

## DRAFT – Faversham Society Assessment of Harm

### 1. Introduction

1.1 The Faversham Society, assisted by Mr J Ray Harrison, AA Dipl; Dipl. Historic Building Studies IASS York, MIHBC, has undertaken a thorough review of application 20/500015/OUT - Land At Abbeyfields Faversham Kent ME13 8HS - Outline application for the development of up to 180 dwellings with associated infrastructure including internal access roads, footpaths, cycleways, parking, open space and landscaping, drainage, utilities and service infrastructure works (All matters reserved except Access) to undertake an assessment of harm posed to a number of heritage assets (including a Scheduled Monument and Conservation Area) by this application. This assessment has been undertaken in response to the assessments carried out by Swale BC's Conservation and Design Team and, indeed, the assessments carried out on behalf of the applicant.

1.2 The Society's assessment is that the application poses substantial harm to the significance of several designated heritage assets<sup>1</sup>, in particular:

- The site of St. Saviours Abbey ("Faversham Abbey"), including the remains of an Iron Age farmstead and Faversham Roman Villa. The site is a Scheduled Monument (List Entry Number: 1011804). A copy of the Official List Entry is appended as Annex A
- The Faversham Town Conservation Area (the "Conservation Area"). A copy of the map of the Conservation Area and the 2004 Appraisal are appended as Annex B
- "Abbey Farm" – comprising:
  - Faversham Abbey Major Barn (Grade II\* - List Entry 1344267)
  - Faversham Abbey Minor Barn (Grade I – List Entry 1060966).
  - Cartshed and Adjoining Shed (Grade II – List Entry 1261088)
  - Abbey Farmhouse (Grade II\* - List Entry 1060995)
  - Stables, about 30m East South East of Abbey Farmhouse (Grade II – List Entry 1240320)
  - Medieval Stables at Abbey Farm (Grade II\* - List Entry 1268252)

Copies of the Official List Entries listed above are appended as Annex C.

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<sup>1</sup> Defined in the Glossary of the NPPF (2021 edition) as being: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.*

- 1.3 The Conservation and Design Team, in their advice note of 27th February 2020 have listed a further number of listed buildings, situated further from the site. For this assessment, however, the Society has focused on the heritage assets listed above. This does not mean that the Society considers that the application poses no harm (or less than substantial harm) to those heritage assets.
- 1.4 In undertaking this assessment, the Society also passes comment on the chalk stream (Cooksditch) within the area, which is an important ecological feature within the locality of the site.

## **2. This Assessment**

- 2.1 Sets out relevant parts of the historical, archaeological, architectural and spatial history and assesses the character/significance of part of the north-east-side area of the Faversham Conservation Area from St Mary of Charity school in the south to Abbey Road/Abbey Farm in the north.
- 2.2 Examines the history of Abbey Fields, which is the agricultural east side setting of this part of the Conservation Area, its historical and spatial contribution to the character of the Conservation Area setting, and hence to the 'latter's character.
- 2.3 Considers the effect of residential development at Abbey Fields on the Conservation Area's surviving agricultural east-side setting and hence on the character of the Conservation Area.
- 2.4 Sets out the significance of the chalk streams in this area.

## **3. The Area Considered**

- 3.1 The area extends from St Mary of Charity School in the south, northwards to Abbey Farm. In the west, starting in the south west and moving north, it is bounded by part of Church Road, then the path from west of the Church past the Old Grammar School to Abbey Place, from there along the west edge of the Grammar School playing field to the line of Abbey Road leading east to Abbey Farm. Eastward the area extends to the roughly north-south running east-side Conservation Area boundary. All this forms the south part of a discrete north-eastern 'Character area' within the Conservation Area.

