



Heritage Statement in Advance of the 2019 Refurbishment at Ursuline College, 225 Canterbury Road, Westgate-on-Sea, Kent, CT8 8LX

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NGR: TR 31639 69530



Report for Bond Bryan Architects Limited for Gen2

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SWAT ARCHAEOLOGY

Swale and Thames Archaeological Survey Company

School Farm Oast, Graveney Road

Faversham, Kent ME13 8UP

Tel; 01795 532548 or 07885 700 112

www.swatarchaeology.co.uk

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Summary

SWAT Archaeology has been commissioned by Bond Bryan Architects Limited to prepare a Heritage Statement relating to the proposed refurbishment at Ursuline College, 225 Canterbury Road, Westgate-on-Sea, Kent. There is a requirement under the National Planning Policy Framework (NPPF) for the client to explain the significance of any particular designated heritage assets that have been identified in the vicinity of the study site and demonstrate any potential impacts that a proposal will have upon their significance.

This report shows that the PDA lies close to two Grade II Listed Heritage Assets, one of which is located within the wider Proposed Development Area (PDA) being that of Hatton House. In addition, there are a number of other buildings that fall within the curtilage of Hatton House. Little Brescia and The Lodge in the area of the proposed development. The proposed development concerns the demolition of the detached house of Little Brescia and the current terrapin modular classroom of St Cecilia to be replaced by a new single storey three room classroom also called St Cecilia.

This report demonstrates that the significance of Hatton House resides in its architectural and historical interest. The Lodge, being contemporary with the house dating to 1886, also has architectural and historical interest, which for both buildings form their primary significance. Continuing development of the school within the PDA area for Hatton House since the early 20th century, has eroded the setting of this Heritage Asset and those within its curtilage. Especially for The Lodge which is situated immediately adjacent to St Cecilia and detracts from its setting.

For Little Brescia, this also falls within the curtilage of Hatton House. However, it was built later than The Lodge and Hatton House as a small house originally for the chaplain being it only historical interest. As a modern detached house, it has no architectural merit and as such is of very low significance, which does not preclude its demolition. The proposed development for the demolition of Little Brescia and St Cecilia to be replaced by a 3-classroom single storey building is considered to have a minor magnitude of impact on the setting of Hatton House and The Lodge. The current structures to be demolished are in poor condition and detract from the setting and street scene. As such the proposed changes are considered to have a neutral/slight but beneficial magnitude of effect to the setting of Hatton House and The Lodge and the impact on the significance of these heritage assets would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.

As well as overall improvements to the setting of the designated and on-designated heritage asset, the public benefit in providing three new classrooms in a modern purpose-built building is considered significant and will far outweigh and potential harm caused and allows for the optimum use for the school of areas not currently utilised to their full potential.

1 INTRODUCTION

1.1 Project Background

1.1.1 Swale & Thames Survey Company (SWAT) was commissioned by Bond Bryan Architects Limited for Gen2 (the 'Client'), to carry out a Heritage Statement relating to the demolition of Little Brescia House and the existing modular terrapin classroom building called St Cecilia to be replaced by a proposed new single storey brick and render classroom at Ursuline College, Westgate-on-Sea, Kent, centred on National Grid Reference (NGR) TR 31639 69530 (Fig. 2). As such this land within the school will henceforth be known as the 'proposed development area' (PDA).

1.1.2 This document will be used in support of planning applications associated with the proposed development.

1.2 The Site

1.2.1 The proposed site sits at an average height of circa 20m aOD. The land to the north of the PDA gently slopes until it reaches the tidal bay on Westgate. To the south of the PDA, the land gently rises up to circa 32m aOD towards the central plateau area of the Isle of Thanet. The school is situated on the southern side of Canterbury Road, a dual lane highway between Birchington and Margate. Margate is circa 2 ¼ miles east, north east. Westgate is half a mile to the north east and Birchington is one mile east, south east. Westgate is located in north east Kent on the coast of the Thames Estuary. The town is built beside the two sandy bays of St Mildred's Bay and Westgate Bay, which both have a sea wall and groynes to prevent coastal flooding. Chalk cliffs are present in between the bays and either side of the bays (Fig. 2).

1.2.2 The Site historically sat within the parish of Acol and is now within the administrative area of the Thanet District Council. The PDA encompasses c 4.25 hectares. The Site is located within an area which originally was arable belonging to Hundred Farm in the late medieval period, before a private residence was built on the land in 1886. In 1904 the house was purchased by the Ursuline Convent, but since, some of the buildings and land used by Ursuline College have been leased to the college by the Convent. Across the centre of the PDA is the Lourdes Nursing Home for Ursuline Sisters. This was built to the east of the southern end on the 1930s extension of Block C in the 1980s. West of the nursing home is also a number of private housing used by the Brescia Community for Ursuline Sisters. These parts of the site were not accessible,

although a path for the school traverses between these buildings to allow access to the southern area of the PDA.

1.2.3 Ursuline School comprises of a number of buildings of 19th, 20th and 21st century in date. The earliest is Hatton House, originally a private residence built in 1886 and is contemporary that of The Lodge, the gatehouse to the private residence. The estate was purchased by the convent in 1904. Since then the main teaching block, being Block C was built in 1907, along with Little Brescia, following by more extensions and buildings in the 1930s including a chapel, 1950s, a classroom in the 1960s, 2000 and 2006. The school buildings are mainly surrounded by hardstanding with playing fields and multi-use games area to the south, tennis courts, parking and paths. Some of the more recent buildings appear to have been built into the slope of the site. Figure 4 provides a pictorial phasing of the buildings in the PDA.

1.2.4 It has been identified that within the PDA is a designated heritage asset; the Grade II listed building of Hatton House along with a number of other buildings that reside in the curtilage of Hatton House.

1.3 Project Constraints

1.3.1 No constraints were associated with this project.

1.4 Scope of Document

1.4.1 This assessment was requested by the Client in order to determine, as far as is possible, the nature, extent and significance of the development affecting the settings of designated heritage assets. The assessment forms part of the NPPF requirement and is intended to inform and assist with decisions regarding heritage assets and is to be used in the support of planning applications associated with the proposed development.

2 PLANNING BACKGROUND

2.1 Introduction

2.1.1 National legislation and guidance relating to the protection of, and proposed development on or near, important archaeological sites or Heritage Assets within planning regulations is defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system.

2.1.2 The National Planning Policy Framework (NPPF), was updated in July 2018, revised in 2019 and is the principal document which sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework in which Local Planning Authorities can produce their own distinctive Local Plans to reflect the needs own their communities.

2.2 Heritage Assets

2.2.1 Designated heritage assets are defined in NPPF Annex 2 as:

'World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas designated under the relevant legislation.'

2.2.2 Designation is a formal acknowledgement of a building, monument or site's significance, intended to make sure that the character of the asset in question is protected through the planning system and to enable it to be passed on to future generations.

2.2.3 Statutory protection is provided to certain classes of designated heritage assets under the following legislation:

- Planning (Listed Buildings and Conservation Areas) Act 1990;
- Ancient Monuments and Archaeological Areas Act 1979; and
- Protection of Wrecks Act 1973

2.3 National Planning Policy Framework (NPPF)

2.3.1 The Historic Environment, as defined in the National Planning Policy Framework (NPPF 2019): Annex 2, comprises:

‘all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.’

2.3.2 NPPF Annex 2 defines a Heritage Asset as:

‘a building monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)’.

2.3.3 NPPF Section 16: Conserving and enhancing the historic environment sets out the principal national guidance on the importance, management and safeguarding of heritage assets within the planning process. The aim of NPPF Section 16 is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

2.3.4 Paragraph 185 of the NPPF states that:

‘Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. The planning authorities should take into account:

- a. The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b. The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c. The desirability of new development making a positive contribution to local character and distinctiveness; and

- d. Opportunities to draw on the contribution made by the historic environment to the character of a place.'

2.3.5 Paragraph 189 of the NPPF states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

2.3.6 Paragraph 190 of the NPPF states that:

'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account to the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'

2.3.7 The NPPF, Section 16, therefore provides the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. It is noted within this, that heritage assets should be conserved in a manner appropriate to their significance.

2.3.8 The NPPF further provides definitions of terms which relate to the historic environment in order to clarify the policy guidance given. For the purposes of this report, the following are important to note:

- **Significance.** The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage

asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

- **Setting.** 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.

2.3.9 The NPPF advises local authorities to take into account the following points in paragraph 192 when drawing up strategies for the conservation and enjoyment of the historic environment;

a) The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;

b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;

c) The desirability of new development in making a positive contribution to local character and distinctiveness.

2.3.10 Paragraphs 193 and 198 consider the impact of a proposed development upon the significance of a heritage asset.

2.3.11 Paragraph 193 emphasises that when a new development is proposed, great weight should be given to the asset's conservation (and that the more important the asset, the greater this weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

2.3.12 Paragraph 194 notes that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

2.3.13 Paragraph 195 states that where a proposed development will lead to substantial harm (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. The nature of the heritage asset prevents all reasonable uses of the site; and
- b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c. Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. The harm or loss is outweighed by the benefit of bringing the site back into use.

2.3.14 Conversely, paragraph 196 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

2.3.15 The NPPF comments in paragraph 201, that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

- 2.3.16 Paragraph 198 states that LPAs should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 2.3.17 Paragraph 200 encourages LPAs to look for new development opportunities within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 2.3.18 Any LPA based on paragraph 202, should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Curtilage

- 2.3.19 Historic England defines curtilage for the purposes of the listed building legislation, as an area of land around a listed building within which other buildings pre-dating July 1948 may potentially be considered listed. Not all buildings will have a curtilage. With those that do there will be cases where the extent of the curtilage will be clear (such as a garden boundary) but in others it may not be as clear each case will always be a question of fact and degree. A decision taker may take the following factors into account in assessing the matter: i) the physical layout of the listed building and the building; ii) their ownership past and present; and their use or function past and present specifically whether the building was ancillary (i.e. subordinate to and dependent on) the purposes of the listed building at the date of listing.

2.4 Planning Policy Guidance

Conservation Principles, Policy and Guidance (Historic England, 2008)

- 2.4.1 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment. The Conservation Principles, Policies and Guidance are primarily intended to help us to ensure consistency of approach in carrying out our role as the Government's statutory advisor on the historic environment in England. Specifically, they make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process.

2.4.2 The document explains its relationship to other policy documents in existence at that time, including Planning Policy Statement 1: Delivering Sustainable Development (2005), which includes the explicit objective of 'protecting and enhancing the natural and historic environment' In this document, Heritage England provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance note (PPG) 15 Planning and the Historic Environment (1994) and PPG16 Archaeology and Planning (1990) those general principles which are applicable to the historic environment as a whole. PPG15 and PPG16 was replaced by the NPPF in November 2012.

2.4.3 The policy document provides details about a range of Heritage Values, which enable the significance of assets to be established systematically, with the four main 'heritage values' being:

- **Evidential value.** This derives from the potential of a place to yield evidence about past human activity. Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them especially in the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past.
- **Historical Value.** This derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. Association with a notable family, person, event, or movement gives historical value a particular resonance.
- **Aesthetic value.** This derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.

- **Communal value.** This derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values but tend to have additional and specific aspects. These can be commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it or have emotional links to it. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place.

Historic Environment Good Practice in Planning Notes

2.4.4 In March 2015, Heritage England produced three Good Practice Advice in Planning (GPA) notes. The notes provided information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). GPA1 covered 'The Historic Environment in Local Plans'. GPA2 provided advice on 'Managing Significance in Decision-Taking in the Historic Environment' and GPA3 covered 'The Setting of Heritage Assets'. As at March 2017, GPA4 entitled 'Enabling Development and Heritage Assets' was still in draft.

GPA2: Managing Significance in Decision-Taking in the Historic Environment.

2.4.5 The guidance focuses on understanding the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. The document sets out a number of stages to follow:

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance

- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected

2.4.6 Since heritage assets may be affected by direct physical change or by change in their setting. It is important to be able properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process to assist with any planning decision-making in line with legal requirements.

GPA3: The Setting of Heritage Assets.

2.4.7 This document emphasises that the information required in support of applications for planning permission and listed building consents should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets.

2.4.8 The NPPF makes it clear that the setting of a heritage asset is 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.

2.4.9 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, including a variety of views of, across, or including that asset, and views of the surroundings from or through the asset, and may intersect with, and incorporate the settings of numerous heritage assets.

2.4.10 It covers areas such as cumulative change, where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Change over time and understanding any history of change will help to determine how further

development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset.

