



# Heritage Representation

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Lower Thames  
Crossing: Whitecroft's  
Farmhouse (The  
Whitecroft Nursing  
Home)

On Behalf of: Runwood  
Homes Senior Living

July 2023 | Project Ref 8190A



Project Number: 8190A

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# 1. Introduction

- 1.1** This Representation has been prepared by HCUK Group on behalf of Runwood Senior Living and concerns the impact of the proposed Lower Thames Crossing at Grays, Essex on the significance of The Whitecroft, a grade II listed building and in use as a care home (henceforth referred to as “the Site”).
- 1.2** I (Lucy Marie Smith) hold the degrees of BA (Hons) in Art and Architectural History and an MSc. in Building Conservation. I am a full Member of the Institute of Historic Building Conservation (IHBC) and a Fellow of the RSA (FRSA). I have more than sixteen years of professional experience working with the historic built environment in the private sector.
- 1.3** I am a Board Director of HCUK Group, a company which provides independent heritage, archaeological, landscape and planning consultancy. During my career I have dealt with a wide range of cases involving physical changes to historic structures and development affecting the setting of heritage assets.
- 1.4** My firm is involved in varied work including the effects of housing developments, urban extensions, renewable energy schemes, commercial and industrial developments, and national infrastructure projects.

## Purpose of this Statement

- 1.5** This representation has been prepared to provide an independent view on the potential impact of the proposed Lower Thames Crossing on the significance of the Site. It has been informed by a visit to the Site, undertaken in December 2022, and a desk-based review of the proposals, Cultural Heritage Environmental Statement (ES) along with relevant historical and cartographic evidence.

## 2. Relevant Planning Policy Framework

**2.1** For the purposes of this Representation, it is relevant to set out the key documents that require consideration as part of any assessment involving change to or within the setting of listed buildings.

**2.2** As the scheme is a Nationally Significant Infrastructure Project (NSIP) it was authorised under the Planning Act 2008 removing the requirement for consents under the Planning (Listed Buildings and Conservation Areas) Act 1990 (The 1990 Act). As such, and in line with Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 (SI 2010/305), the decision maker “must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.” This is a broadly comparable duty to s.66 of The Act, 1990.

**2.3** In this case, preservation equates to an absence of harm.<sup>1</sup> Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.<sup>2</sup>

**2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

**2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

*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.*

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<sup>1</sup> South Lakeland v SSE [1992] 2 AC 141.

<sup>2</sup> Conservation Principles, 2008, paragraph 84.

**2.6** Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

**2.7** Paragraphs 5.120 and 5.142 of the National Policy Statement (NPS) for National Networks (2014) interacts with the NPPF and replaces the NPPF in this instance providing applicable guidance for highways NSIPs. Paragraph 5.131 states that “great weight” should be given to an asset’s conservation, whilst paragraph 5.134 notes that where a development proposal leads to “less than substantial harm...this harm should be weighed against the public benefits of the proposals, including securing its optimum viable use.” The Scale of Harm devised by HCUK Group is tabulated at Appendix 1.

## 3. Background and Observations

### Observations on the Cultural Heritage ES Chapter

- 3.1** Paragraph 6.3.72 of the Cultural Heritage ES Chapter (Chapter 6 of the ES) states that “[f]or all heritage assets, including designated assets where less than substantial harm is predicted, the magnitude of impact has the potential to be reduced through mitigation to record the heritage asset to unlock its evidential value and advance the understanding of the past.”
- 3.2** Within Chapter 6 of the ES, table 6.3 sets out the “Assessment criteria for the value of heritage assets.” Row #2 of that table identified “most listed buildings” as being “high” value heritage assets due to their “high importance and rarity, national scale, and limited potential for substitution.” The assessment table has been derived from the Design Manual for Roads and Bridges (DMRB) LA 104 and LA 106. This is a widely accepted document from which assessment tables in most ES chapters are worked up but there is an element of professional judgement typically employed when identifying where within that table the various types of designation should fall. In this case, all listed buildings have been grouped together with Scheduled Monuments, Conservation Areas, grade I and II\* Registered Parks and Gardens, protected wrecks and nationally important non-designated heritage assets.
- 3.3** Accordingly, The Whitecroft falls within the “high” category.
- 3.4** Paragraph 6.3.76 of the ES Chapter makes reference to the National Policy Statement for National Networks (NPSNN). It is relevant that there is no reference to the National Planning Policy Framework (NPPF) and that the NPSNN has been identified as the preferred document to refer to in relation to designated (and non-designated) heritage assets. Paragraph 6.3.76 reads,

