

Heritage Statement

Land West of School Lane, Higham,
Gravesham

February 2026

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Project	
Land West of School Lane, Higham	
Client	
M Scott Properties Ltd	
Job Number	Date
4887	February 2026

1. Introduction

- 1.1

This Heritage Statement has been prepared by Smith Jenkins Planning & Heritage on behalf of M Scott Properties Ltd in support of the proposed outline development at Land West of School Lane, Higham, Gravesham (hereafter referred to as ‘the Site’). The proposals comprise an outline residential development of up to 50 houses with associated access off School Lane and landscaping.
- 1.2

The Site does not contain any designated or non-designated heritage assets, however there are several heritage assets in the surrounding landscape, the setting of which is a material consideration in the planning process.
- 1.3

A Site visit was undertaken in June 2025 when the key relationships between the Site and the heritage assets in the vicinity were observed. Smith Jenkins Heritage have advised the applicant on the heritage opportunities and constraints relating to the potential development of the Site to mitigate potential harm to the identified heritage assets.
- 1.4

Paragraph 207 of the National Planning Policy Framework (NPPF) 2024 sets out the information requirements for determining applications and states that:

*‘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’.*¹
- 1.5

In response to the NPPF, Section 2 of this report identifies the heritage assets which may be affected by the application proposals, Section 3 provides proportionate statements of significance for the heritage assets identified. These are relative to the scale, nature and effect of the proposals. This Heritage Statement has been prepared in line with Historic England's Advice Note 12 'Statements of Heritage Significance', published in October 2019.
- 1.6

Section 4 provides an assessment of the application proposals on the significance of the identified heritage assets based on national, regional and local policy and guidance. The assessment of impact has been undertaken with regard to paragraphs 212–216 of the NPPF, which establish the statutory weight to be given to the consideration of impacts for designated and non-designated heritage assets. The Heritage Planning Policy context for the consideration of these proposals is set out in Appendix A. This includes the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, regional and local planning policy.



Figure 1.1 - A view over the Site

¹ NPPF (2024)

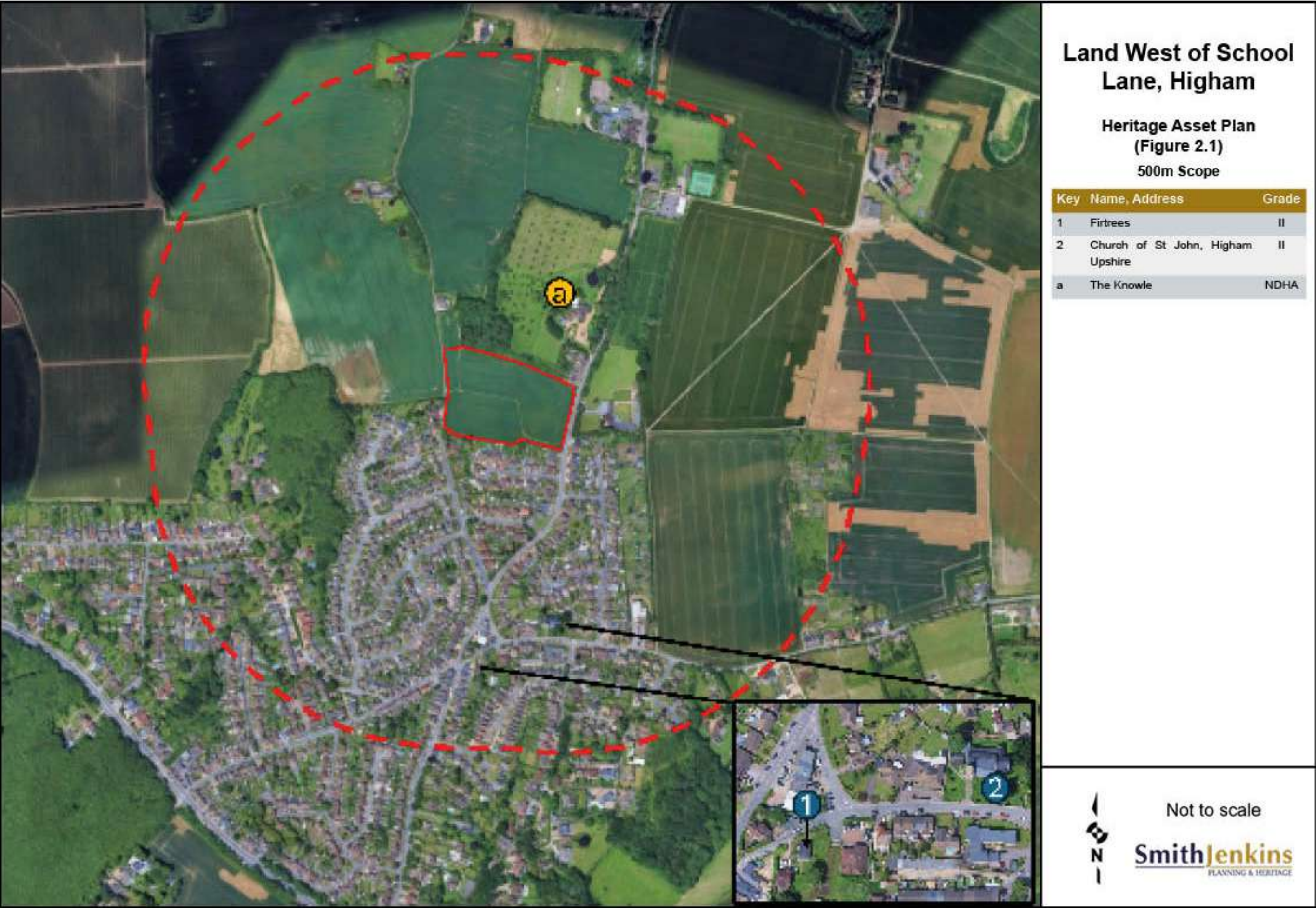
2. The Heritage Assets

- 2.1 A heritage asset is defined by the NPPF as:
- ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)’¹*
- 2.2 There are a number of designated and non-designated heritage assets within the vicinity of the Site, and a scoping exercise has been undertaken to identify which assets have the potential to be impacted by the proposals.
- 2.3 For the initial scoping assessment, a 500m study area was selected for the identification of the surrounding designated and non-designated heritage assets. The locations of the identified assets in relation to the Site are illustrated in the heritage asset plan at Figure 2.1. For each of the identified assets, the scoping assessment considered:
- its significance,
 - the contribution that setting makes to its significance, and
 - the likelihood of any impacts from the proposals, as determined through their potential intervisibility or historic relationship with the site.
- 2.4 Following the scoping assessment, those with the potential to be impacted by the proposed development at the Site have been scoped in and taken forward for further assessment.
- Designated Heritage Assets**
- 2.5 A Designated Heritage Asset is described by the NPPF (2024) as:
- ‘A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation’²*
- 2.6 Such assets are statutorily identified as having a level of heritage (architectural and/or historic) interest to justify designation. There are then particular procedures in planning decisions to ensure that their special interest is preserved or enhanced.

