

Net Zero Teesside Project

Planning Inspectorate Reference: EN010103

Land at and in the vicinity of the former Redcar Steel Works site, Redcar and in Stockton-on-Tees, Teesside

The Net Zero Teesside Order

Document Reference: 9.33 – Response to Examining Authority’s Written Question HE.2.6

Planning Act 2008



Applicants: Net Zero Teesside Power Limited (NZN Power Ltd) & Net Zero North Sea Storage Limited (NZNS Storage Ltd)

Date: September 2022

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GLOSSARY

Abbreviation	Description
BEIS	The Department for Business, Energy and Industrial Strategy
CCGT	Combined Cycle Gas Turbine
CCUS	Carbon Capture, Utilisation and Storage
CO ₂	Carbon dioxide
DCO	Development Consent Order
ES	Environmental Statement
ExA	Examining Authority
FEED	Front End Engineering Design
km	Kilometres
NZT	The Net Zero Teesside Project
NZT Power	Net Zero Teesside Power Limited
NZNS Storage	Net Zero North Sea Storage Limited
PA 2008	Planning Act 2008
PCC	Power Capture and Compressor Site
PINS	Planning Inspectorate
SoS	Secretary of State
STDC	South Tees Development Corporation

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1.0 INTRODUCTION

1.1 Overview

1.1.1 This response to the Examining Authority's Written Question HE.2.6 [PD-016] has been prepared on behalf of Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited (the 'Applicants'). It relates to the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy ('BEIS'), under Section 37 of 'The Planning Act 2008' (the 'PA 2008') for the Net Zero Teesside Project (the 'Proposed Development').

1.1.2 The Application was submitted to the SoS on 19 July 2021 and was accepted for Examination on 16 August 2021. A change request made by the Applicants in respect of the Application was accepted into the Examination by the Examining Authority on 6 May 2022.

1.2 Description of the Proposed Development

1.2.1 The Proposed Development will work by capturing CO₂ from a new the gas-fired power station in addition to a cluster of local industries on Teesside and transporting it via a CO₂ transport pipeline to the Endurance saline aquifer under the North Sea. The Proposed Development will initially capture and transport up to 4Mt of CO₂ per annum, although the CO₂ transport pipeline has the capacity to accommodate up to 10Mt of CO₂ per annum thereby allowing for future expansion.

1.2.2 The Proposed Development comprises the following elements:

- **Work Number ('Work No.') 1** – a Combined Cycle Gas Turbine electricity generating station with an electrical output of up to 860 megawatts and post-combustion carbon capture plant (the '**Low Carbon Electricity Generating Station**');
- **Work No. 2** – a natural gas supply connection and Above Ground Installations ('AGIs') (the '**Gas Connection Corridor**');
- **Work No. 3** – an electricity grid connection (the '**Electrical Connection**');
- **Work No. 4** – water supply connections (the '**Water Supply Connection Corridor**');
- **Work No. 5** – waste water disposal connections (the '**Water Discharge Connection Corridor**');
- **Work No. 6** – a CO₂ gathering network (including connections under the tidal River Tees) to collect and transport the captured CO₂ from industrial emitters (the industrial emitters using the gathering network will be responsible for consenting their own carbon capture plant and

connections to the gathering network) (the '**CO₂ Gathering Network Corridor**');

- **Work No. 7** – a high-pressure CO₂ compressor station to receive and compress the captured CO₂ from the Low Carbon Electricity Generating Station and the CO₂ Gathering Network before it is transported offshore (the '**HP Compressor Station**');
- **Work No. 8** – a dense phase CO₂ export pipeline for the onward transport of the captured and compressed CO₂ to the Endurance saline aquifer under the North Sea (the '**CO₂ Export Pipeline**');
- **Work No. 9** – temporary construction and laydown areas, including contractor compounds, construction staff welfare and vehicle parking for use during the construction phase of the Proposed Development (the '**Laydown Areas**'); and
- **Work No. 10** – access and highway improvement works (the '**Access and Highway Works**').

