

**APPENDIX iii: TABLE OF REPRESENTATIONS, AND THE COUNCIL’S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE REVIEW DOCUMENT IN RELATION TO THEM – FOR BORDEN PARISH CONSERVATION AREAS**

<b>Rep. No.</b>	<b>Representation By</b>	<b>Summary of Representation</b>	<b>Officer Response</b>	<b>Recommendation</b>
1	Local resident (personal data not included to comply with GDPR requirements)	<p>- A principal concern is the old post office stores, which is unlikely to be opened, but is presently an eyesore. All local history books reference this building along with other shops long closed.</p> <p>- The other building of concern (which also has its roots firmly planted in Borden history) is Home Farm and it’s various secondary addresses including the Homestead. This should be a photographic jewel, but is a sorry looking, rundown building now.</p> <p>- We are beholden to property developers and landlords, and whilst there have been many improvements in the area (notably the playstool area and associated playpark and nature reserve), there is also much to improve on.</p> <p>- The signage at the Playstool and Mount View entrance is damaged and in need of repair.</p>	<p>Noted. Officers are looking into the condition of both the building referred to and will issue Section 215 notices requiring the owners to improve their appearance if necessary. These buildings along with a number of others in Borden (The Street) Conservation Area are also proposed to be made the subject of an individual or collective conservation area-based Article 4 Direction to provide a more effective level of control of changes to their external appearance. Home Farm to also be put forward as a candidate for local listing if it meets the adopted selection criteria.</p> <p>The signage referred to was provided by the parish council, and the parish has been made aware of the damage to action appropriately.</p>	No change to review document needed.

**BORDEN PARISH CONSERVATION AREAS – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

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2	Local residents (personal data not included to comply with GDPR requirements)	<p>- Much of the information and the photographs in the pages 63 to 84 have been incorrectly placed. For example:</p> <p>page 74 RHS - the top photo is of Oldstede - not Tudor Rose Cottage/Dumbles [<b><i>to be clarified – report author’s note</i></b>]</p> <p>page 75 LHS - photos are not Oldstede but both photos are of Tudor Rose Cottage/Dumbles [<i>correct - report author’s note</i>]</p> <p>page 79 - the top photo is not Tudor Rose Cottage/Dumbles [<i>but Hook’s Hole – report author’s insertion</i>]</p> <p>page 82 - the top left photo is of Tudor Rose Cottage on Maidstone Road and not a local view along School lane. [<i>agreed and this view can be removed as it is almost identical to one of the views shown in 2a on page 81 – report author’s note</i>]</p> <p>It is hoped these mistakes can be corrected.</p> <p>- Support the proposed boundary extension to Chestnut Street Conservation Area.</p>	<p>Noted, with that confirmation being helpful. Officers will ensure that these corrections and any others that may be picked up from a necessary proof-reading exercise will be made and put in place for the version of the document that goes forward to adoption.</p> <p>Noted.</p>	<p>The referenced corrections to be made along with any other drafting errors and/or typos in the version of the document that goes forward to adoption.</p> <p>No change to review document needed.</p>

**BORDEN PARISH CONSERVATION AREAS – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
3	Local residents (personal data not included to comply with GDPR requirements)	<p><i>'The run of historic interest is then broken up by a series of late 20th century bungalows set far back on their plots with paved and concreted fronts. <u>The low brick walls which front onto the pavement are not in character with the more historic boundary treatments in the Conservation Area. The bungalows occupy the former site of the Vicarage and still feature the Gargoyles associated with this 19th century building (see photo left), although this quirk is somewhat spoiled by the insensitive siting of a CCTV camera right next to one.</u></i></p> <p>This document made most informative, even enjoyable, reading. The referenced (see underlining) 'insensitive' camera, and it's light, have now been removed</p> <p>You are of course correct about the 'low front walls' excepting the one for 'Norel'. This wall probably predates the Victorian Vicarage (which managed to be even uglier than the bungalows that replaced it) and is probably all that remains of the 'Georgian Rectory' on the site.</p> <p>The buildings much lorded in the document were built in a time before council building controls, and those less appealing in a time when such controls were in place</p>	<p>Noted. It is encouraging to hear that the document is appreciated by some local residents and in some cases having a positive influence.</p> <p>The type of lorded building referenced are typically listed and frequently represent the best, and fine examples of buildings of their age and type, commonly utilizing local sourced building materials and long-established building high-level craft skills (at relatively low cost by today's standards). These surviving fine historic buildings were typically (though not exclusively) built for wealthy individuals who wanted their homes to show off their wealth. Modern regulations have had an impact, but they do serve to ensure that those with no real wealth have access to housing which provides a good standard of residential amenity.</p>	No change to review document needed

