

157 MILTON ROAD, GRAVESEND
KENT, DA12 2RG

HERITAGE STATEMENT



HUL Ref: 2304.1267 | 09 February 2024

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REVISION SCHEDULE					
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2					



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1.0 INTRODUCTION

- 1.1. This Heritage Statement has been produced by **heritage** unlimited to support a planning application at 157 Milton Road, for conversion of the unoccupied property to four flats with associated internal works.
- 1.2. The current application follows a previous refused application (20231004), the feedback from which has been used to create a revised scheme reduced from six to four proposed dwellings, thereby also further reducing the need for subdivision of existing rooms.
- 1.3. The current proposal also results from a thorough research and design process where the services of Heritage Unlimited were engaged to conduct assessments of morphology, fabric, and potential impact to the building. Consequently, the submitted designs are the result of a heritage-led approach which accounts for, and preserves, the special interest of the listed building.
- 1.4. 157 Milton Road (formerly nos.157&158) is a grade II listed building, designated in 1952. The property is also located within the King Street Conservation Area.
- 1.5. Listed buildings and Conservation Areas are defined by the National Planning Policy Framework (2023) (NPPF) as designated heritage assets. As the proposed development affects one or more heritage assets, paragraph 200 of the NPPF requires a Heritage Statement to support a planning application. This document has been prepared in accordance with the requirements of the NPPF.
- 1.6. The purpose of a Heritage Statement is to identify the significance of any heritage asset affected by the proposed development, the impact the proposed development will have upon the identified significance and justification for the proposed development. The Heritage Statement also needs to assess the proposed work in accordance with the statutory tests provided in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.7. This Heritage Statement should be read in conjunction with architectural plans and other supporting documents, which form this planning application.
- 1.8. This report has been compiled by Shaun Moger MSc Historic Building Cons and Paul Clarke BA (Hons) Arch Cons and is based on desk-based research and a site visit carried out in July 2023.

2.0 SITE LOCATION AND CONTEXT

- 2.1. 157 Milton Road is located on the south side of Milton Road, opposite the junction with Berkley Row.
- 2.2. The property is towards the centre of a row of historic properties, both listed and locally listed, which form a continuous frontage. Adjoining the site to the west, on the corner of Parrock Street, is the Roman Catholic Church of St John the Evangelist. These, along with The Grapes Pub to the east corner of the block, are grade II listed buildings, whilst nos.154-156 are buildings of local interest. The church hall is located approximately 10m southeast of the rear of the property at the centre of the island block and includes a hardstanding parking area to its west side, accessed via a carriage arch beneath no.1 Edwin Street. Another grade II listed building, The New Inn, is located approximately 40m northwest of the site on the corner of Milton Road, King Street, and Queen Street, however this was destroyed by a fire in May 2022 and remains in a ruined condition.
- 2.3. No impact will be had upon the neighbouring assets due to the proposed works being internal only. For this reason, their settings and special interests will be preserved with regards to the statutory test provided by section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and they will not be assessed in detail in later sections of this report.
- 2.4. 157 Milton Road, formerly nos.157 and 158, is a three storey (plus semi-basement) property of ashlar stone construction. The easternmost bay of the principal north elevation projects slightly and is flanked by pilasters, whilst the remaining three bays form a symmetrical frontage with a cast iron first floor balcony. The windows of the property are glazing bar sashes with moulded surrounds.
- 2.5. The ground floor is commercial, split into two units with modern shopfronts. The first and second floors, accessed via a door to the east end of the elevation, leading to a corridor and stairs, were in use as a restaurant since c.1972. Living space, including three bedrooms, are also found to the second floor and above mezzanine level.
- 2.6. As the development forms part of an island block, bounded by Milton Road to the north, Parrock Street to the west, Edwin Street to the east, and Saddington Street to the south, the rear of no.157 cannot be seen from the public realm. This is further assisted by the railway line passing in an east-west cutting at the southern end of the block.





Fig.1: Site location shown in red.



Fig.2: The row of buildings on the south side of Milton Road, no.157 marked by the arrow. The Grapes PH (left), no.157, and the Church of St John are listed buildings whilst the remaining nos.154-156 (consecutive) are buildings of local interest.

3.0 IDENTIFIED HERITAGE ASSETS

- 3.1. The National Planning Policy Framework (NPPF) requires that all heritage assets affected by the proposed development are identified and their significance, which includes setting, are described. The level of 'harm' the proposed works will have to the identified heritage assets also needs to be determined within the context of a Heritage Statement.
- 3.2. As identified in the introduction, the site is a grade II listed building and also located within the King Street Conservation Area.

157 Milton Road

- 3.3. 157 Milton Road, listed under the name 158, MILTON ROAD, 157, MILTON ROAD, was designated on 23rd January 1952, and is a grade II listed building. A description of the property (at the time of listing) can be found in the appendix **HS1**. The following appendices **HS2** and **HS3** also document the morphology of the building and provide a detailed fabric assessment on a room-by-room basis.
- 3.4. The listing description dates the buildings (nos.157 & 158) to c.1840 and this is supported in that the 1840 Tithe map shows the buildings in situ with the church on the corner (St John's Roman Catholic Church), which was built in 1834. The properties to the west of no.157 are not shown on the Tithe map. The building is shown as two evenly sized properties on the Tithe map with both owned by William B Little according to the accompanying Tithe return. No.157 Milton Rd was occupied by James Grierson whilst no.158 was unoccupied.
- 3.5. From c.1860, the property became a convent and no.158 was occupied by the Sisters of Mercy religious order who taught in to the adjoining single-classroom school before acquiring no.157 on lease in 1876 and building an additional room above the existing one. Between 1923 and 1933, the building was extended to the rear, possibly to provide a chapel for the Sisters of Mercy. Whilst no information relating to this addition could be found, the addition is early to mid-20th century in date and contributes to the special interest and significance of the building.
- 3.6. The ground floor was converted for commercial use with modern shopfronts c.1952. From c.1972 until recently, the first and second floor of the property was used as a restaurant whilst various business occupied the two modern shops to the ground floor.





Fig.3: The principal north elevation of the property, seen from Milton Road.



Fig.4: Historic photo c.1900, showing the property (left) prior to the conversion of the ground floor for commercial use c.1952.



Fig.5: The stairs from the ground floor front entrance to the first floor. The lower section dates to c.1952 as part of the works to convert the ground floor to shops. The upper section is thought to be in its original position but altered around the same time.



Fig.6: The first floor restaurant seating area to the rear of the buildings (room 7 of fabric assessment, **HS3**) which includes incongruous modern enclosed stairs to the ground floor.



Fig.7: Seating area to the front of the building (room 2 of **HS3**).



Fig.8: The adjoining first floor kitchen area to the front of the building (room 10).



Fig.9: Cornice with historic context in the first floor kitchen (room 10).



Fig.10: Modern first floor toilets (room 6).



Fig.11: The chapel to the rear of the building (room 18), constructed at some point between 1907-32.



Fig.12: The former balcony to the chapel, now the mezzanine bedroom (room 25) with tracery window, barrel vaulted ceiling, and modern partition wall (left) to form the room.



Fig.13: The early/mid-20th century stairs between the chapel levels (room 20 of **HS3**). The windows to the left are into the lightwell (5) and the upper doorway leads to the mezzanine bedroom (room 25).



Fig.14: The second floor bedroom (room 24) with original window and skirting boards and modern ceiling tiles and cornice. The short flight of stairs to the left (now blocked) previously gave access to the former adjacent school, evidence of their past association.



Fig.15: The second floor restaurant seating area (room 13).

Historic Map Regression



Fig.16: 1840 Tithe Map, showing nos.157 and 158 as two evenly sized properties under the same ownership.