2.4.11 The implications of development affecting the setting of heritage assets to be considered on a case-by-case basis and since conservation decisions are based on the nature, extent and level of a heritage asset's significance, Historic England recommends the following broad approach to assessment, undertaken as a series of steps:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s).
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance.
- Step 4: Explore the way to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

2.4.12 The guidance reiterates the NPPF in stating that where developments affecting the setting results in 'substantial' harm to significance, this harm can only be justified if the developments delivers substantial public benefit and that there is no other alternative (i.e. redesign or relocation).

2.4.13 Historic England has also published three core Advice Notes, which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; 'Historic England Advice Note 1: Understanding Place: Conservation Area Designation, Appraisal and Management' (25th February 2016), 'Historic England Advice Note 2: Making Changes to Heritage Assets' (25th February 2016) and 'Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015).

2.5 Local Policy

2.5.1 The Local Planning Authority for the study is Thanet District Council.

2.5.2 Thanet District Council has a Local Plan from 2015 that covers up to 2031, which was adopted in July 2020. The local plan has a number of policies relevant to archaeology:

- POLICY SP36: Conservation and Enhancement of Thanet's Historic Environment
- POLICY HE01: Archaeology
- POLICY HE02: Development in Conservation Areas
- POLICY HE03: Local Heritage Assets

2.5.3 These policies are covered in turn in more detail below:

POLICY SP36: Conservation and Enhancement of Thanet's Historic Environment.

2.5.4 The Council will support, value and have regard to the significance of Heritage Assets by:

- 1) protecting the historic environment from inappropriate development,
- 2) encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building,
- 3) requiring the provision of information describing the significance of any heritage asset affected and the impact of the proposed development on this significance;
- 4) facilitating the review of Conservation Areas and the opportunities for new designations,
- 5) recognising other local assets through Local Lists,
- 6) offering help, advice and information about the historic environment by providing guidance to stakeholders, producing new guidance leaflets, reviewing existing guidance leaflets and promoting events which make the historic environment accessible to all,
- 7) agreeing Article 4 Directions which will be introduced and reviewed as appropriate,

8) supporting development that is of high-quality design and supports sustainable development.

POLICY HE01: Archaeology

- 2.5.5 The Council will promote the identification, recording, protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through management and interpretation
- 2.5.6 Developers should submit information with the planning application that allows an assessment of the impact of the proposal on the significance of the heritage asset. Where appropriate the Council may require the developer to provide additional information in the form of a desk-based or field assessment. Planning permission will be refused without adequate assessment of the archaeological implications of the proposal.
- 2.5.7 Development proposals adversely affecting the integrity or setting of Scheduled Monuments or other heritage assets of comparable significance will normally be refused.
- 2.5.8 Where the case for development which would affect an archaeological site is accepted by the Council, preservation in situ of archaeological remains will normally be sought. Where this is not possible or not justified, appropriate provision for investigation and recording will be required. The fieldwork should define:
- 1) The character, significance, extent and condition of any archaeological deposits or structures within the application site;
 - 2) The likely impact of the proposed development on these features;
 - 3) The means of mitigating the effect of the proposed development.
- 2.5.9 Recording should be carried out by an appropriately qualified archaeologist or archaeological contractor and may take place in advance of and during development. No work shall take place until a specification for the archaeological work has been submitted and approved by the Council. Arrangements must also be in place for any necessary post-excavation assessment, analysis and publication of the results, and deposition of the archive in a suitable, accessible repository.

POLICY HE02: Development in Conservation areas

2.5.10 Within conservation areas, development proposals which preserve or enhance the character or appearance of the area, and accord with other relevant policies of this Plan, will be permitted, provided that:

2.5.11 Proposals for New Buildings

1) They respond sympathetically to the historic settlement pattern, plot sizes and plot widths, open spaces, streetscape, trees and landscape features;

2) they respond sympathetically to their setting, context and the wider townscape, including views into and out of conservation areas;

3) the proportions of features and design details should relate well to each other and to adjoining buildings;

4) walls, gates and fences are, as far as possible, of a kind traditionally used in the locality;

5) conserve or enhance the significance of all heritage assets, their setting and the wider townscape, including views into and out of conservation areas;

6) demonstrate a clear understanding of the significance of heritage assets and of their wider context.

2.5.12 New development which would detract from the immediate or wider landscape setting of any part of a conservation area will not be permitted.

POLICY HE03: Local Heritage Assets

2.5.13 The Council supports the retention of local heritage assets, including buildings, structures, features and gardens of local interest. Local Heritage assets will be identified in a Local List as part of the Heritage Strategy. Once adopted where permission is required, proposals will be permitted where they retain the significance, appearance, local distinctiveness, character or setting of a local heritage asset.

3 AIMS AND OBJECTIVES

3.1 Introduction

3.1.1 This Built Heritage Statement was commissioned by Bond Bryan Architects Limited, which will be submitted with any future planning application. This assessment has been prepared in accordance with guidelines set out by the Chartered Institute for Archaeologists (see below).

3.2 Heritage Asset Assessment – Chartered Institute for Archaeologists (2017)

3.2.1 This heritage asset study has been produced in line with archaeological standards, as defined by the Chartered Institute for Archaeologists (2014,). A desktop, or desk-based assessment, is defined as being:

‘Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.’

(2017:4)

3.2.2 The purpose of the Heritage Asset report is, therefore, an assessment that provides a contextual archaeological record, in order to provide:

- *an assessment of the potential for heritage assets to survive within the area of study*
- *an assessment of the significance of the known or predicted heritage assets considering, in England, their archaeological, historic, architectural and artistic interests*
- *strategies for further evaluation whether or not intrusive, where the nature, extent or significance of the resource is not sufficiently well defined*

- *an assessment of the impact of proposed development or other land use changes on the significance of the heritage assets and their settings*
- *strategies to conserve the significance of heritage assets, and their settings*
- *design strategies to ensure new development makes a positive contribution to the character and local distinctiveness of the historic environment and local place-shaping*
- *proposals for further archaeological investigation within a programme of research, whether undertaken in response to a threat or not.*

CIfA (2017:4)

4 METHODOLOGY

4.1 Introduction

4.1.1 The methodology employed during this assessment has been based upon relevant professional guidance including the Chartered Institute for Archaeologists' *Standard and guidance for historic environment desk-based assessment* (CIfA, 2017).

4.2 Designated Heritage Assets

4.2.1 There are a number of criteria to address and they include the impact of the proposed development on the significance of the Heritage Assets.

Heritage Assets

4.2.2 Any Heritage Asset which includes a World Heritage Site, Scheduled Monument, Listed Building, Wreck, Registered Park or Garden, Conservation Area or Landscape can be identified as having a degree of significance meriting consideration in planning decisions. Heritage Assets are the valued components of the historic environment and will include designated Heritage Assets as well as assets identified by the Local Planning Authority during the process of decision making or through the plan making process.

Setting

4.2.3 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 or may affect the ability to appreciate that significance or may be neutral.

Significance

4.2.4 The value of a Heritage Asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance may be informed by a number of factors which may include; assessment of the significance of the site, setting and building, where relevant, under a number of headings:

- Historic significance – the age and history of the asset, its development over time, the strength of its tie to a particular architectural period, the layout of a site, the plan form

of a building, internal features of special character including chimneystacks and fireplaces,

- Cultural significance – the role a site plays in an historic setting, village, town or landscape context, the use of a building perhaps tied to a local industry or agriculture, social connections of an original architect or owner,
- Aesthetic/architectural significance – the visual qualities and characteristics of the asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric special features of interest,
- Archaeological significance – evolution of the asset, phases of development over different periods, important features, evidence in building fabric, potential for below ground remains.

4.3 Sources

4.3.1 A number of publicly accessible sources were consulted prior to the preparation of this document.

Archaeological databases

4.3.2 Although it is recognised that national databases are an appropriate resource for this particular type of assessment, the local Historic Environmental Record held at Kent County Council (KHER) contains sufficient data to provide an accurate insight into catalogued sites and finds within both the proposed development area and the surrounding landscape.

4.3.3 The National Heritage List for England (NHLE), which is the only official and up to date database of all nationally designated heritage assets.

Cartographic and Pictorial Documents

4.3.4 A full map regression exercise has been incorporated within this assessment. Research was carried out using resources offered by the Kent County Council, the internet, Ordnance Survey and the Kent Archaeological Society. A full listing of bibliographic and cartographic documents used in this study is provided in Section 9.

Aerial photographs

4.3.5 The study of the collection of aerial photographs held by Google Earth was undertaken (Plates 1-8).

Secondary and Statutory Resources

4.3.6 Secondary and statutory sources, such as regional and periodic archaeological studies, archaeological reports associated with development control, landscape studies, dissertations and research frameworks are considered appropriate to this type of study and have been included within this assessment.

DMRB Methodology

4.3.7 A full assessment of the effects of the Proposed Development has been made in accordance with the DMRB guidelines, Volume II, Section 3, Part 2, LA106 issued by the Highways Agency (2019). Each heritage asset will receive a significance value based on their importance, which is then evaluated as a function of the magnitude of impact on the heritage resource by the proposed development. See Section 10.2. for the relevant values. A matrix of the two values determines an assessment of the magnitude of effect.

4.4 Walkover Survey

4.4.1 The walkover survey is for the purpose of:

- Identifying any historic landscape features not shown on maps.
- Conducting a rapid survey for archaeological features.
- Making a note of any surface scatters of archaeological material.
- Constraints or areas of disturbance that may affect archaeological investigation.
- Consider the potential impacts of the development on the listed buildings within the area.

5 ARCHAEOLOGICAL AND HISTORIC APPRAISAL

5.1 Archaeological and Historical Narrative

- 5.1.1 The Isle of Thanet has been occupied since prehistoric times. The evidence of early hunter gatherer peoples on Thanet which can be seen in the Pleistocene deposits of the island particularly at Pegwell Bay and Manston. The periglacial processes had a scouring effect removing evidence of the oldest deposits of geological material and evidence of human settlement during the Palaeolithic and Mesolithic period, thus Thanet has fewer finds than seen elsewhere in Kent for this period.
- 5.1.2 During the Mesolithic period the coastlines of Thanet would have been different to the present-day coastline as the water levels were lower. It is thought that Thanet would not have been an island at this point. By the Bronze Age it is thought that the waters had rose enough to form an island but that there was still land to the north and east of the present coastline.
- 5.1.3 The Neolithic period of Thanet is dominated by the rising sea level, which would have altered the geography of the region and affected local resources. Evidence on Thanet of the Neolithic period and Bronze Age period is seen through the funerary landscapes along with evidence of worked flint tools. Major monuments include the causewayed enclosures at Chalk Hill, Pegwell, North Foreland and the remains of late Neolithic and Bronze Age barrows, some with burials, along with extensive landscapes of the settlements, farmsteads, trackways and agricultural lands. During the Bronze Age it appeared people favoured the promontories and highest elevations for the location of barrows of which there are hundreds across Thanet and Westgate being a suitable site as confirmed by a hoard of Bronze Age axes were found according to local historian John Lewis in 1736.
- 5.1.4 By the Iron Age in the sixth century BC, the coastline was formed of tall cliffs that were impassable except in deep valley intersections. Margate and Ramsgate were broad bays with smaller bays along the north and east coastline such as at Westgate and St Mildred's Bay, that would have allowed access for fishing boats. The earliest Iron Age features date to the fifth century BC and comprise of defensive settlements at North Foreland, Trinity Square, Margate and South Dumpton Down replacing the earlier Bronze Age landscapes. Evidence of the Iron Age has been found at nearby St Mildred's Bay but it is thought that the rate of cliff erosion in this area would have

precluded them for forming large permanent settlements. This period coincides with an increase in trade and exchange especially with continental Europe evidenced by the finds of coins and continental as well as local pottery. There is also an increase in the presence of burials. There is evidence for the storage of grain in pits during this period.

