

2 MILTON ROAD, GRAVESEND
KENT, DA12 2RE

PLANNING & HERITAGE STATEMENT



HUL Ref: 2407.1539 | 08 August 2024

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HS1 LISTING DESCRIPTIONS

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
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2					



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1.0 INTRODUCTION

- 1.1. This Heritage Statement has been produced by **heritage** unlimited to support a planning application at 2 Milton Road, for a full width ground floor rear extension, conversion of the first and second floor to create a two bedroom self-contained flat, and erection of front and rear dormer windows.
- 1.2. No.1 Milton Road, The New Inn, adjoining the site to the west, is a grade II listed building, whilst nos.2-5, which formed part of the same original development, are locally listed. The property is also located within the King Street Conservation Area.
- 1.3. In May 2022, The New Inn was destroyed by fire with extensive fire damage also occurring to no.2 as it travelled through the roof and first floor of the property. Both properties remain in a ruinous condition.
- 1.4. Listed buildings and Conservation Areas are defined by the National Planning Policy Framework (2023) (NPPF) as designated heritage assets. As the proposed development affects one or more heritage assets, paragraph 200 of the NPPF requires a Heritage Statement to support a planning application. This document has been prepared in accordance with the requirements of the NPPF.
- 1.5. The purpose of a Heritage Statement is to identify the significance of any heritage asset affected by the proposed development, the impact the proposed development will have upon the identified significance and justification for the proposed development. The Heritage Statement also needs to assess the proposed work in accordance with the statutory tests provided in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.6. This Heritage Statement should be read in conjunction with architectural plans and other supporting documents, which form this planning application.
- 1.7. This report has been compiled by Shaun Moger MSc Historic Building Cons and Paul Clarke BA (Hons) Arch Cons and is based on desk-based research and a site visit carried out in July 2024.



2.0 SITE LOCATION AND CONTEXT

- 2.1. No.2 Milton Road is located on the north side of Milton Road, approximately 12m east of the junction with Queen Street and King Street. It is the second property from the west in a row of seven properties of which nos.1-5 form part of the same original early 18th century development.
- 2.2. The property is two storeys plus attic and is in commercial use, accessed from Milton Road via a central door in the modern shopfront. The first floor window of the front (south) elevation is also modern, having been enlarged and replaced with a uPVC unit. To the rear is a two storey post-construction rear addition and a small open yard which is fully enclosed by rear additions to nos.1 and 3 and the modern Royal Mail building to the north, no.2 Queen Street.
- 2.3. The adjacent property to the west, no.1 Milton Road, is the former New Inn pub and 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. Though part of the same original development, nos.2-5 are not listed and instead considered to be non-designated heritage assets of local interest.
- 2.4. 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 continue to be in their fire damaged conditions with barriers enclosing nos.1 and 2.
- 2.5. On the opposite side of Milton Road is a row of historic properties, both listed and locally listed, which form a continuous frontage. On the corner of Parrock Street, is the Roman Catholic Church of St John the Evangelist with nos.157-158 Milton Road adjoining to the east. These, along with The Grapes Pub to the east corner of the block, are grade II listed buildings, whilst nos.154-156 are buildings of local interest.





Fig.1: Site location shown in red.



Fig.2: No.2 Milton Road, seen in context with the ruin of The New Inn (no.1), left, and nos.3-5 to the right.



Fig.3: The property seen looking east from the corner of Milton Road and Queen Street, additional listed buildings to right.



Fig.4: View southeast from Queen Street.



Fig.5: Open yard area to the rear of the property, looking north away from the property.



Fig.6: Rear (north) elevation.



Fig.7: Rear addition.



Fig.8: Looking west from the yard towards Queen Street, screened by existing development.



Fig.9: View north from the attic space over the exposed first floor of the property, destroyed by fire.



Fig.10: The burnt timbers of no.2 and fire damage extending into no.3.



Fig.11: Existing rear dormer and chimney of no.3.



Fig.12: Nos.1-5 Milton Road in 2021, prior to the fire.

3.0 IDENTIFIED HERITAGE ASSETS

- 3.1. The National Planning Policy Framework (NPPF) requires that all heritage assets affected by the proposed development are identified and their significance, which includes setting, are described. The level of 'harm' the proposed works will have to the identified heritage assets also needs to be determined within the context of a Heritage Statement.
- 3.2. As identified in the introduction, the site is adjacent to a grade II listed building, no.1 Milton Road/the New Inn, and consequently nos.2-5 are considered locally listed. The site is also located within the King Street Conservation Area.

No.1 Milton Road/The New Inn

- 3.3. No.1 Milton Road/The New Inn, is a grade II listed building. A description of the property (at the time of listing) can be found in the appendix **HS1**. In contrast, the property is now in ruin, following a fire in May 2022.
- 3.4. As nos.1-5 formed part of the same original development, and have been closely related since this time, they will be described together below.

Nos.2-5 Milton Road

- 3.5. Unlike no.1, nos.2-5 Milton Road are instead non-designated heritage assets, described by the LPA as 'Key Unlisted Buildings' and are also cited in the listing description of no.1 as being of local interest.

Nos.1-5 Milton Road Historic Context

- 3.6. The building which now forms nos.1-5 is understood to have been constructed in the early 18th century. The earliest reference to the property is believed to be in April 1734, when the building was the family home of a Dr. Holker, who accommodated the Prince and Princess of Orange when their return to Holland was delayed by bad weather. Whilst accounts vary slightly, the origin of 'The New Inn' is thought to date to c.1780, when the coaching inn, which then had a large garden with a bowling green to the rear, was sold and renamed the 'New Inn'. This may be because the licensee was from the 'New Tavern', which had relocated from the Fort Gardens, Milton Place.



- 3.7. The extent of the building that the coaching inn and New Inn occupied across history appears to be varied and speculated upon, albeit that the western three bays, no.1, has been the most enduring and is commonly seen in 19th and 20th century depictions. The New Inn also served additional purposes with Pigot's Directory of 1832 stating it to be the Excise Office. Confusingly, despite the known date of 1780, previous pub signs of the 1970s and 1980s have read "New Inn 1840", possibly suggesting some form of change of ownership or use at this time. In 1869-70 the New Inn was part of *The Licensed Victuallers Tea Association*, a consortium of publicans and wine merchants who advertised selling tea in response to grocers' selling beer and wine, and is listed as acting as the Principle Agent and Depot for Gravesend.