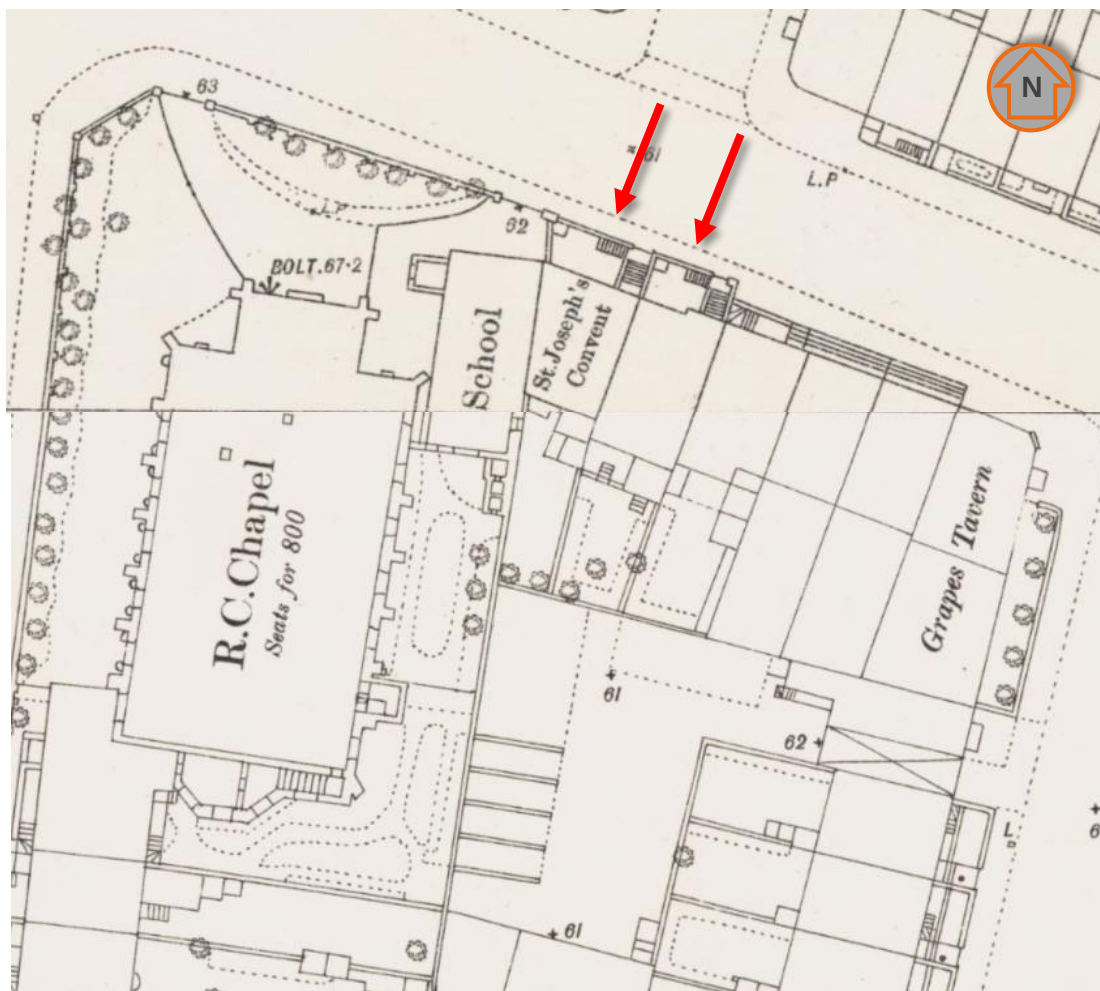


Fig.17: Spliced Ordnance Survey maps, surveyed 1863, published 1866. At this time the Sisters of Mercy occupied no.158 but would not acquire no.157 until 1876.



Fig.18: Ordnance Survey map, revised 1907, published 1909, showing the two properties combined into one.



Fig.19: Ordnance Survey map, revised 1932, published 1933, showing a rear extension.



Fig.20: Ordnance Survey map, surveyed 1940-55, published 1955.

King Street Conservation Area

- 3.7. King Street Conservation Area was designated in 1980 and extended in 1998, 2001, and 2009. The King Street Conservation Area Character Appraisal was adopted in 2009.
- 3.8. The King Street Conservation Area encompasses much of the 18th and 19th century commercial expansion of Gravesend. It is focused on the central east-west highway of New Road, King Street, and Milton Road that was established when New Road was laid in 1801, as part of a stagecoach route to London. The streets are lined with commercial buildings, most of them ground floor shops and accommodation above, interspersed with civic buildings and some residential houses. The new carriageway through the town led to the establishment of many inns and coaching houses, some of which remain in King Street and Milton Road. The coming of the railway in the 1850s further strengthened the new developments to the south, transforming the area from rural hinterland to dense urban commercial and residential streets.

- 3.9. Since the street pattern and building line was established in the 19th century, there has been an ongoing replacement and alteration of buildings, leading to a rich variety of architecture. There are many key historic buildings however, including St John's RC Church, the County Court, and some surviving 19th century banks and inns. Almost all of the buildings in the Conservation Area front the back edge of the pavement in continuous rows, yet the mixture of shopfronts and building styles is accommodated within a spacious streetscape.
- 3.10. The property is located within Character Area 1: King Street, Parrock Street (north) & Milton Road. These streets comprise much of the eastern half of the town's commercial and retail centre. The three roads were created in their current form to provide a stagecoach trade and their wide, busy appearance still suits their historic role in Gravesend. They are lined with large, tall buildings and are comparatively broad which affords them a spaciousness that can accommodate traffic and pedestrians. St John's Church is a stock brick building with stone dressings in the Gothic revival style. It sits close to the pavement on the Milton Road elevation with long thin windows and a sheer tower dominating the street scene. On the Parrock Street elevation, the church is set behind a small garden but still fill the skyline. The church forms a group with the attached school, which has a smooth stone façade and leads into an interesting row of tall early 19th century buildings that terminate with The Grapes Public House. Nos. 157 and 158 at the south side of Milton Road form one of the finest houses in the street. The grand ashlar façade with classical details clearly distinguishes it from the modest scale and treatment of the early 19th century terraces opposite.

