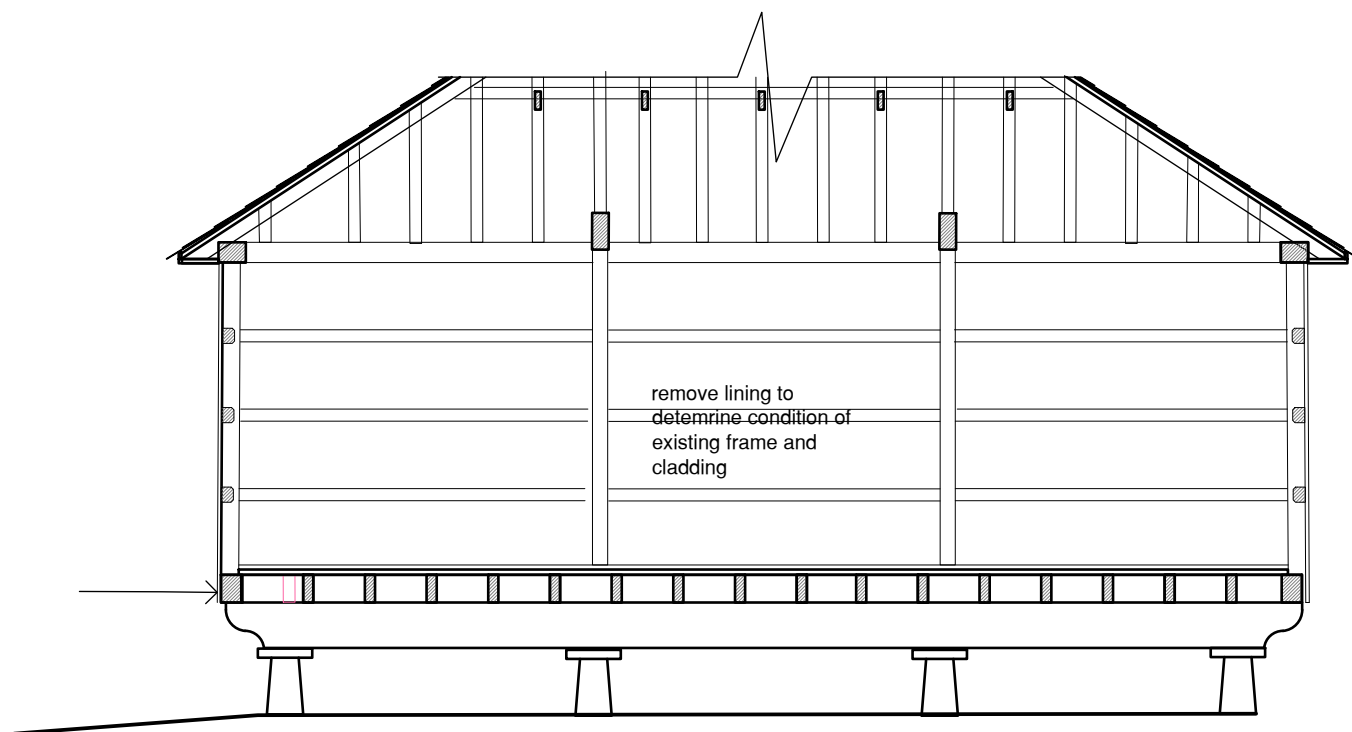
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27780\_010  
  
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INTERNAL ELEVATION AA



INTERNAL ELEVATION BB

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Rev	Date	Description
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Catesby Estates  
 Granary Reconstruction  
 Land at Grove Road  
 Headcorn

