

THE CUSTOM HOUSE, THE TERRACE, GRAVESEND, KENT
HERITAGE STATEMENT IN SUPPORT OF APPLICATION TO AMEND CONSENTED
RESIDENTIAL SCHEME



Charles Wagner Heritage & Planning

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Margravine Gardens London W6 8RL

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SUMMARY

This Heritage Statement has been produced to support the amendments to the consented scheme for the conversion of the Custom House Site, The Terrace, Gravesend DA12 2BB into residential accommodation. The Custom House dates from 1815 and though there have been alterations and additions to the site, there is much of historic interest which the proposals will retain. Little has been previously established on the understanding of the building, either as archaeological or historical reports. An understanding of this complex site is set out so the buildings significance could be understood. This has then allowed an informed assessment of the impact of the proposals on the significance of the listed building and that of Riverside Conservation Area. This understanding has been invaluable in informing the amendments that the potential occupier of the site has requested and demonstrating that they will not cause damage to historic fabric.

1. INTRODUCTION

I was reappointed by Mile Property Group Ltd to provide additional heritage advice on the Custom House site on The Terrace in Gravesend, for a new application to slightly amend the approved comprehensive scheme to convert the listed building and its curtilage buildings into residential use, Ref: 2021/0757 & 0758. The revised proposals alter the position of some partitions in the main listed building but not in the more important rooms of greater heritage significance, and make some similar changes to the rear north wing of lesser heritage significance, adding two conservation rooflights to a curtilage building to a new residential block on the west boundary.

This report should be read in conjunction with the drawings of Turner, Jackson + Day Associates and the planning report of Barron Edwards Ltd, as well as reports submitted by Mile Property Group Ltd.

BACKGROUND

The Custom House appears to have been built by the King's Office of Works in 1815-16 for both Customs and Excise Officers. It replaced what is now Whitehall Place, on the other side of The Terrace, which was built as the first purpose built offices and accommodation for Custom Officers in Gravesend in 1780-2.

The Custom House was Grade II listed in 1975 when the revised survey of listed buildings in Gravesend was issued, and is situated in the Riverside Conservation Area (designated in 1980).

It ceased to be used by HMRC in 2018 after a strategic review of their properties led to a relocation to more suitable premises. Since then it has remained unoccupied despite extensive marketing for various uses as set out in the marketing report submitted with the application. Mile Property Group Ltd bought the site at the end of 2020.

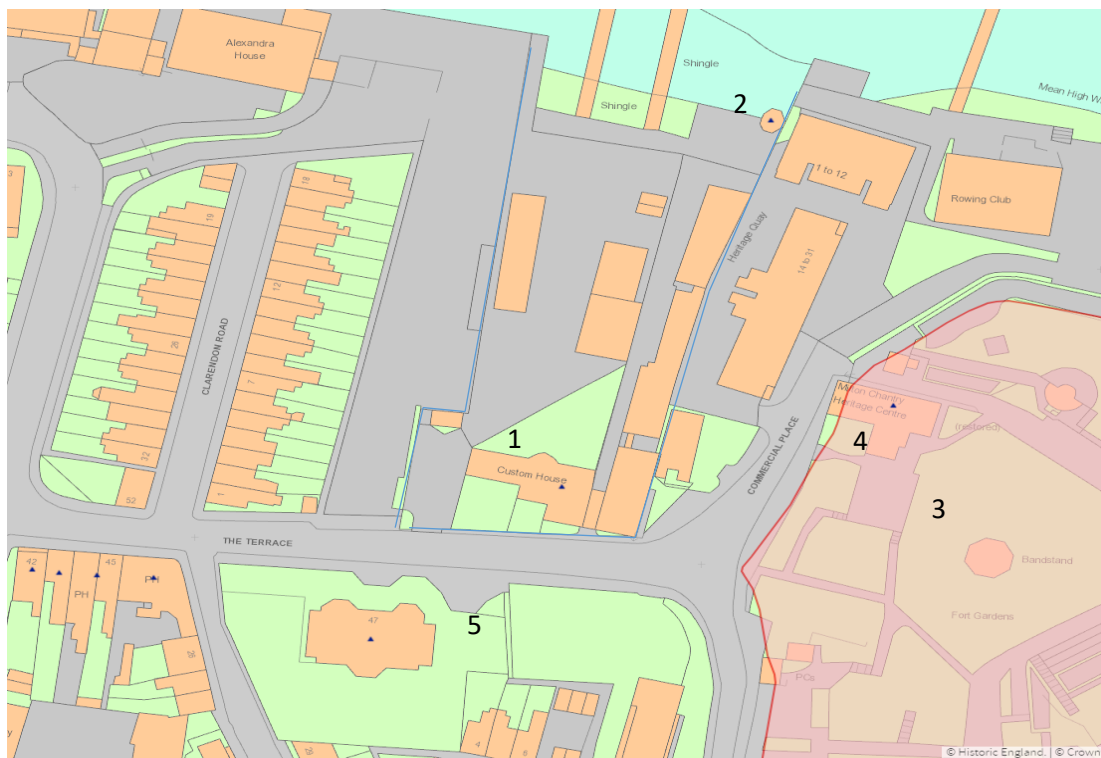


Fig 1 Site location: site edge marked with blue lines, listed buildings with blue dots, the scheduled site red. The identified heritage assets: 1 The Custom House, 2 The Gazebo, 3 Scheduled New Tavern Fort, 4 Milton Chantry, 5 Whitehall Place.

Approved applications ref 2010/0757 & 0758 and reasons for new application

In March 2020 The Mile Property Group had pre-application discussions with Gravesham DC on their proposals for residential conversion of the buildings and a new build element including potential extension to the outbuildings with the council's detailed response issued in May 2020. There have also been exchanges with Historic England and the Gravesham Conservation Officer about proposals for the site. These responses and further site investigation were used to develop the present scheme, submitted for planning permission and listed building consent in summer 2021. Subsequent discussions with the council in 2022 and 2023 resulted in some small amendments to the scheme which this revised heritage statement covers. The applications were given consent in December 2023.

Repeating the content of the previous Heritage Statement of September 2021

This Heritage Statement is a revision of the previous Heritage Statement and much of the text is repeated from that statement up to and including Section 4. Sections 5 and 6 cover the amendments that are the subject of this application.

REPORT AUTHOR

This Report was written by Charles Wagner BSc, DipTP, MA, MRTPI, IHBC, FSA, SPAB Scholar.

Charles Wagner is an independent heritage consultant having left English Heritage after 30 years in 2015 having worked in various capacities. He is a chartered town planner, IHBC member, Fellow of the Society of Antiquaries, a SPAB Scholar, Past Vice-chair of the SPAB and Past President of ASCHB.

He knows this part of Gravesend well as he worked with Crowther Associates on Cox House (Grade II), now Whitehall Place to produce a heritage statement to show an understanding of this building as the first building for the Customs Officers, and support an application for its conversion to residential use which was granted although it has not been implemented. With Crowther Associates he has worked on a number of projects, particularly Whitehall Place (as Cox House) and Kings House in Hove, a residential conversion of a Grade II listed terrace on the seafront in Hove, E Sussex.

2. IDENTIFICATION OF HERITAGE ASSETS POTENTIALLY AFFECTED

2.1 Paragraph 199 of NPPF

Paragraph 199 of the NPPF 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....”*

2.2 Identified Heritage Assets

2.2.1 Designated Heritage Assets

Listed Buildings

1. HM CUSTOMS AND IMMIGRATION OFFICE, THE TERRACE. Grade: II, List UID: 1088999
2. GAZEBO IN GROUNDS OF HM CUSTOMS AND IMMIGRATION OFFICE. Grade: II. List UID: 1341511

Conservation Area

The Gravesend Riverside Conservation Area was designated on 18th December 1980 by Gravesham Borough Council. It was extended on 14th February 2001. The Conservation Area’s boundary includes the Thames riverfront from the Port of London Authority buildings in the west to the entrance to the Canal Basin in the east. It also contains the historic residential streets of Royal Pier Road, The Terrace (part), Clarendon Road, Commercial Place and Canal Road (part), as well as the large New Tavern Fort and Gordon Recreation Ground.

2.2.2 Non-Designated Heritage Asset

There are no non-designated heritage assets - locally listed buildings that could potentially be affected by the proposed development at the back of the site.

2.3 Scoped Out Heritage Assets

Outside the Site’s boundary and within the identified surrounding area are other heritage assets of varying significance and designations. Having borne in mind Historic England’s Historic Environment Good Practice Advice in Planning Note 3—The Setting of Heritage Assets (2017), the heritage assets listed below are considered sufficiently unlikely to experience any effects to their heritage significance (whether visual, experiential or other) from proposed scheme, that they have therefore been scoped out from our Heritage Statement:

3. New Tavern Fort, Gravesend, including Milton Chantry. Scheduled Monument. List UID: 1013658
4. MILTON CHANTRY, COMMERCIAL PLACE. Grade: II*. List UID: 1089047
5. WHITEHALL PLACE, 47 THE TERRACE. Grade: II. List UID: 1089006.

Designated heritage assets marked on the site plan on page 1 above.

3. UNDERSTANDING

3.1 History of Gravesend

Gravesend can be dated back to an Iron Age settlement at Springhead 2 miles to the south west. This became the Roman settlement of Vagniacae, where extensive Roman remains have been found, lying on Watling Street, the Roman road connecting London to the Kent coast. Gravesend on the river was settled by the Saxons, and the Domesday Book recorded mills, hythes, and fisheries here.

Gravesend has one of the oldest surviving markets in the country. Its earliest charter dates from 1268, with town status being granted to the two parishes of Gravesend and Milton by King Henry III in its Charter of Incorporation of that year. In 1380, during the Hundred Years' War, Gravesend suffered being sacked and burned by the Castilian fleet. In 1401, a further Royal Charter was granted, allowing the men of the town to operate boats between London and the town; these became known as the "Long Ferry". It became the preferred form of passage, because of the perils of road travel. Gravesend's importance lay in its being the first main stopping point down the Thames from London.

From the 16th century Gravesend along with Tilbury on the north bank were regarded as ideal positions to defend the River Thames from invading fleets. On the river front are the remains of a Tudor fort built as the pair to a similar fort on the north bank at Tilbury, in 1539-43 by command of King Henry VIII. These were fortifications were strengthened in the reign of Charles II after the Dutch navy had sailed up the Thames in 1667. The defences were strengthened again in the late 18th century when New Tavern Fort was built on the river near The Chantry in Milton and The Terrace was laid out between it and the old south wall of the town.

A fire in 1727 destroyed much of the town as most of its buildings were built of timberframe. It took until the early 19th century for it to grow into a modern town. The 1790s saw houses built along The Terrace and Milton Place. The 1830s were a period of greatest civic development with a new town hall, new piers, and a planned development joining up Milton with Gravesend. Below The Terrace a public garden, Terrace Gardens was laid out by JC Loudon and a new planned suburb was proposed for Milton. The Thames and Medway Canal was dug from Gravesend from 1799 only opening at Strood in 1824, and railway arrived in 1845.

The first half of the 19th Century, with the coming of the steamboats and the construction of the piers at Northfleet and Gravesend, saw thousands of day-trippers arrive from London. This was Gravesend and Northfleet's "Golden Age". Business boomed and bathing establishments and pleasure grounds opened up, the most famous of these being Rosherville Gardens, which rivalled the Vauxhall Gardens in London and attracted thousands of visitors. Windmill Hill too became a popular attraction. Even as late as the 1860s records indicate that within a mile stretch of the Gravesend riverside there were no less than 11 taverns or hotels, with a further 13 in High Street and the alleyways behind. There was also a high concentration of coffee houses, dining rooms and tea rooms in this area. When the railways came, the trippers preferred to go further afield in search of their fun, particularly after the sewers of London brought pollution to the river and made "sea bathing" impossible. After this, in the late 19th century, commuters came, London businessmen and their families, who lived in new larger houses on the edge of the town. Then Gravesend became more built up with smaller houses for workers both in industries on the south shore and in the new docks in Tilbury. The opening of Tilbury Docks in 1886 saw Gravesend's river role diminish but provided jobs.

Though troops had been stationed at Gravesend from the late 18th century, a permanent military presence was only established in the town when Milton Barracks opened in 1862. The defences on the River Thames at this point were strengthened in 1865-71 with Lord Kitchener staying in the town to supervise the strengthening of the New Tavern Battery, East Tilbury Castle, Coalhouse and Cliffe forts. The role of Gravesend and Tilbury in the First World War was important and the fortifications were upgraded and floating bridge was built between the two, allowing a land link and stopping possibility of German boats or submarines making their way up the river.

Being located opposite Tilbury docks meant that Gravesend suffered heavy bombing in the Second World War, and its revival after the war saw the clearance of many old buildings. From 1970 its heritage started to be recognised with the designation of the High Street Conservation Area. There are now eight conservation areas in the town centre. The Terrace north side is in the Riverside Conservation Area, while the south side at its east end, including Whitehall Place, is in the Milton Place Conservation Area. The relisting survey for Gravesend took place in 1974-5 and the new list was issued on 3 July 1975. Since then other buildings have been added to the list. The town has had several heritage-led regeneration schemes.