- 5.1.5 The Roman army invaded Britain in 43 AD, at is possible that they landed at nearby Richborough and Ebbsfleet. The Romans created major Kentish ports at Richborough, Dover and Lymne and therefore Kent was of considerable strategic importance. Roman villas have been found across Thanet and in common with elsewhere in Kent, many of these building went out of use around 300 AD but by the 4th century the Roman civilization was in decline and the Romans abandoned Britain in 410AD. A Roman villa was found at the cliff top at Westgate in 1870 during building works of a hotel. Place names indicate their origins. Such as Street, which was a hamlet very close to Westgate but has since been absorbed into the town indicates routes used in Roman times and were also utilised by the Anglo-Saxons.
- 5.1.6 The earliest known reference to the Wantsum Channel is in the second century AD geography of Ptolomy that confirms the channel was large enough to isolate Thanet during the Roman period and it is during this period that the coastline on the northern and eastern side begins to resemble that of the present day. Bede's Ecclesiastical History written in the 8th century in the Anglo-Saxon period refer to the channel as 'Uantsumu' and that there are 600 families divided from the land by the river Wantsum that is fordable only in two places. The Wantsum appears to have been at its deepest in the Roman and Anglo-Saxon period.
- 5.1.7 In the late 4th century, the Jutes arrived, a Germanic people that settled in Britain in the late 4th century. The arrival of the Anglo-Saxons is celebrated in Thanet through the tradition of the arrival of Hengist and Horsa in 449 AD at Ebbsfleet near Cliffsend. Remains of the new settlers can be seen in the cemeteries that can be found throughout the island and the occasional evidence of dispersed settlement that has been found. In 597 AD the Pope sent Augustine with a group of monks to Kent to convert the population to Christianity. King Ethelbert the King of Kent, married to a Christian woman, gave little opposition and in 598 AD Augustine and his monks built a church outside the city walls in Canterbury. Land was also granted in Thanet to build

a monastery on an estate at Minster on the Isle of Thanet. Anglo-Saxon activity has been evidenced in the Westgate area by pits, ditches and gullies.

- 5.1.8 Thanet's proximity to the coast and its monastic estate made it a target for Viking raids. Thanet was invaded by Vikings in 830 AD and 980 AD with more raids in the following three decades. The original monastery at Minster disappears from the records in the ninth century, possibly burnt by the Vikings. At the time of the Domesday book in 1086 AD following William of Normandy's invasion in 1066 AD of England, only Monckton and Minster were recorded as manors on Thanet. Monckton had 89 villagers, 21 smallholders with a mill and two churches. Minster had 150 villagers, with 50 smallholders, church, salt house, fisheries and a mill.
- 5.1.9 Westgate-on-Sea comes from the Old English 'geat' meaning 'gate, gap'. The prefix 'west' distinguishes it from the adjacent Margate. It was the railway company that added the suffix 'on-sea'. St Mildred's Bay is named after Mildrith, Thanet's patron saint and an Abbess of Minster. However, it was originally called Marsh Bay. There was a Westgate Manor, which was located in the area in medieval times. Hasted in 1800 described Westgate as 'a small hamlet of houses; from which place Domneva's deer is said to have begun its course across this island, running for some space eastward, till it turned southward towards the boundary of it, at Sheriffs Hope, in Minster'. Essentially the area was a farming community.
- 5.1.10 Westgate is an ancient manor. Hasted, writes that 'The manor of Westgate, alias Garling.....Robert de Westgate held it in the reigns of king Henry III. and Edward I. of the abbot of St. Augustine's, by knight's service'. Ownership of the manor passing a number of people until it was obtained by Henry VIII at the dissolution. King Henry passed it to Sir Thomas Moyle before it has a number of different owners for the next few centuries.
- 5.1.11 In 1791, a coastguard station and a few houses for the crew and were located by St Mildred's Bay. By 1863, the London, Chatham and Dover Railway reached Margate, with stations at nearby Birchington and Margate. At this time three farms made up the Westgate-on Sea Estate: Street Green Farm; secondly Westgate Farm located to the north between the coast and the railway line; thirdly Hundred Farm, located at the site of the PDA. The Westgate-on Sea Estate had been acquired by Herman Dirs Mertens of Street Lodge. In 1870 Mertens sold the Estate to William Corbett and

Alexander McClymont who were London developers. They created a private estate and plots of land were sold freehold at auction. The estate owners were required to maintain the roads, promenades, drainage, sewage, and gas supply. Rates were paid by the property owners to the Estate owners.

- 5.1.12 By 1871, Westgate-on-Sea station opened in response to the development occurring in the area. The Estate changed hands a number of times between 1870 and 1884, when it ran into financial difficulties, with the owners absconding and was repossessed by Coutts Bank during 1884-1933, with the bank disposing of the Estate between 1919 and 1933.
- 5.1.13 In 1884-1886, the parish church and Christ Church Congregational church were built along with St. Saviour's National School, and the Boy's preparatory schools, St Michael's and Wellington House. In 1886, 26 acres of the Streete Court Estate were sold, although the mansion and "pleasure grounds" remained. These 26 acres were bought by the Kent and Sussex Land Society, roads laid out in a grid pattern and plots sold off to builders and developers. In 1894 Streete Court mansion became a boys' prep school.
- 5.1.14 Hatton House was built as a private residence for William Jarret in 1886 as a retirement home, having been a solicitor that worked in relation to mortgages in respect of the Westgate Estate. Part of Hundred Farm was conveyed to him. The House also had a lodge, stables and coach house built. William Jarrett died in 1906, aged 86 and the contents of the house auctioned. The auction sale states that the house had 10 bedrooms, a dressing room, two bathrooms, dining and drawing rooms, a library, square hall, boudoir and card room. Also, there were three greenhouses, paddock, two lawns and a kitchen garden. The stables had room above as living quarters.
- 5.1.15 During World War I, St Mildred's Bay became the home of the Royal Navy Air Service using seaplanes. This was the forerunner of RAF Manston, which opened in 1916 as the St Mildred's Bay area was found to be unsuitable for night flying.
- 5.1.16 In World War II, Thanet was a restricted area. The large houses, hotels and boarding schools were commandeered by the military. The large houses, hotels and boarding schools were commandeered by the military.

5.1.17 Ursula was a medieval saint, regarded as the patron of education. St Angela was living in Brescia, Italy in 1535 and founded the Company of St Ursula. The Ursuline School started in 1904 as a girl's boarding school in nearby Adrian Square, when a group of refugees being Ursuline Sisters, fled Boulogne, France with a number of their pupils. The Boulogne School have been founded in 1624. In 1906, the convent took purchased Hatton House and in 1907 the local paper reported that the foundation stone of the new convent had been laid in the grounds of Hatton House. Hatton House was also extended at this time and a detached house built for the chaplain thought to be Little Brescia. In the 1930s, an assembly hall with classrooms above was built and an extension to the convent wing including a refectory and novitiate building and chapel erected. In the 1950s, the conservatory which originally housed the library, was replaced by an extension and a laboratory and two classrooms built on the site of the old chapel. In the 1960s a three-storey building containing a gymnasium and classrooms was built. In addition, a modular terrapin classroom was located in between The Lodge and Little Brescia. These types of buildings were provided as a prefabricated one-storey building usually of a wooden frame that was low cost. Later the school accepted day pupils and in 1995, the school became co-educational. The school is currently made up of four buildings, the main building of Hatton House, Block C, known as the 'Convent' building, Block B known as St Ursula's, and the sports hall.

5.2 Historical Map Progression

Andrews, Dury and Herbert map of 1769

5.2.1 Andrews, Dury and Herbert published their atlas some thirty years before the Ordnance Survey, immediately becoming the best large-scale maps of the county. This shows a sparsely populated landscape in the Westgate area. To the west is the village of Birchington and to the east is the tiny hamlet of Westgate Street and Dandelion, a corruption of the Dent-de-lion name. On this map the various bays are labelled. Eples Bay is called Epald Bay, then West-gate Bay and then Gol-gate Bay, now known as St Mildred's Bay. The house at Queeks (now the site of Quex House) is to the south east of Birchington and further east can be seen the image of a windmill. The roads layouts on this map are different to later maps so it is not possible to be certain of the exact location of the PDA but it can be seen that it would be open fields (Fig. 5).

Ordnance Survey Surveyors Drawing from 1797

5.2.2 This is the earliest map that clearly shows the individual buildings and field boundaries. The PDA and immediate area are still fields. The only bay labelled on this map is that of West-gate Bay. To the north of the PDA at West-gate Bay can now be seen some properties aligning the roads to the bay. To the west, Birchington has slightly grown in size, expanding eastwards. This has led to a new road showing in a north westerly to south easterly axis out of Birchington heading towards Woodchurch. To the east of the PDA the small hamlet of Street and the village of Dandelion marked. South of the PDA is a footpath crossing in a west-east axis from the corner of the road from Dandelion towards the road leading towards Birchington (Fig. 6).

Hasted, 1797

5.2.3 The PDA is still fields. The road layout here is different to that shown in the OSD map (Fig. 7)

John Cary, 1812

5.2.4 This map shows some changes, especially to the road network and allows us to orientate the position of the PDA more precisely. A ribbon development has continued eastwards out of Birchington. There is a new road to the north of the PDA that is wider and straighter road that runs west to east from Birchington, passing through Street, towards Westbrook and Margate. The original curvier road is still in place. The PDA is still fields (Fig. 8).

Parish of Acol Tithe Map, 1839

5.2.5 This map shows for the first time the Hundred Farm. The western side of the PDA passes across the eastern range of buildings of the farm. On the north boundary is the road between Margate And Canterbury. To the north on the coast at Westgate Bay can be seen a row of Cottages and another farm being Westgate Farm. The tithe records show that both the farms and arable fields around belonged to Francis Neame (Fig. 9).

OS map 1872

5.2.6 Significant changes have occurred. The railway line has been built to the north of the PDA and broadly follows the direction to the north of the main road between Birchington and Margate. The fields around the Hundred Farm have been divided and have hedgerows/trees around the boundary. On the northern side of the main road opposite the PDA is a new property called Redcliffe Villa. The road opposite the PDA

called Hengist Road travels north towards Westgate Bay over the railway line, ending at the coast with the slipway. This road is one of the original Westgate Roads and endures the formal planning of the Westgate estate, retaining its course. North of the railway line between the railway line and the coast, the beginnings of the layout of the new estate can be seen to the north east of the PDA. To the west of the PDA can be seen the north-south axis parish boundary lines for Westgate (Fig.10).

Historic OS map 1873 1:2,500

- 5.2.7 This map essentially provided greater detail than the one in figure 8. The fields in and around the PDA belonging to Hundred Farm are designated 18, and 20. The southern area of the farm is now a formal garden and orchard area designated field 21, that is possibly a walled kitchen garden. In this area are the initials SH for summer house and a well is just located to the north of this garden. At the southern end of field 21 is a footpath across the arable field to the south. The Hundred farm itself is designated area 19 and has buildings on all four sides around a main courtyard and a smaller courtyard to the south of the main range. It is not clear which of these buildings is the farmhouse. More buildings are located on the north eastern side of the entrance drive to the farm courtyard (Fig.11).

Historic OS map 1898 1:2,500

- 5.2.8 Within and immediately around the area of the PDA there have seen significant changes. Hatton House has been built to the west of Hundred Farm, set back off the Canterbury Road with a lodge at the entrance to the driveway. The plot in front and immediately to the rear of the house is set with lawn surrounded by trees and bushes. Within the front garden area there is highlighted that Roman urns were found there in 1876-80. At the rear of the main garden behind the house are a group of glasshouses. We know from reports that Hatton House also included stable and a coach-house and these may be the buildings located to the east of the main house. Part of these buildings adjoins the western side of the western range of the main courtyard of Hundred Farm. To the west is a large grass area designated the Cricket and Lawn Tennis Ground. This was land that was leased from William Corbett a local landowner in the 1890s. This area is surrounded by hedgerows and trees with a pavilion. South of the cricket pitch is another lawn area where the summer house is now situated in the south west corner. The entrance area to Hundred Farm has altered and is now south straight off the road rather than diagonally across the Hatton

House front lawn area. The northern range of the courtyard buildings has been reduced in size and a gap opened up in the southern range to access the southern courtyard area. To the south of this courtyard area is now a third courtyard area with buildings on all four sides. In line with the eastern range of the main courtyard there are more buildings northwards of that eastern range. To the east of Hundred Farm on its eastern boundary is a new road called Waterworks Road with the waterworks located at the southern end along with a nursery and a group of terraced houses. These houses were built to house the workers. Travelling westwards off the southern end of Waterworks Road is another new road called Gas Works Road which has a small group of terraced houses on its northern side near the junction with Waterworks Road. It is believed that the Gas works were set up around 1876 to service the Westgate estate. The footpath southwards from the Hatton House boundary area is no longer showing. The northern side of Canterbury Road around Radcliffe Villa is now a golf course. The road north over the railway line and to Westgate bay is labelled as Hengist Road. (Fig.12).

Historic OS map 1907, 1: 2,500

- 5.2.9 There do not appear to be any changes to Hatton House, gardens and glasshouses, The Lodge or the building to the east of Hatton House. However, there have been significant changes at Hundred Farm. Only the eastern range of the main courtyard area and the building to the north of that range still exist. The other two smaller courtyard buildings no longer exist. As a result, the eastern boundary line between Hundred Farm and Hatton House instead of being on a north-south axis at that point is now on a diagonal north west-south east axis. There is a new building and boundary plot to the east of the Hundred Farm Eastern boundary on the southern side of Canterbury Road. On the western side of the Cricket and Lawn Tennis Ground there appears to be a footpath that runs southwards alongside the boundary (Fig.13).

