



Mr Paul Batchelor
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Direct Dial: 0207 973 3655

Our ref: L01142612

23 January 2020

Dear Mr Batchelor

**Arrangements for Handling Heritage Applications Direction 2015
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**IGHTHAM MOTE MOTE ROAD IVY HATCH SEVENOAKS KENT TN15 0NT
Application Nos 19/02843/LB & 19/02842/FL**

Thank you for your letters of 10 December 2019 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

Historic England engaged in constructive pre-application discussions with the National Trust and Local Authority on this proposal for rationalised car parking and landscape enhancements at Ightham Mote. We consider the proposal causes some harm to heritage significance, but that this is less than substantial. The application also provides a significant number of heritage benefits which are capable of revealing parts of the ornamental garden lost due to their current use as a car park. Wider benefits also include enhanced visitor movement throughout the site which assists in management of visitor flow to the grade I house and the reinstatement of the line of the North Drive to once again illustrate one of two key visitor approaches to the medieval estate.

In reaching a decision on this proposal your Council will need to consider whether the harm has been avoided or minimised and that any remaining harm has clear and convincing justification before weighing the harm against the public benefits (NPPF paras 190, 194 and 196). Our assessment is that this application is capable of meeting NPPF objectives to avoid or minimise and justify any remaining harm and it proposes a number of significant heritage benefits to take account of in the weighing exercise, many of which are not possible unless the car park is relocated.



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We acknowledge this application proposes major change within the setting of highly graded heritage assets and we would be pleased to answer any questions about this advice as you consider this application.

Historic England Advice

Ightham Mote is famed as one of the finest small medieval moated houses in Kent. Built over several centuries, beginning in the 14th century, the resulting part-stone, part-timber courtyard house with clusters of ornate chimneys is highly picturesque, much admired and rightly listed grade I. Medieval water features including a moat and in-filled fish pond, are a scheduled monument and noted as one of the most informative examples of a manorial medieval moated site in the country, while ancillary buildings including the remains of a courtyard stable block and farm buildings to the south-west are listed grade II* and II. Collectively the group is of exceptional significance for the way in which it illustrates the magnificence of an important medieval estate and how such an estate functioned with a major house as the focal point of a working landscape. The core of Ightham mote including its ornamental garden is also designated as the Ightham Mote conservation area.

Part of the drama of Ightham is its landscaped setting. A comprehensive assessment of the contribution of setting to the significance of designated heritage accompanies the application. This concludes that the ornamental landscape was always confined to the valley bottom and sides while the wider landscape was part of a working estate. Within the ornamental garden, the assessment concludes that the area of the current car park detracts from significance because the presence of cars and subsequent landscape changes to accommodate parking compromise an ability to appreciate that these areas were historically ornamental gardens and a component of the arrival experience along the North drive.

The assessment also considers the wider estate and defines areas which make a greater or lesser contribution to significance depending on the extent to which the historic landscape character survives. We agree that woodland and assarts to the north of the house, which survive as intact medieval landscape features and contribute to our knowledge and appreciation of Ightham's historic landscape setting, make an important contribution to the significance of designated heritage. On the other hand, fields to the east and west of Ightham (identified as Greensand arable and including the proposed site of the car park) have been heavily modified with field boundary's lost or moved, though they do contribute to aesthetic values as an attractive green backdrop in long views of Ightham Mote and as working agricultural fields they help explain the story of Ightham Mote as a house at the centre of a working estate. Overall, we agree these fields make a lower contribution to the significance of designated heritage.



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The proposal and impacts and enhancements to heritage significance

This application proposes the construction of a new car park (307 spaces laid out in gravel, 121 overflow spaces, 40 staff spaces and 3 coach bays) on land east of the north drive, a new visitor centre and landscape enhancements including in areas currently used for car parking at Ightham Mote. Historic England engaged in detailed pre-application discussions with the Trust and Local Authority as these proposals were refined and we hope the following is helpful as your Council considers this application.

Relocating the car park to the southern end of a field east of the North Drive does cause some harm to heritage significance because it represents development on land which historically functioned as part of a working estate and thus has remained undeveloped throughout the history of the site. To an extent that harm is minimised through sensitive landscaping proposals for the car park including naturalistic finishes, but overall we conclude some harm remains. We are not concerned about the visibility of cars in key long views from the north-east and west of the site, and thus its effect on the aesthetic values of Ightham Mote because the applicant proposes effective screening as part of a comprehensive landscape strategy and this is well illustrated in verified views. In terms of the impact to the conservation area, removing the car park from within its boundary represents an enhancement, though relocating this to its immediate setting also causes a low level of harm to its significance as an understanding of its immediate landscape setting, which helps tell the story of Ightham as a house for the gentry and the core of a working estate, would be compromised to a low degree.

