



# Land adjacent to 35 Clarence Place, Gravesend, Kent DA12 1LB

HERITAGE IMPACT ASSESSMENT

JANICE GOOCH

## Heritage Statement

Land adjacent to 35 Clarence Place, Gravesend, Kent DA12 1LB

|                  |                            |
|------------------|----------------------------|
| Client Reference | Heritage impact assessment |
|------------------|----------------------------|

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## 1. Summary

This is a Heritage Statement, comprising of an understanding of significance and an impact assessment for the proposed scheme to form a new building on land adjacent to 35 Clarence Place, Gravesend, Kent DA12 1LB.

The property is not listed but is within the Woodmill Hill Conservation Area. The site is within the wider setting of Grade II listed Gravesend War Memorial and Tivoli House and therefore this statement will look at the setting of the designated heritage assets.

This Heritage Statement has been written with the proposed scheme by Target C.

Based on the assessment, the proposed development will not have any detrimental impacts on the setting of the listed building or the character of the conservation area.

### 1.1. Aims and results

The aim of this statement is to recognise the significance and character of the heritage assets and to assess whether the works would affect the significance, character or setting of the heritage assets.

### 1.2. Purpose of Report

This report has been drafted to allow for planning purposes.

### 1.3. Nature of Proposal

The proposed scheme looks to undertake:

*'Erection of a 3-storey building comprising of 3No. flats.'*

### 1.4. Commission

The report was commissioned by the developer.

## 2. Methodology

### 2.1. Introduction

The primary purpose of the numerous policies and guidance's are to preserve significance and protect the historic environment. Understanding the significance of the asset (refer to Section 3.10) allows for informed decision to be made on the impact of a proposed scheme on the significance of the asset, allowing for managed changed and development to occur, whilst protecting the historic environment.

### 2.2. National Planning Policy Framework

This heritage statement looks to comply with the National Planning Policy Framework (2024) section 16, to provide:

- An understanding/describe the significance of the heritage asset,
- An understanding/contribution to the setting of heritage assets,
- An assessment of the impact of the proposed works on the heritage asset,
- An assessment of the impact of the proposed works on the setting of the heritage assets.

The National Planning Policy Framework (NPPF 2024), paragraph 207, which states:

*'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...'*

This statement has been undertaken with the consideration of the level and extent of the proposed works and is not to be considered as a full historical report or conservation plan.

The format, techniques, terminology, and content within this assessment is based upon Historic England's 'Conservation Principles, Policies and Guidance. This document sets out a comprehensive framework for the sustainable management of the historic environment, within which the term conservation is a process defined as managing change through the understanding of the significance of the place, fabric, and setting, while recognising opportunities to reveal or reinforce those values for present and future generations.

In addition, it follows the guidance of

- Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12. (Historic England 2019),
- Principles of Cultural Heritage Impact Assessment in the UK (IEMA 2021),
- Planning Practice Guidance on Conserving and Enhancing the Historic Environment (2014),
- Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England, 2008),
- Historic Environment Good Practice Advice in Planning Note 3: The setting of Heritage Assets (2<sup>nd</sup> Ed., Historic England 2017).

This report will not comment on the local planning policies.

### 2.3. Information Sources Consulted

This Heritage Statement has been prepared using a variety of resources to provide an understanding of the site and the wider setting. Sources include:

- Local Authority website,
- National Heritage List for England (NHLE) via Historic England – Search the List,
- Heritage Gateway,
- Information, historic maps, and photographs (online),
- Google Searches.

## 3. The Site

The site lies to the south of the historic town. Clarence Place runs east to west, linking Windmill Street to Parrack Street, two main roads leading into the town centre from the south. Clarence Place is formed of a mix of residential dwellings, formed of mix pairs of villas and terraces. The north side is more developed, with the Congregational Church forming a main focal point. The south side of the street is more dispersed development and now forms an area for the War Memorial (GII) and the Veteran's Club.

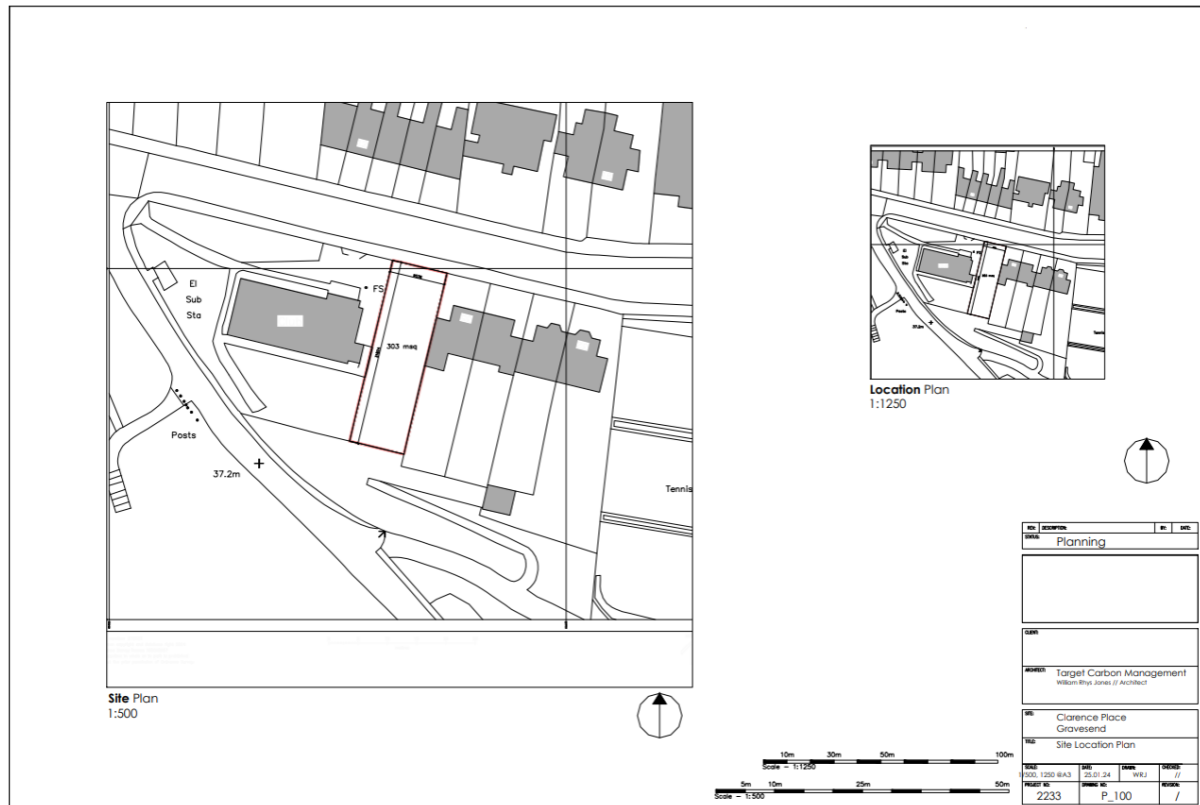


Figure 1 – site plan.

### 3.1. Site Description

The is currently open land that sits between the Veterans Club, a single storey building set on higher ground within its own plot and 35 Clarence Place, a semi-detached tree-storey dwelling.

### 3.2. Designation of the Site

The site is within the Woodmill Hill Conservation Area.

### 3.3. Development of Site

#### 3.3.1. Historic Maps

The earliest OS map (1866) shows the two pair of houses and to the west, a laid-out garden which formed part of the grounds for the Windsor Castle Public House. Further west is a pair of villas referred to as Clarence House. Their long gardens go to Windmill Street, with a small access lane to the rear of their gardens leading to the Windsor Castle Public House. The pubs grounds include additional built form that runs along the Walled Garden wall.

To the east of the houses, it appears that the street is laid out to receive a small crescent of houses, and further east is Homestead Villa set in its own grounds and garden. Smaller terraces are formed further north towards the main town, with larger semi-detached houses facing onto Windmill Street.