Drawing Description  
 Proposed Reconstruction  
 Internal Elevations AA BB

Scale  
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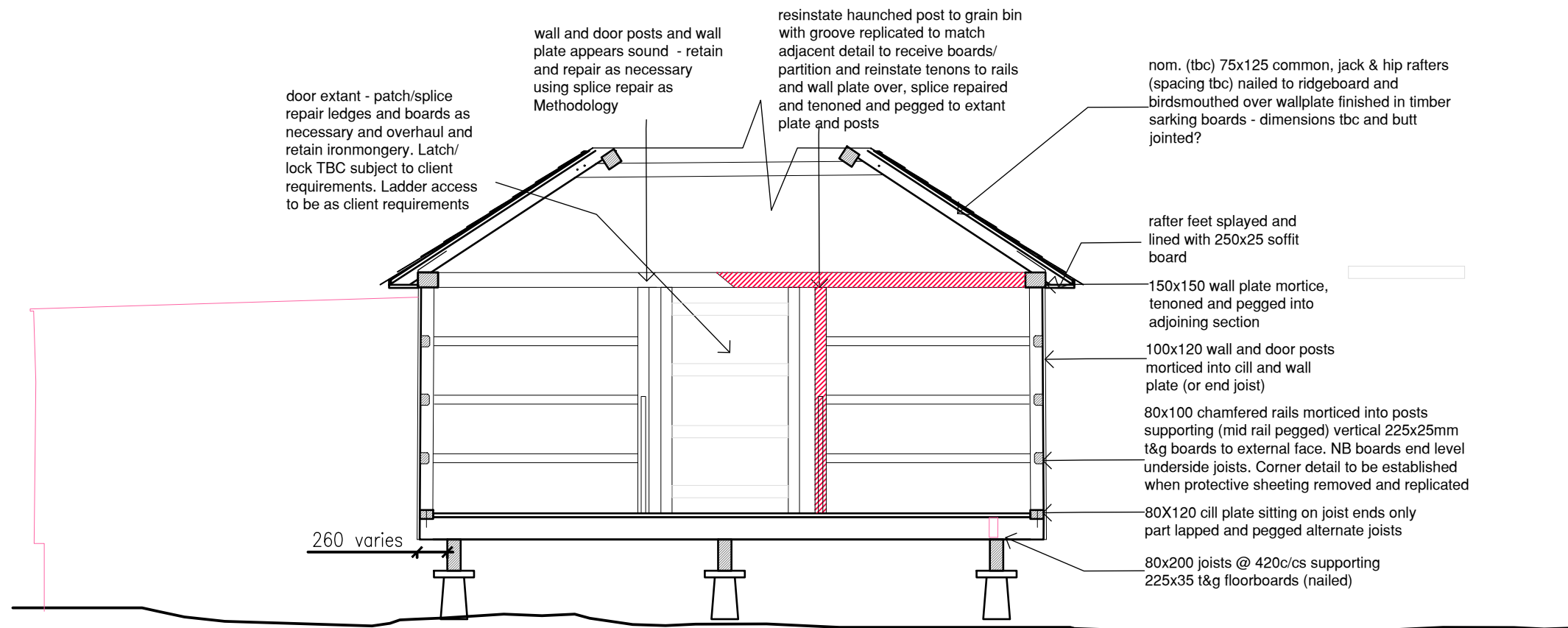
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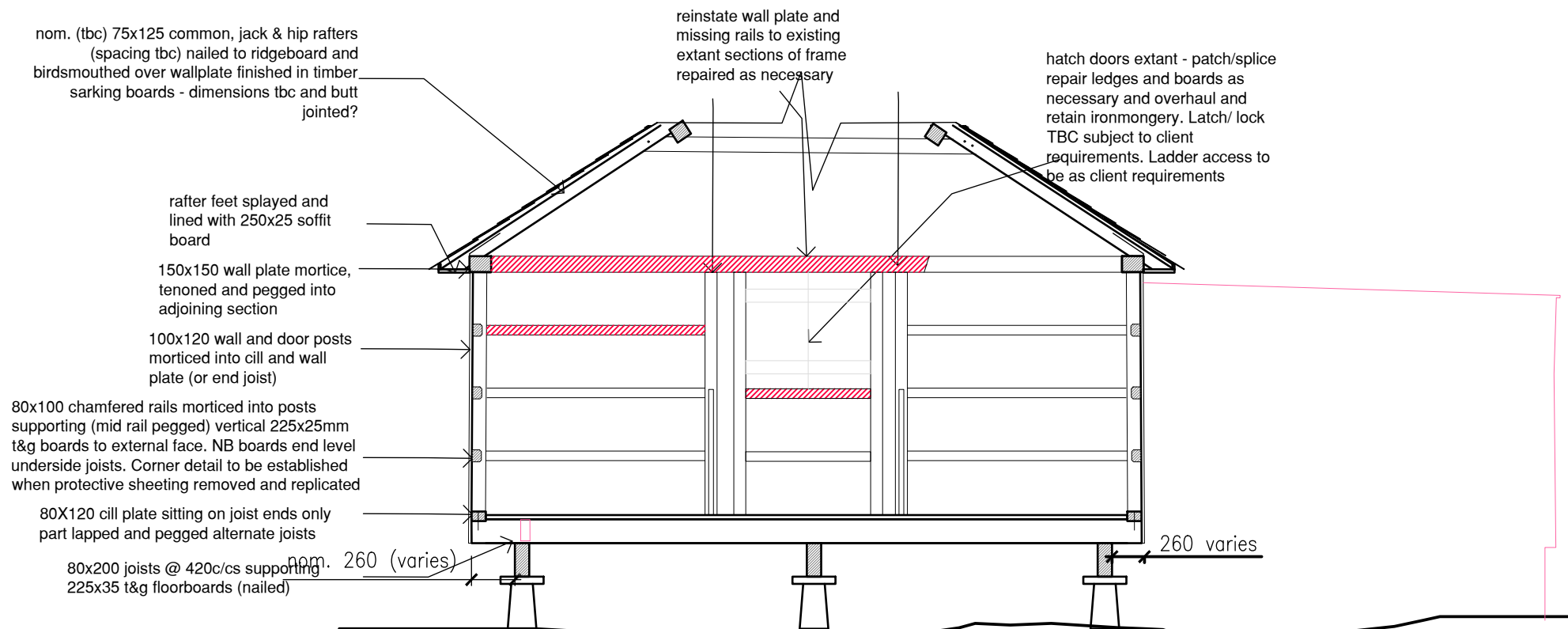
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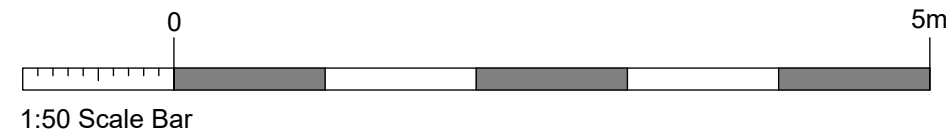
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INTERNAL ELEVATION DD