## **4. References**

- 4.1 Parts of the Statement are based on information in Swale's 2004 *Faversham Conservation Area Character Appraisal*, which includes valuable historical material and where this is made use of it is footnoted as: FCAA, 1.1, 1.2 etc.
- 4.2 Map references unless otherwise noted are to maps in the Appendix of Mr. Harrison's "*Abbey Farm Faversham, the topography of, and the survival of the evidence of monastic use within, the wider surroundings of the farmstead (Abbey Farm) from prior*

to the Reformation to c1900. February 2001". A copy of this document, in its entirety, is annexed as Annex D. Thus individual dated maps referred to in the text are referenced AP 4 to AP 21.

## 5. Historical Context

5.1 In considering the significance of the heritage assets, it is important to consider the historical context of the area local to the site.

### *The earlier town and Abbey Street.*

5.2 The former Royal Abbey of St Saviours (FCAA 2.1-2.20) was founded in 1147 where the north end of a low north/south running ridge (on which the current town stands) runs down to meet the Swale marshes. This has been said to be well to the north of the site of the earlier, Saxon, town of Faversham which is thought to have been established south west of the current town centre around the four roads that meet at St Andrew's Cross<sup>2</sup>. Tanner Street is said to have been the site of its earlier medieval Guildhall with the 'Abbot's Prison' opposite. The centre of the town was at some time moved to around the current Market Place - by c1350 the monks had built Abbey Street (called the 'New Town') from the new Market Place/Court Street north along the ridge to the main Abbey gatehouse, the entrance to the Abbey outer Precinct. Abbey Street is thus an example of medieval town planning with new house plots, intended no doubt for 'townsmen' rather than agriculturalists, leased and or sold along its length.

5.3 The early 17<sup>th</sup> century town map (AP3 see also AP14-15) is the first and earliest reliable map referred to here. It shows development along all the streets of the late medieval heart of the town. These remain the urban and residential heart of the Conservation Area today. It also shows some of these houses backing onto a large area of land east of Abbey Street and the town centre - i e the area under consideration here. The northern part of this area beyond the last houses and walls, is the Abbey Precinct site. On the early 17<sup>th</sup> century map the monastic buildings within the Precinct are shown already reduced to almost nothing, but the main buildings of the Abbey's former farmstead, still known as Abbey Farm, survived then and still do. The buildings, sites etc and the historic town setting of this area, between St Mary of Charity School and Abbey Farm, are now considered.

### *Abbey Farm*

5.4 The Abbey's home farm is at the north end of Area towards the east side of the Conservation Area. It stands just north of the line of the now lost north wall of the Abbey precinct which probably dog-legged around it to exclude it. The Precinct itself is now a levelled school playing field and Scheduled Ancient Monument Site. The foundation trenches and chalk footings of the Abbey Church and ancillary monastic buildings as well as parts of an Iron Age settlement and Roman villa lie beneath its

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<sup>2</sup> Wilkinson page 7, Wilkinson P *The Historical Development of the Port of Faversham 1580-1780*. BAR British Series 413 2006

surface.