Figure 2 - 1866 OS Map

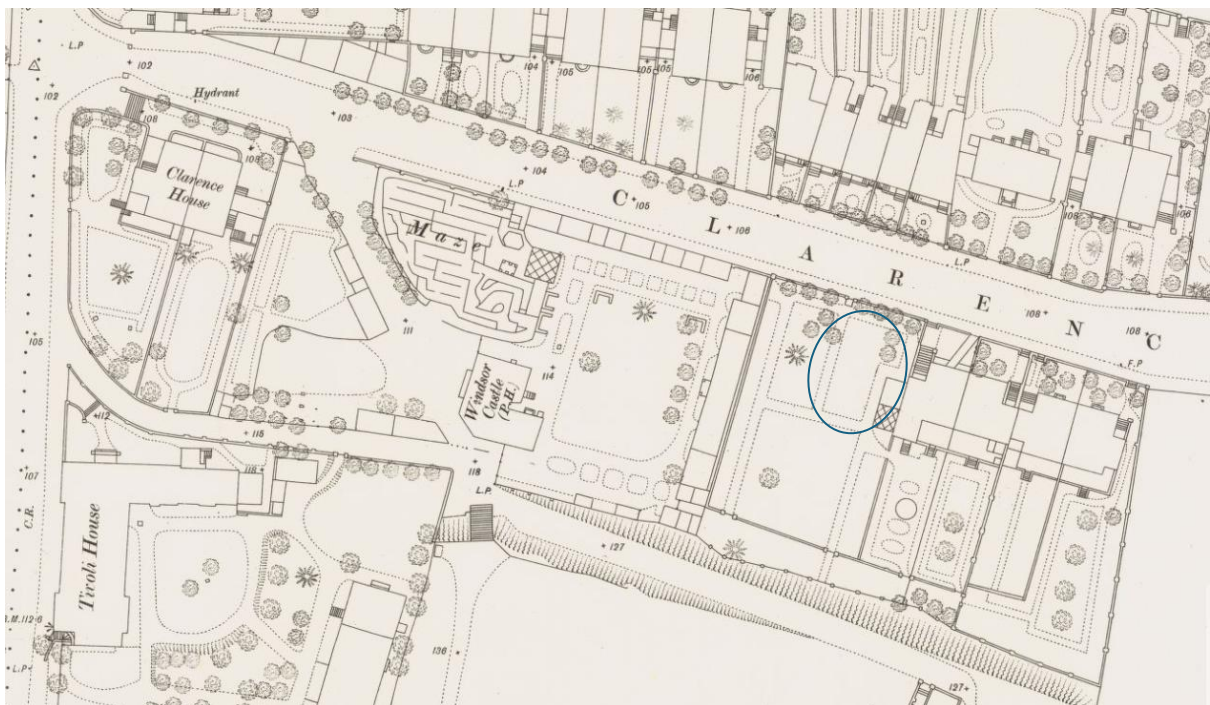


Figure 3 - 1866 OS Map, in detail, with the proposed site location highlighted

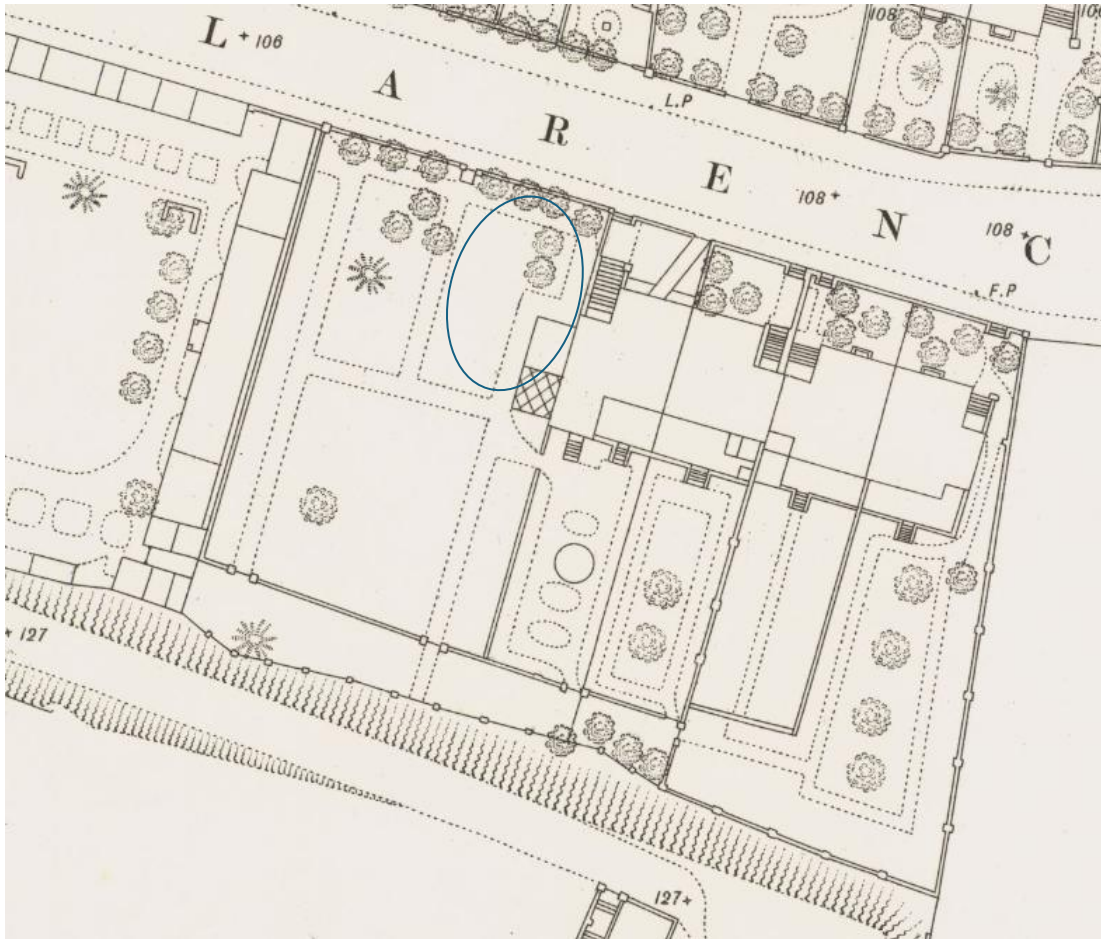


Figure 4 - 1866 OS Map, in detail, showing proposed site with building and small glass house, as a formal garden, with access to No.35



Figure 5 - 1907 OS Map

By 1907, Clarence House and the public house are gone, and the proposed Site has been changed with a group of glass houses. The site of the Veteran's Club is wooded, and the remaining ground to the south becomes a recreation ground. The formal garden to the north side of Clarence Place has been lost to allow for the construction of the Congregation Church. The 1915-16 OS map shows the same structures within the walled garden.



Figure 6 - 1915-16 OS Map – showing structures on the proposed Site.

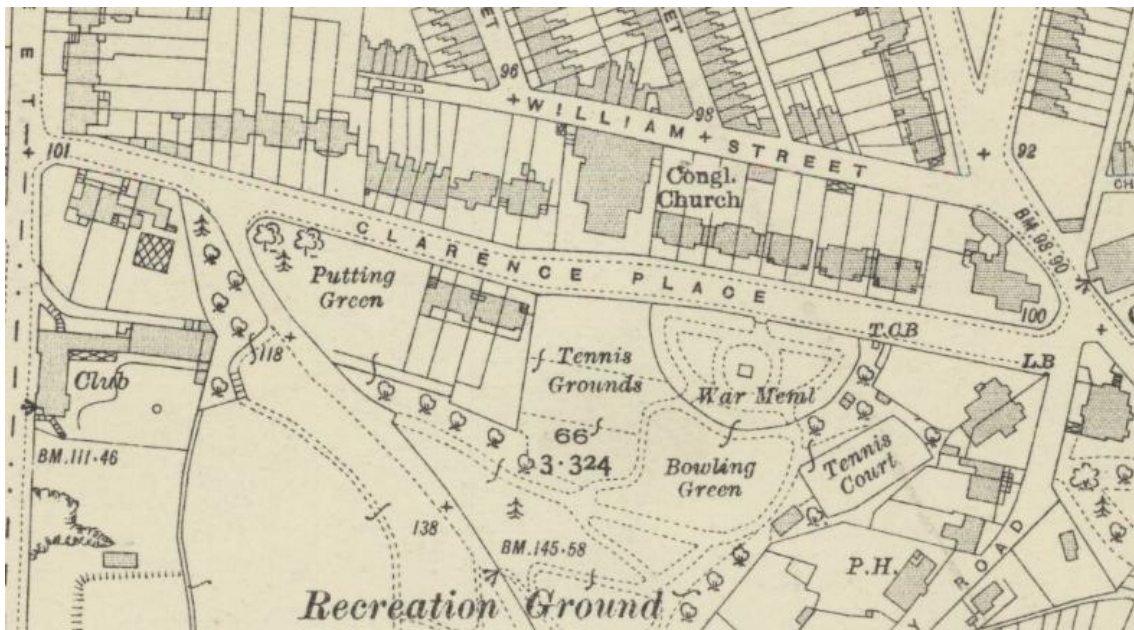


Figure 7 - 1932 OS Map



Figure 8 - 1938 OS Map

Development continued, and by the end of the 1930's there were a row of terraces (Tivoli Terrace) along Windmill Street. Tennis courts & grounds, Bowling Green and the War Memorial (GII) had been formed. The proposed Site is now part of the Recreation Ground and identified as 'Putting Green' on the 1932 OS Map. Tirol House is converted into a Club (and later Hall), but was originally an hotel and refreshment rooms, built in 1836, with later extensions in 1856 and late 1800's. Some of the other public green spaces are developed in the wider area.

