

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

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
1	Bapchild Parish Council	<p>- Support the aims and objectives of this consultation with a view to safeguarding this significant historic landscape and heritage assets.</p> <p>- Support the amendment to the boundary of the conservation area to include areas to the west and north.</p> <p>- Support the protection of the landscape around the Conservation Area and the enhancement of landmarks and views in the surrounding area. On this issue we would like to suggest that, in addition to ensuring the new Countryside Park to the west enhances the setting of the conservation area, this area is included within the conservation area. This would help improve public access to the area.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. However, the inclusion of the new (SBC managed) country park to the west of the spring within an extended CA boundary makes no practical difference to public access, and there are no sound conservation reasons to extend the boundary to include this wider area.</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>
2	Local landowner (personal not included to comply with GDPR requirements)	<p>- References to the Country Park in the document are inappropriate as this park has not existed for several years.</p>	<p>Use of the phrase country park is perhaps unhelpful but this does not mean that there are not clear designed features of the landscape to south of the pond, e.g. Memorial Oaks.</p>	<p>Remove references in review document to country park in relation to the land in question.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
2 (cont')	Local landowner (personal not included to comply with GDPR requirements)	<p>- The reference to the former carpark being in need of attention is therefore not relevant. We are intentionally allowing this area to grass over.</p> <p>- We have been liaising with the Kent County Council in regard to clearing the access for the public right of way from Church Road (which has been done), and also further clearing of the right of way (due to take place shortly).</p> <p>- With reference to the chain link fence, is it suggested that this be replaced at the council's expense and in conjunction and discussion with the present occupiers and owners of the property.</p> <p>- There is a bin for dog waste mounted next to the entrance to the former carpark. Since there has been no public access at this point for years, please could this bin be moved to the access for the public footpath, further along Church Road towards the Mill?</p>	<p>Noted, with that clarification being helpful.</p> <p>Noted, with that clarification being helpful. Check to be made on whether additional clearance work now completed.</p> <p>The chain link fence is located on private land so agreement would need to be reached between the Council and the landowner on the question of cost and what form any replacement boundary treatment takes.</p> <p>There is no specific reference to this in the review document.</p>	<p>The references to this in the review document (on pages 36 and 43) to be removed.</p> <p>No change to review document needed.</p> <p>Wording on page 44 of the document to refer to more appropriate replacement boundary treatment agreed in liaison with landowner.</p> <p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
2 (cont')	Local landowner (personal not included to comply with GDPR requirements)	Page 43 of the document states “Seek opportunities to secure future public access to the land – see separate note”. The separate note is not included. Please make this available as soon as possible by e-mail.	This was a crib note of the document author to herself, and was left in the consultation document in error	Remove reference to separate note in the review document.
3	Local residents (personal data not included to comply with GDPR requirements)	<p><u>Proposed Boundary Extensions</u> - Approve of the proposed boundary extension. In fact, we previously proposed a larger extension (see plan attached to full copy of this representation at Appendix v). The proposed boundary extensions may be too narrow to protect this conservation area.</p> <p><u>Trees</u> - The appraisal document fails to capture the full extent of trees which are important features within the conservation area.</p>	<p>The wider area of boundary extension proposed is not justifiable in terms of the special interest needed to justify it. However, the wider setting of conservation areas is required to be taken into account in relation to development proposals.</p> <p>The review document appropriately captures the 7 individual memorial trees which are a carefully designed landscape feature. That is not to say other trees within the CA are not important/unappreciated. The document shows how other trees contribute to the character of the area and important views.</p>	<p>No change to review document needed</p> <p>No change to review document needed</p> <p><i>Note: All trees within the CA – subject to some limitations on min. size and type - are protected by the CA legislation which requires notification to the LPA for works to them including felling.</i></p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
