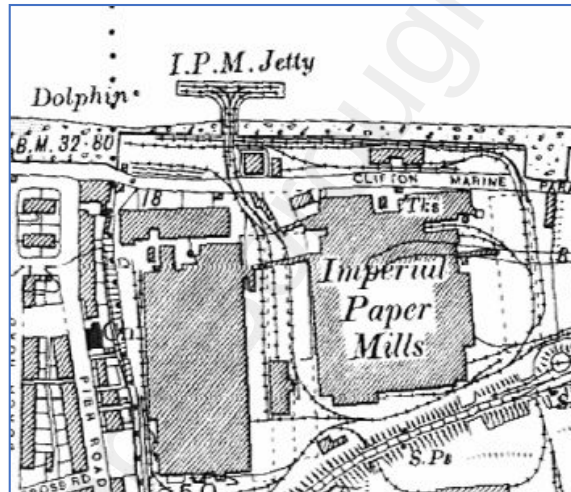




## Proposed development at Imperial Wharf Gravesend



## Cultural Heritage Assessment May 2022

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### Appendix A:

Rosherville Quay Walls, Steps, Drawdock and WWII Mine Watching Post  
Official list entry

### 1.1.1 Description of the proposed development

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The full description of the proposed scheme is set out in the Planning Statement. In brief, it would comprise four main aspects: two additional bitumen storage tanks, a load out gantry, an emulsion plant and the provision of alternative car parking.