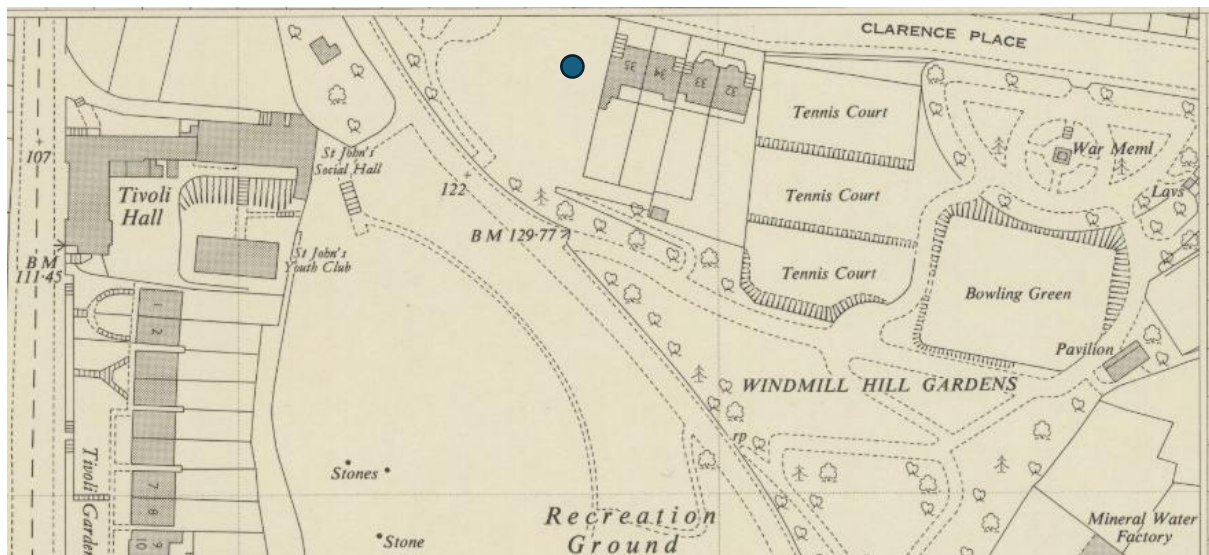


Figure 9 - 1953 OS Map

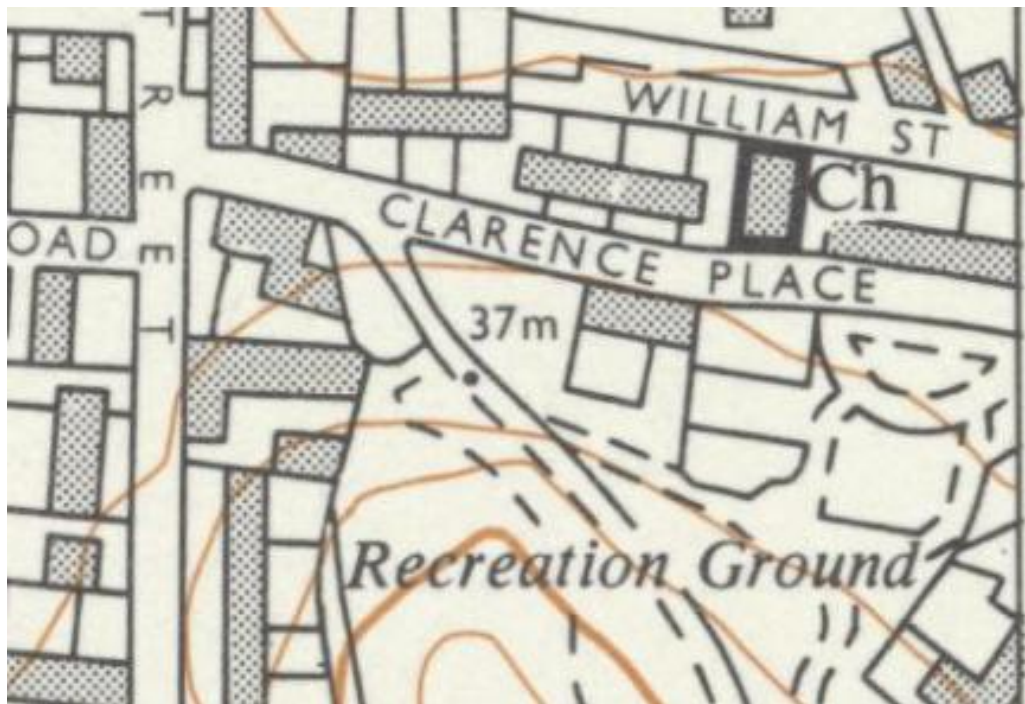


Figure 10 - 1973 OS Map

The car park for the Veterans Club was laid out in c.1993, but the club does not appear in any of the historic OS maps up to the early 1970's. Additional building of a row of five terraced houses, with carparking has been undertaken to the north-east corner of Clarence House, replacing an early 1900s building and glass house.

### 3.3.2. Historic Photographs

A Google search resulted in no results for the site.

Historic England's 'Red Boxes' contained no pictures of the site.

### 3.4. Former Uses

The earliest OS map shows the proposed site as a private Walled Garden, with a connection to No.35. Over time, the site became a wooded area and a putting green as part of the Recreation Ground to the south.

### 3.5. Site Analysis

A site visit was not undertaken as part of the report.

### 3.6. Additional Information

Gravesend Port was an important riverside port as it was the first main stop down the River Thames from London. A fire in 1727 destroyed much of the historic core of the town centre, and within hundred years the population had increased. Between 1821 to 1841, the population had doubled from 6,583 to over 13,000. The 1830s saw the development of a new town hall, new piers, new churches and a planned development to join Gravesend to Milton. This was not only for residential occupancy, but to attract holidaymakers, many of whom would use Windmill Hill as this would link the river with the new hotels and villas, and pleasure gardens to the south.

It was part of this New Town development on the Milton Park estate of the 1830s that includes Clarence Place. Designed by Amon Henry Wils of Brighton<sup>1</sup> in 1830. Much of this plan was realised, including Peacock Street, Edwin Street (1840), Harmer Street (1836) and Berkely Crescent, but a second crescent on the south side of King Street was not developed. Parrock Street cuts through the 1830s plan, and heading south, past Clarence Place is Constitution Hill, which is described by Pevsner as ‘proud yet forlorn, intended as an imposing classical statement on the skyline yet pathetically incomplete’.

As shown in the OS plans, Clarence Place forms the end of the development of the 1830s scheme, though it appears that this was not fully completed as intended. The buildings here were designed to face up the hill towards the Windmill that was demolished in 1894.