*To identify any designated heritage assets, or non-designated heritage assets that are demonstrably of equivalent significance to scheduled monuments that would experience ‘substantial harm’ in NPSNN terms, the following approach has been implemented to convert the impact assessment terminology of DMRB LA 104 (Highways England, 2020b) to correlate with the NPSNN*

*terms, substantial harm or total loss of significance to a designated heritage asset, or asset of equivalent value, is considered to constitute the total loss of value of the heritage asset. Therefore, in the terms used in DMRB LA 104 this would be described as a major adverse impact and large or very large adverse significance of effect. Substantial harm or total loss of value can occur due to a physical impact to a heritage asset or due to changes to the setting of a heritage asset that cause a severe enough reduction in its value. The assessment in Section 6.6 of this chapter identifies whether an effect is significant in EIA terms and whether it constitutes substantial harm or less than substantial harm to a designated, or equivalent value, heritage asset.*

**3.5** The Whitecroft is described at paragraph 6.4.355 as follows,

*The high-value Whitecroft's Farmhouse (LB37) is a Grade II listed building close to the junction of the new road with the A13 and A1089 intersection, adjacent to the Order Limits. The building is a late 18th century two-storey house, built in red brick with a timber frame and single-storey flanking wings. It has original red brick gable-end chimney stacks, a pedimented doorcase with panelled pilasters and sash windows. It holds architectural, aesthetic and historical value as an example of a fine 18th century farmhouse (although it now functions as a care home). The setting is partly formed by its proximity to Stanford Road, the new houses to the rear, but with a surrounding agricultural setting which contributes to its value. The setting has been somewhat eroded by the embanked A13 dual carriageway to the north and the A1089 dual carriageway to the west.*

**3.6** In relation to temporary effects, paragraph 6.6.158 reads,

*The high-value Grade II listed Whitecrofts Farmhouse (LB37), now a care home, is located immediately south of the Order Limits, adjacent to the A1013. The main alignment (A13 junction) and associated earthworks would be constructed immediately to the north and west of the asset, with associated visual and aural disturbance to its setting. The Stanford Road Compound would also be established c. 300m to the south-east of the asset. Overall, construction of the Project is assessed to result in a temporary impact of moderate adverse magnitude and a **moderate adverse** effect, which is assessed as **significant**.*

**3.7** In relation to permanent effects, paragraph 6.6.340 states,



*The high-value Grade II listed Whitecrofts Farmhouse (LB37), now a care home, is located immediately south of the Order Limits, adjacent to the A1013. The main alignment (A13 junction) and associated earthworks would be present immediately to the north and west of the asset, altering the character of the formerly associated agricultural and in these directions and in very close proximity to the asset. Overall, operation of the Project is assessed to result in a permanent impact of moderate adverse magnitude and a **moderate adverse** effect, which is assessed as **significant**.*

### 3.8

Within the final summary tables at page 233 onwards within the ES, the Site is included within Table 6.7 entitled "Cultural heritage significant effects summary table" the relevant extract of which has been copied below,

<b>Impact description (construction)</b>	<b>Value</b>	<b>Impact magnitude</b>	<b>Significance of effect</b>	<b>Significance</b>
Temporary impacts to Grade II listed buildings: Whitecrofts Farmhouse (LB37), Heath Place (LB41), Polwicks (LB48), Walnut Tree Cottage (LB49), Thatched Barn at Whitfields (LB52), Baker Street Windmill (LB57), Whitfields (LB60), Buckland (LB66)	High	Moderate	Moderate adverse	Significant