3 (con't)	Local residents (personal data not included to comply with GDPR requirements)	<p><u>Biodiversity</u> - Great to see references to this in the review document. List of flora and fauna provided which make their home in Tonge Conservation Area, including water voles, herons, hedgehogs, bats and at least 20 types of apple tree (see copy of this representation at Appendix v for full list provided).</p> <p><u>Dynamic Views</u> - The 6a view (page 23 of the review document) has a slight conflict now that the attenuation pond is being built at the Stone's farm development. One of the drains appears to be unnaturally raised and now really impedes that view. Photo provided to illustrate this (see copy of this representation at Appendix v for photo in question)</p> <p><u>Public Access</u> - With reference to the land on the southern side of the mill pond, the informal public access afforded should be formalised, as hundreds of people enjoy this space each week and the local community has been involved in litter</p>	<p>Noted, and the feedback in this respect is helpful.</p> <p>The image provided does look somewhat stark, but once the attenuation pond and associated approved landscaping is in place, the structure will be much less visible.</p> <p>The land in question (east of the Becket Spring) is privately owned and has not been managed as an informal country park</p>	<p>Additional bullet point to be added to the Key Positive Characteristics table on page 22: Informal semi-natural landscape which provides an appropriate setting to the historic mill buildings and in turn also sustains an important ecological resource.</p> <p>The image 6a in the document to have text added that this view will be altered with the construction of the Stones Farm housing development and creation of the associated country park. Related appendix to be added showing approved master plan for housing layout and country park landscaping</p> <p>Remove references in review document to country park in relation to the land in question. Show the route of the PROW which cuts across</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
3 (con't)	Local residents (personal data not included to comply with GDPR requirements)	<p>picks to keep it clean. One neighbour has repaired one of the benches offering (dynamic) view 7a. There are simply not enough parks in Sittingbourne and this is possibly the best example. Such green spaces are all the more important as recognised in a growing number of studies. Most of the referenced aspects of the conservation area (including specific views) would be lost if this space were lost. For the last few months all pedestrian access through the former car park has been blocked by a new fence. This is the safest entrance to the park and now it is gone. Several regular visitors have complained about this to us, at least one of whom is disabled, and is no longer able to access the park</p> <p><u>The Narrow Road</u> - On page 29 the report refers to the “narrowed bend into Church Road as it squeezes between the two buildings; the resulting pinch-point is an attractive and defining feature of the place”. Currently it is a national speed limit road, and people do seem to want to push that boundary. If the buildings are to remain in the long-term then a speed restriction is a necessity.</p> <p><u>Management Strategy</u> - This highlights the following issues, but does not propose solutions: i. Uncertain future of the area currently used for informal recreation ii. Pressure from commuter traffic and large vehicles using the Conservation Area as a cut through</p>	<p>since 2016 (see rep. 2, above). However, the public right of way (PROW) which cuts through this area is to be maintained, thereby still affording some public access. Also, the new country park being created to the west side of the spring (which will be managed by SBC) will afford a greater degree of amenity for recreational purposes.</p> <p>Officers are currently investigating if a Traffic Restriction Order (TRO) is appropriate in liaison with KCC as the Highway Authority and Bapchild and Tonge Parish Councils</p> <p>i. Unless the land area in question transfers to the Council or Tonge Parish Council, a permanent public country park area at the location in question will not be possible.</p>	<p>the land in question on the maps on pages 7, 23 & 24.</p> <p>No change to review document needed.</p> <p>i. No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
3 (con't)	Local residents (personal data not included to comply with GDPR requirements)	<p>iii. Development on the western side of the Conservation Area</p> <p>We propose the following solutions:</p> <p>i. Formalise a permanent park as per the note on protecting the park found on the Swale website: https://services.swale.gov.uk/meetings/mglIssueHistoryHome.aspx?IId=9151&Opt+0</p> <p>ii. Introduce a speed restriction</p> <p>iii. Lower the drain and ensure tree planting to maintain natural tree boundary to prevent the visual incursion of the Stone's Farm development.</p>	<p>However, the existing PROW's will be maintained and a replacement publicly accessible country park facility will be provided on the west side of the Becket Spring.</p> <p>ii. (see response above in relation to 'Narrow Road' comment – page 5).</p> <p>iii.(see response above in relation to 'Dynamic Views' comment – page 4).</p>	<p>ii. No change to review document needed.</p> <p>iii. (as per recommendation in relation to 'Dynamic Views' comment – page 4)</p>
4	Tonge Parish Council	Tonge Country Park ceased to be registered as a conservation area in 2016, however The Mill Stream; Tonge Pond and Thomas Becketts [sic] Spring all remain as conservation areas.	The area of the former 'country park' on private land remains within the Tonge CA boundary as existing and proposed. That is also the case with the mill stream (which is the Becket Spring) and the mill pond – referenced here at 'Tonge Pond'.	Remove references in review document to country park in relation to the privately owned land in question
5	Kent County Council Ecology Team	The document refers to bringing the stream 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	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	No change to review document needed.