1.2.3 The electricity generating station, its post-combustion carbon capture plant and the CO₂ compressor station will be located on part of the South Tees Development Corporation ('STDC') Teesworks area (on part of the former Redcar Steel Works Site). The CO₂ export pipeline will also start in this location before heading offshore. The generating station connections and the CO₂ gathering network will require corridors of land within the administrative areas of both Redcar and Cleveland and Stockton-on-Tees Borough Councils, including crossings beneath the River Tees.

1.3 The Purpose of this Document

1.3.1 The purpose of this document is to support the Applicants' response to the Examining Authority's Written Question HE.2.6, which notes:

"The nearest Listed buildings to the PCC site are located at Marsh Farm, Warrenby. A limited assessment of the group of three Listed buildings at Marsh Farm is provided within ES Chapter 18 (paragraphs 18.6.14 to 18.6.24). Paragraph 18.6.4 of ES Appendix 18 [APP-338] notes that the buildings date from the late 18th Century.

ExQ1 HE.1.4 iv) asked whether the Applicants' assessment of impacts to the setting of nearby designated heritage assets in ES Chapter 18 (paragraphs 18.6.14 to 18.6.24) was sufficient, and whether their significance has been adequately identified and assessed. RCBC in their response [REP2-094] stated that 'there is potential for greater impact on setting, for example even from Huntcliff overlooking Saltburn'.

Could RCBC explain further their response and provide comments specific to the group of Grade II listed buildings at Marsh Farm.

Could the Applicants:

i) Provide a copy of the List descriptions for all three listed buildings at Marsh Farm; and

ii) Provide a more detailed assessment of their significance and the effect of the Proposed Development on their setting in accordance with section 5.8 of NPS EN-1 so that the ExA is able to make an informed recommendation in accordance with Section 3(1) of the Infrastructure Planning (Decisions) Regulations 2010.”

2.0 ASSESSMENT OF SIGNIFICANCE OF MARSH FARMHOUSE AND COTTAGE; BARN AND STABLE AND GARDEN WALL

2.1 Methodology and guidance

2.1.1 In accordance with best practice guidance and as determined by policy requirements, this additional assessment identifies the baseline heritage significance of the asset.

2.1.2 Significance has been determined from a review and analysis of historical and cartographic sources. The review considers not only the intrinsic historical interest of the asset but also the extent of its setting. The significance of the asset is determined by a combination of heritage interests including those derived from setting.

2.1.3 The assessment of significance of the group of Grade II listed buildings at Marsh Farm follows guidance set out in Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets, which was published by Historic England in 2019; and Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets, which was published by Historic England in 2017.

2.1.4 Advice Note 12 outlines a recommended approach to assessing the significance of heritage assets in line with the requirements of the NPPF. It suggests creating a statement that is proportionate to the asset's significance (its heritage value) and the potential degree of impact of a proposed development. The Advice Note also offers an interpretation of the various forms of heritage interest that an asset can possess, based on the terms provided in the NPPF Glossary. The core heritage interests are defined as follows:

- **Historic Interest** – An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- **Architectural and Artistic Interest** – These are interests in the design or general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration or buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Archaeological Interest** – There will be archaeological interest in a heritage asset if it holds, or has the potential to hold, evidence of past human activity worth of expert investigation at some point.

2.2 Listing description

- 2.2.1 The listed building descriptions of the group of buildings is summarised below and the full National Heritage List description is presented in Appendix A of this assessment.
- 2.2.2 Marsh Farmhouse and Farm Cottage (NHLE 1160308) is a 2-storey, 3-bay late 18th century farmhouse and slightly later cottage with an early 19th century extension. It is comprised of brick with a rendered rear wall, with clay pantile roofs and stone gable copings on the farmhouse. The buildings have renewed sash windows with glazing bars, plastered and painted reveals, sills and wedge lintels. The middle window on the first floor is blocked and there are altered windows in their original openings. A single-storey extension has an altered door and the porches to the front and rear are not of interest. The listing description states that the farmhouse may incorporate remains of the 13th century chapel of St. Sepulchre. However, it is also suggested that the barn may contain fabric from the medieval chapel.
- 2.2.3 The Barn and Stable (NHLE 1139620) are located approximately 10m north-west of Marsh Farmhouse. The buildings are L-shaped in plan and consist of a 2-storey barn and single-storey stable. They comprise late-18th century brick structure with clay pantile roofs, stone ridges and gable copings. Late-19th century window openings. String course between floors; stepped brick at eaves on both sides. Boarded door and timber lintel under blocked first-floor opening in west gable end. Late-19th century cart opening in east return, gable rebuilt c.1900. Rebuilt stack at south-west corner. Stable adjoins right end of barn. Later extensions adjoining south side of barn and west side of stable are not of special interest. The stable is included in the listing for its contribution to group value.
- 2.2.4 The Boundary Wall (NHLE 1139619) encloses the garden and is late-18th century brick, built in two phases in English Garden Wall bond. Original low wall of 6 courses with brick-on-edge coping, raised by 13 courses with similar coping. Opening in middle of south wall. Side walls raked and ramped up at ends to short north returns adjoining farmhouse and cottage. Left side wall has segment-headed opening in north end and a boarded door in north return. The wall is included in the listing for group value.