We also acknowledge our statutory duty to have regard to the purpose of enhancing and conserving the natural beauty of the Kent Downs AONB. The Kent Downs AONB is noted for its historic and cultural heritage which has created an “outstanding heritage and time depth to the Kent Downs”. In assessing this application we conclude the proposal would not impact significantly on elements of the historic environment which contribute to the Kent Downs AONB because of the way in which the visual impact of the proposal is significantly mitigated through a comprehensive landscape strategy. We note the proposal also includes a number of enhancements to the Kent Downs AONB as noted below.

We consider the wider proposal offers significant enhancements in heritage terms which meet NPPF aspirations to reveal or enhance significance (NPPF, Para 192 (a)). These enhancements include the reinstatement of ornamental gardens in the current car park, the removal of trees on the eastern boundary of the North Drive to reveal and



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reinforce the visual relationship between the drive and wider agricultural setting, the reinstatement of the line of the North Drive to enhance an appreciation of the historic approach to the house, and the use of the walled garden as a productive garden space. The removal of a temporary visitor building is also an enhancement within the wall garden, while its replacement with a larger visitor reception would not, in our view, add to the overall level of harm as it represents a sensitive piece of design which responds well to its historic context. We also encouraged the removal of a hedge between the south mill pond and moated house and are pleased this is included within the application as this reinforces the relationship between the core of the moated site and the mill pond, a surviving, albeit altered feature from Ightham's medieval landscape. We note the hedge on the north edge of the bridal way falls just within the boundary of the scheduled monument and depending on how this is removed scheduled monument consent may be required. We would be pleased to advise the applicant on this matter in due course.

Policy context and Historic England's position

The NPPF governs decision making for applications affecting the historic environment and notes that heritage assets "are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations" (Para 184).

In your Council's consideration of this application, Paragraph 190 which requires that harm is avoided or minimised to avoid conflict between the conservation of an asset and any aspect of a proposal and paragraph 194 which requires that harm should have clear and convincing justification, both apply.

Historic England engaged in detailed discussions about the least harmful location for rationalised car parking on the Ightham estate including the production of an options appraisal underpinned by a comprehensive assessment of setting and its contribution to significance. We are therefore satisfied that the proposed location represents the least harmful option to deliver the public benefits proposed, is possible within the constraints of the site and beyond as a whole and is workable for the trust within the brief they outlined. Pre-application discussions also focussed on how harm to heritage significance, arising from the visibility of the preferred location in key long views, might be mitigated to minimise the harm and Historic England is also satisfied that the proposed landscaping measures, once mature, will effectively screen the car park such that it will have little presence within the landscape. We therefore consider that the key objectives of paragraph 190 have been met.

In deciding whether the remaining level of harm, which Historic England considers is



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less than substantial, has clear and convincing justification, your Council will need to decide whether the public benefits of enhanced visitor parking justify the harm to heritage significance. Your Council will then need to weigh the harm against the public benefits (including heritage benefits) in the manner described in paragraph 196.

Specifically with respect to heritage benefits relevant to the weighing exercise, we think there are a number of substantive ones that are not possible unless the car park is relocated. Chief among these is the reinstatement of an ornamental garden in the current car park as this will once again reveal the extent and form of Ightham's ornamental landscaped setting and help interpret some of its productive elements and their role in the daily life of the estate. Reinstating the line of the North Drive enhances the arrival experience to the estate by revealing lost views between the drive and fields to its east and by fully illustrating once again one of two key medieval routeways to the house. This is also a significant heritage benefit in our view. Rationalising the way in which the site is accessed also provides wider benefits in the form of enhanced visitor movement throughout the paid area as the proposed changes help the Trust disperse visitors more widely across the paid area thus improving management of visitor movement through the house. Removing hedges from the south and north edge of the bridal way will also assist in interpreting the relationship between the moated house and south mill pond, a water feature with medieval origins.

In reaching a decision on this proposal your Council should also consider "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation" (para 192, a), the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality (para 192, b) and the desirability of new development making a positive contribution to local character and distinctiveness (para 192, c). You will also need to consider the impact of the proposed development on the significance of designated heritage here, noting that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be) (para 193).

Recommendation

Historic England has no objection to the applications on heritage grounds. In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas and section 85(1) of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural



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beauty of AONBs.

Your authority should take these representations into account in determining the applications. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decisions in due course.

Yours sincerely

Alice Brockway

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