- Listed Buildings**
- 2.7 Two listed buildings were identified within the 500m study area, the Grade II listed ‘Church of St John, Higham Upshire’ (NHLE: 1051091) and the Grade II listed ‘Firtrees’ (NHLE: 1350228), which are both identified in Figure 2.1 overleaf.
- 2.8 Following a Site Visit, which was undertaken in June 2025, the Grade II listed ‘Church of St John, Higham Upshire’ has been scoped in for further assessment due to visibility of the church spire when positioned in the Site, looking south.
- 2.9 Due to there being no visibility between the Firtrees and the Site, it has been scoped out of further assessment as its significance does not have the potential to be impacted as a result of any redevelopment of the Site.

- Non-Designated Heritage Assets**
- 2.10 The NPPF identifies that heritage assets not only include those which are designated (often with statutory protection), but also those assets identified by the local planning authority which could include local listing or buildings of townscape merit. Any such designation, for the purposes of the NPPF, are considered to constitute non-designated heritage assets (NDHA's).
- 2.11 Gravesham Council does not currently maintain a Local List but advises that consideration is to be given as to whether buildings or features should be treated as such on a case-by-case basis.
- 2.12 During the Site visit, The Knowle was identified as a potential NDHA. The Knowle is a former country house and wedding venue located to the north of the Site and is identified on Higham Parish Council’s website as a “Building of Note in Higham”. It is considered that it holds a degree of interest to warrant its identification as a NDHA and will therefore be scoped in for further assessment.

¹ NPPF (2024) Annex 2: Glossary (p.73)
² NPPF (2024) Annex 2: Glossary (p.72)



3. Historic Development

History of Higham

- 3.1
- The Parish of Higham lies between the River Thames and the North Downs, positioned roughly halfway between Gravesend and the Medway towns in Kent. The name "Higham," derived from Old English, means "high village". The village developed in two distinct areas: the original Saxon settlement in the north, now known as Lower Higham, and a newer community to the south, known as Higham Upshire. This southern area expanded over time along the main road connecting Gravesend to Rochester, gaining both size and importance.
- 3.2
- This overview of the area’s historic development will largely focus on the development of Higham Upshire, where the Site is located.
- 3.3
- Tithe mapping from 1848 illustrates the two distinct areas of Higham (Figures 3.1), notably localised around the Turnpike Road to the south, and the Thameand Medway Canal to the north. The built form is localised around a junction in Lower Higham, compared to more scattered development in the southern area of Higham Upshire.
- 3.4
- From 1862, the South Eastern Railway arrived in Lower Higham, positioned alongside the canal, while the southern area of Higham retained scattered development amongst a rural landscape. From 1895 (Figure 3.2), development in Higham Upshire increased slowly, with individual dwellings appearing along Villa Road, Forge Lane, and Telegraph Hill; connecting Hermitage Road to Gravesend Road (now the A226).



Figure 3.1 - Tithe Map of 1848 showing the two distinct areas of Higham and the Site

- 3.5
- From 1907, the land south of the railway continued to develop, and increased development expanded in the area between Hermitage Road and Gravesend Road (Figure 3.3). As well as individual dwellings interspersed throughout the southern area of Higham, from 1931, a number of rows of terraced housing appears on historic mapping (Figure 3.4). To the west, housing and roads were developed in Chilton Hills, as the village expanded to cater for a growing population.
- 3.6
- Higham Upshire continued to develop throughout the 20th century with more housing built along Gravesend Road and between Villa Road and Telegraph Hill. Between 1949-1960, further infill development was built out between Villa Road and Telegraph Hill in the Gashill area, adding to the expansion of Higham Upshire.
- 3.7
- From 1965, the expansion and continued development within Higham Upshire had continued, with a modern housing estate built out to the east of the Site (Figure 3.5). Today, Higham Upshire is a large village which has developed piecemeal through the 20th century along historic routes to Gravesend Road.