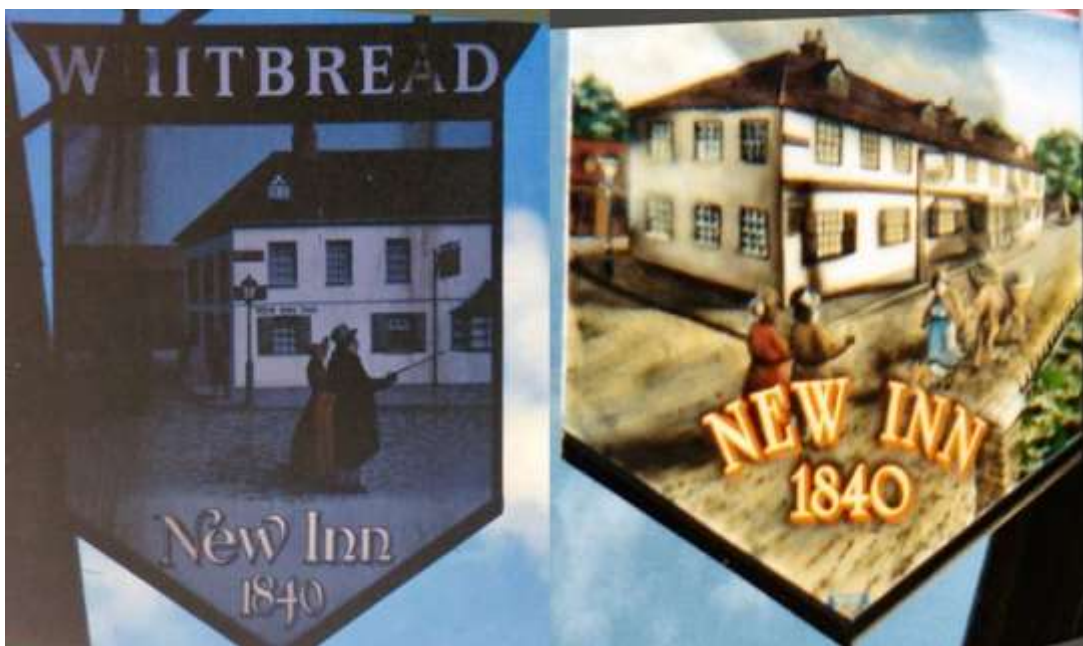


Fig.13: Previous pub signs, 1974 (left) and 1986 (right), showing the date 1840 rather than the known date of the first use of the name New Inn c.1780.

- 3.8. The frontage of the pub and development has changed on numerous occasions with the earliest known iteration being shown on an engraving c.1835, showing a relatively plain façade to no.1 whilst an ornate frontage spans the ground floor of the present nos.3-4 flanked by canopied windows to nos.2 and 5. The door to the frontage is the only entrance onto Milton Road with another door seen to the west side elevation onto Queen Street. The 1840 Tithe Map also appears to show a sizeable rear wing behind no.5, forming an L-shaped plan form and adjacent to which is a market garden, identified on the record as New Inn Garden, owned by William Berkley, occupied by John Heard.



Fig.14: The principal north elevation of the property, seen from Milton Road.

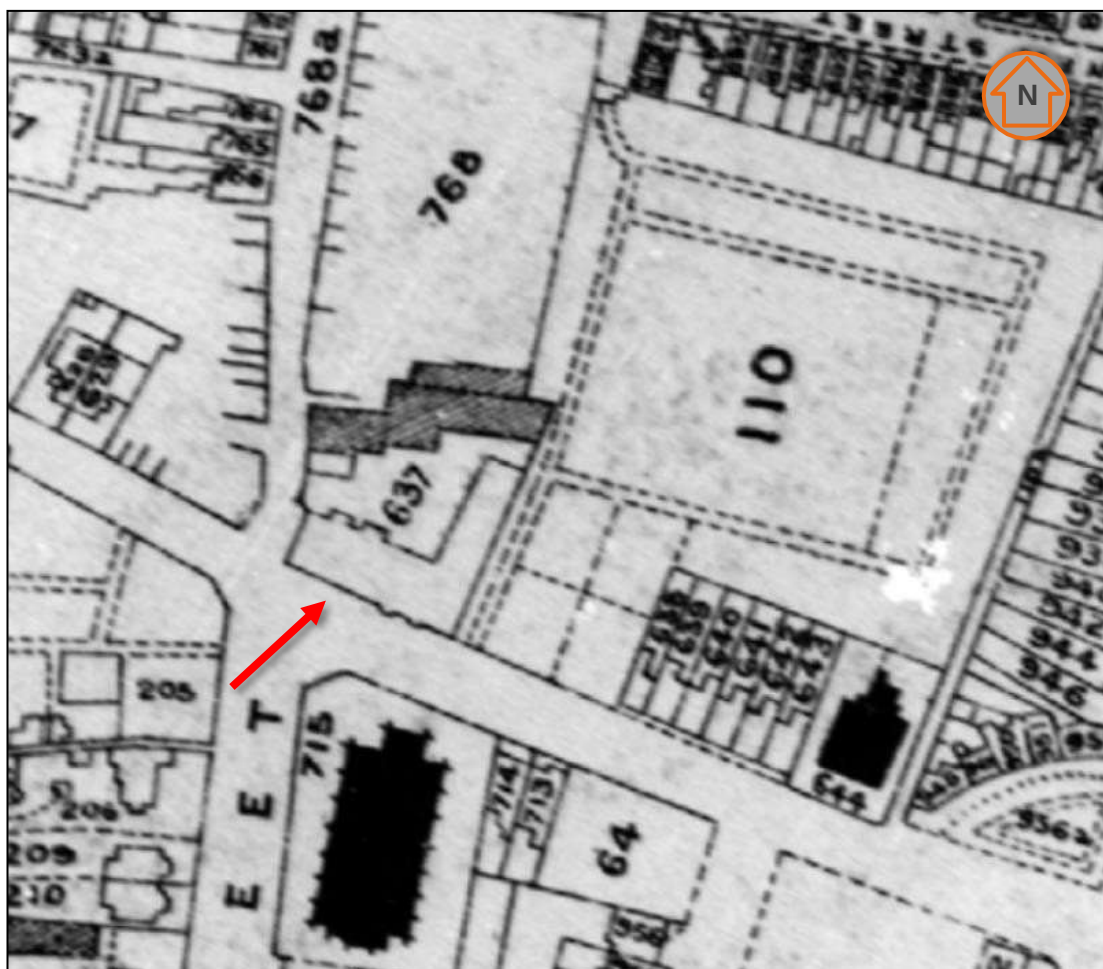


Fig.15: 1840 Tithe Map.

- 3.9. An early iteration of the most recent pub frontage at no.1 is first seen in a historic photo c.1900 and in greater detail in an image c.1913. The frontage includes painted, relatively slim Victorian style fascia and other hoardings advertising Rigdens Brewery (Faversham), pilasters, a canted corner entrance door, plus two other doors into the Milton Road (south) elevation.
- 3.10. To the right of the 1900 image, a separate frontage is seen to no.2 for E. Baker, who the 1871, 1881, and 1891 censuses identify as a watchmaker and jeweller. It is therefore possible that the frontages were fitted within this timeframe, or perhaps even earlier, with no.2 having been occupied by a James Charles Taylor, a master butcher according to the 1861 census.
- 3.11. At this time, the Ordnance Survey map published in 1866 shows the New Inn occupying no.1 and nos.2-5 (plus newly developed 6-7) identified as New Inn Place. A number of additions are also seen to the rear of all properties and the projecting frontage of nos.3-4 is also in situ.