Historic OS map 1932 1:2,500

- 5.2.10 Hatton House is now a convent. The Lodge still exists and to the east of The Lodge is a new building in the front garden area, which would have been Little Brescia. The building to the east of what was Hatton House also still exists but a new building has been added to the south adjoining it and further south another large long building, which we know is the 'Convent' school building (Block C). The Cricket and Lawn Tennis area has become a sports ground and the pavilion has been replaced by a large pavilion

structure. The glasshouses at the rear of Hatton House still exist. The long range of buildings in Hundred Farm appear little altered. Waterworks Road and Gas Road to the east and south side of Hundred Farm has been renamed Linksfield Road, which we know happened in 1925 and the road now has properties all along the eastern side of the road. To the east of Linksfield road can be seen the start of new road layouts and more residential properties. The nursery to the south of Hundred Farm has been replaced partly with housing along the road front but also a laundry. Below the southern boundary of the convent, what was previously arable field has now been divided up into smaller plots designated 25, 38h, 38i and 38d. 38i being on the corner of Linksfield Road already has a number of properties on it. To the west side of the sports field, more plots have been created from the arable field being 38e and 38g. 38f appears to have been provided to the area that was previously a footpath running southwards alongside the western boundary of the sports area although this no longer appears to continue all the way southwards. To the north on the golf course, a club house has been built in the south eastern corner of the land (Fig.14).

Historic OS map 1936 1:2,500

- 5.2.11 There does not appear to have been any changes to the convent or the associated sports ground and gardens or to Hundred Farm other than some of the fields to the south east of the school buildings are now labelled playing fields. To the south, along Linksfield Road, a Mission Hall has been built and more properties can be seen (Fig.15).

Historic OS map 1954 1:1,250

- 5.2.12 There have been significant changes to the school buildings. What was previously separate blocks are now all joined together as one. A new building has been constructed joining the eastern side of Hatton House to that of the building that was originally to the east of the house. In addition, these eastern buildings have extended southwards to join the long range. The long range has also been extended on the western side by a new building labelled as a chapel. The building that was to the east of The Lodge is called Little Brasher (later Little Brescia). To the south of the chapel, some of the glasshouses still exist but those on the western side of the group have been replaced by buildings labelled as Ursuline Cottage, which are the housing for the Ursuline Convent Sisters. The gardens and orchards to the south have been replaced by playing fields and tennis courts. The area occupied by Hundred Farm has been

divided on an east west axis. The boundary line has been placed just south of the area that retains the farm buildings. The area to the south has already been replaced by a new housing estate that has been partial built on called Charing Crescent, Chilham Avenue and Hundreds Close. To the south of this estate where the laundry was, are also new houses. The area to the south west of the school playing field is a bulb farm with glasshouses with an electricity sub-station build next to it. The western boundary of the sports ground is officially labelled as a footpath and now continues all the way southwards. To the north of the PDA, on Canterbury Road, part of the northern part of the sports ground has been lost to a widening of the 'Canterbury Road, which starts to show some dualling of the carriageway. (Fig.16).

Historic OS map 1954 1:2,500

5.2.13 No major changes are apparent other than new buildings have been built and formally laid out on one of the plot areas alongside the western side of the playing fields. (Fig.17).

Historic OS map 1960-1962 1:1,250

5.2.145 The conservatory attached at the rear of Hatton house has now been replaced by a small extension. The main block area of the school building has been extended northwards for more classrooms and eastwards for classrooms and a library. One of the playing areas has reverted back to an orchard. The bulb farm has been replaced by residential housing incorporating Ursuline Drive. The Hundred Close estate has also been completely filled with residential housing. The dualling of the Canterbury road has continued eastwards and some of the land at the northern end has been lost to allow for the widening of the road. In addition, the entrance to Linksfield Road has been blocked from Canterbury Road, with access now from Cambourne Road to the east. The area to the south of the playing fields and tennis courts that is sandwiched between Ursuline Drive and Linksfield Road is blank (Fig.18).

Historic map 1963 1:2,500

5.2.15 There appears to be no changes compared to the previous map (Fig. 19)

Historic Map 1973-1975 1:1,250

5.2.16 Within the PDA, Little Brasher has been renamed Little Brescia. A new building has been built between Little Brescia and The Lodge, being a modular terrapin classroom. In the field with the orchard a blank area is carved out and a building added. To the

south of the tennis courts, it appears that the area has been divided by a footpath, southwards from the main school area. To the south east of the PDA, what was Golder Acre has been divided up into housing plots and a new road added called Golden Acre Lane and Golden Close (Fig. 20).

Historic OS Map 1993 1:1,250

5.2.17 The terrapin modular building between Little Brescia and The Lodge has extended southwards. Within the main school block southwards of the Chapel and new range has been added, replacing some of the glasshouses, this is the Lourdes Nursing Home. The area to the far south of the college is labelled as a playing field for the first time. Hundred Farm now has a new building in the eastern side of the plot called Hundred Farmhouse (Fig. 21).

Post 1993

5.2.18 Since 1993 there have been more changes. At the south western end of the main college buildings, a new building has been built around a courtyard that is the Lourdes Nursing Home. The St Angela's junior school complex in this south western area of the site opened in 1998 but closed in 2008 and became the nursing home. Southwards of the nursing home, Block B has now been built and to the south of that the Gym built circa 2007. To the west of the PDA boundary being the playing fields that adjoin the Canterbury Road, a sports pitch and multi-use games area was constructed in 2009/2010. The Hundred Farm stable area became private gated residences sometime around 2010 utilising many of the existing farmstead buildings as well as adding some new ones.

5.3 Site Assessment

5.3.1 The site has been visited a number of times in 2018 and 2019. The PDA comprises of a number of school buildings of various ages, surrounded by hardstanding for recreation such as tennis courts, multi-use games area, paths, access roads and parking. There is a treed grassed area to the north and south of Hatton House as well as the garden that belongs to the Lourdes Nursing Home and areas of playing fields.

5.3.2 Surrounding the PDA is a 19th century brick boundary wall of varying height, which has been punctured in places for access. However, the wall facing Canterbury Road at the northern end is of flint. The PDA is mainly screened from the road by trees and hedges.

5.3.3 The site buildings are used by the college but also other buildings are solely used by Ursuline Convent being the nursing home and the Brescia Community houses to west of the nursing home. These areas were not visited.

5.3.4 There are two Grade II listed buildings within the PDA assessment area (Table 2). However, St Michaels is c.440m from the site. Within the PDA is Hatton House (TR 36 NW 1014), which is a Grade II listed building dating to the late 19th century. Given the distance of St Michael’s from the PDA, this heritage asset will not be considered further.

5.3.5 In addition to the above, curtilage should be considered in relation to other structures around the Grade II listed Hatton House.

Table 2: Designated Heritage Assets

TR 36 NW 1014	Post Medieval	Hatton House, Ursuline Convent School. Grade II listed (1088988).
TR 36 NW 1074	Post Medieval	St Michael’s. Grade II listed (1260333). Convalescent home.

Conservation Areas

5.3.6 A conservation area is defined as an ‘area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance’ Planning (Listed Buildings and Conservation Areas) Act 1990. Conservation Areas are environments which are considered worthy of protection as a result of a combination of factors such as the quality of design and setting of the buildings or their historic significance. There is a Conservation Area to the far north west of the assessment area that was designated in 2006 as Westgate on Sea South. The eastern boundary of the PDA is 440m west from the western edge of the Conservation Area (Fig. 22).

5.3.7 Given the above, the Conservation Area distance from the PDA and as such it does not have the potential to be affected by the proposed development for the PDA it will not be considered further.

5.4 Assessment of Heritage Assets: Listed Buildings

5.4.1 It has been identified that within the development proposals involve changes to the designated heritage asset; the Grade II listed Hatton House, plus the curtilage consideration of Little Brescia and The Lodge. As such the following assessment seeks

to identify the significance of these heritage assets and to what extent the proposed development contributes to this significance.

Hatton House (Listed under the name Ursuline Convent School)

Architectural Interest:

5.4.2 The listing states that it was built in 1886 as a private house, reputedly for a tea planter. However, documentary research undertaken by the Westgate on Sea Heritage Centre confirm that the house was built for William Jarrett, a retired solicitor that was involved in the wider Westgate on Sea estates sales. The front elevation is of two to three storeys with three gables. It is faced with red brick with stone window dressings. Some windows with sashes, some are modified Venetian windows and some mullions and transoms. The porch area contains much stained glass. The ground floor porch with open pediment contains a moulded shell and two plain Tuscan columns and two pilasters. The rear elevation has three gables, two of which are curved. The gables, front and back have monograms with WJJ displayed (Plates 9).

5.4.3 At the time of the building of the main house, The Lodge was constructed and also stables and a coach house with living quarters. The Lodge still exists but it is believed from the map regression that the stables and coach house was demolished to be replaced by school buildings in the late 1930s. At the rear of the house there used to be a conservatory attached. This has been replaced at some point by a brick extension, probably during the late 1950s based on the map regression.

5.4.4 The listing refers to good interior of the period. Staircase with heavy carved balusters. The Parlour has a Neo-Jacobean plasterwork ceiling of scrolls and putti and the Library has a strapwork plastered ceiling. There are fireplaces with swag or scroll decorations and one marble fireplace with pilasters in the shape of terms and a swag frieze.

5.4.5 An article in The Builders Magazine date June 12th 1886, supplies additional information. It confirms that the architect was John Thomas Wimperis. He was born in 1829, died 1904 and practiced in London. His most noticeable buildings he designed being shops in Oxford Street opposite Selfridges, which are still in use today and he was associated with the Grosvenor Estate. Early photographs of the house thought to date from the 1890s can be seen in the cover plate and Plate 17.

Historical Interest:

5.4.6 The house is of historical interest architecturally, being of a late Victorian gothic style house built by a well-known prominent architect. Externally it retains many of its original features and forms part of the history of the growth of the Westgate-on-Sea estate. There have been some minor changes in respect of the replacement of the conservatory and in the 1930s when the eastern side was knocked through to join the wider complex of the school buildings. Also, the number of chimneys has been reduced. Internally, there have been changes to the layout to accommodate the building being used as a school and the later extensions. However, the architecturally significant rooms are virtually unaltered. In the areas that were of less architectural interest as a result of the rooms being part of the house that the servants used, there have been minor changes to the internal placements of doorways and windows.

Setting:

5.4.7 Hatton House is located on the southern side of the Canterbury Road. It is set back from road and historically it would have been accessed from the north western corner via a driveway from The Lodge. It is now accessed via the north eastern side. In front of the house, it retained a front garden area set to lawn and planted with mature trees. As the building is set back from the Canterbury Road, it is not possible to view the heritage asset from road since it is currently obscured by trees and also the current buildings located on along the northern boundary. To the rear of the house, it is set to lawn, facing the chapel with the 1930s adjoining area and Block C to the eastern side, forming a three-sided courtyard.

5.4.8 Given that the many phases of school buildings and convent buildings established across the school site already detracts from the original setting of the building, it is considered that the heritage asset's historic setting has already been significantly eroded.

Summary of Significance:

5.4.9 Given the above it is concluded that the extent of the heritage asset's original setting has already been eroded. The asset retains much of its late 19th century structure internally and externally, albeit with a few changing aspects, the major one being the addition of the adjoining 1930s building. Nonetheless it is still considered to have aesthetic and historical interest, and it is this that forms its primary heritage significance.

Little Brescia

Architectural Interest and Historical Interest:

5.4.10 Little Brescia, is considered here under curtilage. It is a stand-alone building located in the north eastern corner of the PDA. Built in 1907 at the same time as a number of other developments concerning the school site, predominately being the range of Block C to the south east of Hatton House. In February 1907, the local Gazette reported that the 'foundation stone of the new convent has been laid in the grounds of Hatton House'. The architect was named a Mr Robert Dalby Reeve of Margate. It is believed Little Brescia was built as a house for the chaplain.

5.4.11 In order to assess whether curtilage applies to Little Brescia the guidance from Historic England is used to assess the structure. There are three factors to consider. The physical layout of the listed building, in this case Hatton House, their ownership both historically and at the date of listing as well as the use and function of the relevant buildings, historically and at the date of listing. Hatton House was listed on the 22nd February 1973. Obviously, Hatton House and Little Brescia have always been in the same ownership as a school. Therefore, Little Brescia has always been ancillary to the listed house when in use as a school and at the date of listing (although not when in use as a private house) and within the boundaries of the estate. It also existed prior to 1948. It is therefore considered to fall under the curtilage of the grade II listed Hatton House.