<b>Impact description (operation)</b>	<b>Value</b>	<b>Impact magnitude</b>	<b>Significance of effect</b>	<b>Significance</b>
Permanent impacts to three Grade II listed buildings: Whitecrofts Farmhouse (LB37), Baker Street Windmill (LB57), Hole Farmhouse (LB153)	High	Moderate	Moderate adverse	Significant

### 3.9

The calibration of harm within the ES Chapter (as quoted above at paragraph 3.4) has placed harm to The Whitecroft within the realms of paragraph 202 of the NPPF, less than substantial harm. The less than substantial harm identified, in this case, still results in a moderate adverse effect to significance, which is significant in EIA terms. In the context of the EIA Regulations, "significant impacts" are taken to be

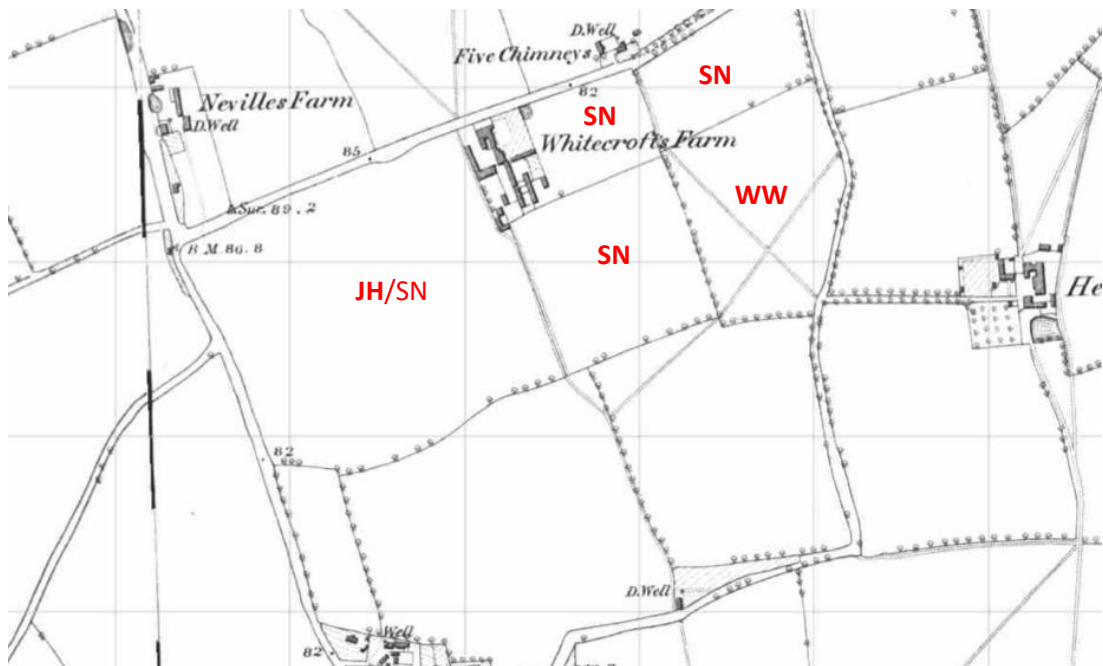
those of moderate or major significance, albeit that appropriate mitigation, where available, should be sought for all impacts significant or not.

**3.10** What the ES Chapter does not do is articulate where the harm identified falls on the scale of less than substantial. As noted at paragraph 2.4, previously, paragraph 18a-018-20190723 of the (online) NPPG makes it clear that it is not just the category of harm (whether paragraph 201 or 202 of the NPPF applies, if at all), but the extent of harm, which may vary, which should also be “clearly articulated.”