2.3 Historic background

- 2.3.1 The following historical narrative derives from baseline research carried out for the DCO application, including a review of historic maps viewed at Teesside Archives, and from a review of online sources, including: <http://www.redcar.org/marsh-house-farm/>.
- 2.3.2 A map surveyed between 1778 and 1811 by Jonathan Teal shows the majority of the area was enclosed by the late-18th century, with small

areas of common pasture, moors and wastes still present on the outskirts of settlements, such as at Coatham, and at the foot of Eston Hills. The pattern of large-scale enclosure was generally complete by the early-18th century and farming intensified during this period. Farms in the area were well-placed to support emerging industrial centres, such as Middlesbrough, which experienced rapid growth from the late-18th century. Marsh Farmhouse is believed to have been built in 1770 on a track known as Marsh Road and was part of the local farming communities that worked the cultivated fields around Coatham and helped support a population that was growing in line with the growth of industry.

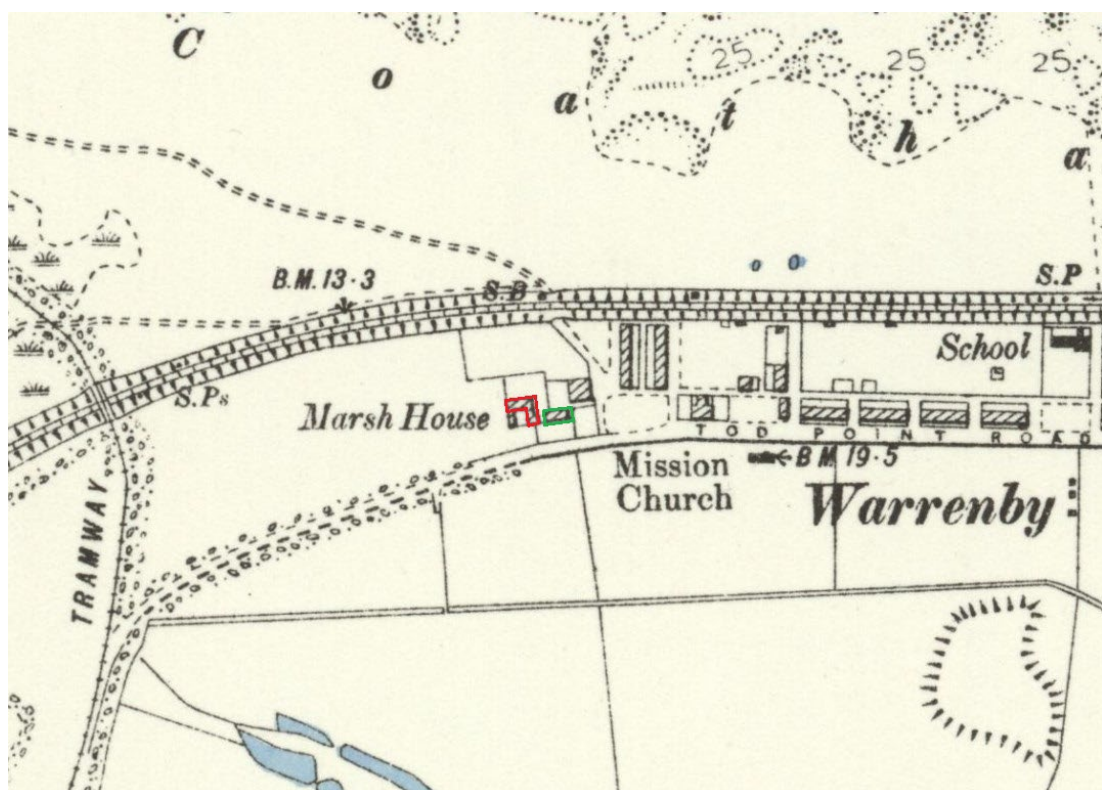
- 2.3.3 The Ordnance Survey (OS) map surveyed in 1853 and published in 1857 (Plate 1) shows the building, named 'Marsh House' in an isolated location at the end of Marsh Road. Coatham Junction railway is to the north, with Coatham Common and the North Sea beyond, and to the south lies the open marshland of Coatham Marsh, with enclosed fields beyond.
- 2.3.4 On the western side of the house is a 'U' shaped range of buildings which comprise the 2-storey barn with the single-storey stable on its west side, and another building on its east side. A garden is to the south of the house with another slightly larger enclosed space beyond. A small building is shown on the west side of Marsh House which is the later cottage extension. The group of buildings is within a space that is delineated by a boundary which probably consisted of a hedge, wall or bank.