5.4.12 Little Brescia is currently utilised by the school for storage and consequently the house has not been lived in for a number of years. It has not been possible to visit the house internally but viewed from outside, it has a tired appearance and has little by way of any architectural merit or character. The house is built with red brick of the same type on the 1907 Block C building south east of Hatton House. It is two storeys with a pitched roof including chimney stack and clay tiles. The windows appear original but have little by way of character.

Setting

5.4.13 Little Brescia at the time of building would have been tucked away in the north eastern corner of the PDA, with the original lodge on the north western corner. Like the Lodge it would have been seen from the road but would have initially been more noticeable given that it is two storeys in height whereas The Lodge is of a single storey. Little Brescia would have been separated from Hatton House by the retention of the front garden with its grass and mature trees. As a result, there was never any clear

intervisibility between Little Brescia and Hatton House. The building of Little Brescia would have predominately obscured the view of Hatton House from the road. The setting of Little Brescia would have altered in the 1960s with the construction of modular terrapin classroom located immediately to its west in between Little Brescia and the Lodge. The mature treed front garden area, limiting any intervisibility of this building with that of Hatton House. As the classroom is a prefabricated modular building predominately utilising wood as the main construction material of several decades in age, it has an even greater tired appearance than that of Little Brescia, which detracts from the overall setting in that area of Hatton House and also that of The Lodge immediately to the west. The current top part of this building and roof of the current St Cecilia classroom can be seen above the boundary wall from the main road and its poor condition detracts from the wider public view.

Summary of Significance:

5.4.14 It is concluded that Little Brescia is of low heritage significance historically, architecturally and that the extent of the heritage asset's original setting has already been eroded. It makes little by way of contribution to its overall visual setting. The original purpose of Little Brescia has also significantly altered during its lifetime, leading to its use for just storage and not being valued and not in a good state of repair and its original purpose no longer having relevance.

The Lodge

Architectural and Historical Interest:

5.4.15 The Lodge was built at the same time as Hatton House in 1886 and falls under curtilage as a heritage asset. It is a single storey building and was located adjacent to the initial entrance to the Hatton House estate. The lodge is built of stone and flint with red clay tiled roof. The construction of The Lodge mirrors the materials used for the adjacent boundary wall. It has architectural and historical significance as it is associated with the main house. Previously let out as a house for residential use it is currently vacant and totally separate to that of the school.

Setting:

5.4.16 The original setting of The Lodge has altered. It is no longer used as the main entrance, although the gates and driveways still exist and are not in use although the presence of

the drive and gates still lends a sense of place as to their original purpose. The setting as a gatehouse would have altered at the beginning of the 20th century with the arrival of the school and the additional school buildings added in the area of the PDA. In addition, the setting would have further altered in the 1960s with the arrival of the wooden classroom located immediately to its east, of which is quite close to the building as can be seen in plate 16. The current classroom building is in a tired state and detracts from the immediate setting of The Lodge.

5.5 Aerial Photographs

1940

5.5.1 The photo has not been stitched together in perfect alignment across the PDA area. However, the location of Hatton House can be seen with the various chimneys and a building from the house in the south eastern corner. This building then traverses southwards before reaching the chapel, which can be seen on an east-west alignment. Below the chapel area appears to be fields. To the south west of the chapel can be seen the large greenhouse and other smaller buildings. To the east is Hundred Farm and the land there is cultivated. To the east of Hundred Farm can be seen the start of the housing development along Waterworks Road. To the north on the opposite side of Canterbury Road is the golf course. To the west of the PDA are playing fields. To the far south is the housing development along Gas Road, surrounded by arable fields (Plate 1).

1960s

5.5.2 The PDA can clearly be seen within a number of mature trees around and within the boundaries. To east, Hundred Farm has reduced in size retaining the northern part the borders Canterbury Road. To the south and east of Hundred Farm is now residential housing. There is also more housing to the south of the PDA, which is then surrounded by arable farmland. To the west is still playing fields then the King Ethelbert Secondary School complex. To the north, Canterbury Road is now a dual carriageway with a golf course still on the opposite side (Plate 2).

1990

5.5.3 This photo provides greater clarity of the school buildings within the PDA. We can see that new buildings have been built south of the chapel. In addition, the garden buildings

that were to the south west of the chapel have been replaced by new structures. South of those buildings appears to be an orchard area with tennis courts south of the orchard and then playing fields. At the far northern end of the PDA, a building has been built in between the Little Brescia building in the north eastern corner and The Lodge in the far north western corner. To the east at Hundred Farm a farmhouse has been built on the eastern portion of the site (Plate 3).

2003

5.5.4 At the PDA, in the south western part of the site Block B has been constructed, reducing the size of the orchard area. In addition, the tennis courts have move further south, utilising some of the southern playing field area. (Plate 4).

2007

5.5.5 At the PDA, the sports hall has now been constructed, situated south of Block B, which means the entire orchard area has now been covered by buildings. No other changes are noted. (Plate 5).

2009

5.5.6 There does not appear to be any changes. (Plate 6).

2013

5.5.7 There do not appear to be any changes (Plate 7).

2017

5.5.8 There do not appear to be any changes (Plate 8).

6 PROPOSALS AND ASSESSMENT OF IMPACT

6.1 Proposals

6.1.1 The proposals concern the demolition of the detached house of Little Brescia and the current terrapin modular classroom of St Cecilia to be replaced by a new single storey three room classroom also called St Cecilia.

6.1.2 This Heritage Statement accompanies a detailed application for the proposed development mentioned above within the PDA as set out in the existing and proposed drawings in Figure 3.

6.2 Assessment of Impact

6.2.1 From our findings, the primary heritage significance of Hatton House is its aesthetic and historic interest as a late Victorian mansion house built during the formative years of the Westgate on Sea estate. It retains many original architectural features internally and externally, which forms its primary heritage significance. The proposed development will not alter that significance and will only have a minor impact on its wider setting. The current under-utilised nature of Little Brescia, along with that of the poor condition of the current St Cecilia classroom detracts from the wider setting of Hatton House and also the public perception from the road. The replacement of Little Brescia and St Cecilia with a single storey structure for modern purpose-built classrooms, using similar colour red bricks with a grey render mirroring the flint colour of the adjacent boundary wall will have an overall improvement to the wider setting. As a single storey building, it will be similar in height to that of the existing classroom and lower in height than that of Little Brescia. This will help reduce the overall massing and provide improvements to the street scene and not overshadow The Lodge. In addition, the western side of the proposed classroom will be sited further away from The Lodge, which will further assist in improving its setting. Figure 3 shows a proposed street scene. There will be a small improvement in that potentially more of Hatton House may be viewed from the road due to the lower height of the proposed classroom compared to Little Brescia. However, this is considered a minor improvement as any intervisibility will still be limited due to the mature trees in the front garden area. The siting of the proposed classroom has been carefully considered in order to retain as much of the existing landscaping and trees as possible in order to preserve the overall setting and street scene of this part of the PDA.

- 6.2.2 Therefore, the overall impact of the proposed development for the classroom does not impact upon the architectural and historical significance of Hatton House and the nearby Lodge. Their heritage value carries medium significance. There will be a negligible change to the overall setting of these buildings causing a neutral/slight magnitude of effect, which can also be considered beneficial. Therefore, any impact caused to the setting of these two heritage assets would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.
- 6.2.3 Little Brescia is under the curtilage of Hatton House but this does not preclude it from potential demolition. Despite its curtilage, it does not have any interest. It is of very low significance in that it has little architectural and historical merit. It was not built at the same time as that of the designated heritage assets of Hatton House and The Lodge and it is not used for its original purpose as the Chaplain's house but for storage. As such, the demolition of Little Brescia, whilst it will be destroyed, due to its negligible/low significance, this will only lead to a slight/neutral magnitude of effect and would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.
- 6.2.4 As well as overall improvements to the setting of the designated and on-designated heritage asset, the public benefit in providing three new classrooms in a modern purpose-built building is considered significant and will far outweigh and potential harm caused and allows for the optimum use for the school of areas not currently utilised to their full potential.

7 CONCLUSION

- 7.1 The purpose of this Built Heritage Statement was to assist the Local Authority to fully understand the impact of the proposed development as required by the NPPF on the significance of Heritage Assets affected, including any contribution made by their setting. This Built Heritage Statement has been prepared by SWAT Archaeology for Bond Bryan Architects Ltd in support of the application for proposed developments at Ursuline College, 225 Canterbury Road, Westgate-on-Sea, Kent.
- 7.2 This report has demonstrated that the PDA lies close to two Grade II Listed Heritage Assets, one of which is located within the PDA, Hatton House. In addition, there are a number of other buildings that fall within the curtilage of Hatton House. Little Brescia and The Lodge in the area of the proposed development.
- 7.3 This report demonstrates that the significance of Hatton House resides in its architectural and historical interest. The Lodge, being contemporary with the house, also has architectural and historical interest, which for both buildings form their primary significance. Continuing development of the school within the PDA area for Hatton House since the early 20th century, has eroded the setting of this Heritage Asset and those within its curtilage. Especially for The Lodge which is situated immediately adjacent to St Cecilia and detracts from its setting.
- 7.4 For Little Brescia, this also falls within the curtilage of Hatton House. However, it was built later than The Lodge and Hatton House as a small house originally for the chaplain being it only historical interest. As a modern detached house, it has no architectural merit and as such is of very low significance, which does not preclude its demolition. The proposed development for the demolition of Little Brescia and St Cecilia, to be replaced by a 3-classroom single storey building is considered to have a minor magnitude of impact on the setting of Hatton House and The Lodge. The current structures to be demolished are in poor condition and detract from the setting and street scene. As such the proposed changes are considered to have a neutral/slight but beneficial magnitude of effect to the setting of Hatton House and The Lodge and the

impact on significance of these heritage assets would be considered as 'less than substantial' in accordance with NPPF Paragraph 196.

- 7.5 As well as overall improvements to the setting of the designated and on-designated heritage asset, the public benefit in providing three new classrooms in a modern purpose-built building is considered significant and will far outweigh and potential harm caused and allows for the optimum use for the school of areas not currently utilised to their full potential.

8 OTHER CONSIDERATIONS

8.1 Archive

8.1.1 Subject to any contractual requirements on confidentiality, two copies of this Heritage Asset assessment will be submitted to the LPA and Kent County Council (Heritage) within 6 months of completion.

8.2 Copyright

8.2.1 Swale & Thames Survey Company and the author shall retain full copyright on the commissioned report under the Copyright, Designs and Patents Act 1988. All rights are reserved, excepting that it hereby provides exclusive licence to Bond Bryan Architects Ltd (and representatives) for the use of this document in all matters directly relating to the project.

Paul Wilkinson PhD MCIfA.

SWAT Archaeology

November 2020

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10 APPENDICES

10.1 Appendix 1: Statutory List Description

10.1.1 Ursuline Convent

Heritage Environment Record Number: TQ 86 NE 1144.