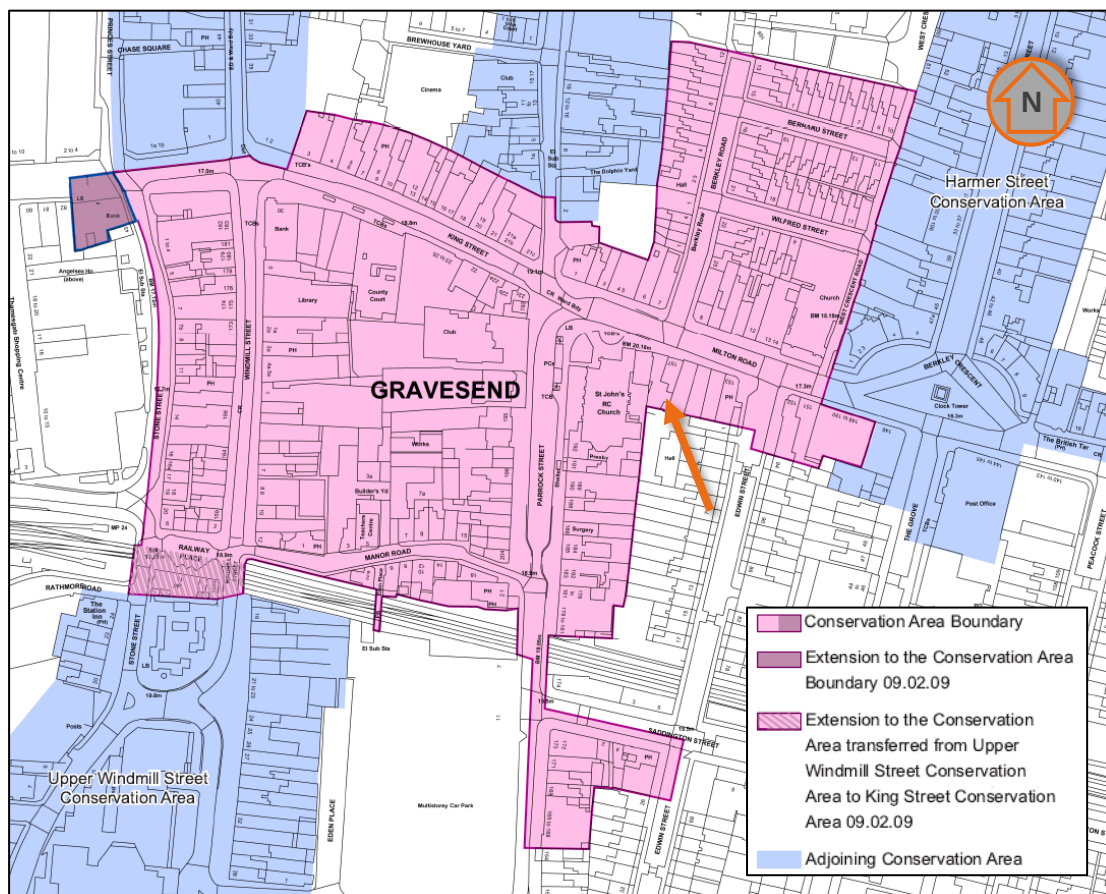


Fig.21: King Street Conservation Area (Source: Gravesham Borough Council).

4.0 PLANNING LEGISLATION AND POLICIES

Legislation

- 4.1. The legislative framework for the preservation and enhancement of listed buildings and conservation areas are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England, defines preservation in this context, as not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 4.2. In 2014, a ruling by the Court of Appeal (Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage and the National Trust) made clear that to discharge this responsibility, decision makers must give considerable importance and weight to the desirability of preserving the setting of listed buildings (and by implication other heritage assets) when carrying out the balancing exercise of judging harm against other planning considerations, as required under the National Planning Policy Framework.
- 4.3. Another ruling made in May 2017 by the Court of Appeal (Barwood Strategic Land II LLP v East Staffordshire Borough Council and the Secretary of State for Communities and Local Government), upheld a High Court ruling, that subordinates National Planning Policy Framework development presumptions to the statutory authority of an up-to-date local plan, as the NPPF is no more than ‘guidance for decision-makers, without the force of statute behind it. Paragraph 13 of the decision states, *‘The NPPF is the Government’s planning policy for England. It does not have the force of statute, and, ought not to be treated as if it did. Indeed, as one might expect, it acknowledges and reinforces the statutory presumption in favour of the development plan, and it also explicitly recognizes and emphasizes its own place in the plan-led system of development control. Its “Introduction” acknowledges that “[planning] law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise”, and that “[the NPPF] must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions”. Paragraph 12 recognizes that the NPPF “does not change the statutory status of the development plan as the starting point for decision making”. Paragraph 13 describes the NPPF, correctly, as “guidance for local planning authorities and decision-takers”, which, in the context of development control decision-making, is “a material consideration in determining applications”. Paragraph 215, in “Annex 1: Implementation”, says that “due weight should be given*

to relevant policies in existing plans according to their degree of consistency with [the NPPF] (the closer the policies in the plan to the policies in [the NPPF], the greater the weight that may be given)”, but this too is guidance for decision-makers, without the force of statute behind it’.

- 4.4. Therefore, by implication, this judgment again emphasises the relative importance of sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in making planning decisions in relation to development that affects listed buildings and conservation areas.
- 4.1. Section 16(2) relates to listed building consent and states ‘in considering whether to grant listed building consent for any works, the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’
- 4.2. Section 66(1) relates to planning applications and states, ‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.
- 4.3. As a minimum, the test provided requires the development to preserve the listed building or its setting.
- 4.4. Section 72(1) of the abovementioned Act is relevant to the proposed development and provides the statutory test against which planning permission affecting conservation areas, as designated heritage assets should be assessed by the Local Planning Authority.
- 4.5. Section 72(1) states, ‘In the exercise, with respect to any buildings or other land in a conservation area, of any... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.
- 4.6. Historic England defines preservation in this context as not harming the interest in the building, as opposed to keeping it utterly unchanged.

National Planning Policy Framework (2023)

- 4.7. As mentioned above, there is a need to carry out a balancing exercise of judging harm against other planning considerations as required under the NPPF. The NPPF sets out the Government's planning policies for England and how these are to be applied. The guiding principle of the document is a presumption in favour of sustainable development and the protection and enhancement of the historic environment is embedded in this approach.
- 4.8. Sustainable development is defined as meeting the needs of the present without compromising the needs of the future. Paragraph 8 of the NPPF breaks down this definition into three objectives: economic, social, and environmental. Within the environmental objective, sustainable development needs to contribute to 'protecting and enhancing our natural, built and historic environment'.
- 4.9. Paragraph 20 of the NPPF contains Strategic Policies, which provide an overall strategy for the pattern, scale and quality of development and make sufficient provision for the conservation and enhancement of the natural, built, and historic environment.
- 4.10. Section 16 of the NPPF contains policies relating to conserving and enhancing the historic environment. Within this section (paragraph 200), the Local Planning Authority requires the applicant to describe the significance of any affected heritage asset including any contribution made by their setting as part of an application.
- 4.11. Significance is defined in Annex 2 of the NPPF, as the value of a heritage asset to this and future generations because of its archaeological, architectural, artistic, or historical interest. Significance also derives not only from the asset's physical presence but also from its setting. Setting of a heritage asset is the surroundings in which the heritage asset is experienced, the extent of which is not fixed and can change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to significance of an asset.
- 4.12. Impact from a proposed development to the significance of a designated heritage asset needs to be evaluated, NPPF paragraph 205, states, 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the 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'.

NPPF paragraph 206 identifies that alteration, destruction, or development within the setting of a designated heritage asset can result in harm to, or loss of, the significance of the asset and that such loss requires a clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and substantial harm or loss of grade I and grade II* listed buildings should be wholly exceptional.

- 4.13. NPPF Paragraphs 207 and 208 define the levels of harm as substantial or less than substantial. The National Planning Practice Guidance (PPG) provides useful guidance on assessing harm in relation to these definitions and gives the following example, 'In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'. The PPG quantifies substantial harm (NPPF paragraph 207) as total destruction while partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may therefore not be harmful to the asset. The PPG advises works that 'are moderate or minor in scale are likely to cause less than substantial harm (NPPF paragraph 208) or no harm at all'. However, it is important to consider each development in its own context as the PPG also identifies that minor works have the potential to cause substantial harm to the significance of an asset.
- 4.14. Paragraphs 207 and 208 refer to 'public benefit' as a means to outweigh the loss of or harm to a designated heritage asset. The PPG identifies that public benefit may follow many developments and as such this benefit could be anything that delivers economic, social or environmental progress which are the dimensions to sustainable development defined by NPPF Paragraph 8. The PPG states, 'Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefit'. Public benefits may include heritage benefits such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risk to heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long- term conservation.

4.15. The three points above relate to NPPF Paragraph 203, which requires the Local Planning Authority to take these points into account when determining applications. Although, there is no defined list of public benefits, examples of public benefit for a designated heritage asset may include:

- The restoration of a listed building.
- The improved setting of a listed building.
- The enhancement of a conservation area.