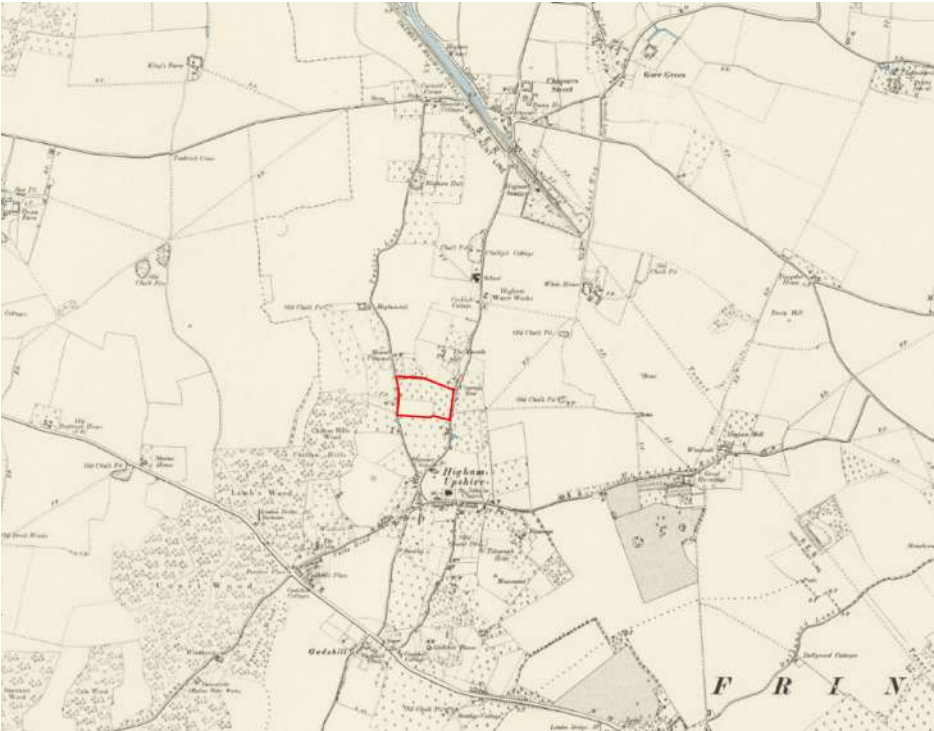


Figure 3.2 - Ordnance Survey Map of 1895

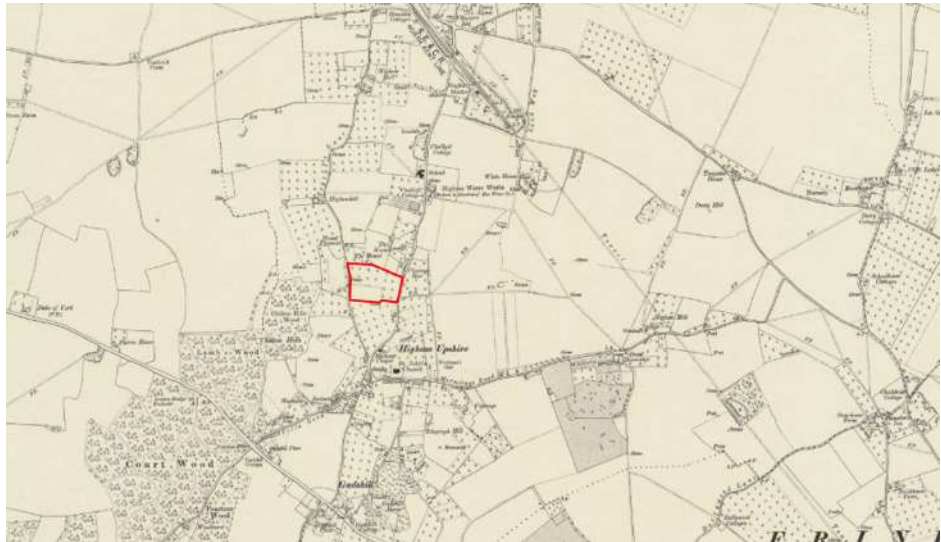


Figure 3.3 - Ordnance Survey Map of 1907



Figure 3.4 - Ordnance Survey Map of 1931



Figure 3.5 - Ordnance Survey Map of 1965

History of the Site

- 3.8
- The Site is a parcel of land within the northern end of Higham Upshire, positioned between School Lane and Taylors Lane. The Site was historically arable land which was later used for plantation or orchard, until reverting back to arable land towards the end of the 20th century.
- 3.9
- Tithe mapping from 1848 illustrates the Site was historically divided into a number of different landowners and occupiers, these plots are illustrated in Figure 3.6 and identified in Table 3.1.

Table 3.1: Tithe Apportionment (October 1841)

Plot	Landowner	Occupier
289	Thomas Bentley	William Easdown
290	Thomas Youens and William Skinner	Thomas Youens
291	Frederick Easdown	Frederick Easdown
292	John Drinkland	William Easdown
293	John Drinkland	William Easdown
294	John Cross	William Fuller
295	John Cross	William Fuller
296	James Sexton	William Easdown

- 3.10
- Towards the end of the 19th century, the boundaries within the Site had changed and reflected a part plantation or orchard, part arable parcel of land (Figure 3.7), and a footpath ran (and continues to run) through the middle of the Site. The Site continued to follow this form from 1907 through to 1938 (Figures 3.8). From 1947 the land which comprises the Site was totally plantation or orchard and this is also evident in historic mapping from 1965 (Figure 3.9).
- 3.11
- In 2020, the Site was included in the Gravesham Emerging Local Plan Partial Review as a proposed site allocation, the consultation opened on 23rd October 2020 and closed on the 31st December 2020.