3.2 History of Customs & Excise and the Office of Works in Gravesend

A Custom House was proposed for Gravesend from 1649 to house the Tide Waiters of the Customs Service who waited on the river on the incoming tide to stop and board all ships sailing up the River Thames to London to check crew, passengers and cargo. At that time they were using the Inns of the town for their offices, but this was thought to make the Customs officers open to corruption.

The purpose built accommodation building was not constructed in Gravesend until 1780-2, this itself an interesting period when the Office of the King's Works was restructured.

The **Office of the Kings Works** was established in the Royal household in 1378 to oversee the building of the royal castles and residences. The organisation of the office varied; senior posts included Surveyor of the King's Works (1578–1782) and Comptroller of the King's Works (1423–1782). In 1782 these offices were merged into Surveyor-General and Comptroller. The role expanded during the Napoleonic Wars from 1790 to 1815 as many new defences were built. In 1832 it became the Works Department within the Office of Woods, Forests, Land Revenues, Works and Buildings. It was reconstituted as a government department in 1851 and became part of the Ministry of Works in 1940.

From 1761 there were named Architects on the Board. Robert and James Adam held the post from 1761 to 1772. The office also had posts of Secretary, Master Mason and Master Carpenter. Surveyor of the King's Works 1779-1782 was Whitshed Keene, while Comptroller of the King's Works 1769–1782 was William Chambers. The Deputy Surveyor 1780–1782 was Robert Taylor and the Architect of the King's Works 1780–1782 was James Paine. While the Secretary to the Board of Works was 1775–1782 was Kenton Couse, and Paymaster of the Board of Works 1755–1782 was George Augustus Selwyn. From 1782, there was a Surveyor General and Comptroller and this post was held 1782-1796 by Sir William Chambers and then 1796-1815 by James Wyatt.

One of the several architects and surveyors on that list could have designed in 1780-2 the new building for customs officers in Gravesend. The site chosen was on the north side of The Terrace that led from Gravesend town downstream to the newer defences on the New Tavern Fort Chantry site in Milton, all of which the Board of Works was responsible for. Stylistically the building has features in common with the buildings of Robert Taylor and James Paine. Unfortunately, there is no mention of it in the acknowledged standard work *The History of the Kings Works* by Sir Howard Colvin (London: HMSO, (1963 to 1982).

A new Excise House including bonded warehouse with its own wharf was built on the opposite, north side of The Terrace, slightly further east on the site of the 'Fountain Tavern' in 1815-6. Again designed for the Office of the Board of Works, this building is more austere and has some similarities to the designs of James Wyatt.



Fig 2 From the 1835 drawings, the south elevation of the Customs House, showing its austere neo-classical design

In 1812, changes in the law meant that ships no longer had to stop at Gravesend to pick up a customs official. Consequently, the number of customs officers was reduced and they would in time have their offices moved from the 1782 building, known as Whitehall Place, to share a building with the Excise Service. It is recorded that Whitehall Place was then converted into commercial and residential use. The tithe map and apportionment for Milton - by - Gravesend 1850 confirm that both buildings were still in Crown use and the First Series Ordnance Survey 1866 shows the main building as four elements, with a wing of three to the North and one to the South.

The area around the site was influenced in the 19th century by an interesting character called James Wates (1804-1872) who was important this part of Gravesend in the 19th century. He seems to have moved to Gravesend before 1830 and was a carpenter and builder in 1832 but also a licensee of a Commercial Tavern or Public House near the Garrison. In 1839 he had a business known as Wates Hotel, and he seems to have ceased to work as a builder. In 1847 he had moved to Commercial Place

and in 1858 he sold up a "Family Hotel" in Whitehall Place. There is also mention of Wate's Tap, Whitehall Place, a beer house which might also be Fountain's Tap House in Whitehall Place. Fountains Hotel had been on the site of the Custom House, but was rebuilt opposite around 1820 and a first publican is recorded in 1824. It closed as a pub in 1914 and it became a number of houses. It was destroyed by a bomb in WW2.

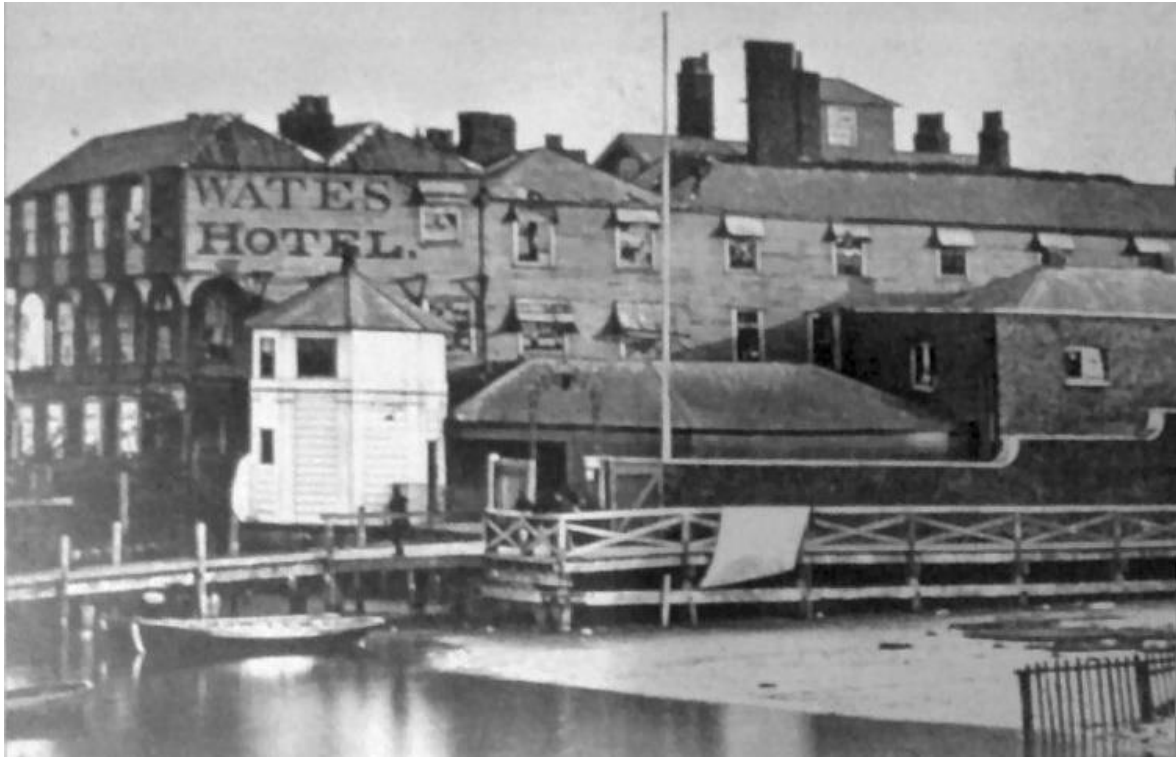


Fig 3 Later 19th century view of Wates Hotel with the Gazebo and latrine block of the Custom House site in the foreground



Fig 4 Fountains Hotel photographed circa 1910



Fig 5 Commercial Hotel photographed circa 1923

As for the other sites owned by Wates, the former Wates Hotel became as Sailor's Home in 1886, taking in the Commercial Hotel. After the First World War, the Gravesend Sea Training School took over the site. It was founded in 1918 following the First World to train boys aged 15/16 to join the Merchant Navy to fill the vacancies of men lost in the war. The older buildings were demolished and the Sea School itself extended to provide facilities for training of young sailors. It moved on in 1963.

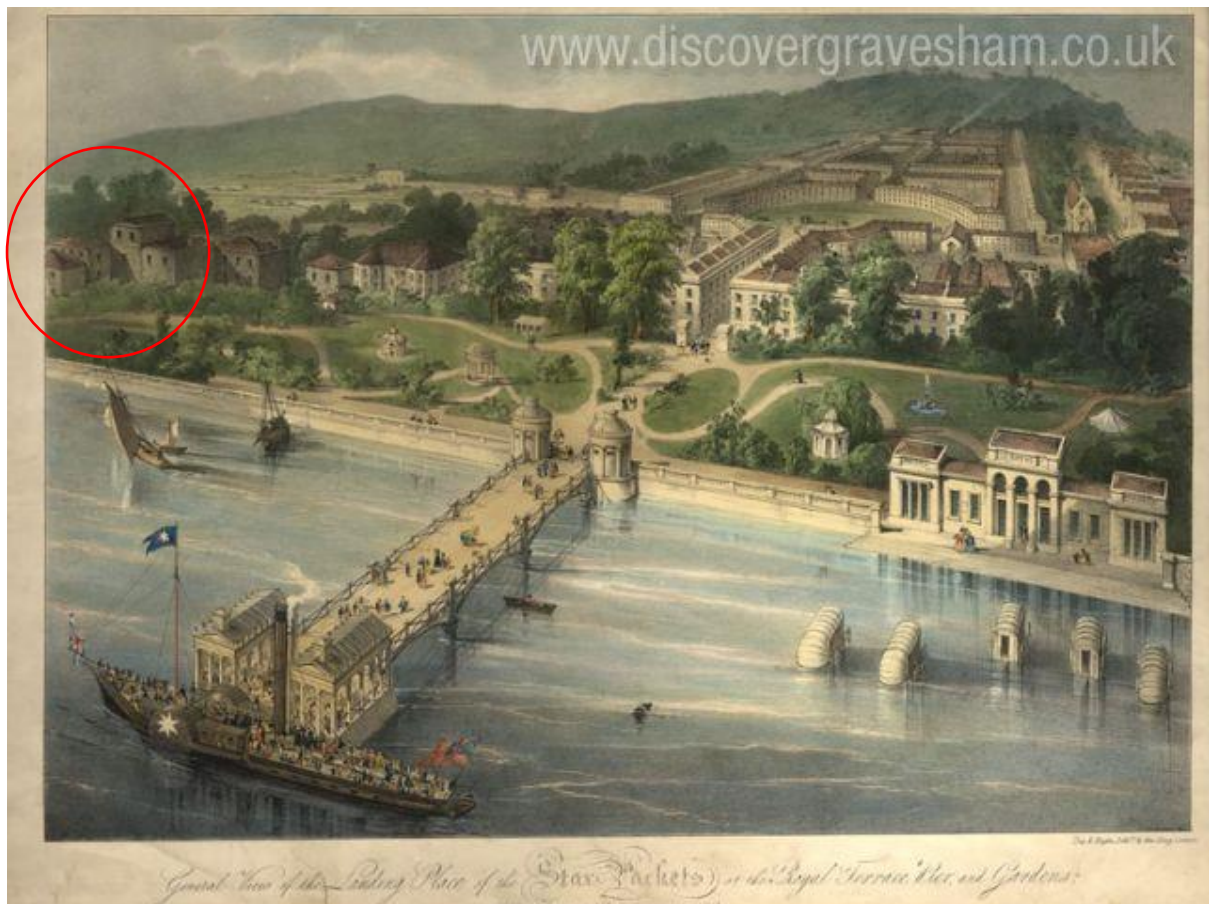


Fig 6 1840s print *General View of the Landing Place of the Steam Packets at the Royal Terrace Pier and Gardens*, the Custom House site circled. On its right is Fountains Hotel, then Whitehall Place with the two canted bays, and in front Terrace Gardens

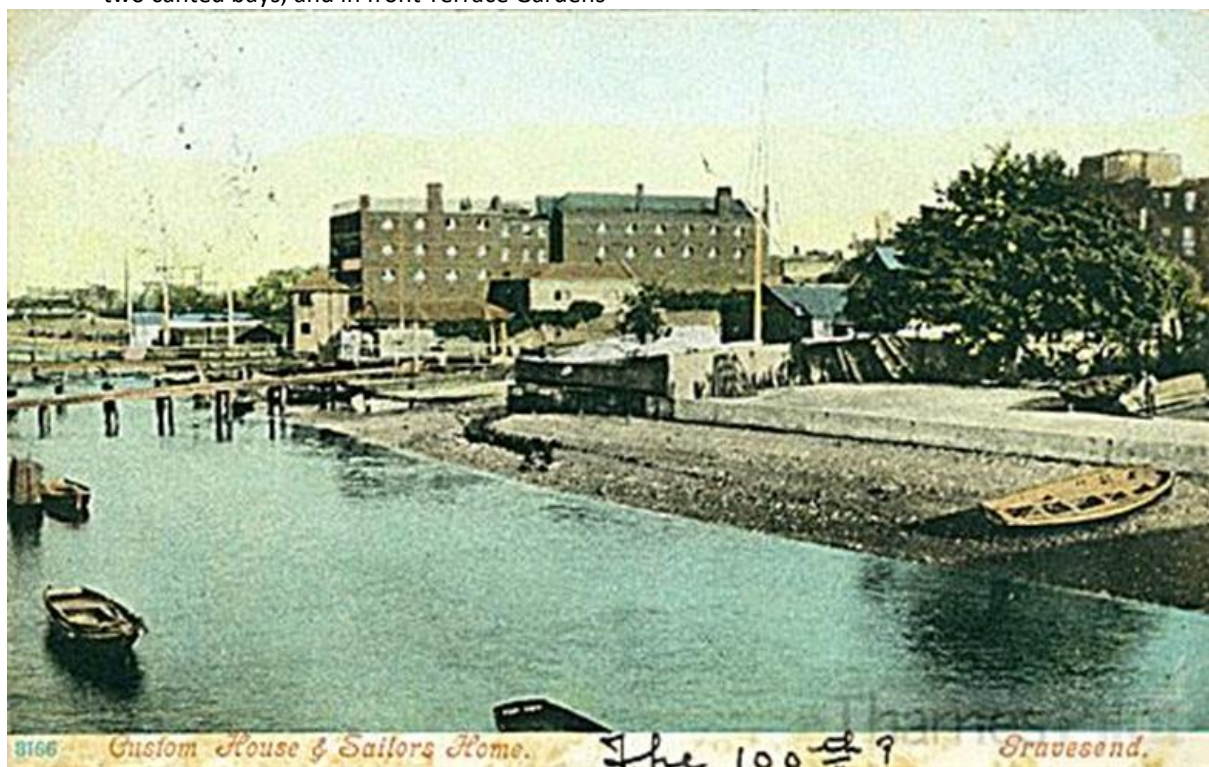


Fig 7 Late 19th century postcard of the Customs House site buildings below the large late 19th century Sailors Home buildings adjacent to the east. The Customs House building is behind the trees with the lookout on the roof to the right of the trees. On the river front the gazebo is prominent.

