

HERITAGE STATEMENT

INPOST PARCEL LOCKER, GRAVESEND RAILWAY STATION,
GRAVESEND DA11 0HP

PREPARED ON BEHALF OF
INPOST UK



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NL JONES
PLANNING

www.nljonesplanning.com

Duke House Business Hub, Duke House, Skipton, BD23 2HQ

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Contents

1	Introduction	1
2	Planning policy framework	3
3	Statement of significance	4
4	Heritage assessment	5
5	Summary and conclusions	6

Appendices

Appendix 1	Site Photograph
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1.1 This Heritage Statement (the 'Statement') has been prepared on behalf of InPost (the Applicant) in support of planning and listed building consent applications for the siting of an InPost parcel locker at Gravesend Railway Station, DA11 0HP.

- **Planning Drawings:**
 - Location Plan ref. L(00) 001 P1;
 - Existing Elevations ref. L(02) 001 P1;
 - Proposed Plans ref. L(01) 101 P1, and
 - Proposed Elevations ref. L(02) 101 P1.

1.3 The InPost Locker will be located within the curtilage of Gravesend Railway Station. It will be positioned on a paved area of hardstanding, within a walled enclosure to east of the main station building, fronting onto Rathmore Road. As such, the locker can be accessed directly from Rathmore Road, without entering the station building

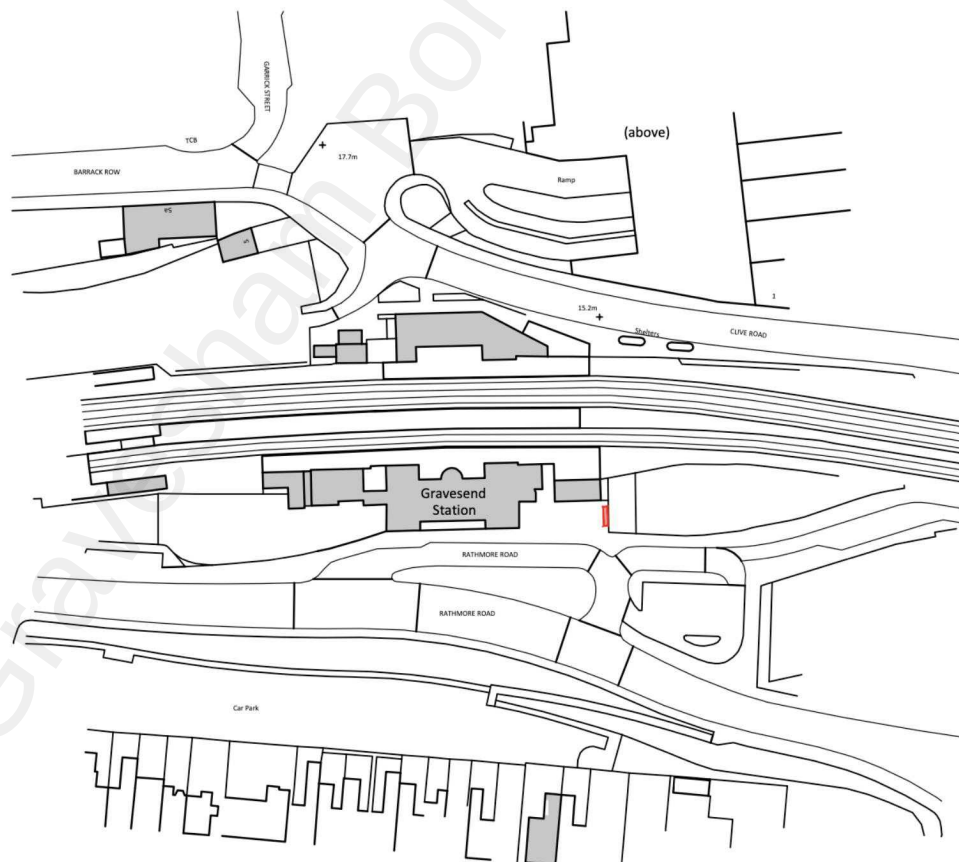


Figure 1 – Location Plan

- 1.4 Gravesend Station is a Grade II Listed Building. It is not located within a conservation area.
- 1.5 In accordance with the requirements of para 194 of the NPPF, this Statement describes the significance of the identified designated heritage asset. The purpose of this Statement is to inform the determination of these applications by assessing the effects of the proposal on the historic built environment. Specifically, the Statement assesses the significance of the listed building and the effect of the proposals on that significance.
- 1.6 The content of this Statement has therefore been set out as follows:
 1. Introduction
 2. Planning Policy Framework
 3. Statement of Significance
 4. Heritage Assessment
 5. Conclusion

2 PLANNING POLICY FRAMEWORK

- 2.1 Sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 require the decision maker to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.
- 2.2 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest, and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.3 Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.
- 2.4 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described at paragraphs 195 and 196. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test.
- 2.5 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) states that some heritage-specific benefits can be public benefits. Paragraph 18a 018-20190723 of the NPPG states that it is important to be explicit about the category of harm (that is, whether paragraph 201 -202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”

The Local Plan Core Strategy (Sep 2014)

- 2.6 Policy CS19 Development and Design Principles sets out the Council's approach to achieving good design. The Council will require new development to, inter alia:
- Have regard to local context (including scale, height, materials, heritage assets) and make a positive contribution to the street scene, public realm and character of the area.
- 2.7 Policy CS20 Heritage and the Historic Environment confirms the Council's commitment to securing the preservation, protection and enhancement of its heritage. It advises that when considering the impact of 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.