Fig.16: Historic photo c.1900

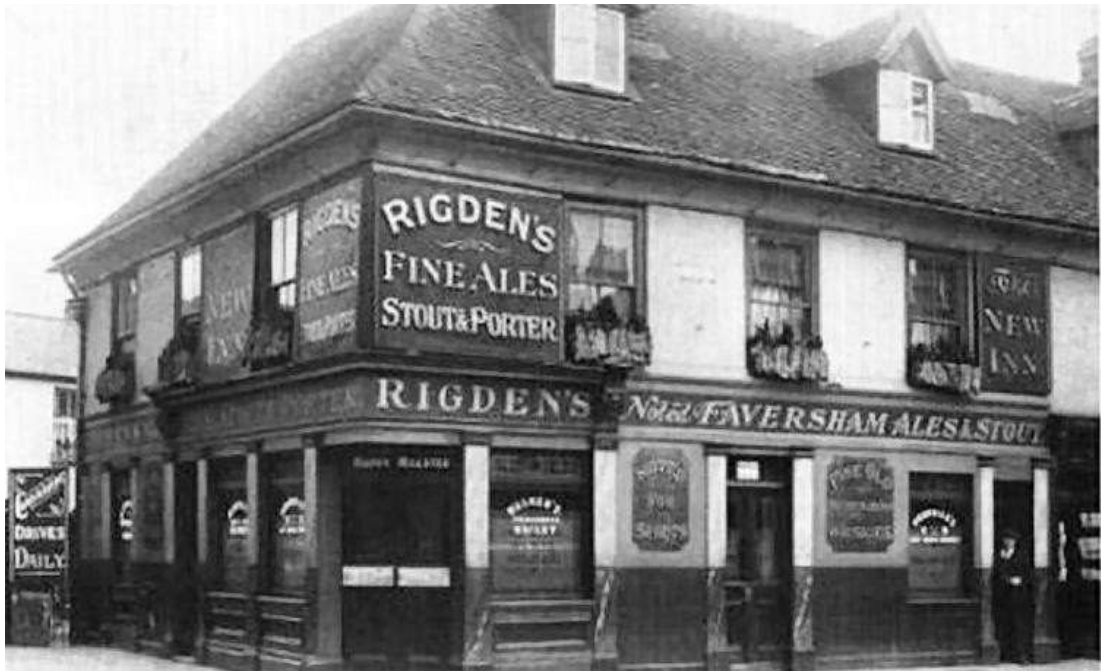


Fig.17: Historic photo c.1913

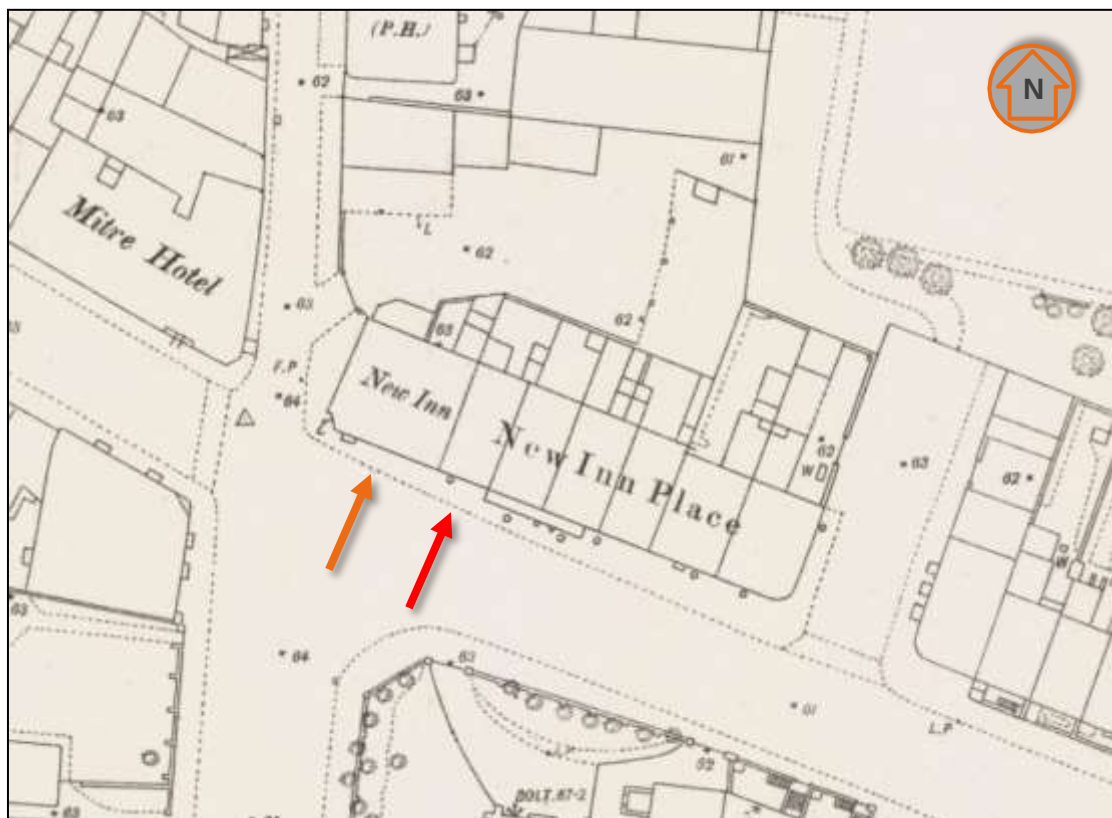


Fig.18: Ordnance Survey map, surveyed 1863, published 1866. New Inn shown by the orange arrow and no.2 by red, then known as New Inn Place and occupied by a butcher. Numerous additions are seen to the rear of all properties and the projecting frontage of nos.3 and 4 is also shown.

- 3.12. In the subsequent maps of 1899 and 1909, further additions are seen to the rear of the properties and development of the land to the north and northeast, including the former New Inn Garden shown on the Tithe Map. The development at this time is seen to fully enclose the rear of no.2.



Fig.19: Ordnance Survey map, revised 1895, published 1899.

