



Historic England

Mr Ethan Bonthron
Gravesham Borough Council
Civic Centre, Windmill Street
Gravesend
Kent
DA12 1AU

Direct Dial: 0207 973 3630

Our ref: P01589561

9 April 2025

Dear Mr Bonthron

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MILTON PLACE CAR PARK GRAVESEND KENT
Application No. 20250167**

Thank you for your letter of 5 March 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

We think the proposal for residential development on the southern edge of Fort Gardens, Gravesend, affects the significance of designated heritage assets (New Tavern Fort, and Milton Place and Riverside Conservation Areas).

We think the proposals would cause less than substantial harm to these designated heritage assets, and advise that further improvements might be made to minimise harm and secure greater heritage benefit in line with the NPPF.

Historic England Advice

Significance

Gravesend Riverside Conservation Area

The Gravesend Riverside Conservation Area, situated at the eastern shore of the town, is primarily significant for its Scheduled fortifications (16th century Gravesend Blockhouse; National Heritage List for England no 1005120, and 18th century New Tavern Fort; NHL no 1013658) and their fields of fire designed into the landscape.

These heritage assets are historically significant in the wider riverscape by working in concurrence with other military assets, including Tilbury Fort, to strategically protect the mouth of the Thames from attack.



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Milton Chantry, Gravesend's oldest building, symbolises the foundation for settlement stands at the heart of the conservation area. To a lesser degree the nineteenth century conversion of the military landscape to recreational use, such as the open space and abundant trees which form General Gordon's park and promenade, and the development of formal townhouse rows, contribute to the conservation area's aesthetic value and tell of its riverine prosperity.

The Conservation Area is important to understanding the time depth of Gravesend and its development from the relationship between people and the river.

Milton Place Conservation Area

The Milton Place Conservation Area lies east of the historic centre and is significant as an early nineteenth century planned development of fine high-quality housing. Architecturally, houses are classical in style with Italianate features, sash windows, and decorative railings. A hierarchy of housing, from grand villas to modest terraces can be appreciated with a tight urban grain interspersed with open space.

The open space east of the conservation area provides an attractive green buffer to the planned development as well contributing to an appreciation of higher status dwellings overlooking the park.

New Tavern Fort

New Tavern Fort is a nationally important scheduled monument and Grade II* listed building; the scheduling includes the site of the 14th century Milton Chantry (also listed Grade II*), alongside earthworks and below ground remains.

New Tavern Fort is an unusually complete example of 18th century fortifications which underwent further development in the 19th and 20th centuries, responding to changes in military threat and strategy, and the evolving surrounding town.

The open space around New Tavern Fort is an important component that contributes to its significance. The larger artillery guns it accommodated were designed to provide long distance fire, particularly along the coast and out to sea, and crossing fire with Tilbury Fort, so consideration of their sightlines and field of fire is important in this regard.

The area immediately around the fort provided an open space that would have ensured a lack of cover for enemy approach, but was not easily defensible, or planned to be so. Close after the fort's construction, this was then seen as a vulnerability, with subsequent enhancements made (c.1795) along the south and west sides, including a brick wall with loopholes for musketry, bastion, and palisade in the ditch. This would be both effective for security and give some defence against localised land assault. The walls closing the southern ditch of the fort were an early, if primitive, example of a





caponier with firing loops positioned to fire along the length of the ditch, emphasising the perceived need for close range defensive capabilities.

The stretches of front earthen ramparts not occupied by gun embrasures, also had fire-steps for the overbank firing of muskets, to reinforce the obstacle of the ditch and its palisade against frontal range assault.

In this regard the fort would have had some defence from ground attack at close range and the open space retained around it contributes to functionality and understanding of its defensive capability.

The effectiveness of these modified defences reduced as the urban development of Gravesend spread towards the rear and flank of the fort from the early nineteenth century. However, in the mid-later 1880s the security of the fort was improved with the erection of a spiked metal 'Dacot' fence in its ditch, supporting the ongoing desire for security and defence to the east and south-east.

A training battery was also added during the reconfiguring of the fort in 1868 with emplacements facing inland to the south/south-east. These were essentially for firing blank practice, but the ability to replicate defensive fire and target spotting, would presumably have made a clear sightline from these emplacements part of their design.

The edges of the defensible open ground to the south and south-east of the fort, gradually became encroached upon; the proposal area was repurposed for a church (c.1845) and school, and in 1930 the whole fort and surrounds were laid out as a pleasure garden for the public including a swimming pool. All these structures were then subsequently demolished in the later 20th century in favour of a return to largely open ground, which fortuitously enables better understanding of the fort within its setting.

Impact

Conservation Areas

The main impact of proposed development within the Gravesend Riverside Conservation Area, and setting of the Milton Place Conservation Area, is from the loss of open green space.

This would harm historic value by eroding an understanding of the space as an informal recreational area following General Gordon's nineteenth century remodelling of the fort into a park. The unity of the green spaces from Ordnance Road as a riverside landscape would be harmed to a modest degree.

Aesthetically, the loss of open and green space would harm the appreciation the soft, green buffer against the contrast of formal terraced housing on Milton Place. The





green space also helps to understand the high status of housing along the west side of Milton Place, which commands views over the space.

Development would block dynamic views of terraced town housing on Milton Place from Ordnance Road. This view enhances the setting of the Milton Place Conservation Area by providing an attractive backdrop to the historic row of houses.

The inclusion of new hard surfaced infrastructure, lighting and domesticating features associated with the proposed housing will to some degree create a suburban appearance in a conservation area primarily defined by green riverside space and town house rows, for these reasons development would harm the character of both conservation areas.

Whilst much of the development's proposed layout is well considered, there are areas that could be better integrated into the Conservation Areas from an urban design perspective.