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
5 (con't)	Kent County Council Ecology Team	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.	specific management policy and carrying out any subsequent agreed maintenance/improvement works.	(see page 6)
6	Montagu Evans, on behalf of Fenrose Ltd.	<p>Representation regarding area of land to the south of the Conservation Area. The land comprising the site forms part of the CA's immediate setting to the east of the spring</p> <p>Drawing these points of drafting together, the inference within the Appraisal appears to be that the Site forms an element of the setting which contributes to an appreciation of the CA's special interest by virtue of its more 'traditional appearance' and rural character. That contribution is made, it seems, by the existence of the panoramic view (View 5a) obtained across the field comprising the Site that encompasses Tonge Mill, the stream and the Thomas Becket spring in the southern part of the CA. The premise of the assessment in relation to land to the south and east of the Conservation Area appears to be that the agricultural use of the land, and the nature of views across it towards the CA, necessarily contributes to the significance of the asset and its appreciation. We do not agree with this proposition (from page 4 of rep.)</p> <p>First, while we agree that the Council is right to identify the glimpsed view from the footpath towards the top of the mill chimney as having value, we disagree with the conclusions as to the nature of the contribution that this</p>	The significance of this view is that you can appreciate the historical spatial relationship between the Spring, Stream and the Mill with the Mill Chimney forming an eye catcher in the view. This is not something which can be appreciated when standing within the Conservation to the north.	No change to review document needed.

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
6 (cont')	Montagu Evans, on behalf of Fenrose Ltd.	land makes to the special interest of the CA. The chimney provides a point of focus which contributes to one's sense of arrival and event, and communicates the presence of a feature of interest with an industrial character. Notwithstanding, we note that the view does no more than communicate the distant location of the mill; one has to enter the country park to understand the value of the listed building and its relationship with the water, the reason for the industrial use of this site. It is from within the CA that the historic and architectural qualities of the listed building are best appreciated (from page 4 of rep.)	(see page 7)	(see page 7)
7	Iceni Projects Ltd. on behalf of Trenport Ltd.	<p>TCA2 should not be included within an updated Tonge Conservation Area boundary.</p> <p>There is no identification of built form upon the land or an assessment of how it might contribute to the significance of the area. There is also no specific mention of the character and appearance of the land which is enclosed within the boundary of TCA2. This is not surprising as we consider the importance of this parcel of land and its contribution to the significance of the Conservation Area to be extremely limited, except for the small portion of the Castle ditch which is located at its southern edge (TCA1) which we do not raise objection to its boundary extension. Our concern for the designation of TCA2, in light of Paragraph 186 of the NPPF, is further reinforced as a result.</p> <p>On this basis, the boundary extension TCA2 is not justified and this CA boundary should not be extended.</p>	Officers dispute the location of the Windmill and maintain it is within parcel TCA 2 – see Map extracts at page 20 of this appendix in support. The reasons for the designation of this area therefore remain sound.	Add the windmill overlay map (see page 20 of this appendix) to the paragraph in the review document which discusses TCA2.