List entry Number: 1088988

National Grid Reference: TR 31639 69530

Grade II

Date First Listed: 22nd February 1973

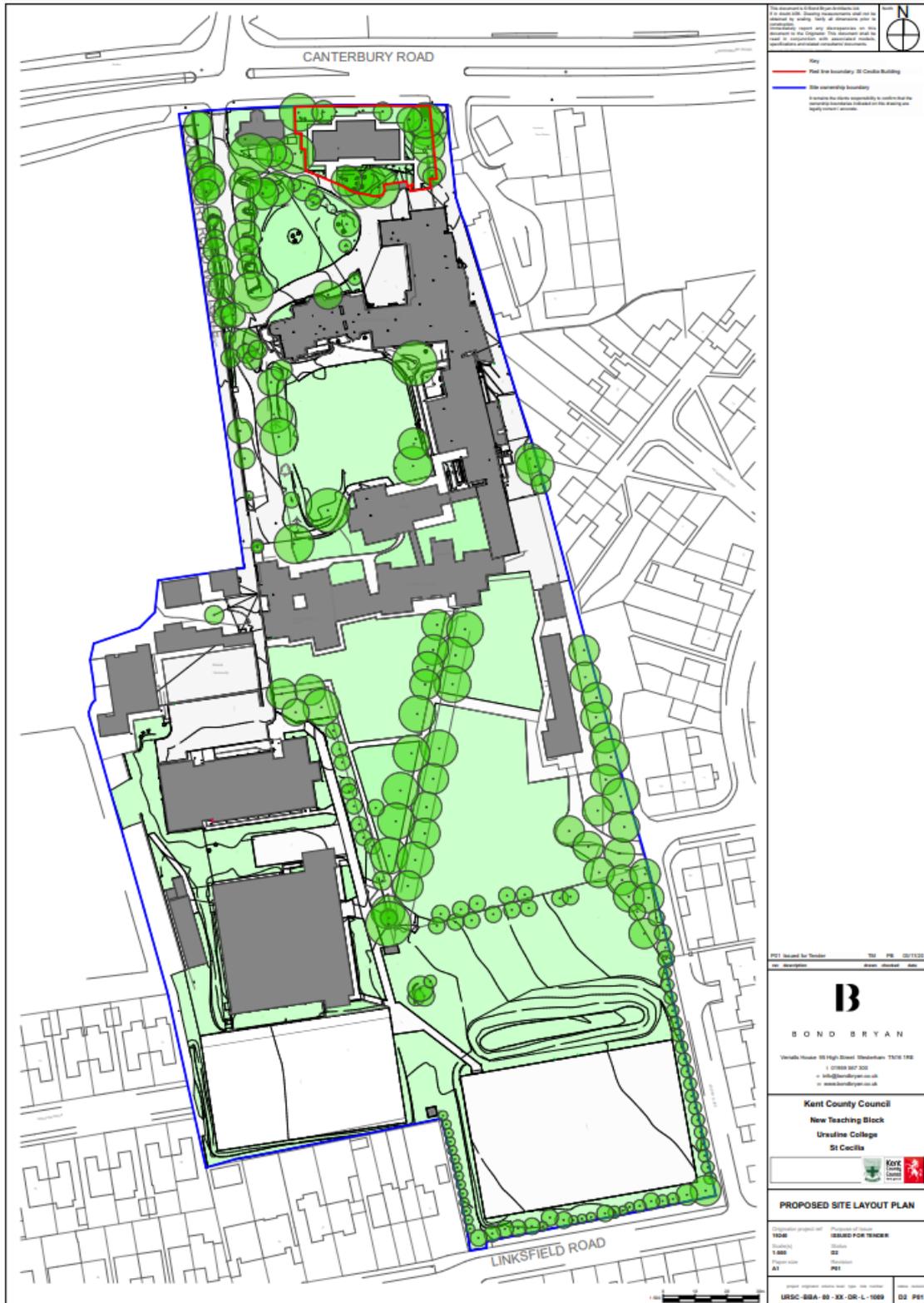
Built in 1886 as a private house, reputedly for a tea planter. The front elevation is of 2 to 3 storeys red brick with stone window dressings, 3 gables. Some sashes, some modified Venetian windows and some mullions and transoms. Ground floor porch with open pediment containing moulded shell and 2 plain Tuscan columns and 2 pilasters. The rear elevation has 3 gables, 2 of them curved. Good interior of the period. Staircase with heavy carved balusters, the Parlour has a Neo-Jacobean plasterwork ceiling of scrolls and putti and the Library has a strapwork plastered ceiling. Fireplaces with swag or scroll decorations and 1 marble fireplace with pilasters in the shape of terms and a swag frieze.



Figure 1: Location map of the Grade II listed Ursuline Convent (red dot) with the boundary of the PDA (indicated in red line).



Figure 2: Site Location Plan 1:10000



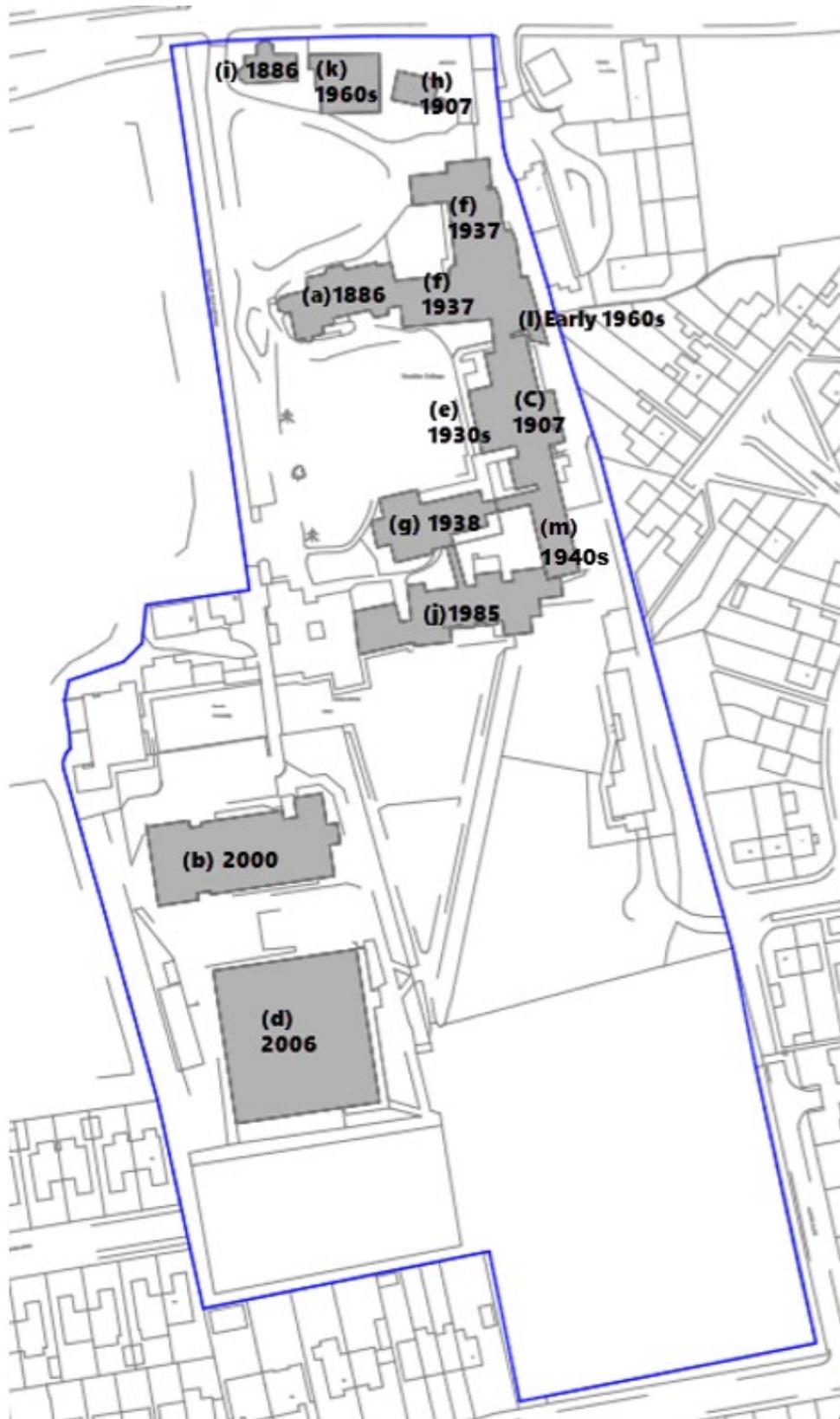


Figure 4: Phasing of the buildings within the PDA (a) Hatton House; (b) Block B 'Ursulas'; (c) Block C 'Convent'; (d) Sports Hall; (e) Dining Room extension (f) infill between Hatton House and Block C; (g) Chapel; (h) Little Brescia; (i) The Lodge; (j) Lourdes Nursing Home; (k) Classrooms; (l) library (m) 1940s extension.