- 5.5 The Abbey Farm building group and its access track retain their medieval form. The track runs east from the west end of Standard Road past Abbey Farm Farmhouse, through the farmstead and then on out into the fields to the east of the town. (Standard Road is immediately outside the former north wall of the Precinct.) The main farmyard abuts the south side of the farm track - again it retains its large-scale medieval plan. All this, including a tall yard area gateway and a few other buildings since lost, is shown in detail on the early 17<sup>th</sup> century map.
- 5.6 Great timber framed late medieval barns flank two sides of the yard. The Minor barn, though truncated, is of one build throughout and is dendro-dated to the early part of the 15<sup>th</sup> century with a last timber felling date of 1426. For this and for its consistently high standard of construction it is listed Grade I, meaning it is of “exceptional interest”. There is no higher Grade of listing, with Historic England stating that only 2.5% of listing buildings are at Grade I<sup>3</sup>, making it of national significance. The larger, 'Minor', barn is of two builds, its timbers with last felling dates of AD 1402-16 and 1475. It is listed Grade II\* rather than Grade I partly because of its two stage construction. A Grade II\* listing means that a building is of particular importance of more than special interest. According to Historic England, only 5.8% of listed buildings are Grade II\*<sup>4</sup>. This makes the Minor Barn of particular importance, certainly regionally, if not nationally. The surviving combination of two great medieval Monastic barns on the same site as here is very rare in Kent<sup>5</sup>.
- 5.7 North of the farm track, opposite the farmyard, stands part of a small medieval stable listed Grade II\*. Probably 15<sup>th</sup> century in date it is a very rare survivor indeed. To its west is a late 18<sup>th</sup>/early 19<sup>th</sup> century Grade II listed brick stable range and beyond this a 19<sup>th</sup> century timber framed former forge. A late 15<sup>th</sup> century predecessor of this forge probably stood in this same Abbey 'Nethercourt'. On the north east side of the farmyard, abutting the south side of the track is a small 19<sup>th</sup> century cart lodge and ancillary store listed Grade II. West beyond the forge is the farmhouse. There are within this elements of construction going back to the late c13<sup>th</sup> /early 14<sup>th</sup> century though it appears later in date externally. It is again listed Grade II\* for its special architectural/historic interest.
- 5.8 The farmstead group, still retaining its medieval layout, thus contains one Grade I, three Grade II\* and two Grade II listed buildings, all this marking it out overall as a site of very great historic and architectural interest/significance.
- 5.9 Current use means that the barns are at present maintained to acceptable levels. However, alarmingly, the Grade II\* stable is derelict and has been a '*threatened building*' for many years. As far as the Society is aware, no steps are being taken to deal with this issue.

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<sup>3</sup> <https://historicengland.org.uk/listing/what-is-designation/listed-buildings/#Categories>

<sup>4</sup> Ibid

<sup>5</sup> See Rigold, *Some major Kentish timber barns*, 1966.

5.10 The buildings of Abbey Farm along with the Parish Church and the Old Grammar School are the only ones of architectural significance within this part of the Character Area though there are various walls of some importance that also contribute to character. Neither the parish Church nor the Old Grammar School are examined further as unlike Abbey Farm they do not bear closely on the issue with which this part of the assessment is concerned.

#### *The Abbey Precinct and Cooksditch.*

5.11 The Abbey Precinct blocked-off the end of Abbey Street. Within it as noted stood important monastic buildings such as cloisters, refectory, dormitory, chapter house and kitchen and of course the great church. It was walled round in the usual way with inner and outer precincts again as usual and it extended west to close to the Creek. The outer wall was perhaps gone by the time of the early 17<sup>th</sup> century map but much of its extent was then and still is easily discernible. As noted it's northern limit was the east/west line of Abbey Road, with the probable detour south to exclude the two great barns at Abbey Farm and ending in the east at the north/south running Cooksditch (AP12). Its southern line was that of the current footpath going east out of Abbey Place.

5.12 The line of the Cooksditch stream - now rising close to the Whitstable Road and<sup>6</sup> flowing north past Abbey Farm - is clearly visible on the early 17<sup>th</sup> century map and appears on all subsequent maps (AP12). It is likely to have originally been artificially channelled by the monks. Forming the east boundary of the Precinct it serviced the Abbey and its pond (AP 17,18) and mill at Standard Quay to which a branch of it was certainly channelled. The Precinct's southern limit is preserved in the east/west running public footpath mentioned above (a line on the early 17<sup>th</sup> century map) between Abbey Place and the little bridge over the Cooksditch (titled elsewhere the '*shooting meadow stream*' AP23) to the east. This bridge is a very long-established crossing point to the fields east of the town. It appears on all subsequent maps and still exists - though painfully 'rebuilt to modern standards and with modern materials'.