New Tavern Fort

We think that harm to New Tavern Fort from the proposals would occur from encroachment of built form into the open space to its south, which forms an important contribution to its setting.

Despite a series of historic changes in the immediate area surrounding the fort, we think retaining open space here is important to understanding the reason for construction of the fort in this location, its defensive capability, how it could be operated (including in case of ground based infantry attack), and how it evolved through different phases of military and public amenity use.

Whilst the area to the north of the fort, and east along the river, was the primary focus for long range defence, the inland areas clearly had an important supporting, if gradually diminishing, role in proximal defence.

Construction of new houses and flats in this open space would further erode the open space around the fort that is an important aspect of its setting, making it harder to understand how it was designed and operated, and more difficult to appreciate the open context the fort was purposefully set within.

Policy

Section 16 of the National Planning Policy Framework (NPPF), Conserving and Enhancing the Historic Environment, sets out policies for decisions governing change in the historic environment.

Paragraph 208 notes that: 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.

Paragraph 210: in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 212 requires consideration of 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; scheduled monuments are of national importance). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Para 213 notes 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.

Paragraph 215 requires that less than substantial harm to significance should be weighed against the public (including heritage) benefits of a proposal.

Paragraph 219 notes you should look for opportunities for new development within Conservation Areas, 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

Position

Conservation Areas

In terms of impact on the Milton Place and Riverside Conservation Area, we think the applicant has addressed matters raised through our pre-application advice, but think that a lower level of less than substantial harm remains.

We think that the scheme could go further in terms of better integration of its design and layout into the rich character of both areas to reduce harm in line with paragraph 208 of the NPPF.

We welcome the reduction in hard surface car park, which has a negative impact on the character of the conservation areas, however, the development site as a whole



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has retained large areas of hard surfacing for parking and vehicles. One way to reduce harm might be to consolidate parking into one area or reduce the number of spaces in favour of green space.

Of the proposed development types, the gable fronted houses have the most architectural interest. The rusticated bricks patterning at ground floor level and front gardens along Ordnance Road are particularly attractive and contextual. The development also successfully provides an active frontage to Ordnance Road. To continue the line of this active frontage, we think the '3B6P' houses to the east could connect better to the Ordnance Road facing houses by turning sideways/forming an arc which wraps to the east and faces the 'field of fire' pedestrian cut through.

Uniformity is key to housing in the conservation area, and we also feel that the two blocks facing Khartoum Place '4B7P' house and '2B4P' house would benefit from adopting the same gabled elevation as the neighbouring '3B5P' house as shown in the cross-section elevation A-A. If changed, the roofscape and form of the buildings would integrate better with the houses faced to Ordnance Road. Houses facing Khartoum place would also benefit from front gardens as seen at nearby Milton Place.

The character of the corner block is pared back and contemporary, we think the rusticated ground floor and horizontal brick line add interest but would encourage the design team to go further, for example, by accentuating window and doorway openings with contrasting brick 'architraves' and enlivening the parapet of the building with a textured brick cornice.

We recommend conditions securing high quality design such as recessed windows and doorways, brick samples, eaves and ridge details, soft landscaping details and heritage interpretation.

New Tavern Fort

We think that proposed construction of new buildings in the open space to the south of the fort would be harmful to the Forts significance through development within its setting, and some harm would be likely whatever the configuration of buildings on the proposal site.

We do not therefore agree with the applicant's conclusion (see submitted heritage and planning statements) that the development can be achieved whilst causing no harm to the significance of the Scheduled Monument.

We think the current proposals are in the middle of the range of less than substantial harm (to New Tavern Fort) and therefore encourage you to consider NPPF paragraphs 212 and 213, and the great weight that should be given to the asset's conservation.

The idealistic outcome for this site would be retaining and further enhancing the



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existing public space, and in doing so better addressing heritage concerns. We recognise, however, that previous 19th/20th century uses of this site included buildings that encroached within the forts setting, that there is a desire to regenerate the redundant, derelict, corner plot included in the proposal area, and create affordable housing in Gravesham.

We appreciate that steps have been taken to create lower building heights, lessen density on the eastern half of the site, and maintain a buffer, free from built form in the area closest to the fort, and this has reduced harm in relation to the fort and Conservation Areas, in response to our pre-application advice.

We think the landscape design to the east side of the proposed housing area is creative in how it seeks to interpret the former field of fire to the south and south east of the fort. The reduction in proposed trees in this area and implementation of a lower-level planting scheme, is also beneficial in retaining a sense of openness.

Further comments

Whilst there is some heritage benefit included in the proposal, given the importance of the heritage assets here (the fort is nationally important), we encourage you to consider paragraphs 210 and 219 of the NPPF, and seek to maximise the opportunities for enhancement.

New Tavern Fort for example, would benefit greatly from better investment, landscape management and repair, and interpretation; if this development proposal sought to give clearer benefits for the fort, we think the application would better satisfy the requirements of the NPPF.

Whilst we have previously raised the point that harm might be minimised to all the above mentioned heritage assets by even further reducing the number of dwellings and lowering the height of the corner block of flats, we understand that the viability of the scheme is finely balanced, and will reserve comment on this, subject to your own assessment.

In reaching a decision on this proposal, we encourage you to be satisfied that harm has been avoided and minimised as far as possible, heritage enhancements and opportunities have been maximised, and harm (to the Conservation Areas and New Tavern Fort), which we assess to be less than substantial overall, weighed against the public benefits of this proposal, as described in paragraph 215.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 208,



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210, 212, 213, 215 and 219 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Rebecca Lambert

Inspector of Ancient Monuments

E-mail: rebecca.lambert@HistoricEngland.org.uk



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