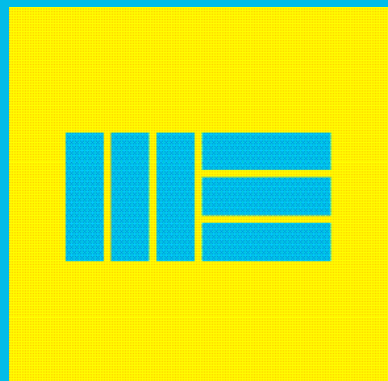


REPRESENTATIONS ON THE TONGE CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN, CONSULTATION DRAFT

LAND NORTH OF THE STREET, BAPCHILD

NOVEMBER 2020



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EXECUTIVE SUMMARY AND FINDINGS

Montagu Evans is instructed by JB Planning on behalf of Fenrose Ltd ('the Client'), to respond to the draft Conservation Area Appraisal and Management Plan prepared for Swale Borough Council in relation to the Tonge Conservation Area, Bapchild.

The Client is the owner of land located to north of The Street, Bapchild (the 'Site'), located outside the Tonge CA boundary to the south-east (Figure 1.1).

The drafting of the CA Appraisal concerns our Client's land in the consideration of the special interest of the CA and the contribution made to that special interest by its setting. Montagu Evans has been instructed to review the draft Appraisal and Management Plan as it relates to the Site and to prepare these representations.

THE HISTORY AND SPECIAL INTEREST OF THE CA

The Tonge CA is unusual in its form and character. It comprises a collection of related built heritage assets, remnant earthworks and natural landscape features set within a small recreational country park whose form, particularly to the east, follows land boundaries largely established in the later 20th century.

The area has a long history of settlement related to the presence of a water source – the 'Thomas Becket' spring – and associated stream which runs through the area along its western boundary and feeds a mill pond to the north. The built heritage now present in the area is focussed at its northern edge and comprises the earthworks of Tonge Castle as well as 19th century examples of Kentish vernacular industrial architecture. Most prominent, and with a landmark quality, is the Grade II listed Tonge Mill, a 19th century steam mill on the site of an earlier water mill.

To the south, the CA boundary extends to include the line of the stream and the spring. The spring is likely to have been the water source for the hospital of St. James, 'Pokeleshal,' in the parish of Tonge, the supposed site of which, to the south of the spring head, may be under the modern housing now fronting the A2. While a natural feature, this has been an important water source since at least the late 11th century and is of local interest.

The historic evolution of the CA's landscape and its landscape setting has undergone significant change, both in terms of its boundaries and its use. The historic map regression suggests the land to the north-east of Bapchild to have been characterised in the 18th century by enclosed open-strip fields, which had been removed by the time of the 1872 OS. The 19th and early 20th centuries saw the rapid expansion of orchards on a commercial scale, which extended to meet the banks of the both the mill pond and the stream.

The present configuration of the land to the south of the mill pond – known as the country park – dates from post-WWII, when the orchard landscape began to be cleared to the south of the mill pond and along the eastern bank of the stream. 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.

The inclusion of these areas, it is assumed, relates to their recreational rather than historic value.

CHARACTER AND SETTING

The character of the CA today is strongly informed by the qualities of enclosure and definition which derive from the flat, low-lying landform of this area and the extensive vegetation to its boundaries. The focus of the CA is the cluster of historic buildings and structures to the north-east. The character of the country park that contains them to the south is such that woodland belts and boundary hedging largely prevent intervisibility with the surrounding landscape.

The built elements and their interrelationships are best appreciated from within the country park where they can be seen in association with the mill pond, which comprises their immediate setting and is the reason for their presence here. The grouping of the buildings can also be appreciated from Church Road.

From this core of the CA, views to the surrounding landscape are limited by the rise of the landform to the north-east and the vegetation lining the railway embankment which forms the CA's northern boundary.

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 towards the CA from The Street and Hempstead Lane are prevented by modern housing and dense hedgerows respectively. From the west, while views 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.

THE CHARACTER AND CONDITION OF THE SITE

The land comprising the Site forms part of the CA's immediate setting to the east of the spring. It comprises a field in agricultural use, subject to urbanising influences; the major thoroughfare of the A2 (the London road) lies to the south, and substantial 20th century houses set within domestic curtilages bound the field on its southern and eastern sides. The field is accordingly experienced as part of a developed settlement edge and is associated with it through the presence of modern vehicular access, a former car park in its northwest corner and associated features (utilitarian gates and fencing). This element is identified as a detracting feature in the setting of the CA; we agree with that assessment.

A public right-of-way, established in the 19th century and replacing an earlier path that followed the western edge of the field more closely, extends across the field north-south. The path is enclosed by fencing and affords a directional view of the chimney of Tonge Mill.

The western and northern boundaries of the Site comprise densely vegetated hedgerows, dating from the later 19th century when the modern field boundaries were set out.

THE TREATMENT OF THE SITE WITHIN THE CA APPRAISAL

The draft Conservation Area Appraisal refers to the Site or land in the vicinity of the Site as part of the consideration of the landscape setting to the east and south of the CA:

- At page 35, the appraisal states that to the eastern side of the valley (both within, and beyond, the CA), the landscape 'remains more varied with, for example, a mix of hedgerows, trees, and orchards still being present; this side consequently retains a more traditional appearance. There is a commercial orchard and field with rough grazing (the Site) to the south and east of the Conservation Area Boundary';
- At page 36, part of the Site (formerly used as a carpark) is referenced as a *Key Negative Characteristic*, 'in need of attention';
- At page 40, *New Development Opportunities*, the appraisal states that development within the settings [sic] of the Conservation Area should conserve the historic grain of the mill and avoid the infilling of the remaining rural countryside setting to the east and south of the Conservation Area;
- At page 41, *Conservation Area Objectives and Priorities for Management and Action*, the Council states that it will seek to ensure the protection of the landscape around the Conservation Area and the important role this plays in providing it with an attractive and contextually appropriate rural setting, which focuses on the heritage interest which informs the significance of the Conservation Area;
- *The Appraisal includes a map identifying Key Characteristics: Historic Features and Views. The Site forms an element in two: View 5a and View 6b, identified as a 'panorama featuring a focal point or points' and a 'dynamic panorama' respectively.*

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, as explained below.

THE CONTRIBUTION OF THE SITE TO AN APPRECIATION OF SPECIAL INTEREST AND CONSEQUENT FINDINGS ON THE CAA DRAFTING

Our comprehensive assessment has concluded that the Site has no distinguishing characteristic that links it to the historic and architectural interest of the CA. While the CA does have a historic association with land outside its boundary, that connection is to the north, with the medieval church at Tonge. In respect of the land to the south, our research has found nothing to suggest any peculiar or special functional relationship.

The footpath across the field, we would suggest, relates to a general point of amenity. It is a 19th century diversion of an older path.

Likewise we have not found that the present agricultural use of the Site – a piece of productive land now drawn within the orbit of urbanising influences – has any intrinsic quality beyond the view that is obtained over it to the mill chimney, which signals a feature of the CA.

Indeed there is no obvious visual connection between the Site and the elements that convey the special interest of the CA. The dense hedgerow that denotes the western boundary of the site prevents any intervisibility with the spring; while it may suggest to the observant viewer the presence of a water course beyond it, there is nothing to convey the particular associative qualities of this feature. Accordingly, unless one is aware of the claimed historic background, there is nothing to suggest special interest.

The northern boundary of the Site is separated from the CA by an interposing piece of land outwith the CA, occupied by a commercial orchard. The hedgerow to the northwest corner of the site is degraded and comprises a poor quality edge to the CA. We agree with the observation of the Appraisal that this part of the site is a negative feature.

On this basis, and turning to View 5a within the draft Appraisal, we have the following observations.

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 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.

We note, moreover, that this is an incidental view, and that the mill chimney is visible to a greater extent from numerous points within and outside the CA, including long approach views along Lower Road (Scraps Hill).

Second, we do not consider View 5a to have the qualities generally associated with a panorama. We consider the application of the word in this case to have its normal English meaning, that of a sweeping or broad prospect and generally from an elevated position. We note that in this instance, the view is framed to each side by inter-war and ribbon development and is directional in its nature through the fencing and vegetation enclosing the footpath.

Taken together with the inability to discern the stream and spring from this location, we would suggest that the current drafting that accompanies the viewpoint in the draft Appraisal does not reflect its character or qualities.

Third, the agricultural use that characterises the land to either side of the footpath in the view makes no material contribution to its quality or character. Indeed, it does not contribute anything beyond not blocking it, and as noted, is experienced in the context of peripheral residential development. An opportunity therefore exists to enhance the landscape quality of this land whilst focussing attention on the focal point, the mill chimney.