The proposed layout and elevations are shown on **Figures 2 and 3A/B/C.**

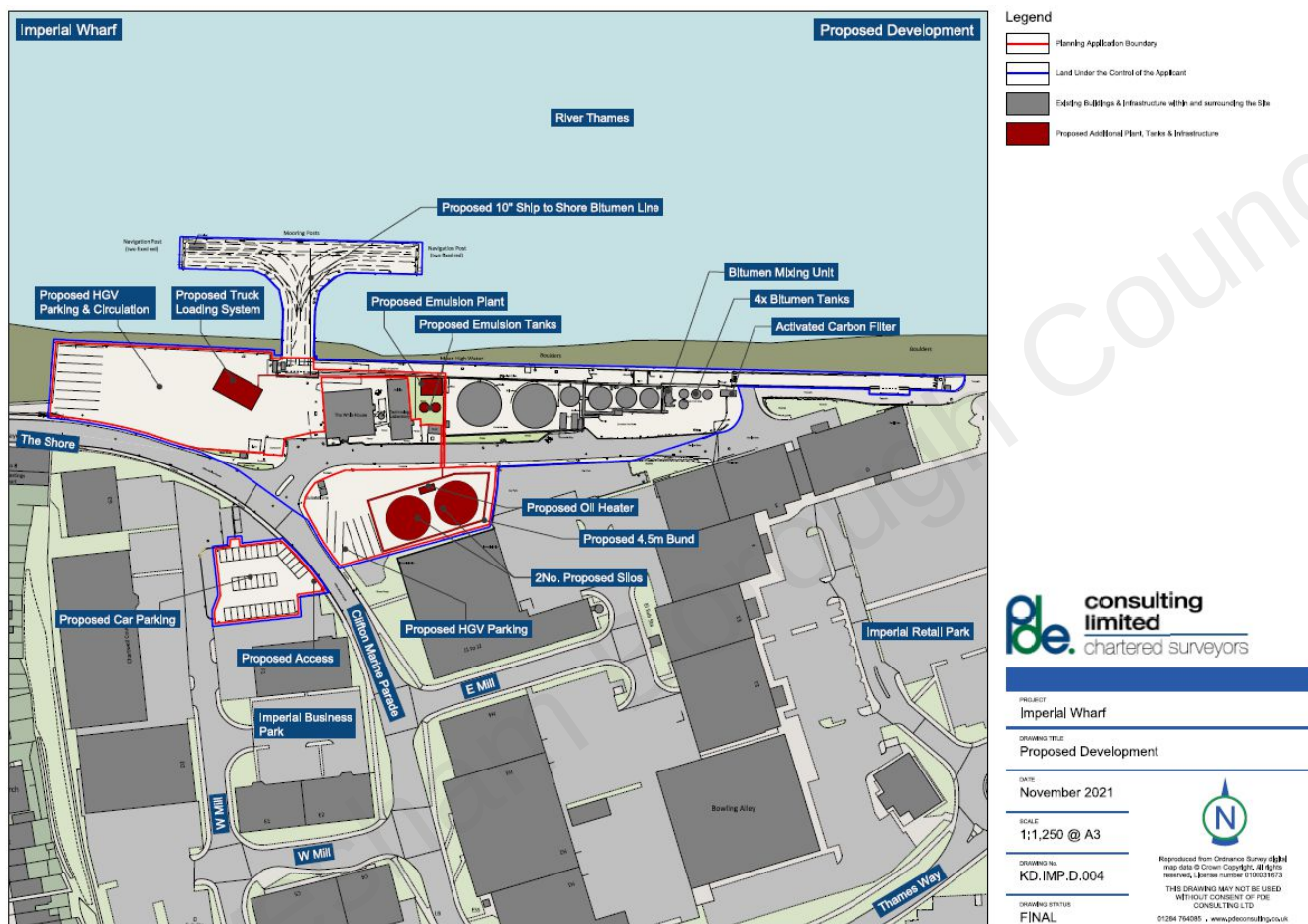


Figure 2 Proposed Layout

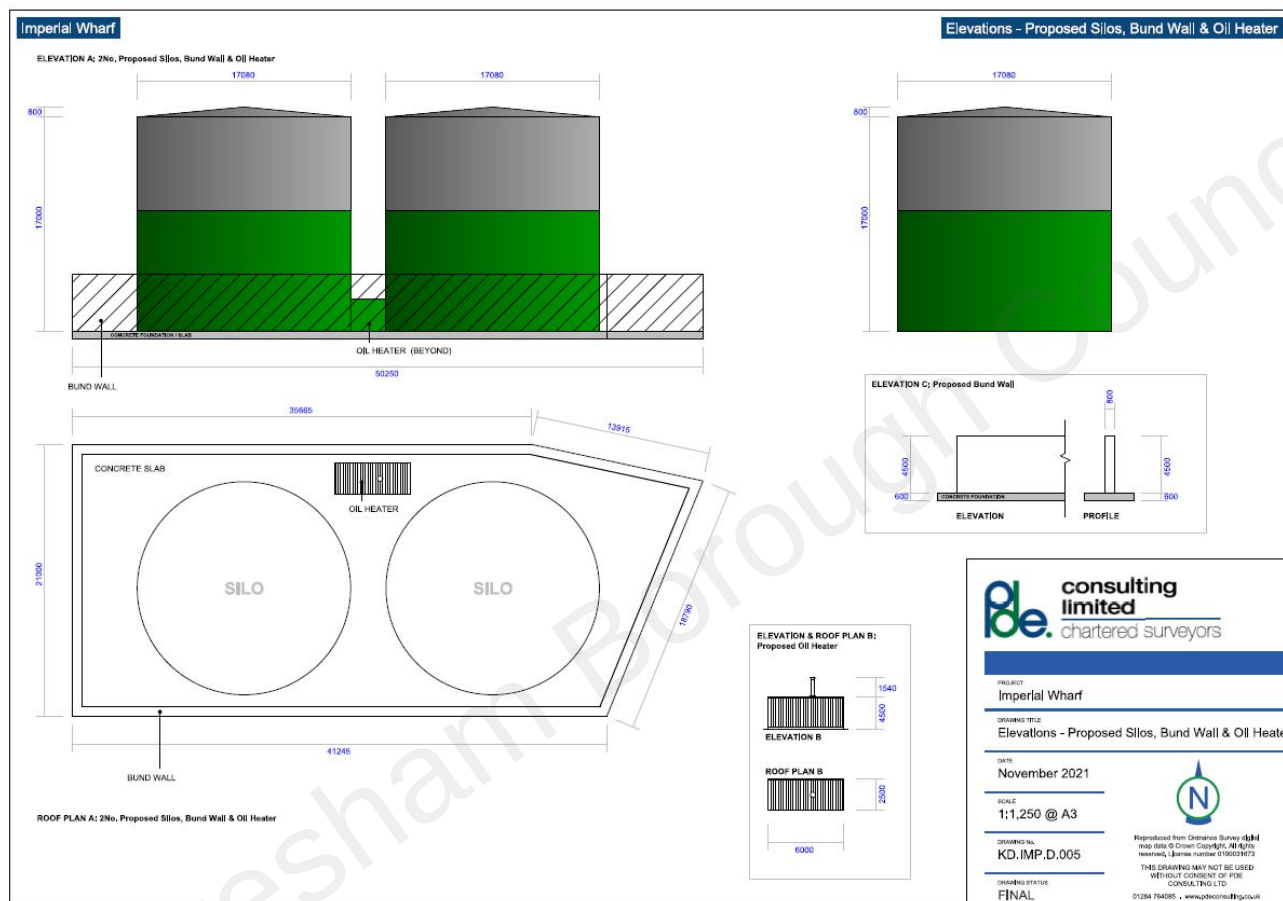


Figure 3A Proposed Elevations

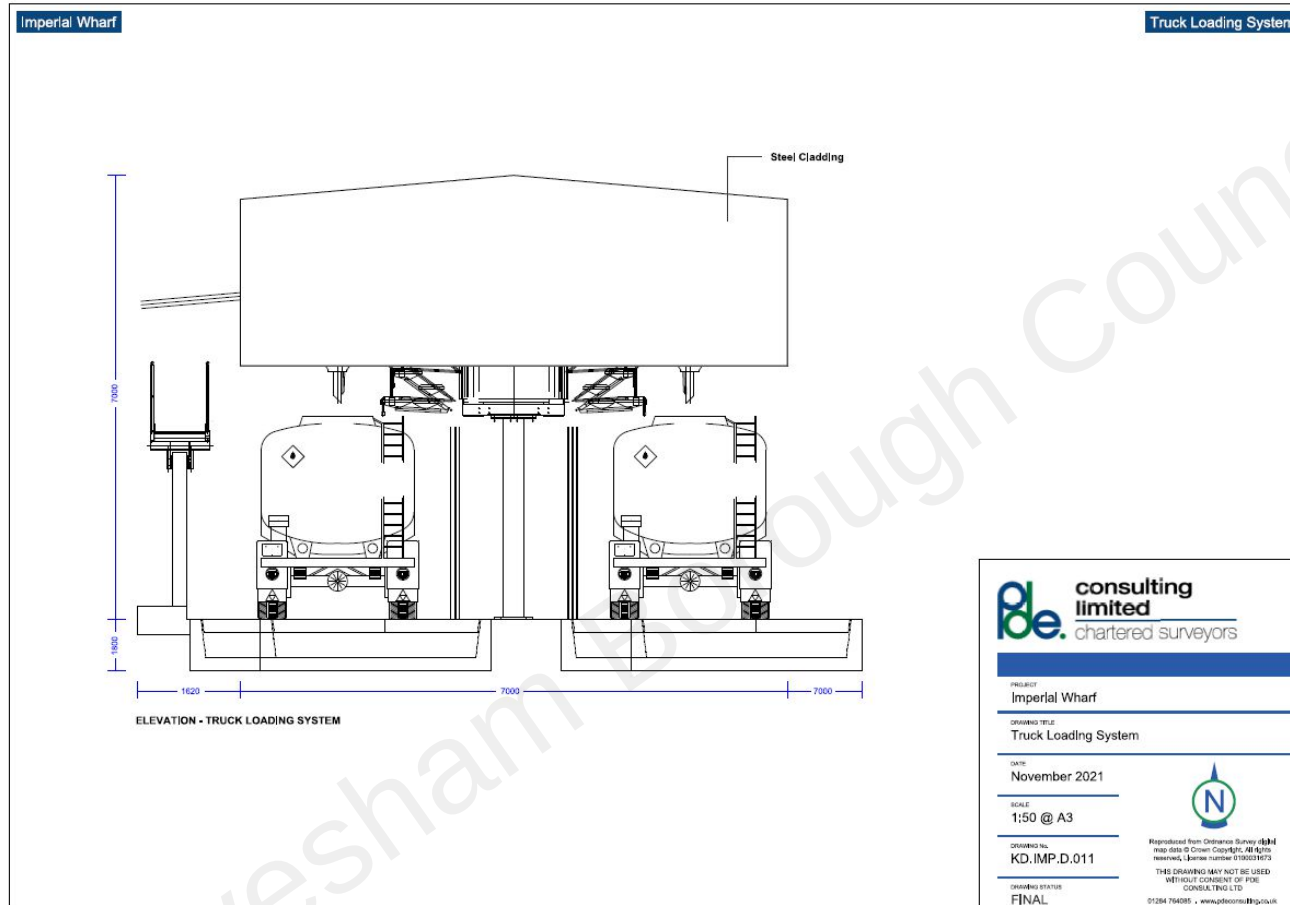


Figure 3B Proposed Elevations

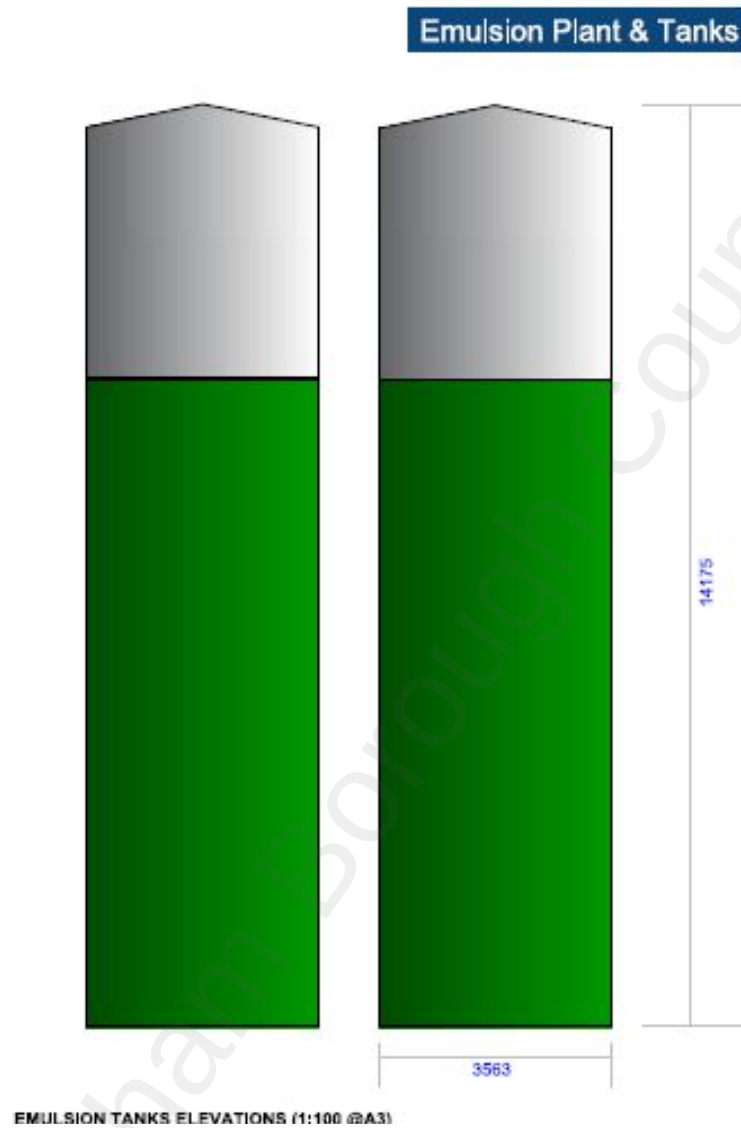


Figure 3C Proposed Elevations

### **1.1.2 Setting**

The proposed location for the bitumen storage tanks is immediately to the south of Imperial Wharf and to the north of the Imperial Business Estate (IBE), an industrial and retail area lying west of Gravesend Town Centre that is set at a low level within a former quarry and subsequently occupied by the Imperial Paper Mills (demolished in the 1980s). This part of the PDA comprises an area of car parking used by FM Conway Limited on part of the site of the Mills and the former Hit and Miss Public House.

The northern part of the PDA where it is proposed to install a truck loading gantry and emulsion plant is within Imperial Wharf which borders the River Thames. The wharf includes the jetty to the river Thames, a yard/compound adjacent to the river on the west side, the White House (a three-storey office building that was formerly the laboratory and offices of the Imperial Paper Mills) and other offices, and a series of storage tanks adjacent to the river frontage.

### **1.1.3 Scope of cultural heritage**

Cultural heritage is represented by a wide range of assets that result from past human use of the landscape. These include historic structures, many still in use, above ground and buried archaeological monuments and remains of all periods, artefacts of anthropological origin and evidence that can help reconstruct past human environments. In its broadest form cultural heritage is represented by the landscape and townscape itself.

Assessment should consider both direct and indirect effects upon cultural heritage. Indirect effects can occur as a result of changes to the setting of a landscape or asset, whether permanent or temporary. This is particularly relevant to designated cultural heritage assets, such as Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens.

## **1.2 SCOPE OF RESEARCH**

In order to assess the effects of the potential scheme, cultural heritage information within and up to 1km from the PDA was examined.

A variety of sources were consulted including the Kent Historic Environment Record (KHER), the Defra *Magic* Database, Historic England Archive, maps and readily available local history materials. A site visit was undertaken in May 2021.

The work was undertaken by Andrew Josephs and Ian Meadows of AJA.

All work has been undertaken in accordance with *Standard and Guidance for Archaeological Desk-Based Assessment* (Chartered Institute for Archaeologists 2008, revised 2012) and Historic England 2019 *Statements of Heritage Significance* (HE Advice Note 12).

## **1.3 AUTHORSHIP**

Andrew Josephs is Managing Director of Andrew Josephs Associates, a consultancy specialising in cultural heritage founded in 2002. Andrew has extensive experience of all periods and facets of cultural heritage. He is involved primarily in planning applications, EIA and the design of mitigation strategies on developments with heritage constraints. Currently

Andrew is heritage consultant to over 100 companies across Europe. He has undertaken in excess of 1000 cultural heritage assessments (the majority under the EIA Regulations) since becoming one of the UK's first archaeological consultants in 1992. He was previously Principal Consultant (Director of Archaeology) at Entec (now Wood) and Wardell Armstrong. Prior to 1992, he worked as a field-based archaeologist and researcher for universities and units in the UK, Europe and the USA. He has lectured widely and was visiting lecturer in Environmental Impact Assessment at the University of Nottingham.

Ian Meadows is an archaeologist with over 30 years' experience in a variety of professional areas. He was Senior Project Officer with Northamptonshire Archaeology (now MOLA) from 1992 until 2014 when he joined AJA. Ian is highly experienced project manager of large landscape projects such as long running quarries. Ian has a particular interest in the Roman period and is currently Director of the excavations at Irchester Roman town. In addition to his fieldwork he is engaged in regular outreach sessions to both professional and amateur groups as part of his role dealing with both adults and children. He has been teaching archaeology and landscape history to adults and children since the late 1980's, previously being engaged as a tutor by Cambridge University, Anglia Ruskin University, Bath University and the WEA and feels it is important to disseminate the information derived from projects to a wider audience.

## **1.4 RELEVANT LEGISLATION, POLICY AND GUIDANCE**

### **1.4.1 Historic Environment Statutory Legislation**

The importance of cultural heritage is clearly recognised at both national and local levels. **Table 1** summarises the statutory legislation relating to the historic environment relevant to this study.

**Table 1 Historic Environment Statutory Legislation**

| <b>Legislation</b>                                            | <b>Key Issues</b>                                                                                                                                                                                                           |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Burial Act (1857)                                             | Under Section 25 of the 1857 Act, it is a criminal offence to remove human remains from any place of burial without a licence from the Ministry of Justice.                                                                 |
| Ancient Monuments and Archaeological Areas Act (1979)         | It is a criminal offence to carry out any works on or near to a Scheduled Ancient Monument without a Scheduled Monument Consent.                                                                                            |
| Protection of Military Remains Act (1986)                     | The Act outlines the criteria for designating a military crash site. Certain activities are prohibited at protected sites, without the authority of the Secretary of State.                                                 |
| Planning (Listed Buildings and Conservation Areas) Act (1990) | No works can be carried out in relation to a listed building without listed building consent. Designation of an area as a 'conservation area' introduces general controls over demolition and development within that area. |
| Treasure Act (1996)                                           | The 1996 Act defines 'Treasure' as any object that is at least 10% gold or silver, associated coins or groups of                                                                                                            |

|                             |                                                                                                                                                                                                                                                                                                           |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | coins which are over 300 years old, objects formerly classed as 'treasure trove' (i.e. deliberately deposited items with a high content of gold or silver) and any objects found in association with the above. Any find of 'Treasure' must be reported to the local Coroner.                             |
| Hedgerow Regulations (1997) | It is against the law to remove most countryside hedgerows without permission. A local authority can prohibit the removal of an 'important' hedgerow. The 1997 Regulations define the criteria for determining whether a hedgerow is important, and these include historical and archaeological criteria. |

#### 1.4.2 National Policy and Guidance

In accordance with best practice the significance of an effect should be identified as part of this assessment. This is achieved using a combination of the following published guidance and professional judgement.

- National Planning Policy Framework, updated 2021. Department for Communities and Local Government.
- Planning Practice Guidance: *Conserving and Enhancing the Historic Environment* <http://planningguidance.planningportal.gov.uk>
- Historic England<sup>1</sup> 2008. *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.
- Historic England 2017. *The Setting of Heritage Assets* (GPA3)
- Historic England 2019 *Statements of Heritage Significance* (HE Advice Note 12)

#### 1.4.3 National Planning Policy Framework

National planning policy on how cultural heritage should be assessed is given in the National Planning Policy Framework, updated in 2021. This covers all aspects of heritage and the historic environment, including world heritage sites, scheduled monuments, listed buildings, conservation areas, registered parks and gardens, battlefields and archaeology.

Of particular relevance to this application are:

*194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include,*

<sup>1</sup> Historic England includes its former name English Heritage

*heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

*195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

*196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*

*197. In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

*198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.*

#### ***Considering potential impacts***

*199. 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.*

*200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.<sup>2</sup>*

---

<sup>2</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

*201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

*203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

*204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.*

*205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*

#### ***1.4.4 Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment***

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment was published in April 2014 as a companion to the NPPF, replacing previous Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG includes the following in relation to the evaluation of significance and harm:

*“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.*

*Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For 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.*

*While the impact of total destruction is obvious, 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, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."*

#### **1.4.5 Historic England: The Setting of Heritage Assets (GPA3)**

This Good Practice Advice Note published in 2017 observes that amongst the Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases. These steps have been followed in the assessment below and are set out in **Section 3**.