INTERNAL ELEVATION CC



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Rev	Date	Description
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Catesby Estates  
Granary Reconstruction  
Land at Grove Road  
Headcorn

Drawing Description  
Proposed Reconstruction  
Internal Elevations CC DD

Scale  
1:50@A3

Date Drawn By  
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27780\_012 -

## Appendix 5: Assessment of Headcorn Conservation Area

### 6. Headcorn Conservation Area

- 6.1. It is now common ground between the Appellant and the LPA that the heritage significance of the Conservation Area will not be harmed by the housing of the proposed development.
- 6.2. The Headcorn Conservation Area was designated in 1977 by Maidstone Borough Council and is shown in Plate 34, with additions of 2024.



*Plate 34 Headcorn Conservation Area boundary map (Source: Maidstone Borough Council)*

- 6.3. The Conservation Area has a Conservation Area Appraisal and Management Plan (CAAMP) dated January 2022 which was adopted in November 2024 (CD 8.25).
- 6.4. This document identifies two distinct parts of the conservation area; the high density bustling High Street and the area around the Church of St Peter and St Paul, a Grade I Listed Building, bookending the western end of the main street.
- 6.5. The High Street is on an east-west axis and remains the commercial heart of the village. It has back of pavement buildings lining its northern side, and some green verges and front gardens





to properties on its southern side. Buildings are predominantly two storey in height, eaves on to the road reflecting the early burgh layout of the market village. Buildings display a plethora of different styles along the high street. Tall Flemish style gable fronted buildings and jettied upper storeys punctuate the streetscene. Small gable end or ridge chimney stacks pepper the plain clay tiled roofs. A variety of shop fronts reinforce the commercial history and character of the main street. There are few areas of greenspace in this part of the Conservation Area.

