



PLANNING & HERITAGE STATEMENT

IN SUPPORT OF A FULL PLANNING APPLICATION

2 MILTON ROAD, GRAVESEND
KENT, DA12 2RE

Prepared by	Design Extension Ltd
Date	September 2026
Application type	Full Planning Application

1.0 Introduction

1. This Planning & Heritage Statement has been prepared by Design Extension Ltd on behalf of the applicant in support of a full planning application for the installation of a commercial kitchen extraction and ventilation system serving the ground floor unit at 2 Milton Road, Gravesend, Kent, DA12 2RE.
2. The ground floor unit falls within Use Class E(b) (sale of food and drink for consumption mostly on the premises). The proposed works comprise the installation of an internal extraction canopy above the cooking line, associated ductwork rising through the building, an extraction fan and attenuation equipment located within the existing roof space, and an external discharge terminal (jet cowl and cravette) positioned at the rear of the building.
3. No.1 Milton Road (The New Inn), adjoining the site to the west, is a Grade II Listed Building, whilst nos.2-5 Milton Road, which formed part of the same original development, are recognised by the Local Planning Authority as non-designated heritage assets of local interest. The application site is also located within the King Street Conservation Area. As the proposal affects heritage assets, this Statement identifies their significance, considers the effect of the proposed works upon that significance, and assesses the proposal against the statutory tests in the Planning (Listed Buildings and Conservation Areas) Act 1990 and against relevant planning policy.
4. This Statement should be read alongside the submitted drawings (Location Plan, Block Plan, Existing and Proposed Floor Plans, Existing and Proposed Elevations) and the kitchen ventilation system specification prepared by Univent Bespoke Solutions, which together form this application.

2.0 Site Location and Context

5. 2 Milton Road is a two-storey-plus-attic mid-terrace building forming part of a row of properties (nos.1-5) understood to derive from the same early development on the north side of Milton Road, within the historic commercial core of Gravesend.
6. The ground floor is in commercial use, accessed via a shopfront to Milton Road, with residential accommodation above under a separate, recently approved conversion. To the rear is a two-storey addition and roof void, within which the proposed extraction plant is to be housed.
7. The adjoining property to the west, no.1 Milton Road, is the former New Inn public house, a Grade II Listed Building, which had been in use as a vape shop since c.2016 with two residential flats to the first and second floor. Although forming part of the same original development, nos.2-5 Milton Road are not listed but are recognised as being of local interest, and are treated as non-designated heritage assets. The site lies within the King Street Conservation Area.
8. In May 2022, a fire started in no.1, spreading through the roof into nos.2 and 3. The former pub was totally destroyed along with the roof and much of the first floor of no.2, and part of no.3. The properties have continued to be in their fire-damaged condition, with barriers enclosing nos.1 and 2. The recently approved conversion scheme referred to in Section 3.0 above addresses the repair and reinstatement of no.2 following this fire damage.
9. Opposite the site, on the south side of Milton Road, are further designated heritage assets, including the Grade II Listed Roman Catholic Church of St John the Evangelist and nos.157-158 Milton Road.

3.0 Planning History

10. The building has recently benefited from planning permission for a full-width ground floor rear extension, conversion of the first and second (loft) floors to form a two-bedroom self-contained flat, and the erection of front and rear dormer windows, together with reinstatement of historic shopfront and fenestration detailing

to the principal elevation. That scheme has been implemented/is being implemented and is unaffected by the current proposal.

11. The current application does not seek to alter that approved scheme. It relates solely to the installation of kitchen extraction plant and ductwork serving the retained ground floor commercial unit.

4.0 Identified Heritage Assets

No.1 Milton Road / The New Inn

12. No.1 Milton Road (The New Inn) is a Grade II Listed Building (List Entry Number 1341483, first listed 3 July 1975). The listing describes an C18 corner building of 2 storeys with a tiled roof, coved eaves cornice, sash windows, and a C19 bar front; nos.1–5 are noted to form a group, with nos.2–5 identified as being of local interest.
13. Following the fire of May 2022, no.1 Milton Road was totally destroyed and remains in a ruinous condition, enclosed by barriers. Notwithstanding its ruinous state, the building retains its statutory listing and designated heritage asset status.

Nos.2–5 Milton Road

14. Nos.2–5 Milton Road, including the application site, are non-designated heritage assets, recognised by the Local Planning Authority as being of local interest and cited within the listing description of no.1 on that basis.