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<b>Rep. No.</b>	<b>Representation By</b>	<b>Summary of Representation</b>	<b>Officer Response</b>	<b>Recommendation</b>
4	Borden Parish Council	<p>- Borden Parish Council (BPC) supports the proposed conservation area boundary extensions</p> <p>- BPC would also like Swale to consider extending the area further to include Coppins Lane</p> <p>- BPC would also like Swale to consider a new conservation area in the Wises Lane zone to conserve aspects of it character and appearance.</p>	<p>Noted, and the feedback regarding the proposed extensions is helpful.</p> <p>Coppins Lane was surveyed along with other areas just outside the current conservation areas. In general, this modern development of houses does not possess the sufficient level of architectural and/or historical interest to justify inclusion within a possible extension to the Harman's Corner Conservation Area. However, No. 2 Coppins Lane will be included as part of proposed extension HCA1 to include the characterful C19 Homestead Cottages directly adjoining it on The Street.</p> <p>There is no sound professional justification for a new conservation based around the Wises Lane zone.</p>	<p>No change to review document needed</p> <p>No change to review document needed</p> <p>No change to review document needed. No further survey work to be carried out in this respect.</p>

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<b>Rep. No.</b>	<b>Representation By</b>	<b>Summary of Representation</b>	<b>Officer Response</b>	<b>Recommendation</b>
5	Kent County Council Ecology Team	The document refers to bringing various habitats, such as stream and orchards back into positive management. There are no concerns with this, but just to highlight that with areas that have had limited/no management for some time, it is possible that re-implementing management (without mitigation) may result in a breach of wildlife legislation. So there is a need to ensure that prior to any management scheme commencing, the presence of protected species are considered. It is however considered that a balance can be found to provide a form of management which provides benefit from both a heritage and ecology perspective.	Noted. The Council would liaise with KCC's Ecology Team to ensure no breach of legislation would occur in carrying out any survey work, developing any specific management policy and carrying out any subsequent agreed maintenance/improvement works.	No change to review document needed.
6	Historic England	Appraisals are documents which inform understanding and significance of the area. Coupled with a management plan, they are a vehicle to reinforce the positive character of the area, as well as avoiding and minimising negative impacts to the area. Historic England is pleased that the Council is undertaking its statutory duty in reviewing this conservation area, and has no specific comments to make on either the contents of the review or the extensions to the conservation areas proposed. Attention is drawn to the relevant Historic England guidance document: Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1 (2 <sup>nd</sup> . Ed. Feb. 2019	Noted. The Council's external heritage consultant and officers have referred to the quoted Historic England Advice Note 1 in producing and reviewing the character appraisal and management plan, and it is referenced in Appendix 3 of the document which refers to relevant legislation, national and local policy and strategies.	No change to review document needed.

**BORDEN PARISH CONSERVATION AREAS – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)**

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
7	Montagu Evans, on behalf of Quinn Estates	<p>The representation is focussed entirely on the proposed extension to the Chestnut Street Conservation Area.</p> <p>Our conclusion is that the land within the area proposed for extension does not meet the statutory criteria for inclusion within the Conservation Area designation. The boundary of the Conservation Area should not be extended at all to include the area referred to as 'Florence Cottages' (para.1.5 from our submission)</p> <p>Firstly, we submit that there is no good reason set out in the draft Appraisal for the proposed extension to the Conservation area boundary to include the group of properties on the north side of Chestnut Street and the small parcel of land to the south. (1.8)</p> <p>Secondly, our review of the documents prepared by the Council in support of the proposed extension to the boundary presents us with none such evidence as to how the Council's assessment of these areas should result in the designation of the land proposed. (1.9)</p> <p>Further, our own assessment of these buildings and piece of land to the south of Chestnut Street leads us to the conclusions that the proposed area for extension does not substantiate a claim for 'special architectural or historic interest' as required for designation under Section 69 of the Act. Our assessment of this is presented at Section 3.0 of this report. (1.10)</p>	<p>The response narrowly identifies the heritage interest of the CAA as relating to the four listed Wealden Halls. However the original conservation area boundary was deliberately and purposely drawn to include areas of historic quarrying to the south and west and the 19<sup>th</sup> century streetscape to the north. That the Wealden Halls are exceptional is not in dispute but this should not be used as a reason to exclude other aspects of heritage interest.</p> <p>Regarding the extension of the conservation area to the northeast, this is a logical extension of the original 19<sup>th</sup> century historic footprint of the hamlet as far as the Tudor Rose Public House (a locally important building dating to before 1840. This proposed extension would also serve to include a pair of historic two storey</p>	No change to review document needed.