We note that the 19th century was a period of intensification of land use and urban growth; there would be nothing incongruous with seeing the form of the chimney from a planned urban landscape.

In relation to View 6b we note that the view has no obvious historic character: the CA appears as a pleasant piece of recreational land framed by and understood in the context of the settlement edge. The A2 is an urbanising influence, the presence of which is understood through road noise and the houses fronting it. The stream and spring head, which may be perceptible to the observant viewer, display no feature to convey their claimed associative value.

Accordingly, and for the reasons set out above, whilst we agree with the characterisation of the Site as 'rough grazing' and do not dispute that it has an agricultural use, we are very clear that we do not consider this element of the CA's setting to retain its rural character or traditional appearance. The urbanising influences are marked in this instance, and accordingly we submit that the drafting under *New Development Opportunities* at page 40 of the draft Appraisal does not relate to the Site.

This should be reflected in the analysis of this part of the CA's setting within the Appraisal, and taken into account in the drafting of the management guidance presented from page 40 onwards. We respectfully suggest the following amendments to the wording of the Overarching Objectives at page 41 below:

2. *The preservation or enhancement of the setting of the conservation area **where it contributes to an appreciation of special interest**, and other designated heritage assets*

4. *Protection ~~or~~ **and** enhancement of landmarks, views and vistas within and without the conservation area **where these contribute to special interest or an appreciation of special interest**.*

5. *Protection of the landscape around the Conservation Area **where it plays an important role in** ~~and the important role this plays in providing it with an attractive and contextually appropriate rural setting, which focuses on the heritage interest which informs the significance of the Conservation Area.~~*

FURTHER COMMENTS ON THE CA APPRAISAL

Map 5: Historic Development labels the country park as 17th and 18th century. This is factually incorrect; the historic map regression contained within the Appraisal evidences considerable changes in land use and boundaries between the late 18th and 20th centuries. The present configuration of the land as a country park post-dates WWII (albeit with some remnant orchard trees) and this should be made clear.

We consider the drafting at page 40: 'Development within the settings of the Conservation Area should conserve the historic grain of the mill and avoid the infilling of the remaining rural countryside to the east and south of the Conservation Area' to be unclear. The Council should clarify its meaning.

A number of the figures included within the draft appraisal use the Ordnance Survey mapping as the base plan, which places the annotation for *St Thomas a Becket's Spring* on the field comprising the Site. We would suggest that it is made clear that the annotation in fact relates to the spring head within the CA boundary.

SUMMARY

In summary, therefore, we have significant reservations in respect of the approach taken to the identification of special interest and the contribution made to that interest by setting.

Whilst we do not say that the view across the Site towards the mill chimney is unimportant, we do however disagree with the importance that is attributed to this in the context of the character of the land. We consider that there has been a conflation as between a view which we acknowledge is of interest, and the agricultural use of the land. We are very clear that we do not think that the setting in question retains its rural character.

We respectfully request that our analysis and conclusions as presented in this report are reflected in the drafting of the adopted appraisal.

1.0 INTRODUCTION

LAND NORTH OF THE STREET, BAPCHILD

INTRODUCTION

- 1.1 Montagu Evans is instructed by JB Planning on behalf of Fenrose Ltd ('the Client'), to respond to the draft Conservation Area Appraisal and Management Plan prepared for Swale Borough Council in relation to the Tonge Conservation Area, Bapchild.
- 1.2 Swale Borough Council is in the process of a borough-wide review of its conservation areas in accordance with its recently adopted Heritage Strategy (March 2020). As part of its review, the Borough Council has instructed the preparation of updated character appraisal and management plan documents for the parishes of Borden and Tonge.
- 1.3 The draft appraisal for the Tonge Conservation Area ('the CA') is currently submitted for public consultation. The draft appraisal is dated October 2020; the consultation period expires on the 15 November 2020.
- 1.4 The Client is the owner of land located to north of The Street, Bapchild (the 'Site'), located outside the Tonge CA boundary to the south-east (**Figure 1.1**). The Site's western boundary lies adjacent to the CA; the northern boundary is separated from the CA by a field currently in use as a managed orchard. To the south and east the Site is bordered by interwar housing fronting The Street and Hempstead Lane.



Figure 1.1 Aerial view showing the Tonge CA (shown in green) and its relationship to the Site under consideration, comprising land to the north of The Street, Bapchild (shown in red).

PURPOSE OF THE REPORT

- 1.5 Montagu Evans has been instructed to review the draft Appraisal and Management Plan as it relates to the Site and to provide these representations now submitted.
- 1.6 To discharge this instruction, we have undertaken:
- A comprehensive review of material relating to the Conservation Area, including the extant and draft CA Appraisals;
 - Research into the historic development of the CA and its constituent landscape elements;
 - An extensive site view¹ to understand the extent, character and appearance of the Conservation Area and the way it relates to its immediate and wider setting.
- 1.7 Our analysis draws on the expertise of Dr Paul Stamper, an acknowledged landscape expert and who has assisted in the preparation of this report. Dr Stamper's CV is reproduced at **Appendix 1.0**.
- 1.8 Our assessment presented in this report is accordingly based upon a thorough understanding of the area and best practice in historic area and setting assessment as set out in the relevant Historic England guidance, Conservation Area Designation, Appraisal and Management (February 2019), Understanding Place: Historic Area Assessments: Principles and Practice (2017 edition) and The Setting of Heritage Assets (2017 edition).

REPORT STRUCTURE

- 1.9 The report is structured as follows:
- **Section 2.0** summarises the statutory and policy framework relevant to the designation and review of conservation areas, their management and considerations of setting;
 - **Section 3.0** presents our research into the historic development of the CA and its landscape, and the significance of its constituent elements;
 - **Section 4.0** provides a comprehensive assessment of setting considerations pertaining to the CA, its character and appearance;
 - **Section 5.0** assesses the contribution made by the Site to an appreciation of that special interest, with reference to the CA Appraisal drafting; and
 - Our findings and conclusions are presented within the Executive Summary, to which we refer the reader.

¹ Undertaken 5th November, 2020

2.0

POLICY AND BEST PRACTICE GUIDANCE

LAND NORTH OF THE STREET, BAPCHILD

POLICY AND BEST PRACTICE GUIDANCE

2.1 This section sets out the statutory and planning policy context that provides the framework for Swale's conservation area review and the draft appraisal currently out for consultation in relation to the Tonge Conservation Area.

STATUTORY DUTY

2.2 As defined in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, a conservation area is an area designated because of its 'special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.' S69(2) requires that Local Authorities review their conservation areas 'from time to time' to establish whether they still retain the special character and appearance that warrants their designation or whether further parts warrant designation.

2.3 Section 71 (1 and 2) of the 1990 Act requires local authorities to formulate and publish proposals for the preservation and enhancement of conservation areas and consult the public in the area in question, taking account of the views expressed.

2.4 Swale is currently undertaking this review in respect of its conservation areas, in line with its recently adopted Borough-Wide Heritage Strategy (2020–2032) adopted in March 2020.

MATERIAL CONSIDERATIONS AND BEST PRACTICE GUIDANCE

2.5 Best practice guidance on conservation area appraisal, designation and management has been prepared by Historic England in its Advice Note 1: Conservation Area Appraisal, Designation and Management (Second Edition, 2019) ('HEAN1').

2.6 The advice contained within the document emphasises that the evidence required to inform decisions affecting a conservation area, including both its designation and management, should be proportionate to the importance of the asset. HEAN1 follows the government's recommended approach to conserving and enhancing heritage assets, as set out in the National Planning Policy Framework (NPPF) within Chapter 16, *The Historic Environment*.

2.7 At paragraph 4, HEAN1 states:
Change is inevitable, and often beneficial, and this advice sets out ways to manage change in a way that conserves and enhances the character and appearance of historic areas.

ASSESSMENT OF SETTING IN RELATION TO CONSERVATION AREAS AND THEIR APPRAISALS

2.8 In relation to the preparation of conservation area appraisals, HEAN1 provides a checklist of key elements in defining special interest². That includes the contribution to the special interest of a conservation area made by its setting: '*what the setting can contribute to the significance of a heritage asset, and how it can allow that significance to be appreciated*'.

2.9 The guidance refers the reader to Historic England's *Good Practice Advice Note 3: The Setting of Heritage Assets ('GPA3')*, which sets out the established approach to the consideration of and assessment of setting. We have had due regard to the GPA3 guidance in the preparation of this report.

2.10 The setting of a heritage asset is defined within the NPPF 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" (NPPF, Annex 2: Glossary)

2.11 Best practice guidance (the Planning Practice Guidance and Historic England's GPA3) confirms that changes to setting might include visual impact, or a change in our ability to appreciate the special interest of a heritage asset. GPA3 is clear that visual perception matters a great deal. Historical and functional associations may be important on the facts of any case.