Plate 1: Extract from the Ordnance Survey 6" map surveyed in 1853. Marsh House outlined in green and the barn and stables in red. Map extract photographed at Teesside Archives.



- 2.3.5 The OS map surveyed in 1893 (Plate 2) shows Marsh House and associated buildings in an altered landscape setting. The core setting of the group of buildings is intact which is principally the house, the 'U'-shaped range of buildings set within the boundaries shown on the earlier OS map.
- 2.3.6 The growth of industry in the area has resulted in the emergence and expansion of settlement areas, and the houses, school building and mission church of Warrenby have encroached on the east of Marsh House. Marsh Road is lost by this point and, instead, Tod Point Road forms the principal access route through Warrenby, passes along the southern edge of Marsh House and garden, and from there runs as a pathway to the Coatham and Redcar Iron Works to the west. The 1893 map shows several footpaths crossing Coatham Common and ending to the north of Marsh House. This is likely one of the various Fisherman's crossings which cross the common to the beach and it is alleged that this was also the route used to take lifeboats to the sea
- 2.3.7 The land to the south of Marsh Farm has become further enclosed in proximity to the house and to the south of Warrenby but, beyond the enclosures, marshland and earthworks from historical saltworks are still a defining characteristic of the landscape in which the house sits.

Plate 2: Extract from the Ordnance Survey 6" map surveyed in 1893 showing Marsh House outlined in green and the barn and stables in red. Map extract photographed at Teesside Archives.



- 2.3.8 Later maps, surveyed between 1913 and 1953, show further changes in the wider landscape, principally associated with the changing developments and expansion at Coatham and Redcar Iron Works to the west of the farm, but little change to the buildings or their immediate setting. Later 20th century map evidence shows changes to the boundaries around the farm buildings, and further significant changes within the wider landscape, but no significant changes to the buildings themselves.
- 2.3.9 The present-day buildings are arranged as they are illustrated and surveyed on historical maps, and their associative relationship with one another is largely intact. The wider landscape setting of the buildings has changed. Buildings and structures associated with light industry are present to the east and south-east of the farm buildings, and a compound or storage yard for industrial machinery and vehicles is to the north. A large earthen bund, approximately 10m high, is located on the west and south-west side of the buildings which precludes views beyond it.
- 2.4 Heritage significance and setting**
- Significance
- 2.4.1 As set out in the methodology, the significance of a heritage asset is defined as the sum of its heritage interests, which are assessed below.
- 2.4.2 *Historic interest:* The Grade II listed house and associated buildings are of medium heritage value and occupy an area at the head of Coatham Marshes, a space between the arable landscape of the south, heavy industry to the west, and the sea to the north, and its historic interest derives, in part, from its relationship with both the land and the sea.
- 2.4.3 The house, emphasised by its isolated location, would likely have been a landmark for locals and travellers. Anecdotal evidence from local accounts includes suggestions that the house was used by smugglers due to its isolated position and proximity to the sea and, more mundanely, the house would have been part of the collective experience of the workers who travelled daily from Warrenby and Coatham along the footpath, past the house, on their way to the local iron and steel works. The house, barn and stable represent an example of the type of dispersed farmstead that was more characteristic of the area in the late-18th and 19th centuries and which generally consisted of a farmhouse to one side of a courtyard of farm buildings. This building group displays this style of arrangement and the combination of barn, stable and other ancillary buildings, may be indicative of the mixed farming practices of the period and collectively they articulate the agricultural history of the area.
- 2.4.4 *Architectural and Artistic interest:* The farmhouse is late-18th century, with a later cottage extension, and the principal house displays a symmetry in the front elevation with central porch. The later additions to the farmhouse, which include modern windows within their original openings and the 20th-century porch, have no architectural interest. The