#### *The Importance of Cooksditch as a Chalk Stream*

5.13 Cooksditch is recognised now as being important in its own right as a chalk stream flowing from the chalk aquifer of the North Downs into nearby Faversham Creek. Chalk streams are one of the planet's rarest habitats and most of them are found in England. Of the 260 or so true chalk streams on Earth, over 80% run through the English countryside. These streams emerge from underground chalk aquifers and typically flow over flinty gravel beds. This ensures their cleanliness but also endows them with dissolved iron and magnesium minerals. The main threats to chalk streams nationally, including to Cooksditch, are falling water levels (as the result of over-abstraction and climate change) and pollution in particular from overloaded and outmoded sewage and drainage systems.

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<sup>6</sup> <https://www.gov.uk/government/news/new-chalk-streams-strategy-launched-to-protect-england-s-rain-forests>

- 5.14 Chalk streams are recognised by the government and water companies as a high priority habitat for biodiversity conservation and habitat restoration. Most recently (October 2021) a number of Government Agencies (the Environment Agency, National England and Defra) have published in conjunction with water companies and other environmental organisations a strategy, setting out the future direction needed to protect and enhance England's chalk streams.
- 5.15 Cooksditch flows from one of a long series of springs that occur along the north Kent coast between Graveney and the Medway Estuary where the chalk of the North Downs meets the impermeable clay formations of the Thames Estuary. Another such spring – known locally as Clapgate – is situated to the east of the Abbey Fields site and feeds a second chalk stream that flows through a Local Biodiversity Site via Thorn Creek into Faversham Creek.
- 5.16 It is worth raising, at this point that the proposal would, in the Society's view, increase the number of houses immediately adjacent to two chalk streams (Cooksditch and Clapgate/Thorn Creek) and the Abbey Fields Local Biodiversity Site. The pressures already exerted on Cooksditch and Thorn Creek by water abstraction and periodic discharges of untreated sewage would be exacerbated by the additional ones associated with higher human population densities, including runoff into sensitive watercourses caused by over-fertilisation of the ground with nitrogen and phosphorus as a result of dog urine and faeces.

*The remaining lands west of the Cooksditch and behind Abbey Street.*

- 5.17 As late as 1842 (AP 7) the lands within this part of the Area from the Whitstable Road north to Abbey Road/ Abbey Farm remained largely a patchwork of small fields, as earlier maps suggest they always had been - though there was some straggling development by then from the parish Church along Church Road and east along Whitstable Rd. By 1897 (AP9) new secondary and infant schools had been built south of the churchyard and field divisions within the former Abbey Precinct had been removed. But otherwise all the open space within the area, which was still considerable, stood as before, essentially rural in usage and character.
- 5.18 The pre-19th century maps show a seamless relationship between the smaller fields at the back of Abbey Street and the larger ones east of the Cooksditch. The conjunction of larger and smaller scale landscape here ran south all the way to the Whitstable Road - it probably reflects an earlier, medieval, situation. Thus until the 19<sup>th</sup> century the character of these areas to east and west of the Cooksditch, other than the Precinct area at the north end, remained essentially rural. This was in contrast to the heavily urban character of the town centre streets close by.
- 5.19 In the mid 20<sup>th</sup> century the Grammar School moved to its current site between the Parish Church and the footpath marking the line of the south wall of the Abbey

Precinct. There is still a sense of generous open space in the large area of playing field east of the school buildings, extending up to the Cooksditch. And as noted yet more playing fields occupy the remaining open land to the north here (before, this was probably orchards) - i.e. the Scheduled Precinct site itself.