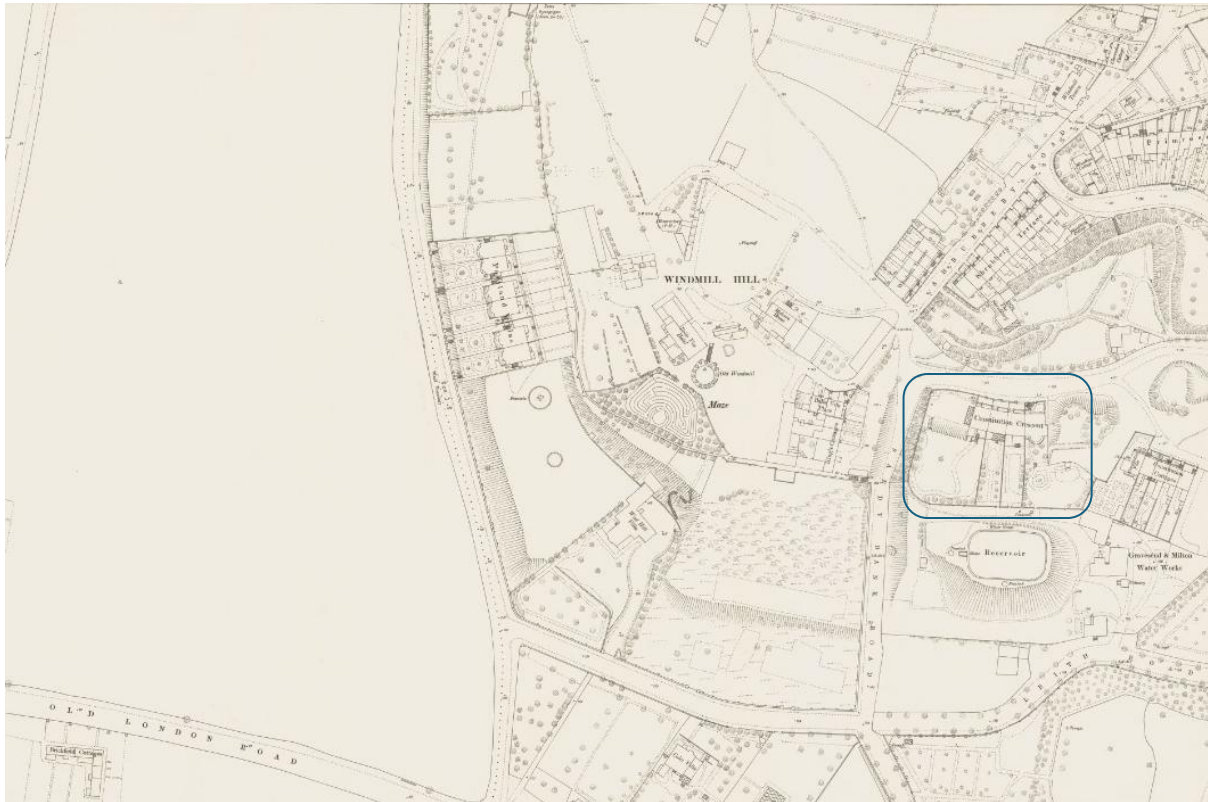


Figure 11 – 1860s OS plan showing incomplete but laid out 1830s scheme. Constitutional Hill is highlighted.

### 3.7. Identification of other Heritage Assets

Within the wider setting there are several listed buildings (all Grade II):

- Gravesend War Memorial
- Homemead
- 1 Parrock Road
- Gate Piers to No 1
- K6 Telephone Kiosk
- 29 Clarence Place
- Tivoli House
- 109 & 110 Windmill Street

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<sup>1</sup> Amon Henry Wils of Brighton one of a group of three Architects who was responsible for the mass construction of Brighton during this period.

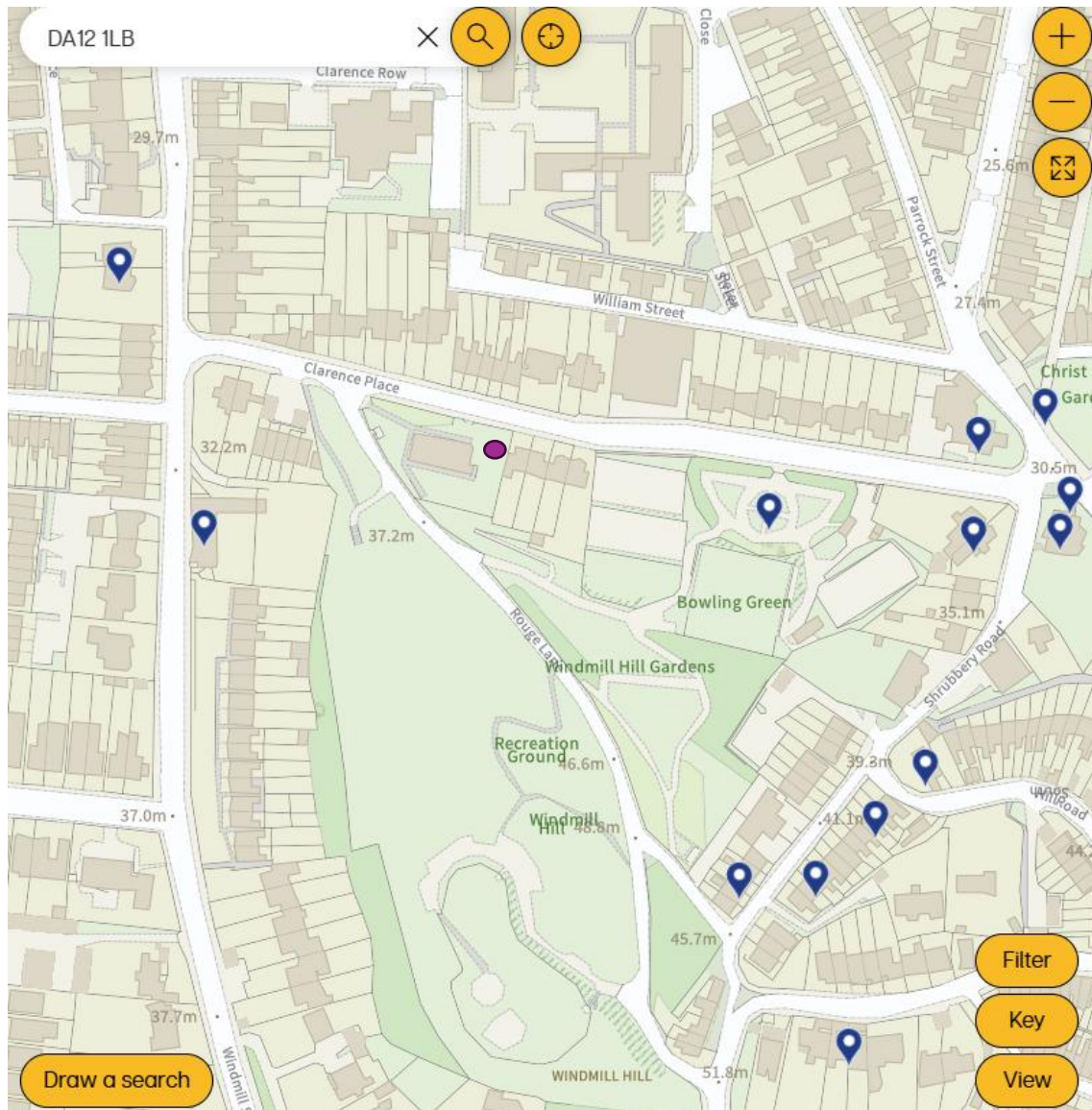


Figure 12 - designated heritage assets, shown as blue triangles (listed buildings). Taken from [Map Search | Search the List: Map Search | Historic England](#)

Due to the width of the road, other built form and the established trees within the area, there is no visual connection between the listed buildings and the site.

The site forms part of the Woodmill Hill Conservation Area.

