



Mr ROLAND MILLS
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Direct Dial: 0207 973 3655

Our ref: L01146610

26 February 2020

*LISTED BUILDING
CONSENT APPLICATION*

Dear Mr MILLS

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

**NEWTOWN RAILWAY WORKS, NEWTOWN ROAD, ASHFORD, KENT, TN24 0PN
Application Nos 19/01694/AS & 19/01476/AS**

← PLANNING APPLICATION

Thank you for your letters of 20 December 2019 and 11 February 2020 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

Historic England has engaged in detailed and constructive pre-application negotiations for the comprehensive redevelopment of New Town Works Ashford prior to the submission of this application and recognises the exceptionally challenging circumstances of this site. The proposal before us would entail a high level of harm to the significance of two grade II listed buildings, the engine shed and locomotive workshop and we consider this to be towards the high end of less than substantial for the latter. We think the supporting information is capable of demonstrating that the harm cannot be avoided altogether and are satisfied that efforts to minimise harm through sensitive design achieve this objective.

Your Council will need to weigh the harm against the public (including heritage) benefits of this proposal in the manner described in paragraph 196 of the National Planning Policy Framework (NPPF). We consider securing the long-term future of vulnerable designated heritage is a heritage benefit to account for in the weighing exercise and suggest that further benefits in the form of an interpretation strategy outlining the site's railway heritage and a detailed landscape proposal which draws on the site's existing industrial archaeology (e.g. the turn table in the locomotive Workshop) are also heritage benefits which could apply.



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In reaching a decision on this proposal your Council will also need to be mindful of NPPF objectives to conserve designated heritage in a manner appropriate to their significance so that they can be enjoyed by for their contribution to the quality of life of existing and future generations and the need to give great weight to the conservation of designated heritage.

Historic England Advice

This advice represents Historic England's joint response to planning applications 19/01476/AS and 19/01694/AS for the redevelopment of the New Town Railway Works in Ashford town centre to film studios, workshops, a media village, a 120 bed hotel, conference use, commercial space and 302 residential units. This is a major application for significant change to a historic railway works of which only 5 buildings survive, all listed grade II. The scale of the proposed 20 storey hotel also has the potential to impact on designated heritage outwith the site. Our advice will focus on those buildings where the greatest level of change is proposed thus triggering our statutory engagement (the Engine Shed and locomotive Workshop) and we therefore also recommend seeking advice from your own conservation staff on the wider implications of the proposal. This advice follows constructive pre-application negotiations with the developer and your Council and we hope it is helpful as you reach a view on this application.

Ashford Railway Works and the significance of the grade II locomotive Workshop and Engine Shed

Following an act of parliament in 1836 for a railway line between Dover and London, the construction of the South Eastern Railway Company line was complete by 1843. Ashford was chosen as the location for a station which served as the half-way point between London and Dover and a junction point to the Canterbury and Isle of Thanet Branch. Shortly after its construction in 1847 a railway works, known as New Town Works was built.

The railway works at Ashford was built for the repair and construction of locomotives, carriages and wagons. Railway works were large industrial sites and what survives at Ashford is a remnant of a much more extensive group of buildings. Despite this, the survival of the locomotive workshop, an engine shed, a paint store, an acetylene store and a gatehouse, along with New Town, a planned settlement for railway workers, gives a tangible insight into the scale of the works and their industrial character.

One of the earliest surviving buildings is the grade II locomotive workshop which was built in three major phases beginning at its western end in 1847 and extending



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eastwards until the last major addition in 1912. It consists of three parallel volumes with a central traversing crane which serviced, through an arcade, a maintenance and erecting shop on its northern side and associated functions including a smithy, boiler shop and tender shop to the south. It was designed to be flexible and so its gradual extension and the relocation of functions within the building over the course of the 19th century did not fundamentally alter its essential form with the exception of the roof which is post WWII.

The locomotive workshop is significant as one of the best known surviving examples of its type. Of its multiple phases, the earliest is of greatest significance for its rarity as an early example of a locomotive workshop. This and the building's distinctive form of three parallel volumes are of high significance. The traversing crane which survives also has significance, despite its later date, as it continues to illustrate how the building was used. The roof is of lower significance owing to its late date, though its pitched form which echoes the historic roof contributes to our understanding of the building's historic appearance. A surviving section of original roof in the iron store is, on the other hand, of higher significance as the only evidence of the building's original roof construction.

The Engine Shed was built c1860 and derives significance from its architectural value as a well-designed and robust piece of functional Victorian architecture with recessed brick bays and attractive round headed arched window openings. Internally little visibly survives to illustrate its former use, though we note the archaeological potential for evidence of the railway tracks which once ran the length of the building. A later extension of c1910 and a single storey addition on the south elevation, which has been seriously compromised by insensitive alterations, contribute less to the building's significance than the primary phase. The 20th century roof also contributes less to significance.