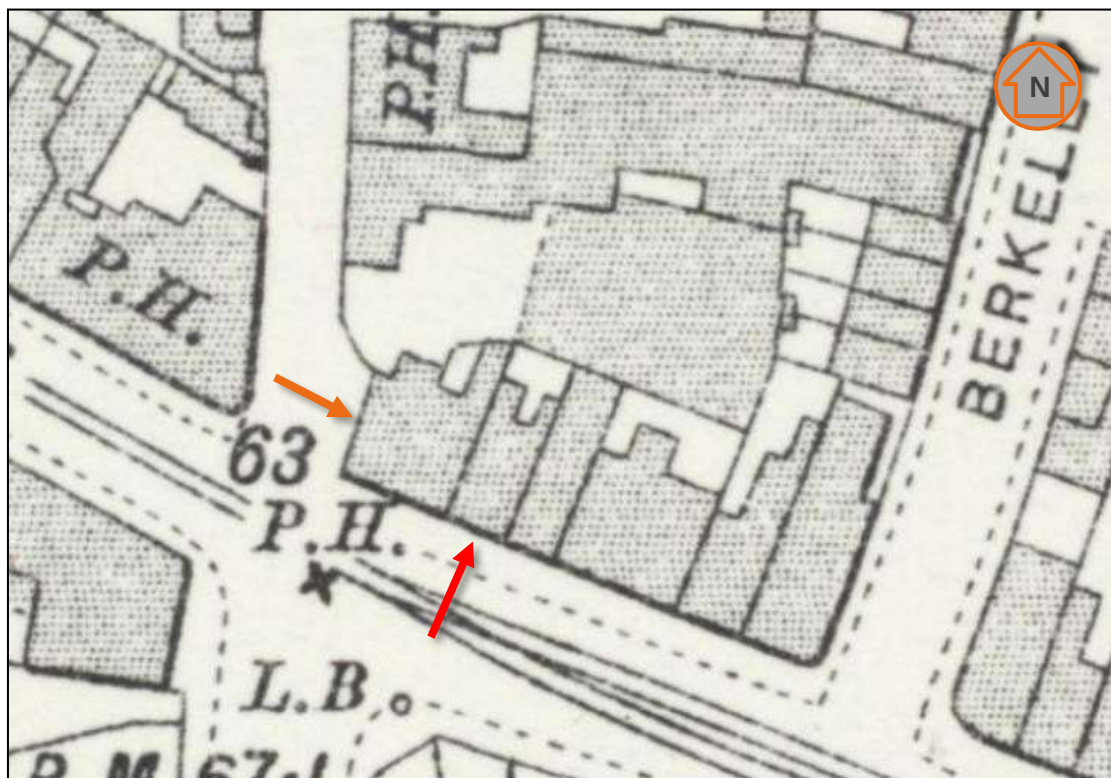


Fig.20: Ordnance Survey map, revised 1907, published 1909.

- 3.13. Between the Ordnance Survey maps of 1933, 1954, and 1965, further additions and alterations are made to the rear of the properties. This includes reconfiguration of the additions and ground floor layout of no.2 and gradual total infill of nos.4-6.

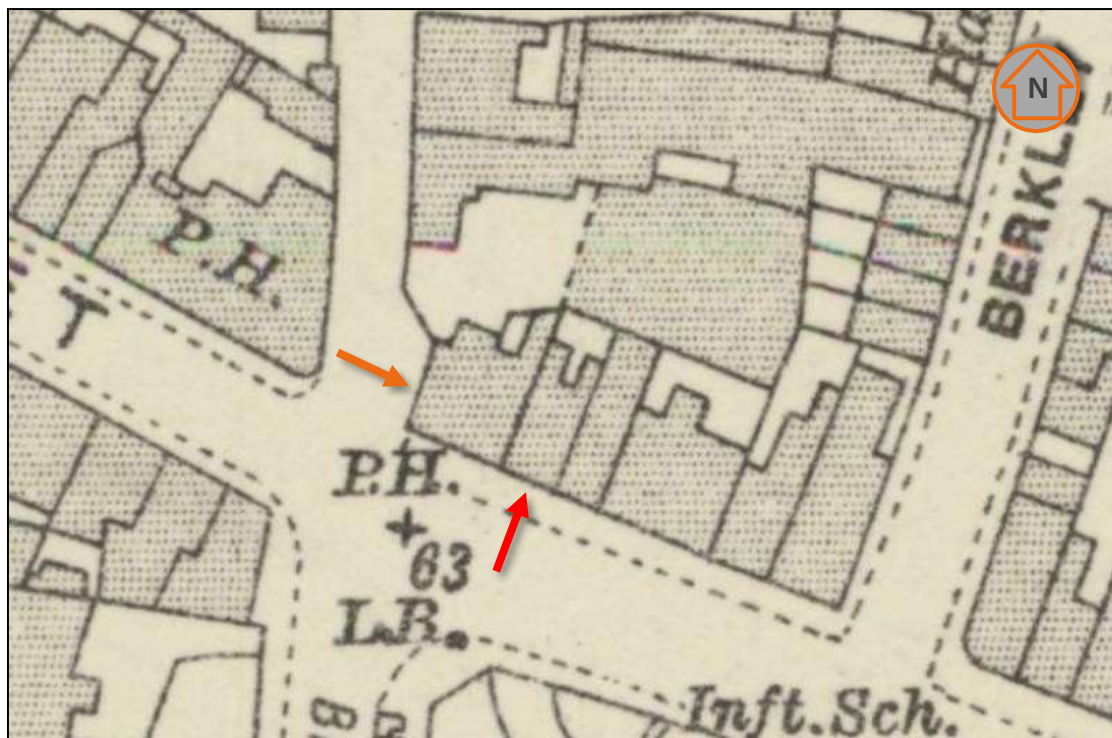


Fig.21: Ordnance Survey map, revised 1932, published 1933.

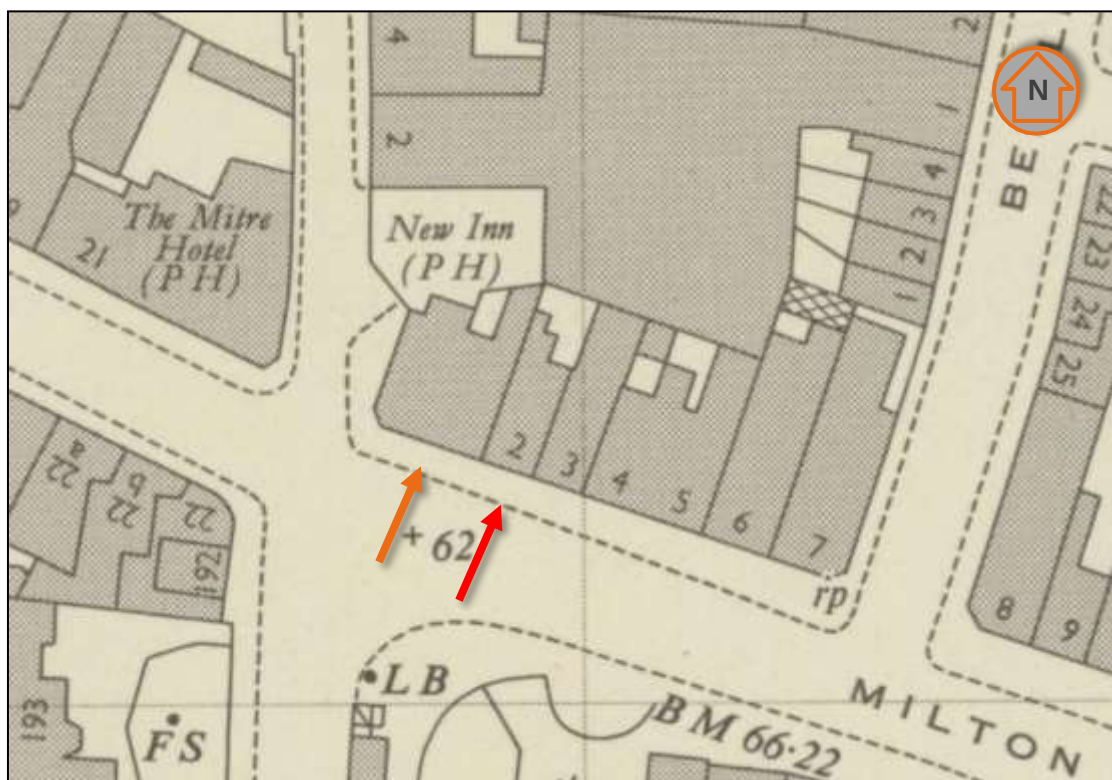


Fig.22: Ordnance Survey map, surveyed 1953, published 1954.