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
7 (cont')	Iceni Projects Ltd. on behalf of Trenport Ltd.	<p>“Area TCA2 Land to the north of Tonge Castle <i>The small triangle of land to the north of the Castle and south of the railway line follows the original access to the Castle and Mill and also includes the site of the former Windmill. This small (0.4 hectare) extension will ensure this important historical context is included within the Conservation Area.”</i></p> <p>The Appraisal notes that “There was also a windmill just north of the castle (shown on the 1820s map) which existed as late as 1834.” It does not, however, include a map dating to the 1820s to demonstrate this. However, by comparison of the 1787 map and the position of the existing windmill at this time, the draft Appraisal argues that the windmill was located within the boundary of TCA2. In fact, by carefully overlaying historic mapping, it would seem appropriate to suggest that the windmill fell to the north west of the boundary of TCA2 and the existing railway line has been constructed upon the site of the windmill.</p> <p>Additionally, whilst it is acknowledged that there is evidence of a historic road which aligned the south boundary of TCA2, the land within the TCA2 itself formed part of a larger field, with no evidence of access from the field to the Castle and Mill within it. Whilst the road has since been removed and realigned to the east (Church Road), reference to this road is partially retained by the public footpath to the south boundary although this, itself, appears to have been redirected to the south by comparison of Ordnance Survey mapping.</p> <p>The lack of evidence of any connection between the land area making up TCA2 and the castle and mill is further</p>	(see page 8)	(see page 8)

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
7 (cont')	Iceni Projects Ltd. on behalf of Trenport Ltd.	<p>emphasised as TCA2 is identified within the draft Area Appraisal to be 'landscape development' dating to the seventeenth and eighteenth century. This is illustrated through historic mapping presented within the draft Area Appraisal and confirms that no structures are known to have been constructed upon the parcel of land.</p> <p>As a result, having assessed historic map regression and concluded there is no evidence to suggest that any built structures have stood upon the land captured within TCA2 historically and confirmed there are no built structures or evidence of significant visible remains upon the land today, we consider the proposed designation of this land would be contrary to the purpose of the legislation and guidance discussed above. (Page 4)</p>	(see page 8)	(see page 8)
8	Historic England	<p>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 (2nd. Ed. Feb. 2019</p>	<p>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.</p>	<p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9	Montagu Evans, on behalf of Quinn Estates	<p>(From para. 1.6 of rep.): We have considered the draft Tonge Conservation Area Appraisal Review (2020), inspected the site and reviewed relevant guidance. Our conclusion is that the Council makes unsubstantiated claims about the significance of the land within the Conservation Area, and the land which comprises its setting, and needs to revisit the assertions made in the Appraisal.</p> <p>(From para. 3.25 of rep.): Firstly, the definition of this area as a Country Park is misleading and is a reflection only of the former use of the area as a recreational amenity area. This area has not been landscaped or planned in a way that would suggest it is of historic or architectural significance as a ‘country park’.</p> <p>(3.33): The Appraisal sets out a summary of the main facets of significance which lend the area its special character and we comment with our own assessment under each.</p> <p><i>Surviving earthworks of Tonge Castle, and fortified manor – the earthwork and its environs have high potential for Medieval and Post Medieval archaeology.</i></p> <p>The area is evidently hugely degraded and should not be ascribed significance. We urge the Council to review our own assessment of the earthwork. This element of the statement of significance should be revised to reflect this.</p>	<p>Comments are provided to each key point made by Montague Evans (ME) as set out below in the table.</p> <p>The use of the phrase country park is perhaps unhelpful but this does not mean that there are not clear designed features of the landscape to the south of the Mill Pond for example the Memorial Oaks</p> <p>This is disputed. Although degraded, this earthwork is one of only a handful of sites of this type in Kent. This assessment in significance was reached following discussion with KCC’s Heritage Conservation Team</p>	<p>(please refer to the recommendation set out adjacent each key point, as set out below)</p> <p>Remove references in review document to country park in relation to the land in question.</p> <p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p><i>Archaeological potential for prehistoric and Roman activity in the landscape and perhaps focused on the spring.</i></p> <p>This is an assertion. The Council needs to explain what it meant by 'perhaps.' Extensive archaeological evaluation work would be needed to corroborate this claim.</p> <p><i>The spring and stream have paleo-environmental potential.</i></p> <p>Again, this may be correct but the Appraisal needs to identify specifically where this potential lies and explain what the implications of that are. Archaeological interest is not a reason for CA designation.</p> <p>Note: archaeological interest is relevant to CA designation.