2.12 It is clear from policy and guidance, however, and confirmed by the Courts in recent judgments, that impact on setting itself is not the consideration. Setting is important only to the extent it enables an appreciation of significance or contributes directly to it. Thus a change to setting, even a major one, can be neutral, beneficial or harmful depending on the particular facts of any case.

2.13 Although the settings of conservation areas are not protected through statute, the NPPF states that the setting of a designated heritage asset (including conservation areas) can contribute to an appreciation of its significance, and the setting protection extended to conservation areas in policy terms is equivalent to that for listed buildings.

2.14 To assist in the exercise of the functions of the Framework, and with regard to the preparation of appraisals, HEAN1³ states that an appraisal should identify how the landscape or townscape that the area is within contributes to its special interest. It notes that that contribution might take the form of approaches along historic routes or visual connections between different areas that illustrate an important historic relationship.

2.15 We note that Historic England particularly commends the approach of Craven District Council towards conservation area appraisal and management⁴. It notes that the authority's provision of a focussed assessment of the development potential of open spaces within or outside of each conservation area – including impact on the settings of conservation areas and views – enables development management staff to rapidly access an understanding of the contribution of spaces to each conservation area. Thus, the Local Plan is reinforced by the provision of a comprehensive assessment of the sensitivity of land for housing allocations in or near these conservation areas.

² HEAN1, paragraph 34

³ HEAN1, *Setting and Views*, paragraph 58

⁴ HEAN1, paragraph 31

IDENTIFYING AND REVIEWING CA BOUNDARIES

- 2.16 HEAN1 also contains guidance on identifying and reviewing conservation area boundaries⁵.
- 2.17 The guidance states that before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls that result from designation. We note that conservation area designation is not generally an appropriate means of protecting the wider landscape, but it can protect open areas particularly where the character and appearance concerns historic fabric.
- 2.18 The consultation draft appraisal for the Tonge CA has considered the conservation area boundary and proposed two additional areas for inclusion within the designation. Accordingly, we infer, the immediate setting of the CA, including the Site and surrounding land, has been carefully considered and is not deemed of sufficient architectural or historic interest for inclusion within the CA boundary. We agree with that assessment, as explained within the following analysis.

⁵ HEAN1, paragraph 68, paragraph 75, Section 7.

3.0

HISTORIC DEVELOPMENT AND APPRAISAL OF SIGNIFICANCE

LAND NORTH OF THE STREET, BAPCHILD

HISTORIC DEVELOPMENT AND APPRAISAL OF SIGNIFICANCE

THE HISTORIC EVOLUTION OF THE LANDSCAPE

- 3.1 In 1798 Edward Hasted, the historian of Kent, characterised the parish of Bapchild as follows⁶:

'It contains about 1300 acres of land, of which not more than ten acres in the southern part of it are wood; that part of the parish on the northern side of the road is a flat and low country, almost on a level with the marshes, and is equally unhealthy as Bapchild, perhaps more so, even to a proverb, as lying lower, and rather more exposed to the marsh vapours; however the lands are exceedingly fertile for corn, being the same kind of round tilt land which extends along this plain. There is no village, the church stands about a mile northward from the road; the scite of the old castle is three fields only from the north side of the road, and is plainly seen from it.'

- 3.2 The following maps, covering 150 years from the late 18th century (almost exactly when Hasted was writing), show how the landscape around the later country park gradually evolved, with substantial changes to its character. In 1796 there were still traces of the medieval landscape, notably in strip-field boundaries. By the 1870s these had been swept away and the landscape improved. By 1897 there had been a radical change, with the large-scale planting of orchards across the whole area. These remained a widespread feature of the countryside around Bapchild until at least the late 1960s. There are far fewer today, although there is a commercial orchard between the Site and the country park.



Figure 3.1 The first systematic detailed mapping was by the Ordnance Survey in 1796. There is a hint that the ornamental grounds on the castle site seen in 1872 are already established. Occasional orchards stand around Bapchild and the castle site. An irregular pond appears to lie south of the spring head. On the north-east edge of Bapchild, and east of it, are what appear to be enclosed open-field strips. Source: BL OSD 113.

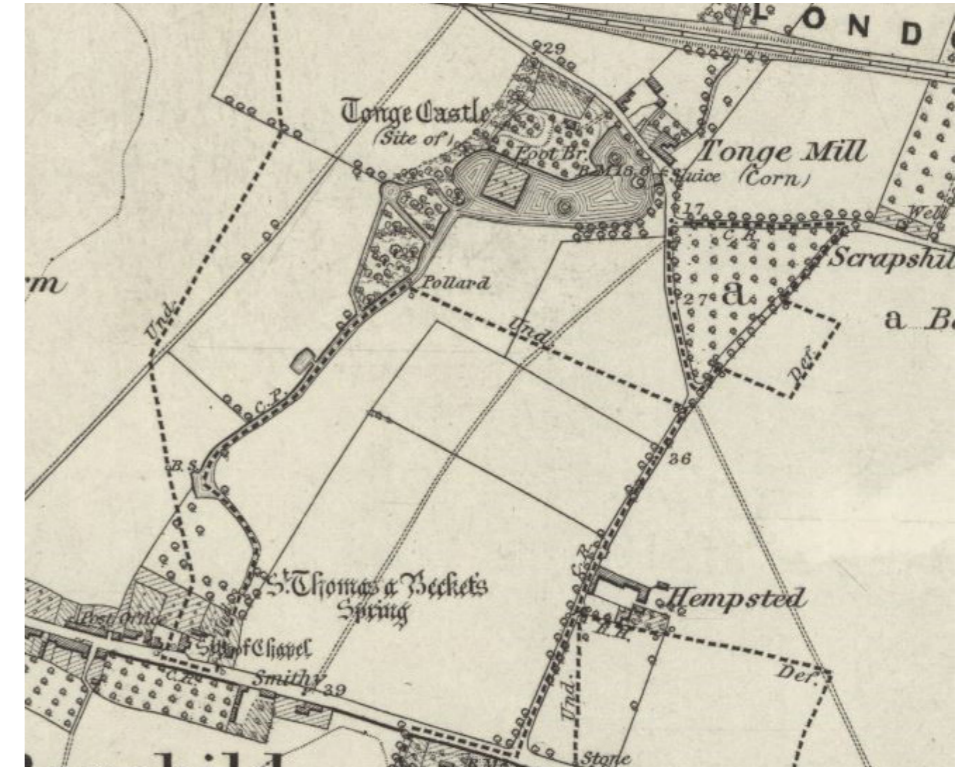


Figure 3.2 By 1872 the softly curving field boundaries have been straightened, and north of the village the narrow east-west fields have been removed. The castle site appears to be laid out as ornamental grounds, with a square island forming a probably formal garden in the mill pond. Source: OS 25 inch map, Kent sheet XXXIII.2

⁶ The History and Topographical Survey of the County of Kent: Volume 6. Originally published by W Bristow, Canterbury, 1798 at <https://www.british-history.ac.uk/survey-kent/vol6/pp132-143>

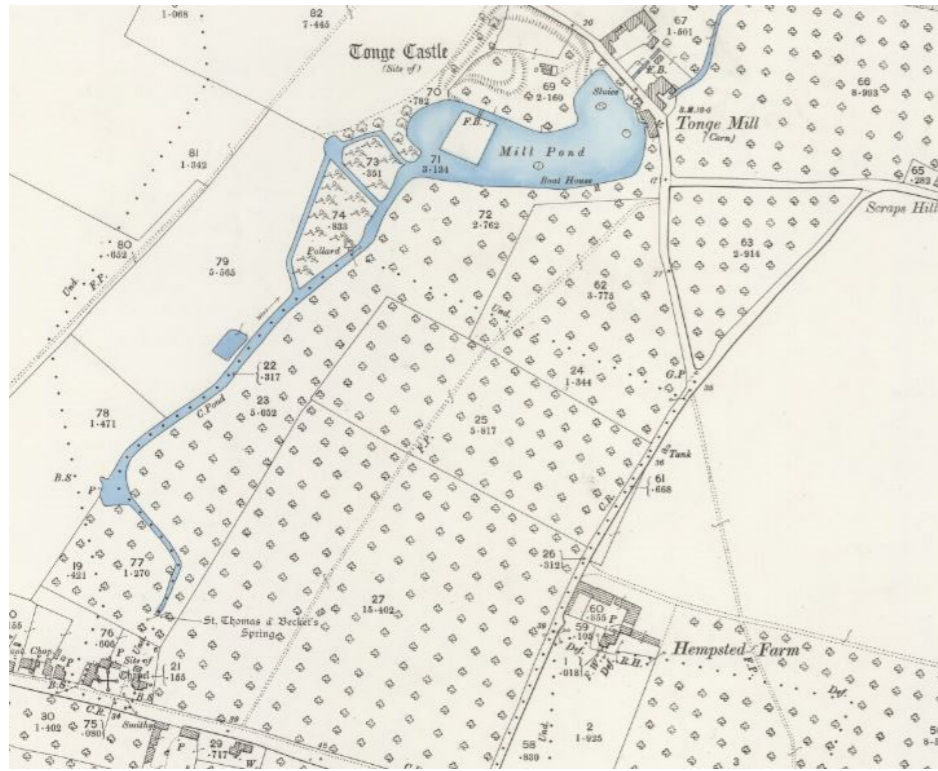


Figure 3.3 The landscape in 1897. The hospital site and spring are marked. East of the mill stream, and south of the Watling Street, much of the land has been planted as orchards which are now the dominant land-use: virtually a monoculture. Source: OS 25 inch map, Kent sheet XXXIII.2