## Historic Development

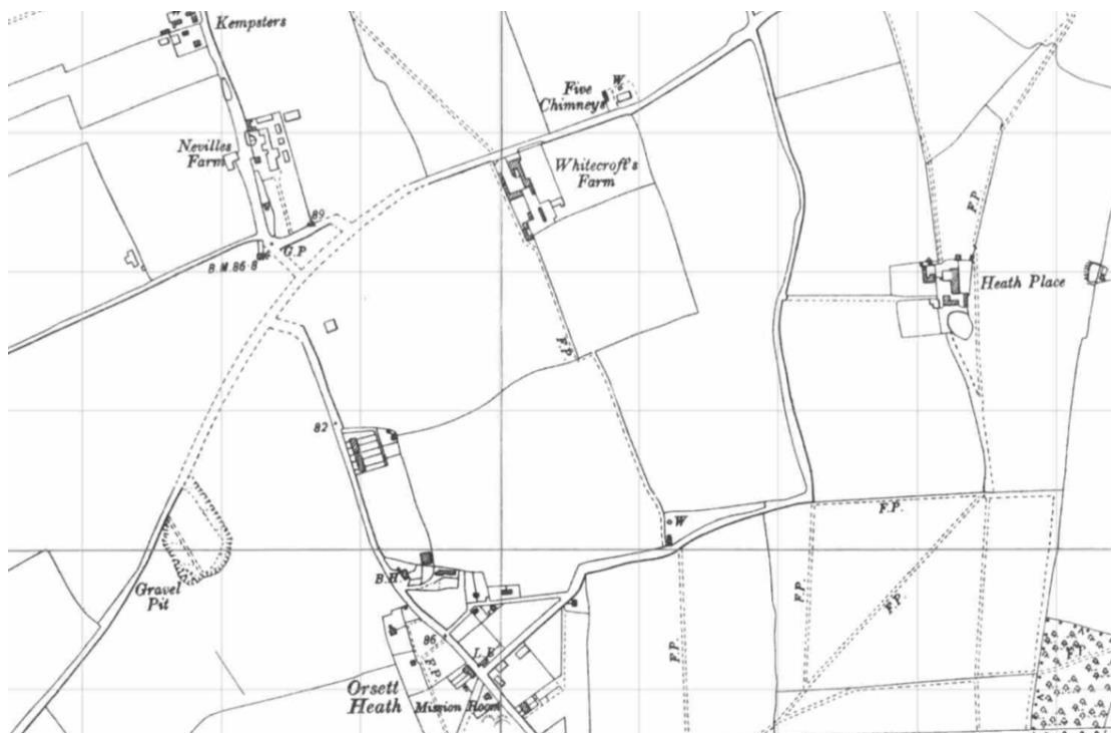
**3.11** The Tithe map of 1839 (not included here) shows that Whitecrofts Farm was owned by a Mr Samuel Newcome (farmer). Newcome is also identified as owning and occupying the parcels of farmland identified by “SN” on the Ordnance Survey (OS) map extract from 1865, below.

**3.12** William Wingfield (a 19<sup>th</sup> century Member of Parliament, who died in 1885) is shown as owning the parcel of land to the south-east of the farmhouse. The land to the west of the farmhouse was owned by a Mr James Hutchins but is occupied by Samuel Newcome.