The Custom House site started in 1815-6 with the frontage building and some of the range leading down to the river with the spine wall separating this eastern part of the site from the main open area north of the Custom House building and there was a 'public passage' between them leading from the large double doors on The Terrace elevation. This is shown on the 1835 plans and the spine wall may have been to separate the Customs and Excise operations.



Fig 8 The Custom House in the late 19th century with the boathouse beside its east boundary and the Fountains Hotel opposite. From the Thames Pilot website.

The Ordnance Survey Maps, the first series 25" to a mile was issued in 1866, show that by the mid century the large open area north of the main building was used as a Baggage Store. On this area the old boathouse had been built, while the diagonal wall had been erected to create a private garden on the north side of the main building, and the Gazebo constructed at the far north of the passage beside the river.

The construction of Tilbury Docks, where Customs & Excise could deal with ships as they docked and The Port of London Authority Act 1908 took away from HM Customs & Excise some of the roles to police shipping entering the River Thames. It is clear by the early 20th century that uses had changed and a 1914 plan in the National Archives shows the main building still housing HM Customs & Excise, but the outbuildings on the east side housing offices dealing with immigration and the Royal Engineers. These changes might be related to the First World War.

Other buildings had appeared by then such as a coastguard station or later boathouse on the north west of the site. This was later extended with offices or accommodation to its south.

The aerial views of the 1920s show the site immediately after the First World War with extra buildings on the yard and in the strip of land to the west



Figs 9 & 10 Aerial Views from the 1920s showing the buildings running down to the river from the rear of the Custom House with the Sailors Home against them and sailors school on Commercial Place. © Britain from Above.



In the Second World War the site had several military uses. A control centre was located in The Observatory, in the third floor semi-circular river-facing observation room on the roof of the Customs House. This was for coordinating the action of the Royal Navy minesweepers charged with keeping the River Thames clear of enemy mines. The Royal Engineers continued to occupy some of the outbuildings and the 1914 and 1925 plans in the National Archives show a secondary access to the site through an opening in the east wall beside the boathouse east of the Custom House, which was used by The St John Ambulance Association.



Fig 11 Drawing by Llwyd Roberts in *Historical Walk Through Gravesend and Northfleet 1935* in Whitehall Place showing it in 1935 with east facing lookout on the roof attached to the chimney and a variety of windows, a brick building to the east and iron railings on brick wall across the frontage.



Fig 12 A matching drawing of the Customs House of the same date owned by D Grierson: a pen and ink drawing by Llwyd Roberts in *Historical Walk Through Gravesend and Northfleet 1935*, partially showing the tops of the buildings on the eastern boundary wall and the low railings in front of the east elevations enclosing the triangular area.



Fig 13 Photograph taken by the National Building Record in 1942 showing the Custom House and the corner of the buildings opposite two years before the V2 rocket landed on Milton Place. Note the low hooped railings in front of the triangular area that is in front of the east elevation. © Historic England Archives NMR records.

Later in the war a V2 rocket landed on Milton Place on 29 November 1944 demolishing all the buildings in the immediate vicinity and killing 8 people. It destroyed all buildings at the north end of Milton Place and east end of The Terrace, such as the former Fountains Hotel. Due to its proximity to the Custom House, damage would have been caused to the front, south elevation building which would have taken the blast, and it may have disturbed the main roof and lookout structure, and the low coach house's roof on the west side.

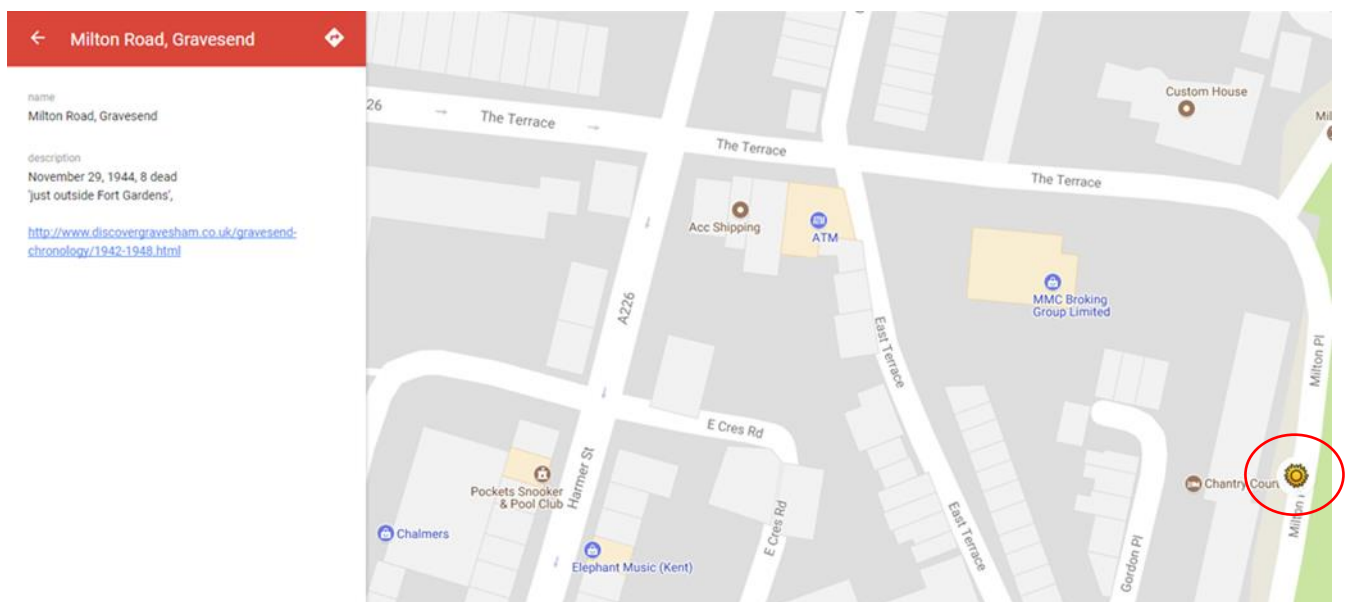


Fig 13 Screen grab from Second World War Bomb sites in Kent map showing the Milton Place V2 of 29 November 1944 when 8 died when a terrace on Milton Place was demolished and the Fountains Hotel on The Terrace badly damaged. On their sites Chantry Court was built with its car park laid out on the site of Fountains Hotel facing the site.

The building clearly suffered damage in the Second World War and the centre of Gravesend lost a large number of residential properties (see map regressions below). The main Custom House building appears to have been sensitively repaired and there are few signs of the bomb damage.

Since the war, the outbuildings leading down to the river have been internally renovated to provide more office space, while a warehouse building was added to the south of the original boathouse, restricting the views from the lower floors of the Custom House. That main building was also refurbished, with fire compartmentalising of the staircases and subdivision of lesser rooms and new openings made. But the main rooms appear to have retained most of their features.

The building was listed grade II in 1975 when the revised survey of listed buildings in Gravesend was issued, and was included in the Riverside Conservation Area when it was designated in 1980. In the recent conservation area appraisal the Custom House was identified as a landmark building.

3.3 Site Evolution Plan

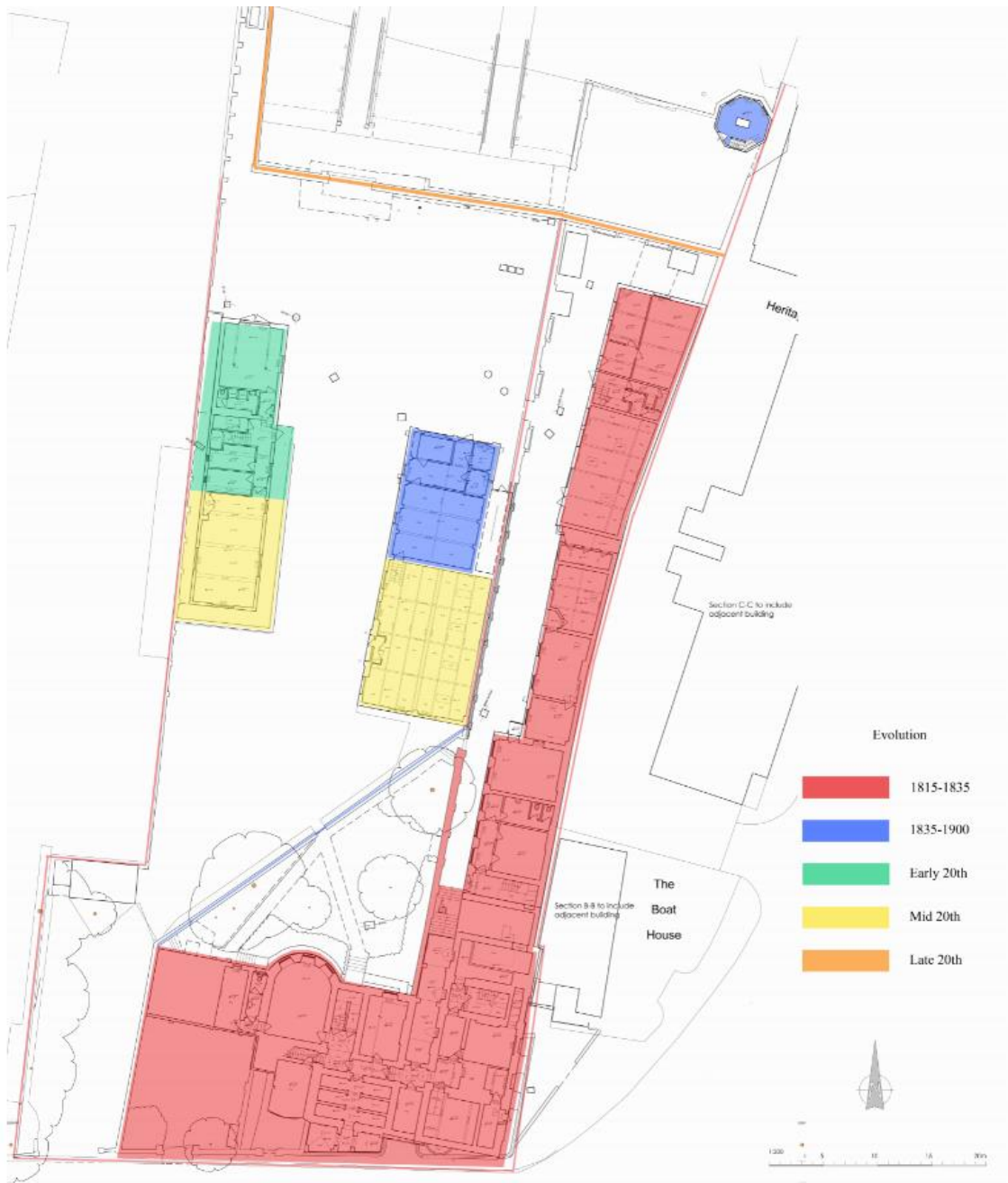


Fig 14 Plan of the site showing the evolution with the buildings on the Customs House site

3.4 Map Regression



Fig 15 1778 *Map of Tilbury Fort Gravesend and parts adjacent* by Thomas Page for King George III. Shows the Terrace laid out as a tree lined walk above the defences and East Terrace laid out. The site for The Custom House is in this military area.

The 1778 Map shows how The Terrace and East Terrace and Milton Terrace had been laid out before the Harmer Street and the riverside gardens, to connect the town to the New Battery Fort.