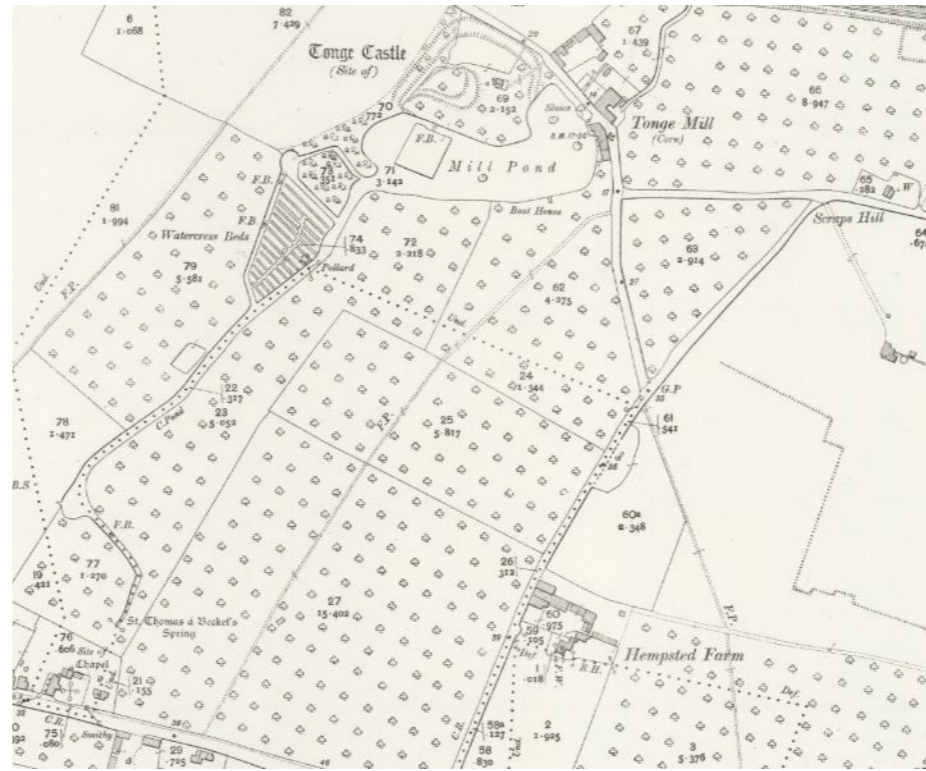


Figure 3.4 By 1908 an orchard has been planted west of the mill stream, and watercress beds established. Source: OS 25 inch map, Kent sheet XXXIII.2

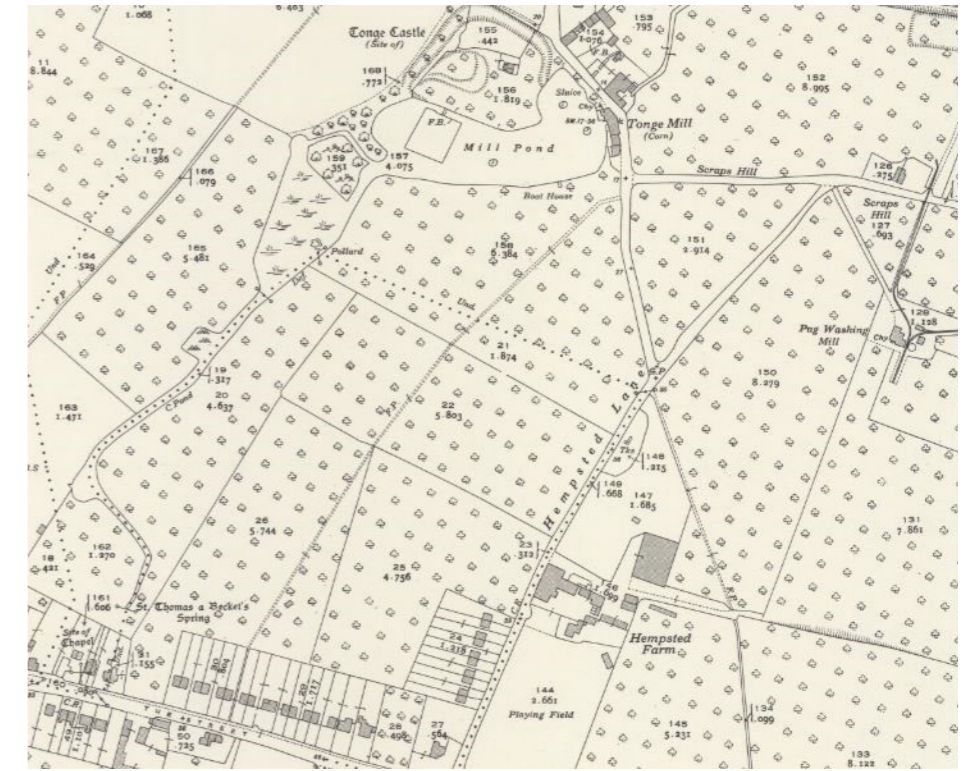


Figure 3.5 By 1946 even more orchards have been planted. The square island in the mill pond remains. Source: OS 25 inch map, Kent sheet XXXIII.2