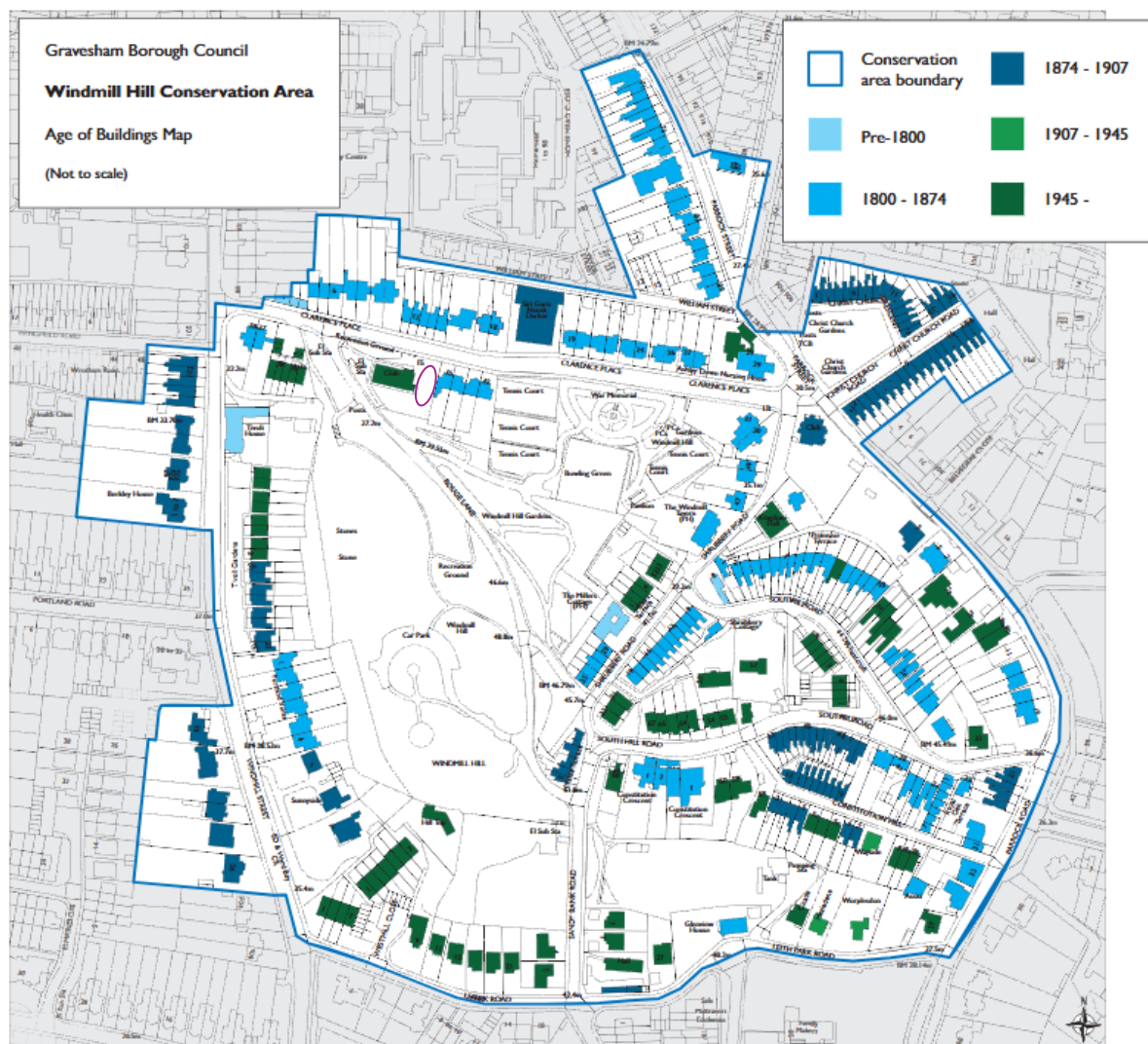


Figure 13 - Map of Conservation Area, taken from the Conservation Area Appraisal - [gravesham.gov.uk/downloads/file/1013/windmill-hill-appraisal](https://gravesham.gov.uk/downloads/file/1013/windmill-hill-appraisal)

### 3.8. Setting of the Asset

The NPPF states that the setting as:

*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be natural.*

The site has is on the south side of Clarence Place and is currently screened by trees.

Most of the listed buildings contribute to the character of the conservation area, and their setting by the architectural form as they were constructed to the 1830s formal scheme. This includes Tivoli House, which whilst it is shown above to date pre-1800, is dated 1836. The War Memorial sits within its own formal landscape, which appears from the early OS map to have been laid to form another crescent.

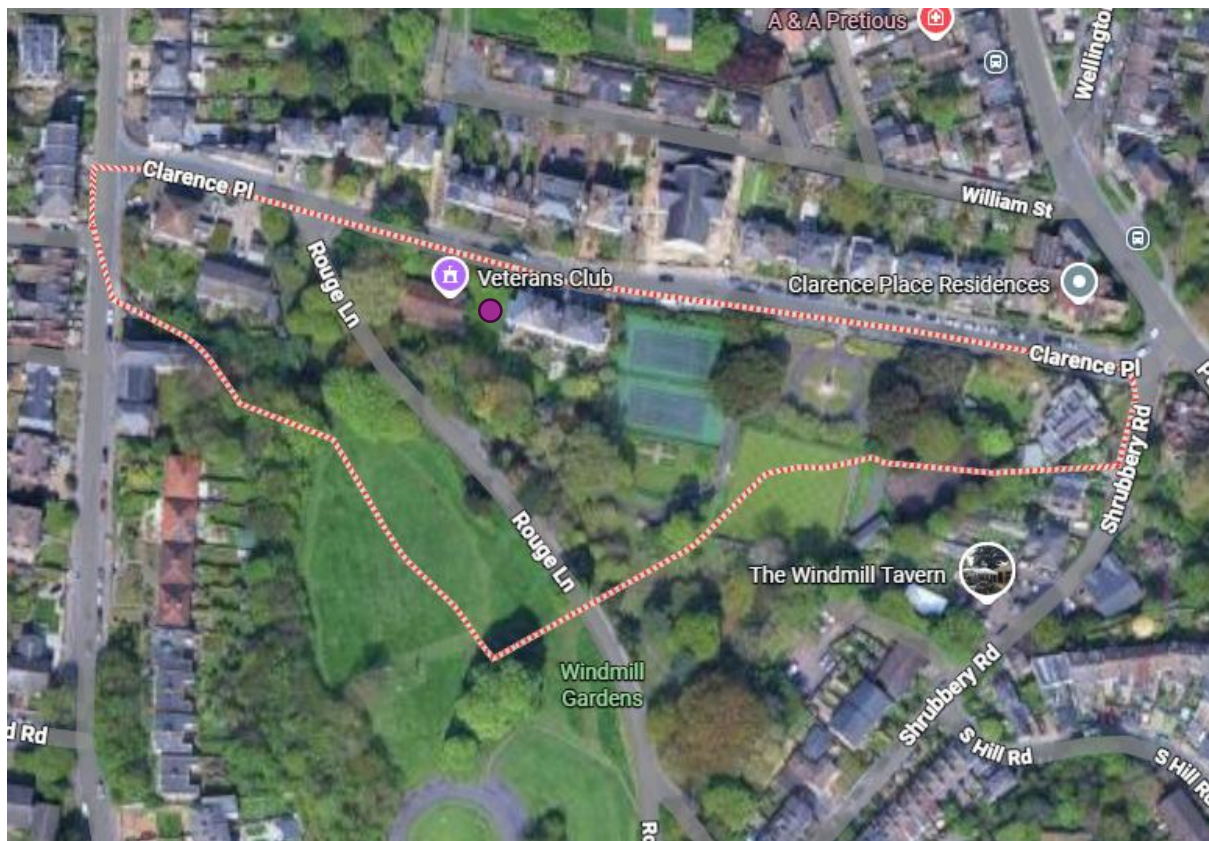


Figure 14 - Google Earth map showing the setting of the site. Taken from [DA12 1LB - Google Maps](#)

The Conservation Area Appraisal (2007) gives a summary of the character as:

*The character of the Conservation Area is of a residential suburb, containing a large number of buildings of architectural and historic interest. The buildings are relatively unaltered and generally in a good state of repair. The topography has shaped the street pattern, with narrow lanes meandering up the steep slopes of the hill, and buildings arranged to take full effect of attractive views, both of Windmill Hill, and across the countryside of Kent. The two typical forms of buildings a repaired villas and terraces, many of which are set back from the pavement line behind front gardens. These front gardens, together with other large private gardens contribute to the spacious and green character of the street scene. Windmill Hill Gardens and Windmill Hill itself are significant green spaces within the town, and cater to various leisure and recreational uses.*

Clarence Place, Windmill Hill Gardens and Parrock Street form Character Zone 1. The Appraisal recognises that this part of the town was developed due to the rapid growth in the 19<sup>th</sup> century, and continues to note:

*Clarence Place is residential in character, with paired villas and stucco terraces grouped to form a continuous plot development on the northside of the street. The residential development on the south side of Clarence Place is more fragmentary and varied, with the greater density of buildings concentrated at the western end. With the exception of Nos. 1-4, which were formerly shops, all of the buildings in Clarence Place are set back from the pavement line, by varying degrees, behind front gardens and this contributes with the wide road to create a spacious appearance.*

The Appraisal states that ‘One of the last buildings to be erected on Clarence Place, the Milton Congregational Church and lecture hall (now flats), of 1873’, but provides no comments on the Veterans Club. The Church was built on a formal public garden, one of several designed into the 1830s scheme.

It is the eastern end of Clarence Place where the openness and greenery are noted, with ‘attractive view eastwards across to Christ Church Gardens and the surrounding terraced houses (Character Area 6). The public realm is attractively landscaped on Parrock Street; the wide pavements contain low flowerbeds with decorative timber edging.’ This little area is formed of a group of listed buildings, no. 29 Clarence Place (Ashley Down Nursing Home); nos. 30-31 Clarence Place and no. 1 Parrock Road. Due to the length of the road, and its bend, there is no visual connection with this group.

The conservation area, and particularly this part of Clarence Place, has a strong architectural design from the development in one key period, with only minor changes occurring, such as the former Congregational Church (1873), the Veteran’s Club and the group of five terrace houses to the south-east of Clarence House, and their associated car parking.

The Veteran’s Club is a single-storey building that sits within its own plot and is partially screened by trees. Like the terrace houses opposite, it is built in brick, but with metal windows. The design is simple, with a gable facing the road as the main means of entry. The brick boundary wall progresses just past the pedestrian entrance, and the remaining boundary to the recreational ground entrance is plant growth over a wire fence.