Fig.23: Ordnance Survey map, surveyed 1964, published 1965.

King Street Conservation Area

- 3.14. King Street Conservation Area was designated in 1980 and extended in 1998, 2001, and 2009. The King Street Conservation Area Character Appraisal was adopted in 2009.
- 3.15. The King Street Conservation Area encompasses much of the 18th and 19th century commercial expansion of Gravesend. It is focused on the central east-west highway of New Road, King Street, and Milton Road that was established when New Road was laid in 1801, as part of a stagecoach route to London. The streets are lined with commercial buildings, most of them ground floor shops and accommodation above, interspersed with civic buildings and some residential houses. The new carriageway through the town led to the establishment of many inns and coaching houses, some of which remain in King Street and Milton Road. The coming of the railway in the 1850s further strengthened the new developments to the south, transforming the area from rural hinterland to dense urban commercial and residential streets.

- 3.16. Since the street pattern and building line was established in the 19th century, there has been an ongoing replacement and alteration of buildings, leading to a rich variety of architecture. There are many key historic buildings however, including St John's RC Church, the County Court, and some surviving 19th century banks and inns. Almost all of the buildings in the Conservation Area front the back edge of the pavement in continuous rows, yet the mixture of shopfronts and building styles is accommodated within a spacious streetscape.
- 3.17. The property is located within Character Area 1: King Street, Parrock Street (north) & Milton Road. These streets comprise much of the eastern half of the town's commercial and retail centre. The three roads were created in their current form to provide a stagecoach trade and their wide, busy appearance still suits their historic role in Gravesend. They are lined with large, tall buildings and are comparatively broad which affords them a spaciousness that can accommodate traffic and pedestrians.
- 3.18. St John's Church is a stock brick building with stone dressings in the Gothic revival style. It sits close to the pavement on the Milton Road elevation with long thin windows and a sheer tower dominating the street scene. On the Parrock Street elevation, the church is set behind a small garden but still fills the skyline. The church forms a group with the attached school, which has a smooth stone façade and leads into an interesting row of tall early 19th century buildings that terminate with The Grapes Public House. Nos. 157 and 158 at the south side of Milton Road form one of the finest houses in the street. The grand ashlar façade with classical details clearly distinguishes it from the modest scale and treatment of the early 19th century terraces opposite.

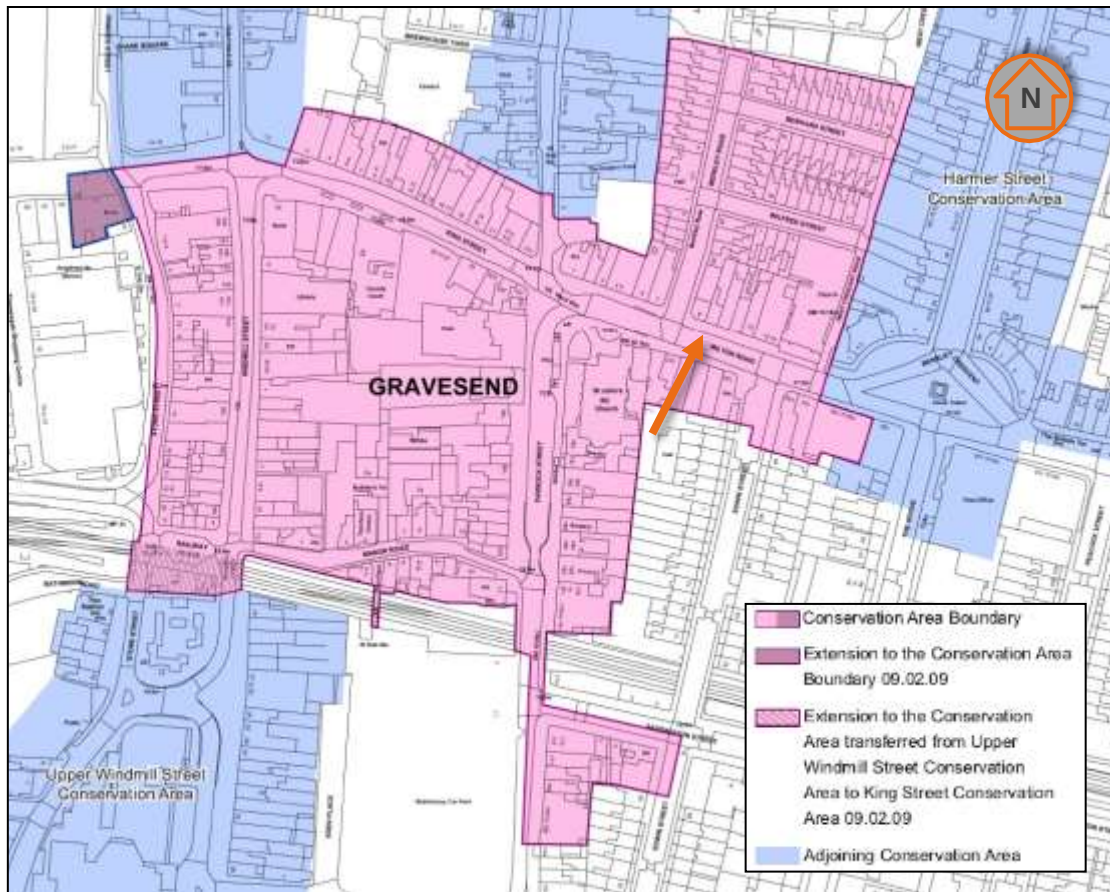


Fig.24: King Street Conservation Area (Source: Gravesham Borough Council).

Other Listed Buildings

- 3.19. St John's Catholic Church and nos.157-158 opposite the site on the south side of Milton Road are grade II listed buildings. Listing descriptions can be found in the appendix **HS1**.
- 3.20. Due to the proposal relating primarily to internal works and a rear addition with the works to front comprising of reinstatement of historic features, it is concluded that there will be no harm to the setting and special interest of these listed buildings and they will not be assessed further in later sections of this report.