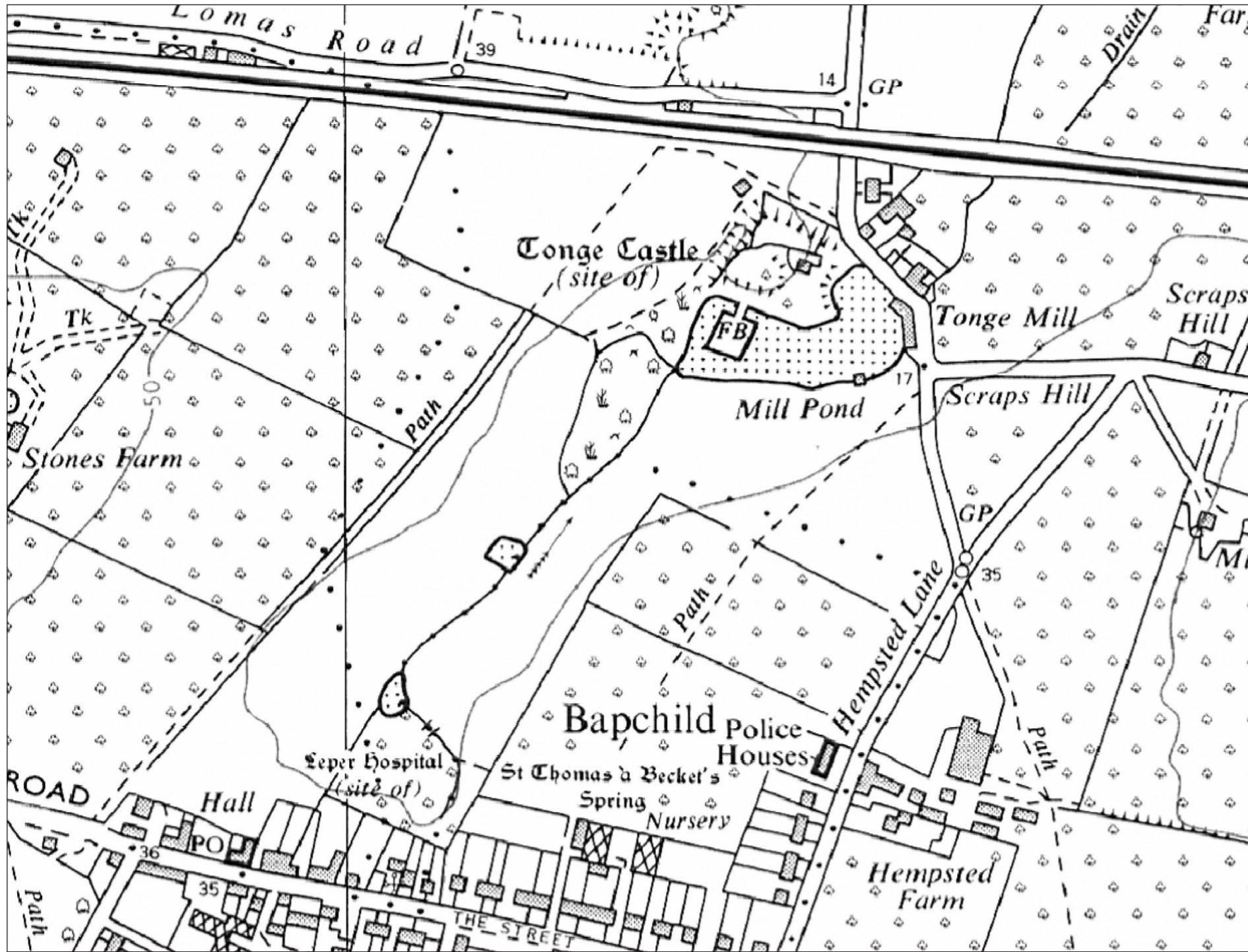


Figure 3.6 By 1967 orchards have been cleared from south of the mill pool. Fruit trees remain on the Site, with a nursery and glasshouses behind the houses fronting the A2, 'The Street'. The square garden island remains in the mill pool. Source: Promap.

THE CONSTITUENT ELEMENTS OF THE CONSERVATION AREA TONGE CASTLE

- 3.3 The earliest description of Tonge Castle appears in Hasted's 1797 History of Kent: 'There is no village, the church stands about a mile northward from the road [the Watling Street/A2]; the scite of the old castle is three fields only from the north side of the road, and is plainly seen from it. It consists of a high mount, containing about half an acre of ground, thrown up out of a broad and deep moat, which surrounds it, the north-west part of which is nearly dry, but the springs which rise on the South-west side of it, and formerly supplied the whole of it, now direct their course into a very large pond on the eastern side of the moat, and produce so plentiful a supply of water there, as to afford sufficient to turn a corn-mill.'
- 3.4 No modern topographical survey of the site has been undertaken to improve on Hasted's description, and in general the earthworks appear much mutilated and probably flattened. A large 20th-century bungalow stands on the site, perhaps replacing a building shown on the large-scale OS between 1897 and 1946.



Figure 3.7 View north-west to castle site across mill pool. The modern house stands in the centre of the picture.

7 [The History and Topographical Survey of the County of Kent: Volume 6](https://www.british-history.ac.uk/survey-kent/vol6/pp132-143). Originally published by W Bristow, Canterbury, 1798 at <https://www.british-history.ac.uk/survey-kent/vol6/pp132-143>

- 3.5 It has generally been assumed that Tonge castle originated as a Norman motte and bailey. However, there is no proof of this, although it is not improbable given its potentially strategic location on the Watling Street. The evidence of excavations on the site in 1963 and 1965, never properly written up, suggested occupation on the site from perhaps the 12th century.⁸ Overall it was considered that the evidence was indicative more of a manorial site than a castle.
- 3.6 The excavators associated later medieval activity on the site with a 1448 a licence to crenellate Tonge – that is, fortify it with battlements – granted to its owner, *Thomas Browne, king's squire*.⁹ However, this was clearly a 'portmanteau' grant of favour, probably purchased, as it also gave permission for four more of Browne's manors in Kent and Surrey to be similarly crenellated, and for him to inclose up to 1,000 acres of his demesne lands in each of the said manors as parks, together with other privileges. Without documentary or physical evidence it is impossible to know whether any work took place as a consequence at Tonge. There is no reason it should have – it was a very wide-ranging grant of permissions, and certainly there is no mention in any documents of a park at Tonge.
- 3.7 When the site was abandoned and cleared is unknown. That Hasted made no reference to this suggests it was well before the late 18th century. As the above mapping shows, the site was laid out as ornamental grounds between at least the late 18th century and the later 19th century. The maps do show a building on the site, but it is very small, perhaps more a summerhouse than a dwelling. One possibility that the grounds were associated with the mill house.
- 3.8 Local sources of information, from the country park notice board to (rather concerningly) *A Heritage Strategy for Swale* (2020), make much of the supposed connections with the legendary (i.e. fictive) Dark Age figures of Hengist, Horsa and Vortigern. This, of course, is a complete nonsense, concocted by Hasted on no basis whatsoever in the late 18th century.
- 3.9 *Designations: none, the site is not scheduled, although it is listed on the Historic Environment Record: number TQ 96 SW 35*

PUCKESHALL, OR TONGE, HOSPITAL¹⁰

- 3.10 The hospital of St. James, 'Pokeleshal,' in the parish of Tonge, is first referenced in 1252. The hospital seems to have been closed at the Dissolution, and in 1546 the possessions of the fraternity or hospital in Tonge were valued at £7 13s. 4d. yearly, with deductions of £1 9s. 4d., the net income thus being £6 4s. The certificate also mentions a chalice of silver and gilt, a vestment and all things belonging to it, and two bells, valued at 30s. This suggests that, as was usual, some form of chapel or oratory formed part of the establishment. In about 1540 John Leland speculated that the buildings had by then already been demolished, but had no proof of that. The hospital site and its lands in Tonge and Bapchild were granted in 1557 to Sir John Parrott.¹¹
- 3.11 The hospital's site is marked on early large-scale OS mapping¹² as 'Site of Chapel', on the north side of the Watling Street (the modern A2), immediately south of the spring head, itself labelled 'St Thomas of Becket's Spring.' The location of the hospital, on the main pilgrim route from London to Canterbury (the experience vividly captured in *The Canterbury Tales*, written by Geoffrey Chaucer between 1387 and 1400), strongly suggests that its primary purpose was to offer accommodation to pilgrims travelling to, or from, the tomb of Thomas Becket in Canterbury cathedral. He was martyred in 1170, and it is likely the hospital was founded at some stage after that. The spring was presumably its fresh water source, with its later name remembering how the hospital provided accommodation for Canterbury pilgrims.
- 3.12 Over seven hundred hospitals were founded in England between the Norman conquest and the middle of the 16th century. Their primary function is indicated by their name, derived from the Latin word *hospitalis*, meaning being concerned with hospites, or guests, that is any persons who needed shelter. Some hospitals were, therefore, erected for the use of pilgrims and other travellers; others were really almshouses (and in all over 850 hospitals and almshouses are known from medieval England), intended chiefly for the poor aged and infirm, especially those suffering from leprosy.

¹⁰ 'Hospitals: Puckeshall or Tonge', in *A History of the County of Kent: Volume 2*, ed. William Page (London, 1926), p. 224. British History Online <http://www.british-history.ac.uk/vch/kent/vol2/p224> [accessed 9 November 2020].
¹¹ *The History and Topographical Survey of the County of Kent: Volume 6*. Originally published by W Bristow, Canterbury, 1798 at <https://www.british-history.ac.uk/survey-kent/vol6/pp132-143>
¹² E.g. OS 25 inch Kent XXXII.2 (1897)

- 3.13 *Designations: none, the site is not scheduled, although it is listed on the Historic Environment Record: number TQ 96 SW 34*
- TONGE MILL (GRADE II)**
- 3.14 The mill stands on the north side of the mill pond. Domesday notes a water mill in the manor, quite possibly on the present site. The mill was rebuilt as a steam mill in 1837 (datestone).
 - 3.15 The List entry reads: *Mill and mill house. 1837 and 1866. Yellow stock brick and slate roofs. Convex curving range of 4 buildings and stack along the roadside. To left: 2 storey and hipped block with loft door and glazing bar sash on first floor, 2 blocked windows on ground floor. Centre: Mill house, 3 storeys on plinth with pilaster strip quoins and parapet. Two glazing bar sashes on second floor, 1 on first floor with loft door, 2 on ground floor with central boarded door in semi-circular headed surround with plaque over inscribed: T D 1837 To right: 2 storeys and sloping roof with 1 glazing bar casement and boarded door in large semi-circular headed surrounds on ground floor, with plaque over door, inscribed: B + S 1866 Similar block to right, no openings and chimney, approx. 100 foot height, square section and tapering with oversailing cornice cap. Designations: Listed Grade II (List Entry Number:1338569; Date first listed:27-Aug-1952)*



Figure 3.8 Tonge Mill from the south-west

⁸ <http://www.gatehouse-gazetteer.info/English%20sites/1674.html>
⁹ Calendar of Charter Rolls Vol. 6 p. 102

MILL HOUSE OLD MILL

3.16 Water mill, now 2 houses. 1759. Timber framed and weather boarded on ground floor of chequered red and grey brick, with plain tiled roof. Three storeys (the upper 2, timber framed, leaning severely away from the road) and paired modillion eaves to hipped roof. Three wood casements and shuttered window opening to right on second floor. 4 glazing bar sashes and blocked loft door to right on first floor, and 5 glazing bar sashes on ground floor with boarded door to right and door of 6 raised and fielded panels to left with traceried rectangular fanlight. Plaque at centre of ground floor inscribed: R H 1759

Designations: Listed Grade II (List Entry Number 1069265; Date first listed:21-Mar-1985)

3.17 Two listed 17th-century and later buildings stand on the north side of the A2, on or close to the site of the medieval hospital (NHLE 1343896, and 1115443).