The group of five terraced houses are significantly set back from the street scene, with the large carparking space and garages in front. The design of these is late 20<sup>th</sup> century, with white horizontal weatherboarding between the ground and the long first floor windows. Due to the established trees along Rogues Lane, they are generally screened.

This small part of Clarence Place has altered since the original development and the creation of the recreational ground. Which whilst it now gives the impression of a formal garden, possibly for a large house, was formed from a mix of plots, as shown in the 1863 OS map.

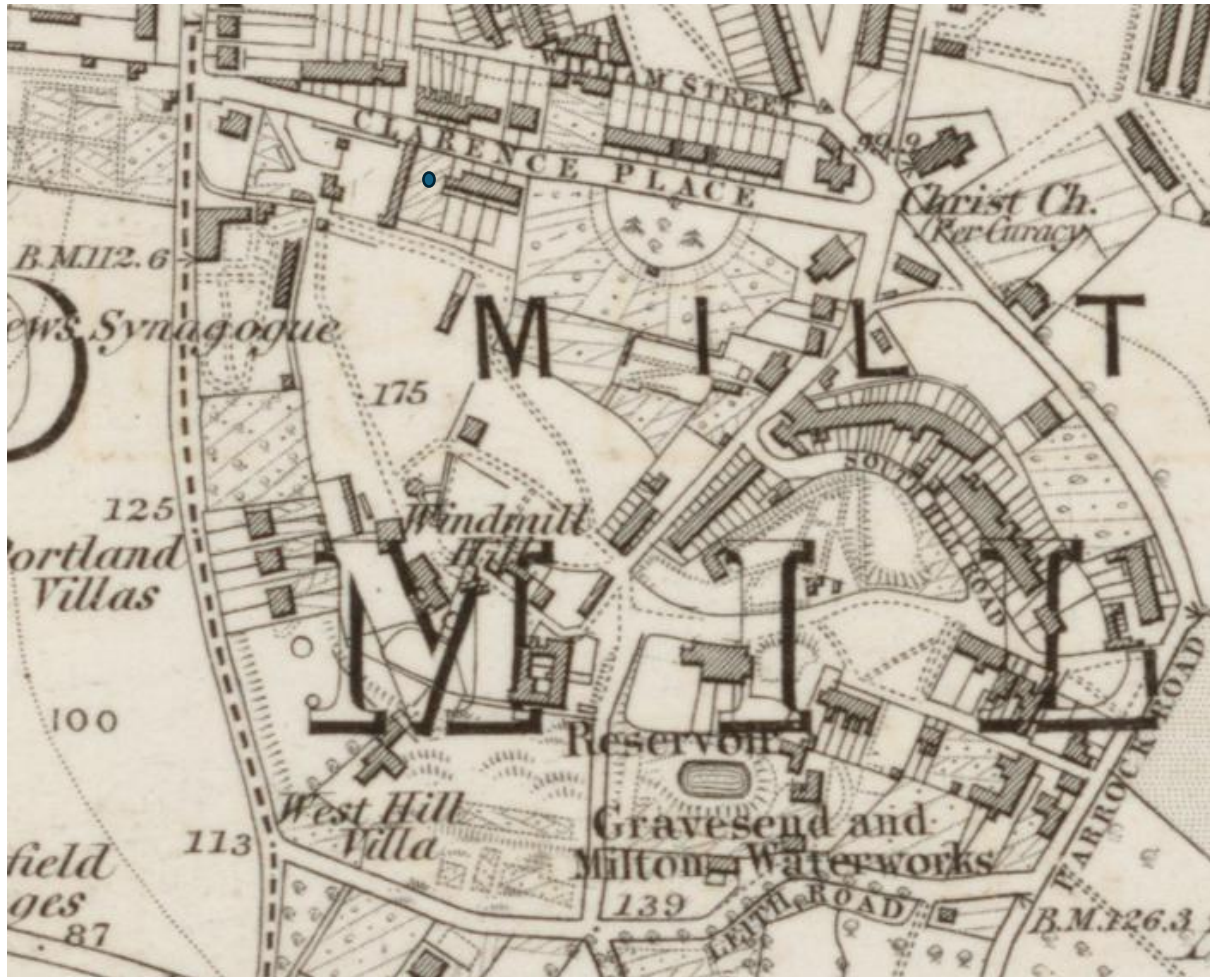


Figure 15 - 1863 OS Map

### 3.9. Criteria for assessing Significance

The criteria used for assessing significance is based upon the Historic England guidance – Conservation Principles: Policy and Guidance and their renewed Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

Significance has been categorised into three main headings:

- *Archaeological interest*: the potential of a place to yield evidence about past human activity
- *Architectural or artistic interest*: the ways in which people draw sensory and intellectual stimulation from a place
- *Historic interest*: the meaning of a place for the people who relate to it, or for whom it figures in their collective memory or experience.

The NPPF (2024) confirms that significance is:

*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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.*

Each of these values is rated low; medium or high significance to provide an overall understanding of the building or place.

### 3.10. Assessment of Significance

The significance of the site is contribution to the character of the area.

#### Archaeological Interest

The Historic Environment Record (HERs) provides information for the listed buildings only, and not for any archaeological works within the area.

The site formed part of the Milton Park Estate and was developed under the 1830s scheme as a private walled garden for 35 Clarence Place. There may be some archaeological evidence of the previous garden and the lost glass houses that are shown on the historic OS maps.

#### Architectural and Aesthetic Interest

The site in recent years has been wooded and forms part of the wider entrance to the Recreational Grounds and the Veteran's Club. When the 1830s scheme was initially developed, it offered a very different street scene with a brick wall of the Walled Garden, with no entrances.

The site contributes to the character of the conservation area by the established trees and plant growth that sit at the front of the plot, which partially screen the grass, shrubs, flat roof rear extension of No.35 and rear brick boundary wall of the villas.

The architectural and aesthetic interest is of medium significance as part of the character of the conservation area for this character area of the conservation area.

#### Historic Interest

The area was developed as part of a mass extension plan designed by one of the architects responsible for Brighton. The scheme was never fully realised, and it appears that the north side and some of the south of the Clarence Place was the last section to be full realised. The site appears to have been formed as a private garde for No.35, but over the last century has changed to be part of the Recreational Grounds, and then sub-divided to form the Veteran's Club in the mid-late 20<sup>th</sup> century.

The historical interest of the area is of medium-high significance; however, the site has low significance.

## 2. Planning History

As the site is undeveloped, there is a limited planning history.

- [Erection of a 4 storey building comprising of 4no flats.](#)

Ref. No: 20241133 | Status: Application Refused



Figure 16 – Proposed front and rear elevation (20241133)

This application was dismissed and dismissed at Appeal. The Case Officer concluded that:

*The proposed development fails to preserve or enhance the special interest of the Windmill Hill Conservation Area by virtue of developing an established, landscaped open space and detracts from historic local key unlisted buildings through poor design that disrupts cohesive qualities within the street scene.*

This scheme did create a design that made the building more dominant in the street scene due to the increase in ridge height, partly as this would not be set into the ground to create a half-basement, and the modern floor-ceiling heights.

## 2.1. Pre-application

A previous pre-application submission was undertaken 24 April 2024.

## 3. Proposed Scheme

### 3.1. Requirements for Works

The proposed scheme looks to create additional dwellings on the site.

### 3.2. Design Considerations

Within a conservation area it is important that any proposed new builds respect the scale, mass, form and rhythm of the buildings or structures. The design could be a contemporary design, using the existing architecture as a starting point.

However, the conservation area, and particularly this part of Clarence Place has a strong architectural design from the development in one key period, with minor changes occurring, with the former Congregational Church (1873), the Veteran's Club and the group of five terrace

houses to the south-east of Clarence House, and their associated car parking, as discussed earlier.

### 3.3. Mitigation and Enhancement

Where possible the NPPF encourages enhancement of heritage assets. However, this does not mean preventing any development to be undertaken, but where it is undertaken, it should be done with care, respect and understanding of the significance of the heritage assets.

### 3.4. Appeal Decision

A previous scheme had been submitted and refused at Appeal. The Inspector noted the architecture of the street, the boundary treatments of brick walls with railings, and the open space. Concerns were raised over the height of the proposed scheme as it would 'be at odds with the established pair' (para. 11), and that the proposed width 'would cause visual unbalance' as it would 'alter and erode the appearance and layout of the established paired villa development type' (para. 12). Concern over the loss of the green space, loss of boundary treatment and the increasing the visibility of the side elevation of the new development in the street scene was also raised.