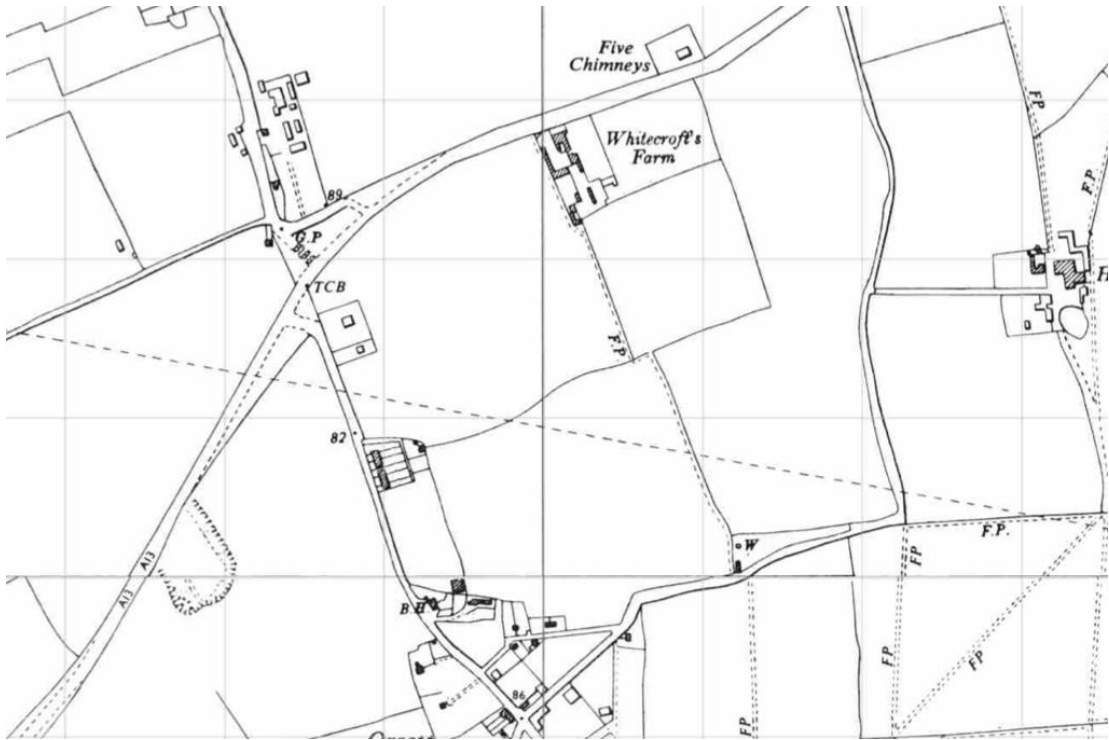
*Ordnance Survey map, 1865*

**3.13** The above is of relevance because it shows that Whitecrofts Farm was owned by a Samuel Newcome in the 19<sup>th</sup> century and he owned, and presumably worked, the parcels of land immediately adjoining the farm buildings to the south and east. The larger parcel of land immediately to the west of the farm buildings was in separate ownership but was “occupied” by Newcome suggesting that this area formed an integral part of the working farm during the early 19<sup>th</sup> century.