King Street Conservation Area

15. The application site lies within the King Street Conservation Area, which encompasses much of the 18th and 19th century commercial expansion of Gravesend along the historic stagecoach route formed by New Road, King Street, and Milton Road. The area is characterised by continuous rows of commercial buildings with shopfronts and accommodation above, interspersed with civic and religious buildings, including the Grade II Listed St John's Church.

Other Listed Buildings

16. St John's Catholic Church and nos.157–158 Milton Road, opposite the site, are Grade II Listed Buildings. Given the nature and rear siting of the proposed works and the absence of any change to the principal elevation of no.2, it is concluded that there will be no harm to the setting or special interest of these buildings, and they are not assessed further within this Statement.

5.0 Planning Legislation and Policy

17. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering an application for development affecting a listed building or its setting, special regard is had to the desirability of preserving the building, its setting, or any features of special architectural or historic interest which it possesses.
18. Section 72(1) of the same Act requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.
19. The NPPF requires (paragraph 200 and associated policy in Section 16) that the significance of any heritage asset affected by a proposal, including the contribution of its setting, be described, and that great weight be given to the asset's conservation when considering impact (paragraph 205). Paragraphs 207–208 require that any harm, including less than substantial harm, be weighed against the public benefits of the proposal.

20. Section 15 of the NPPF requires that planning decisions ensure a good standard of amenity for existing and future users of land and buildings, including appropriate mitigation of noise and odour impacts from commercial uses.
21. At the local level, relevant policies include Gravesham Local Plan Core Strategy (2014) Policy CS20 (Heritage and the Historic Environment) and saved Policies TC2 and TC3 of the Gravesham Local Plan First Review (1994), together with any adopted policies relating to amenity and the control of noise and odour from commercial food and drink uses.

6.0 Assessing Significance

22. The significance of no.1 Milton Road (The New Inn) derives from its age, architectural interest as a Grade II Listed corner building, and its historic and communal value associated with its long use as a public house within the town. As a designated heritage asset, it is considered to be of high significance. However, following its destruction by fire in May 2022, no historic or significant fabric now remains above ground; its significance today rests principally in its statutory designation, its historic form as recorded in its listing description, and its group value with nos.2-5.
23. The significance of nos.2-5 Milton Road, including the application site, derives from their shared origin with no.1 as part of the same historic development, and their contribution to the group value and streetscape of Milton Road. As non-designated heritage assets, they are considered to be of low-medium significance. No.2 itself sustained fire damage to its first floor and roof in the same incident, further limiting the extent of historic fabric surviving at the application site.
24. The significance of the King Street Conservation Area derives from its retained historic street pattern and the concentration of listed and locally listed buildings that create a strong sense of place associated with Gravesend's 18th and 19th century commercial development, including the roofscape formed by the terrace of which no.2 forms part.

7.0 Proposed Development

25. Full planning permission is sought for the installation of a commercial kitchen extraction and ventilation system, comprising:
 - An overhead stainless steel (grade 304, brushed finish) extraction canopy measuring 3000mm wide x 1200mm deep (600mm back, 300mm front), incorporating baffle-type grease filters, fitted internally above the cooking line at ground floor;
 - A stainless steel splashback fitted beneath the canopy;
 - Galvanised steel ductwork (manufactured and installed to DW144/DW172 specification) rising internally through the building, comprising a 500mm square section duct with 90° bend, transitioning to a 450mm diameter spiral duct within the roof space;
 - An insulated extraction fan (Flaktwoods PowerBox3 model PB500140, 44dBA sound level at 3m, speed-controllable) mounted within the existing roof void on anti-vibration mounts;
 - A duct-mounted silencer/attenuator fitted downstream of the extraction fan to provide noise attenuation;
 - An odour control filtration unit incorporating carbon bag filters and mesh pre-filters;
 - An external discharge terminal comprising a 700mm cravette and 700x450mm jet cowl, rising above the rear roof slope, discharging at a minimum of 1m above eaves level with an efflux velocity of 10-14m/s to ensure effective dispersal.
26. No enlargement of the building's footprint or floorspace is proposed. The principal (Milton Road) shopfront and front elevation, including the historic fenestration reinstated under the recently approved scheme, are

entirely unaffected. The extraction ductwork, fan, and discharge terminal are positioned at the rear of the building, rising through the rear roof slope.