Therefore, the proposed scheme was considered to result in harm (less than substantial - para.15) to the character of the conservation area, but the public benefits would not outweigh the harm.

### 3.5. Development of Proposed Scheme

A revised scheme would need to take into account the comments received, in summary:

1. Height,
2. Width,
3. The appearance and layout of the established paired villa,
4. The loss of the green space,
5. The loss of boundary treatment,
6. Increasing the visibility of the side elevation.

The building height should be set by the existing, historic development that contribute to the character of the conservation area. The height should ideally be subservient to allow a visual recognition of the new development.

The width of the new building should be informed by the width of the existing, historic buildings, and should either be the same to allow for a continuation of the rhythm, or subservient to allow a visual recognition of the new development.

The street is formed of paired villas and terraces, and therefore the alteration from a pair to a group of three could be acceptable within the street pattern.

The proposed Site was originally constructed as a Walled Garden and historically would have presented a very different appearance to the street scene with a tall, brick wall. The later glasshouses or any established trees may have been visible over the wall. Whilst the Walled Garden was lost in the early 1900's, the space then became part of the Recreational Grounds, and changed between wooded to open grass land. This space then altered again with the changes to the entrance to the recreational ground (via Rogue Lane, that changed from a narrow access track leading to a public house to the current vehicular road with

footpaths), the development of the Veteran's Club and the terrace of five houses. This changed the setting around the entrance to Rogues Lane.

The green space can be partially retained with care and design, but this would have impact on the creation of any half-basements due to the protection of tree roots. Whilst this half basement would replicate the adjoining dwellings, it would not be subservient in scale.

The loss of the boundary treatment could be addressed with careful design and enhanced with sensitive landscaping.

The increase in visibility of the built form will have a limited impact on the character, but as with the terrace of five houses, careful landscaping, and good design can reduce the visual impact.

### 3.6. Proposed Scheme

The proposed scheme looks to create a three-storey building that will offer three, 1-bedroom self-contained units. The scale and proportions have been influenced by the adjoining properties but are subservient to respect the pair of villas. The proposed boundary treatment replicates the established low wall with railings above. Behind the railings a hedge retains the greenness of the space. A new returning boundary wall is formed of brick which adjusts to suit the topology and responds to the brick walls seen within the area.



Figure 17 - Architects impression of the proposed new development

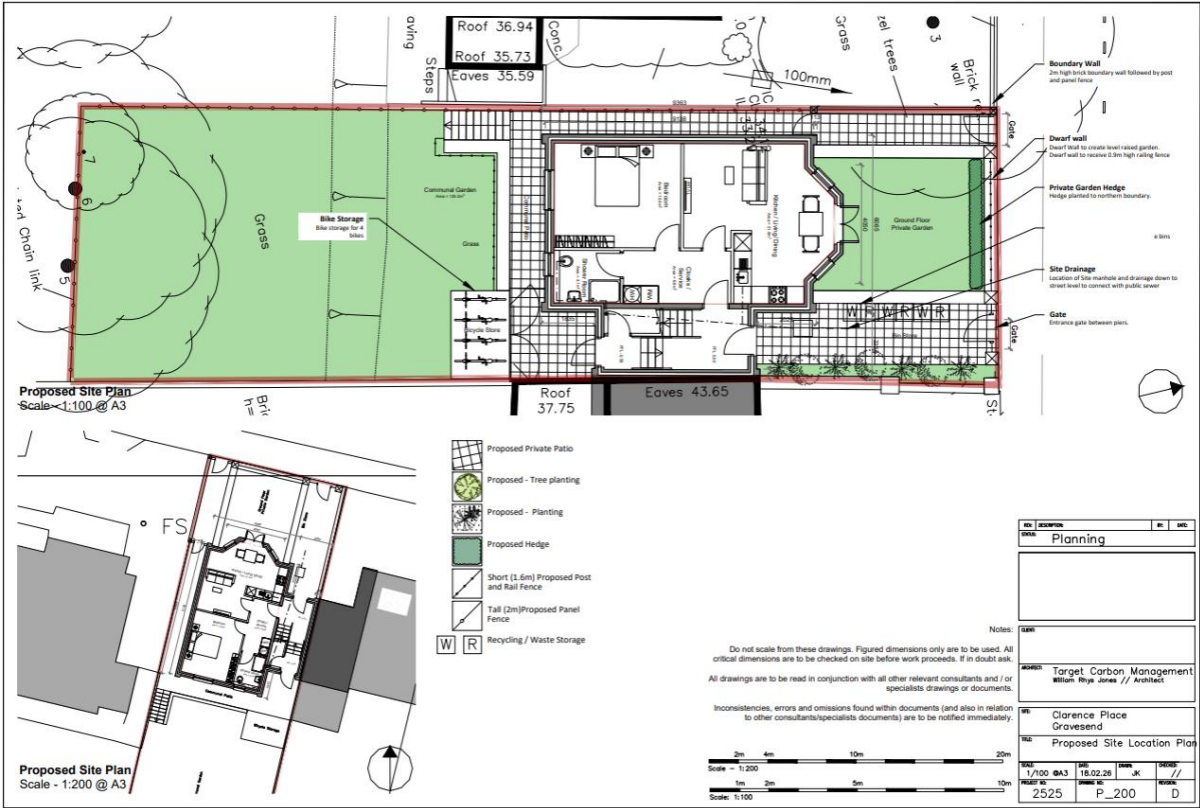


Figure 18 - proposed site plan

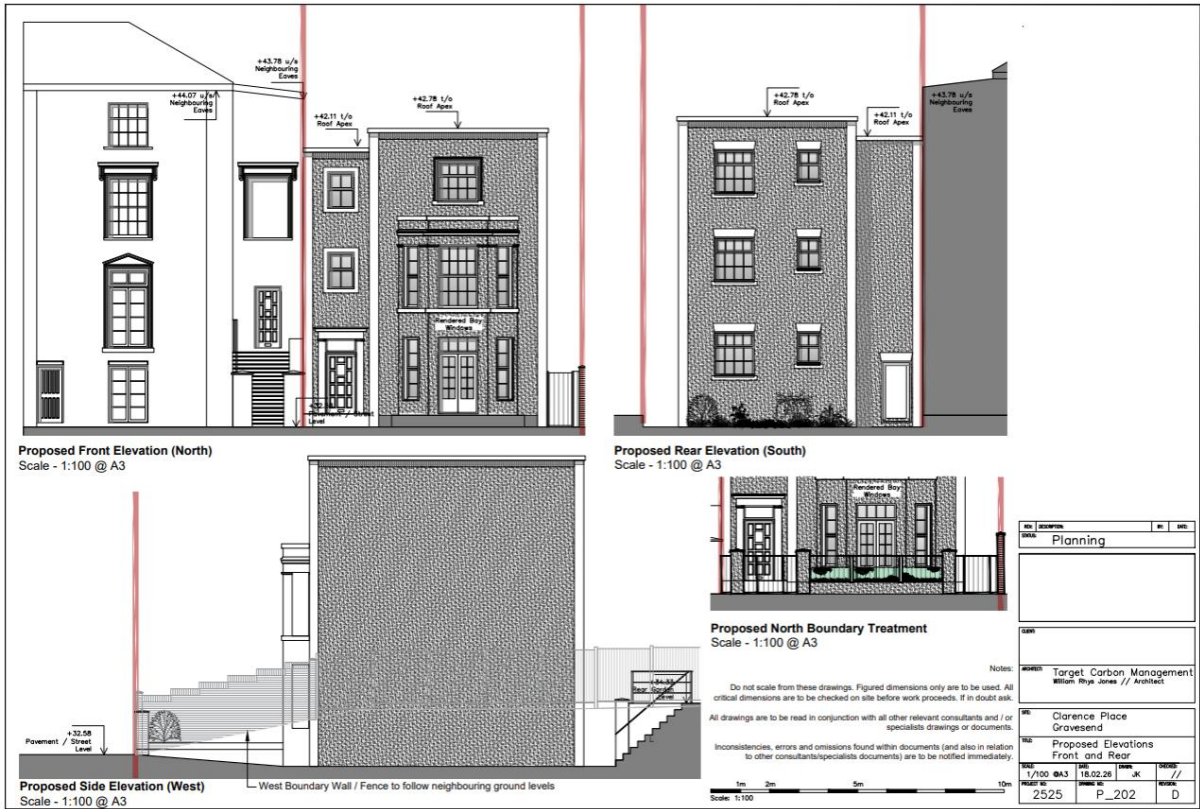


Figure 19 - proposed elevations

## 4. Impact Assessment

### 4.1. Criteria for assessment

In 2008, the then English Heritage (now Historic England) published their '*Conservation Principles, Policies & Guidance*', which provided a framework and guidance on which to assess proposed works to historic buildings and other heritage assets.