Local Planning Policy

4.16. As well as legislation and national planning policies, Gravesham Local Plan Core Strategy (2014) and Gravesham Local Plan First Review (1994) - Saved Policies (2014) contain policies relating to the historic environment. Relevant policies include:

4.17. Gravesham Local Plan Core Strategy (2014):

Policy CS20: Heritage and the Historic Environment

The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include:



- Gravesend Town Centre, its development as a heritage riverside town, and its setting;
- The Borough's urban and rural conservation areas; and
- Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

4.18. Gravesham Local Plan First Review (1994) - Saved Policies (2014)

Policy TC2: Policy for Listed Buildings

The Borough Council will adopt the following approach to applications affecting listed buildings:-

- Proposals which involve the demolition of listed buildings will not be granted consent unless the applicant is able to demonstrate substantial and overriding reasons why such consent should be forthcoming. In those few cases where the Borough Council is satisfied that there is no alternative but to grant consent for such demolition, all available means will be used to secure early and appropriate redevelopment.
- In the case of applications for development involving alterations or extensions to listed buildings or affecting the setting of listed buildings, the primary consideration of the Borough Council will be the maintenance of the integrity of the original listed building. Proposals will also need to be sympathetic to the listed building in terms of massing, scale, appearance and materials.
- Applications for the change of use of listed buildings will be considered on their merits, in relation to the land use policies set out in this Written Statement. A major consideration will be whether the character or appearance of the listed buildings will suffer as a result.



Policy TC3: Development Affecting Conservation Areas

The Borough Council will adopt the following approach to applications for development within or affecting conservation areas:-

- i. Where development is acceptable in relation to other policies in this Plan, it will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area. The Borough Council will expect applications to contain sufficient details to enable the impact of the proposal upon the conservation area to be assessed.
- ii. The demolition of unlisted buildings will be resisted unless the Borough Council is satisfied that the existing building is harmful to the conservation area and that the proposals for redevelopment or other use of the site will be beneficial. To this end, the Borough Council may, in suitable cases, require an agreement for the replacement of the building or other suitable treatment of the site, prior to the granting of conservation area consent for demolition.



5.0 ASSESSING SIGNIFICANCE

- 5.1. Significance of a heritage asset is defined by the NPPF as the value of a heritage asset placed on it by current and future generations because of its heritage interest. This interest may be archaeological; architectural; artistic or historical. The setting of a heritage asset also contributes to its significance and is defined by the NPPF as the surrounding in which a heritage asset is experienced. In comparison, Historic England's Conservation Principles (2008) uses evidential; aesthetic; historical and communal values to define significance. These different set of values have been combined for the purpose of this report.
- 5.2. Part 4 of British Standard 7913:2013 Guide to Conservation of Historic Buildings provides information on heritage values and significance. In context, this document states, 'A wide range of factors can contribute to the significance of a historic building. As well as physical components, significance includes factors such as immediate and wider setting, use and association (e.g., with a particular event, family, community or artist and those involved in design and construction)'.
- 5.3. Identifying the values of an asset allow us to understand the degree of significance and inform us of the potential impact the proposed works will have the heritage asset and its setting. These values may be tangible, the physical fabric of the building, capable of being touched, or view such as its landscape. Also, the value may be intangible through a past event or an association with a person.
- **Evidential (archaeological) value** relates to physical aspects of the site which provide evidence from the past. This can be with built form or below ground archaeology.
 - **Historical value** is the extent to which the asset is associated with or illustrative of historic events or people.
 - **Aesthetic (architectural/artistic) value** includes design, visual, landscape and architectural qualities.
 - **Communal value** includes social, commemorative, or spiritual value, local identity, and the meaning of place for people.



5.4. The assessment of significance draws upon information contained in the section on Heritage Assets and uses the values defined above to establish the level of significance detailed below:

- Features of the asset which contribute to the principal historical and architectural interest are considered to be of **high significance**.
- Features of the asset which noticeably contribute to the overall architectural or historical Interest and may include post construction features of historic or design interest are considered to be of **medium significance**.
- Features of the asset which make a relatively minor contribution to the historic and architectural interest are considered to be of **low significance**.
- Features which do not contribute to the historic and architectural interest of the asset, and in some cases may even detract from the significance are therefore considered to be either **neutral or detracting**.

Assessing Setting

5.5. The primary guiding document for assessing setting is The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2017), produced by Historic England is the primary guiding document for assessing setting.

5.6. Setting varies from asset to asset and cannot be generically defined. Changes to the setting of heritage assets may be positive such as replacing poor development which has compromised the assets setting. It is likely that the setting of an asset has changed over time from the dynamics of human activity and natural occurrences such as weather.

5.7. The importance setting makes to the contribution to the significance of the heritage asset is often related to how the heritage asset is seen in views. This can include views looking towards the heritage asset or from the heritage asset looking outwards and may include relationships between the asset and other heritage assets, natural or topographical features. Assets may also be intended to be seen from one another in designed landscapes for aesthetic reasons.

- 5.8. Historic England's Good Practice Advice 3, The Setting of Heritage Assets (2017), notes a staged approach to proportionate decision-taking, with relevant NPPF paragraphs along with guidance contained in the National Planning Practice Guidance (PPG) for their implementation, providing the framework for the consideration of changes affecting the setting of heritage assets which should be assessed proportionately and based on the nature, extent, and level of the heritage asset's significance.
- 5.9. The Guidance recommends a five-step approach to the assessment of the effect of development on the setting of heritage assets as follows:

- 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 ways of maximising enhancement and avoiding or minimising harm;
- Step 5:** make and document the decision and monitor outcomes

Significance of 157 Milton Road

- 5.10. The significance of 157 Milton Road, listed grade II, is derived from its high quality architectural character and level of detailing which sets it apart from other development in the area as a particular contributor to the streetscape and character of the conservation area. Through its historic association with St John's Church and the school run by the Sisters of Mercy from the mid/late 19th century, the property also holds historic and social value (in addition to a recognised architectural/aesthetic group value for the whole row) and makes a notable contribution to the morphology of the area. Despite the ground floor having been altered with a modern ground floor shopfront c.1952, the upper levels of the elevation are nevertheless of high architectural value. Similarly, whilst changes of use through the past century have altered the interior (some rooms more than others, see **HS3** for individual assessment) the overall retention of interior features and layout of interest is reasonable.
- 5.11. 157 Milton Road is a grade II listed building, making it a designated heritage asset considered to be of **high significance**.



Significance of King Street Conservation Area

- 5.12. The significance of King Street Conservation Area is derived from its retained historic layout, which results primarily from a booming and transformative early/mid-19th century development phase. Additionally, surviving high quality listed and locally listed buildings line the streets adding architectural merit and historic streetscapes to create a sense of place. These include the striking St John's Church, inns, and banks, in addition to grand residential properties, some of which have since been converted to commercial uses, as in the case of 157 Milton Road. Whilst incongruous development and alterations have been made in some places, and the historic New Inn has recently been lost to fire damage, the quality of the built environment as a whole is nevertheless good.
- 5.13. For these reasons, King Street Conservation Area is a designated heritage asset considered to be of **medium-high significance**.

6.0 PROPOSED WORKS AND ASSESSMENT

Current Context

- 6.1. The first and second floors of the property are currently in disuse following the recent closure of the restaurant, as which the property has been used since c.1972. Whilst the property retains a reasonable amount of retained historic fabric and layout, some incongruous alterations were also made at various points in the 20th century, presenting opportunities for change and improvement with regards to the current application.
- 6.2. The current proposal has been informed by a comprehensive assessment of the fabric and layout, a version of which can be seen in appendix **HS3**. This results in a heritage-led design which seeks to preserve the special interest in the listed building.