main architectural interest of the farmhouse, barn and stable is as a relatively cohesive example of buildings constructed on a local scale, using local materials and built in a local style. The addition of the later cottage demonstrates that the building use has seen adaptation and represents change throughout its life.

- 2.4.5 *Archaeological interest:* Map evidence suggests the buildings' form has changed little since they were constructed and there is unlikely to be anything of significant archaeological interest. The north corner of the barn includes sandstone within its fabric which is purported to derive from a 13th century chapel. However, this is anecdotal and, although referenced in the National Heritage Listing description, has not been corroborated on site by a visual inspection.

Setting

- 2.4.6 The group of buildings is located at the western end of Tod Point Road and surrounded by light industry to the east and south-east and heavy industry to the west and north. The buildings are no longer an isolated group and sounds from nearby works and workshops form part of the experience of the group.
- 2.4.7 The barn and stable represent the functional setting of the farmhouse and the walled garden provides the aesthetic and domestic setting of the farmhouse. Historically, the agricultural landscape beyond the building group would have represented the principal setting of the buildings, as the land represents why the buildings were constructed and lived in. However, the landscape beyond the building group no longer contributes to, or helps articulate, any of the buildings' heritage interests. The creation of an earthen bund to the west and south-west of the buildings means that, visually, there is no longer a legible connection with the marsh and agricultural land to the south.
- 2.4.8 An appreciation of the buildings' historical relationship with the sea has also been lost, or at least eroded significantly, by the presence of building and structures to the north and the progressive growth of Coatham Dunes following the construction of South Gare Breakwater. The presence of the earthen bund also reduces views of the heavy industry to the west, which historically would have been prominent within the visual setting of the farm buildings during the 19th and 20th centuries and would have contributed to the farm's historical context.
- 2.4.9 The principal component of the setting of Marsh Farmhouse, Barn, Stable and Garden Wall, which contributes to their heritage significance, is therefore the associative relationship of the component buildings with each another.

2.5 Impacts from Proposed Development

- 2.5.1 There would be no physical change to the buildings as a result of the Proposed Development, therefore, potential impacts may derive only as a result of change within their setting which could affect their heritage value.

Construction impacts

- 2.5.2 The wider landscape does not contribute to the setting of the buildings. As stated in Paragraph 18.6.16 of Chapter 18 of the ES [APP-100], temporary changes to the setting of the buildings may occur during construction, resulting from aural intrusion. The nearest construction activity would be at the PCC Site, located approximately 650 m to the west of the farm buildings. Noise modelling has predicted a maximum daytime noise level of 58 dB LAeq,12h during the construction phases from activities such as demolition, site clearance, piling and foundations activities and building. The noise levels would likely be noticeable from the group of buildings but would represent only a slight change to their baseline setting and would not result in loss of heritage value. In accordance with the criteria in ES Vol I Chapter 18 Archaeology and Cultural Heritage [APP-100], the magnitude of impact is assessed to be low, on a receptor of medium heritage value, resulting in a temporary minor adverse effect, which is not significant.

Operation impacts

- 2.5.3 It is assessed that the wider landscape does not contribute to the setting of the farm buildings. The earthen bund, to the west and south-west of the farm, curtails views of marshland to the south and precludes views of the heavy industry to the west which, historically, used to form part of the farm's visual setting.
- 2.5.4 The operational PCC Site may be visible above the bund in views from the north western edge of the building group, which would introduce an additional industrial component into the view. The operational PCC Site would represent a noticeable addition within the assets' visual setting but would represent only a slight change to their baseline setting and would not result in loss of heritage value. In accordance with the criteria in ES Vol I Chapter 18 Archaeology and Cultural Heritage [APP-100], the magnitude of impact is assessed to be low, on a receptor of medium heritage value, resulting in a minor adverse effect, which is not significant.