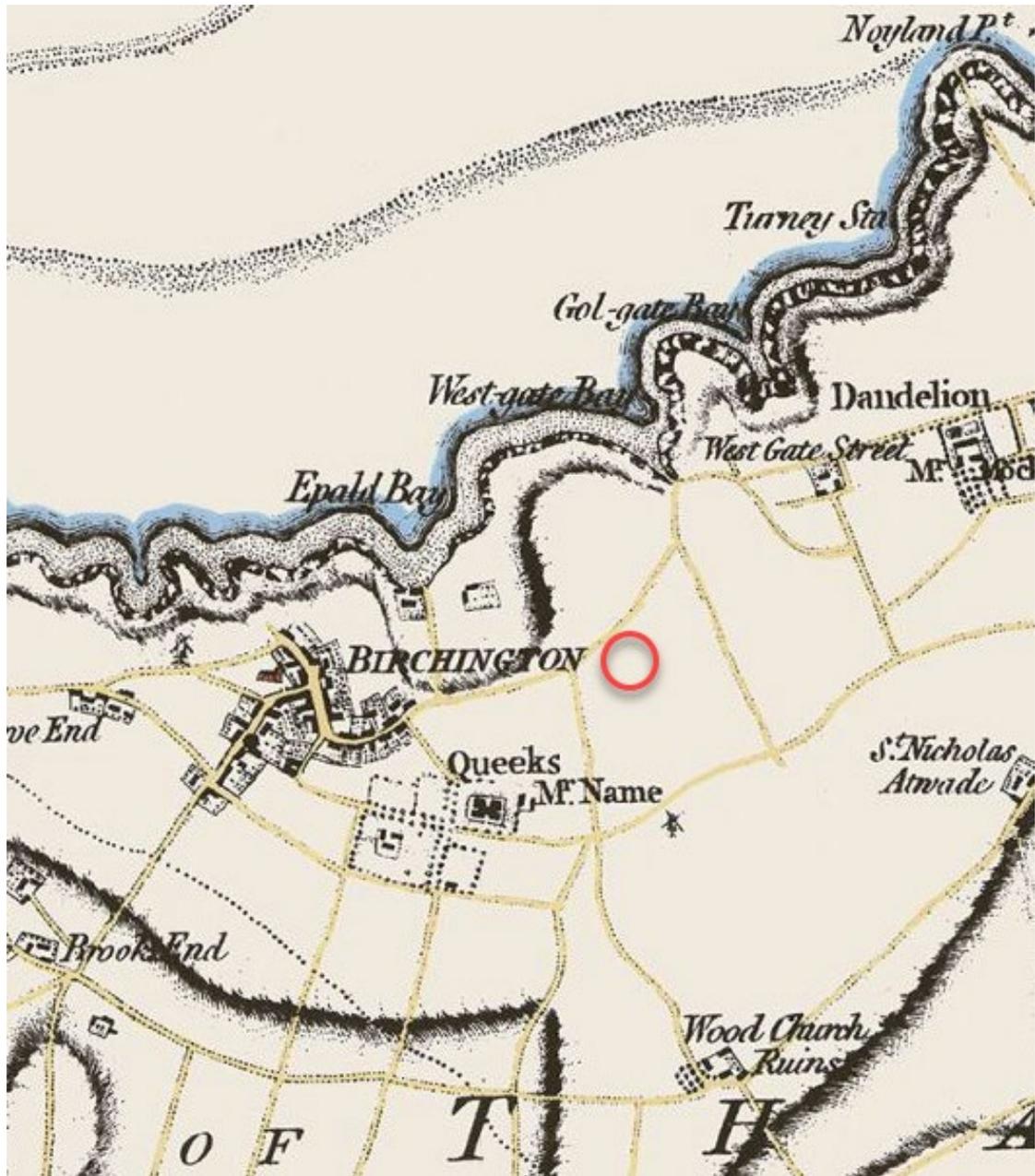


Figure 5: Andrew, Dury and Herbert Map from 1769

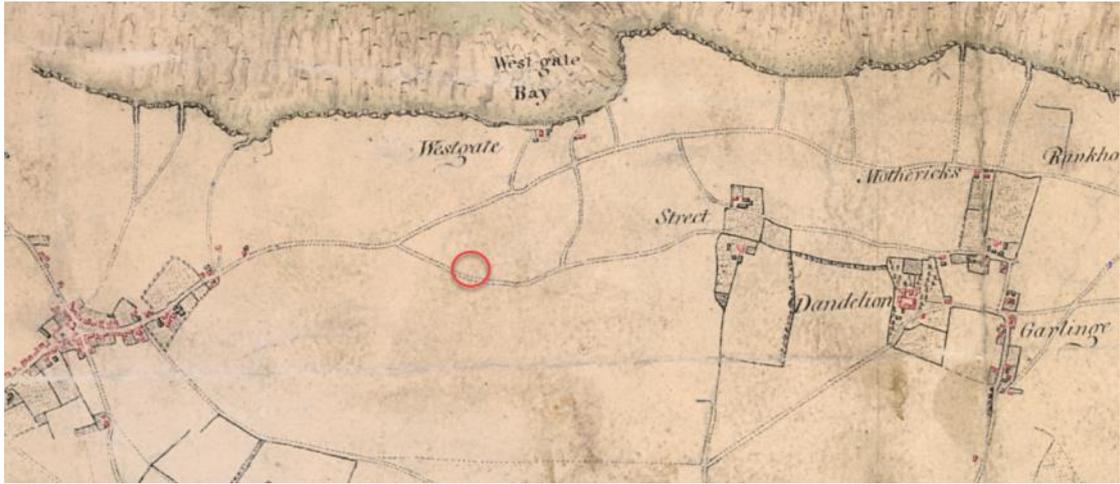


Figure 6: Ordnance Surveyors Drawing 1797

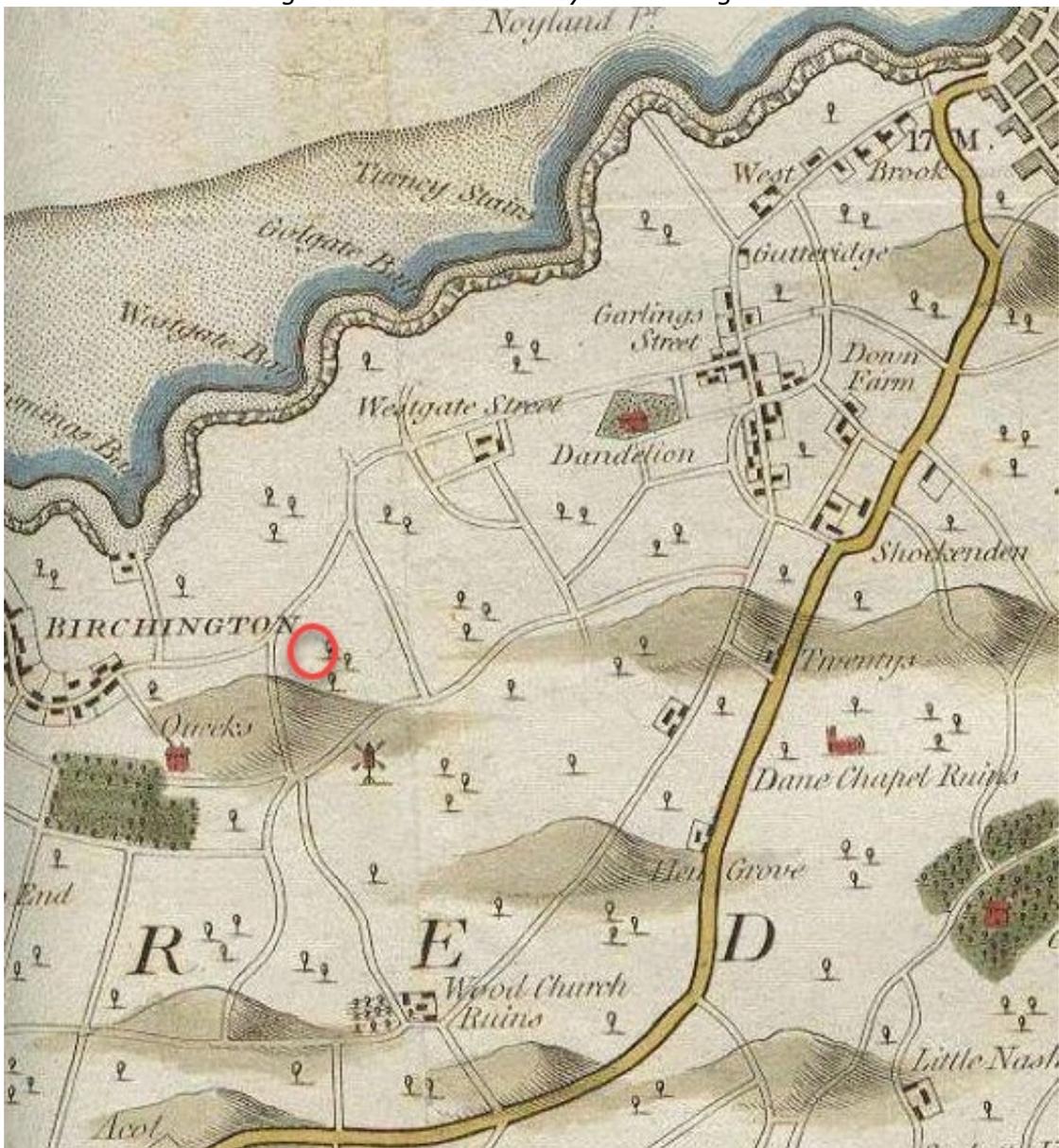


Figure 7: Hasted 1797,



Figure 8: John Cary 1812

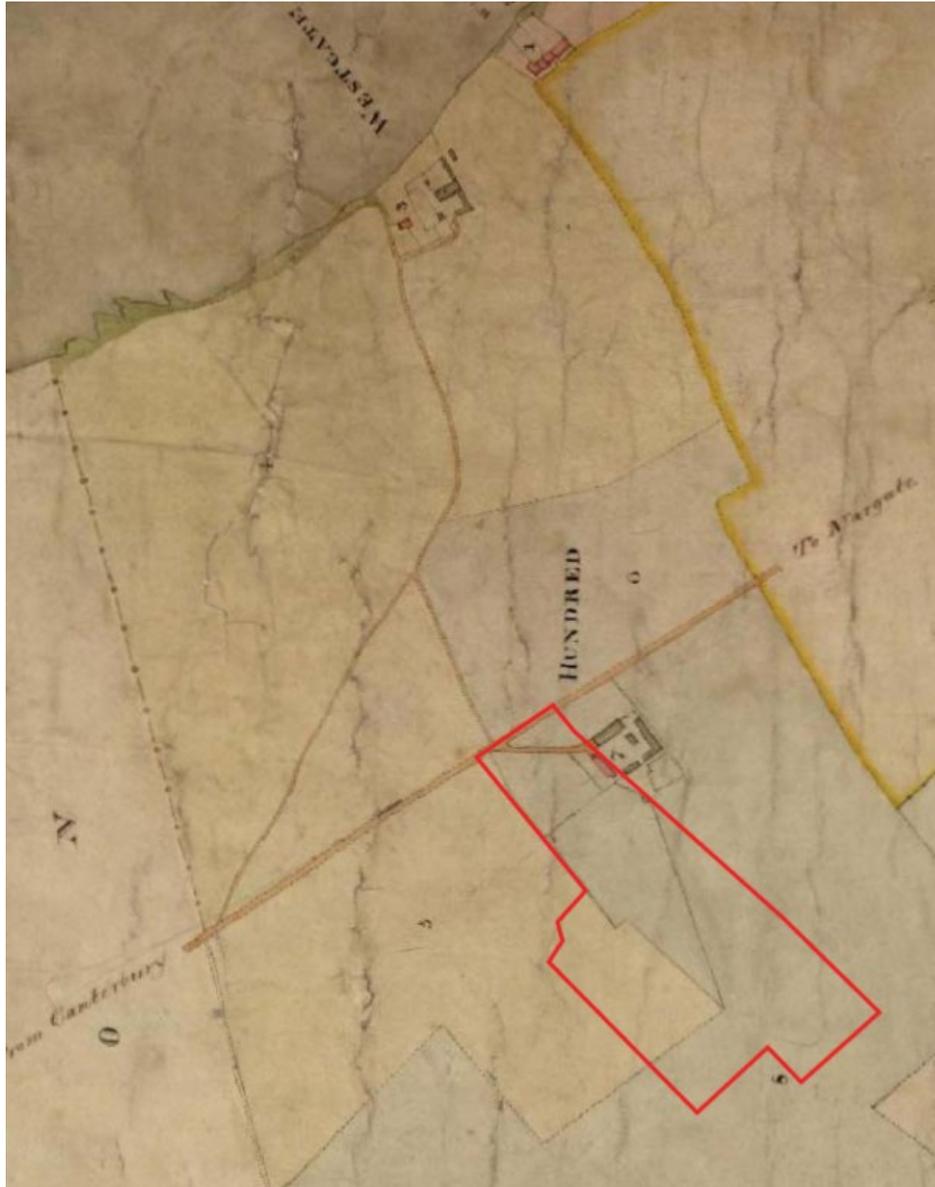


Figure 9: Parish of Acol Tithe Map, 1839



Figure 10: OS Map from 1872

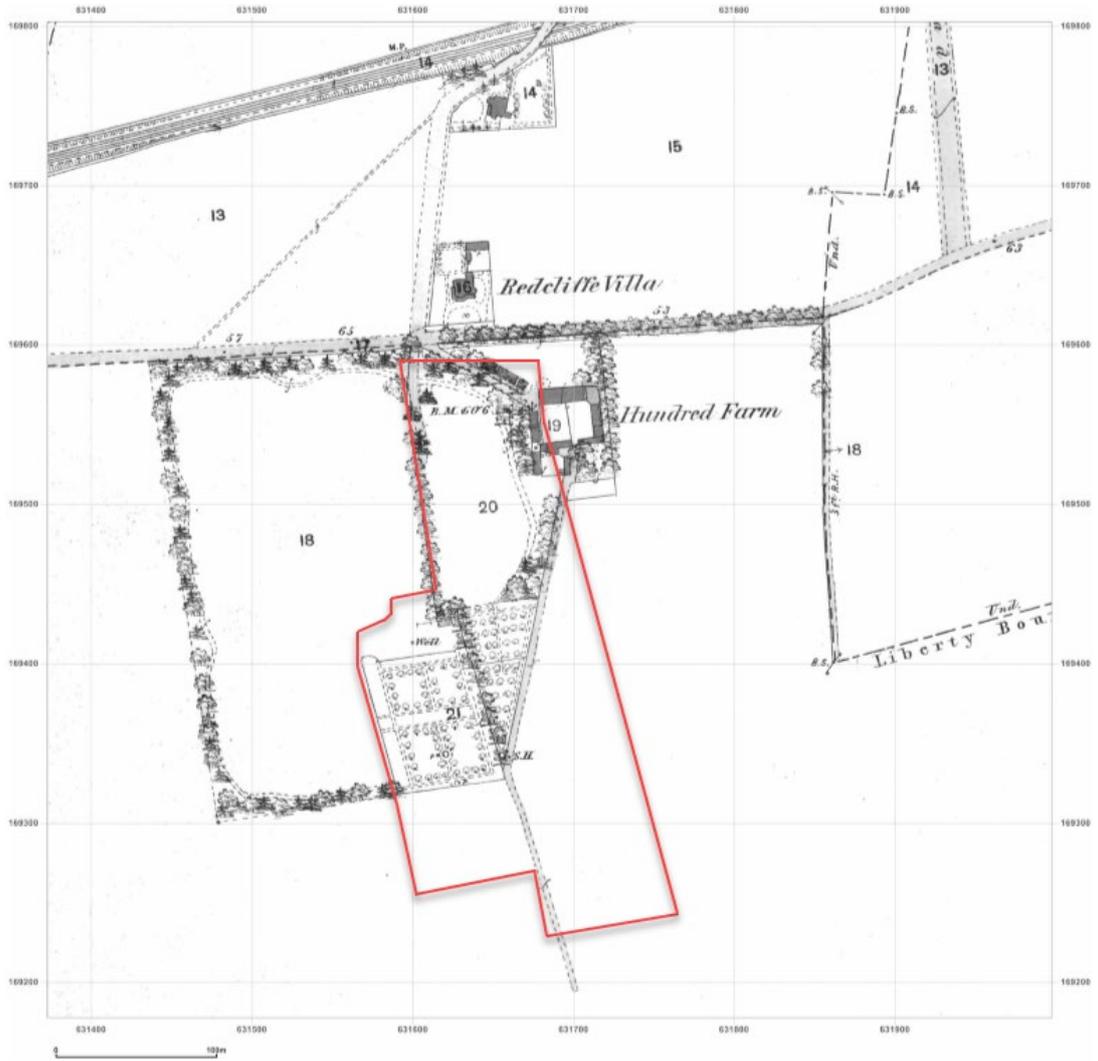


Figure 11: OS Map from 1873 1:2500



Figure 12: OS Map from 1898 1:2500

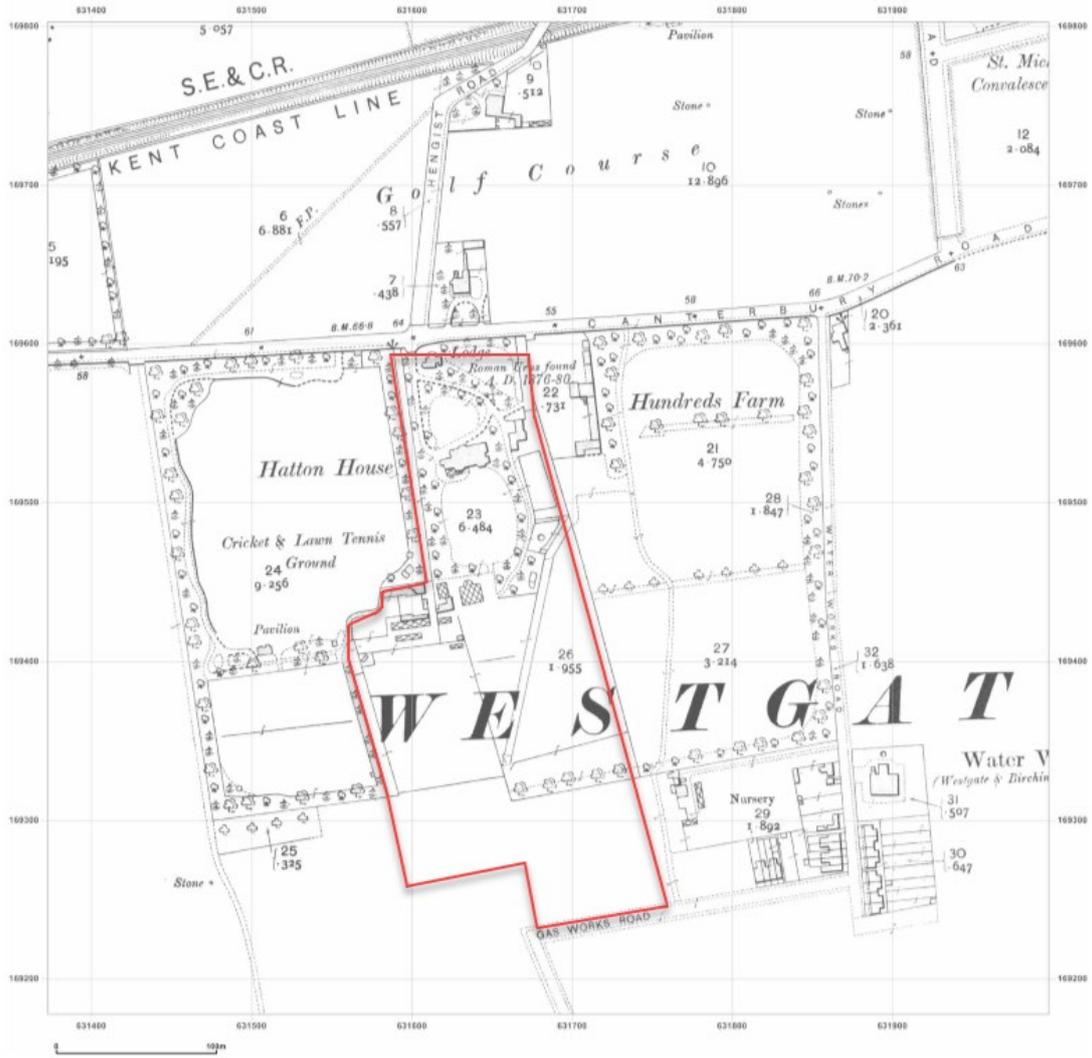


Figure 13: OS Map from 1907 1:2500

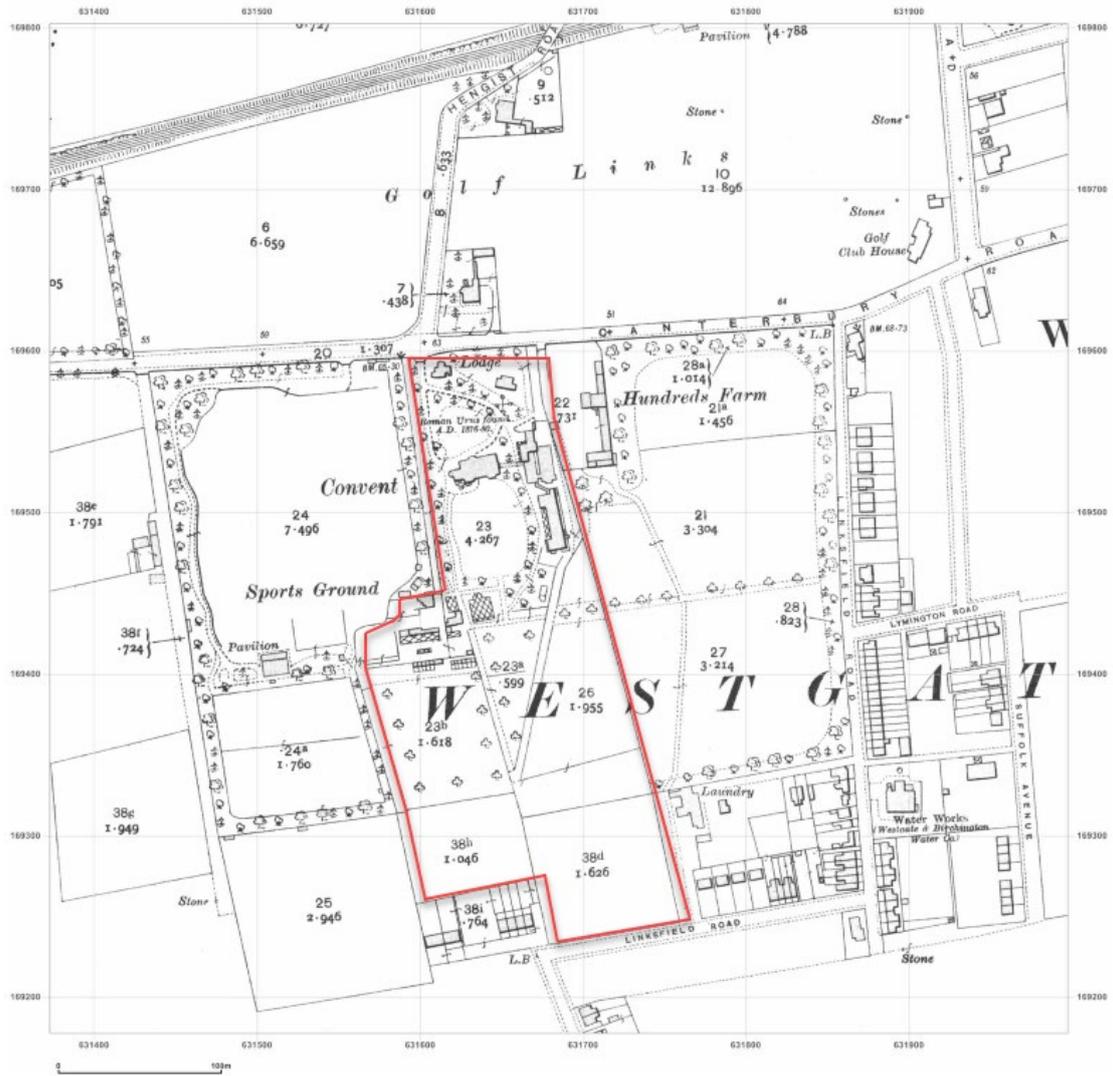


Figure 14: OS Map from 1932 1:2500



Figure 15: OS Map from 1936 1:2500



Figure 16: OS Map from 1954 1:1250



Figure 17: OS Map from 1954 1:2500



Figure 18: OS Map from 1960-1962 1:1250



Figure 19: OS Map from 1963 1:2500



Figure 20: OS Map from 1973-1975 1:1250



Figure 21: OS Map from 1993 1:1250

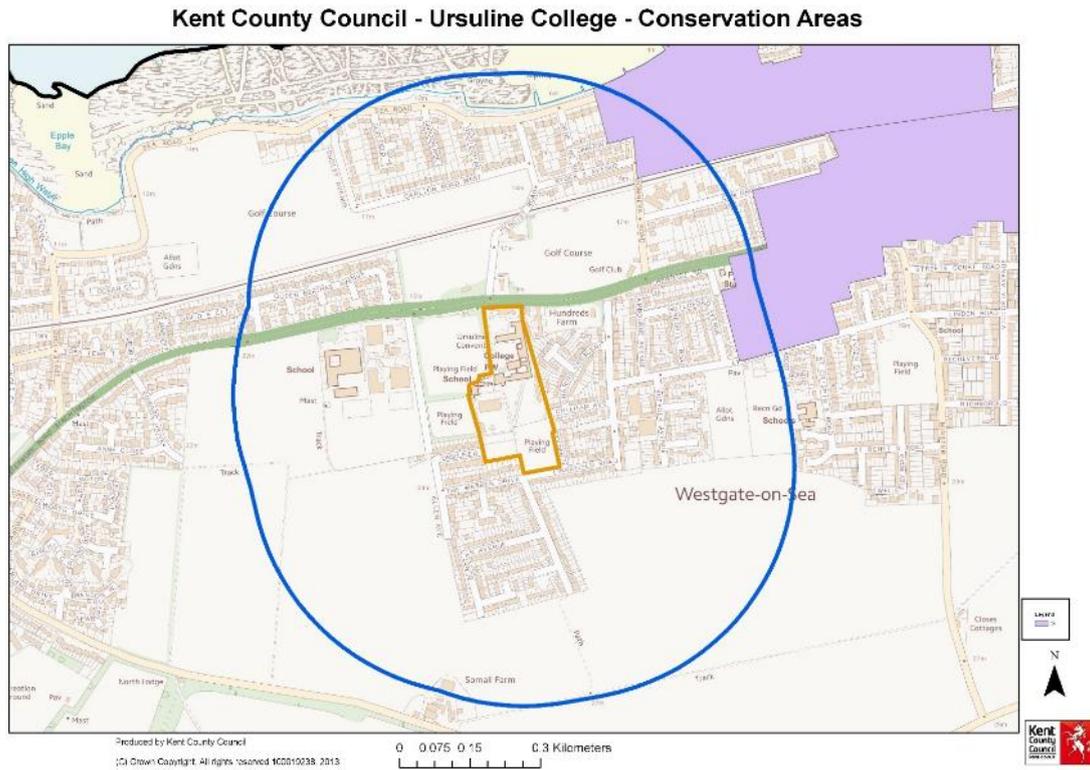


Figure 22: KHER Conservation Area



Plate 1: 1940, all at an altitude of 1.92km (Google Earth).



Plate 2: 1960 (Google Earth)



Plate 3: 1990 (Google Earth)



Plate 4: 2003 (Google Earth)



Plate 5: 2007 (Google Earth)



Plate 6: 2009 (Google Earth)



Plate 7: 2013 (Google Earth)



Plate 8: 2017 (Google Earth)



Plate 9: View of the existing classroom from the road (facing SE).



Plate 10: Front of Hatton House (facing SSE).



Plate 11. Front of Little Brescia (looking NNE)



Plate 12: Front of the existing classroom (looking NW).



Plate 13: View of Little Brescia and the existing classroom from the road. (looking SW)



Plate 14: View of Hatton House and part of the 1937 extension showing the red brick type (looking SW)



Plate 15: View of the other 1907 school building (facing SE)



Plate 16: View of St Cecilia and part of The Lodge (facing NE), photo courtesy of Bond Bryan.



Plate 17: Rear of Hatton House, thought to be taken in the 1890s. (Westgate on Sea Historic Society)

10.2 DMRB Assessment Methodology

10.2.1 Criteria for level of significance

Level of Significance	Criteria
Very high	World Heritage Sites. Assets of acknowledged international importance.