Proposed Works

- 6.3. It is proposed to convert the first and second floor (plus mezzanine) of the property into four flats. The layout of these flats, of which there are two per floor, is dictated by the existing layout of the property and uses internal works only with no changes proposed to the exterior aside from discreet black powder coated vents to the rear elevation serving two adjacent kitchens.
- 6.4. Due to having been reduced to four dwellings compared to six in the previous application (20231004), fewer changes to layout and circulation pattern are required.
- 6.5. However, changes which are proposed include moving the doorway between the two halves of Flat 1, repositioning it to a proposed entrance corridor between the bathroom and living room. Whilst opening up a section of historic wall, this matches the existing second floor layout and is understood to be a compartmentation requirement in line with Life Safety Building Regulations, namely Part B (Fire Safety).
- 6.6. The current proposal also includes sealing the doorway/corridor between Flat 1 and Flat 3 and the stairwell at the centre of the property to the first and second floors respectively.
- 6.7. Subdivision has otherwise been kept to a minimum, and where this or removal of existing partitions is required, the proposal has been informed by the fabric and layout assessment shown in **HS2** and **HS3** so as to be limited, wherever possible, to rooms

and fabric of lesser significance and/or areas already impacted by previous works. This includes the partitioning of the existing large first floor rear restaurant room and toilets (within proposed flat 2) and the removal of the modern partitions in the existing second floor bedrooms (proposed flat 3). The proposed addition of partition walls to form bathrooms and kitchens to the proposed flats 1, 2, and 4 has been dictated by the existing wall layout, presence (or lack) of joinery, and existing window layouts.

- 6.8. The incongruous existing modern stairs in the first floor rear room, encased in partitions, leading to the ground floor are to be removed along with the modern partition and fabric within the chapel in the corresponding second floor.
- 6.9. Historic joinery, identified in the **HS3**, is to be retained or repaired.

Impact

- 6.10. It should be reiterated that the current proposal is a revised design informed by the feedback received from the previous refused applications and a subsequent thorough assessment of the morphology, fabric, and layout of the property by Heritage Unlimited. The design process was heritage-led with the impact of the proposal assessed on a room-by-room basis according to the perceived significance of each space and the fabric contained within. This also helped to identify opportunity to provide **positive impacts** through the removal of existing incongruous features and the retention/repair/reinstatement of historic ones.
- 6.11. The layout of the four proposed flats has been dictated by the existing layout of the property, observing walls and fabric of significance which should be preserved, modern fabric which can be removed, and opportunities for subdivision or enlargement which would not harm significant fabric and circulation patterns. For this reason, it is considered that on balance, the allocation of space, including works to add or remove existing partitions, will cause **no harm** to the listed building.
- 6.12. Regarding the relocation of a doorway in Flat 1, as described in paragraph 6.5, whilst this will result in a low level of less than substantial harm due to the removal of historic fabric, this is offset by the sealing of the adjacent also non-original opening. Furthermore, the placement of the proposed door matches the existing layout of the second floor. As described above, it is understood that this change to layout and circulation is also required to meet Fire Safety (Part B) Building Regulations, which are both necessary and provide public benefit through enabling residential use.

- 6.13. The proposed use of the building as dwellings is considered to be a creative, adaptive, and sustainable reuse of the building which has previously been negatively impacted by conversion to a restaurant (and to ground floor shops, though these are not included in the current application). This would in fact be a return to an original use of the property, which is recognised as a grand residential building in the conservation area appraisal – commercial ground floors with residential upper levels are also a recognised feature of the area. This is therefore deemed to have a **positive impact** and furthermore, will provide public benefit through the provision of four new dwellings, mitigating any low level of harm which may otherwise be perceived through subdivision of the building.
- 6.14. The proposal also presents an opportunity to carry out overdue repairs to historic elements of the property by relevant professionals and invest in the condition and longevity of the property which may otherwise be at risk of continued disuse and deterioration. Therefore, this would have a **positive impact** to both the special interest in the listed building and character and appearance of the conservation area – however as no external works are proposed, the latter would be **preserved** by default.
- 6.15. In summary the proposal is a high quality and well-informed design with regards to heritage matters which will (as a minimum) **preserve** the special interest in the listed building. As the proposal will include repair works and provide an optimum viable use for the property, assisting its long term conservation, the scheme can also be seen as being an **enhancement**.

7.0 CONCLUSION

- 7.1. Paragraph 201 of the NPPF advises Local Planning Authorities that the particular significance, including setting of any heritage asset is assessed. This document has concisely described the heritage assets affected by the proposed works and their significance.
- 7.2. The current application follows a thorough research and revision process to create a proposal which is high quality and appropriate for the architectural style, historic fabric, and layout of the listed building, 157 Milton Road. The design has been informed by a heritage-led process which seeks to identify and preserve retained historic features whilst identifying opportunities for change and the removal of incongruous later alterations.
- 7.3. The application also relates to an updated proposal, which has been revised following feedback received from the previous application (20231004). Consequently, the number of flats proposed has been reduced from six to four, reducing the need for subdivision and impact to fabric and circulation.
- 7.4. It is considered that the proposal successfully creates four new dwellings in a creative and sustainable manner which is an optimum viable use and will facilitate necessary repairs to historic fabric and invest in the longevity and condition of the heritage asset(s). It should also be noted that the property was historically used as a residential dwelling prior to listing, as recognised by the conservation area appraisal, and so this has historic context. In this regard it is concluded that by addressing previous incongruous alterations and improving overall condition, the proposed conversion to four flats will **enhance** the special interest in the listed building.
- 7.5. With regards to the development meeting the statutory test provided by Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is to preserve the setting; building; features of special architectural or historic interest of listed buildings. As the above concludes that the works will have a positive impact and enhance the special interest in the listed building in many respects, this exceeds the minimum requirement.
- 7.6. With regards to the development meeting the statutory test provided by 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is for works to preserve the character or appearance of a conservation area. As no external



works are proposed, there will be no impact to the conservation area and so its character and appearance will be preserved. However, as the works are expected to improve the overall condition of the site through repair and upkeep, a minor enhancement could also be argued.

- 7.7. It should be remembered that Historic England defines preservation in this context as not harming interest in the heritage asset as opposed to keeping it utterly unchanged.
- 7.8. With regards to NPPF paragraphs 205-208, as no harm will be caused to the designated assets, no public benefit is required. Benefit is nevertheless found however as the scheme will provide four new residential dwellings to the area, with this also considered to be the optimum viable use, assisting long term conservation of the asset.
- 7.9. In regard to local policies CS20, TC2, and TC3, as discussed above, the proposal has a positive impact to the significance and character and appearance of the heritage assets through quality and appropriateness of design and layout which results from the high regard given to the assets during the design process.
- 7.10. In conclusion, the proposed conversion and associated internal works meets the requirements of the Planning (Listed Buildings and Conservation Area) Act 1990, the NPPF and local planning policies. It is therefore, requested that the planning application be approved.



8.0 SOURCES

Ministry of Housing, Communities & Local Government (2023), *National Planning Policy Framework*.

Planning (Listed Buildings and Conservation Area) Act 1990

Ordnance Survey Maps (various dates)

Ministry of Housing, Communities & Local Government (2018) <http://planning.guidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment> / National Planning Policy Framework (NPPF 2019 revision) / National Planning Policy Guidance (NPPG 2019) / National Design Guide (2019)

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

Historic England (2008) *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Historic England Advice Note 10 on Listed Buildings and Curtilage (2018)

Google Earth

British History Online

Mapping Kent

Old Maps Online

King Street Conservation Area Character Appraisal (2009)

Gravesham Local Plan Core Strategy (2014)

Gravesham Local Plan First Review (1994) - Saved Policies (2014)



HS1

Listing Description

Heritage Category	Listed Building
Listed Building Name	158, MILTON ROAD, 157, MILTON ROAD
Address	158, MILTON ROAD, 157, MILTON ROAD
List Entry Number	1055841
Grade	II
Date First Listed	23 January 1952
Date Amended	N/A
District	Gravesham (District Authority)
Parish	Bearsted
National Grid Reference	TQ 64921 74087

Listing Description

1. 5277 MILTON ROAD (South West Side) No 157 No 158 TQ 6474 SE 1/25 23.1.52.

II GV

2. Circa 1840. 3 storeys and semi-basement ashlar. Cornice and parapet. Cast iron balcony of good Anthemion design on 1st floor. 4 sashes with glazing bars intact. The easternmost window bay projects and is flanked by pilasters with a semi-circular tympanum over the 1st floor window. Windows above the ground floor are set in moulded surrounds, the centre 1st floor one having a pediment also. Modern shopfront.