Decommissioning impacts

- 2.5.5 There would be no additional impacts on cultural heritage assets during decommissioning activities.

APPENDIX A: FULL NATIONAL HERITAGE LIST DESCRIPTION

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1160308**

Date first listed: **29-Apr-1988**

Statutory Address 1: **MARSH FARMHOUSE AND FARM COTTAGE, TOD POINT ROAD**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

[Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/) (<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **MARSH FARMHOUSE AND FARM COTTAGE, TOD POINT ROAD**

The building or site itself may lie within the boundary of more than one authority.

District: **Redcar and Cleveland (Unitary Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **NZ 57953 25053**

Details

REDCAR TOD POINT ROAD, west end. NZ 52 NE 1/91 Marsh Farmhouse and Farm Cottage. G.V. II

Farmhouse, late C18 and slightly later farm cottage with early C19 right extension. May incorporate remains of C13 chapel of St. Sepulchre. Brick; rear wall of cottage rendered. Clay pantile roofs, with stone gable copings on farmhouse. 2-storey, 3-bay farmhouse. Central late C20 porch. Renewed sash windows with glazing bars, plastered and painted reveals, sills and wedge lintels. Middle window on first floor blocked. Lower 2-storey, one-window cottage adjoining right. Boarded door at left; altered windows in original openings; brick flat arches on ground floor. Stepped brick at eaves. Single-storey lean-to outhouse extension has altered door. End stacks. Blocked segment-headed garret lights in returns and scattered fenestration at rear of farmhouse. Porches at front and rear are not of interest.

Listing NGR: NZ5795325053

Legacy

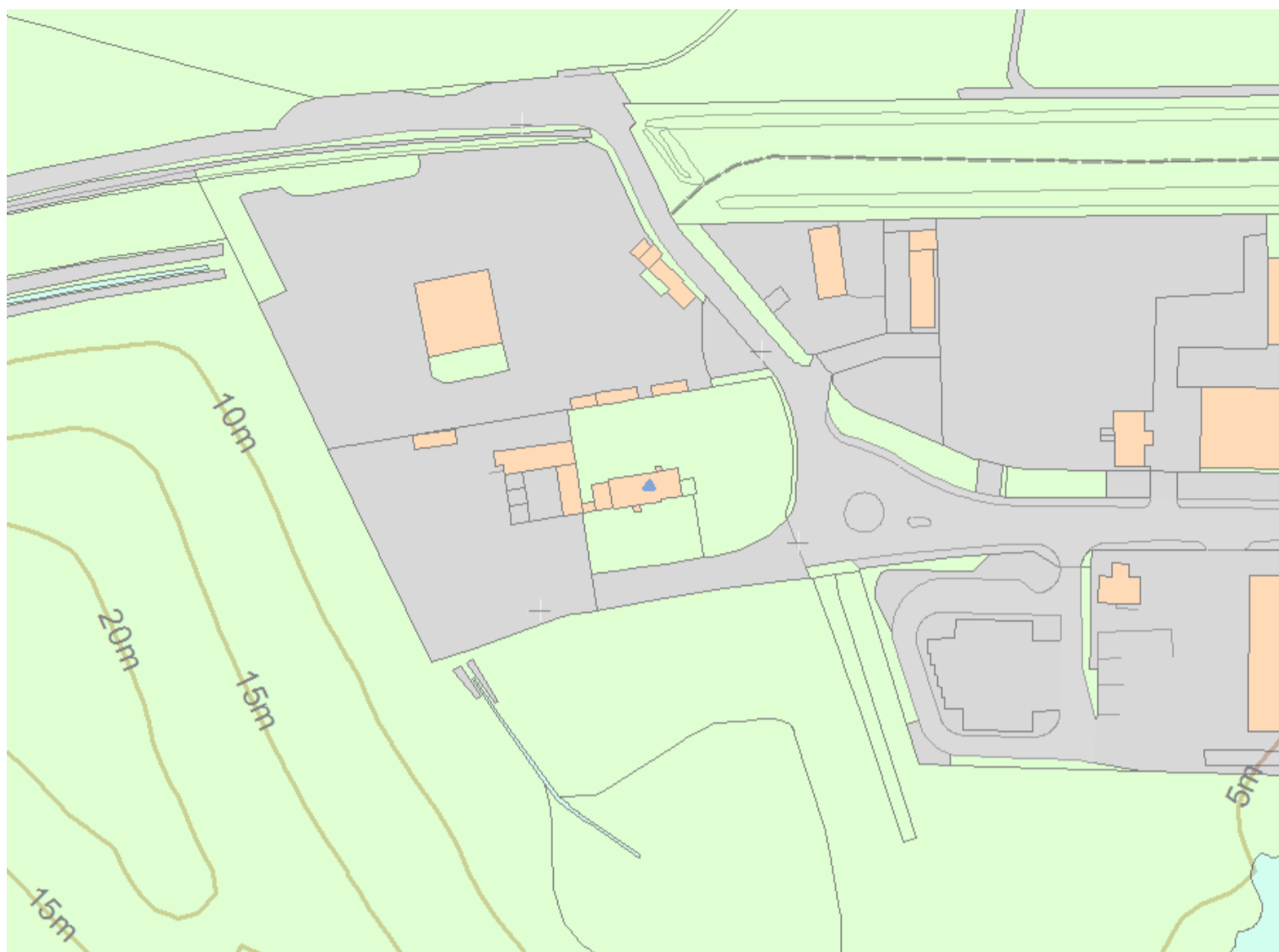
The contents of this record have been generated from a legacy data system.