Figure 3.6 - Tithe Mapping of 1848 on the site

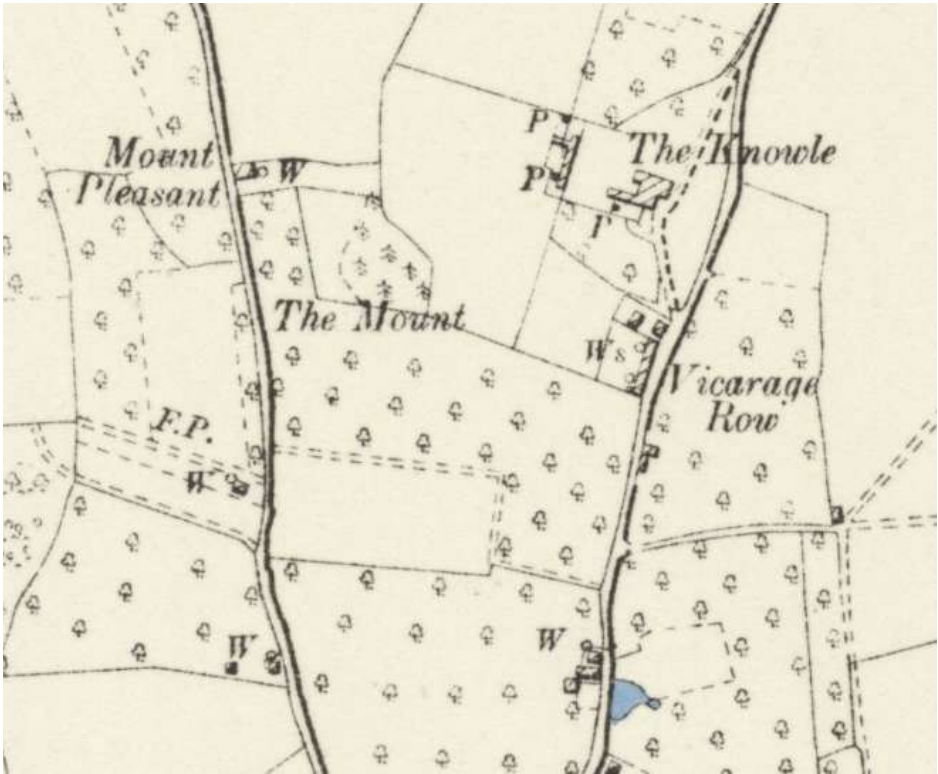


Figure 3.7 - OS Map of 1898

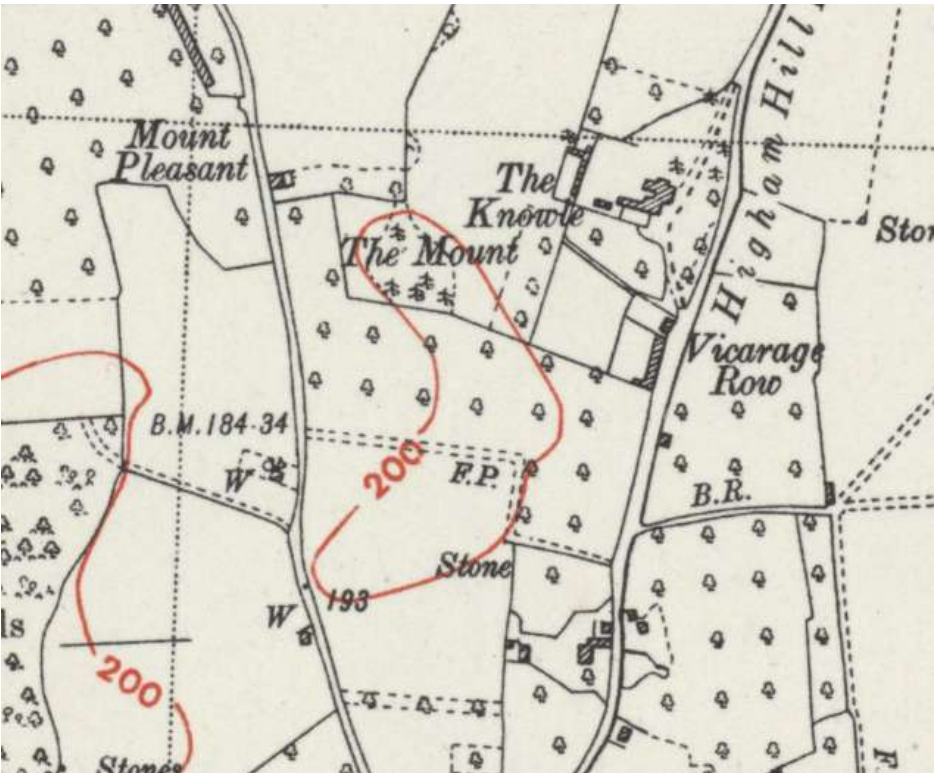


Figure 3.8 - Ordnance Survey Map of 1938

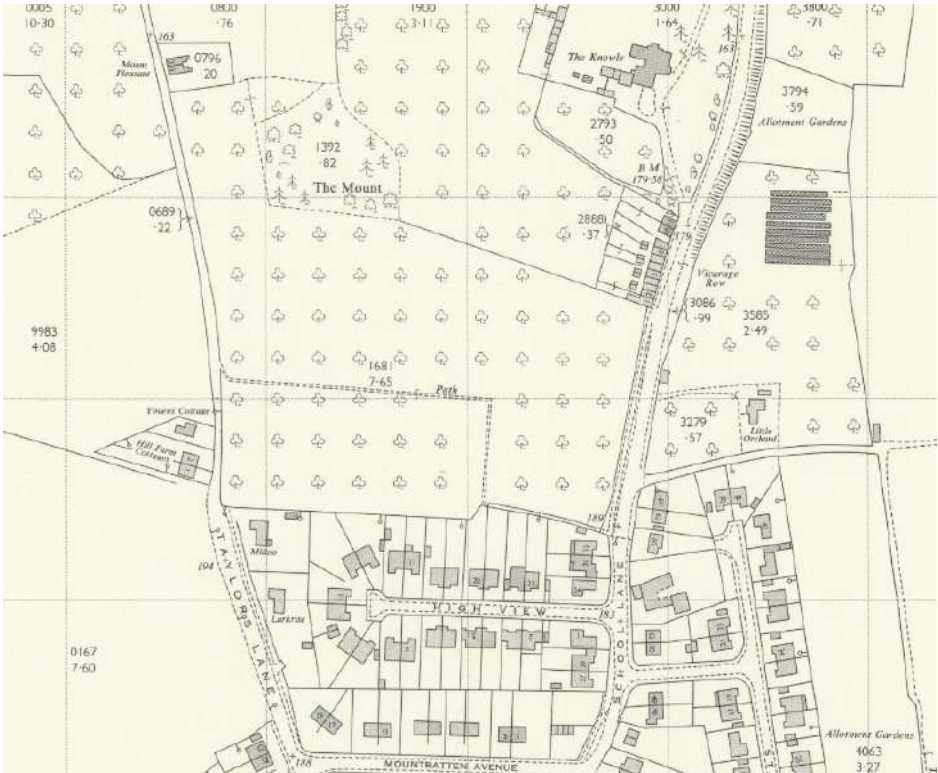


Figure 3.9 - Ordnance Survey Map of 1965

4. Significance

4.1 The significance of a heritage asset is defined within the glossary of the NPPF as:

‘The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’.¹

4.2 Listed buildings are statutorily designated and, for the purposes of the NPPF, are designated heritage assets. Recognising this statutory designation, buildings must hold special architectural or historic interest. The Department of Culture, Media and Sport publish the ‘Principles of Selection for Listed Buildings (2010)’ which is supported by thematic papers, ‘Listing Selection Guides’, based on building type, which give more detailed guidance.

4.3 The identification of a site as a non-designated heritage asset does not provide any legal protection of such asset, however, for the purposes of the NPPF, they are a material consideration in the determination of applications.

4.4 Historic England published a Good Practice Advice Notes on the ‘Setting of Heritage Assets’ (2nd Edition, 2017) which is used to understand the surroundings of a heritage asset which may contribute to the significance of a heritage asset. The contribution that setting makes to the significance of a heritage asset is ascribed a value of ‘limited’, ‘moderate’ or ‘high’ as determined by a detailed assessment and professional judgement.