4.0 PLANNING LEGISLATION AND POLICIES

Legislation

- 4.1. The legislative framework for the preservation and enhancement of listed buildings and conservation areas are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England, defines preservation in this context, as not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 4.2. In 2014, a ruling by the Court of Appeal (Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage and the National Trust) made clear that to discharge this responsibility, decision makers must give considerable importance and weight to the desirability of preserving the setting of listed buildings (and by implication other heritage assets) when carrying out the balancing exercise of judging harm against other planning considerations, as required under the National Planning Policy Framework.
- 4.3. Another ruling made in May 2017 by the Court of Appeal (Barwood Strategic Land II LLP v East Staffordshire Borough Council and the Secretary of State for Communities and Local Government), upheld a High Court ruling, that subordinates National Planning Policy Framework development presumptions to the statutory authority of an up-to-date local plan, as the NPPF is no more than ‘guidance for decision-makers, without the force of statute behind it. Paragraph 13 of the decision states, *‘The NPPF is the Government’s planning policy for England. It does not have the force of statute, and, ought not to be treated as if it did. Indeed, as one might expect, it acknowledges and reinforces the statutory presumption in favour of the development plan, and it also explicitly recognizes and emphasizes its own place in the plan-led system of development control. Its “Introduction” acknowledges that “[planning] law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise”, and that “[the NPPF] must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions”. Paragraph 12 recognizes that the NPPF “does not change the statutory status of the development plan as the starting point for decision making”. Paragraph 13 describes the NPPF, correctly, as “guidance for local planning authorities and decision-takers”, which, in the context of development control decision-making, is “a material consideration in determining applications”. Paragraph 215, in “Annex 1: Implementation”, says that “due weight should be given*

to relevant policies in existing plans according to their degree of consistency with [the NPPF] (the closer the policies in the plan to the policies in [the NPPF], the greater the weight that may be given)”, but this too is guidance for decision-makers, without the force of statute behind it’.

- 4.4. Therefore, by implication, this judgment again emphasises the relative importance of sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in making planning decisions in relation to development that affects listed buildings and conservation areas.
- 4.5. Section 66(1) relates to planning applications and states, ‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.
- 4.6. As a minimum, the test provided requires the development to preserve the listed building or its setting.
- 4.7. Section 72(1) of the abovementioned Act is relevant to the proposed development and provides the statutory test against which planning permission affecting conservation areas, as designated heritage assets should be assessed by the Local Planning Authority.
- 4.8. Section 72(1) states, ‘In the exercise, with respect to any buildings or other land in a conservation area, of any... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.
- 4.9. Historic England defines preservation in this context as not harming the interest in the building, as opposed to keeping it utterly unchanged.

National Planning Policy Framework (2023)

- 4.10. As mentioned above, there is a need to carry out a balancing exercise of judging harm against other planning considerations as required under the NPPF. The NPPF sets out the Government’s planning policies for England and how these are to be applied. The guiding principle of the document is a presumption in favour of sustainable development and the protection and enhancement of the historic environment is embedded in this approach.



- 4.11. Sustainable development is defined as meeting the needs of the present without compromising the needs of the future. Paragraph 8 of the NPPF breaks down this definition into three objectives: economic, social, and environmental. Within the environmental objective, sustainable development needs to contribute to 'protecting and enhancing our natural, built and historic environment'.
- 4.12. Paragraph 20 of the NPPF contains Strategic Policies, which provide an overall strategy for the pattern, scale and quality of development and make sufficient provision for the conservation and enhancement of the natural, built, and historic environment.
- 4.13. Section 16 of the NPPF contains policies relating to conserving and enhancing the historic environment. Within this section (paragraph 200), the Local Planning Authority requires the applicant to describe the significance of any affected heritage asset including any contribution made by their setting as part of an application.
- 4.14. Significance is defined in Annex 2 of the NPPF, as the value of a heritage asset to this and future generations because of its archaeological, architectural, artistic, or historical interest. Significance also derives not only from the asset's physical presence but also from its setting. Setting of a heritage asset is the surroundings in which the heritage asset is experienced, the extent of which is not fixed and can change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to significance of an asset.
- 4.15. Impact from a proposed development to the significance of a designated heritage asset needs to be evaluated, NPPF paragraph 205, states, 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. NPPF paragraph 206 identifies that alteration, destruction, or development within the setting of a designated heritage asset can result in harm to, or loss of, the significance of the asset and that such loss requires a clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and substantial harm or loss of grade I and grade II* listed buildings should be wholly exceptional.
- 4.16. NPPF Paragraphs 207 and 208 define the levels of harm as substantial or less than substantial. The National Planning Practice Guidance (PPG) provides useful guidance on assessing harm in relation to these definitions and gives the following example, 'In

determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'. The PPG quantifies substantial harm (NPPF paragraph 207) as total destruction while partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may therefore not be harmful to the asset. The PPG advises works that 'are moderate or minor in scale are likely to cause less than substantial harm (NPPF paragraph 208) or no harm at all'. However, it is important to consider each development in its own context as the PPG also identifies that minor works have the potential to cause substantial harm to the significance of an asset.

- 4.17. Paragraphs 207 and 208 refer to 'public benefit' as a means to outweigh the loss of or harm to a designated heritage asset. The PPG identifies that public benefit may follow many developments and as such this benefit could be anything that delivers economic, social or environmental progress which are the dimensions to sustainable development defined by NPPF Paragraph 8. The PPG states, 'Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefit'. Public benefits may include heritage benefits such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risk to heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long- term conservation.

- 4.18. The three points above relate to NPPF Paragraph 203, which requires the Local Planning Authority to take these points into account when determining applications. Although, there is no defined list of public benefits, examples of public benefit for a designated heritage asset may include:



- The restoration of a listed building.
- The improved setting of a listed building.
- The enhancement of a conservation area.

Local Planning Policy

4.19. As well as legislation and national planning policies, Gravesham Local Plan Core Strategy (2014) and Gravesham Local Plan First Review (1994) - Saved Policies (2014) contain policies relating to the historic environment. Relevant policies include:

4.20. Gravesham Local Plan Core Strategy (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.

4.21. Gravesham Local Plan First Review (1994) - Saved Policies (2014)

Policy TC2: Policy for Listed Buildings

The Borough Council will adopt the following approach to applications affecting listed buildings:-

- i. Proposals which involve the demolition of listed buildings will not be granted consent unless the applicant is able to demonstrate substantial and overriding reasons why such consent should be forthcoming. In those few cases where the Borough Council is satisfied that there is no alternative but to grant consent for such demolition, all available means will be used to secure early and appropriate redevelopment.
- ii. In the case of applications for development involving alterations or extensions to listed buildings or affecting the setting of listed buildings, the primary consideration of the Borough Council will be the maintenance of the integrity of the original listed building. Proposals will also need to be sympathetic to the listed building in terms of massing, scale, appearance and materials.
- iii. Applications for the change of use of listed buildings will be considered on their merits, in relation to the land use policies set out in this Written Statement. A major consideration will be whether the character or appearance of the listed buildings will suffer as a result.



Policy TC3: Development Affecting Conservation Areas

The Borough Council will adopt the following approach to applications for development within or affecting conservation areas:-

- i. Where development is acceptable in relation to other policies in this Plan, it will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area. The Borough Council will expect applications to contain sufficient details to enable the impact of the proposal upon the conservation area to be assessed.
- ii. The demolition of unlisted buildings will be resisted unless the Borough Council is satisfied that the existing building is harmful to the conservation area and that the proposals for redevelopment or other use of the site will be beneficial. To this end, the Borough Council may, in suitable cases, require an agreement for the replacement of the building or other suitable treatment of the site, prior to the granting of conservation area consent for demolition.