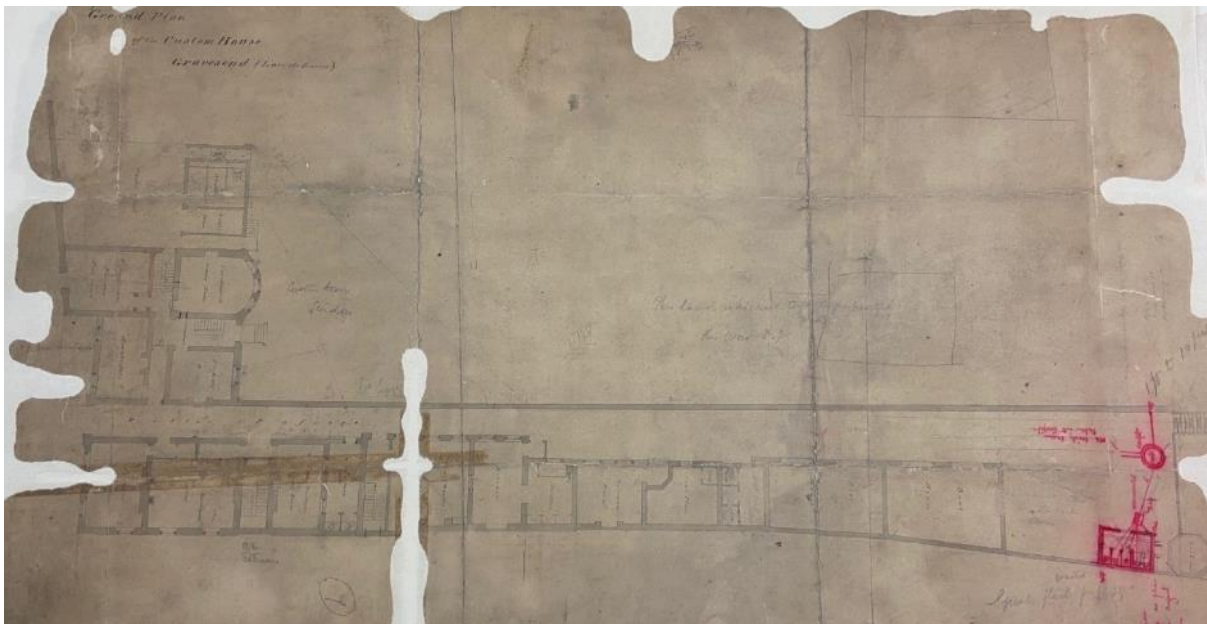


Fig 16 1835 *Ground Plan of the Custom House Gravesend (Late the Excise)* drawn by the Office of Works: shows the buildings on the site as they existed in 1835 showing the Custom House building and the spine wall and service buildings running down to the river. At the riverside (right) there are later alterations to the drawing to show the added Gazebo and latrines.

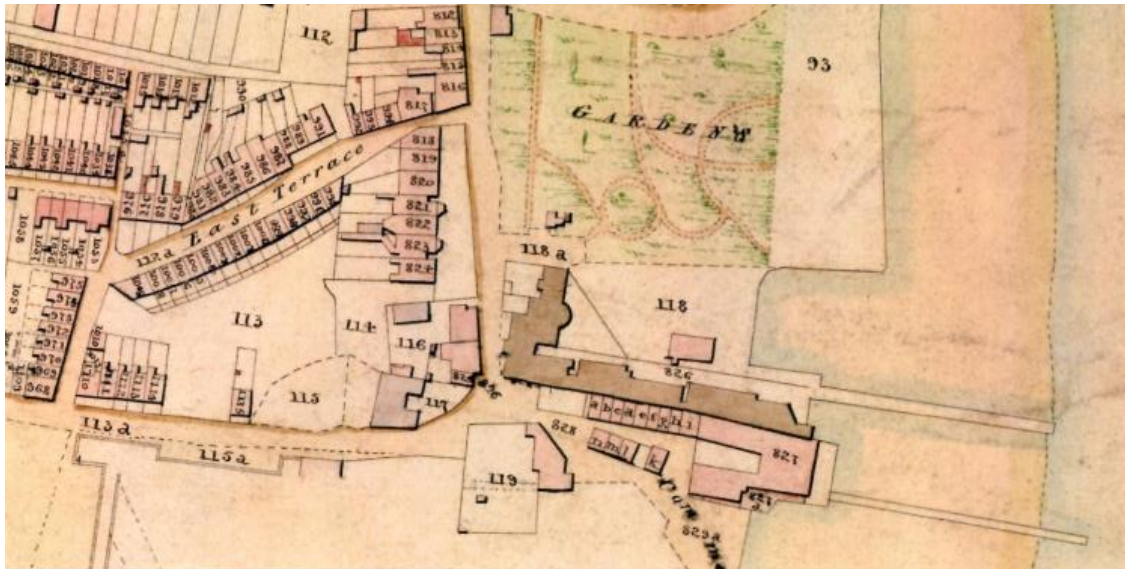


Fig 17 1850 Tithe Map of Milton-by-Gravesend showing the Custom House site with the outbuildings and internal spine wall running down to the river and diagonal wall defining the rear garden with the old boathouse building in the yard to the north. The whole site is given the number 118 and 118a on the tithe map, but the entries are not on the apportionment.

The Tithe Map of 1850 shows much the same layout as that shown on the Ordnance Survey First Series 1866. Both show Whitehall Place as several houses, and the fact that they are not on the Tithe Apportionment as Crown buildings they were exempt for paying the Tithe.



Fig 18 1866 First Series Ordnance Survey showing the 1815 Custom House, with Fountains Hotel opposite and to the west Terrace Gardens, while to the east the site by the river is still called Wate's Hotel. On the site the old boathouse is named 'Baggage Store', while the range of outbuildings behind are marked as 'Mess Room' and 'Store' and 'Baggage Store'.



Fig 19 1907 Ordnance Survey showing the level of infill in Gravesend in the late 19th century. On the site the coastguard station has been constructed near the north west corner. East of the site the Sailors' Home has been constructed on the site of Wate's Hotel with the new Commercial PH east of it, and the Rowing Club on the riverside

There is an 1895 revised map which shows a Coastguard Station constructed in the north west of the site The early 20th century map of Gravesend shows a dense urban environment with the Terrace Gardens built over with Royal Pier Road and Clarendon Road and outbuildings appearing during the First World War in the area between the site and Clarendon Place shown in the 1920s aerial views.



Fig 20 1932 Ordnance Survey Map showing the centre of Gravesend when it was most densely populated.



Fig 21 1952 Ordnance Survey Map showing The Custom House site with added warehouse and around new housing sites

The post-war maps show how this area of Gravesend was redeveloped with much of the terraced housing replaced by flats. On the Custom House site the new warehouse appears.



Fig 22 Map from 1969 showing the Sailors Home/Sea School site to the east cleared with only the old boat store retained.



Fig 23 Map from 1994 showing the Custom House site north of The Terrace much as it is today with the flood defence wall

3.5 Description of the area around the Custom House

The site and area around it is within the Riverside Conservation Area, though 47 The Terrace to the south is in the Milton Place conservation area.

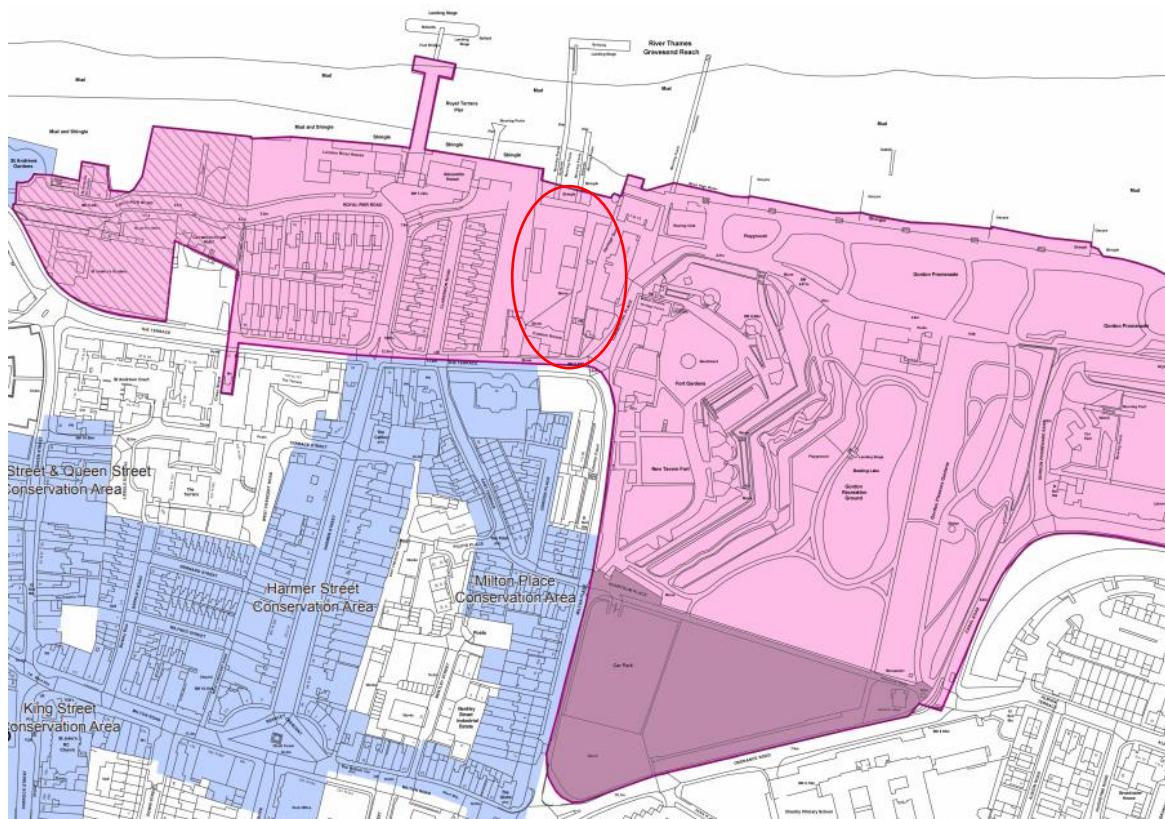


Fig 24 From Riverside CA Appraisal showing conservation area boundaries – Riverside CA in pink with the site ringed in red.

From the Riverside CA Appraisal there is a useful description of the area including the site which is in Character Area 1 along with the riverside going west.

Character Area 1: Royal Pier Road and The Terrace

The Terrace climbs away from Milton Place as it heads west towards Gravesend town centre and there is a visual connection with a view of St George's Parish Church spire. The early 19th century buildings quickly move away from being detached buildings to groups of terraces on short residential roads, such as Clarendon Road.

Royal Pier Road drops down towards the entrance to Royal Terrace Pier and the Port of London Authority buildings before turning sharply to the west on the alignment of the ancient easterly riverside approach to Gravesend... The Port of London Authority buildings have large steel structures projecting from the roof and these tower over the residential properties.

Further east, behind Custom House, large modern apartment blocks are a more recent high density type of housing that began with the 1960s and 1970s blocks such as Chantry Court that stands just outside the Conservation Area.

The principal features of the built form are:

- *Urban riverside character;*
- *Cohesive qualities of two storey terraced buildings, dating from the later 19th century and early 20th century;*
- *Landmark early 19th century Custom House;*
- *Continuous building line on the back of the pavement or behind front gardens;*
- *Mainly a "domestic" scale of building;*
- *Use of red and yellow brick;*
- *Large modern blocks: office and residential uses;*
- *Sash windows, retaining their original glazing pattern and divided into small panes or with central glazing bars, giving a predominantly vertical emphasis.*

The Custom House is described as a 'landmark'. The frontage walls and main Custom House building are prominent in the conservation area, but much of the rest of the site is cut off from the rest of the Riverside Conservation Area. To its east is the 1990s Heritage Quay development which is of the scale of the Sailors Home that was on the site until the 1960s and with its weatherboarded elevations and low pitched slated, hipped roofs it attempts to replicate the Wate's Hotel rather than the brick warehouse appearance of the Sailors Home. It effectively screens the site, apart from the main Custom House building in views from the east and confines its setting. In views from the west on Royal Pier Road before it turns a right angle to run up to The Terrace and Harmer Street, are across the site picking up the lowest range of outbuildings on the east boundary and the Gazebo with the two blocks of Heritage Quay looming above them. The rest of the site is screened by the Clarendon Road houses.

The best views of the Custom House building are looking east along The Terrace and from Commerical Place/the north end of Milton Place where it is the landmark building on the corner.



Fig 25 View from The Terrace west of the site by the junction with East Terrace that show how the main Custom house building stands out and how the planting west of it hides the rest of the site.



Fig 26 View from Commercial Place of the Custom House with the Old Boat Store in front of it and the corner of the Heritage Quay development, while in the background the view is to the backs of the East Terrace houses over The Terrace.

3.6 Description of the Custom House

The Custom House is an unusual building in that it seems to be built in three parts: there is the western block of three grand rooms on top of each other with a staircase and entrance serving them; a central part of the main staircase and series of secondary rooms which from first floor extend over a wide passage (these two elements forming the Commissioner's House) and the eastern range of offices and dormitory accommodation for the lower grades of officer. Looking at the 1835 plans, it would appear that this later part was not originally internally linked to the Commissioner's House save that inside the main doors to the passage there were doors to each side into the Commissioners House and the officers building. On the west side, there is a single storey on raised basement coach house. Both it and the private front entrance to the Commissioners House had wall yards at the front with gates onto The Terrace, whereas the main entrance porch with large double doors to the passage down to the river is at the back of the footway, with railings on either side to lightwells, and though there is no drop kerb and crossover now, there was until the mid 20th century. West of the Coach House there was always an access from The Terrace to the main north yard though the even the earlier maps indicate a large opening with some arrangement of gates.



Fig 27 The Custom House in 2008 in its latter years as HM Customs & Excise offices with the agency's flag flying from the flagpole, showing the unkempt yards at the front and the extensive use of the north yard for parking.