The Saved policies from Gravesham Local Plan First Review (Nov 1994, updated 2014)

- 2.8 Policy TC2 Listed Buildings is relevant. This advises that the Council's primary consideration for development involving alterations to listed buildings or affecting the setting will be the maintenance of the integrity of the original listed building. Proposals should be sympathetic in terms of massing, scale, appearance and materials.

3 STATEMENT OF SIGNIFICANCE

3.1 Paragraph 194 of the NPPF requires applicants to describe the significance of any heritage assets that may be affected by development proposals, including any contribution made by their setting. Accordingly, this section identifies the designated heritage assets that are relevant to the proposed development and provides an assessment of their significance.

3.2 In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the assets' significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.

Gravesend Railway Station

3.3 The site is located within the curtilage of Gravesend Railway Station. The Station is a Grade II Listed Building.

In accordance with the requirements of the NPPF para 194, the relevant historic environment record for the property has been consulted. The Historic England listing description for *Gravesend Railway Station* states the following:

1. 5277 RATHMORE ROAD

Gravesend Railway Station (Up Side) TQ 6474 SE 1/171

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2. Built in 1849. This consists of a central portion of 1 storey stock brick with a cornice and colonnade of 4 columns, now boxed in and 3-light sashes behind. This portion has a room with a 3-light bow window looking on to the platform. The central block is flanked by 2 2-storey stock brick pavilions with stuccoed cornices. 1 sash to each and a 3-light sash window on the ground floor, on the left-hand side incorporating a door. Each of these pavilions is in turn flanked by a recessed portion of 2 storeys stock brick with 1 sash and a round-headed doorcase with fanlight.

3.4 The listing description for the Railway Station demonstrates that the significance of the listed building relates principally to the Station building itself, rather than the platforms or staircases, or other structures. Specifically, no reference is made in the listing to the separate building, or its associated walls, located to the east of the main station building, where the InPost Locker will be cited.

4 HERITAGE ASSESSMENT

- 4.1 The proposals comprise the siting of an InPost Parcel Locker within the curtilage of the listed building at Gravesend Railway Station.
- 4.2 The locker will be located outside the station building. It will be installed in a relatively discrete location, on a paved area of hardstanding to the east of the main building, adjacent to a brick wall.
- 4.3 The relevant heritage assets are the Grade II listed Station Building. The significance of this assets has been assessed in the preceding section.
- 4.4 The listing description for the Railway Station demonstrates that the significance of the listed building relates principally to the architectural merit of the main station building itself, rather than platforms, staircases, or other structures. The additional single storey building and its associated walls, located to the east of the main station – where the locker is to be cited - is not referenced.
- 4.5 The locker will not be fixed to the station concourse or building structure in any permanent manner. Rather, it is 'free standing' and can be easily relocated without causing any damage to the listed building.
- 4.6 Consequently, the locker is therefore not considered to result in harm to the significance of the Grade II listed station building or its setting.

5 SUMMARY AND CONCLUSIONS

- 5.1 This Heritage Statement (the 'Statement') has been prepared on behalf of InPost (the Applicant) in support of retrospective planning and listed building consent applications for the siting of an InPost parcel locker at Gravesend Railway Station, DA11 OHP. It provides a proportionate assessment of the significance of the relevant heritage assets (namely the Grade II listed Gravesend Station).
- 5.2 In this respect, the locker will be located outside the station building. It will be installed in a relatively discrete location, on a paved area of hardstanding to the east of the main building, adjacent to a brick wall.
- 5.3 It will not be fixed to the station concourse or building structure in any permanent manner. Rather, it is 'free standing' and can be easily relocated without causing any damage to the listed building.
- 5.4 The Statement concludes that given the scale and nature of the proposals, and the specific location of the locker, the locker is not considered to result in harm to the significance of the Grade II listed station building or its setting.
- 5.5 The Statement therefore demonstrates that the proposals are in accordance with relevant planning policy and guidance, in particular, the NPPF, Core Strategy Policy CS20 and saved Local Plan Policy TC2, in respect of heritage assets.

APPENDIX 1 – SITE PHOTOGRAPH

Gravesham Borough Council

Photograph 1 – Proposed Location of InPost Parcel Locker, Gravesend Railway Station