</p>	<p>All assessments of archaeological potential based on the Historic Environment Record are by their nature assessments of probability. This assessment was reached following consultation with the County archaeologist</p> <p>Historic England guidance on Conservation Area Appraisal, Designation and Management states that "<u>Heritage assets with archaeological interest can contribute, directly and indirectly, to the character of conservation areas.</u> These areas will often have further archaeological interest and it may even be possible to define areas with potential for remains of high importance. This archaeological evidence may relate to specific activity that is locally distinct, rare or of particular archaeological interest. There is likely to</p>	<p>No change to review document needed.</p> <p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p align="center"><i>Association with legend of Vortigern, Hengist and Horsa.</i></p> <p>The appraisal confirms on page 13 that the story of Hengist and Vortigern has no archaeological evidence to support it. The Appraisal goes onto say that <i>'It is however likely that there was some form of fortified settlement at Tonge from the 7th century onward. Due to its strategic position on coastal lands and the ready supply of water from the springs at Bapchild.'</i></p> <p>This is simple assertion and should be substantiated with evidence. Significance to the area should not be attributed on this basis.</p> <p align="center"><i>Association between the spring, the cult of Thomas Becket and grounds of former leper hospital.</i></p> <p>The Appraisal has limited information on the provenance and interest of the location of a hospice in this area. It is stated on page 17 that <i>'A Mediaeval leper hospital was</i></p>	<p>be a relationship between subsurface remains, monuments and upstanding remains (including buildings and property boundaries) and spaces which contribute to the significance of each by providing evidence of their historic development and use. (paragraph 92)" <u>[Your officers emphasis]</u></p> <p>This is not an assertion, but a statement of potential supported by the detailed Bannister 1995 survey.</p> <p>The location of the former leper hospital is taken from the Kent Historic Environment Record (HER). The stream/spring has significance</p>	<p>(see page 12)</p> <p>No change to review document needed.</p> <p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p><i>developed alongside the stream, and it is possible that the stream become a popular stopping point for pilgrims on their way to Canterbury.</i> [our emphasis]. This is conjecture. The association with the pilgrimage activity needs to be substantiated before significance is attributed to this.</p> <p>The map on page 9 is in error. The label showing the location of the hospital is not correct and needs to be accurate.</p> <p><i>* Area of informal recreation and varied natural habitat to the south of the millpond</i></p> <p>This is a more accurate description of the area labelled as the Country Park and that label should therefore be removed.</p>	<p>notwithstanding whether it was a stopping off point for pilgrims. However given the focus of pilgrimages to Canterbury Cathedral (i.e. the sainted Thomas Becket), given that the spring was named after Becket it is not unreasonable to assume that it would have attracted the attention of pilgrims.</p> <p>The reference to 'Country Park' is a legacy from the data used to provide the last digitised edition of the Ordnance Survey (OS) mapping. This can be corrected at the next OS data refresh. In view of comments received from the landowner (see rep 2), reference to an area of 'informal recreation' would be inappropriate.</p>	<p>(see page 13)</p> <p>The notation of 'Tonge Country Park' to be removed from the mapping shown in the review document. * Bullet point from summary of significance and special interest table on page 6 to be changed to: <i>Area of varied natural habitat to the south of the millpond.</i></p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p>The Appraisal identifies a series of views in the document. It is not clear on what basis these have been identified and what it is the Council considers they add to an understanding of the special interest of the area. We provide comments on the views as relevant.</p> <p>View 1a: <i>Local view from outside of Conservation Area at Scraps Hill towards the mill.</i></p> <p>View 1b: <i>View eastward across area of historic grazing up to Scraps Hill from adjacent to the Old Mill. The railway embankment is screened by the trees on the left hand side of the picture.</i></p> <p>View 1c: <i>View from just north of the junction of Scraps Hill and Church Road looking northwest</i></p> <p>(3.35): We do not see what these add to the understanding of the character and appearance of the CA.</p> <p>(3.36): The contribution made by the surrounding fields as seen from the core of the interest of the CA, and views to the surrounding landscape, are limited by the rise of the landform to the north east and the vegetated boundary of the railway embankment which forms the CA's northern boundary.</p> <p>(3.37): To the south and east, the visitor has no sense of the qualities which give this area its special architectural and historic interest warranting its designation; views from The Street and Hempstead Lane are prevented by modern housing and dense hedgerows respectively.</p>	Views 1a and 1c clearly allow an appreciation of the relationship between the mill buildings. View 1b is a view out to the undeveloped historic field to the east.	Add further explanatory text to the photo descriptions.