8.0 Assessment

Design and Visual Impact

27. The extraction equipment is sited internally at ground floor and within the existing roof void, with the ductwork and discharge terminal (cravette and jet cowl) rising through the rear roof slope. Given the height of this equipment relative to the ridge line, and the mid-terrace form of the building, elements of the ductwork and discharge terminal will be visible in wider views of the roofscape from Milton Road and the surrounding streetscene, rather than being wholly concealed from public view.
28. This visibility is, however, considered to be limited in extent and effect. The equipment is confined to the rear roof slope, away from the principal Milton Road elevation, shopfront, and front roof slope, all of which remain wholly unaltered. The ductwork and discharge terminal comprise standard galvanised steel and stainless steel components of a scale and character consistent with modern kitchen extraction plant commonly found on commercial premises within historic town centres, including elsewhere within the wider Gravesend conservation area. The equipment is functional in nature, of modest bulk relative to the building and the terrace as a whole, and does not involve any alteration to historic fabric.
29. On balance, while the proposal will result in a limited degree of visibility of the extraction equipment within the wider streetscene, this is considered to give rise, at most, to a low level of less than substantial harm to the character and appearance of the King Street Conservation Area, which is significantly and convincingly outweighed by the public benefit of enabling the continued operation of an active commercial use within the conservation area, consistent with its historic function as a commercial thoroughfare.

Heritage Impact — Listed Buildings

30. No.1 Milton Road (The New Inn) adjoins the site to the west. The proposed extraction equipment is sited to the rear of no.2 and does not project towards, or attach to, no.1 or its curtilage. Given the separation from the listed building's principal elevation and the retention of the historic party wall and roofline relationship between the two properties, together with the fact that no.1 has been destroyed by fire and no longer retains historic fabric capable of being affected, it is concluded that the proposal would preserve the setting and special interest of no.1 Milton Road, in accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
31. The significance of nos.2–5 Milton Road as non-designated heritage assets derives principally from the shared historic form and the group value of the terrace as seen from Milton Road. As the principal elevation and front roofline are unaffected, and the extraction equipment is confined to the rear roof slope, it is considered that the significance of the host building and the wider group is not materially harmed.

Residential Amenity — Noise and Odour

32. The proposed system has been designed by a specialist ventilation engineer to DW144/DW172 industry specification. Noise is controlled through the use of an insulated extraction fan (rated at 44dBA at 3 metres) and a dedicated silencer fitted downstream of the fan, providing substantial attenuation of breakout and discharge noise. Odour is controlled through a dedicated two-stage filtration unit comprising particulate and carbon filters, in addition to the baffle-type grease filters within the canopy itself. The discharge terminal is designed to achieve an efflux velocity of 10–14m/s, ensuring effective dispersal of exhaust air well above eaves level. On this basis, the proposal is considered capable of operating without unacceptable impact on the amenity of neighbouring occupiers.

Precedent

33. This approach is consistent with a recently approved planning permission at this address, which similarly involved works to the rear and roof of the building (a full-width ground floor rear extension, conversion of the upper floors, and rear/front dormer windows) whilst preserving the principal elevation and the special interest of the adjoining listed building and conservation area. That approval demonstrates that the Local Planning Authority has accepted the principle of rear and roof-level intervention to this building as compatible with its heritage significance and setting, provided the principal elevation and historic fabric visible from the street frontage are unaffected — the approach taken in the present proposal.

Other Matters

34. The proposal does not affect car parking, servicing, or highway access arrangements, and does not result in any increase in the floorspace or seating capacity of the commercial unit.

9.0 Conclusion

35. The proposed installation of a commercial kitchen extraction and ventilation system represents necessary plant to support the continued lawful operation of an established ground floor commercial unit. The equipment has been carefully designed to minimise noise and odour impacts on neighbouring occupiers, and is sited to the rear of the building so as to avoid any alteration to the principal Milton Road elevation.
36. It is acknowledged that, owing to its height and the mid-terrace form of the building, elements of the ductwork and discharge terminal will be visible within the wider streetscene. This limited visual effect is considered to amount, at most, to a low level of less than substantial harm to the character and appearance of the King Street Conservation Area, which is clearly and convincingly outweighed by the public benefit of retaining a viable, active commercial use at ground floor level. No harm is identified to the setting or special interest of the adjoining Grade II Listed Building (no.1 Milton Road) or to the significance of the locally listed host building.
37. The proposal is considered to accord with the National Planning Policy Framework, with sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and with the relevant policies of the Gravesham Local Plan. It is respectfully requested that planning permission be granted.