High	Scheduled Monuments and undesignated assets of Schedulable quality and importance. Grade I and II* Listed buildings (Scotland category A). Other Listed buildings that can be shown to have exceptional qualities in their fabric or associations not adequately reflected in their Listing grade. Conservation Areas containing very important buildings. Undesignated structures of clear national importance.
Medium	Designated or undesignated assets that contribute to regional research objectives Grade II (Scotland category B) Listed buildings. Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical association. Conservation Areas containing important buildings that contribute significantly to their historic character.
Low	Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual associations. Assets of limited value, but with potential to contribute to local research objectives.
Negligible	Assets with very little or no surviving archaeological interest. Buildings of no architectural or historical note and buildings of an intrusive character. Landscapes with little or no significant historical interest.

10.2.2 Criteria for assessing magnitude of Impact

Magnitude of Impact	
Major	Change to key historic building elements, such that the asset is totally altered Comprehensive change to the setting.
Moderate	Change to many key historic building elements, such as the asset is significantly modified. Changes to setting of an historic building, such that it is significantly modified.
Minor	Changes to key historic building elements, such that the asset is slightly different. Changes to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to historic building elements or setting that hardly affect it.
No Change	No change to fabric or setting.

10.2.3 Magnitude of Effect Matrix

Heritage Value	<i>Very High</i>	Neutral	Slight	Moderate / large	Large or very Large	Very large
	<i>High</i>	Neutral	Slight	Moderate / slight	Moderate / large	Large / very large
	<i>Medium</i>	Neutral	Neutral / Slight	Slight	Moderate	Moderate / large
	<i>Low</i>	Neutral	Neutral / slight	Neutral / Slight	Slight	Slight / moderate
	<i>Negligible</i>	Neutral	Neutral	Neutral / Slight	Neutral / Slight	Slight
	<i>No Change</i>	<i>Negligible</i>	<i>Minor</i>	<i>Moderate</i>	<i>Major</i>	
	Magnitude of Impact					