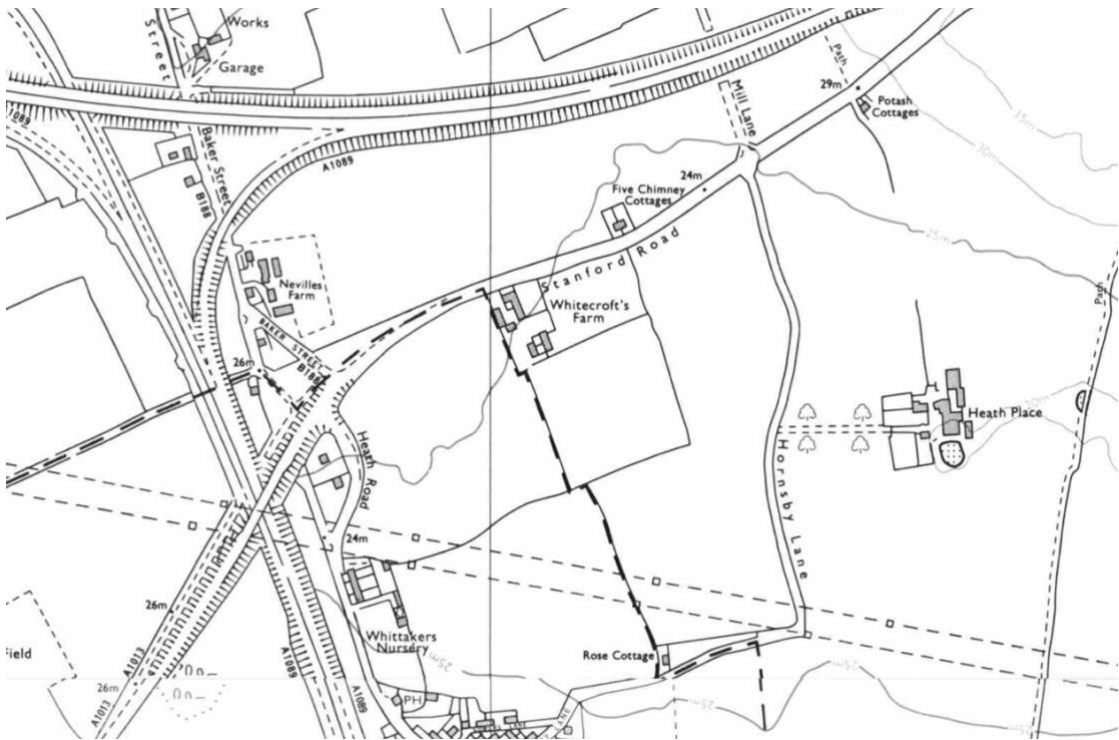


*Ordnance Survey Map, 1938*

**3.14** A review of the historic mapping shows that, aside from the introduction of an entirely new road, the A13, in the late 1970s/early 1980s to the north of the Site, and a widening of the existing Stanford Road, which still runs along the northern boundary to the Site, the immediate setting of Whitecrofts Farmhouse, with open parcels of land to the south, east and west, remain appreciable and contribute to an appreciation of the former use of the Site and the predominantly agricultural character of its surroundings.



Ordnance Survey map. 1954-5



Ordnance Survey map, 1982-6

## 4. Statement of Significance

### Whitecrofts Farmhouse

**4.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

**4.2** Whitecrofts Farmhouse was designated grade II in 1960. The official list entry for the building reads,

*Late C18 house, in red brick and timber-frame, with red plain tile roof. Two storeys, with single storey flanking wings. Three window range, double hung vertical sliding sashes with glazing bars. Three lights to ground floor sashes. Stucco band. Open pedimented doorcase with panelled pilasters, dentils, and urn in centre of pediment. Panelled reveals. Brick eaves cornice, original red brick end chimney stacks. Wings have capped parapets, ball finials, round headed windows. Forecourt with walls and iron railings. Long wing at rear.*

**4.3** There is also a range of converted ancillary buildings to the rear which retain a strong sense of the building's past use and the character of the surrounding land.

**4.4** Whitecrofts is principally of architectural and historic interest and the assessment undertaken for the purposes of this Representation does not disagree with the description of the building's significance as included within the ES Chapter and copied at paragraph 3.5 previously.

#### *Contribution of setting to significance*

**4.5** The ES chapter briefly describes the setting of Whitecrofts Farm as being "partly formed by its proximity to Stanford Road, the new houses to the rear, but with a surrounding agricultural setting which contributes to its value. The setting has been somewhat eroded by the embanked A13 dual carriageway to the north and the

A1089 dual carriageway to the west.” Although I do not disagree with this assessment, I am not certain what is meant by “new houses to the rear” – it is unclear what development is being referred to here - and, insofar as the “surrounding agricultural setting” contributes to the value of the building, I am of the view that this contribution has not been considered in sufficient detail and has been underplayed.