Figure 3.9 The mill house from the south.

ASSESSMENTS OF SIGNIFICANCE

TONGE CASTLE

- 3.18 The supposed castle site is not scheduled, which would identify it as a site of national importance. However, many sites which meet the tests of 'national importance', as defined by Historic England, are similarly unscheduled as the designation is discretionary. Sometimes (as with moated sites) there are so many examples that only a selection is scheduled, and certainly castle sites are numbered in their hundreds. In other cases scheduling would add nothing where a site is secure and well manged.
- 3.19 In this case were scheduling to be considered, taking the HE selection guide to 'Pre-1500 Military Sites' as a guide, it is unlikely that such a designation would be recommended. That is because there is little real understanding of the original date and character of the site, because it is much degraded, and has a substantial modern house and its garden on its interior.
- 3.20 However, while denuded, its remains are visible from the public realm, and well-known, as might best be assessed as having local interest.

TONGE HOSPITAL

- 3.21 Again, the supposed hospital site is not scheduled. If the traditional identification of the hospital's location is correct, its site was probably already built over by the end of the 19th century. As noted above, there were some 700 hospitals in the Middle Ages meaning this is not a rare site-type, although the location of this example on a major pilgrim route would add to its interest.
- 3.22 The site will be on the Kent HER, and again might best be assessed as having 'local list' quality.

ST THOMAS BECKET'S SPRING

- 3.23 While a natural feature, this has been an important water source since at least the late 11th century by when it seems likely there was a mill on the pool which the springwater feeds. As noted above, it was presumably the clean water source for Tonge Hospital, and perhaps for passing pilgrims. Many such springs and wells were believed to have had healing properties, but there is no known tradition of this spring having claimed properties of this sort.¹³
- 3.24 As it is likely the spring head has historically seen modification, it again might best be assessed as having 'local list' quality.



Figure 3.10 Becket's Spring. Source: The Megalithic Portal.

¹³ Notwithstanding the claim in A Heritage Strategy for Swale (2020), 50

THE CHARACTER OF THE COUNTRY PARK

- 3.25 The country park is small, and very much focussed on the mill and mill pool. The ground to the south of the pond is partly planted with mature apple trees, no doubt remnants of the former orchards here which in 1946 and later extended as far as the pool. East of this is woodland, now managed as coppice.
- 3.26 Approaching the south edge of the pool the trees thin and the ground becomes fairly open. From here what is a fairly closed view to the mill and the castle site opens up; this, as noted, is very much the core of the park, where its public information board is sited.
- 3.27 The other key area in terms of heritage assets is the road north of the mill, between it and the mill house on the opposite side of the road, and further to the converted barn etc which stand just beyond.
- 3.28 Presumably the arm of the country park extending south the capture Becket’s Spring and the watercourse to the mill pool was included to do just that. As far as can be seen, there is no access other than from the area south of the mill pool. There is no way this area can be included on any kind of circuit walk; you would walk down it, and then return by the same route.

SUMMARY

- 3.29 In summary, the Tonge CA is unusual in its form and character. It comprises a collection of related built heritage assets, remnant earthworks and natural landscape features set within a small recreational country park whose form, particularly to the east, follows land boundaries largely established in the later 20th century.
- 3.30 The area has a long history of settlement related to the presence of a water source – the ‘Thomas Becket’ spring – and associated stream which runs through the area along its western boundary and feeds a mill pond to the north. The built heritage now present in the area is focussed at its northern edge and comprises the earthworks of Tonge Castle as well as 19th century examples of Kentish vernacular industrial architecture. Most prominent, and with a landmark quality, is the Grade II listed Tonge Mill, a 19th century steam mill on the site of an earlier water mill.

- 3.31 To the south, the CA boundary extends to include the line of the stream and the spring. The spring is likely to have been the water source for the hospital of St. James, ‘Pokeleshal,’ in the parish of Tonge, the supposed site of which, to the south of the spring head, may be under the modern housing now fronting the A2. While a natural feature, this has been an important water source since at least the late 11th century and is of local interest.
- 3.32 The historic evolution of the CA’s landscape and its landscape setting has undergone significant change, both in terms of its boundaries and its use. The historic map regression suggests the land to the north-east of Bapchild to have been characterised in the 18th century by enclosed open-strip fields, which had been removed by the time of the 1872 OS. The 19th and early 20th centuries saw the rapid expansion of orchards on a commercial scale, which extended to meet the banks of the both the mill pond and the stream.
- 3.33 The present configuration of the land to the south of the mill pond – known as the country park – dates from post WWII, when the orchard landscape began to be cleared to the south of the mill pond and along the eastern bank of the stream. 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.
- 3.34 The inclusion of these areas, it is assumed, relates to their recreational rather than historic value.

4.0

**THE CONSERVATION AREA'S SETTING:
PERAMBULATION**

LAND NORTH OF THE STREET, BAPCHILD

THE CONSERVATION AREA'S SETTING: PERAMBULATION

OVERVIEW

- 4.1 The Tonge CA is located between the mainline railway to the north, and the A2 (Watling Street) to the south. Inter-war semi-detached housing, the gardens of which extend northwards, lies between the stretch of the A2 (London Road) known as The Street, and the Conservation Area. The houses extend on a right-angle along the west side of Hempstead Way, to the east of the CA.
- 4.2 Church Road joins Hempstead Way and extends along the north-eastern boundary of the CA, and on through the mill complex. To the west, the spring and associated stream form a natural boundary, extending along its tributary and enclosing the remains of Tonge Castle on its western side.
- 4.3 The transport networks to the north, south and east of the Conservation Area and the associated built form to the south and east serve to enclose the Conservation Area from the wider landscape on these sides. The enclosed character is reinforced in large part by both mature vegetation and the topography of the area; the landform to the north of the road is flat and low-lying, below much of the surrounding land owing to the presence of the spring and mill pond.
- 4.4 To the west, the landscape is more open, although wooded belts and mature trees likewise characterise the northern part of this side of the CA and wholly occlude views to the west. The southern part has a more open form; agricultural land extends to meet the stream on its western side. The character of the land bordering the CA to the west is emerging and subject to a recent consent (14/501588/OUT) for c.550–600 dwellings and associated infrastructure and landscaping.

- 4.5 Overall, therefore, one of the defining landscape characteristics of the CA is its enclosure as a result of the landform and the mature hedgerows and shelterbelts that surround it. The character reflects the 18th century description of the area by Hasted: 'that part of the parish on the northern side of the road is a flat and low country, almost on a level with the marshes, and is equally unhealthy as Bapchild, perhaps more so, even to a proverb, as lying lower, and rather more exposed to the marsh vapours'. This is equally a characteristic recognised by the CA Appraisal under 'Landscape Description' at page 21. As a consequence, the visual relationship of the CA with its wider landscape setting is restricted and in many areas wholly occluded.
- 4.6 The physical and visual containment of the much of the CA necessarily limits the contribution made by its wider setting to one's appreciation of its special interest. A more detailed discussion of setting is provided below, with particular reference to the Site which lies adjacent to the CA's eastern boundary to the south.

THE SETTING TO THE NORTH AND NORTH-EAST

- 4.7 The setting to the north-east of the CA comprises Church Road, Scraps Hill and an open field adjacent to and rising away from the mill house. On the northern approach, the road is bound by dense hedgerows, preventing intervisibility with the CA which lies to the west. As views become more open as one reaches the mill complex, the landform to the north-east rises, and longer views are prevented by virtue of dense vegetation marking the line of the railway. The topography and the boundaries formed by the road and railway embankment divorces the CA from its wider surroundings (see **Figures 4.1 and 4.2**).



Figure 4.1 Looking towards the rising land to the north-east from Church Road, adjacent to the Mill complex. The topography and the vegetated railway embankment serve to enclose the CA from its wider setting



Figure 4.2 Dense vegetation along Church Road restricts intervisibility with the CA to the north-east.