#### **1.4.6 The Local Plan**

The Gravesham Local Plan Core Strategy and Policies Map (September 2014) is the current local planning policy. The PDA is within an Opportunity Area (Core Strategy Policy CS03: Northfleet Embankment and Swanscombe Peninsula) in the Gravesham Local Plan Policies Map.

In relation to heritage and the historic environment, Policy CS20 gives 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.

Policy CS20 is reproduced below.

### **Policy CS20: Heritage and the Historic Environment**

**5.16.10 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.**

**ANDREW JOSEPH ASSOCIATES**  
*Archaeological and Cultural Heritage Consultancy*

**5.16.11 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.

**5.16.12 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.**

Saved Policy TC3 sets out the approach that will be adopted when considering proposals that have the potential to affect Conservation Areas.

#### Development Affecting Conservation Areas

It is especially important that new developments in conservation areas make a positive contribution and Borough Council policies will require a high standard of design and materials in any new development in such areas. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Planning Authority to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. There is also a greater restriction on permitted development rights in conservation areas than elsewhere.

#### **Policy TC3**

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

#### **1.4.7 Regional Research Agenda and Themes**

The South East Research Framework (SERF), which commenced in 2007, aims to identify what we know about the South East's historic environment and what we want to know more about. Researchers from all sectors of the archaeology community are working together to build a list of gaps in our current understanding and produce a research agenda and strategy for the future. The project is supported by the County Councils and Historic England.

### **1.5 ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA**

Four criteria have been considered in evaluating the significance of the residual effects of the proposed development, taking into account any proposed mitigation measures.

#### **1.5.1 Type of Impact**

Impacts may be beneficial, adverse, neutral (i.e. no discernible effect) or none. They may be permanent or temporary, of long, medium or short duration, direct or indirect. They may also be cumulative or combined with other effects occurring in the vicinity.

Direct impacts have a physical effect upon an archaeological site, structure or cultural heritage asset. This may lead to the partial or total destruction of that asset.

Indirect impacts of development upon scheduled monuments, listed buildings, parks and gardens and other designated assets of the cultural heritage landscape are more difficult to assess. Consideration should include the context (or setting) of a cultural heritage asset (or place) and how we should assess its significance. Contextual relationships may be visual, but can also be, for example, functional, historical or intellectual.

#### **1.5.2 Likelihood of the impact occurring**

An assessment is made as to the likelihood of the identified impact occurring. Probability is considered as certain, likely, unlikely or uncertain.

#### **1.5.3 Sensitivity**

Five categories of sensitivity are identified. These are expanded upon in **Table 2**, below.

**Table 2 Definitions of sensitivity**

| <b>Value (Sensitivity) of receptor/resource</b> | <b>Definition</b>                                                                         |
|-------------------------------------------------|-------------------------------------------------------------------------------------------|
| Very high                                       | Sites and settings of <i>international importance</i> , for example World Heritage Sites. |

|            |                                                                                                                                                                                                                                                                                                                     |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High       | Sites and settings of <i>national importance</i> . Scheduled Monuments. Registered Battlefields. Grade I and Grade II* Listed Buildings and Registered Historic Parks and Gardens. Sites may also be discovered as a result of new research that are also of national importance and are candidates for scheduling. |
| Medium     | Sites and settings of <i>regional importance</i> . Archaeological sites and features that are not considered sufficiently important or well-preserved to be protected as Scheduled Monuments. Grade II Listed Buildings and Grade II Registered Historic Parks and Gardens. Conservation Areas.                     |
| Low        | Archaeological sites and structures, and other components of the historic environment that contribute to the local landscape. Locally designated assets.                                                                                                                                                            |
| Negligible | Archaeological sites and structures, and other components of the historic environment of very low importance.                                                                                                                                                                                                       |

#### 1.5.4 Magnitude

The magnitude of change to a cultural heritage asset or landscape is considered in terms of its vulnerability, its current condition and the nature of the impact upon it. With respect to sub-surface archaeology, there may be a degree of uncertainty of the magnitude of change, and where this is the case it is noted. Magnitude is assessed as major, moderate, minor or negligible/ none and the criteria used in this assessment are set out in **Table 3**, below.

**Table 3 Criteria for Assessing Magnitude of Change<sup>3</sup>**

| Magnitude of impact (change) |            | Typical description                                                                                                                                                               |
|------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Major                        | Adverse    | Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.                                                            |
|                              | Beneficial | Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.                                                              |
| Moderate                     | Adverse    | Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.                                                 |
|                              | Beneficial | Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.                                                                          |
| Minor                        | Adverse    | Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements.                      |
|                              | Beneficial | Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring. |
| Negligible                   | Adverse    | Very minor loss or detrimental alteration to one or more characteristics, features or elements.                                                                                   |
|                              | Beneficial | Very minor benefit to or positive addition of one or more characteristics, features or elements.                                                                                  |
| No change                    |            | No loss or alteration of characteristics, features or elements; no observable impact in either direction.                                                                         |

<sup>3</sup> Source: Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Modelling*, page 14

### 1.5.5 Assessing significance

**Table 4** presents a matrix of the inter-relationship of environmental value (sensitivity) with magnitude that leads to a conclusion on the significance of an effect.

**Table 4 Inter-relationship of sensitivity with magnitude<sup>4</sup>**

|                                   | Magnitude of impact (degree of change) |           |                   |                    |                     |                     |
|-----------------------------------|----------------------------------------|-----------|-------------------|--------------------|---------------------|---------------------|
|                                   |                                        | No change | Negligible        | Minor              | Moderate            | Major               |
| Environmental value (sensitivity) | Very high                              | Neutral   | Slight            | Moderate or large  | Large or very large | Very large          |
|                                   | High                                   | Neutral   | Slight            | Slight or moderate | Moderate or large   | Large or very large |
|                                   | Medium                                 | Neutral   | Neutral or slight | Slight             | Moderate            | Moderate or large   |
|                                   | Low                                    | Neutral   | Neutral or slight | Neutral or slight  | Slight              | Slight or moderate  |
|                                   | Negligible                             | Neutral   | Neutral           | Neutral or slight  | Neutral or slight   | Slight              |

Finally, the suggested relevance of the significance of an effect in relation to decision making is presented in **Table 5**.

**Table 5 Significance of effects in relation to decision making**

| Significance category | Typical description                                                                                                                     |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Very large            | Effects at this level are material in the decision-making process.                                                                      |
| Large                 | Effects at this level are likely to be material in the decision-making process.                                                         |
| Moderate              | Effects at this level can be considered to be material decision-making factors.                                                         |
| Slight                | Effects at this level are not material in the decision-making process.                                                                  |
| Neutral               | No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error. |

<sup>4</sup> Source: Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Modelling*, page 15

## 2. Desk-Based Assessment

---

The Historic England Archive and the Defra *MAGIC* database was consulted to verify the locations and status of designated heritage assets.

Following assessment of topography and intervening development, a study area for designated assets was set at 1km for scheduled monuments and Grade I structures, 500m for Grade II\* and Conservation Areas, and 250m for Grade II structures.

Locations of listed buildings and scheduled monuments are shown on **Figure 4**.



**Figure 4** Scheduled Monuments (orange) and listed buildings (purple)  
© Google base photo

## 2.1 DESIGNATED ASSETS

**No designated assets of cultural heritage importance lie within the boundary of the proposed development.**

### 2.1.1 Scheduled Monuments

No scheduled monuments lie within 1km of the PDA.

Just over 1km to the east is a scheduled blockhouse (List Entry Number: 1005120). The monument includes a 16th century artillery blockhouse surviving as upstanding and buried remains. It is situated on the south bank of the River Thames just north of the Clarendon Royal Hotel. There is no visual or historical connection with the PDA, and it is not considered further.

On the north bank of the Thames, the nearest scheduled monument is also just over 1km north east. Tilbury Fort (List Entry Number: 1021092) is described as “*England’s most spectacular surviving example of a late 17th century coastal fort*”<sup>5</sup>, designed at a time when artillery had become the dominant feature of warfare and therefore built with massive low earthworks, resilient to the shock of bombardment, instead of stone fortifications. The layout and construction were geared to the optimum siting of cannon at the forward batteries which, in conjunction with batteries on the opposing bank of the Thames, could create a field of fire spanning the estuary providing defence for the river itself and the capital.

### 2.1.2 Listed Buildings

No Grade I structures sit within 1km of the PDA.

There are no Grade II\* structures within 500m. The nearest is the Church of St George, Gravesend (715m east), the parish church built in 1731-2 and described as having “*good townscape value*.”<sup>6</sup> There is no visual or historical connection with the PDA, and it is not considered further.

On the north bank of the Thames, 780m north east of the PDA, is the Grade II\* Riverside Railway station and baggage hall, ticket office, and floating landing stage. Completed in 1924 for the Port of London Authority in a neo-Georgian style. The complex closed in 1990, but re-opened in 1995 for leisure cruise use.

One Grade II structure sits within 250m of the PDA (list entry 1396396) which at its nearest point is approximately 145m north west of the proposed tanks and 80m west of the proposed truck loading gantry. Rosherville quay walls, steps and draw dock extend along the waterfront, and are listed along with a WWII mine watching post (**Figure 5**). The quay walls

---

<sup>5</sup> Source: <https://historicengland.org.uk/listing/the-list/list-entry/1021092>

<sup>6</sup> Source: <https://historicengland.org.uk/listing/the-list/list-entry/1089034>

etc were built in 1837 to designs by the architects Kendall and Son for Jeremiah Rosher. They are constructed of coursed stone rubble with ashlar dressings and stuccoed gatepiers and extend to a height of almost 10m. They extend 70 metres either side of the central arch. The WWII mine-watching post is of yellow brick with concrete roof.



**Figure 5 Rosherville quay walls, steps and draw dock**

The official list entry is included at **Appendix A**.

The Quay was built to serve a new town, the inspiration of Rosher, and to be named Rosherville. Various elaborate architectural designs for the Quay survive, including one showing an impressive quay wall with round-headed arch and a very elaborate stone pier with two storey pavilions (**Figure 6**). It appears that only the stone quay wall with steps and arch of this design were constructed and the proposal for a very expensive stone pier was replaced by a cheaper wooden pier.

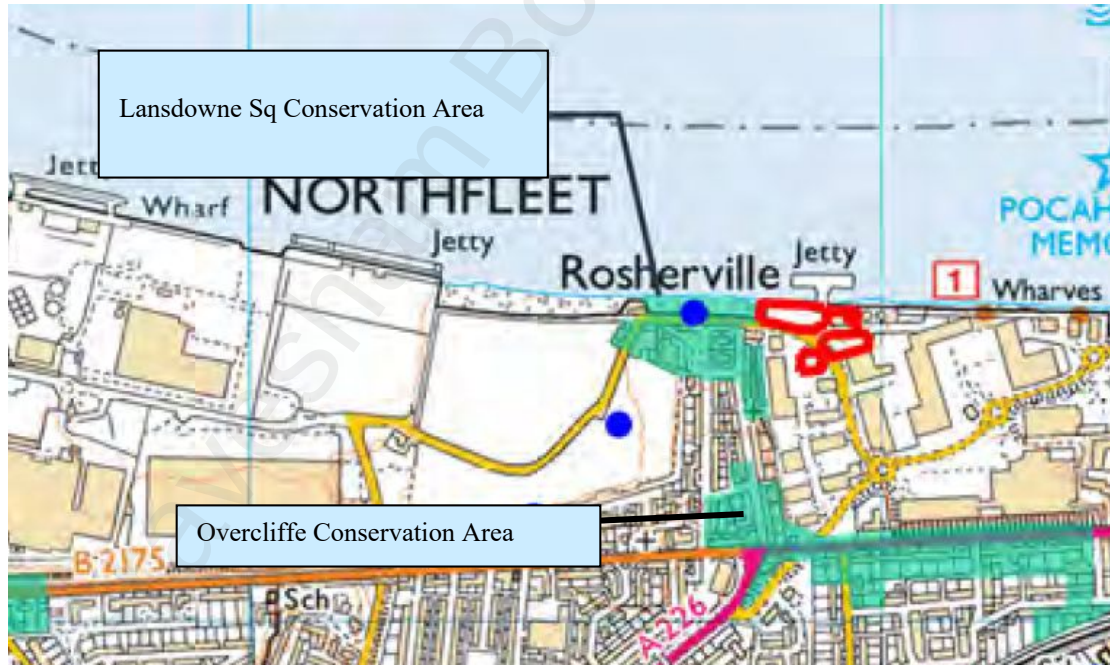
Rosherville is discussed further in Section 2.1.3, below.