4.5 The assessment considers to what degree the application site makes a contribution to the significance of the heritage asset. This is ascribed an attribute of ‘positive’, ‘neutral’ or ‘negative’ and is then given a value of ‘low’, ‘medium’ or ‘high’ and is also based on detailed baseline assessment and professional judgement.

Assessment

4.6 The following summary statements of significance provide an overview of the identified designated and non-designated heritage assets set out in Section 2, which may be affected by the application proposals. These are proportionate to the importance of the asset and the likely impacts of the proposals.



¹ NPPF (2024) Annex 2: Glossary (p.74)

Church of St John, Higham Upshire

4.7 The Church of St John, Higham Upshire (hereinafter referred to as the “Church”) was listed at Grade II on the 26th July 1983 for its special architectural and historic interest. It is located approximately 300m to the south of the Site, on Hermitage Road.

Architectural Interest

4.8 The Church is of architectural interest as a prominent and well-preserved example of Victorian ecclesiastical architecture in the Gothic Revival style. The building was designed by E W Stephens of London and built in 1862 of Rag and Bath stone with a slate roof (Figure 4.1).

4.9 The building features a tall, pointed spire which is a typical element of the Gothic style, acting as a focal point. The fenestration consists of lancet windows which evoke the early English Gothic style, and buttresses support and add visual rhythm to the external façade. The addition of a clock face on the towers makes it both a religious and civic landmark, common in village churches of the Victorian era.

Historic Interest

4.10 In the 19th century, the historic settlement of Higham moved to the south to a new settlement which grew along the new Rochester to Gravesend road. The historic village to the north had a Saxon origin parish church which served the local population. The distance between the two settlements and the growing population drove the need for a new church in Higham Upshire, leading to the construction of the Church of St John in the 1860s.

4.11 The historic interest of the Church therefore derives its significance as a Victorian ecclesiastical building built for the relocated and growing settlement of Higham Upshire, replacing the historic Saxon church from the old village.



Figure 4.1 - The Church of St John, Higham Upshire



Figure 4.2 - The Church of St John, 19th century

Setting

- 4.12 The immediate setting of the Church consists of the church yard, the stone boundary wall, and the modern church hall as illustrated in Figure 4.1. As well as providing key and historic appreciation of the church, the churchyard provides a quiet space of reflection away from the backdrop of a busy village. Due to the appreciation that can be gained of the church in its immediate setting, it makes a high contribution to the significance of the heritage asset.
- 4.13 The extended setting of the church comprises the surrounding settlement of Higham Upshire, whilst there are some contemporary historic buildings in the immediate vicinity appreciation of their relationship to the church has been diminished by extensive piecemeal modern development. The settlement of Higham Upshire reflects the growth of the village over the last 100 years which is now mostly dominated by modern buildings. The wider setting therefore makes a neutral contribution to the significance of the Church.
- 4.14 The Church is located on an elevated position in the centre of the village with the land falling away in particular to the north allowing for open views towards its northern elevation. The height of the spire means that there are happenstance views of the buildings across the village, securing its status as a landmark within the local landscape. The setting is considered to make a moderate contribution to the significance of the asset.

Contribution of Site to Significance

- 4.15 The Site consists of a parcel of arable land in the northern part of Higham Upshire, with increased modern development now infilling the area between the Church and the Site. The tall pointed spire, which is a typical element of the early English Gothic style, is prominent throughout the village and as a result can be seen when in the Site, looking south (Figure 4.3). It is the inherent nature of a tall church spire to be visible from the surrounding landscape and in the case of the views from the Site, these are considered to be incidental and do not comprise a planned or important view or vista. Views of the Church from the Site, from along the public right of way, are , already obscured by modern development in the foreground (Figure 4.3).
- 4.16 It is important to note that there is no appreciation of the Site from the Church grounds and therefore the appreciation of the two is only possible in views from within the Site. These views are incidental and do not comprise a planned vista, furthermore the view of the Church has altered over time in line with continuous development. It is therefore concluded that the Site makes a neutral contribution to the significance of the Church.

Summary of Significance

- 4.17 The Church of St John derives its significance from its historic and architectural interest as a good example of a Victorian ecclesiastical building built in the Gothic Revival style which was constructed to accommodate for the movement of the village of Higham to the south. Its significance is expressed through its architectural composition, materials, spire and landmark role within the historic settlement of Higham
- 4.18 Its setting contributes to its significance mostly through its immediate surrounding churchyard which provides intimate views of the building and a quiet space for reflection. Whilst there are views of the Church from the Site, these are considered to be incidental and make a neutral contribution to the buildings significance.



Figure 4.3 - View across the Site from the public right of way, looking south over Higham Upshire and the Church.

The Knowle

- 4.19 Desk-based research and on-site analysis has identified the Knowle as a non-designated heritage asset. It is noted on Higham Parish Council's website as a "Building of Note in Higham". It is located approximately 120m to the north of the Site on School Lane.

Architectural Interest

- 4.20 The architectural interest of the building derives from it being a good example of Victorian Gothic Revival architecture (Figures 4.13 and 4.14).
- 4.21 The building has steeply pitched roofs with prominent gable ends, and tall protruding chimneys which add vertical rhythm to the faux medieval silhouette. The building's irregular and organic layout is a key feature of Gothic Revival, and emphasises a picturesque quality over symmetry. The irregularity also adds to the sense of scale and depth, giving it a romantic, storybook quality.

Historic Interest

- 4.22 The historic interest of the Knowle derives from its age and status as a large house built around 1840 for Rev. Joseph Hindle. Whilst Hindle was the local Reverend, there is no evidence to suggest that the house was the official rectory for the parish however it is likely it operated as one. It is likely the Reverend serves both churches Higham and Higham Upshire hence its location between the two churches. The house was utilised from 1940 for Second World War civil defence headquarters and would have been decommissioned in 1945. From 1980, under the ownership of Michael and Lynn Baragwanath, the Knowle was converted to a wedding/events venue and restaurant.