- 4.6** Chapter 3 of this representation includes a map regression and comments on the historic ownership and extent of land associated with the original farm development. Although the introduction of the A13 (north) and the A1089 dual carriageway to the west have indeed had a notable impact, they have impacted on land that, historically, has a lesser connection to/relationship with the Site (visually the connection is not as tangible and this land was also not, as far as research has identified) directly associated with, through ownership or use, Whitecrofts Farm).
- 4.7** Whilst the significance of Whitecrofts, as a designated heritage asset, is principally wrapped up in the physical fabric of the building itself, the immediately adjacent fields, particularly to the south, east and west (identified below, based on the historic map regression and observations made on Site) do contribute something to that significance. I am of the view that they contribute more to the building’s significance in fact than the land to the north, in the location of the A13, or indeed heading west from the A1089 ever have.
- 4.8** The introduction of the A13 and the dual carriageway to the west of the Site in the 1980s slightly reduced the significance of Whitecrofts, through a negative impact on a positively contributing aspect of its setting, which resulted in urbanisation and a dilution of the agricultural character. Assessed against today’s criteria that change could reasonably have been assessed to bring about a harm to the building’s significance within the realms of paragraph 202 of the NPPF (less than substantial) but at a low level and taking into consideration the lesser contribution of that land to the significance of Whitecrofts than the land in question here.
- 4.9** The parcels of land immediately to the south and west of Whitecrofts, which survive today, are the last vestiges of that original extent of the farm and relationship of that land to the original farmhouse, all historically owned and/or managed by Samuel Newsome in the 19<sup>th</sup> century. I am of the view that because of this, these

areas of land have a greater contribution to make - they are all that survives of the listed building's original setting.

## 5. Impact Assessment

**5.1** This chapter of the report assesses the impact of the proposed development on Whitecrofts, including effects on the setting of that asset. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in Appendix 2.

**5.2** Paragraph 18a-013-20190723 of the NPPG comments on setting as follows,

*[...] The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.*

*When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

**5.3** The above is worthy of reference particularly with respect to the second paragraph which notes that “developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.” Taking aside the history of The Whitecroft for a moment, its current use as a nursing home has ensured the building has remained well-maintained and in a sympathetic use. Its current setting remains, by and large, an attractive one, particularly appealing to prospective and current care home residents.

**5.4** The introduction of the Lower Thames Crossing in this location, combined with the impact that the A13 and other late 20<sup>th</sup> century infrastructure has already had on the building’s setting, will further compromise the quality of the Site to an extent where it could quite feasibly become undesirable in this or any other residential use in the future. The quality of life of the residents would be diminished and there is a greater risk that the listed building will not realistically be able to remain in an appropriate, sensitive, and sympathetic use.



**5.5** The construction of the Lower Thames Crossing, as proposed within close proximity to The Whitecroft, cuts through the only original portion of land that survives associated with the Whitecrofts farmhouse and associated farm development. The extensive changes that have already occurred within the immediate surroundings of this listed building (including the construction of the A13) diminished the quality and reduced the extent of the building's original setting and, resultantly, the amount that setting contributed to the building's significance. The vestiges of the original setting that do survive today are of greater importance now because they are all that remains as evidence to the former agricultural use of The Whitecroft as a farmhouse and the original agricultural nature of the immediate surroundings.

**5.6** I note that the recent Secretary of State decision relating to Edith Summerskill House, London (ref: APP/H5390/V/21/3277137) wherein the Secretary of State endorsed the following observations from Inspector Griffiths as regards to the extent of harm where a development only affects the setting of a designated heritage asset:

*12.49 The point was not made in these terms at the Inquiry but for my part I see little between the decision of the High Court in Bedford, the Court of Appeal in Bramshill, and the PPG. Essentially, substantial harm is set at a high bar, such that a good deal (or all) of the significance of a designated heritage asset would have to be removed for it to be reached. That means that the range for a finding of less than substantial harm is very wide indeed, from a harmful impact that is hardly material, to something just below that high bar.*

*12.50 In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, then it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.*

**5.7** The proposed section of the Lower Thames Crossing, which will cut across what remains of the original setting of The Whitecroft, will further decrease the contribution made by setting to the significance of the listed building. The surviving setting will be diminished to a point where the contribution of the residual elements

will be, at most, tiny. The existing arrangement, the baseline, remains of particular importance for the reasons set out previously at paragraph 5.5 and the direct impact of the Lower Thames Crossing on that remaining setting will all but remove the surviving contribution to the significance since the construction of the A13.