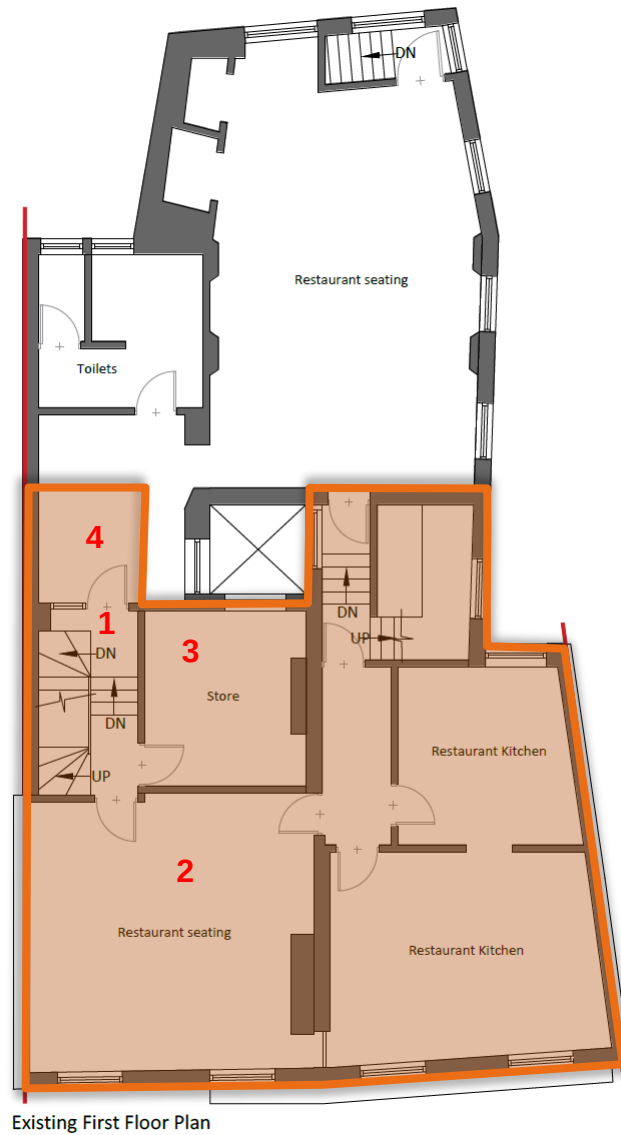
Nos 153 to 158 (consec), the Roman Catholic Church of St John the Evangelist and School adjoining form a group. (Nos 154 to 156 (consec) are local interest buildings).

HS2

Building Morphology

Map regression overlaid onto exiting first floor plan.

N.B. It should be remembered that there is always some minor discrepancy with scale when overlaying maps.



1907 OS map plan form – closet wings appear to have been reduced in



Existing First Floor Plan

1932 OS map plan form – changes to the rear elevation have altered the projecting form of the closet wing.





Existing First Floor Plan

1940 OS map plan form – shows the properties as to elements with the rear project being part of no.158.

- No.157 plan form
- No.158 plan form

HS3

Fabric Assessment

This document has been compiled following a site visit to 157 Milton Road – formally nos.157 & 158 Milton Road.

A version of this assessment was also supplied to the client during the design process to inform the proposed works with respect to preserving fabric/layouts of interest and identifying opportunities for change or enhancement in areas of low or no significance.

The numbers below can be cross referenced with those on the attached plan.

First Floor

1. Stairwell/Hallway – no.158

- a. Staircase leading from main entrance at no.157 is probably situated in its original position, however, it cannot be said definitively without opening up works whether the staircase is original.
- b. The first section of the staircase and the quarter landing were formed in 1952 as part of works to the building to form shops to the ground floor of nos.157 and 158 following the departure of the Sisters of Mercy.
- c. As part of the 1952 works, the original entrances access via a short flight of steps to the properties were removed and the ground floor level lowered.
- d. The basement and street access were also lost with the area to the front of the building being paved over to form a public footpath.
- e. Balustrade to the stairs is 20th century in date and of no value to the significance of the building.
- f. Modern door and partition wall leading to room 4.

The area is of low to medium significance – changes are possible.

2. Restaurant Seating - Part of the original early/mid-19th century development of no.158.

- a. French door appears to have historic context but there are some modern repairs, particularly to the left-hand door which has different glazing bars.
- b. The 1952 elevation drawing shows a railing in context with that found to front of no.157.
- c. Window is original.
- d. Skirting boards appear to be historic.
- e. Cornice remains in situ above the modern dropped ceiling.
- f. Two doorways – one at either side of the chimney breast have been inserted. This was probably done when the building was a convent, however the opening could relate to the building's use as a restaurant. The doors are modern.
- g. The doorway leading into the room from the hallway retains historic architraves, but it appears to have been overlaid with modern timber detailing.
- h. The door also appears to have historic context, but it appears to have been adapted to have a glass panel to the upper half of the door.

The room is of high significance.

3. Store – Part of the original early/mid-19th century development of no.158.
 - a. The room retains its original skirting, door, and window.
 - b. The marble fire surround has been removed from the chimney breast and placed inside the opening of the breast.
 - c. Floorboards appear to be original.

The room is of high significance and changes to the room should be minimal.

4. Room was originally part of the closet wing to no.158, which appears to have been reduced in length between 1863 and 1907. The present space relates to works carried out between 1923 and 1933 when a rear extension was added for the convent.
5. Lightwell appears to have been formed between 1923 and 1933 when the rear extension was added.
 - a. The north wall of the lightwell is constructed from brick and appears to be part of the original plan form of the property (see morphology **HS2**).
 - b. The south, west and west walls of the lightwell are formed with glazed brickwork and its construction date relates to the 1923-32 addition.
 - c. Multipaned sash windows to rooms 4 and 8 appear to be 20th century and not original as they have horns - a feature associated with single or two paned sash windows and added to stiles to reinforce the mortice and tenon joint between the stile and meeting rail.
6. Toilets have been formed in the 1923-33 addition and probably relate to the building's use as a restaurant. The fabric is of no significance, including the windows which are modern.

The room is of low to neutral significance and changes would have less impact on the significance of building.

7. Formally the restaurant bar and seating, this area was part of the 1923-33 addition and its original use is not known.
 - a. The transom and mullion windows are contemporary with the date of the addition and the metal windows with leaded lights are in need of some repairs.
 - b. The paint to the stone mullion and transoms should be removed by specialist means and replacement paint should be lime, this will allow the stone to breathe.
 - c. The architraves to the doorways have context to with the religious use of the building. These should remain in situ.
 - d. Beneath the carpet, the original parquet floor is retained.
 - e. The dado and skirting to the room are modern.
 - f. The door leading to room 10 is modern.

- g. To the south elevation a staircase leading to the ground floor and encased by partition work is modern. This fire escape was probably inserted when the building was used for a restaurant.

The room is of medium to high significance.

8. Hallway/Stairwell – no.157.

- a. Staircase leads to second floor of no.157 and may be original, however the balustrade is identical to that in no.158 and probably relates to the 1923-32 work as the balustrade is identical to the staircase that leads to the mezzanine floor, which is part of the 1923-32 addition.
- b. The hallway gives access to rooms 9 and 10 which are part of the original plan form of no.157.

The room is of medium significance.

9. Restaurant Kitchen – rear room to no.157

- a. This room retains cornice work which is probably contemporary with the building's construction and contributes to the significance of the building.
- b. The dado rail is likely to be historic.
- c. The window is original and the architrave to opening leading from room 8.

The room is of medium to high significance.