3.7 Exterior

On the south facing elevation the building is 3-storey and 5 bays wide with a central rectangular porch with round arch, inside are flush panelled double doors, and on top of the porch a royal coat of arms in Portland Stone with the word 'Customs' carved on its plinth. Each side 2 6-over-6 sash windows with Portland Stone sills. In front of there are cast iron railings on a Portland Stone plinth to the lightwells. There is a first floor Portland Stone string course and on the first floor 5 6-ver 6 sash windows with Portland Stone sills. Above is a heavy Portland Stone cornice. Hidden behind this is a roof of low pitch slate and lead flats, and the back of the third floor lookout room of brick. To the west set back is the 2 bay wing of the same height that contains the grander rooms. In the angle

where the two parts meet is a Portland Stone porch of two Tuscan columns and pilasters against the wall supporting a heavy stone cornice. The door is 6-panelled with a plain glass semi-circular fanlight above. While the return to the main part has a single window on each floor, the west wing has a pair of blind openings. The raised first floor Portland Stone band carries round onto the west wall as far as the chimneystack. The west wall of this wing has on first and second floor a roundheaded 6-over-6 sash which given light onto the private staircase. On the ground floor there is a round headed door not set directly below the window with 6-panel door and timber fanlight which give access to the coach house yard. There is a half-brick projecting full height chimneystack on the riverside bay of this end wall. The coachhouse is a low building that appears to have been altered since the 1835 drawing and show signs of recent rebuilding. In the last years of HM Customs & Excise occupation this housed a small museum. On its south wall is panelled door then the boarded double doors under a small gable roof, a round headed 6-over-6 sash window and at the west end a roundheaded opening with door recessed inside it. It has a plain west gable with plinths at either end of the gable wall which is raised above the roof surface and has a stone coping. The brick walls to the two yards at the front have plain gatepiers and coping of Portland, a single gate with cast iron overthrow and a double gate to the coach house. This yard as a return brick wall meeting coach house.



Fig 28 View from south west of main elevation of the Custom House, showing the coach house in the foreground with the areas of its front wall showing rebuilding

Custom House north elevation presents a much less uniform, unbalanced elevation, much more functional. It has a full height bay on the west side with 3 sash windows, 6-over-6 on the ground and first floor, 3-over-3 on the second. The ground floor is raised over a lower ground floor which has 3-over-3 sashes. Beside the large bay is the narrower staircase bay, which has a 4-panel door with timber fanlight, and above roundheaded window openings with 6-over-6 sashes.



Fig 29 View from the flood wall to the north, showing the rear elevation with boathouse and former coastguard station in front and in the background Whitehall Place while on the far left the corner of the Heritage Quay development



Figs 30 & 31 The entrance to the main staircase in the centre of the north elevation and the passage to the street entrance

To the east of the door and staircase is a slightly projecting rectangular bay with 6-ver-6 sashes on ground and first floor and a 3-over-6 sash on the second floor. Fitted on the top of this above the cornice and slightly overhanging is lookout room on the third floor with its curved front of 5 full height sash windows. To the east of this, there is a set back, link bay over the ground floor passage from the large double doors. On the ground floor at the back are double doors with flush panels and a fanlight over. Above on each floor are narrow paired double sashes of 4-over-4 with a wide upright

between them. The Portland Stone cornice carries round to the long 3 bay wide east wing, which was built as offices and it is simpler in detail. On the north end of this wing is a 2 storey 1 bay deep part which has alterations on its north elevation of a bridge across to the further wings at first floor level. Above on the higher north wall is an oculus window and where there was a matching window a later chimneystack from the boiler room towards the east corner. This east range also has a number of modern service enclosures on its roof.

The east elevation of the Custom House is 3 bay, 3 storey with similar fenestration except the second floor windows. The Portland Stone cornice carries round onto this elevation and there is a step up in the stone upstand in the centre. Then setback on the north is a blank bay with only a wide door on the ground floor with rectangular fanlight and then the lower bay which is partially hidden by the Old Boat Store but has a 3-over-6 sash on its first floor and the Portland Stone cornice.

3.8 Interior

The 1835 *Plans of the Custom House, Gravesend (Late the Excise)* in the National Archive are extremely useful in allowing the evolution of the main Custom House Building to be understood.

The lower ground floor, though now with few older details is structurally much as built.

The ground floor of the Custom House has retained its plan form as shown on the plans below. The main changes are that there are new openings between the principal rooms and the staircase and other parts of the building. The principal room is the bow fronted Commissioners Dining Room, which retains in fireplace, skirting, windows and door and plasterwork.

The fine stone cantilevered staircase which rises from the lower ground floor to the second floor has south of its ground floor landing a west-east passage that runs from the private stairs at the west end to a door onto the passage through the building down to the river. The Housekeeper had the street front room, while the other ground floor room facing north appears to have been a Dressing Room.

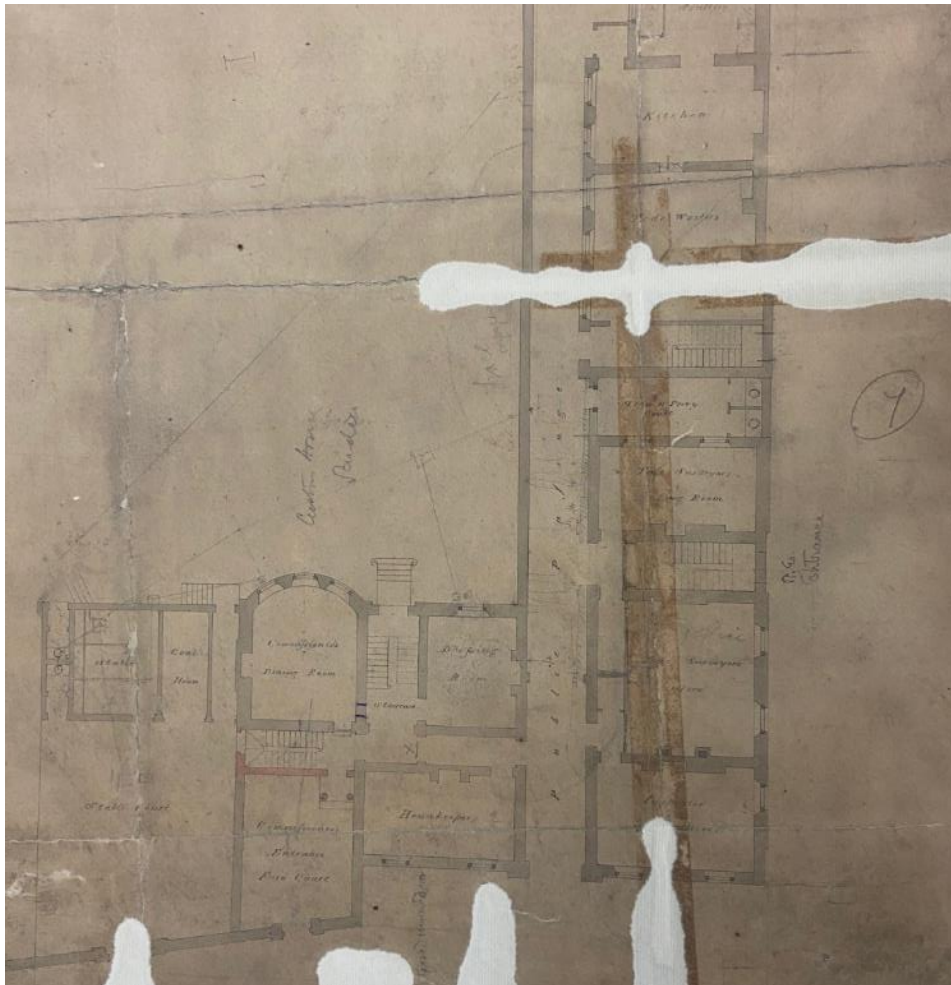
At the west end the Commissioners Entrance and staircase is intact, but the main changes are the blocking in of the doors from the main principal rooms from this staircase, though the openings are still apparent in the rooms.

The first floor plans show a similar level of plan survival and how originally the private rooms, bedrooms were separated from the main staircase. There was originally not an opening to the east wing office use, and there is an opening now there.

On both the first and second floors there is a screen separating the two staircases, and the small pair of rooms on the north over the passage appear to have plumbed lavatories. On the second floor a squint opening links the two parts of the building, though this looks to have been an alteration.

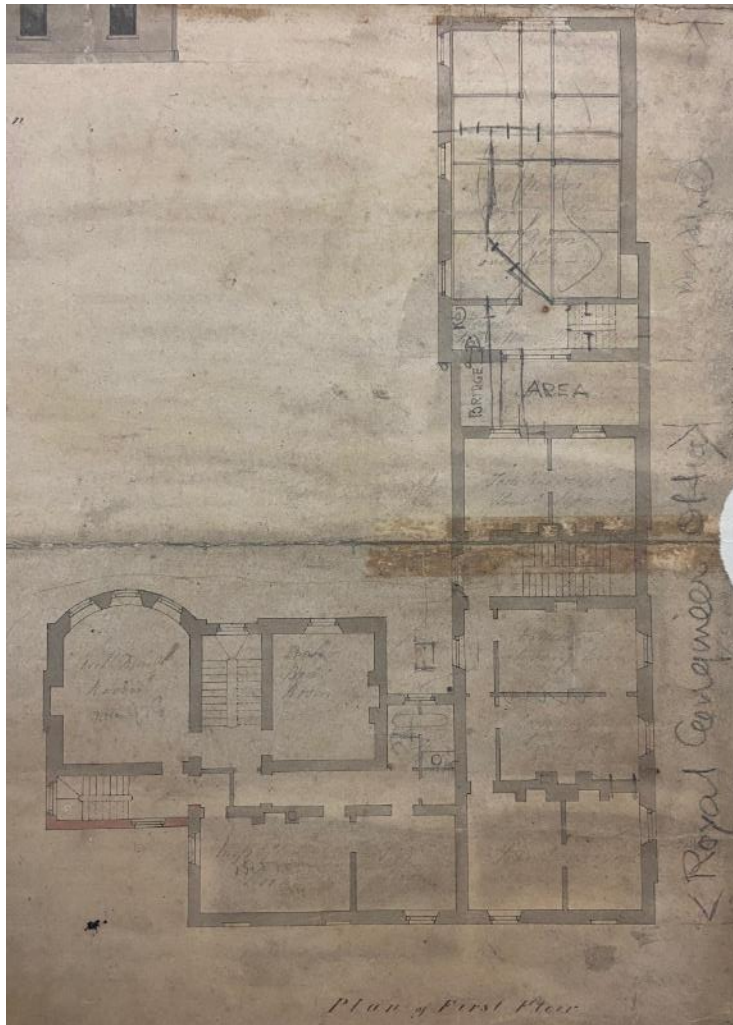
While the staircase up to the third floor 'Observatory' room and the room itself remain hardly changed, save for the replacement of the five full height sash windows with double-glazed units., though retaining in the three central windows the opening panes used to poke a spyglass through for more detailed inspection of passing ships.

The east wing is more altered, not the least because of the insertion of a lift on the north side of the large rectangular chimneybreast on an east-west axis at the back of the south facing rooms. This has had a resulting effect on the room layouts north of it though on the upper floors there is a corridor along the west side leading to a staircase only lit by the oculus window(s).