5.0 ASSESSING SIGNIFICANCE

- 5.1. Significance of a heritage asset is defined by the NPPF as the value of a heritage asset placed on it by current and future generations because of its heritage interest. This interest may be archaeological; architectural; artistic or historical. The setting of a heritage asset also contributes to its significance and is defined by the NPPF as the surrounding in which a heritage asset is experienced. In comparison, Historic England's Conservation Principles (2008) uses evidential; aesthetic; historical and communal values to define significance. These different set of values have been combined for the purpose of this report.
- 5.2. Part 4 of British Standard 7913:2013 Guide to Conservation of Historic Buildings provides information on heritage values and significance. In context, this document states, 'A wide range of factors can contribute to the significance of a historic building. As well as physical components, significance includes factors such as immediate and wider setting, use and association (e.g., with a particular event, family, community or artist and those involved in design and construction)'.
- 5.3. Identifying the values of an asset allow us to understand the degree of significance and inform us of the potential impact the proposed works will have the heritage asset and its setting. These values may be tangible, the physical fabric of the building, capable of being touched, or view such as its landscape. Also, the value may be intangible through a past event or an association with a person.
- **Evidential (archaeological) value** relates to physical aspects of the site which provide evidence from the past. This can be with built form or below ground archaeology.
 - **Historical value** is the extent to which the asset is associated with or illustrative of historic events or people.
 - **Aesthetic (architectural/artistic) value** includes design, visual, landscape and architectural qualities.
 - **Communal value** includes social, commemorative, or spiritual value, local identity, and the meaning of place for people.



5.4. The assessment of significance draws upon information contained in the section on Heritage Assets and uses the values defined above to establish the level of significance detailed below:

- Features of the asset which contribute to the principal historical and architectural interest are considered to be of **high significance**.
- Features of the asset which noticeably contribute to the overall architectural or historical Interest and may include post construction features of historic or design interest are considered to be of **medium significance**.
- Features of the asset which make a relatively minor contribution to the historic and architectural interest are considered to be of **low significance**.
- Features which do not contribute to the historic and architectural interest of the asset, and in some cases may even detract from the significance are therefore considered to be either **neutral or detracting**.

Assessing Setting

5.5. The primary guiding document for assessing setting is The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2017), produced by Historic England is the primary guiding document for assessing setting.

5.6. Setting varies from asset to asset and cannot be generically defined. Changes to the setting of heritage assets may be positive such as replacing poor development which has compromised the assets setting. It is likely that the setting of an asset has changed over time from the dynamics of human activity and natural occurrences such as weather.

5.7. The importance setting makes to the contribution to the significance of the heritage asset is often related to how the heritage asset is seen in views. This can include views looking towards the heritage asset or from the heritage asset looking outwards and may include relationships between the asset and other heritage assets, natural or topographical features. Assets may also be intended to be seen from one another in designed landscapes for aesthetic reasons.



- 5.8. Historic England's Good Practice Advice 3, The Setting of Heritage Assets (2017), notes a staged approach to proportionate decision-taking, with relevant NPPF paragraphs along with guidance contained in the National Planning Practice Guidance (PPG) for their implementation, providing the framework for the consideration of changes affecting the setting of heritage assets which should be assessed proportionately and based on the nature, extent, and level of the heritage asset's significance.
- 5.9. The Guidance recommends a five-step approach to the assessment of the effect of development on the setting of heritage assets as follows:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

Step 3: assess the effects of the proposed development whether beneficial or harmful, on that significance;

Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

Step 5: make and document the decision and monitor outcomes

Significance of New Inn, no.1 Milton Road

- 5.10. The significance of New Inn, no.1 Milton Road, listed grade II, was derived from its age, architectural value, and communal value as a long running pub which contributed to the built, commercial, and social development of Gravesend. The
- 5.11. The New Inn, no.1 Milton Road as a grade II listed building, making it a designated heritage asset, was considered to be of **high significance**. However, following destruction by fire in 2022, no historic or significant fabric remains.

Significance of No.2-5 Milton Road

- 5.12. The significance of nos.2-5 Milton Road is derived from similar factors as described above, due to them having formed part of the same original development. However, use of the buildings is historically varied and the properties have been subject to extensive external and internal changes, some of which have harmed their character, such as the loss of the front dormer at no.2 and replacement shopfront and first floor window.



- 5.13. Unlike no.1, nos.2-5 are not listed but are recognised as being of local interest, making them non-designated heritage assets and considered to be of **low-medium significance**.
- 5.14. As the adjoining property to no.1, no.2 Milton Road also sustained significant damage to the first floor and roof with the structure of the latter in particular unsalvageable. As the fenestration and frontage are also modern, historic and/or significant fabric is very limited and the property is of **low significance**.

Significance of King Street Conservation Area

- 5.15. The significance of King Street Conservation Area is derived from its retained historic layout, which results primarily from a booming and transformative early/mid-19th century development phase. Additionally, surviving high quality listed and locally listed buildings line the streets adding architectural merit and historic streetscapes to create a sense of place. These include the striking St John's Church, inns, and banks, in addition to grand residential properties, some of which have since been converted to commercial uses. Whilst incongruous development and alterations have been made in some places, and the historic New Inn has recently been lost to fire damage, the quality of the built environment as a whole is nevertheless good.
- 5.16. For these reasons, King Street Conservation Area is a designated heritage asset considered to be of **medium-high significance**.



6.0 PROPOSED WORKS AND ASSESSMENT

Current Context

- 6.1. As previously described, the property is currently vacant and semi-ruinous following a fire in May 2022 which destroyed the adjacent listed building, The New Inn, no.1 Milton Road. The roof structure and majority of the first floor of no.2 have burnt down and are open to the elements with damage also caused to the adjacent roof of no.3.
- 6.2. Prior to the fire, the no.2 was in commercial use with the shop premises to the ground floor and storage to the first and second (attic) floors. No.1 was also in commercial use to the ground floor, following closure of the pub in 2016, with two residential flats to the first and second floor.

Proposed Works

- 6.3. It is proposed to convert the first and second floor of no.2 into a two bedroom dwelling. The dwelling is to be accessed from a new door to the ground floor shopfront and partitioned internal stairs. The existing modern shopfront is to be removed and replaced with a more characterful historic style, as seen to no.3, which includes timber stall risers and shop windows.
- 6.4. To create sufficient internal living space, it is proposed to square-off the existing two storey rear addition (which currently has an awkward canted inner face), replace the north elevation first floor window to match existing, and construct a rear dormer to the rebuilt roof. This is to extend from the existing hipped projection and have a half-hipped roof, tile hanging, and an end window.
- 6.5. To the front elevation, it is also proposed to reinstate the correct size and style of timber sash window with glazing bars and a small hipped roof dormer, both as currently seen at no.3 and on historic images of no.2.
- 6.6. To the ground floor, a flat roofed infill extension is proposed to provide storage space for the retained commercial unit with this approach already found at nos.3-6.