10. Restaurant Kitchen – front room to no.157

- a. This room may originally have been a bedroom and retains several elements of historic fabric including the cornice work, which has been damaged in places.
- b. The windows to the room appear to be original as does the joinery to the reveals and may contain window shutters.
- c. As identified above, the doorways to the party wall with no.158 are later insertions and from the architrave detail, are estimated as mid-20th century.
- d. The doorway between this room and room 9 is also appears to be a mid-20th century insertion from the detail of the architrave.
- e. The doorway leading to room 8 is historic and retains architrave contemporary with the building's construction date.

The room is of medium to high significance.

Second Floor

11. Staircase/Hallway – no.157.

- a. Balustrade identical to discussed above and probably a post construction change.

The area is of low to medium significance – changes may be possible but limited.

12. Area between hallway and room 12 – no.158.

- a. The fabric of this area appears to be modern.
- b. The doorway to room 12 is probably a modern change as the door to the room 12 was originally perpendicular (north wall) to this later inserted doorway. This original doorway is retained but not useable.

The area is of low to medium significance – changes may be possible.

13. Restaurant Seating – front room to no.158

- a. This room has been adapted with the loss of an internal wall (a small section is retained to the west of the room) and the joinery detail (skirting and dado) are modern.
- b. The windows are historic with modern secondary glazing, which is not the best aesthetically as they have vertical meeting rail which impacts negatively on the horizontal meeting rail of the sash window.
- c. The architraves to the windows are historic.
- d. A modern doorway has been inserted to the north end of the party wall with no.157. This doorway leads to bedroom 2 situated in no.157.
- e. The room retains its chimney breast, but no fire surround and the opening has been infilled.
- f. To the south end of the party wall another post construction opening had been formed between the two properties.
- g. To the south end of the room is a modern partition with sliding doors leading to room 14 (store).
- h. The room has a modern dropped ceiling and on inspection, there is no cornice to this room.

The area is of low to medium significance.

14. Store – rear room to no.158

- a. This room has been significantly adapted post construction.
- b. The window is modern and the room has a modern dropped ceiling.
- c. The doorway to the room originally led from the hallway now room 12.

The area is of low significance.

15. Hallway to rear addition of no.158

- a. This area may have been part of the original plan form of the building and the adapted into the 1923-32 extension.

The area is of low to medium significance.

16. Toilets.

- a. This area may have originally been used as toilets and WCs and relates to its original use when the extension was added in the early/mid-20th century.
- b. The fabric (architraves; doors; tiles; and windows) appears to be contemporary to the construction date of the addition.

The area is of low significance.

17. Part of the chapel.

- a. The room retains significant fabric such as flooring; arched doorways; doors; and timber ceiling relating to the religious use of the addition. The timber is of good quality pine.

The room is of medium to high significance.

18. Former Chapel

- a. The ecclesiastical character of this room provides context that it was originally used as a chapel for the nuns living at the convent. Its past use and retained character provide a high degree of architectural and historic value to the overall significance of the room.
- b. The addition of a mezzanine floor and stairs to the chapel are incongruous.
- c. A partition wall has also been constructed to form a room.
- d. There also appears to be a degree of failure to the wall plaster and the leaded windows are in need of refurbishment.

- e. The door to the room is post construction insertion and this opening is unlikely to have had a door.
- f. The original parquet floor is retained.
- g. The ceiling of the chapel is formed with timber planks with moulded timbers provided rib detailing with the overall shape giving context to a barrel vault ceiling.
- h. To the east wall of the chapel is a small vestry, this room is part of the chapel.

The room is of high significance.

19. Post construction room formed in Chapel.

- a. This room has been formed with the creation of post construction partitions.

As part of the former chapel, the space is of high significance.

20. Stairwell and Hallway.

- a. The stairs are probably part of the early/mid-20th century addition, and the balustrade is identical to that seen on the staircase to no.157. Therefore, as this staircase is part of the 20th century works it is likely the balustrade seen elsewhere in the building also date to this period.
- b. The stairs lead to a balcony in the former chapel.
- c. Hallway gives access to rooms 21 and 22.
- d. The windows appear contemporary with the construction date of the addition.

The room is of medium significance as it forms part of the chapel through access to the balcony.

21. Store – rear room to no.158.

- a. This room retains its original windows; fire surround; and door.
- b. The cornice to room may be part of the early/mid- 20th century work but could have been installed later.
- c. A cupboard formed in the right hand side alcove is probably contemporary with the date of the building.

The room is of medium significance.

22. Corridor – front room no.158.

- a. Area created by altering the original room plan post construction.

The room is of no significance.

23. Bedroom 2 – front room no.158.

- a. This room, along with rooms 22 and 24 have been created from the subdivision of a single room at some point post construction. I would surmise this works was carried out when the building was a restaurant or when the building was adapted in 1952.
- b. The window is original as is the alcove cupboard.
- c. The ceiling tiles are late 20th in date as is the cornice.

The room is of medium significance.

24. Bedroom 1 - front room no.158

- a. As identified above, original part of the same room as nos.22 and 23.
- b. The room retains is original window and skirting boards.
- c. The door relates to the post construction work as do the ceiling tiles and cornice.
- d. A short staircase remains which once give direct access to the former adjacent school and is evidence of the past association of the building's connection with the neighbouring church.

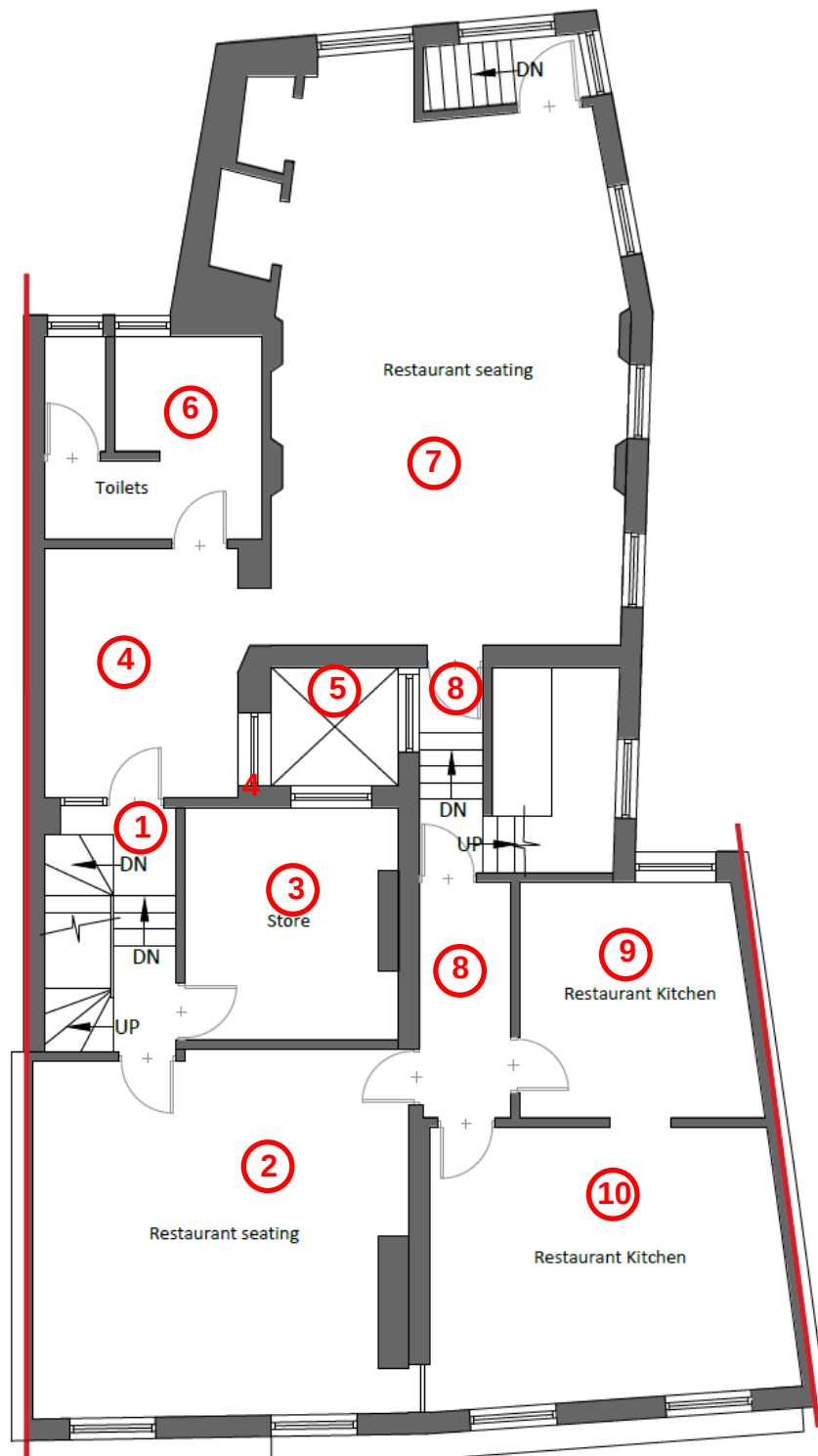
The room is of medium significance.