*Main features east of the Cooksditch - The 'Shuttinge Meade'/'great field' etc .*

5.20 From the little bridge across the Cooksditch the Precinct Wall footpath led east into Abbey Fields (or the 'Shuttinge Meade' in the early 17<sup>th</sup> century<sup>7</sup>) . Beyond the 'Shuttinge Meade' the early 17<sup>th</sup> century map shows the end of what may have been a 'great field' (it is named as such on one later map) - it is the precursor of the various large fields shown here on succeeding maps. Over time different field boundary arrangements existed within the Fields. *"In Kent, a striking contrast was evident between the small irregularly-shaped blocks of conjoined strips of the Weald and the larger, more rectangular, examples in east Kent."* This is one such example. To explain, the historic pattern of fields in Weald was small fields trending to the rectangular. In north and east Kent there were in places on both sides of the Downs some large fields within which individuals held specific land blocks. Abbey Fields may have been one such example.

5.21 The building of the railway line to Standard Quay in the 19<sup>th</sup> century cut off the old west end of the Field as it then was. Today this area, now inside the Conservation Area, is a separate cultivated field between Cooksditch and former railway line. The latter forms the east-side Conservation Area boundary here. This field abuts the east bank of the Cooksditch directly opposite the site of the east side of the former Abbey Precinct and extends north to Abbey Farm. It thus forms the immediate eastern setting of the Scheduled Faversham Abbey site and the immediate south east setting of Abbey Farm. From its south end modern housing stretches south to the Whitstable Road.

5.22 The early 17<sup>th</sup> century map, Jacob's map of 1754 (AP4), and the Tithe map (AP7) show what were large fields running all the way to the Whitstable Road on the east side of the Cooksditch here. Today extensive later 19<sup>th</sup> and 20<sup>th</sup> century residential estates sprawl north from the Whitstable Road in this area over what were once these fields. As things stand now most of this development stops in the north at the line of the south Precinct Wall footpath where this passes out eastward into the landscape.

5.23 The footpath line thus now represents the south boundary of what remains of Abbey Fields here. This extends west to the former railway line/Conservation Area boundary, and in the east one can see to the horizon where Blean Woods closes the view to the horizon and beyond. It was put back into agricultural use between the wars after brick-earth working. It shows today as an extensive gently undulating open arable landscape - as originally but with ground levels lowered. This large open field is all that is now left of what was once the all-embracing agricultural setting of the town<sup>8</sup> - see Jacob

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<sup>7</sup> 'Shuttinge Meade' was presumably the 'butts' for long-bow practice.)

<sup>8</sup> Standard Quay faces out over reclaimed marshland, not arable, landscape

and Tithe map. Today it forms the east side setting of this part of the Conservation Area, of the Scheduled Faversham Abbey site and Abbey Farm.<sup>9</sup>

## 6. Significance of the Heritage Assets

### *Faversham Abbey*

6.1 This is set out fully in Historic England's "Reasons for Designation" (see Annex A). In particular:

*"Faversham abbey is an example of a medieval royal foundation, with documentary records dating from its construction in the 12th century through to its dissolution in 1538. Partial excavations have revealed the impressive scale of the original plan for the church and claustral buildings, and the subsequent alterations made in the 13th century. Other unexcavated archaeological remains relating to ancillary buildings will survive in the area. An Iron Age enclosure and Roman villa are also known from partial excavation to occur within the area later defined as the abbey precinct. These will provide information relating to the early history of the site, and its development around the time of the Roman invasion."*

6.2 In respect of the locality, the former Abbey which played an important part in the economy of the town until the Dissolution. As set out in the 2004 Appraisal at FCAA 2/9:

*"...The abbey site remains, however, a site of remarkable historic significance and although most of the evidence is archaeological enough fragments still survive to provide a real and tangible link with the important medieval monastic foundation."*

### *Abbey Farm*

6.3 Abbey Farm is a rare example of a surviving Monastic farmstead retaining its route out to the east from the farmstead into the local agricultural landscape of Abbey Fields, which originally formed part of Abbey Farm.