Impact

- 6.7. The proposal presents an opportunity to carry out overdue repairs to the historic building and facilitate its optimum viable use, investing in the condition and longevity of the property which may otherwise be at risk of continued disuse and deterioration. Therefore, this would have a **positive impact** to the significance of nos.2-5 as a non-designated heritage asset, to the special interest and setting of the listed building no.1 (albeit that this is currently in ruin also), and to character and appearance of the conservation area.
- 6.8. As the proposal also includes the reinstatement of historic features to the principal elevation such as the timber shopfront and first floor sash window and dormer, further **positive impact and enhancement** to the aforementioned assets is also provided. It is also considered that such works will mitigate any works to the interior, rear, and roof of the property, noting that the fire has destroyed the majority of any historic/significant fabric.
- 6.9. Nevertheless, it is considered that the design of the proposal, including rear dormer, are of high quality and have been informed by an understanding of the character and morphology of the property. The half-hipped style of the dormer will integrate well with the prior hipped style projection, extending its form outwards and maintaining the same ridge height. Due to its position to the rear of the property, the dormer would be minimally visible, if at all, from the conservation area and would cause **no harm or impact** to its character and appearance or that of the property itself.
- 6.10. In summary the proposal is a high quality and well-informed design with regards to heritage matters and will exceed the minimum requirement to **enhancing** the special interest and setting of the adjacent (ruinous) listed building, character and appearance of the conservation area, and significance and condition of the locally listed buildings nos.2-5. Furthermore, as the proposal will include repair and reinstatement works and provide the optimum viable use for the property, assisting its long term conservation and creating a new dwelling, ample mitigation and public benefit are provided to outweigh any possible harm, though none is anticipated.

7.0 CONCLUSION

- 7.1. Paragraph 201 of the NPPF advises Local Planning Authorities that the particular significance, including setting of any heritage asset is assessed. This document has described the heritage assets affected by the proposed works and their significance.
- 7.2. As described in detail in previous sections of this report, the current context of the site is that of properties destroyed by fire with no.2 having lost its roof and much of its first floor and the adjacent listed building, no.1 Milton Road, the former New Inn pub, lost entirely. The properties have remained in ruin since May 2022 and the current proposal presents a viable opportunity to commence repair works. Upon assessment, it is identified that the proposal exceeds basic rebuild and will in fact reinstate historic features such as a timber shopfront, front dormer, and correct fenestration. This will have a **positive impact** to the local listed building no.2 itself (plus nos.3-5), the setting and special interest of the listed buildings (no.1 and those on the other side of the street), and the character and appearance of King Street Conservation Area.
- 7.3. The proposed rear dormer, ground floor infill extension, and other internal and external alterations are also considered to be well informed by heritage matters and subsequently are of high quality and appropriate design. By facilitating the creation of a new dwelling, conservation of an asset, revitalisation of a commercial unit, and reinstatement of features with historic context, it is considered that ample public benefit is provided. In turn, this would be sufficient to offset any level of less than substantial harm to the designated assets, as required by paragraphs 205-208 of the NPPF – however it is concluded that **no harm** will be caused.
- 7.4. With regards to the development meeting the statutory test provided by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is to preserve the setting; building; features of special architectural or historic interest of listed buildings. As the above, it is concluded that the works will exceed this test and **enhance** the special interest and setting of the adjacent, ruinous listed building.
- 7.5. With regards to the development meeting the statutory test provided by 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is for works to preserve the character or appearance of a conservation area. As previously discussed, the reinstatement of a traditional shopfront, correct fenestration type, and general repair works to the property will **enhance** the character and appearance of King Street Conservation Area.



- 7.6. It should be remembered that Historic England defines preservation in this context as not harming interest in the heritage asset as opposed to keeping it utterly unchanged.
- 7.7. In regard to local policies CS20, TC2, and TC3, as discussed above, the proposal has a positive impact to the significance, character, and appearance of the heritage assets through reinstatement of historic features and the high quality and appropriateness of design, resulting from the high regard given to the assets during the design process.
- 7.8. In conclusion, the proposed first and second floor conversion and associated internal and external works meet the requirements of the Planning (Listed Buildings and Conservation Area) Act 1990, the NPPF and local planning policies. It is therefore, requested that the planning application be approved.



8.0 SOURCES

Ministry of Housing, Communities & Local Government (2023), *National Planning Policy Framework*.

Planning (Listed Buildings and Conservation Area) Act 1990

Ordnance Survey Maps (various dates)

Ministry of Housing, Communities & Local Government (2018) <http://planning.guidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment> / National Planning Policy Framework (NPPF 2019 revision) / National Planning Policy Guidance (NPPG 2019) / National Design Guide (2019)

Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Second Edition)*

Historic England (2008) *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Historic England Advice Note 10 on Listed Buildings and Curtilage (2018)

Google Earth

British History Online

Mapping Kent

Old Maps Online

Dover Kent Archives

Kent Online

King Street Conservation Area Character Appraisal (2009)

Gravesham Local Plan Core Strategy (2014)

Gravesham Local Plan First Review (1994) - Saved Policies (2014)



HS1

Listing Descriptions

Heritage Category	Listed Building
Listed Building Name	THE NEW INN
Address	THE NEW INN, 1, MILTON ROAD
List Entry Number	1341483
Grade	II
Date First Listed	03 July 1975
Date Amended	N/A
District	Gravesham (District Authority)
Parish	Non Civil Parish
National Grid Reference	TQ 64889 74127

Listing Description

1. 5277 MILTON ROAD (North East Side) No 1 (The New Inn) TQ 6474 SE 1/120

II GV

2. C18. Corner building. 2 storeys. 1st floor painted brick. Tiled roof with 2 modern gabled dormers. Coved eaves cornice. 3 sashes with verticals only in moulded architraves. C19 bar front with pilasters. 3 sashes to Queen Street elevation.

Nos 1 to 5 (consec) form a group. (Nos 2 to 5 (consec) are local interest buildings.

Heritage Category	Listed Building
Listed Building Name	ROMAN CATHOLIC CHURCH OF ST JOHN THE EVANGELIST. SCHOOL ADJOINING THE ROMAN CATHOLIC CHURCH OF ST JOHN THE EVANGELIST TO THE NORTH WEST
Address	ROMAN CATHOLIC CHURCH OF ST JOHN THE EVANGELIST. SCHOOL ADJOINING THE ROMAN CATHOLIC CHURCH OF ST JOHN THE EVANGELIST TO THE NORTH WEST, MILTON ROAD
List Entry Number	1089027
Grade	II
Date First Listed	03 July 1975
Date Amended	N/A
District	Gravesham (District Authority)
Parish	Non Civil Parish
National Grid Reference	TQ 64900 74073

Listing Description

1. 5277 MILTON ROAD (South West Side)

Roman Catholic Church of St John the Evangelist. School adjoining the Roman Catholic Church of St John the Evangelist to the north east. TQ 6474 SE 1/127

II GV

2. Built as an Anglican church in 1834 and changed to Catholic use in 1851. Built of stock brick with stone dressings. Canted apse. Nave and aisles. Buttresses. Tall stock brick tower with saddleback roof added in 1872-3 by Goldie and Child. Statue of the Virgin Mary in niche. 6 bay nave with double lancets having quatrefoil motif. Slender cast iron columns to interior.

Nos 153 to 158 (consec), the Roman Catholic Church of St John the Evangelist and School adjoining form a group. (Nos 154 to 156 (consec) are local interest buildings).



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