As noted above, buildings associated with the railways works were once far more extensive than today (those not listed having been demolished in the 1980's). It is therefore more difficult to understand the historic functional relationships between the surviving railway buildings though some association through the architectural language of individual buildings and their historic use does provide a limited insight into the former historic character of the site. Parts of the site which were cleared in the 1980's and contain no upstanding evidence of the former railway works make a very limited contribution to the significance of designated heritage as the land does not help explain or tell the story of the industrial site and its process, though it does permit a number of views towards individual assets.

The Proposal and its impact on the significance of listed buildings



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The greatest level of change is proposed to the locomotive workshop where a combination of demolition and alteration to the building's envelope and internal spaces will harm both its architectural and historic values. Harm to the building's architectural qualities arises from opening up blind openings, which in places are primary and thus a component of the building's historic appearance, and from the scale and materiality of the roof top extension which would be at odds with the lower pitched historic roof form. Horizontal and in places vertical subdivision, will also make it more difficult to appreciate the layout and volumes of internal spaces. The loss of some historic fixtures (e.g. later lifting cranes) also causes harm as these help interpret historic use and in places contribute to the building's strongly industrial appearance. Despite careful design by the architects, the inevitable domestication of a building designed for industrial uses also harms its historic character. Overall we conclude that the harm is towards the top end of less than substantial.

Major changes to the grade II Engine Shed are also proposed, the most harmful of which is a roof top extension. We think the harm here is chiefly caused by the disproportionately tall proportions of the rooftop extension and the awkward relationship this would consequently have with the existing brick elevation. Some harm also arises from the subdivision of this building, which appears to have been a single large volume historically while additional (albeit lower) levels of harm to the building's architectural and historic values arise from the replacement of some historic windows with new door openings. We conclude that the harm to heritage significance is less than substantial in NPPF terms.

We also note the Victorian Society's conclusion that the combination of change to the above listed buildings and development within their setting amounts to substantial harm to both listed buildings. While we agree with the Society about high levels of harm arising from the degree of change, we do not agree that development within the setting tips the balance of harm to substantial on the basis that the site was historically heavily developed with numerous buildings to the south of both listed buildings. We accept the proposed development is of a nature and scale which exceeds what was here historically, but we do not think this in itself leads to substantial harm because the development does not harm appreciation of the historic link between the Engine Shed and locomotive workshop and would not, in our view, compromise a sense of the locomotive workshop's dominance on the site, both now and historically.

Your Council will also need to consider whether the scale of the 20 storey tower will impact on the significance of other designated heritage including the grade I listed Church of St Mary whose prominent spire serves as a focal point for the town in long views. We understand long views were assessed within the LVIA but cannot see wireframes depicting key long views of Ashford on your website so are unable to provide a view on this aspect of the proposal.



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Policy and Historic England's Position and Recommendation

Change affecting the historic environment is governed by Section 16 of the National Planning Policy Framework (NPPF) which notes that heritage assets are “an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

The framework goes on to require that harm to designated heritage should be avoided or minimised and that remaining harm should have clear and convincing justification (Paragraphs 190 and 194). In our view, the applicants have made a case to demonstrate the requirements of paragraphs 190 and 194 are capable of being met. They have achieved this in several ways.

Firstly, the proposals in this application are the culmination of long negotiations which explored different options to secure this highly challenging and vulnerable group of heritage assets. A viability report submitted to support the application establishes that a development without rooftop extensions is not viable and we suggest that this could stand as evidence that the harmful impacts of rooftop additions cannot be avoided altogether. The harm to heritage significance has also been minimised through the design of new interventions, including the roof top additions which have been refined in the lifetime of this application to reduce overt references to a domestic use in order to sustain the site's industrial character. The height of the Engine Shed rooftop extension has also been reduced by 1.4m to help harmonise the scale of this with the brick elevations. Work has also been carried out to identify and retain, where feasible, surviving historic features in the locomotive workshop including historic joinery, evidence of window and door details and other features including chimneys. In the Engine Shed, the design of new or replacement openings carefully references historic precedents and where feasible, existing historic windows will be retained and refurbished. All of this helps to minimise harm to heritage significance.

In reaching a decision on this proposal, your Council will also need to weigh the harm against the public (including heritage) benefits in the manner described in paragraph 196. We consider securing the future of designated heritage is a benefit applicable to the weighing exercise. Other heritage benefits could include a heritage interpretation strategy (secured by condition) which helps tell the story of Ashford's railway heritage and its connection to New Town and local populations. Sustaining the industrial archaeology of the site and interpreting this where feasible through a detailed landscape proposal, could also be a heritage benefit applicable to the weighing exercise and could be securable by condition.



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Historic England

In conclusion, Historic England does not object to this proposal on heritage grounds and consider that it is capable of meeting the requirements of paragraphs 190, 194 and 196. If your Council is minded to approve this application, we recommend securing the heritage benefit of conserved railway heritage up front and early in the delivery of the overall scheme and suggest this could be agreed via a legal agreement. A number of detailed conditions will be required for the listed building consent to control the fine detail of the proposal. We are content to defer to the advice of your Conservation Officers in respect of the wording for these conditions, but would be pleased to offer advice if helpful.

In determining these applications you should also bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or the setting or any features of special architectural or historic interest which they possess.

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

Yours sincerely

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cc: Sarah Dee, Jeremy Fazzalano

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