- 6.6. By contrast, the western area, to the west of North Street has large areas of green space, primarily the church yard of 13<sup>th</sup>-century Church of St Peter and St Paul, but also large areas of public open space to the south, and private gardens. Roads are mostly narrow. Buildings in this character area are predominantly residential. Some cottages date to the 16<sup>th</sup> and 17<sup>th</sup> century, and many have white weatherboarded elevations and large verdant gardens.
- 6.7. The Grade II Listed The Moat is **not** included within the Conservation Area, lying approximately 85m to the north-west of the area.
- 6.8. The Conservation Area Appraisal notes the road (A274) between Maidstone and Tenterden, as well as the location of the settlement on the edge of the floodplain of the River Beult and its origins as a clearing in a forest in relation to the setting of the asset. I would agree that the road and river contribute, as well as the railway, which was also crucial to the later development of the area.
- 6.9. The CAA also mentions views and approaches in a separate section. These include views from Tong Bank, to the north, which whilst they do not include Headcorn in the view are said to show fields of its setting.
- 6.10. From my visits to the area, I consider that some elements of the wider agricultural land contribute, including that which the asset has a visual relationship with, such as that west of Gooseneck Lane and south of Moat Road.
- 6.11. The approaches and views sections of the Conservation Area Appraisal and Management Plan also gives a plan of the principal views on the approaches into Headcorn which should be protected, or improved and protected (Plate 35).



**Principal Views approaching and within Headcorn**

*Plate 35 Extract from the Conservation Area Appraisal and Management Plan*

6.12. The identified principal views are given as:

- Views approaching Headcorn from the North – views 2 and 3
- Views approaching from the West – views 1 and 4
- Views approaching Headcorn along Moat Road
- Views approaching from the southeast – views 5, 6 and 7
- Views on the approach from the east
- Views from within the conservation area – views 8 and 9

6.13. With regards to the views along Moat Road, one lies some distance to the west of the site, and the other appears to be south of Moat Road, south of the site (although the scale of the plan precludes precise location). Photographs given in the document illustrate further views (Plate 36) (although I note these are taken from Google StreetView, so are taken from a higher level than pedestrian or car passenger/driver views). None of these views encompass the main area of the site, some would have filtered views to the site through vegetation in the winter, and some of the hoarding on the southern edge of the site is visible in another.

**Moat Road – approaching Headcorn from the West – 1 and 4**



**View of the approach to Headcorn along Moat Road**

*Plate 36 Extract from the Conservation Area Appraisal*





6.14. The accompanying text states:

*This in many ways is a more interesting approach to Headcorn. The lane meanders along its route though stays broadly parallel to the slope to the north. It passes through some very picturesque countryside until the hedges, so much a feature of this area, appear as Headcorn comes closer. There is a momentary change in elevation as the road crosses the School river – though it's easy to miss – and then after a final bend the outskirts of Headcorn come into view. Approaching from this direction there is very little development along the road and the traveller is straightaway close to the centre of the village without passing through a hinterland as is found on the Maidstone Road. The first sight of Headcorn is the charming, mostly, row of cottages close to the junction with North Street. This arcadian approach to the town has remained as a gentle introduction to the village for nearly two centuries. It is an important set of views, that would at one time have also been found travelling along Maidstone Road, and are worthy of protection both from development and invasive street furniture and signage.*

6.15. With regards to the Moat Road approach to the Conservation Area, I would say that the site frontage is part of the hedge-flanked approach, rather than the 'picturesque countryside' (or arcadian approach), and the presence of the hoarded-off buildings and substation north of Moat Road which bookend the hedge south of the site should also be noted (Plates 36 to 37).



*Plate 37 Hoarding and derelict buildings on the site frontage*



*Plate 38 Electrical substation to the west of the site frontage*



- 6.16. The reference to picturesque countryside and arcadian approach is more likely to refer to the land to the south of Moat Road, over which there are more open views to the fields and Church (Plate 39).



*Plate 39 Land south of Moat Road*

- 6.17. With regards to the development on this approach, I note that the Moat Road approach into Headcorn takes in the large modern house north of Moat Road, which lies beyond the Conservation Area (Plate 40).



*Plate 40 Modern residence west of the Conservation Area on Moat Road*

- 6.18. The site is not visible from inside the Conservation Area, nor the edge of it. It is little experienced in dynamic views along Moat Road, due to the hedgerow screening. The most readily visible element is the group of derelict buildings in the south-eastern corner and hoardings, which detract from the experience of the approach.
- 6.19. The footpath through the site is used, but few people appear to go through the hedgerow onto Moat Road (there is no footway, and a reasonable amount of traffic). The gap in the hedge is very overgrown, suggesting relatively little use.
- 6.20. There are some views to the Church which lies within the Conservation Area from within the site, but these are not views in which the context of the church in relation to the Conservation Area can be understood (Plate 41).