**Figure 6** Original architectural designs for Rosherville and Quayside  
© Thames Pilot

### 2.1.3 Conservation Area

Two conservation areas lie within 500m of the PDA. The extent of these is shown on **Figure 7**.



**Figure 7** Conservation Areas

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The **Lansdowne Square Conservation Area**<sup>7</sup> is centred on the historic core of the Rosherville New Town and is at its nearest boundary 120m west of the PDA. This was a small residential development overlooking the River Thames, built from the 1830s onwards on land owned by the Rosher family.

Rosherville was the vision of Jeremiah Rosher, a wealthy local industrialist, who aspired to build a prestigious suburb to Gravesend. The development was planned to cater for businessmen who would be able to commute to London by steamboat from the development's private pier. The area was also associated with the Rosherville Gardens that were laid out in 1837 over old chalk pits next to Lansdowne Square. They became some of the most popular pleasure gardens in Victorian Times and during their mid-19th century heyday were visited by thousands of day-trippers, arriving by steamboat from London at the Rosherville Pier.



**Figure 8 Rosherville gardens circa 1900**

© www.discovergravesham.co.uk

Building works for Rosherville New Town commenced with the construction of Lansdowne Square at the riverside and with residential development along London Road further south, with Burch Road and Pier Road connecting the two parts. It seems that after an initial building phase works came to a halt. The scheme was never fully realised, and much of the land along Burch Road and Pier Road was not developed until about 100 years later with modest terraced housing that has nothing in common with the 19th century ambition for this

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<sup>7</sup> Source: *Lansdowne Square Conservation Area Character Appraisal*. 2009. Gravesham Borough Council

area. The southern part of the Rosherville New Town is today also protected by Conservation Area status, being part of the Overcliffe Conservation Area.

During the 19th century, the Northfleet foreshore transformed to a base for heavy industry that gradually encroached from both sides on Lansdowne Square. While the pleasure gardens eventually fell victim to the industrialisation of the area, much of the original Rosherville residential development and lay-out is still in place and is the focus of the Conservation Area. Lansdowne Square consists of four detached three storey villas arranged symmetrically two behind two, with a wide square next to them. The square once provided access from the pier to the Rosherville Gardens, the entrance of which lay in the south-western corner opposite the pier. Originally, the group of villas and the square were enclosed to the east and west by a terrace of houses, though only the buildings along Pier Road are still in place. The buildings at the western side of the square, comprising the Lansdowne Terrace and the Rosherville Hotel, were demolished in the 1960s.

The architectural composition is best appreciated from the water with the detached villas standing on a raised level with a prominent balustraded terrace to the front. Below that, the riverside lane - The Shore - rises from the east and west culminating in the pier entrance at the highest point of elevation. While the villas make an impression through their scale and arrangement, the Pier Road terrace houses appeal through their rich Italianate architectural embellishment. Despite some significant losses, notably the western enclosure of the square, Lansdowne Square has retained the character of a prestigious 19th century riverside development. This character has been strengthened by the recent restoration of the villas, including the re-building of Nos. 3-4, and the refurbishment of the square (**Figure 9**).



**Figure 9** Recently refurbished buildings in Lansdowne Square

The **Overcliffe Conservation Area**<sup>8</sup> encompasses part of the early 19th century Rosherville New Town development in Northfleet and the mid-19th century houses along Overcliffe which were developed as part of this prestigious suburb, directly to the west of Gravesend Town Centre. The fine, large houses which line the roads are a mixture of villas and terraced residences, some sited to take advantage of the views northwards towards the River Thames.

At its nearest boundary it is 230m south west of the PDA.

To the west, and leading down to the river, Burch Road and Pier Road were laid out as part of the embryonic Rosherville New Town in the 1830s. They feature tall three storey terraced houses set behind small front gardens or basements. The Burch Road houses have retained distinctive architectural features such as wrought iron first floor balconies and elaborate doorcases and porches. The houses in London Road are of plainer design but retain their original built form and coherence as important historic terrace. They date from the 1840s and incorporate a small parade of shops.

The Overcliffe villas, which were built from 1864 to 1870 along the south side of the road, look out over the steep chalk cliffs to the river Thames. Their views to the river are partially obscured by the trees that line the north side of the road, but these trees fortunately also help to hide the retail and industrial sites that now occupy the foreshore below. The built form on the south side of Overcliffe mainly consists of pairs of broad semi-detached villas built over two or three storeys on wide plots. The north side has very little built form due to 19th century excavation of the chalk cliffs. The openness of the uncluttered streetscape is accentuated by the breadth of the highway and the lack of any buildings along the north side of the road.

To the south of Overcliffe, St James's Road is a relatively quiet corner of the Conservation Area and features late 19th century houses that adjoin later residential developments. The semi-detached two storey houses in this road were built to a more modest scale and design than the Overcliffe and Rosherville properties after Gravesend's resort town status diminished towards the end of the 19th century.

The Conservation Area retains much of its original architectural character from the prestigious 19th century residential suburb. The survival of the historic layout and the many historic buildings, together with the dramatic location on the top of chalk cliffs, all provide positive features which justify designation as a conservation area.

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<sup>8</sup> Source: Overcliffe Conservation Area Character Appraisal. 2009. Gravesham Borough Council



**Figure 10** Looking north within Overcliffe Conservation Area

#### **2.1.4 Other Designated Cultural Heritage Sites**

There are no World Heritage Sites, Registered Battlefields or Historic Parks and Gardens within 1km of the PDA.

#### **2.1.5 Non-designated buildings of local interest**

The White House, now the company offices of FM Conway, was the former office and laboratory of the Imperial Paper Mills and built circa 1911. A third floor was added in the 1990s. Although altered, it is of local interest as the main surviving element of the paper mills.



**Figure 11** The White House

## **2.2 ARCHAEOLOGICAL BACKGROUND**

In order put the PDA into its archaeological context, a search of Kent Historic Environment Record (KHER) was carried out for a 500m radius. Information was supplied by Dr Rose Broadley, Historic Environment Record Officer, Heritage Conservation Group, Kent County Council. Her excellent service is gratefully acknowledged, as is permission to allow reproduction of their information and drawings.

Details of investigations, sites and finds lying within 500m of the PDA are discussed below and the locations shown on **Figures 12 and 13**.

### ***2.2.1 Previous archaeological investigations within the PDA***

There have been no formal archaeological events within the PDA prior to work associated with this planning application.

### ***2.2.2 Monuments and finds within the PDA***

There are no recorded sites in the KHER within the PDA. The history of the PDA is discussed below, **Section 2.3**.

### ***2.2.3 Investigations, Monuments and Finds within 500m of the PDA***

The earliest remains within the search area are an antiquarian collection of five Palaeolithic hand axes recovered from the Northfleet shore in the late 19<sup>th</sup> century (TQ67 SW1442) on the western limit of the study area. These axes now form part of the H Stopes collection of flints in the National Museum of Wales, Cardiff. No information is available about their recovery.

To the southeast of the PDA a small assemblage of Mesolithic or early Neolithic flints were recovered during archaeological work at Stuart Road in 2004 (TQ67 SW423) and to the southeast of the PDA a middle to late Bronze Age assemblage of flints, including cores, blades and burnt flint were recovered during a watching brief at the former Seeboard Depot (TQ67 SW291) also in 2004. It is suggested that some of the flints from this group may reflect earlier activity as well. Two undated post holes were also found in the vicinity and may be of similar prehistoric date (TQ67 SW291).

Limited evidence of later Bronze Age into early Iron Age activity was recorded on the Stuart Road site mentioned above (TQ67 SW423) comprising a ditch and a couple of post holes.

A total of ten later Iron Age coins have been recorded by the Portable Antiquities Scheme (MKE67319, 67324, 67326, 67327, 67328, 67330, 67342, 67346, 67370 and 67374) and have been given a four-figure grid reference of TQ64 74. The coins consist of one silver unit, three copper alloy cast potin issues and six gold staters and probably reflect a strong presence in the area during this period. The shrine of Springhead lies about 3km to the southwest of the PDA.

The work at Stuart Road also produced a number of ditches, pits and post holes (TQ67 SW424) of late Iron Age and Roman date. Elements of a ditched Roman field system dated to between 150-370AD were present and two postholes, sealed beneath colluvium, of probable Saxon date were also found. The only other evidence for the Roman period consisted of a few copper alloy objects recovered from the foreshore near the Half Moon Inn, Northfleet in the early Twentieth century (TQ67 SW44) and probably now in the Chantry Museum in Gravesend.

Immediately outside the eastern boundary of the PDA is the recorded location of a Second World War air raid siren and police telephone box (TQ 67 SW 1349), on the south side of Clifton Marine Parade, Gravesend. The siren was to give warning of an approaching air raid and to give the all-clear once raiders had passed and the Police Telephone Box was part of the civil defence communication network for reporting incidents. No details of design and form are known. They probably originated in 1939 to be decommissioned by 1945 and removed early post-war.

The paucity of records for archaeological remains may be a reflection of the rapid and extensive development of land within the study area in a period when only limited archaeological recording would have taken place.

#### ***2.2.4 Archaeological investigations within 500m of the PDA***

A total of 45 events are listed by the KHER.