**5.8** Although I acknowledge that this impact does not result in substantial harm to significance, I am of the view that the harm derived from scheme (particularly given the nature of the change and the scale of it) will indeed push the level of harm, in this particular case, towards the top end of the scale of less than substantial harm (paragraph 202 of the NPPF and paragraph 5.134 of the NPS).

**5.9** The proposed mitigation, which includes the elevated and landscaped “bund” to create a visual buffer between The Whitecroft and the relevant portion of the Lower Thames Crossing, does not outweigh that high level of less than substantial harm identified within this assessment. The bund will fundamentally change the outlook, character and topography of an important element of the listed building’s original setting, fundamentally and irreversibly altering its relationship to that land and further harming the significance of the building as a result.

## 6. Conclusions

- 6.1** This representation has been prepared to specifically assess the impact of the Lower Thames Crossing on the setting of The Whitecroft (historically referred to as Whitecrofts Farmhouse), a grade II listed building.
- 6.2** This assessment concludes that the introduction of the Lower Thames Crossing within such a close proximity to this listed building brings about a high level of less than substantial harm in terms of the NPPF. The significance of the listed building itself is principally derived from its fabric but the setting that remains, and still contributes to that significance, represents the last vestiges of the original land farmed and/or owned by the same person in the early 19<sup>th</sup> century.
- 6.3** The proximity of the infrastructure associated with the introduction of the Lower Thames Crossing to The Whitecroft, along with the direct impact the development would have on its setting (further eroding it to the point that it no longer contributes to the significance) should not be considered acceptable. The value of that land is greater now that it is all that remains of the original extent of Whitecrofts Farm and the last element of the Site's agricultural surroundings that survives in a broadly original arrangement.
- 6.4** Combined with intervisibility, the increased traffic and associated noise, all of these elements result in a significant (in EIA terms) impact that has not been adequately mitigated and results in harm to the significance of The Whitecroft falling within the top end of paragraph 202 of NPPF.

# Appendix 1

## *Scale of Harm (HCUK, 2019)*

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).<sup>3</sup>

<b>Scale of Harm</b>	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

<sup>3</sup> See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

## Appendix 2

### *GPA3 Assessment: Historic England’s guidance on setting*

In assessing the effect of the Lower Thames Crossing on the setting and significance of The Whitecroft, a grade III listed building, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<i>Relevant Considerations</i>	<b>Whitecrofts Farmhouse, GII</b>
<i>Proximity of the development to the asset</i>	Immediately to the north, west and south-west.
<i>Proximity in relation to topography and watercourses</i>	The crossing will cut diagonally across the land immediately to the south-west of the Site.
<i>Position of development in relation to key views</i>	Kinetic views towards the Site are possible from Heath Road and these will be removed through the introduction of the development which will be built up in this area.
<i>Orientation of the development</i>	N/A
<i>Prominence, dominance and conspicuousness</i>	Very prominent and dominant with the wider setting of the listed building.
<i>Competition with or distraction from the asset</i>	The new road and associated infrastructure will undoubtedly result in a notable distraction in views towards/of the listed building.
<i>Dimensions, scale, massing, proportions</i>	N/A
<i>Visual permeability</i>	There will be no visual permeability. The land in this particular area is relatively flat and views are quite extensive. These views will be notably altered or removed entirely.
<i>Materials and design</i>	N/A
<i>Diurnal or seasonal change</i>	N/A
<i>Change to built surroundings and spaces</i>	Notable change through the introduction of a substantial new road and associated infrastructures within an area that retains a strong agricultural feel, particularly south of the A13.

*Change to skyline, silhouette*

XXXXXX

*Change to general character*

XXXXXX

## *Standard Sources*

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

[www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

<http://magic.defra.gov.uk>

[www.history.ac.uk/victoria-county-history](http://www.history.ac.uk/victoria-county-history)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

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