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<b>Rep. No.</b>	<b>Representation By</b>	<b>Summary of Representation</b>	<b>Officer Response</b>	<b>Recommendation</b>
7 (cont')	Montagu Evans, on behalf of Quinn Estates	Our conclusion is that the extension of Chestnut Street Conservation Area to incorporate land to the north and east of the existing boundary would lead to an inappropriate designation which is not based on any meaningful historic or architectural interest or connection, including land that has no consistent architectural quality and which has been subject to successive change and alteration. (1.12)	<p>cottages dating to 1888 and a two storey dwelling in render with a slate roof dating to c.1880. Local views along Chestnut Street, reveal buildings of historic interest as you travel through the Conservation Area [note if proposed boundary changes accepted – as far as Tudor Rose Public House]. The new inclusion would include the full 19<sup>th</sup> century streetscape within the Conservation Area rather than stopping arbitrarily at School Lane. See Map 11 to show links. It is accepted that all along the north side of Chestnut Street the 19<sup>th</sup> streetscape has been infilled by 20<sup>th</sup> century houses but this has not removed the historic and heritage interest present.</p> <p>Regarding the small parcel of land to the south. The heritage interest has been amply demonstrated and described. The complex</p>	(see page 6)

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7 (cont')	Montagu Evans, on behalf of Quinn Estates	(see pages 6 and 7)	<p>history of quarrying has been described in detail on pages 67 to 68 of the draft CAA supported by Map 11. These amply support the statement that the “Historic interest is further supplemented by the site of old mineral workings, which have now become attractively integrated into the adjoining countryside.” This includes both the area of open fields to the west which is an existing part of the Conservation Area and the new area proposed to the northeast which has the same historic interest and therefore heritage interest. It is also an area of archaeological potential and sensitivity as outlined on Page 72 and Map 13. These open spaces also contribute to the key positive characteristics of the Conservation Area</p>	(see page 6)



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7 (cont')	Montagu Evans, on behalf of Quinn Estates	<p>Furthermore, the proposal to extend the conservation area would serve to stifle the future use and effective management of the land, much of which is in agricultural use, by the landowners (1.13).</p> <p>Timing of the proposed extension - we find the timing of this proposed extension to the Conservation Area to be highly irregular and we request the Council make information on the evidence for this review available to the public (paragraph 1.18).</p> <p>The reported importance of this extension area was not raised at any time during the pre-application process for the Wises Lane planning application (ref. 17/505711/HYBRID) nor during the subsequent public inquiry.</p> <p>The review document does not present, as far as our assessment has shown us, any new information about the area around Chestnut Street than has previously been understood, or uncovered new information on the wider landscape that reveals important connections or historic associations. (3.2)</p>	<p>No evidence is presented to support this assertion. Officers consider agricultural activity could continue uninterrupted as it has within the area already designated to the east.</p> <p>The Borden Parish Conservation Areas review is a scheduled workstream/project element in the publicly available, adopted Swale Heritage Strategy 2020-32</p> <p>The Council's appointed heritage consultant for the public inquiry referenced the importance of this area in her evidence to the inquiry. Paragraph 6.4.7 of her proof of evidence refers.</p> <p>This is disputed by officers. Much additional information has been presented in sections 1.4, 3.2 and 3.3. This includes in relation to Chestnut Street on archaeological</p>	<p>No change to review document needed.</p> <p>No change to review document needed.</p> <p>No change to review document needed.</p> <p>No change to review document needed.</p>

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7 (cont')	Montagu Evans, on behalf of Quinn Estates	<p>Buildings within Area 1 The Appraisal does not set out a full description of significance for these buildings and their inclusion is unsubstantiated (3.25)</p> <p>The Council has not described on what basis the landscape around the CA possesses 'heritage' interest. This needs to be explained in the evidence base with clear grounds for genuine architectural or historic interest. (4.3)</p>	<p>potential, and historic quarrying.</p> <p>The description of significance is in line with guidance and includes further detail for the Tudor Rose public house which is locally important</p> <p>Officers presume that this comment refers to the proposed extension area to the conservation area. That being the case, this has already been explained as detailed above. Map 13 (page 69) and the Key Positive Characteristics information contained on page 72 of the review document provide the appropriate justification.</p>	<p>No change to review document needed.</p> <p>No change to review document needed.</p>

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8	Local resident (personal data not included to comply with GDPR requirements)	Just to add to the consultation is the addition of Chestnut House and Chestnut Cottage. These were one house and date back to the 16th century. Hard carve beams in the lofts indicate this and the houses form a Coaching Inn. The trap doors to the cellars are found in the front room of Chestnut House. The house became a coaching Inn in the 18th century. The "shoots" for the beer barrels are still in the foundation of the southwest wall. The wooden "bricks" to which panelling was attached are in the south and southwest walls. The stables were in the yard of Chestnut cottage. This information should be included in the conservation area information. The house originally was grade 3* listed in the 1970s however listing was lifted when the A249 was to be built through Chestnut Street ( prior to the original conservation area designation.	Noted, and the information provided is helpful. The buildings are already recognised as being of local important in the review document (see Map 14a on page 70: Key Characteristics – Historic Features and Views). The building are also referenced in the Key Positive Characteristics table on page 72.	<p>Historical Development map on page 65 to be corrected to reflect the age of the Chestnut House &amp; Cottage.</p> <p>General Statement on page 68 to be altered to reflect age of these buildings on the northwest side of Chestnut Street.</p> <p>Additional information provided to be added to the description of the buildings already provided on page 80.</p>