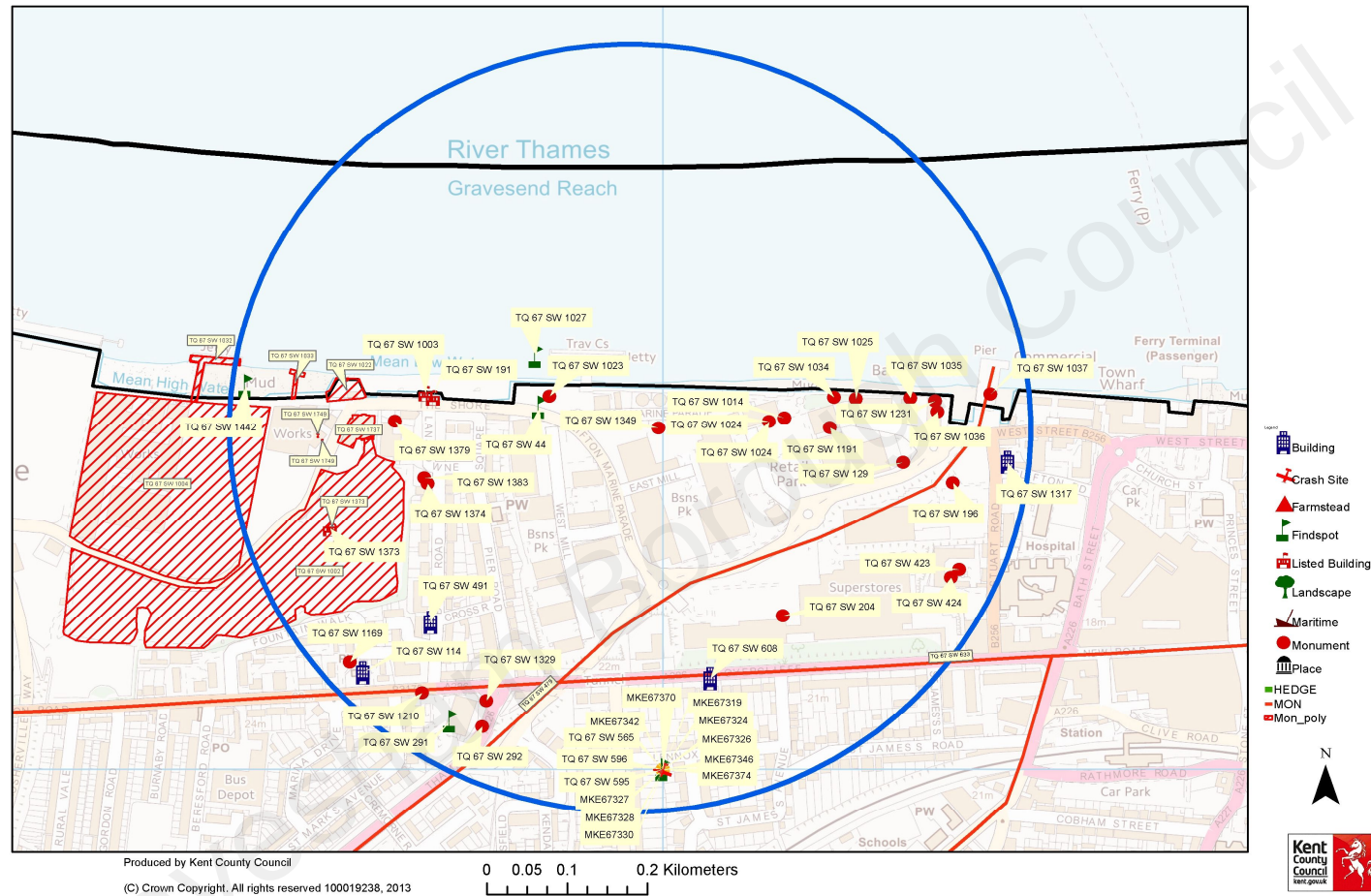
Half relate to either observations of geotechnical test pits (for example EKE17860) or boreholes (for example EKE 17827-17830).

The majority of the archaeological interventions and evaluations have been targeted on the area of the Rosherville Gardens on the western part of the study area (e.g. EKE18261 and 18257), and a further group (EKE9103 and 9831) related to work on Stuart Road to the southeast of the PDA, the results of which are discussed in section 2.2.3.

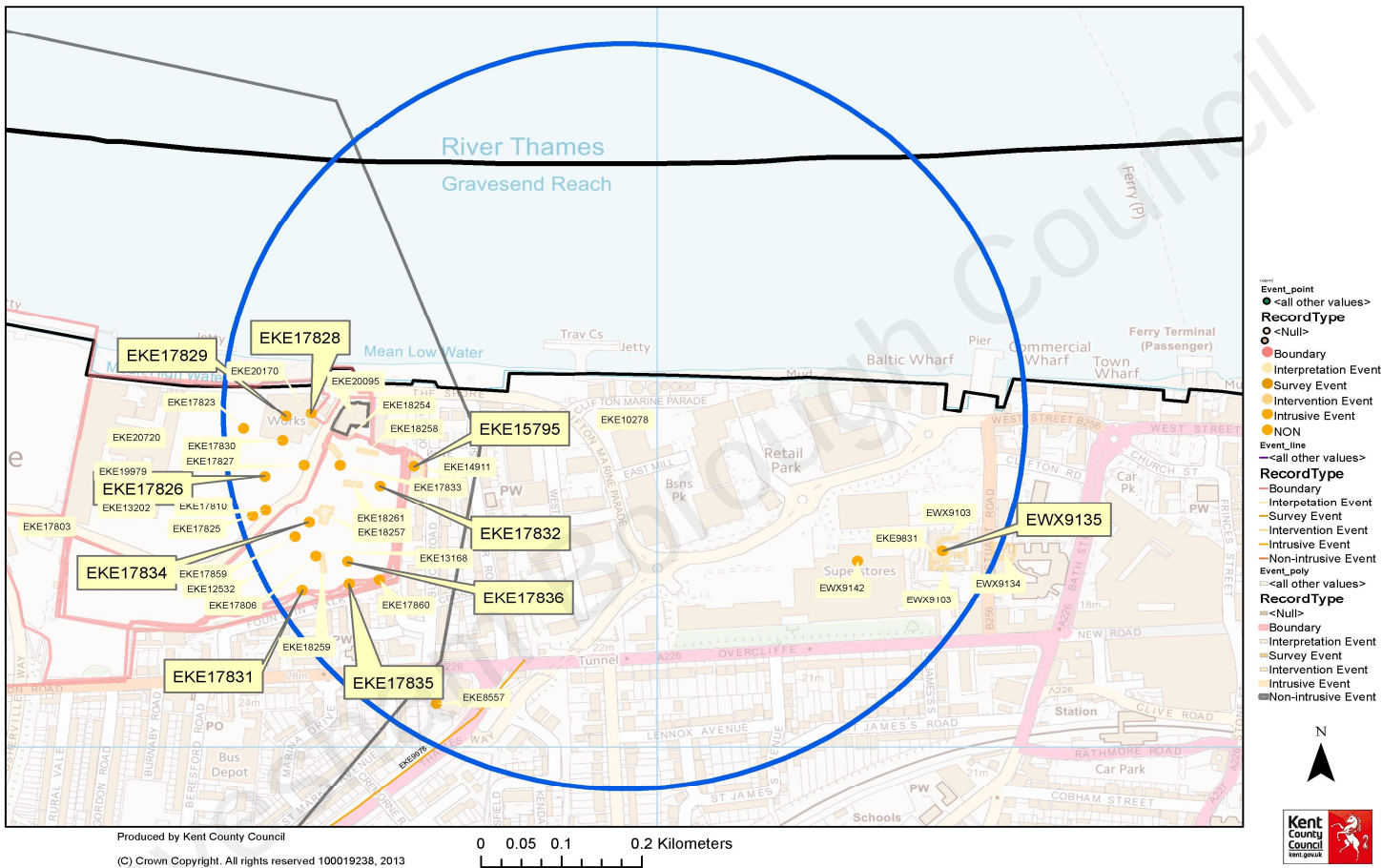
A further record is of a watching brief at the Seeboard Depot (EKE8557) which recorded some flints and another a building recording project of the W T Henley building prior to redevelopment (EKE20095).

Desk-based assessment work of the North Kent Coast was carried out as part of the Rapid Coastal Zone Assessment Survey (EKE10278).

## Kent County Council - Clifton Marine Parade, Gravesend - Monuments



## Kent County Council - Clifton Marine Parade, Gravesend - Events



### Figure 13 Kent HER Events within 500m

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## 2.3 HISTORICAL BACKGROUND

Large-scale Ordnance Survey maps dating back to 1869 were examined. These are reproduced below with a brief commentary of interpretation that has been assisted by a number of internet sources.

In 1869 (**Figure 14**), the PDA is shown to the east of Bycliffes, a large house set back from the Thames with extensive grounds. It was owned by William Fletcher, Director of Gravesend Gas and Water Companies.<sup>9</sup> The PDA was divorced from the house by a mineral railway running on an embankment linking the substantial chalk quarries to the south with its quay on the Thames.



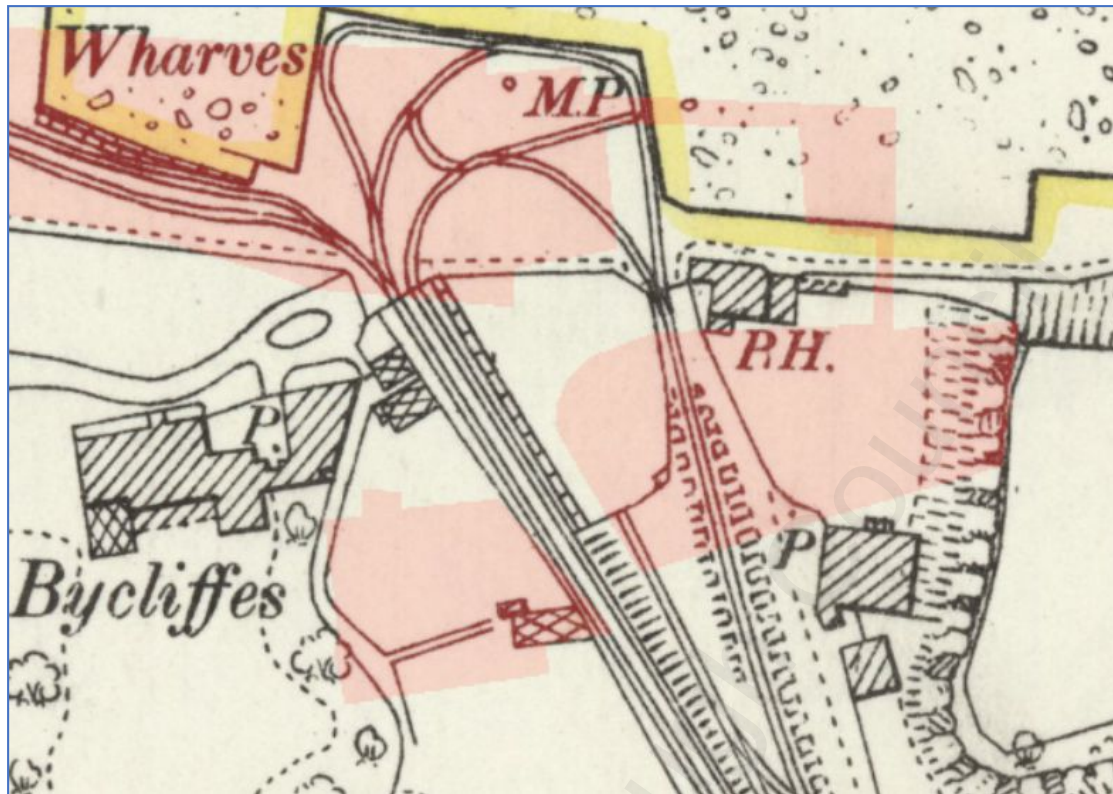
**Figure 14** Ordnance Survey 1869

The PDA and surroundings are shown in good detail on the 1895 OS Map (**Figure 15**). Hachuring on the eastern boundary suggests that the land within the PDA has been lowered in the past, probably associated with mineral extraction. To the south and east are shown two pump houses (marked with a 'P'). The mineral railway is clearly defined and to the north is a public house.

