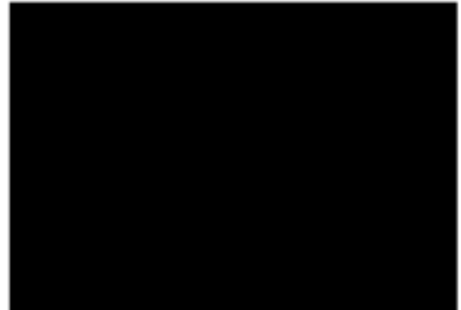


Amanda Cue
Gravesham Borough Council
Sent by email



15th April 2026

Dear Sir/Madam

APPLICATION 20260321 - LAND ADJACENT TO 35 CLARENCE PLACE

We wish to object to this application.

Our grounds for objection rely on the recent appeal decision, Appeal Ref: APP/K2230/W/25/3368863, dated 24 October 2025 which refused a similar application on the same site.

The main issue is whether the proposal would preserve or enhance the character or appearance of the Windmill Hill Conservation Area (CA), a designated heritage asset. Set out below in bold are the reasons given by the inspector for his decision to refuse the previous application and below each point we have set out why we believe this application should be refused as it has failed to address these points.

THE DESIGN

“Adjacent to the east of the appeal site is 32-35 Clarence Place, which are residential properties of a paired villa development type. I agree that 32-35 Clarence Place make a positive contribution to the special interest of the CA, because they reinforce the local distinctiveness of built form in this part of the CA.”

“The appeal proposal would result in a four-storey building attached to the side elevation of No 35 which is also a four-storey building. The main part of the proposed building would have both an eaves and ridge height that would be taller than the main part of No 35. Whilst it would not be significantly taller, the difference in height would appear at odds with the established paired villa that it would be attached to.”

“The width of the proposal would cause visual unbalance, given it would alter and erode the appearance and layout of the established paired villa development type. The side elevation of the proposed building would become a more dominant feature in the streetscene than the side elevation of No 35 in the current circumstances, given the removal of the vegetation on the appeal site.”

Given that both pairs of villas make a positive contribution to the CA the unbalancing of them by the addition of a single dwelling, a bay window, railings from the 20th Century when the Veterans Hall was built, will not make a positive contribution to the CA. The reduction in height is not significant when set against the Planning Inspector's

comments. There is nothing in this new proposal that mitigates the objections set out above by the inspector when he refused the previous proposal on this site. It is still a proposal for a modern appendage tucked into a gap alongside paired villas, which the applicant for some reason now refers to as a terrace. The side wall becomes more of an issue as there will be nothing to soften it. Attempts to mimic detailing from the adjacent villas and other local buildings to the proposed development were anticipated by the Inspector when he wrote:

“The replication of some historic features which are common in the CA, such as the bay windows and the lower side projections, would not overcome my concerns about the overall proposed design.”

THE SETTING

The Windmill Hill Conservation Area Appraisal 2009 identifies the character of the CA as a residential suburb, containing a large number of buildings of architectural interest with open spaces that form a green and open character with mature individual trees and tree groups present. The Inspector's report comments:

“The open landscaped grounds around the Veteran's Club, including the appeal site, contributes to the pleasant verdant open and spacious character of the CA.”

“Whilst some of the landscaped area would remain, in particular to the front, rear and west of the Veteran's Club, the provision of a building on part of the open and undeveloped space which provides a break in built form between 35 Clarence Place and the Veteran's Club would harmfully erode the open, verdant and spacious character of this part of the CA.”

“I do not find that the site is underutilised given it contributes in a positive way to the significance of the CA.”

It is worth stating again that the application site is without question one of the spacious green spaces that the Inspector refers to. It is a point specifically mentioned in the Conservation Area Appraisal about the Southside of Clarence Place. The CA states “The common built form is of the paired villas, with interesting spaces between, rather than an unbroken building line.” The new building would clearly create an unbroken line although the applicant seems to suggest that the tiny gap between the new building and the Veterans Hall would still allow views of the Hill beyond which is patently not the case.

“Whilst some vegetation would be retained, I am not satisfied that it would be possible to provide a similar level of vegetative screening given the proposed positioning of the building in close proximity to the Veteran's Club.”

The proposed building would still be in the same very close proximity to the Veteran's Club as the previous proposal and screening is impossible.

The excavation of a large amount of soil from the front of the site would also have a significant effect on the remaining tree on the Veteran's Club's land. Based on the information provided within the arborists survey as produced by Canopy Consultancy there is a risk to tree T6 Prunus Kanzan (flowering cherry). It has a trunk diameter of 620mm. Based on the BS5837 2012 this will give a radius for the root protection area of 7.44 metres (12 x diameter). Having reviewed the applicant's proposals, we have been

unable to identify the extents of tree protection or the extents of the root zone that would be impacted by the proposed reduced ground levels as intended by the proposed building. The depth of excavation being a minimum of 1 metre, plus any retaining wall foundations that would be required along the east of the proposed garden/ boundary wall of the proposed dwelling. This could result in approximate loss of one third of the root zone which would have a detrimental impact on the health and stability of this tree, thus reducing even the small amount of screening that would remain should the development go ahead.

In its Heritage Impact Statement (para 3.5 page 20), the applicant notes that there were six comments made by the Inspector in his document refusing the appeal that needed to be addressed by this proposal. Namely: height, width, appearance and layout of the established paired villas, the loss of the green space, the loss of boundary treatment, increasing the visibility of the side elevation.

However, in the Planning Statement (page 10) the applicant states ***“the scheme has been significantly altered to overcome the Inspectors sole reason for refusal in that it is a storey less in height and is set back further with more contextual architectural details.”*** This application clearly fails to address the importance placed by the Inspector of the loss of the green space. In his report he states that ***“the provision of a building on part of the open and undeveloped space which provides a break in built form between 35 Clarence Place and the Veteran’s Club would harmfully erode the open, verdant and spacious character of this part of the CA.”***

CONCLUSION

“I find that the proposal would not preserve or enhance the character or appearance of the CA.”

“Taking into consideration the great weight that should be given to the heritage assets conservation, the public benefits are limited and do not outweigh the less than substantial harm that would be caused to the significance of the heritage asset. As such, clear and convincing justification for this harm has not been identified.”

There is nothing in this new, mostly unchanged application that deals with the objections raised by the Planning Inspector in October 2025 and his conclusion that there will be harm caused by this proposal and there has been no justification provided by the applicant to justify this harm.

Yours faithfully,