6.4 Abbey Farm presents a rare combination on the same site of its part early medieval timber framed farmhouse of regional importance, later small medieval timber framed stable of national importance, two large later medieval timber framed barns, one of regional, the other of national, importance and its brick stables and timber wagon shed of local importance. It presents a rare example of the survival of a very large farmyard, medieval in origin, as well as the rare surviving combination of its two separate large late medieval barns forming an 'L' around two sides of the farmyard - a precursor of

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<sup>9</sup> Formerly the extant fields immediately north east of Abbey Farm also joined with the wider landscape to north and east but this is no longer the case. The introduction of the railway line and building of Chambers Dock AP10, 14, 15, have allowed the current close-in Abbey Farm field boundary here to be built up with boat-yard and houseboat uses.



similar layouts repeated throughout east Kent up until and into the 19<sup>th</sup> century.

- 6.5 It is also rare to see the survival of parts of the small historic fields close around it to the south east, north east, and north west. (The first is considered next, below. The other two are outside the north limit of this exercise and will be considered elsewhere.)

*The historic/spatial significance of the field within the Conservation Area between the Cooksditch and the Conservation Area boundary south east of Abbey Farm*

- 6.6 The field is the immediate eastern setting of the Scheduled Monument site of the Abbey Precincts that once contained the Abbey's monastic buildings. It is the immediate south eastern setting of Abbey Farm, showing at a very small scale the principle of the Farmstead's historic relationship to local agriculture, which sustained the adjoining Abbey and which the Farm buildings were built to service.
- 6.7 It was, at one time, the west end of an historic series of large fields extending away to the south east, of which the current, already reduced, Abbey Fields is now the sole survivor. It is also part of the site at one time of the town's 'Shuttinge Meade' or 'butts'.

*The historic/special significance of Abbey Fields*

- 6.9 Abbey Fields forms part of the much wider south eastern setting of Abbey Farm, showing it in its wider relationship to agriculture, which sustained the adjoining Abbey and which the Farm buildings were built to service. It is part of a series of large historic fields east of the Conservation Area that formerly extended south to Whitstable Road - and from there around the south part of Faversham and beyond - forming for many centuries the town's agricultural setting.
- 6.10 Abbey Fields is one of only two places<sup>10</sup> left in Faversham where the Conservation Area and some of its historic buildings and sites ( here Abbey Farm and the Abbey Precinct) relate to an original setting of open country, this facilitating understanding of the character of the pre-industrial town.

*Abbey Fields has further significance for its potential to enhance understanding of Abbey Farm and the former Abbey Precinct*

- 6.11 The historic physical/visual relationship of the Abbey Precinct Site/ the buildings of Abbey Farm and the still farmed open landscape eastward beyond them enables them to be 'read' - understood - from within that landscape, or vice versa. The understanding of the physical/visual relationship could be further facilitated and enhanced by cutting down the modern currently overgrown hedges along the former

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<sup>10</sup> The other is the recently overdeveloped/commercialised Standard Quay area

railway line.

## 7. Assessment

### *Substantial Harm*

7.1 In *R (oao Bedford Borough Council) v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin)* the Court held that in assessing whether or not substantial harm was posed to a heritage asset by a development the decision maker was looking to see if “...an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”. This is the approach that the Society has followed in this assessment.

*Assessment of the combined Conservation Area setting contribution of Abbey Fields and the field immediately south east of Abbey Farm (in the Conservation Area).*

7.2 This pattern of fields within and beyond the Conservation Area forms the Area’s eastern setting here. Abbey Fields is now the sole surviving example of medieval Faversham’s former intimate relationship with its ancient arable setting - the rest of the town’s historic medieval and post medieval core is embedded in various successive later ‘growth rings’. Put another way the penetration of still open country - the combination of Abbey Fields and the field south east of Abbey Farm - up to and into the Conservation Area allows us to experience a unique fragment of the town’s pre-industrial revolution setting.

7.3 The point is also made in respect of Abbey Farm and adjoining former Faversham Abbey Precinct, both bounded by the Cooksditch. The open lands in question remain in the same relationship to these important ecclesiastical sites as they did in the Middle Ages. Even the line of the old farmers’, and Abbot’s, route from Abbey farm east into the Abbey Fields survives.