Figs 32 & 33 Ground floor in 1835 with later alterations overdrawn and the site survey ground floor plan





Figs 34 & 35 Plan of first floor in 1835 with later alterations overdrawn and the site survey first floor plan



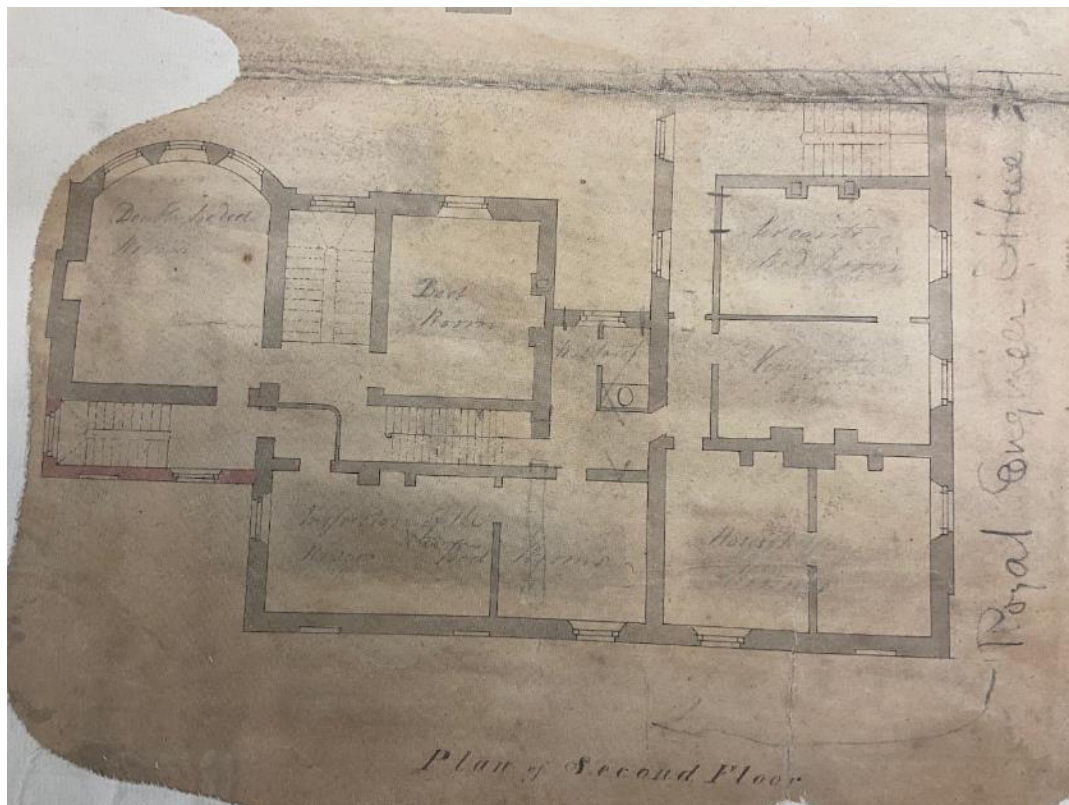


Fig 36 & 37 Plan of second floor in 1835 with later alteration overdrawn and site survey plan of second floor



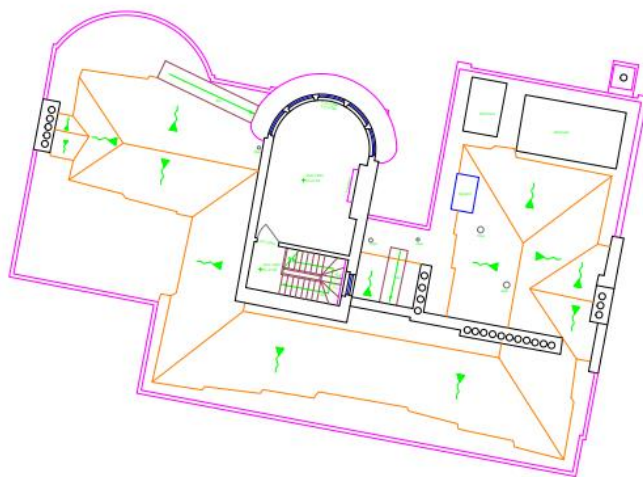


Fig 38 & 39 Plan of third floor in 1835 marked as Observatory and site survey plan of third floor



Figs 40 & 41 Ground floor Commissioners Dining Room showing fireplace and window reveals with fully panelled shutters.



The Custom House contains important surviving features dating from the 1815-35 period, such as the fireplaces and timber details to the window and door openings in the principal rooms and the staircases. There are many other surviving period details that need to be conserved.



Fig 42 First floor landing on main staircase showing cast iron bannister and hardwood handrail, fanlight in archway to east-west corridor and doorcases into rooms off the staircase and landing, and beyond the arch to each side the modern firedoors in the inserted partitions.



Fig 43 Commissioners Private Staircase to the west. Fig 44 Inside of double doors of passage

3.9 Curtilage Buildings

North of the east office wing of the Custom House, there is a small yard, and attached to the east corner, the least boundary wall which forms rear wall of all the curtilage outbuildings going down to the river. Attached to the corner of the central bay of the Custom House, on the other side of the passage, is spine wall, that likewise runs down to the river to contain the passage. The passage itself has flagstones and a series of steps which have been rebuilt in concrete.

The first building is a 3-storey, 6 bay building with a frontage onto the passage that has 6-over-6 sashes on the ground floor, 3-over-3 sash windows on the first floor and 3-pane windows on the upper floor, and a stone string course between floors. This building is linked from its top floor to main Custom House by an early 20th century glazed and timber bridge. The north elevation of the building has wide cambered head windows on the upper floors with a tripartite sash window on the first floor and modern replacement casement window on the top floor.



Fig 45 view of the first range of the outbuildings range running down to the river

Internally this building is now one space on the upper floor except for the staircase in the south end with the Baltic pine roof trusses exposed, and only has added partitions on the other floors. There are no features of note inside this building or the others in the range.

Attached to the north end is a tall 3 bay building with 6-over-6 sashes with a slate roof built against the east boundary wall and then a lower building with 2 doorways, an infill then another with the remains of wide openings that had double doors under painted concrete lintels but now have pairs of 2-light casements, and finally a 2-storey 2 bay building which had similar wide openings under lintels with a pair of doors in one and a pair of 2-light casements in another and segmental windows over with 2-light casements and a brick parapet in front of a hipped slate roof.

These buildings all face onto the spine wall of 3-4m in height built with piers every 3m and topped with a stone coping. This wall has only 2 openings in it, cut into the brickwork and lined with render. This wall is cut off by the modern concrete flood defence wall as it originally went down to the edge of the quay. On the east corner of the quay is the separately listed Gazebo.



Fig 46 View up the passage of the other outbuildings



Fig 47 View of first boathouse with mid 20th century warehouse beyond

In the main yard on the east side but built away from the spine wall is the old boathouse or 'Baggage Store' as it is named on the 1866 map. This is a single storey building with a tall, ridged slate roof. Its southern gable consists of 2 large arches, now infilled with brick panels with a variety of modern windows and a door. Above in the gable is an oculus. On the side elevations are 2 casement windows. Inside the only features are the original roof structure of Baltic pine. Attached to its north end is a mid 20th century undistinguished warehouse building which is at least built of stock bricks and a slate roof.



Fig 48 The former Coastguard station and later offices added to its south end, replacing an earlier small building.

On the west side of the site against the boundary wall is a red brick and tilehung boathouse building, which the maps indicate was built as a coastguard station. The building consists of a brick ground floor which projects beyond the tilehung first floor to form a balcony overlooking the river with white painted handrail and below double doors. On the first floor opening onto the balcony are half-glazed doors with windows either side under a hood on brackets with hipped lead sheet roof. On the east elevation there is a 3-light casement on each floor. At the north end of the roof is a ridge stack which marks the end of the original building and south of this is a taller early 20th century 2-storey, 4 bay building of brick with concrete lintels which has a door in the first bay, two 2-light casements, a 4-light casement in the south bay and three 2-light casements and a 4-light casement on the first floor. This extension appears to have been built as offices, replacing an earlier, smaller range. There are no historic features inside as this building has been refurbished in recent times to make modern offices.

3.10 The Listed Gazebo

The mid 19th century Gazebo now sits outside the flood wall on the corner of the quay and defended from intruders coming from the riverside in front of Heritage Quay by a fierce set of railings. It is described as follows in the listing: *Early C19. A 2 storeyed octagonal weatherboarded gazebo with wooden pilasters, 3 sash windows with glazing bars intact and a simple doorcase. Brick chimney.*

It has a slate roof with lead ridges and a panelled door in the south west face, a small window in the south face and in the north west, north and north east faces on each floor a 5-over-10 sash window. It sits on a brick plinth built up from the foreshore just beyond the edge of the quay. Maps show there used to be a pier running out from this quay.

Its purpose was as a riverside lookout for ship and boat movements on the River Thames. When this use as a lookout ceased is not recorded. However it is clear from research that this is a rare survival of a unique building type.



Figs 49 & 50 The Gazebo in its setting on the quay and viewed through the defensive railings on the east site boundary.



4. SIGNIFICANCE

The Custom House is a Grade II listed building. While the listing recognises the national architectural and historic interest of the building, the official list description does not normally set out what features are important, or to what degree; nor does it describe what elements play a neutral role, or detract from the building's significance. Understanding these aspects is essential in enabling informed decisions to be taken when proposing alterations to the building, so that its special interest can be conserved wherever possible. The purpose of this section is to provide a detailed assessment of significance, so effects of any proposed changes upon the listed building can be fully evaluated.

The following assessment of the building uses English Heritage / Historic England's Conservation Principles (2008), which provides tools for understanding the significance of buildings and places in relation to the following values:

- Evidential (or archaeological) value – the physical aspects of a building that yield evidence about its past.
- Historical value – the extent to which the building is associated with or illustrative of historic events or people.
- Aesthetic (architectural / artistic) value – includes the importance of buildings or places for their design, visual, landscape and architectural qualities.
- Communal value – includes the importance of buildings or places to societies and communities, including for local identity.

This assessment draws upon the historical understanding set out in chapter 2.0 above, and follows established conservation practice in using the following terms:

Higher Significant – original elements which make a notable contribution to the historical and architectural interest of the building.

Significant – original elements which make a strong though secondary contribution to the building's special interest, or later additions which have a notable historic or design value.

Lower Significance – this may include original elements where these are of very modest or greatly diminished value; more often it relates to non-original features which contribute to maintaining the overall building's architectural or historic interest (e.g. replacement windows which replicate the original design).

Neutral or Detracting – features which do not contribute positively to the historic and architectural interest of the building, and in some cases may even detract from an appreciation of its significance. This can include original fabric where it is of minimal special interest, and is located in an area that has undergone notable change.

These terms are used in a purely relative sense within the context of the house, and should not be taken as descriptions of the absolute significance of elements compared to those in other listed buildings.

For this report, the significance of the different elements has been assessed as follows:

The exterior of the Custom House building has for the most part a higher significance in terms of this evidential and historic values as from most elevations it is an unaltered, architect designed early 19th century building and demonstrates the formalisation and expansion of the two Government services. It is an attractive building and has high aesthetic value. It has lower communal value as a private office, though it has certain local importance attached to it as former the Customs & Excise House.

The interior has an unusual plan form which further research may show came from the variety of uses within it. The design with the stacked large rooms for the Commissioner and grand staircase beside, with a central corridor off the staircase landing and the private staircase for the

Commissioner at the west end are all unusual. The survival of most fireplaces, and timber detailing of skirtings, door opening and windows is also important. The interior has higher values of higher evidential and historic and aesthetic values. As a private building the communal values are lower. Significance inside the building does vary according to where alterations have occurred such as with the insertion of the lift and the added chimney in the east wing.

The Gazebo has high historical, evidential and aesthetic values and communal value as highly visible.

4.1 Significance Plans

In the plans below the significance of the walls is ranked from high to medium to low and neutral. These are represented in higher (red)), medium (orange) and lower (yellow) and neutral (green). This will help to determine the significance of the building and what alterations are likely to be acceptable in heritage terms.



Fig 51 Lower ground floor and ground floor significance plans

The simpler lower ground floor level with few features and details only merits medium significance whereas the ground floor with its architectural details and fittings is of higher significance though with alterations being picked up as of lower significance and the inserted lift neutral.



Fig 52 & 53 First Floor and Second Floor significance Plans

On the first and second floor there are more alterations of lower significance, especially in the eastern office part of the building.

A significance plan for the third floor indicates that it is all of high importance.

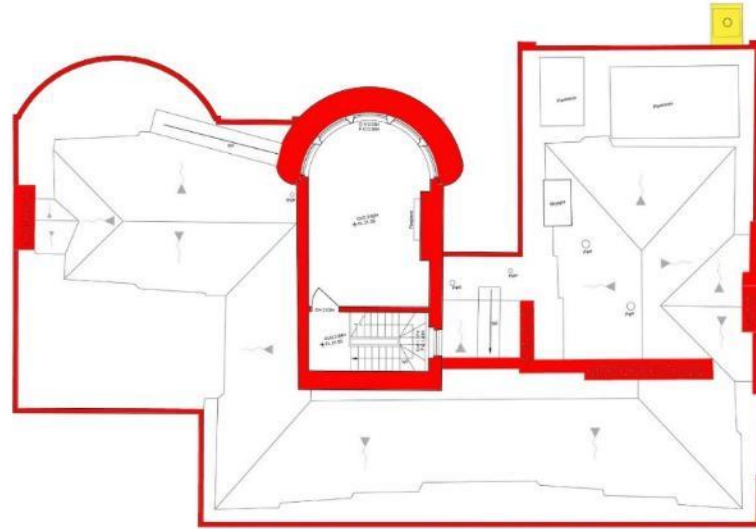
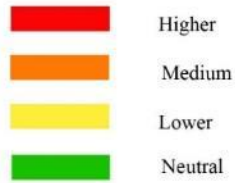


Fig 54 Third floor significance plan

Looking over the buildings that make up the rest of the site, the values of the different elements and the levels of significance vary.

If the main building has the higher historical, evidential and aesthetic values, then the buildings immediately attached to it have medium historical, evidential and aesthetic values: the coach house, the diagonal wall defining the garden, the spine wall and the first outbuilding to the north of the east wing.

The other outbuildings running down to the river and the spine wall are part of the original development but have been altered. The 1835 drawings and maps give clues to their uses but not what they originally looked like, and internally they have been stripped of any historic details. Therefore their values are lesser. The old boathouse and the former coastguard station or newer boathouse have been altered and extended but still have interest as part of the story of the site and therefore merit lower historical, evidential and aesthetic values. The postwar warehouse adds little and therefore has low value. Buildings within the site have little communal value except perhaps to the people of the Customs & Excise who formerly worked there.



Fig 55 Significance Plans for the lower levels whole site, with the addition of blue = negative identified for the flood wall

For the whole site the higher significance is in the levels of the main building above lower ground floor level. The coach house and taller rear east outbuilding, together with the diagonal wall that defines the garden and the southern section of the spine wall are of medium significance. The significance of the other buildings on the site has been assessed as lower except for the postwar workshop which is neutral and the flood wall which is a detractor, though not something that can be changed and will in time need raising. The separately listed Gazebo is an exceptional building on the site which has high significance.