- 4.8 Church Road eventually leads to the historic settlement of Tonge to the north, the focus of which is the early-medieval Church of St Giles which lies on the east side of road approximately 330m from the boundary of the Conservation Area. There is a historic functional relationship between the church, Tonge Castle and the mill complex, all being part of the same parish.
- 4.9 The railway delineates the northern boundary of the CA, and its raised embankment serves as a prominent physical and visual barrier between the CA and the landscape to the north. Thus, the relationship is confined to an historic one, as there is no functional relationship nor any visual relationship between the Conservation Area and the settlement of Tonge.
- 4.10 Given the visual and physical containment of the Conservation Area to the north-east and north, the contribution made by the wider setting is limited. The open land to the north-east of the mill complex provides an attractive setting to the CA on this side, but elsewhere there is little opportunity for views into and from the Conservation Area on these sides. The exception is views towards the grouping of historic buildings obtained on the approach from Lower Road, which turns into Scraps Hill; in these views the mill chimney is a discernible element that appears in context with its associated buildings and announces the presence of a historic complex.
- 4.11 The contribution made by the settlement of Tonge to the north to the significance of the Conservation Area is limited to an historic association.

SETTING TO THE WEST AND NORTHWEST

- 4.12 The northwest boundary of the Conservation Area runs along the edge of the Tonge Castle earthworks, on which now stands a modern bungalow. The boundary is densely vegetated; only glimpsed views of the castle earthworks are possible from the public footpath running around the edge of the boundary. One is also aware that the castle is not publically accessible.
- 4.13 This area of land, bordered by the railway embankment to the north comprises Area TCA2 in the draft Appraisal, proposed as an extension to the Conservation Area in recognition of its providing important historical context to the Conservation Area; it is the site of a former windmill, and includes the original access point to the castle and mill.

- 4.14 The public footpath leads through a young copse of trees along the western boundary of the Conservation Area before departing from the boundary westwards. Views are afforded towards the south and east from this point, but dense, mature vegetation restricts any intervisibility with the Country Park and castle. Looking southwards, the only visual indication of the presence of a spring is the finger of vegetation that lies in a dip in the land. Beyond this, development along the A2 can be seen in the distance.
- 4.15 At the time of writing, the stretch of the public footpath from the west of the Conservation Area running southwest to the Fox and Goose was inaccessible due to present development works, assumed to be associated with 14/501588/OUT. The land in this area is thus in a state of transition.



Figure 4.3 Looking northwards from just north of the castle earthworks across Area TCA2; a proposed extension to the Conservation Area



Figure 4.4 Looking southwards from the public footpath to the northwest of the CA. The dense vegetation of the CA boundary frames the view on the left and the green finger of vegetation represents the location of the spring. The urban edge along the A2 can be seen in the background



Figure 4.5 Looking southwards from the public footpath to the northwest of the CA. The dense vegetation of the CA boundary frames the view on the left and the urban edge along the A2 can be seen in the background

SETTING TO THE SOUTH AND SOUTH-EAST

- 4.16 As noted, the A2 runs along the south side of the Conservation Area, separated from it by inter-war housing development and their associated plots. The A2, formerly Watling Street, is now an intensively used and built-up thoroughfare but represents an historic association with the Conservation Area. The spring head is located approximately 65m north of the road, and is assumed to have been the fresh water source for the medieval hospital which stood close by, outside the modern Conservation Area.
- 4.17 This historic link between the road and the spring head is not detectible visually, and the inter-war development has served to sever the spring head and Conservation Area from the road at this point. Closely-spaced inter-war housing now lines the north side of the A2.
- 4.18 Further to the east from the spring location, approximately 110m from the Conservation Area boundary, there is a public footpath running from the A2 to the Site. This is a narrow way between two houses, with views opening up as one reaches the southern boundary of the Site. The footpath is well established, bordered by barbed fences and bramble hedges (Figure 4.6).



Figure 4.6 View northwards along the public footpath, from the south side of the site – in the location of View 5a of the draft Appraisal

- 4.19 The Conservation Area edge is visible to the north and west in this view; the mill chimney is discernible in front of the viewer in the distance but no other built form or features within the Conservation Area, other than vegetation, are discernible. As such the view alone does not suggest to the viewer that they are perceiving features of heritage interest.
- 4.20 The draft appraisal mentions the area to the south and east of the Conservation Area within the description of setting (pages 35–36): *‘There is a commercial orchard and field with rough grazing to the south and east of the Conservation Area boundary. This is then bounded by Hempstead Lane with a modern ribbon development of houses and Hempstead Farm beyond to the west.’ (p.35)*
- 4.21 The Site is thus described as a ‘field with rough grazing’. It appears as a relatively flat area of scrubland in the setting of the Conservation Area, gently sloping away to the northwest, severed by the footpath which cuts it in two. The present route of the footpath dates from the 19th century. It formerly ran adjacent to the stream head and cut across the top Site area diagonally, as shown in the OS map of 1796.
- 4.22 Inter-war housing along Hempstead Way, moving into modern ribbon development and a cluster of evergreen trees, frames the right of the view (see Figure 4.7). A modern industrial barn associated with Hempstead Farm can be seen at the corner of the Conservation Area to the north-east. The collection of buildings experienced in conjunction with the plain and bleak nature of the Site do not form a positive component in the setting of the Conservation Area; nor do they contribute to its significance.



Figure 4.7 Looking north-east towards the ribbon development along Hempstead Way from the public footpath to the south of the site



Figure 4.8 View from the footpath at the south of the Site, looking eastwards towards inter-war housing on Hempstead Way

4.23 As one travels northwards along the footpath, the land to the west of the footpath, within the Site, appears to fall away. The field is terminated by a vehicular mud track at the north side, which runs from Hempstead Way to the northwest corner of the site through two sets of large metal gates (Figure 4.10). At the time of the site visit (5 November 2020) there was a cluster of refuse piles in the northwest corner (see Figure 4.10). This mud track and associated metal gates and area of former-carparking forms a detracting element in the setting of the Conservation Area; indeed it is mentioned in the draft Conservation Area Character Appraisal in relation to key negative characteristics in the setting of the Conservation Area:

'Former car park on eastern side of the Conservation Area in need of attention' (p.36)

4.24 Moving further north along the footpath, one leaves the site and moves in to the 'commercial orchard' which borders the Conservation Area to the east and north. The footpath drops down a small ridge between the site and the orchard, in a gap in the line of vegetation that forms the boundary between the two (Figure 4.11). This topographical shift, and the line of vegetation along the boundary, serves to separate the Site area from the orchard visually and physically.



Figure 4.9 View from the footpath at the south of the Site, looking northwest across the site. The former-car park area can be seen in the northwest corner to the right of the frame. The CA boundary is indicated by the vegetated field border



Figure 4.11 View from within the commercial orchard to the north of the site, looking southwards towards the site.



Figure 4.10 Looking west within the site towards the CA boundary. The former-car park area can be seen in the corner of the site.



Figure 4.12 The commercial orchard. View taken from the public footpath in the south of the orchard, looking towards the CA

4.25 The orchard itself comprises formal rows of small trees, separated by tracks of slightly elevated land running east-west (Figure 4.13). The comparatively small size of the trees and the formal nature of the planting contrasts with the larger and less ordered vegetation bordering the Conservation Area. The orchard is an attractive area with a distinctive character albeit visually separate from the Conservation Area owing to tall and dense vegetation along the boundary (Figure 4.14). Accordingly, one has to move into the CA and enter the country park to discern its character and significance.



Figure 4.13 The commercial orchard



Figure 4.14 View from the north side of the commercial orchard looking towards the CA

5.0

CONTRIBUTION OF THE LAND COMPRISING THE SITE

LAND NORTH OF THE STREET, BAPCHILD

CONTRIBUTION OF THE LAND COMPRISING THE SITE

5.1 Our analysis above has considered the setting of the CA, its constituent elements and the relationships between them. Here we analyse in more detail whether, and to what degree the Site contributes to special interest of the Tonge CA or the appreciation of that special interest, taking into account the perambulation discussed above.

5.2 We make our assessment with due regard to best practice guidance as set out in **Section 2.0**, including the checklist provided in GPA3 pertaining to the assessment of setting. We frame our discussion around two principal considerations: visual setting and perceptual considerations; and historic and functional relationship.

VISUAL SETTING CONSIDERATIONS

VIEWS TOWARDS THE CONSERVATION AREA FROM THE SITE

5.3 The Site currently comprises a relatively flat field surrounded by vegetation along each boundary, and inter-war and ribbon housing development on the south and east sides. The form of the field and its boundary hedges have no obvious historic character and we know from historic mapping that the field forms of this area dates from the late 19th century when the modern field boundaries were set out.