Legacy System number: **60352**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

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End of official list entry

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1139620**

Date first listed: **29-Apr-1988**

Statutory Address 1: **BARN AND STABLE CIRCA 10 METRES NORTH WEST OF MARSH FARMHOUSE, TOD POINT ROAD**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](#)

[Corrections and minor amendments](#)

Location

Statutory Address: **BARN AND STABLE CIRCA 10 METRES NORTH WEST OF MARSH FARMHOUSE, TOD POINT ROAD**

The building or site itself may lie within the boundary of more than one authority.

District: **Redcar and Cleveland (Unitary Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **NZ 57927 25060**

Details

REDCAR TOD POINT ROAD, west end NZ 52 NE 1/93 Barn and stable, c.10m north-west of Marsh Farmhouse G.V. II

Barn and stable, late C18. Brick; clay pantile roofs with stone ridge and gable copings. "L"-plan; 2-storey barn and single-storey stable. South face of barn has breathers in groups of 3 on first floor. Rear has blocked off-centre segment-headed cart entrance, now holding altered doorway, at left. Late C19 window openings further left. String course between floors; stepped brick at eaves on both sides. Boarded door and timber lintel under blocked first-floor opening in west gable end. Late C19 cart opening in east return, gable rebuilt c.1900. Rebuilt stack at south-west corner. Stable adjoins right end of barn. Later extensions adjoining south side of barn and west side of stable are not of special interest. Stable included for group value.

Listing NGR: NZ5792725060

Legacy

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Legacy System: **LBS**

Legal

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End of official list entry

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1139619**

Date first listed: **29-Apr-1988**

Statutory Address 1: **GARDEN WALL SOUTH OF MARSH FARMHOUSE, TOD POINT ROAD**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](#)

[Corrections and minor amendments](#)

Location

Statutory Address: **GARDEN WALL SOUTH OF MARSH FARMHOUSE, TOD POINT ROAD**

The building or site itself may lie within the boundary of more than one authority.

District: **Redcar and Cleveland (Unitary Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **NZ 57955 25035**

Details

REDCAR TOD POINT ROAD, west end. NZ 52 NE 1/92 Garden wall south of Marsh Farmhouse. G.V. II

Boundary wall enclosing garden, late C18 in 2 builds. Brick in English Garden Wall bond. Original low wall of 6 courses with brick-on-edge coping, raised by 13 courses with similar coping. Opening in middle of south wall. Side walls raked and ramped up at ends to short north returns adjoining farmhouse and cottage. Left side wall has segment-headed opening in north end and a boarded door in north return. Included for group value.