*Plate 41 Looking south-east to the Church from within the site*

- 6.21. Highly unusually, the Conservation Area Appraisal has a figure which is not in earlier drafts (including those consulted upon), termed '*Development in these areas would seriously impact the setting of the conservation area*' (Plate 42), which includes the southern area of the site. This appears at the end of the section on *Description and Analysis of the Conservation Area*, rather than any sections addressing setting, or development management. It appears to be contrary to the analysis within the remainder of the document and appears contrary to the LPA's allocation of the Moat Road site for approximately 110 dwellings, and it appears contrary to the LPA's case for this appeal.





*Plate 42 Figure from Conservation Area Appraisal, titled "Development in these areas would seriously impact the setting of the conservation area"*

- 6.22. Taking into account my analysis and the analysis given in the remainder of the adopted Conservation Area Appraisal and Management Plan, I do not agree with this illustration.

Statement of significance

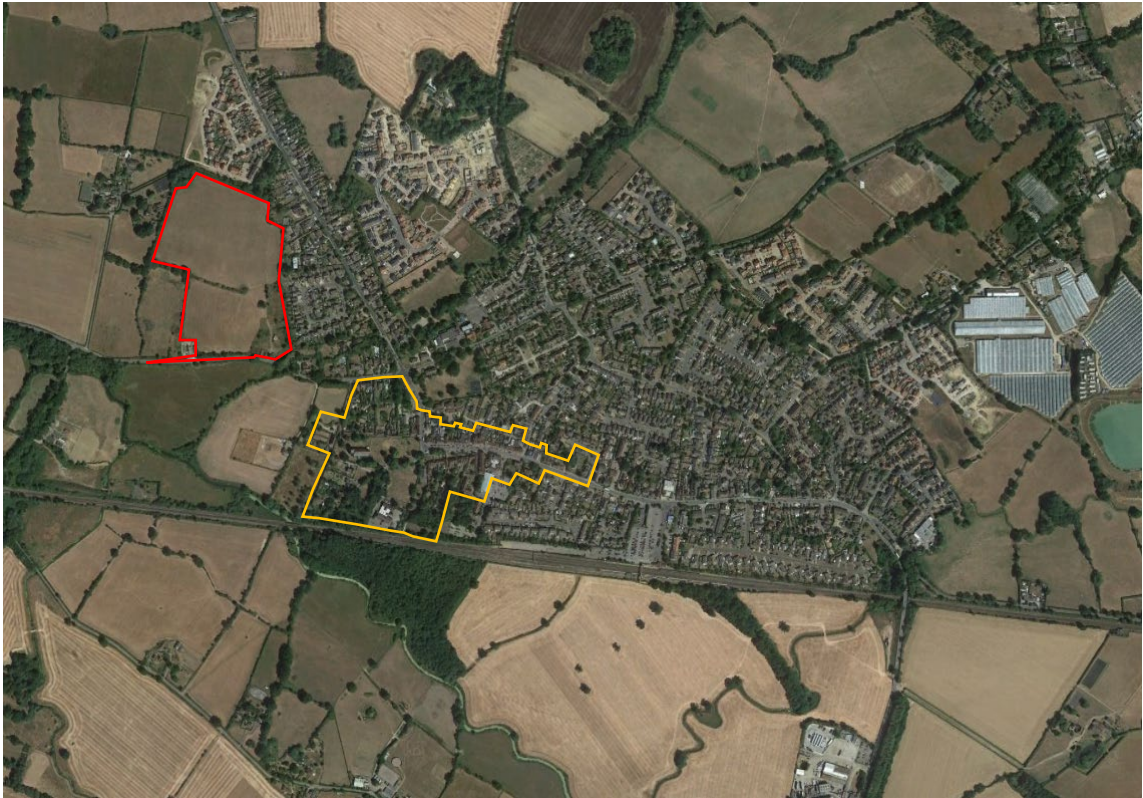
- 6.23. The significance of the Headcorn Conservation Area is principally derived from its buildings, layout, grain and spaces within its bounds. As a sum of many parts, it has historic, architectural, and archaeological interests. The well-preserved layout of its historic core stems from its medieval origins which has informed the density and urban grain of the High Street. The western end of the village has a more open character within the area with the Grade I Listed Church of St Peter and St Paul at its centre, and houses facing onto the churchyard and green. Cottages, farmhouses, and manors alike are rooted in their local rural context with the use of locally sourced timber and clay exploited for construction and roofing and walling materials.
- 6.24. While there is currently no statutory protection for the settings of Conservation Areas, it is evident that elements of the surrounds of the Conservation Area make some contribution to its significance, albeit less than the structures and spaces within its boundaries. Principal elements of the physical surrounds and experience of the asset (its setting) which are considered to contribute to its heritage significance comprise:
- The River Beault to the south – the village developed at the edge of its flood plain which has been cultivated so the river has had a great deal of influence in the location, layout and economy of small market settlement;