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<sup>9</sup><https://www.britishnewspaperarchive.co.uk/search/results/1900-01-01/1949-12-31?BasicSearch=gravesend&SomeSearch=gravesend&RetrieveCountryCounts=False&PublicTag=classifieds&SortOrder=score>

“Kentishman”: <https://britainfromabove.org.uk/en/image/EAW042090>



**Figure 15 Ordnance Survey 1895**

There is little change on the 1909 map, other than a reorganisation of the mineral railway to the north and west of the PDA.

The Imperial Paper Mills company was formed by the newspaper and comic publishing giant Amalgamated Press Ltd, the umbrella organisation to several publishing operations owned by Alfred Harmsworth, a prominent figure in the British press who had published his first magazine in 1888, acquired the London Evening News in 1894 and launched the Daily Mail title in 1896. The Imperial Paper Mills was to provide newsprint from pulp for Harmsworth's business.

The chosen site belonged to local cement-making firm Tolhurst and Sons which had been at the site since at least the mid-1860s producing over 750 tons of chalk per week that was supplied to Imperial Portland Cement half a mile west at Northfleet.

The Imperial Paper Mills were opened in 1911. The site extended along the edge of the Thames for 1,200-feet and had the capacity to produce 1,500 tons of newsprint a week. A series of huge pitched-roof brown-brick buildings rose from the former lime works' site, linked by an extensive network of tightly-curved standard gauge railway lines. The latter were straddled at various points around the mill by a network of travelling cranes to load/unload railway wagons.

The men who worked at the mill were called up for service in WWI and 54 did not return. A war memorial (**Figure 16**) was erected to their memory on The White House which was the main office building of the paper mill. Today this house's the Applicant's office and a third floor was added in the 1990s. The building also held a memorial plaque (**Figure 17**) for Alfred Harmsworth (1st Viscount Northcliffe), who died on 14th August 1922. The two plaques have been recently stolen.



**Figure 16 WWI Memorial**



**Figure 17 Lord Northcliffe Memorial**

The 1923 OS (**Figure 18**) does not show the works, presumably as the edition was not revised during WWI.

The first edition of the OS to show the works in detail is dated 1932 (**Figure 19**). This shows substantial Mills to either side of the light railway, including on the land that was formerly the house named Bycliffes. The former public house has been demolished and replaced by another pub that was situated within the PDA. A network of railways can be seen.

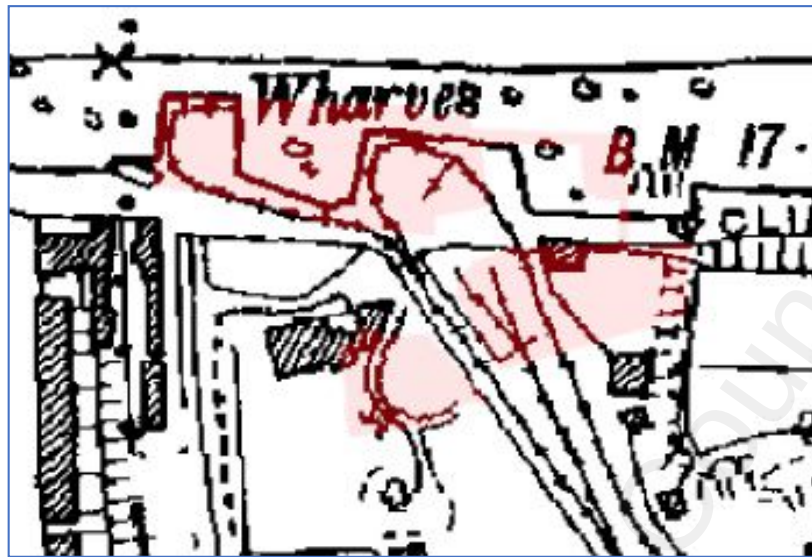


Figure 18 Ordnance Survey 1923

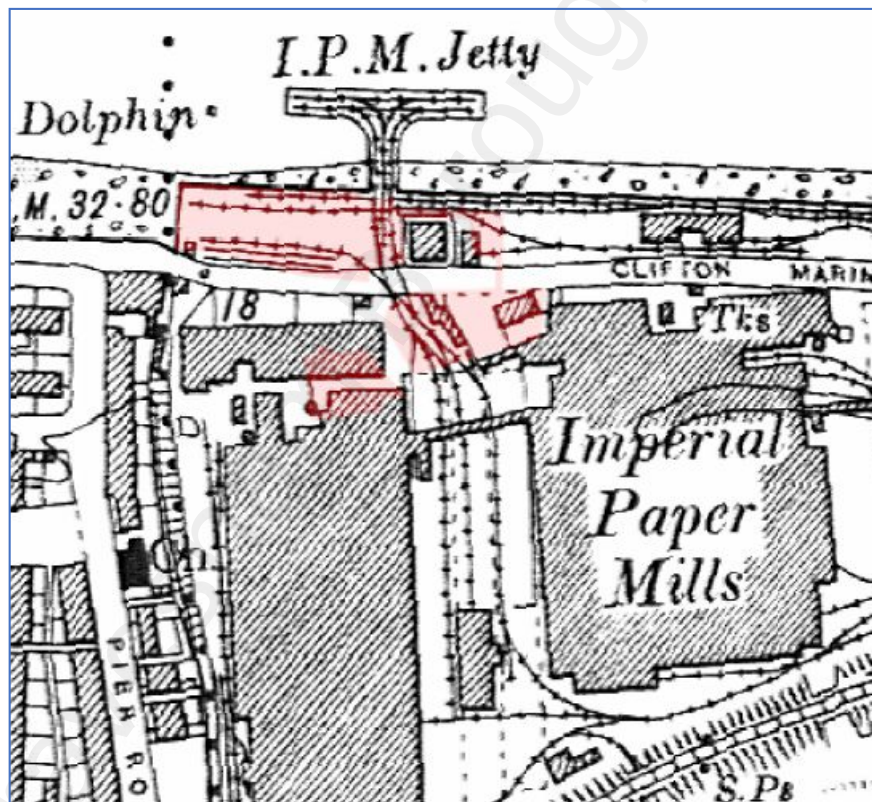


Figure 19 Ordnance Survey 1932

Subsequent editions show some amendments to layout of the mills, but not the PDA. There is also a good set of photographs of the mills from the circa 1960s, including a view towards the PDA (**Figure 20**)

The mills closed in 1978.



**Figure 20** View south of the Imperial Mills, circa 1960s, approximate location of proposed bitumen tanks

The public house that used to be situated within the PDA was the Hit or Miss. The original pub was located to the north west as can be seen on the early editions of the OS. A new building was constructed in 1929 within the PDA. It closed in 1987 and was demolished.

A number of photographs may be found on the internet of the original building<sup>10</sup> but only a grainy thumbnail of the replacement that was within the PDA. (**Figures 21 and 22**)

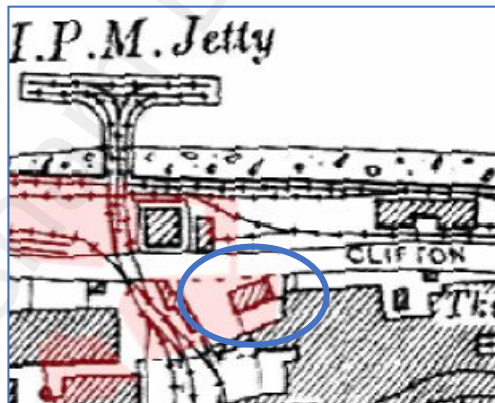
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<sup>10</sup> <https://pubwiki.co.uk/KentPubs/Gravesend/HitorMiss.shtml>

<http://www.dover-kent.com/2014-project-c/Hit-or-Miss-Gravesend.html>



**Figure 21** Hit and Miss pub



**Figure 22** Location of Hit and Miss pub (circled in blue)

## 2.4 SITE VISIT

The PDA was visited in May 2021 by Ian Meadows of AJA in bright conditions. The visit also examined the potential effects upon the setting of designated assets and specifically the two Conservation Areas.

The only remnants of the Imperial Paper Mills that are visible are some railway tracks embedded in concrete (that are most likely those that can be seen on Figure 20) and a stub of walling, **Figures 23-24**. The rest of the PDA has largely resurfaced for car parking.



**Figure 23** Looking east across PDA showing railway tracks



**Figure 24** Looking south across PDA showing stub of walling (to right) and railway tracks

### 3. Assessment of Setting of Designated Assets

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#### 3.1 INTRODUCTION

Setting is defined in the National Planning Policy Framework (NPPF) as:

*"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 the asset, may affect the ability to appreciate that significance or may be neutral."*

GPA3 states that:

*"The setting itself is not designated. Every heritage asset, whether designated or not has a setting. Its importance, and therefore the degree of protection it is offered in planning decisions, depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation."*

The key policy guidance is *Historic England: The Setting of Heritage Assets (GPA3)*.

This recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- 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 the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

The assessment followed that methodology.

A site visit was carried out in May 2021. The current setting of the one listed structure and two conservation areas was examined and views to and from them assessed, without entering onto private land. Google Earth was also used as a tool to understand setting and context within the wider townscape.

### 3.2 STEP 1: IDENTIFY WHICH HERITAGE ASSETS AND THEIR SETTINGS ARE AFFECTED

As described in **Section 2**, three assets are situated within 500m of the PDA that could potentially be affected by the proposed development.

**Table 6 Heritage Assets within 500m**

| Asset                                                                                                                        | National Heritage List reference | Distance from PDA boundary          |
|------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------------|
| Rosherville quay walls, steps and draw dock extend along the waterfront, and are listed along with a WWII mine watching post | 1396396                          | 145m (tanks)<br>80m (truck loading) |
| Lansdowne Square Conservation Area                                                                                           | n/a                              | 120m                                |
| Overcliffe Square Conservation Area                                                                                          | n/a                              | 230m                                |

### 3.3 STEP 2: ASSESS THE DEGREE TO WHICH THESE SETTINGS AND VIEWS MAKE A CONTRIBUTION TO THE SIGNIFICANCE OF THE HERITAGE ASSET(S) OR ALLOW SIGNIFICANCE TO BE APPRECIATED

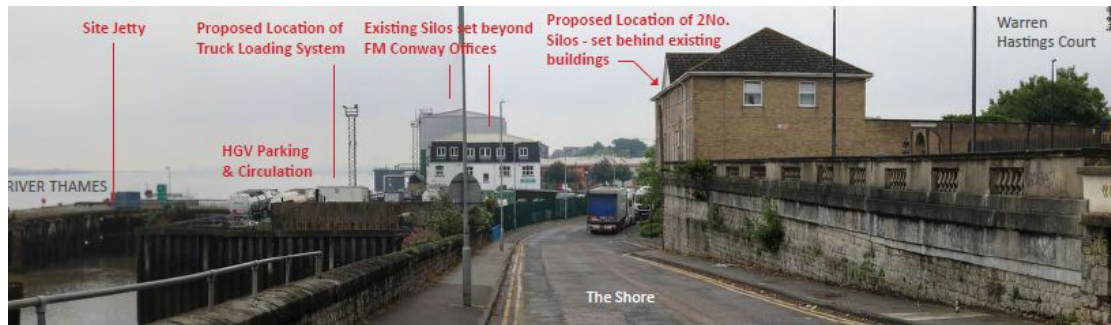
#### 3.3.1 *Rosherville quay walls etc*

The historic setting of this linear listed structure is defined by its function – that is servicing pleasure boats on the River Thames and later providing a defensive position overlooking the Thames. Its setting to the rear (the south) is Lansdown Square, and the houses and Rosherville Gardens that were accessed from the quay. It sits on the eastern edge Lansdown Square Conservation Area.