Listing NGR: NZ5795525035

Legacy

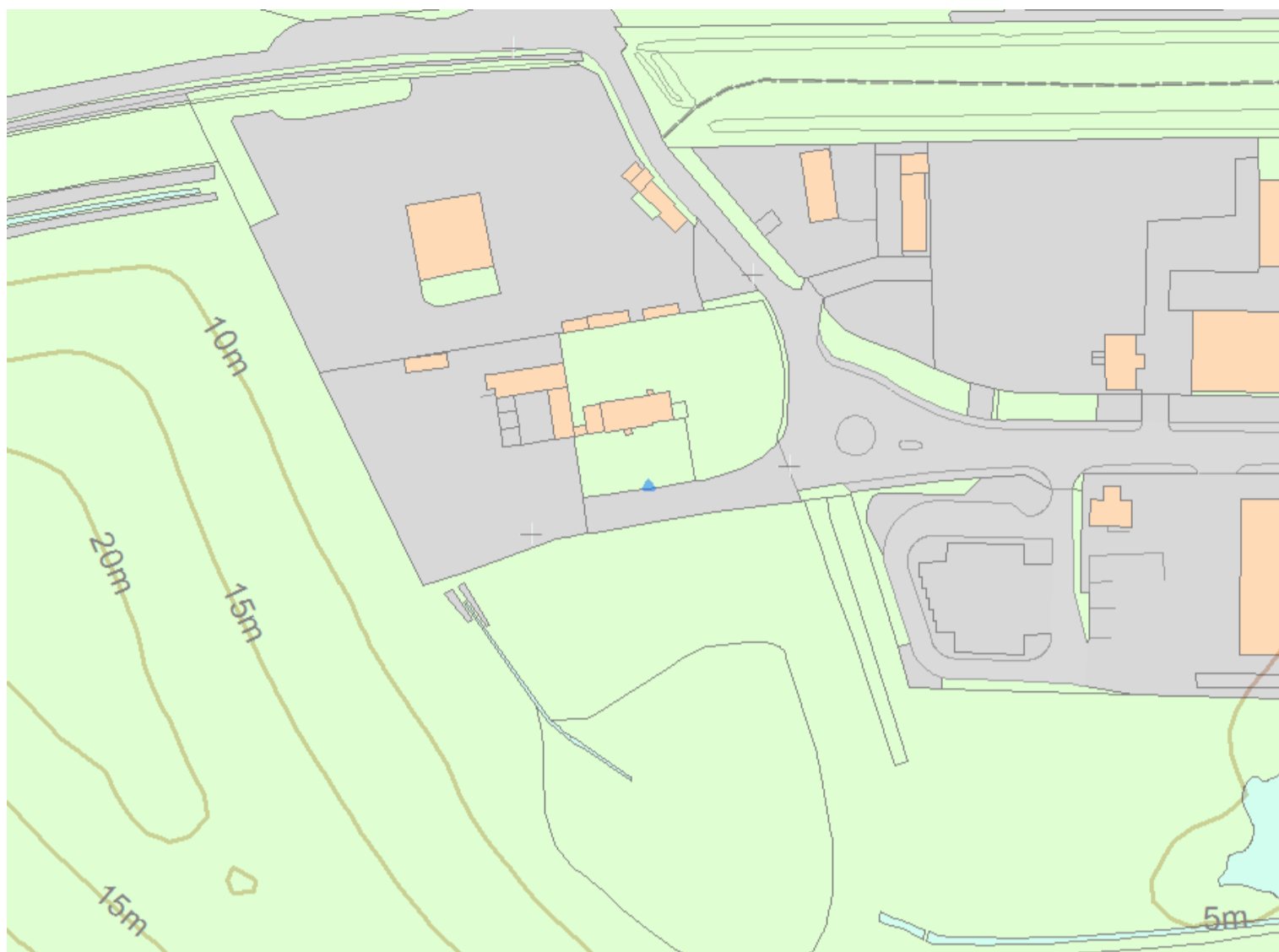
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Legacy System number: **60353**

Legacy System: **LBS**

Legal

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End of official list entry