5.4 There is a lack of topographical features within the Site and it has no distinguishing characteristics beyond the public footpath that crosses it north-south.

5.5 The field contains areas of low grade surfacing associated with previous uses; these comprise the track and former-car park along the north edge, identified in the draft appraisal as a negative characteristic within the setting of the CA. We agree with this assessment: the track is accessed through unattractive, utilitarian modern gates which link it perceptually with the developed edge of the settlement.

5.6 A distant view towards the top of the mill chimney is obtained in views northwards over the Site from the public footpath. This view is identified in the draft Appraisal as a 'panorama featuring a focal point or points'; View 5a. The view is characterised in the draft Appraisal as follows:
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.

5.7 We have reflected carefully on this drafting and offer the following observations based on our site visit:

- We agree that the Council is right to identify this view as having value, albeit we note that the mill chimney is glimpsed and does little more than indicate the presence of an industrial feature at some distance.
- An understanding of the mill within a rural context is best appreciated from within the CA itself and accordingly one has to enter the country park to discern the particular qualities of the listed building or historic group, and their relationship to their immediate setting. Thus we do not consider that the view is of any particular quality beyond providing a point of focus for the viewer, contributing to a sense of arrival or event.
- We do not consider the categorisation of the view as a panorama or its descriptive text to accurately convey its quality or character. To the contrary, we consider the view to be directional and of the mill chimney, to which the eye is drawn along the footpath in the foreground. For completeness, we reproduce the definition of 'panoramic' in the Oxford English Dictionary:

1 (Of a view or picture) with a wide view surrounding the observer; sweeping

The view does not have this sweeping quality. The land is flat and low-lying, and inter-war and modern ribbon development frames the right of the view. This and the framing of the pathway by vegetated barbed fences serves to limit the visual experience and invite the viewer to look ahead rather than around.

Further, there is no noticeable visual connection between the Site and the elements that convey the special interest of the CA to the west. The boundary hedgerow prevents intervisibility with the spring, and while it may suggest to a discerning viewer the presence of a water course beyond it, there is nothing to convey its claimed associative qualities. Accordingly, unless one is aware of the historic background, there is nothing to suggest special interest.

Thus, the current description suggesting that one can 'appreciate the relationship of the spring, stream and mill' we consider to be overstated.

- The agricultural use of the land view makes no material contribution to the composition of the view, its quality or character. By contrast, the land appears as a low quality field with an edge-of-settlement character, of no intrinsic quality and with no historic or distinguishing features. The land each side of the footpath contributes nothing beyond not blocking the view. We note that the 19th century was a period of intensification of land use and urban growth; there would be nothing incongruous with seeing the form of the chimney from a planned urban landscape.



Figure 5.1 View 5a in the draft Appraisal

VIEWS FROM WITHIN OR LOOKING ACROSS THE CONSERVATION AREA TOWARDS THE SITE

5.8 There are no views of the Site afforded from the country park to the north, which is focussed on the mill pond and buildings and enclosed in its character. There is more visibility from the southern part of the country park as it borders the stream, where the vegetation is less dense. In these views, the urbanising influences of the settlement edge and the A2 are pronounced.

5.9 The Council has identified a 'dynamic panorama' view looking across the stream, country park from the public footpath located outside the Conservation Area to the west. This is View 6b in the draft Appraisal and is described as follows:

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



Figure 5.2 View 6b in the draft Appraisal

5.10 Views along this footpath in either direction have no obvious historic character: in the photograph reproduced by the Council this part of the CA appears as a pleasant piece of recreational land framed by and understood in the context of the settlement edge, of which the Site forms part. The presence of the A2 is marked through considerable road noise as well as the built environment that addresses it. The stream and spring head, which may be perceptible to the observant viewer, display no feature to convey their claimed associative value.

HISTORIC AND FUNCTIONAL ASSOCIATIONS

5.11 Our comprehensive assessment has not identified any historic or functional association between the Site and the CA.

5.12 The field boundaries have changed markedly; the route of the public footpath has changed likewise; and the use of the land and its character has altered dramatically. There is no evidence to suggest any peculiar historic functional connection of this land with the built heritage elements that comprise the CA.

5.13 The country park, as noted, is a later feature that follows boundaries established in the post-war period.

SUMMARY

5.14 Overall, the site has no inherent qualities of architectural or historic value evident today. Rather, it is an undistinguished area of open land characterised by inter-war housing and ribbon development associated with an urban edge and accommodating areas of previously developed land and associated utilitarian features. We agree with the characterisation on page 39 of the draft appraisal that the former-car park is a detracting feature in the setting of the CA.

5.15 Accordingly the contribution made by the Site to an appreciation of the significance of the CA is limited to the route it provides from the A2 to the CA via the public footpath and the glimpsed view of the mill chimney which communicates the presence of a feature of interest with an industrial character. The footpath itself, we consider, is a point of general amenity. The character of the footpath restricts the visual experience and invites a visual corridor that is at odds with the characterisation of views across this land as panoramic.

5.16 Accordingly, for the reasons set out above, we respectfully suggest that View 5a does not possess the attributes ascribed to it by the current drafting.

5.17 We turn here to the criteria in Historic England's setting guidance at the *Assessment Step 2 Checklist* at page 11, which is designed to help an assessor consider the asset in its physical surroundings and establish the contribution made by its setting to significance or an appreciation of significance. Following this approach in relation to the Tonge CA and the land comprising the Site, our findings are as follows:

- The CA has a self-contained character and is substantially enclosed from the surrounding landscape due to topography and vegetation. Notwithstanding, the surrounding landscape character of the CA has been subject to changes in land use and development since the 19th century and the southern part of the CA in particular is subject to urbanising influences;
- There is no historic functional relationship between the CA and the site other than the public footpath that has existed in its present arrangement since the 19th century. We consider the footpath as a feature of general amenity;
- The setting relationship between the Site and the CA is incidental, with no intentional intervisibility with other historic and natural features;
- The relationship is likewise weakened by later development, which runs along the eastern and southern boundary of the Site, comprising interwar and modern housing set in domestic curtilages and light industrial buildings to the east;
- Urbanising influences to this part are marked, including the character of the A2 as a busy thoroughfare its associated noise and activity;
- A glimpsed view of the upper part of the mill chimney exists across the land comprising the Site; this is incidental but nevertheless forms a focus in views northwards along the footpath and is accordingly of some value;
- In views across the CA from the west the Site is associated with the settlement edge and contributes nothing to an appreciation of the country park, itself a post-WWII feature;
- The character of the Site does not enable any understanding or appreciation of the spring and stream and conveys nothing of their claimed historic value associated with tradition.

APPENDIX 1: PAUL STAMPER CV

LAND NORTH OF THE STREET, BAPCHILD

REPORT AUTHORSHIP

Dr Paul Stamper is a specialist in the English landscape and its buildings. He has a BA and a PhD from the University of Southampton, and is a Fellow of the Society of Antiquaries and a Visiting Fellow at the Centre for English Local History at the University of Leicester.

He has been directly employed in researching and managing England's historic environment for almost 40 years, firstly with the Victoria County History and for 20 years with English Heritage/Historic England. There he had various roles after joining in 1996 as an Inspector of Historic Parks and Gardens to work on the revision of the Register of Historic Parks & Gardens. Over four years he revised roughly 170 register entries.

Later, as a Senior Adviser in the Designation Department, he was responsible for overseeing the writing and, later, revision of the 44 designation selection guides covering listing, scheduling, the two registers (battlefields and designed landscapes), and ships and boats <https://historicengland.org.uk/listing/selection-criteria/>. These are complemented by over 50 Introductions to Heritage Assets – which again he commissioned and edited – which provide concise, authoritative overviews of particular types of archaeological site, building, or designed landscape, e.g. <https://historicengland.org.uk/listing/selection-criteria/listing-selection/ihas-buildings/>. *At various times he also assisted with high-level appeals and case reviews, principally concerning contentious listings.*

After leaving Historic England in 2016 he set up his own consultancy, Paul Stamper Heritage <https://paulstamperheritage.wordpress.com>. Most of its work involves assessing the significance of historic buildings and landscapes, including historic parks, and the likely impact of proposed changes.

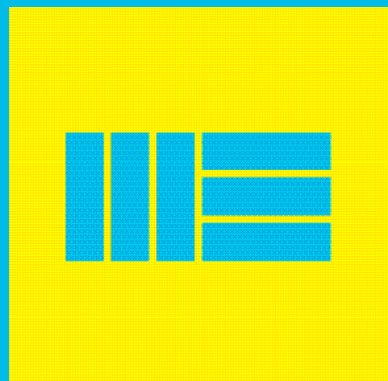
Paul Stamper has published extensively through monographs, articles and book reviews.

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