Figure 4.13 - The Knowle (source - Knowle Country House)



Figure 4.14 - Northern elevation of the Knowle (source - Knowle Country House)

Setting

- 4.23 The immediate setting of the building is its plot and grounds, which are well maintained for its use as a wedding venue, a purpose it has served for the last 50 years. The immediate setting, despite modern additions, allows the building to be appreciated as it most likely was when it was built, within a formal, countryside plot, with a large drive. The building and gardens are enclosed by dense mature boundary vegetation which largely prevents any views into the complex from the outside, it is presumed this is an intentional move to retain the privacy of the wedding/hotel venue. Due to the immediate setting being largely retained, it makes a high contribution to the significance of the Knowle.
- 4.24 The extended setting of the Knowle consists of the surrounding landscape to the north, east, and south which is bordered by mature hedgerow. Beyond this, to the north, east, and west, the landscape consists of agricultural land with farmsteads and individual dwellings scattered throughout the area between Higham Upshire and Lower Higham. To the south of the Knowle is Higham Upshire, which has increased in size and built form over the last 100 years, most notably being the development of Highwoods Close, High View, and St John's Road which are currently the most northerly housing estates in the northern part of Higham Upshire. As the former house of the Reverend the Knowle has a connection to both the Church of St Mary to the north and the Church of St John to the South, however these relationships are not appreciated visually due to the distance and topography.
- 4.25 The landscape has been altered by the encroaching modern development of Higham Upshire and as there is little visual appreciation of the surrounding landscape due to the dense boundary screening the wider setting makes a limited contribution to the asset's significance.

Contribution of Site to Significance

- 4.26 The Site comprises a parcel of land which sits to the south of the Knowle in its wider setting. There is no evidence that there is any direct historic or ownership relation between the Site and the Knowle. The topography of the immediate landscape means that the Site sits on a noticeably higher area of land to the Knowle almost sitting above the asset. As shown in Figure 4.15, there are some views of the Knowle though a break in the boundary vegetation when looking north from certain areas of the Site. Due to the higher topography these views almost look down onto the asset, glimpsing the roofscape.
- 4.27 The Site does form part of the surviving open landscape around the Knowle which is a remnant from its historic setting. Due to boundary treatments and the topography, it is unlikely that there are any views of this open setting from within the Knowle's grounds, although there would be an appreciation of an 'open' landscape due to the lack of any built form.

For this reason, the Site makes a positive but low contribution to the significance of the Knowle.

Summary of Significance

- 4.28 The Knowle derives its significance from its historic and architectural interest as a good example of a mid-19th century large country house/rectory built in the Victorian Gothic Revival style. Its setting makes a contribution to its significance largely through its surrounding landscaped grounds and wider connection to the settlements of Higham and Higham Upshire and their parish churches. The Site makes a positive but low contribution to its significance as part of the surrounding agricultural landscape.



Figure 4.15 - View looking north from within the Site towards the Knowle

5. Assessment of Proposals

- 5.1 The heritage legal and planning policy relevant to the consideration of the application proposals set out in Appendix A of this report. This legal and policy context includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2024), as well as regional and local policy for the historic environment.
- 5.2 In accordance with paragraph 207 of the NPPF, the significance of the designated and non-designated heritage assets that may be affected by the application proposals have been set out in Section 4 of this report.
- 5.3 The NPPF requires local planning authorities to identify and assess significance of a heritage asset that may be affected by the proposals (paragraph 208). They should take the assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposals.
- 5.4 Account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability, and the desirability of the new development making a positive contribution to local character and distinctiveness (paragraph 210).
- 5.5 When considering the impact of proposals on the significance of designated heritage assets, the NPPF requires (paragraph 212) that great weight should be given to their conservation and the more important the asset, the greater the weight should be. This is consistent with recent high court judgements (Barnwell Manor, Forge Fields) where great weight should be attached to the statutory duty.
- 5.6 Where a development proposal causes harm to the significance of designated heritage assets, this should either be treated as less than substantial (paragraph 215), or substantial (paragraph 214). In determining the level of harm, the relative significance of the element affected should be taken into account. Furthermore, local planning authorities are also encouraged to look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance. According to paragraph 219, proposals that preserve those elements of setting the make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.
- 5.7 Paragraph 216 of the NPPF concerns the effect of an application on the significance of a non-designated heritage asset and should be taken into account when considering development proposals with a balanced judgement being required to have regard to the scale of any harm or loss against the significance of the asset.

The Proposals

- 5.8 The application proposals comprise:

‘Outline planning application for the redevelopment of up to 50 residential dwellings (including affordable housing), vehicular access road from School Lane, internal roads, car parking, landscaping, public open space, and other associated works and infrastructure. All matters to be reserved with the exception of the main site access’

Impact of Application Proposals

The Proposed Design

- 5.9 An outline indicative masterplan has been prepared for the residential development, shown in Figure 5.1. This This sets out clear developable areas, access routes and open spaces to guide detailed layouts at the reserved matters stage.
- 5.10 The layout of the outline development has taken into account the varying topography of the Site, ensuring that consideration is given to storey heights and building orientation on the brow of the hill. Higher density development has been focused in the southwestern and southeastern corners of the development, where the topography drops and visibility of the Site decreases, with bungalows and two storey houses situated along the eastern, western and central southern edges.
- 5.11 The unit mix includes 2, 3 and 4 bedroom homes as well as a small bedroom apartment block along School Lane. To ensure the development fits within the context and takes account of the surrounding topography, the maximum height of the buildings across the Site is two storey, including the apartment block.
- 5.12 The application is to be submitted in outline, however consideration has been made for the appearance of the residential houses. A contextual analysis has been undertaken of the surrounding streets which show a mixture of architecture and materials. As such, a predominant vernacular approach is intended for the design.
- 5.13 Smith Jenkins provided heritage advice during the design development stage, informed by a baseline assessment and site walkover, ensuring that mitigation was embedded into the design where necessary. Mitigation for potential heritage impacts has been embedded within the outline proposals and secured through submitted parameter plans. This includes the restriction of built development away from the northern boundary adjoining the Knowle, the retention of landscape buffers and open space, the control of access arrangements and movement / viewing corridors. Further detailed mitigation, including boundary treatments, landscaping

and building heights, would be secured at the reserved matters stage and would be required to accord with the parameters assessed in this statement.