Within this document, they defined 'conservation' as:

*'the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations'*

It is this advice and ethos that the proposed impact of the works is assessed against the 'special architectural and historic interest' and significance of the building and its setting.

The level of change will be assessed on the following criteria:

|                            |                                                                                                                                                                                                              |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Substantial Harm           | The proposed changes will seriously alter or damage the overall setting and character of the heritage asset or result in a total or considerable loss of historic/ significant fabric.                       |
| Harm                       | The proposed changes will alter or damage the overall setting and character of the heritage asset or result in a total or considerable loss of historic/ significant fabric.                                 |
| Less than substantial harm | The proposed changes will cause minor changes to the understanding or cause small harm to the overall setting and character of the heritage asset or result in a minor loss of historic/ significant fabric. |
| Neutral                    | The proposed works will cause no harm to the significance of the heritage asset or its setting but will not contribute to enhanced understanding or reinforce the significance.                              |
| Positive / Improvement     | The proposed scheme will improve the understanding of or the setting of the heritage asset or will help protect the asset for future generations.                                                            |

Whilst consequential change is not part of the assessment process, it is worth considering when considering impact on a heritage asset.

### 4.2. Impact on the setting of the Listed Building

The setting of a listed building is not (and should not) be considered within a standard or arbitrary measurement but should be considered on an individual basis, especially if a group setting is applicable. The setting of a listed building is not considered from the public realm, but includes private land, wider views and any connections or relationships. The setting itself is not designated but can form an important part of the significance of a building. 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.

Historic England provide the following guidance:

*All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to*

*accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change.*

#### 4.3. Impact on the Character of the Conservation Area

The proposed scheme will result in the loss of an established tree but looks to form a new building that responds to the historic development and the changes that have occurred to this part of the conservation area. As the NPPF states, the local planning authority should look for opportunities for new development within a conservation area, but where the proposals preserve or enhance, they should be treated favourable (para. 219).

The revised scheme has considered the previous comments and re-addressed the scale and form of the building and has improved the boundary treatments so that they work within the character of the conservation area. The original 1830s scheme looked to create a massive extension to Gravesend, and as a result, it doubled the population in twenty years. However, this scheme is noted by Pevsner as not being completed, with the dividing line at Clarence Place. The historic OS maps show a private Walled Garden and public house with large grounds that have been lost and replaced. Other development has occurred both in the local vicinity and within the wider setting, and this development has added to the interest and character of the area.

Whilst the new development will result in the loss of a space, the revised scheme has addressed the concerns raised, and now offers a subservient building, that is considered to compliment the character of the conservation area and that will contribute to the required housing needs within the area.

#### 4.4. Summary

As Historic England clarify,

*'Listed buildings are to be enjoyed and used, like any other building. Listed buildings can be altered, extended and sometimes even demolished within government planning guidance. The local authority uses listed building consent to make decisions that balance the site's historic significance against other issues, such as its function, condition or viability.'*

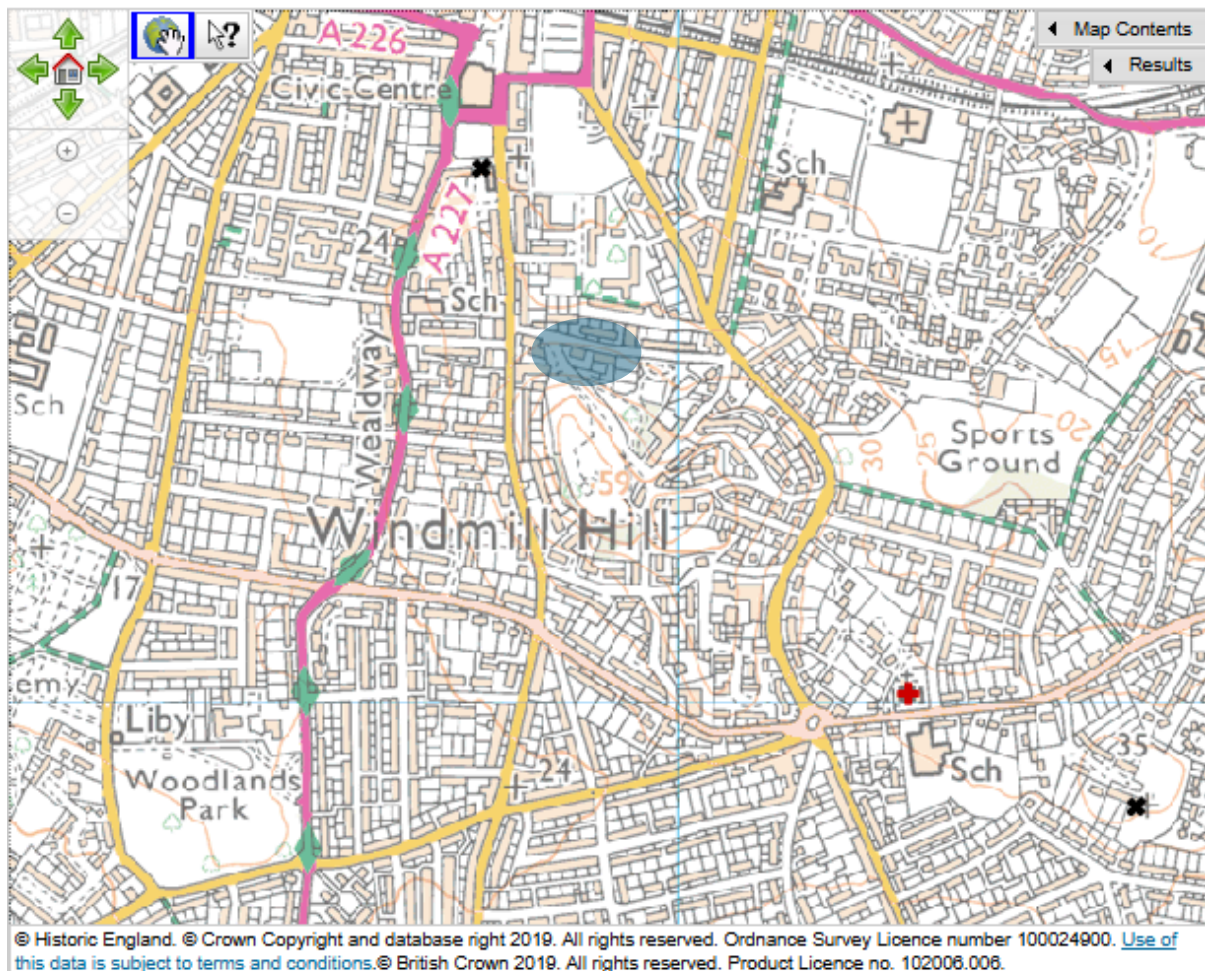
The same ethos can be applied to conservation areas, many of which derive their character from the small changes that have occurred over time. It is considered that the proposed does not have an impact on the character, appearance, and significance to the designated heritage assets. It does cause a slight change to the appearance of the pair of villas, but the development of the area was formed on a mix of built form, and this continues the understanding.

The scheme has been developed and assessed against the significance of the site and its surrounding heritage assets (paragraphs 215, 219 & 220 of the NPPF). Whilst the proposed scheme is considered to cause a low degree of harm to the setting of the Windmill Hill Conservation Area by the loss of some of the open space, this harm has been minimised, and that the remaining harm is justified.

## Appendix 1 - Historic Environment Records (HER)

Search: Gravesend

Date: 18/02/26



### Legend

- |                                               |                                               |
|-----------------------------------------------|-----------------------------------------------|
| ▲ Listed Building (NHLE)                      | ■ Scheduled Monument (centre point)           |
| ■ EH PastScape                                | ■ Registered Park/Garden (centre point)       |
| ○ Local HER record points                     | ■ Registered Battlefield (centre point)       |
| ▲ Local HER record polygons                   | ■ Protected Wreck Site (centre point)         |
| ○ National Trust HBSMR                        | ■ World Heritage Site                         |
| ■ Building Preservation Notice                | ■ Certificate of Immunity                     |
| ◆ Designation Decision Records De-listed      | ✱ Designation Decision Records Non-designated |
| ● Parks and Gardens (Non Statutory Data)      | ■ Expired Certificate Of Immunity             |
| ✱ Church Heritage Record (Non Statutory Data) | ✱ NMR Excavation Index                        |

Figure 20 – Historic Environment Records. Taken from

No HER for the area. This does not mean that there is no archaeology or historic environment interest, it is just none that has been recorded.