5. ASSESSING PROPOSALS FOR ALTERATIONS AND EXTENSIONS

This section should be read in conjunction with amendment drawings of Turner Jackson + Day Associates.

5.1 The Custom House

General Approach to the conservation and conversion

For the consented scheme the approach taken to the conservation and conversion of the main building was recognising the importance of the main rooms and the important historic features in each of these rooms. The approach developed from understanding the importance of staircases and Commissioner's rooms, Observatory, and maintaining the plan form so it remained understood. Doors and windows, skirting boards, fireplaces and surviving ceilings are retained where possible. All existing windows are to be refurbished and given draught strips and brushes to improve performance. In some cases where they have been partially lost they will be reinstated. For fire separation of the main staircase it is necessary to block some existing doorways onto it, retaining the door on one side and introducing fire resistant boarding on the other. This will then require new openings to be made for doors and these will be carefully created to fit in. Where the staircase landings need new partitions to separate off new apartments these will be installed sensitively and the previous fire separation partitions removed.

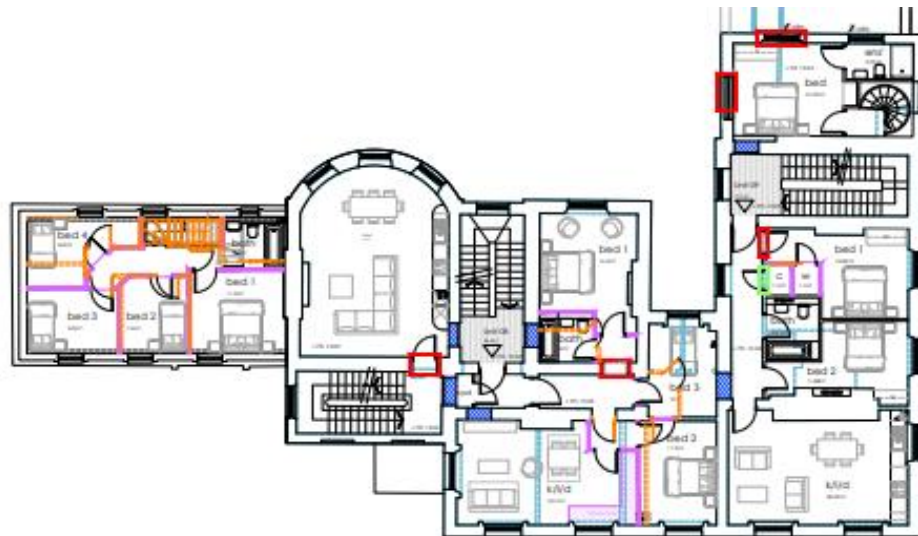
Central and West part

The consented scheme converted the main Custom House building into apartments that retain the important surviving features and ensured that the plan form is still understandable. The 1835 Plans of the building show that some openings which are blocked now, such as those from the Commissioners staircase into the main rooms, could be reopened. The proposal to keep this staircase and the rooms off it as one unit would recreate that historic relationship. The impact of doing this is that these large rooms need to have a 'pod' inserted into two to provide the services and facilities that the apartment needs. However the designs showed how making the 'pod' two-third room height the full volume of the room is retained. The other issue is that the doors from these three rooms onto the main staircase would need to be sealed closed and the decision has been taken that the original doors are retained on the staircase side and on the room side fire resistant boarding would be used to fill the opening. This was to retain the understanding of the plan form and way the building was used.

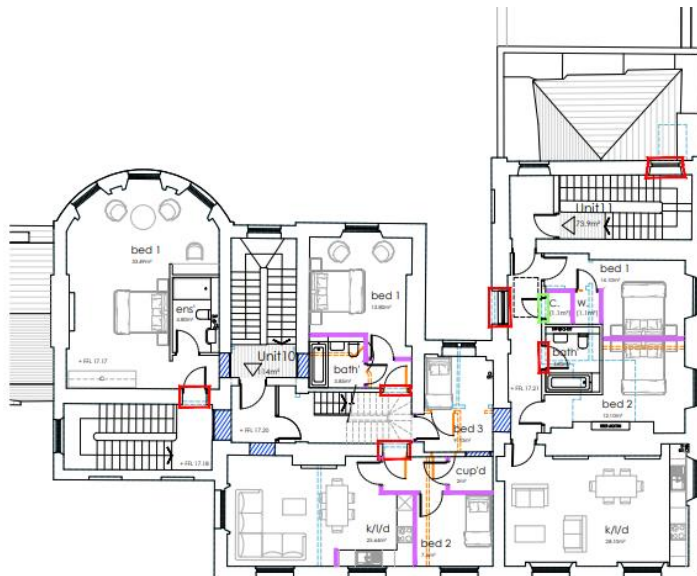
Elsewhere on the other side of the main staircase it proved necessary to similarly seal the doors. These rooms on the north side of the centre of the building had to have new door openings in their south walls and the detailing of these will match the existing doorframes and doors. For the main staircase compartment and the landings off it, there is from the ground floor up existing unsympathetic fire compartmenting which will be removed and more sympathetic partitions installed for new entrance doors to the apartments in the centre of the building.

New changes to the Central & West part

The amendments to the consented scheme in this area are on the first floor to the room to the north side of the corridor and east of the staircase where the partitioned area for the bathroom has been revised. On the south side of the corridor the series of small rooms overlooking The Terrace will be reconfigured differently but in a form that corresponds more closely to the 1835 plan as shown in Fig 34. Similar minor alterations are proposed for the second floor. See Fig 56 below for both floors.



First floor plan



Second floor plan

Legend:

	Consented new opening as per planning consent ref: 20210757 .
	Proposed new opening as part of proposed planning amendments.
	Proposed new walls as part of proposed planning amendments.
	Existing/Approved walls as per consented planning scheme ref: 20210757 are not being amended.
	Wall infill as per consented planning scheme ref: 20210757 .
	Demo as per consented planning scheme ref: 20210757 .
	Approved walls as per consented planning scheme ref: 20210757 which are to change following amendments.

Figure 56 The revised proposals for the first and second floors showing the changes to the layout in purple and green. To the west in the coach house the first floor is a new structure so the changed room layouts have no impact on the heritage.

East wing

The East wing on the other side of the passage was a more altered part of the building and with the removal of the inserted lift there was the opportunity to remodel the layout. However the features that survive in this wing will be retained, such as the paired fireplaces on to north wall of the south front rooms and some built in cupboards where this is possible. The removal of the chimneystack allows the second oculus window to be reinstated allowing better lighting of the stairs, which themselves would be improved by the removal of modern surfacing and the institutional feel of the decoration.

Windows are being reinstated in the north facing elevation of the lower bay on the end of the north wing, which is beyond this staircase. At first floor level the north elevation had two sash windows, the west one of which has been partially lost where the bridge attaches to this building linking it to the upper levels of the first of the outbuilding ranges. Removal of the bridge allows this window to be reinstated, and on the lower level where there is a blind opening at present, a new sash window will be installed. This is necessary to create a separate unit for this part of the building, separated as it is from the rest of the east wing by the staircase.

Amendments to the East Wing

The revised proposals are in the area where the lift is being removed and where there were a series of small rooms created with modern partitions. They consist of minor changes to the location of partitions.

5.2 East Outbuildings and spine wall

The outbuildings north of the east wing offer the opportunity for alteration and extension. The passageway down to the river needs to provide some outdoor space to the apartments in these buildings and yet still needs to be discernible as the route down to the river from the main doorway of the Custom House building. This will be achieved by the use of simply designed railings and planters. Visual link with the river Thames is regarded as important to the understanding of the use of the site in its early years.

Externally these buildings retain some important original rainwater goods in the form of cast lead hopperheads with *G III R* in raised letters in a flowing script and these will be reused.

The first building of three storeys it is intended to divide into two houses, retaining the staircase at the south end for one and creating a new staircase for the other unit. The storm porch will be kept.



Figs 57 Birdseye view of the outbuildings along the eastern boundary and the spine wall in front of them, with the proposed additions to them showing how they fit in to the context. Turner Jackson + Day



Figs 58 Generated view of the East outbuildings with the proposed additions, showing how they blend in their context and how the character of the passageway down to the river inside the spine wall is maintained. Turner Jackson + Day

For the next blocks of buildings, because they are of lower significance, it is proposed to add extensions on top of in a contrasting style but using materials that fit in to the context. This would raise them by 2 storeys and allow a variety of apartment sizes. As curtilage buildings on lower significance and importance, and therefore the change can be justified in heritage terms as having a smaller impact on the significance of the heritage assets, but helping the viability of the whole development that would bring this important listed building into a sustainable use. To convert them into apartments meeting space standards requires the additional space.

Generally the ground floor with its openings onto the passageway will remain unchanged with the windows repaired except where modern windows have been introduced, often replacing large double doors. The final north block, more visible from the river and the conservation area will retain its external appearance and be converted into several units.

Amendments to the proposals for the East Outbuildings

The present amendments as shown on Turner Jackson + Day drawings are for some minor changes to the subdivision of the originally open spaces in the eastern ranges that had had modern partitions and which needed slight adjustments to the layouts for the present client who would take over the site. They will not affect historic fabric.

5.3 The Coach House

This small building on the front elevation beside the Custom House has a small internal area and apart from a stud and brick infill partition and some brick paviour flooring, few internal features. It has been altered and partially rebuilt: its front elevation has an area of rebuilt brickwork and an added roundheaded window, its roof structure also appears renewed. Given these changes, the consented scheme is to remove the roof and add a floor in a gambel roof structure. This is a traditional style with contemporary feel with contextual materials to create a two level unit. The gable at the west end and front and west gable wall is retained. This enlargement changes the appearance of this building, but carefully detailed the change is considered to add interest to this part of the listed building. The front, south elevation will retain its large opening below the pediment with a glazed screen. On the roof will be 3 dormer windows.



Fig 59 View from the south of the Coach House and the new build on the east edge of the site. Turner Jackson + Day

Proposed amendments to the Coach House

To the west of the main building in the coach house, as described above, all the first floor is a new structure so the changed room layouts have no impact on the heritage. The rooms will each have light from one of the dormers in the new roof.

5.4 The Old Boathouse/Workshop

The consented scheme retains the old boathouse and it was to be turned into a useable space with a mezzanine level. While on the outside its appearance will be greatly improved by the reopening of the two large openings facing the river, inside it is necessary to take out some of the original roof trusses to allow for the upper level space. Externally the roof would remain the same except for the

addition of conservation rooflights on the roofslopes. The removal of the modern workshop to the south allows this building to stand out in the centre of the open space in the middle of the site

Amendments to the conversion of the Old Boathouse/workshop

The changes to this building are to add two more conservation rooflights to the western slope, and some interior changes to the new room arrangement inside.

5.5 The Newer Boathouse and new build to its south

The newer boathouse is to be converted into apartments, respecting the northern boathouse end of the building, but accepting the lesser interest of its later southern wing, and its loss of any internal features, so more extensive alterations are acceptable.

South of this building it is proposed to erect a row of new townhouses built against the western boundary. The design of these buildings has been carefully considered so that in their form with a pitched roof and choice of materials they fit the context of the site while been contemporary in design details. Placing a building here has the advantage of enclosing the west side of the site, screening views of the Port of London Authority car park and buildings from the Custom House and increasing the sense of enclosure of the main open area north of the Custom House. The cutback south gable wall of this new building has been carefully detailed to be seen from The Terrace behind the new upper floor of the coach house to create a framing of the entrance to the main yard.

Amendment to new build south of the boathouse

The only amendment here is to add further rooflights onto the western roof slope that looks over the Port of London Authority car park.

6. ASSESSING THE PROPOSALS AGAINST LEGISLATION AND POLICY

In terms of the proposals meeting the requirements of the heritage legislation under the Planning Acts and national and local planning heritage policies, it was necessary to consider if the proposals conserve the listed Custom House and its setting and the listed Gazebo and its setting in a manner appropriate to their significance.

The site is also as an important landmark building in the Riverside Conservation Area in Gravesend, the proposals have to be assessed against the criteria of 'preserving or enhancing the character and appearance' of the area.

The requirement under the Planning (Listed Buildings & Conservation Areas) Act on the planning authority when determining applications for listed building consent and planning permission affecting a listed building have a duty to preserve the special interest of the building and any features that contribute to it (S16 & 66). There is a similar requirement in terms of development in a conservation area (s72).

The site's and buildings' original use has ceased, and with its plan form and extensive outbuildings it is hard to see how other uses for the site could guarantee the sustainable use of the listed buildings and curtilage buildings and their upkeep. Indeed after the site was first sold the original purchasers had discussions with Gravesham BC to explore radical plans that would have seen more extensive demolition of the outbuildings and then the site was remarketed and remained unsold for some months. The residential scheme that was developed and has been consented is a sensitive approach to giving the site a sustainable new use that preserves and even enhances the significance of its historic buildings and the character of this historic riverside area.

The present proposals are minor, non-material amendments that will not have the significance or character.