Figure 5.1 - Masterplan



Church of St John, Higham Upshire

- 5.14 The Church of St John is Grade II listed, it derives its significance from its historic and architectural interest as a prominent church completed in 1862 in the Gothic Revival style. The Church is located 300m to the south of the Site in the centre of the residential settlement of Higham and there is no appreciation of the Site from the immediate setting of the Church or its grounds. The Church, most notably its spire, is appreciable from the Site and along the PROW which runs through the centre, this is due to the Site being on a higher area of land with long views to the south over the settlement.
- 5.15 It is considered that the Site makes a neutral to limited contribution to the significance of the Church. Although there are views of the asset from the PROW these are considered to be incidental and do not comprise a planned or important view or vista. Additionally, views of the Church from the Site are already obscured by modern development in the foreground associated with the 20th century development of Higham.
- 5.16 Despite this, the view was highlighted at the early design stage to ensure that views of the Church, and wider settlement, were retained along the existing route of the PROW within the new development. A green corridor has been created along the existing PROW through the development which will enable the view to still be appreciated, maintaining the appreciation of the Church and vista of the settlement. Furthermore, the design has ensured that less dense, two storey houses are situated along the view to prevent distraction from the vista.
- 5.17 Within the parameters submitted at outline stage, including the defined development envelope, landscape buffers and retained public right of way, the proposals would preserve the significance of the Church of St John. Any future reserved matters scheme would be required to accord with these parameters, ensuring that the assessed level of impact could not be exceeded.

The Knowle

- 5.18 The Knowle is a non-designated heritage asset, affording it a level of protection proportionate to its significance, in accordance with paragraph 216 of the NPPF. It derives its significance from its historic and architectural interest as a good example of a mid-19th century country house/rectory in the Gothic Revival style. Its setting contributes to its significance largely through its surrounding landscaped grounds and wider connection to the settlements of Higham and Higham Upshire and their parish churches.
- 5.19 The Site makes a low, positive contribution to the significance of the asset as a remnant of the wider open setting, however due to the difference in topography and boundary treatments there is unlikely to be any views of

the Site from within the Knowle's grounds. The proximity and sensitivity of the Knowle was highlighted at the early design stage, to ensure that the design could mitigate any potential harm. The outline layout has ensured that development has been pushed away from the northern boundary with the gardens of the Knowle, creating a buffer and ensuring no proposed built form is visible from within the grounds. A Local Equipped Area of Play has been intended for this area, also pushed away from the boundary to avoid any increased visual or audio activity. Additional planting is also proposed along the boundary to improve screening and maintain privacy for the Knowle.

- 5.20 It is therefore concluded that the proposed development would preserve the significance of the Knowle. The combination of mitigation measures, including the separation distance between the Knowle boundary and built form, retained topography, boundary treatment and new planting ensures that the asset's historic setting its ability to be appreciated would remain unchanged.

Considerations against Legislation and Policy

Statutory Duties

- 5.21 The Planning (Listed Buildings and Conservation Areas) Act 1990 places duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the character and appearance of conservation areas.
- 5.22 This statement has identified the significance of the designated and non-designated heritage assets which could be affected by the application proposals and concludes that the proposals would preserve their significance.

NPPF (2024)

- 5.23 The significance of the heritage assets (both designated and non-designated), as required by paragraph 207 of the NPPF, has been set out in Section 3 of this report.
- 5.24 The conservation of heritage assets has, in line with paragraph 212 of the NPPF, been given great weight and mitigation has been integrated into the design from an early stage. In accordance with paragraph 212 of the NPPF, the application proposals will preserve the significance of the Grade II listed Church of St John and The Knowle NDHA. The application proposals are therefore in accordance with the NPPF.

Local Policy

- 5.25 This report has concluded that the proposals would preserve the significance of the identified designated and non-designated heritage assets and are therefore in accordance with Policy CS20 of the Gravesham Local Plan (September 2014).

6. Conclusion

- 6.1 This Heritage Statement has been prepared to assess the impact of proposed outline development for a residential scheme of 50 houses and associated access at the Land West of School Lane, Higham.
- 6.2 In accordance with paragraph 207 of the NPPF, the significance of the designated and non-designated heritage assets which have the potential to be affected by the application proposals have been described in this statement. A clear understanding and appreciation of the significance of the heritage assets has informed the evolution of the proposals, and mitigation has been embedded into the design.
- 6.3 This Heritage Statement has concluded that, when assessed on a parameter-based worst-case scenario appropriate to an outline application, the application proposals preserve the significance of the Grade II listed Church of St John and The Knowle NDHA.
- 6.4 The application proposals are in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2024) and relevant regional and local policy and guidance, including the Gravesham Local Plan Core Strategy (September 2014)

Appendix A: Planning Policy and Guidance

Legislation

Planning (Listed Building and Conservation Areas) Act 1990

Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

According to Section 69 of the Act a Conservation Area is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

Section 69 further states that it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. Adding, the Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area, is an area of special architectural or historic interest; the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character and appearance of Conservation Areas. Further provisions are detailed in Section 74 of the Act.

Recent case law¹ has confirmed that Parliament’s intention in enacting Section 66 (1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means “to do no harm”. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits

as required by national planning policy. This can also logically be applied to the statutory tests in respect of conservation areas. Similarly, it has also been proven that weight must also be given to heritage benefits.

National Planning Policy

National Planning Policy Framework (NPPF) December 2024

The National Planning Policy Framework (NPPF) was published on the 12th of December 2024 and sets out the Government’s planning policies for England and how these are expected to be applied. It has purposefully been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the ‘golden thread’ which is expected to run through the plan-making and decision-taking activities. It should be noted, however, that this is expected to apply except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets , as set out in paragraph 11 of the NPPF. Within section 12 of the NPPF, ‘Achieving well-designed places’, Paragraphs 131 to 141, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.

Section 16, ‘Conserving and enhancing the historic environment’, Paragraphs 202 to 221, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which LPAs need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance .

The NPPF advises LPAs to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment. These considerations should be taken into account when determining planning applications:

- The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness;

- Opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 204 of the NPPF states that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

In order to determine applications for development, Paragraph 207 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to Paragraph 208, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraph 202 adds that 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.

Paragraphs 212 to 221 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 212 emphasises that when a new development is proposed, great weight should be given to the asset’s conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

Paragraph 215 advises that where a development will cause 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 securing its optimum viable use.

Paragraph 216 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Adding, that in weighing applications that affect directly or indirectly 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.

Paragraph 217 stipulates that LPAs should not permit 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.

In addition, Paragraph 219 notes that LPAs should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated

¹ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) Historic England (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

favourably.