Mezzanine Floor

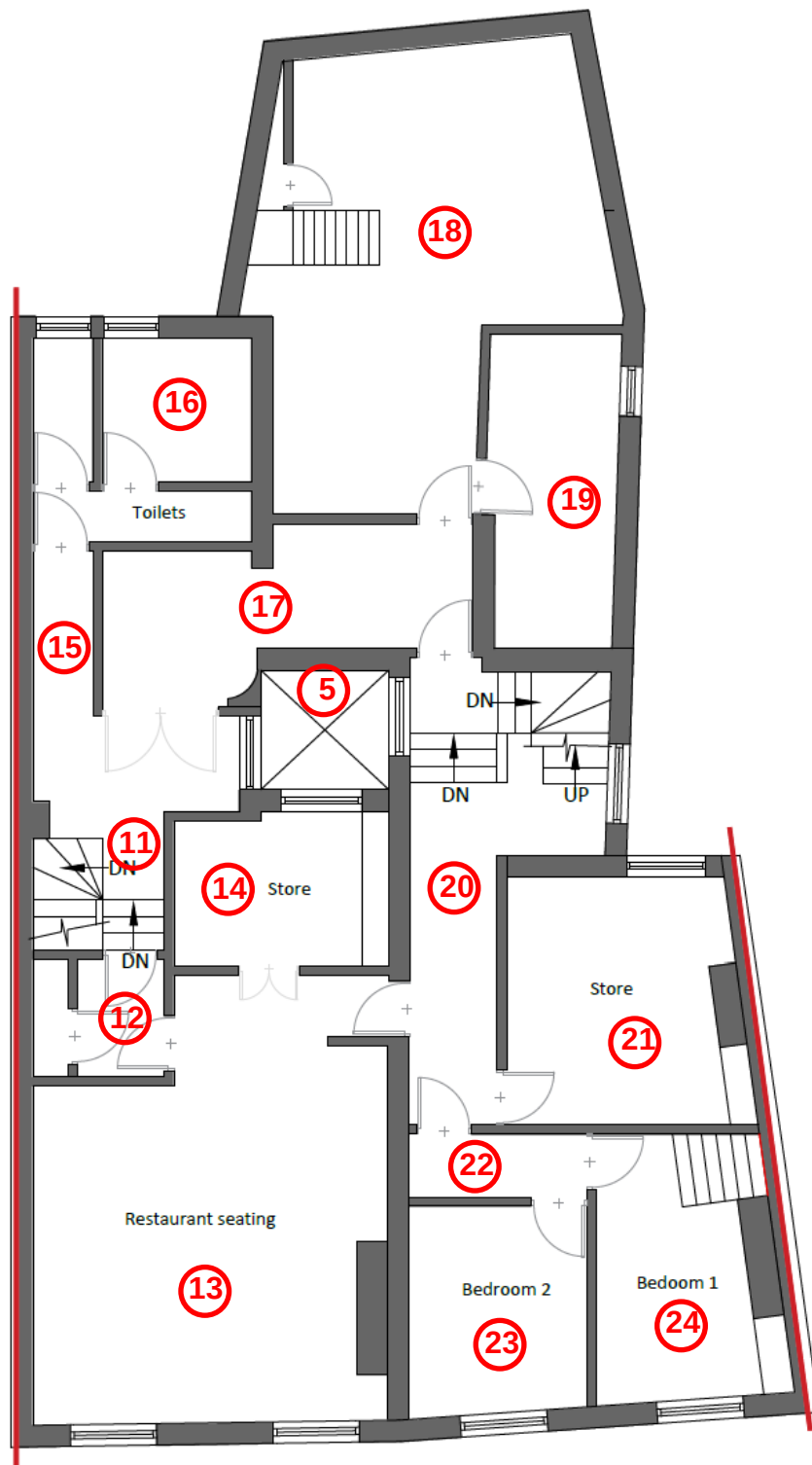
25. Bedroom 3 – former balcony to chapel.

- a. The doorway leading from the staircase to room is original as is the door and architrave. The door handle is modern.
- b. The room has the same barrel vault ceiling as the chapel.
- c. The room retains its original tracery windows and glazing, which need some restoration work.
- d. A modern partition wall had been created to form the bedroom.

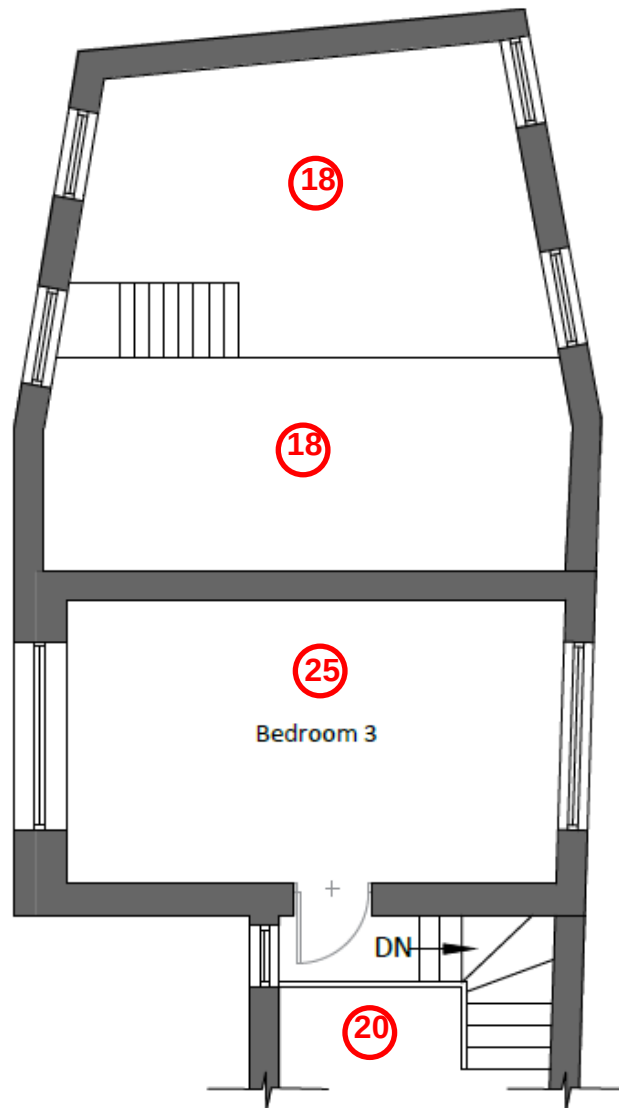
The area is of high significance.



Existing First Floor Plan



Existing Second Floor Plan



Existing Mezzanine Floor Plan



understanding
heritage
to inform
change