The National Planning Policy Framework (NPPF Dec 2023) sets out in paragraph 203 that

In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

The consented scheme delivers viable uses for the buildings on the site as well as helping to make a sustainable community at north east corner of Gravesend town centre with an element of new development that would enhance the setting of the listed buildings and conservation area. That the site is now to be taken on by a charity for social housing adds to the benefits of the scheme.

The amendments do not take away from what the scheme will deliver in terms of preserving the heritage of the site.

Custom House

The subdivision of the Custom House into several apartments posed some difficult details to resolve and only where absolutely necessary historic fabric has to be altered. There are no historic features that will be lost, where there is intervention, by way of new doors in the historic fabric this has been kept to a minimum. There are changes that will allow better understanding of the significance of several parts of the building.

The layout of the apartments means that there will be some intervention on each floor but the plan form will remain clearly readable. The logic of the approach is to ensure that the principal feature of the main staircase is retained without subdivision, and where new walls are needed they are along the line of the central east-west corridor. The doors from the main rooms onto this staircase will be retained in situ and sealed. The main Commissioner's Rooms being retained with their staircase as one unit will maintain the understanding of their original related uses. Other rooms of the staircase in the centre of the building will require new openings onto the east-west corridor. This is considered acceptable as the primacy of the staircase is maintained and the walls in the rooms only have a skirtingboard that will need to be cut, while the new doors and doorcases will be in keeping.

In the eastern wing where there have been more changes with the insertion of a lift, there would be more changes, but still opportunities to reinstate some features, such as fireplaces.

In granting consent for the approved scheme, the potential impacts as set out in NPPF paragraphs 203-208, were weighed against the public benefits and the conclusion was that there will be some impact on the designated heritage asset of the conversion, however the level of impact and the amount of harm to historic fabric and therefore the significance of this listed building is 'less than substantial harm', thus paragraph 208 applies. There are heritage benefits in giving the buildings a sustainable new use, and from the removal of recent alterations like the lift and the fire separation of the main staircase, plus care that will be taken to conserve the principal rooms and features. There are also public benefits from creating new residential units in Gravesend town centre. Together these public benefits outweigh the small amount of harm to significance and justify the conversion.

The proposed amendments are relatively minor and have little impact on the historic fabric of the listed building and therefore the overall benefits of the scheme still easily outweigh the small level of harm.

[Curtilage buildings](#)

With the consented scheme considering the treatment of the curtilage outbuildings, those running down towards the river and those in the yard, the changes to their appearance it was accepted would be visible from the north elevation of the Custom House, but adding 1 and 2 storeys to those along the eastern boundary would reduce the impact of Heritage Quay in overlooking the site.

The proposed amendments to the eastern range of buildings are all internal and do not change their external appearance.

The Old Boathouse will externally be returned to much like its original appearance and the addition of conservation rooflights has been accepted on the west roof slope and adding two will make little difference.

The new buildings on the western boundary help enclose the site, screen the views of the Port of London Authority buildings and the additional rooflights on its western elevation will only be visible from the Port of London Authority land.

[Impact on the Riverside Conservation Area](#)

The Custom House has a prominent position on The Terrace in the Riverside conservation area, being the landmark historic building in this character area. The rest of the site behind to the north is screened by it from views in from elsewhere in the conservation area and along The Terrace outside it. As set out above the most obvious changes to the conservation area's character and appearance are the more open and active use of the site as a residential community and the changes to the

appearance of the coach house. The impact on the conservation area of the changes will be small while overall the change of use and the new build elements that will be visible in the conservation area can be judged to be a positive enhancement. Applying NPPF paragraph 208 as any harm is 'less than substantial harm', enhancements outweigh any perceived harm from the alterations to the building.

The only external changes in the amendments are the addition of some extra conservation rooflights to the boathouse and to the far side roof slope of the new build and these will have a non-measurable impact on the conservation area.

Overall Assessment against legislation and policies

Considering the National Planning Policy Framework 2023, the relevant paragraphs to be applied in assessing applications that affect heritage assets are Paragraphs 200-208. This report covers paragraph 200 and hopefully gives Gravesham BC the information needed to inform them in accordance with paragraph 201. The proposals show that the development achieves what is set out in paragraph 203.

The all elements of the development have been assessed and demonstrate that they would cause 'less than substantial harm', and in most cases this would be at the bottom end of the scale of harm. The impact of the changes to the Custom House building itself would require some changes to historic fabric and therefore it is accepted would have an impact on the heritage asset and cause a small amount of harm to its significance, however this would be outweighed by the positives, as some of the changes it can be argued would enhance understanding of the significance.

The proposed amendments would have no measurable impact on the significance of the listed buildings or conservation area.

Any measurable harm to the significance of the heritage assets is at the lower end of 'Less than substantial harm' and therefore paragraph 208 applies. Overall the heritage benefits of the scheme as well as the defined public benefits have been shown to outweigh this small amount of harm.

In relation to the Gravesham Local Plan policies relating to heritage, the proposals would be in accordance with Core Strategy Policy CS20: Heritage and the Historic Environment. The development of the site would conserve the two listed buildings on the site and enhance this part of the Riverside Conservation Area in which it sits, as well as bringing regeneration to this part of Gravesend Town Centre.

The saved policies TC2 and TC3 are met because the proposals would see an important listed building in Gravesend restored and given a sustainable new use. Its setting and that of the listed Gazebo would also be enhanced. In terms of the Riverside Conservation Area and its character and appearance, the analysis of the proposals show that these would be enhanced.

CONCLUSION

The consented proposals by Mile Property Group Ltd, with planning advice from Barron Edwards Ltd and designs by Turner Jackson + Day Associates, represent an opportunity to give the Custom House site a sustainable future in residential use. They conserve the prominent listed buildings of the Custom House itself and the Gazebo, as well as revivifying the townscape at the west end of The Terrace in the Riverside Conservation Area.

The present non-material amendments application is to make some minor internal changes to this scheme as requested by a charity who wish to take on the entire site.

The old, original use of the site ceased in 2018 and a new use has been consented. This new residential use will create a new community in the centre of Gravesend, reviving this part of the town centre and Riverside Conservation Area.

In terms of the historic environment, the main listed building will be sensitively converted to create residential units that maintain understanding of the original plan form, bring the grander rooms together, and allow the main features and details of the building to be appreciated. The more altered eastern wing of the building allows a little more opportunity for change.

While more changes, including new build, are consented for the curtilage buildings, mostly along the east boundary, these buildings will be adapted and extended in a contemporary style which fits the context in terms of form and materials. The new build element on the west boundary would be of similar form and materials to give identity to the site.

The coach house at the side of the Custom House on The Terrace, which has been altered, will have a new build upper floor, in a traditional form and materials of the other additions. Though this is a visible change it has been justified on the grounds of create a useable unit within the walls of the existing building and the new element in design terms relates to the south wall of the new building on the west boundary to create an entrance to the site. The latest proposal is to reconfigure the rooms in this new upper floor.

Other benefits are that the frontage walls and gates onto The Terrace will be repaired. The creation of a landscaped central space in the yard with the old boathouse at its centre will give the residents good open space with views over the flood wall of the river.

These non-material amendments now proposed will not diminish the positive enhancements that the consented scheme was delivering the listed building and conservation area. They would ensure that a new occupier would take on the whole site and give it a sustainable future.

Applying the legislation under the 1990 Act s 16, 66 & 72, the proposals can be judged to preserve the special interest – significance – of the listed buildings and the character and appearance of the conservation area.

In terms of the NPPF, the assessment of the changes show that though there might be a small, impact on the interior from the alterations made to the Custom House on the first and second floors and the remodelling of the curtilage outbuildings, they do not affect the overall significance of the listed building and there are overall benefits from the whole development in the bringing back into a sustainable use all the buildings on the site.

In terms of the Gravesham BC local plan heritage policies, these will all be met by this conservation-led scheme that will revive this important heritage site in Gravesend.

8. APPENDICES

1 SOURCES

Sir Howard Colvin, *The History of the Kings Works*, HMSO, London, 1963 to 1982

DLUHC *National Planning Policy Framework* 2021

Gravesend Historical Society <http://www.ghs.org.uk/>

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Gravesham BC, *Local Plan Core Strategy*, adopted September 2014

Gravesham BC, *Local Plan First Review Adopted November 1994, Saved and Deleted Policies Version from September 2014*

Gravesham BC *Riverside Conservation Area Character Appraisal*, 2009

Historic England, National Heritage List for England online resource

Historic England Historic Environment Good Practice Advice in Planning 2: *Managing Significance in Decision-taking in the Historic Environment* 2015

Historic England HEAN1 *Conservation Area Appraisal, Designation and Management* (2019)

Historic England HEAN2 *Making Changes to Heritage Assets* 2015

Kent Archives and Local History <https://www.kentarchives.org.uk/>

John Newman *Buildings of England: Kent: West Kent and the Weald*, Yale 2013

Llwyd Roberts, *Historical Walk Through Gravesend and Northfleet*, 1935

2. Historic England List Entries

HM CUSTOMS AND IMMIGRATION OFFICE

Overview

Heritage Category: Listed Building. Grade: II. List Entry Number: 1088999. Date first listed: 03-Jul-1975

Statutory Address: HM CUSTOMS AND IMMIGRATION OFFICE, THE TERRACE, GRAVESEND

County: Kent. District: Gravesham (District Authority)

National Grid Reference: TQ 65193 74318

Details

GRAVESEND, THE TERRACE (North Side), HM Customs and Immigration Office. Map: TQ 6514 SW 2/12. Grade: II

1815-16. 3 storeys and 5 windows facing south, 3 windows facing east. Brown stock brick. Stone stringcourse above ground floor. Stone cornice and parapet. Glazing bars intact. Round-headed windows on the 2nd floor of the east front. Doorway on south front with pilasters, projecting cornice with royal Cartouche in stone over and semi-circular fanlight. On the north front facing the river there is a large 5-light bow window on the roof forming a lookout. Facing west there is a 2 bay extension in matching style with blank windows and Tuscan portico. Stone flagged forecourt bounded by spear railings.

GAZEBO IN GROUNDS OF HM CUSTOMS AND IMMIGRATION OFFICE

Overview

Heritage Category: Listed Building. Grade: II. List Entry Number: 1341511. Date first listed: 03-Jul-1975

Statutory Address: GAZEBO IN GROUNDS OF HM CUSTOMS AND IMMIGRATION OFFICE, THE TERRACE, GRAVESEND

County: Kent. District: Gravesham (District Authority)

National Grid Reference: TQ 65229 74402

Details

GRAVESEND, THE TERRACE (North Side), Gazebo in grounds of HM Customs and Immigration Office. Map: TQ 6574 SW 2/12A. Grade: II

Early C19. A 2 storeyed octagonal weatherboarded gazebo with wooden pilasters, 3 sash windows with glazing bars intact and a simple doorcase. Brick chimney.

3. HERITAGE PLANNING LEGISLATION POLICY & GUIDANCE

As the Custom House is a listed building, any proposals which would affect its special interest require Listed Building Consent and consideration will have to be given to the impact of the works on the significance of the building. The proposals are therefore subject to a range of national, regional and local authority heritage policies in addition to normal planning policy, and where relevant these are set out below. As the building is situated in the Gravesend Conservation Area, account has to be taken not only the impact that the proposed changes will have on the building but also in its setting in the conservation area.

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

The relevant Legislation is the Planning (Listed Buildings & Conservation Areas) Act 1990. In particular, Section 16 (2) deals with decisions on listed building consent applications and 66(1) covers the General duty as respects listed buildings in the exercise of planning functions:

(2) In considering whether to grant listed building consent for any works the local planning authority or 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.

66(1) 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.

Thus, any application for works to a listed building should be judged on whether it preserves the special interest of the listed building or its setting.

For the assessing the impact of the extensions on Gravesend Conservation Area, the relevant section is Section 72 (1).

General duty as respects conservation areas in exercise of planning functions.

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Policy

National Planning Policy Framework (2021)

The Government's guidance in relation to conserving and enhancing the historic environment is set out in Chapter 16 of the Framework (Paragraphs 189-208).

Section 16, Conserving and Enhancing the Historic Environment, contains for the following key paragraphs:

"194. 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. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. 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.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly

accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies."

Annex 2: Glossary (Part)

"Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)."

Local Policy

Gravesham Local Plan

Gravesham Local Plan Core Strategy, adopted September 2014 has a strategic objective SO6 Enhance the role of Gravesend town centre as the main location for the borough's retail, leisure, culture and offices, whilst preserving and enhancing its character as a riverside heritage town.

There is also **Core Strategy Policy CS20: Heritage and the Historic Environment**.

5.16.10 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.

5.16.11 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.

5.16.12 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.

There are also saved policies from the Gravesham Local Plan First Review Adopted November 1994, Saved and Deleted Policies Version from September 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. Development Affecting Conservation Areas.*

Policy TC3 Development in Conservation Area *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*

Gravesham are preparing a partial review of the Local Plan Core Strategy, Site Allocations and a Development Management Policies Document, and a Regulation 18 Stage 2 ran for six weeks from 23 October until 31 December 2020. The next iteration has yet to appear. This will be the second document in the Gravesham Local Plan. It will review the current strategic policy on the scale and distribution of development in the Borough (Local Plan Core Strategy Policy CS02). It will set out detailed development management policies to guide decisions on planning applications. Once adopted, it will replace the remaining saved policies in the Gravesham Local Plan First Review, above.