Paragraph 220 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, the loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under Paragraph 214 or less than substantial harm under Paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The NPPF therefore continues the philosophy of that upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. English Heritage (now Historic England) defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.' (Constructive Conservation in Practice, English Heritage, 2009).

National Guidance

Planning Practice Guidance (NPPG) 2019

Planning Practice Guidance (PPG) was introduced by the Government as a web-based resource on 6th March 2014 and is updated regularly, with the most recent update on 23rd July 2019. The PPG is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Adding, it is the degree of harm, rather than the scale of development that is to be assessed. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset.

Finally, the PPG provides in depth guidance on the importance of World Heritage Sites, why they are importance and the contribution setting makes to their Outstanding Universal Value. The PPG also provides guidance on the approaches that should be taken to assess the impact of development on the Outstanding Universal Value of World Heritage Sites.

Historic England Guidance - Overview

On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (December 2017).

The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

In addition to these documents, Historic England has published several core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; 'HEAN1: Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)', 'HEAN2: Making Changes to Heritage Assets' (25th February 2016) and 'HEAN3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015). In addition to these 'HEAN4: Tall Buildings' (December 2015), 'HEA:#N7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021), 'HEAN10: Listed Buildings and Curtilage' (21st February 2018) and, 'HEAN12: Statements of Heritage Significance' (October 2019). Collectively, these Advice Notes provide further information and guidance in respect of managing the historic environment and development within it.

Historic England Good Practice Advice Note 1 (GPA1): The Historic Environment in Local Plans (March 2015)

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to 'inform the nature of allocations so development responds and reflects local character'.

Further information is given relating to cumulative impact, 106 agreements, stating 'to support the delivery of the Plan's heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.' It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

Historic England Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that 'development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.'

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;

2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

Historic England Good Practice Advice Note (GPA3): The Setting of Heritage Assets (December 2017)

This is used to understand the surroundings of a heritage asset which may contribute to its significance. It aids practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG, once again advocating a stepped approach to assessment.

It amalgamates ‘Seeing the History in the View’ (2011) and ‘Setting of Heritage Assets’ (2015) forming one succinct document which focuses on the management of change within the setting of heritage assets.

The guidance is largely a continuation of the philosophy and approach of the previous documents, albeit now with a greater emphasis on the contribution that views to and from heritage assets make to their significance. It reaffirms that setting should be understood as the way in which an asset is experienced.

The guidance emphasises that setting is not a heritage asset, nor a heritage

designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise, vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset’s surroundings.

This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It identifies that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, as well as further weighing up the potential public benefits associated with the proposals. It clarifies that changes within the setting of a heritage asset may have positive or neutral effects.

It highlights that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using a ‘5-step process’ in order to assess the potential impact of a proposed development on the setting and significance of a heritage asset, with this 5-step process similar to that utilised in earlier guidance:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England Advice Note 3 (HEAN3): The Historic Environment and Site Allocations in Local Plans (October 2015)

This document provides information for those involved in the site allocation process, particularly when implementing historic environment legislation, relevant policy within the NPPF and related guidance found within the Planning Practice Guidance (PPG).

The inclusion of sites within a Local Plan can provide the opportunity to ensure that new development will avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting. Furthermore, this document highlights the ways in which the process of site allocation may present opportunities to better reveal the historic environment. It sets out a five-step methodology which can assist in appropriate site selection:

Step 1: Identify which heritage assets are affected by the potential site allocation;

Step 2: Understand what contribution the site (in its current form) makes to the significance of heritage asset(s);

Step 3: Identify what impacts the allocation might have on that significance;

Step 4: Consider maximising enhancements and avoiding harm; and

Step 5: Determine whether the proposed site allocation is appropriate in light of the NPPF’s tests of soundness.

Historic England Advice Note 7 (HEAN7): Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021)

First published by English Heritage in 2012 under the title ‘Good Practice Guide for Local Heritage Listing’, HEA7: Local Heritage Listing: Identifying and Conserving Local Heritage supersedes the first edition of the published guidance; Historic England Advice Note 7: Local Heritage Listing (2016), reflecting the changes made to the Planning Practice Guidance in 2019.

The updated advice seeks to support communities and local authorities in the introduction of a local heritage list in their area or for those wishing to make changes to an existing list which may have already been adopted. It observes the value of a local heritage list and seeks to adopt a consistent and accountable approach to the identification and management of heritage assets at a local level.

Historic England notes that inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets, no matter how they are identified, to the benefits of good planning for the area and of owners, developers and others wishing to understand local context fully. By providing clear and up-to-date information, backed by policy set out in the NPPF (2019), a local heritage list which has been available on the website of a local planning authority and via the Historic Environment Record (HER) provides clarity on the location and identification of non-designated heritage assets.

Regarding the identification of non-designated heritage assets, Historic England builds on the guidance set out in Planning Practice Guidance (2019) in defining a non-designated heritage asset, highlighting that they can be identified in several ways, including:

- Local Heritage Lists;

- Local and Neighbourhood Plans;
- Conservation Area Appraisals and Reviews;
- Decision-making on planning applications.

Whilst the advice notes that planning protections for non-designated heritage assets are not as strong as those for designated heritage assets, it highlights that they are still important, referring to the importance of paragraph 197 of the NPPF (2019), which requires local planning authorities to take into account the desirability of sustaining and enhancing the significance of such heritage assets.

This document draws on good practice across the country in developing a new local heritage list or making improvements to an existing one. Importantly, this advice should be seen as a starting point. In order to remain flexible enough to respond to local needs, decisions on the ways in which assets are identified, and the system adopted for managing the local heritage list, are matters for local planning authorities and their communities. This advice does, however, set out methods for setting up and managing a local list to provide ideas on how this might be done, including providing a clear criterion setting commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list.

Historic England Advice Note 12 (HEA12): Statements of Heritage Significance (October 2019)

HEA12: Statements of Heritage Significance covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

The document states that understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Strategic Policy

Local Policy

Gravesham Local Pan Core Strategy (Adopted September 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.



Studio 11.2.1
The Leather Market
11 13 Weston Street,
London
SE1 3ER

7 Canon Harnett Court
Wolverton Mill
Milton Keynes
MK12 5NF

www.smithjenkins.co.uk

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