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p>From the west, while views towards the CA are obtained from the public footpath towards the stream and spring, there is no visual indication that the watercourse is of any historic interest or has value beyond its quality as a natural feature.</p> <p>View 3a – <i>Southwards from edge of meadow towards Spring Head and Watling Street</i> 3.38 This is not an accurate description of this view and is not of particular amenity or heritage value. It is in fact quite an enclosed view across the heath, bounded by the low hedge tree line. Suburban housing can be seen to the left and a hedge to the right.</p> <p>View 5a – <i>180 degree view northwards towards chimney from outside of the Conservation Area where public right of way exits the settlements on the north side of Watling Street. From here you can appreciate the relationship of the spring, stream, and mill.</i></p> <p>(3.39): It is not possible to see the significant relationship between the historic mill buildings and the waterways and should be reworded to reflect this.</p>	<p>Officers disagree with this. If viewed using the historical context provided by this assessment and Bannister 1995 report, the watercourse does possess historic interest.</p> <p>Further descriptive text is needed to describe heritage interest in each view as to why they have been chosen. However, officers maintain that these identified views do add to an understanding of the area.</p>	<p>As part of the development of the new countryside gap park, one or more interpretation panels to be provided adjacent new footpaths to help assist in an understanding and appreciation of the historic landscape. 'Other Actions' point to be added to the end of the management strategy table on page 44, to that end.</p> <p>Add further explanatory text to the photo descriptions.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
9 (con't)	Montagu Evans, on behalf of Quinn Estates	<p>View 6a – 180 degree westwards over stream out of Conservation Area [towards future countryside gap].</p> <p>View 6b – View from Public Right of way to the west of the Conservation Area looking east across stream and up the eastern side of the valley.</p> <p>3.40 We do not see that these views adds to an understanding of the historic significance of the Conservation Area. These views are long distance views with no particular features which make a material contribution. The scraped farmland detracts from the amenity quality of the view in view 6b.</p> <p>(3.53): The present configuration of the land to the south of the mill pond - known as the country park - dates from following the Second World War, when the orchard landscape started to be cleared to the south of the mill pond. Thus, the boundary of the CA, while it undoubtedly encompasses features of historic and architectural interest, also includes areas of landscape - the 'country park' - whose form and character is of recent derivation.</p> <p>(3.54): The inclusion of these areas, it is assumed, relates to their recreational rather than historic value.</p>	<p>Further descriptive text is needed to describe heritage interest in each view as to why they have been chosen. However, officers maintain that these identified views do add to an understanding of the area.</p> <p>Whilst the commentary set out in para. 3.53 is essentially correct, the assertion derived from that at para. 3.53 is based on a false assumption. However, this feedback does highlight the need for some clarification.</p>	<p>Add further explanatory text to the photo descriptions.</p> <p>Add sentence describing the historic value to the spatial analysis of the area in question – to aid clarity.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
10	Local residents (personal data not included to comply with GDPR requirements)	<p>- Pleasure to read in the review document how much heritage and history surround the Tonge Mill Pond area. The document is insightful to the depth of history that surrounds the area.</p> <p>- It's a positive move to extend the conservation area, but if anything the extension needs to cover a wider area.</p> <p>- Conserving and preserving our history is a important as positively managing the area, and in a way that would not allow special features to be lost.</p>	<p>Noted and it is positive to hear that the document is of interest and value to local residents.</p> <p>The conservation area boundaries have been carefully considered as part of the review work and officers consider that any extension above and beyond those already proposed could not be justified. However, local planning authorities are required to take the setting of conservation areas into account when considering any development proposals.</p> <p>Noted and agreed. One of the objectives of producing the character appraisal and management strategy document is to help ensure that the history of this special area is preserved and valued by a wider range of stakeholders, notably local residents.</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>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No.	Representation By	Summary of Representation	Officer Response	Recommendation
10 (con't)	Local residents (personal data not included to comply with GDPR requirements)	<p>- Need to be mindful of development encroaching into this part of Tonge and policies to effect a type of greenbelt in the locality may not be effective, such the in the future, the conservation area may be surrounded by industrial development and an adjacent new relief road.</p> <p>- This conservation area is important not only because of the historical interest it provides, but also because of the ecological value and recreational facility it provides. It is therefore an extra valuable community resource.</p>	<p>Policies in the Local Plan and the Tonge Conservation Area Character Appraisal & Management Strategy are intended to function in parallel to ensure that any development taking place in or adjacent the conservation would not erode its special qualities. Conservation areas were created not to block development but to help ensure any development that takes place in or around them is sensitive to context and of a suitably associated high standard of design. Furthermore, national guidance is clear that some forms of development can positively enhance conservation area e.g. by better revealing its special interest.</p> <p>Noted, and it is considered that the review document captures these additional benefits which the conservation area offers.</p>	<p>No change to review document needed.</p> <p>No change to review document needed.</p>

TONGE CONSERVATION AREA – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Images showing the location of the historic windmill at Tonge (see rep. 7 on page 8 in the table)



Up-to-date aerial photograph
and 1787 map



Up-to-date aerial photograph
overlain by 1787 map.