



Mrs Amanda Grout
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Direct Dial: 020 7973 3721

Our ref: P01551060

11 November 2022

Dear Mrs Grout

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

**CLARENDON ROYAL HOTEL ROYAL PIER ROAD GRAVESEND KENT DA12 2BE
Application No. 20221076**

Thank you for your letter of 24 October 2022 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.

Historic England Advice

Significance

The site is situated on an existing open space picnic area on Royal Pier Road next to the river Thames within the Riverside Conservation Area in Gravesham. The Riverside Conservation Area encompasses a collection of buildings and spaces which illustrate the continued use of this area and the intimate connection of town to river since the 16th century. Adjacent to the site is the Gravesend Blockhouse Scheduled Ancient Monument.

This part of the Riverside Conservation Area is characterised by its flat topography, with the opening up of the streetscape to public gardens, promenades and grassed areas allowing for extensive views along the river Thames and across to Essex. The site is a long-standing open space which contributes to this character and significance of the conservation area.

Opposite the site is the Grade II listed Royal Clarendon Hotel, which is a positive contributor to the character of the conservation area. It is a grand mid-19th century four storey building designed to capitalise on river views across an open space and still benefits from unobstructed views looking out over the river today.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Impact

The proposals (already implemented) are for a large rectangular marquee comprising of white canvas together with interlocking poles measuring 12m x 30m and 4.1m high, situated within the picnic area. The structure would be used as additional outside function space to assist the operation of the hotel for a 6 month period of the spring/summer over 3 years.

The marquee would be located at the roadside of the area, with its width spanning east to west up to the boundary of the Gravesend Blockhouse.

The location and scale of the marquee would be prominent in views along Royal Pier Road, obstructing views out along the river and from the Royal Clarendon Hotel.

Some harm would be caused to the significance of the conservation area through eroding an understanding of an important open space with the introduction of an unattractive structure which is alien to the conservation areas established historic character of development.

The marquee would also harm, to a limited degree, the appreciation that the Grade II listed Clarendon Hotel was designed to overlook the river and capitalise on views which are enhanced by the open character of the site.

Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on decision makers to have special regard to the desirability of preserving listed buildings, their settings, and any features of special architectural or historic interest which they possess (Sections 16 and 66).

The National Planning Policy Framework (NPPF) 2021 sets out the government's policies for decision-making on planning proposals. The NPPF places great weight on the desirability of sustaining and enhancing the significance of heritage assets and putting them to uses consistent with their conservation. It also emphasises the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 197, a and c).

Paragraph 195 instructs local planning authorities to 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 199 requires that 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. Paragraph 200 requires that any harm to heritage significance should require clear and convincing justification.

Paragraph 202 states that 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.

Position

Historic England note that the marquee was first erected under the Government's scheme to assist the hospitality trade during the Coronavirus pandemic, and we appreciate the benefits of revenue creation that the marquee makes for the hotel.

Historic England have published advice entitled Temporary Structures in Historic Places (2010). We recognise the benefits temporary structures can bring in terms of providing additional space, helping with income generation and, sometimes, offering a temporary solution which has less impact on a site than a permanent building and may reduce the risk to the historic parts of a site. Nevertheless, they are not appropriate in every location and need to be carefully designed and positioned to avoid causing harm.

We note this application has not been supported by a Heritage Statement or other information setting out the significance of the heritage assets affected. We therefore conclude that the application does not meet the requirements of paragraph 194 of the NPPF.

There has been no explanation provided as to why the proposed location in the picnic area is the ideal location within the site or what measures have been considered to avoid or minimise the harm caused by the marquee's presence on site in this location, including exploration of alternative locations, scale and design (either temporary or permanent) which may be less harmful to the designated heritage assets and their settings (in accordance with NPPF paragraph 195).

We consider the proposed marquee to cause harm to the significance of the conservation area and listed building and recommend that options for reducing this





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harm are explored. This could include considering a smaller marquee, located in a less dominant position and of a higher quality design.

Unless options are explored to reduce the harm, we do not think the application is capable of meeting paragraph 195 of the NPPF which requires an applicant to demonstrate they have avoided or minimised harm.

In reaching a decision on this proposal, your Council will need to weigh the harm against the public benefits. Historic England cannot comment on the public benefit of a temporary marquee, but we hope it is helpful to understand that we do not think the proposal delivers any heritage benefits.

Yours sincerely

Thomasin Davis

Thomasin Davis

Assistant Inspector of Historic Buildings and Areas

E-mail: Thomasin.Davis@HistoricEngland.org.uk



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