7.4 The architecturally and historically nationally important Abbey Farm building group and farmhouse retains its historic relationship with the sweep of its remaining agricultural land (still significantly known as Abbey Fields almost 500 years after the Dissolution) extending from the farm east around to south.

7.5 The scale of this surviving landscape confirms the extensive nature of monastic agriculture, enhancing understanding of the farmstead group’s purpose. The two fields provide the farm buildings - most obviously the great Grade I and II\* barns - with a most appropriate wider actual and historic setting reflecting their importance both in their time and now. The barns are the last in what was certainly a line of predecessors stretching back into the history of the Abbey - the use of Abbey Fields for agriculture long pre-dates the building of the current examples.

7.9 The survival of these two adjoining fields as open space, one inside and the other outside the Conservation Area, is of great importance:

- i. as demonstrating the principle of the relationship of the Conservation Area's medieval and post medieval core with its surroundings, throughout a period extending from the Middle Ages to the mid-19<sup>th</sup> century.
- ii. as the last surviving example in the Conservation Area of this historic relationship between the town and the once surrounding fields that formed its original historic setting. By this, the Society means arable fields as opposed to what one sees from Standard Quay - reclaimed marsh grasslands.
- iii. as the extensive historic east-side landscape setting of the Abbey Precinct and Abbey Farm, in particular today providing the appropriate setting for, and making an invaluable contribution to an understanding of the historic role and functioning of, the largely intact medieval Abbey Farm building group.

7.10 The above factors confirm that the open space setting of the Conservation Area provided by the two adjoining fields, one inside and the other (Abbey Fields) outside the Conservation Area, makes a very important contribution to its character.

7.11 To allow the application would, in the Society's view, vitiate the significance of this combined heritage asset altogether or, if not, certainly would very much reduce it.

## **8. The Impact of The Proposed Development on Heritage**

### *Abbey Fields As A Non-Designated Heritage Asset*

8.1 In preparing this assessment, the Society's view is that the material presented in this assessment confirms that the field to the south east of Abbey Farm is a non-designated heritage asset by reason of its significant historic and visual contribution to the character of the Conservation Area and as the farm and abbey site historic setting. The Society's view is the same can be said for Abbey Fields itself.

8.2 Non-designated heritage assets are defined in the PPG at paragraphs 039-040 (Reference ID 18a-039-20190723 & 18a-039-20190723)<sup>11</sup>. For the factors set out in this assessment, the LPA is invited to consider whether or not Abbey Fields and the field to the south east of Abbey Farm should be identified as non-designated heritage assets and included in the Local Heritage Lists. The LPA is invited to consider Historic England's Advice Note 7 (Second Ed)<sup>12</sup>, and in particular Chapter 1.3<sup>13</sup>.

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<sup>11</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#non-designated>

<sup>12</sup> <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

<sup>13</sup> It is noted that para 7 on page 36 of Swale's adopted "A Heritage Strategy for Swale 2020-2032" confirms that Swale does not have a local list, however, this is not a reason for overlooking (and losing) the important contribution to local heritage that these fields present. It is noted (from the strategy and the

## *Impact*

8.3 Development within Abbey Fields would cause substantial harm to the Conservation Area's setting in that:

- i. it would interfere seriously with and change, the existing spatial characteristics of Abbey Fields, destroying its value as a Heritage Asset in its own right. This loss of the field would undermine its contribution to fully understanding the historic and spatial character of the town and Conservation Area.
- ii. it would eliminate the last possibility of experiencing on the ground an ancient continuity between the historic town/Abbey and the wider landscape now lost everywhere else in Faversham, negating the current contribution of Abbey Fields to an understanding of the historic character of the town, its hinterland and the Conservation Area.
- iii. in making the Conservation Area's east boundary the new limit of surviving east-side historic landscape - i.e. by reducing that landscape to just the field immediately south east of Abbey Farm - it would remove Abbey Fields from its role as the historic east-side setting of the Abbey Precinct, Abbey Farm and Conservation Area. This and the urbanisation of Abbey Fields would be detrimental to its contribution as Conservation Area setting, and thus damage the character of the Conservation Area.