- The railway running between the flood plain and the village core – train travel came to Headcorn in 1842 and catalysed the village’s development and reduced dependence on the agricultural economy;
- Some elements of the adjacent agricultural landscape, such as land to the south of Moat Road and east of Gooseneck Lane, which the houses on Gooseneck Lane have clear views over.
- Some elements of the later settlement of Headcorn, which illustrate how the settlement has evolved from its historic core.

Any contribution of the site

- 6.25. As discussed above, the site mainly comprises agricultural land and but includes areas and buildings formerly associated with The Moat, which lies outside of the Conservation Area.
- 6.26. The southern boundary of the Site is formed by Moat Road, with hedgerow including trees lining the boundary, but this is bookended by an electricity substation at the south-west corner (immediately beyond the Site) and the derelict buildings and hoardings at the south-eastern corner.
- 6.27. The expansion of the settlement of Headcorn has resulted in intervening modern development between the site and the Conservation Area (Plate 43).



*Plate 43 Site location in relation to Conservation Area*

- 6.28. It should be noted that the principle of development within the site has been established through the residential allocation of the site in the Local Plan, specifically the access from Moat Road, which is a stipulation of the site specific policy of the allocation, which requires:
- It is allocated for approximately 110 houses.
  - Built development shall be set back from Moat Road and the western boundary.
  - The existing hedgerow fronting Moat Road shall be retained and enhanced and the impacts of any access junction minimised and mitigated.
  - Vehicular access shall be via Moat Road, with junctions and sight lines designed to appropriate capacity and safety standards.
- 6.29. In addition, the residential development of the site would inevitably result in the offsite highway works comprising the construction of the footpath between the south-eastern corner of the site and Gooseneck Lane (not within the Conservation Area itself), and works to