At the time of its construction, the listed structure was physically and visually divorced from the proposed location of the bitumen tanks by a mineral railway running on an embankment linking the substantial chalk quarries to the south with its quay on the Thames. This quay lay to the east of the listed structure and now forms part of the Imperial Wharf.

Today, as can be seen on **Figure 25**, there are no views of the proposed location of the bitumen tanks from the central part of the listed structure due to a 1970s era block of flats. From the eastern limit of the listed structure there are filtered or screened views (**Figure 26**) of the proposed tanks. There would be clear views of the proposed truck-loading gantry.

The reverse view from the proposed tanks is shown on **Figure 27**.



**Figure 25** Looking towards PDA from central part of the listed quay walls (Kedd Ltd)



**Figure 26** Looking towards PDA from eastern end of the listed quay walls



**Figure 27** Looking towards listed quay walls from the PDA

### 3.3.2 Lansdowne Square Conservation Area

The setting of the Conservation Area is centred on the historic core of the Rosherville New Town, a small residential development overlooking the River Thames, built from the 1830s onwards (**Figures 28 and 29**). The scheme was never fully realised, and much of the land along Burch Road and Pier Road was not developed until about 100 years later with modest terraced housing.

The key part of the Conservation Area is focused northwards towards the Thames, from where wealthy businessmen who owned the grand villas and pleasure seekers alike arrived.



**Figure 28** Looking north towards Thames from the eastern part of the Lansdowne Square Conservation Area



**Figure 29** Looking north towards Thames from the western part of the Lansdowne Square Conservation Area



**Figure 30** The same view as Figure 29 in the early 20<sup>th</sup>

The land of the PDA was not within the setting of the Conservation Area. It comprised industrial land – initially a chalk quarry (at the time of the Rosherville vision) and later a substantial paper mill. The Thameside part of the PDA was a wharf for loading chalk and later paper onto boats and featured a network of railways. This contrasted with the peaceful, leafy Lansdowne Square and Rosherville Gardens, the entrance of which lay in the south-western corner of the Square opposite the pier. Originally, the group of villas and the square were enclosed to the east and west by a terrace of houses, though only the buildings along Pier Road are still in place. The rear of these face onto the PDA.

There are no views from the core of the Conservation Area to the PDA at ground level. It would appear that views are limited to upstairs windows from the rear of properties on Pier Road.

As can be seen on views towards the rear of Pier Road from the PDA, the land between is dominated by modern commercial development (**Figure 31**).



**Figure 31** Looking west towards the rear of Pier Road (arrowed) from the proposed location of the bitumen tanks

Although visible from upper floor windows on the rear elevations of Pier Road, the proposed tanks would blend in with the industrial landscape, and the form and mass of the existing tanks and commercial development adjacent (**Figure 32**).



**Figure 32** At ground level on Pier Road, looking north east towards the the proposed location of the bitumen tanks (arrowed)

The eastern approach to the Conservation Area is along Clifton Marine Drive. This is highly developed with commercial and industrial development (**Figure 33**).



**Figure 33** Looking west towards the Conservation Area (rear of Pier Road arrowed blue) with the proposed location of the bitumen tanks (arrowed red)

The proposed truck-loading gantry would be clear in views on the approach to the Conservation Area, although as it is situated on a corner and obliquely orientated, the Conservation Area and the facility would not be viewed in the same visual envelope (**Figure 34**).



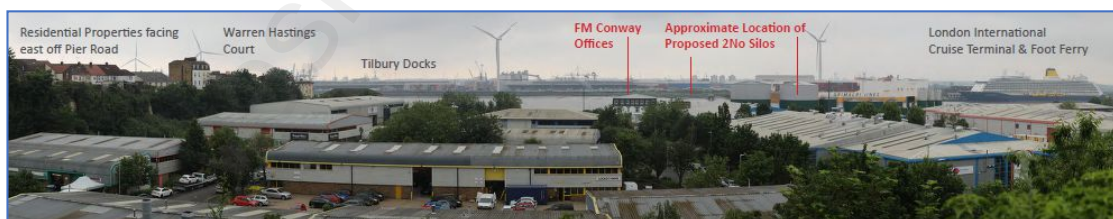
**Figure 34** Looking west towards the Conservation Area with the proposed location of the truck loading gantry (arrowed red)

### 3.3.3 Overcliffe Conservation Area

The Conservation Area encompasses part of the early 19th century Rosherville New Town and other mid-19th century houses along Overcliffe which were built from 1864 to 1870 along the south side of the road, looking out over the steep chalk cliffs to the river Thames. Their views to the river are partially obscured by the trees that line the north side of the road, but these trees also help to hide the retail and industrial sites that now occupy the foreshore below.

When the houses were built, the land between Overcliffe and the Thames was dominated by chalk quarries. By 1911, the whole landscape facing towards the Thames was dominated by the Imperial Paper Mills. Today, the land between Overcliffe and the Thames is a mixture of industrial and commercial development and infrastructure

**Figure 35** shows a worst-case scenario – that is a view from the northern side of Overcliffe at a garage dealership, rather than from the location of the residential properties on the southern side of the road.



**Figure 35** Looking north towards PDA from northern side of Overcliffe (Kedd Limited)

There would be no views at ground level of the proposed development from the villas on Overcliffe. Although not accessible, we do not consider that views of the proposed development would be possible from upstairs windows. This is because the villas stand back from the edge of the cliff and views are likely to ‘fly over’ the industrial development below towards the Thames in the distance. Even if there are views of the proposed development, the massing will be completely absorbed into the Thameside industrial landscape.

### 3.4 STEP 3: ASSESS THE EFFECTS OF THE PROPOSED DEVELOPMENT, WHETHER BENEFICIAL OR HARMFUL, ON THE SIGNIFICANCE OR ON THE ABILITY TO APPRECIATE IT

The key factor is to determine the effects upon significance and how that can affect our ability to appreciate the assets. Effects may be visual or contextual (such as historical), and the current setting is also important.

From the above assessment, we reached the conclusions set out in **Table 7**. This is before any mitigation is designed in, which is addressed in Step 4, below.

**Table 7** Assessment of setting and magnitude of change in significance

| Asset                                                                                                                        | Current setting                                                                                                           | Change and Magnitude                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rosherville quay walls, steps and draw dock extend along the waterfront, and are listed along with a WWII mine watching post | On side of River Thames. Industrial development to the east. Modern housing opposite.                                     | <p><u>Proposed tanks</u></p> <p>No views from all but most eastern limit of listed structure. From here, views filtered and partly screened by intervening development. No change in setting. No change in ability to appreciate significance.</p> <p><u>Proposed truck loading gantry</u></p> <p>Clear views of moderate magnitude. Massing will be partially absorbed by the White House and industrial development adjoining.</p> <p>Moderate adverse effect on setting.</p> <p>No change in ability to appreciate significance.</p> |
| Lansdowne Square Conservation Area                                                                                           | Tightly defined asset that faces the Thames, as historically. Much altered townscape since its construction with industry | Views of PDA from upstairs windows on rear elevation of houses on Pier Road, but otherwise no perceptible                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Asset                               | Current setting                                                                                                                                                                                     | Change and Magnitude                                                                                                                                                                                  |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | immediately to the east and construction on former Rosherville Gardens to the west.                                                                                                                 | intervisibility except for from listed structure above. Absorbed into existing industrial landscape. Overall adverse effect of negligible magnitude. No change in ability to appreciate significance. |
| Overcliffe Square Conservation Area | Significant road noise and traffic movement. Otherwise immediate setting is largely unchanged except for modern car sales. Below – in the former quarry – is commercial and industrial development. | No views at ground level. Views from upstairs windows unlikely. Overall adverse effect of negligible magnitude. No change in ability to appreciate significance.                                      |

### **3.5 STEP 4: EXPLORE WAYS TO MAXIMISE ENHANCEMENT AND AVOID OR MINIMISE HARM**

The location of the bitumen tanks has been amended from initial plans that had situated them on the vacant riverside plot. This will help to reduce their visibility and absorb their mass into the surrounding commercial and industrial development. The proposed truck-loading gantry has been orientated obliquely to reduce its massing when viewed from the listed quay walls.

### **3.6 STEP 5: MAKE AND DOCUMENT THE DECISION AND MONITOR OUTCOMES**

The residual effects taking into account the proposed layout are documented below, **Table 8**.

## 4. Impacts and Mitigation

---

### 4.1 DIRECT IMPACTS

The PDA has been disturbed by both historic quarrying and the construction and demolition of the Imperial Paper Mills. The only remnants of industrial archaeology remaining are rail tracks embedded in concrete that would have linked the Imperial Paper Mills to its wharf.

### 4.2 INDIRECT IMPACTS

An assessment has been carried out (Section 3) using methodology set out in GPA 3. It is concluded that there would be no change on our ability to appreciate significance of the three heritage assets, which is the test set by GPA3.

### 4.3 MITIGATION AND PUBLIC BENEFIT

A photographic record of the rail tracks should be made and their location verified against historic plans. A report should be submitted to the Kent HER that puts the tracks in their historical context.

A local museum or group of enthusiasts (such as Kent Rail) may be interested in retaining the rails themselves.

Consideration should be given to the erection of an interpretation board that can be viewed from the public footpath on Clifton Marine Drive that sets out the industrial history of the site.

The men who worked at the mill were called up for service in WWI and 54 did not return. A war memorial was erected to their memory on The White House which was the main office building of the paper mill. Today this house's the Applicant's office and a third floor was added in the 1990s. The building also held a memorial plaque for Alfred Harmsworth (1st Viscount Northcliffe), who died on 14th August 1922. The two plaques have been recently stolen.

A replica or new version of the war memorial should be made and reinstated. The building also held a memorial plaque to 1st Viscount Northcliffe and it may be possible to replicate this.

## 5. Evaluation of Significance of Effects

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The significance of an effect should be identified, in accordance with the best practice. This is achieved using the methodology set out in **Section 1.5** and **1.6**, assessed in **Section 3** and incorporating the mitigation set out in **Section 4**. These are often referred to as residual effects.

The results of the evaluation of significance are drawn together in **Table 8**, below, together with the rationale behind the evaluation.

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Gravesend Borough Council

**Table 8** Evaluation of residual effects upon heritage assets (source DRMB *op cit*)

| Direct / Indirect                                                             | Asset                                 | Sensitivity | Magnitude of change                                      | Significance of Effect  | Relevance to Decision making                                                                                 |
|-------------------------------------------------------------------------------|---------------------------------------|-------------|----------------------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------|
| <b>Direct effects</b>                                                         | Statutorily Protected Heritage Assets | High        | No change                                                | Neutral                 | No change                                                                                                    |
|                                                                               | Archaeology<br>Rail lines             | Low         | Minor                                                    | Slight                  | Not a material factor in the decision-making process                                                         |
| <b>Indirect effects</b><br>upon setting of designated assets and significance | Quay Walls etc<br>Grade II            | Medium      | No change (tanks)<br><br>Moderate (truck loading gantry) | Neutral<br><br>Moderate | Not a material factor in the decision-making process<br><br>Can be considered in the decision-making process |
|                                                                               | Lansdowne Square<br>CA                | Medium      | Negligible                                               | Slight                  | Not a material factor in the decision-making                                                                 |
|                                                                               | Overcliffe<br>CA                      | Medium      | Negligible                                               | Slight                  | Not a material factor in the decision-making                                                                 |

## 6. Conclusion

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The potential for direct effects upon archaeology and indirect effects upon offsite statutorily designated assets has been assessed within the framework of national planning policy and guidance, and saved policies in the Gravesham Local Plan Core Strategy 2014.