8.4 All of this in the Society's view would constitute 'substantial harm' within the meaning of the NPPF and PPG to the local historic and spatial character of the Conservation Area and its setting including the Abbey Precinct site & Abbey Farm group - as well as to Abbey Fields itself. The effect of granting permission and, indeed allowing the envisaged development to come forward, would drain away, or very much reduce, the significance of the Conservation Area and its setting.

8.5 However, the Society appreciates that what amounts to 'substantial harm' is often seen by the decision maker and the Courts as being a high bar to meet (as per the PPG). Notwithstanding the Society's view that in the context of this site, that bar has been met, the Society appreciates that the Conservation and Design Team have determined that the proposal presents 'less than substantial harm' to the heritage assets. If this is maintained, then the LPA will need to undergo a balancing exercise weighing up the harm against the public benefits to be gained from the proposal.

## **9. Public Benefits**

9.1 The Society submits that there are no true public benefits arising from this proposal that are able to overcome the harm to the setting of heritage assets that the proposal

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Faversham Creek Neighbourhood Plan) that the LPA accepts the principle of non-designated heritage assets (referred to as "undesignated" heritage assets in the Faversham Creek Neighbourhood Plan).

presents.

- 9.2 It is worth noting that the site was examined for both the emerging Local Plan and the emerging Neighbourhood Plan it was rejected for housing in both appraisals.
- 9.3 The emerging Local Plan and the emerging Neighbourhood Plan are both growth-oriented, and this site is not required to meet the housing targets set by the Government, these are met elsewhere in and adjacent to Faversham
- 9.4 Further, the proposal presents significant negative impacts on the locality, as opposed to benefits. In summary:
- a) Despoliation of a valued green lung – very evident during the pandemic and in letters submitted by residents.
  - b) Creation of an “enclave” out of keeping with the character of the town. This “new suburb” will put significant strain on existing infrastructure and local amenity, to the detriment of existing residents. It will also present an ecologically damaging incursion into the open countryside, affecting the surrounding amenity through pollution (including noise and light) and most likely to be a development visible from afar into the countryside,
  - c) Th establishment of a residential community in an area accepted (in the SHLAA process) as being an area with poor access.

Closing off a valuable corridor into the open countryside from the centre of the Town. As identified by the Conservation and Design Team in their Advice Note – *“One of the charms and beauty of Faversham is the remaining distinctiveness of character which still survives between the historic built centre of Faversham from the creek and countryside area”*. Situating 180 houses here, will destroy both that charm and part of the fundamental character of Faversham forever.

- d) Complete destruction of the last evidence of the agricultural setting of the town and of the importance of the Abbey
  - e) Loss of valuable agricultural land in the BMV category at Grade 2 and Grade 3(a) quality.
- 9.5 In all, this outweighs considerably the public benefit to be gained from 180 houses, in addition to the adverse impact on heritage assets.

## **10. Conclusion**

- 10.1 The above analysis of the heritage assets adversely affected by the application demonstrates that were the proposal to come forward as a development, at this site, the impact of the loss of the open Abbey Fields would be to significant detriment of a

number of nationally, regionally and locally important historical sites and buildings. It is clear to the Society that, notwithstanding the high bar, the harm to the significance of the heritage assets discussed above is substantial by virtue of the impact of the development on their setting. Even if that is not accepted by the LPA, then clearly any impact (even that described as “negligible”) of less than substantial harm is sufficiently serious to outweigh the public benefits from the proposal.

10.2 The application should be refused permission.