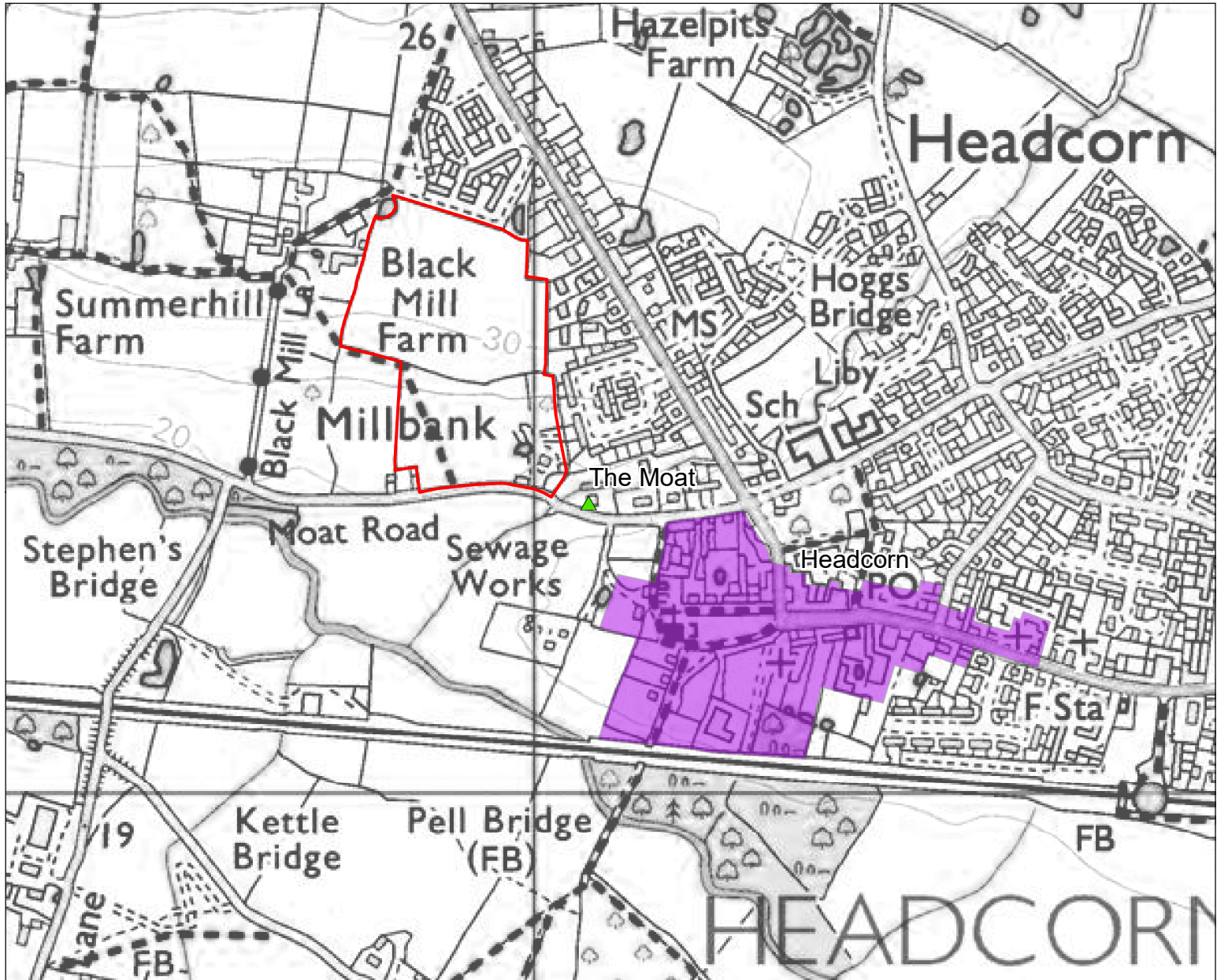
the junction of Moat Road and North Street (which already has traffic lights) including tactile paving and road studs for crossings.

#### *Conclusions on the Site*

- 6.30. Considering all of the above, the site is not considered to contribute to the heritage significance of the Conservation Area through setting beyond the hedgerow on the southern frontage, and its location between the substation and the derelict buildings means that the contribution is minimal.
- 6.31. With regards to Impact, whilst the proposed development will result in the construction of an access on Moat Road, removing a section of hedgerow, but the line of the hedgerow will be extended further to the east. Beyond the access, development has been sited to maintain an open frontage, with public open space mainly comprising informal grassland in the southern area. The footpath on Moat road will be established flanking the existing area of built form, and signage will be minimal.
- 6.32. Furthermore, the development will resolve the unsightly building on the Moat Road frontage, repairing, renewing and reconstructing the Granary, and removing the buildings of modern origin. This will be an enhancement to the approach to the Conservation Area (See photomontages 2A and 2B within the LVIA, core document CD 1.27, and also visualisations in the proof of Mr Mylchreest).
- 6.33. Overall, the proposed development will cause no harm to the heritage significance of the asset through setting.
- 6.34. Works on Moat Road comprising the footpath and signage beyond the Conservation Area are an inevitable result of the allocation, as are the works to the junction of Moat Road and North Street within the Conservation Area.



## Appendix 6: Figure



**KEY**

- Site
- ▲ The Moat (Grade II Listed)
- Headcorn Conservation Area

Revisions:  
First Issue- 29/01/2025 DS

**The Moated Listed Building,  
and Headcorn Conservation  
Area**

Land at Moat Road,  
Headcorn

Client: Catesby Estates Plc

DRWG No:P21-3568

REV: 1

Drawn by: DS

Approved by: -

Date: 29/01/2025

**Pegasus**

Scale: 1:7,500 @A4

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