Specifically, this assessment has been undertaken in line with paragraph 194 of NPPF:

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance....*

This assessment has concluded that there would be

- minor effects of slight significance upon archaeology
- an adverse effect of moderate magnitude upon views of a proposed truck-loading gantry from a Grade II listed quay wall and associated structures
- a negligible adverse effect of slight significance upon views from the core of Landsdowne Square Conservation Area and Overcliffe Conservation Area.

There would be no effect upon our ability to appreciate the significance of any designated assets, the test set by Historic England.

## Appendices

Gravesend Borough Council

## **Appendix A**

### **Rosherville Quay Walls, Steps, Drawdock and WWII Mine Watching Post**

#### **Official list entry**

Gravesend Borough Council

# Official list entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 1396396

Date first listed: 06-Jan-2011

Statutory Address 1: ROSHERVILLE QUAY WALLS, STEPS, DRAWDOCK AND WWII MINE WATCHING POST, THE SHORE

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

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

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

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

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

## Location

Statutory Address: ROSHERVILLE QUAY WALLS, STEPS, DRAWDOCK AND WWII MINE WATCHING POST, THE SHORE

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

County: Kent

District: Gravesham (District Authority)

Parish: Non Civil Parish

National Grid Reference: TQ 63704 74490

## Reasons for Designation

Listable at Grade II.

## Details

742/0/10020 THE SHORE 06-JAN-11 Rosherville quay walls, steps, drawdock and WWII mine watching post

II Quay walls, steps, drawdock and attached WWII mine watching post. 1837, designed by the architect H.E.Kendall (1776-1875) and his son Henry Edward Kendall, Junior for Jeremiah Roshier. The attached mine watching post is of circa 1940. The 1960s concrete reinforcement to the sides of the platform is of lesser interest.

**MATERIALS:** The quay walls are constructed of coursed stone rubble with ashlar dressings and stuccoed gatepiers. The steps are of York stone. The drawdock has lower walls of coursed stone but clunch to the rear wall and the upper part is of stock brick in English bond. The WWII mine-watching post is of yellow brick with concrete roof.

**PLAN:** Linear quay walls with central entrance which has steps leading down to the drawdock, which extends underneath the road.

**DESCRIPTION:** The quay walls rise to about 9.6 metres high in the centre, sloping down at the sides. They extend 70 metres either side of the central arch, with stone coping, patched in places with cement, and in the centre are two stuccoed gate piers with pyramidal stone caps linked by cast-iron railings. The western side terminates in a stone pier with pyramidal caps but the eastern pier is missing. There are two raised stone bands and a round-headed culvert on the western side. The central entrance leads to two flights of York stone steps, descending either side of a 7-metre-high-round-headed arch with ashlar voussoirs. Attached to the west side of the arch is a World War II mine watching post, constructed of yellow brick in English bond with flat concrete roof, flat-arched entrance and window opening. In front of the large arch is a projecting platform with a smaller round-headed arch about 5 metres high, also with ashlar voussoirs, the sides of the platform encased in 1960s concrete. The drawdock is approximately 7 metres high, 5 metres wide and 20 metres deep. There are a series of putlog holes in the brickwork to the north river-facing end, providing evidence of a former room at this level. The landward or south end roof terminates in a semi-circular dome and is lined in clunch. A missing section of brick and stonework to the western side of the rear wall reveals a further brick wall behind. Remains of stone structures in the side walls towards the rear are thought to be the remains of winches used for hauling boats into what was effectively a drawdock.

**HISTORY:** The quay walls and drawdock were constructed during the 1830s as part of Rosherville New Town. Jeremiah Roshier (1765-1848), born in Rotherhithe, saw the potential of chalk excavation along the Thames at Northfleet for use in the manufacture of cement for the building industry. By marriage to the daughter of Benjamin Burch he acquired a large property with grounds called Crete Hall and had the idea of building a new town, taking advantage of Gravesend's popularity as a resort town with Londoners visiting for the day by steamboat or buying a house in the area. Roshier started building some new houses in 1830, designed for business men who could travel to London by steamboat. In the Gravesend and Milton Journal of 1 August 1835 the architect H. E. Kendall was advertising building plots at Rosherville. In the same journal of 1 July 1837 the 'stone building of the present pier' is mentioned, which confirms that the stone quay walls and a wooden pier were built by that date. Jeremiah Roshier had just leased the pier to an unnamed businessman connected with the steamboat company. Mr Kendall was employed to lay out an exsplanade and build a hotel. Various elaborate architectural designs by him survive, one showing an impressive quay wall with round-headed arch and a very elaborate stone pier with two storey pavilions. It appears that only the stone quay wall with steps and arch of this design were constructed and the proposal for a very expensive stone pier was replaced by a cheaper wooden pier. A print of Setember 1844 shows the quay walls, central arch and attached wooden pier with the Italianate style Rosherville Hotel on the explanade behind.

Rosherville New Town was not as successful as Jeremiah Roshier hoped and in 1837 he leased the large excavated chalk pit for 99 years to George Jones, a businessman from Islington who formed the 'Kent Zoological and Botanical Gardens Company. From 1842 Rosherville Gardens were a great success, mainly because of day visitors from London, arriving by steamer at Rosherville pier. However, after a successful three or four decades, decline was precipitated by the sinking of the Princess Alice paddle steamer with great loss of life in 1878 and the rise of affordable train trips to the seaside. In 1886 a railway station, Rosherville Halt, was constructed specifically to bring visitors to Rosherville Gardens and took some trade from the pier. In 1900 Rosherville Gardens went bankrupt and, despite re-opening following changes in 1903, continued to lose money. The pleasure gardens closed in 1913 and never re-opened.

On the 1863 Ordnance Survey map the area of the quay is marked 'quays' and in the centre Rosherville Pier is marked with a projecting section at the river end. Rosherville Pier is shown on the 1898 map, although by that date the projecting section on the end has been lengthened. By the 1910 map the projecting section at the end is entirely missing and the structure is now marked 'Rosherville Pier (Disused)'. The pier no longer exists.

During the Second World War a mine watching post was constructed adjacent to the western steps of the quay. In the 1960s the lower steps to the beach were enclosed in concrete.

SOURCES Gravesend and Milton Journal, 1 August 1835. Gravesend and Milton Journal, 1 July 1837. Newman, J, The Buildings of England. West Kent and the Weald (1976), 438. Curl, J, S, Oxford DNB entry on H. E. Kendall. Smith, L 'The place to spend a Happy Day' (Gravesend Historical Society 2006)

REASONS FOR DESIGNATION The Rosherville quay walls, steps, drawdock and WWII mine watching post are designated at Grade II for the following principal reasons: \* Architectural interest: impressive c.1837 stone quay walls, drawdock and steps to a Thames pier at Rosherville, designed by the eminent architect H. E. Kendall. It is the only marine structure designed by this architect. \* Degree of intactness or alteration: The quay walls, steps and drawdock survive substantially intact. The wooden pier no longer survives. \* Historic interest: This is the only surviving structure of the 1830s new town, Rosherville, and it provided travel to the very popular pleasure gardens, Rosherville Gardens, between 1837 and 1913. The attached WWII mine watching post is evidence of a further use at a later historical period.

## Legacy

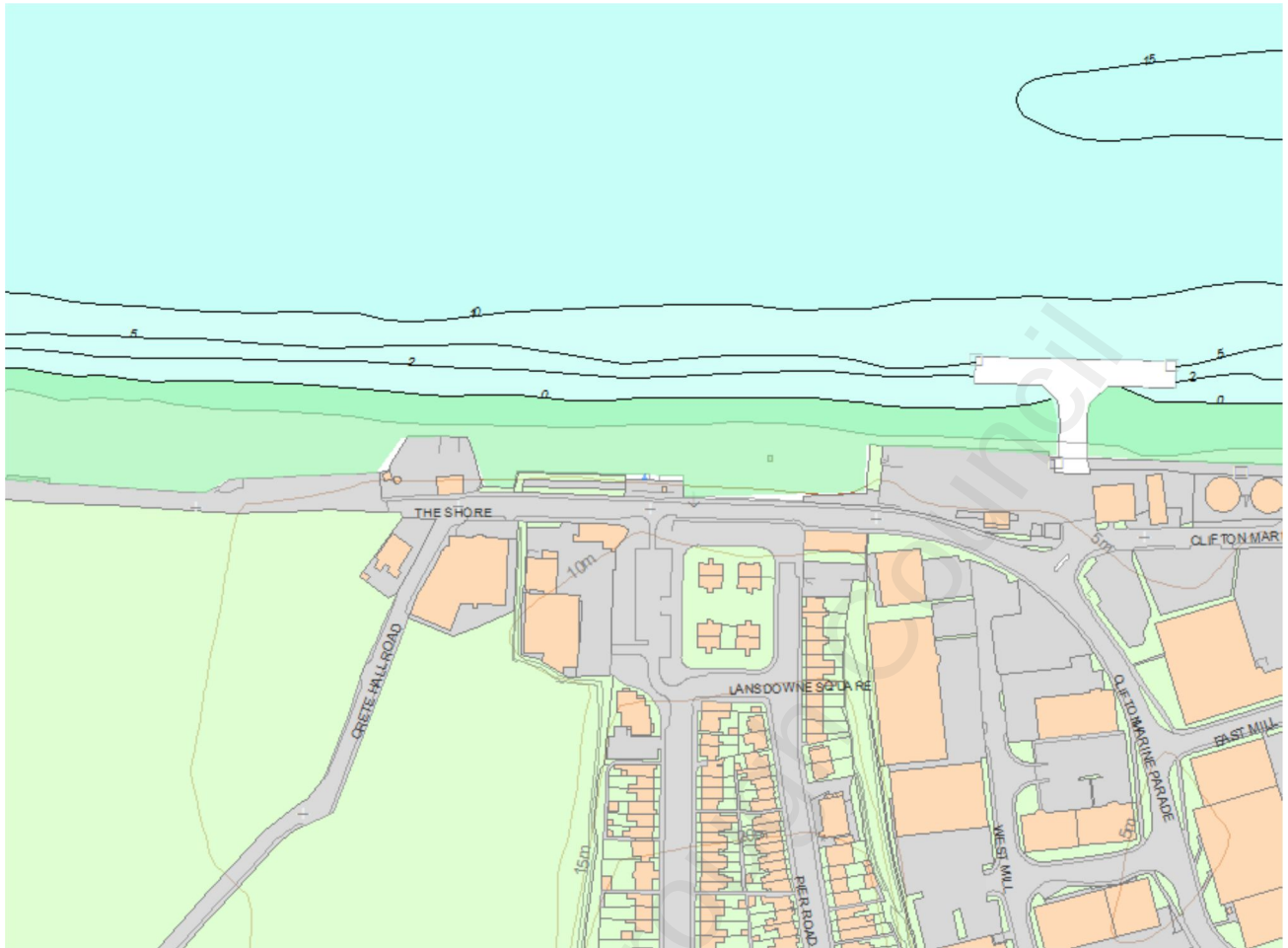
The contents of this record have been generated from a legacy data system.

Legacy System number: **508405**

Legacy System: **LBS**

## Legal

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



## Map

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End of official list entry



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