Former Police Station, Windmill Street, Gravesend Heritage Statement

Planning Issues Ltd

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Executive Summary

This Heritage Statement has been produced for Planning Issues Ltd on behalf of Churchill Living and Housing 21 to accompany a planning application for the development of the former police station site, Windmill Street, Gravesend to provide 67 new retirement units.

A previous application was submitted for the Site in 2022. The development has now been revised and this statement is intended to support the new application. This statement updates the results of the Heritage Statement produced in 2022 and considers the potential impacts from the revised scheme on the historic built environment. It should be read alongside the 2022 report which is included at Appendix A of this report. The validity of the earlier baseline has been checked for the purposes of this report and a review undertaken of any changes in the historic environment which may have a bearing on the assessment.

The Site lies within the Upper Windmill Conservation Area with and in proximity to several designated and non-designated buildings. In line with paragraph 219 of the NPPF and local planning policy CS20: Heritage and the Historic Environment, it is concluded that the redevelopment of the Site will enhance the heritage significance of the Upper Windmill Street Conservation Area through removal of a gap site and infrastructure of no visual or architectural interest. This assessment has also concluded no harm on any historic buildings, both designated and non-designated as a result of the proposed scheme.

1. Introduction

1.1.1 Ecus Ltd (now Cura Terrae) were commissioned by Planning Issues Ltd on behalf of Churchill Living and Housing 21 in February 2022 to prepare a Heritage Statement for the former Police Station, Windmill Street, Gravesend (hereafter 'the Site'). The 2022 application was for the development of 48 retirement units.

1.1.2 A new application is now being submitted for a revised scheme of 67 one-bedroom retirement apartments, plus car parking. This statement updates the results of the earlier statement and considers the potential impacts from the revised scheme on the historic built environment. It should be read alongside the 2022 report, included at Appendix A, which provides a comprehensive background. The validity of the baseline has been checked for the purposes of this report and a review undertaken of any changes in the historic environment which may have a bearing on the assessment. The methodology for this report is as set out in the 2022 report. It has been undertaken in accordance with current planning policy, notably the National Planning Policy Framework (2025) and guidance produced by Historic England.

1.1.3 The Site is centred at National Grid Reference (NGR) 564702, 173796 (Figure 1). It was formerly occupied by the former police station which was demolished by 2016. It now comprises an undeveloped parcel of land with access principally afforded from Woodville Place to the north.

2. Baseline Overview

2.1.1 The following overview draws upon the baseline presented in the 2022 statement (see Appendix A) which has been checked for validity. It focuses on those heritage assets identified as being potentially affected by the earlier scheme in order to inform the assessment in Section 3.

2.1.2 The Site lies within the Upper Windmill Street Conservation Area, which itself contains a number of listed buildings and locally listed buildings, some of which are located opposite the Site. The Upper Windmill Conservation Area is considered to be of heritage significance due to its historic, architectural, artistic, and archaeological interests which are derived from the development of the area as a key thoroughfare in the nineteenth century. The central core, which comprises twentieth century civic and administrative buildings (Civic Centre and Woodville Halls) and within which the Site lies, forms a notable feature within the Conservation Area. The wider townscape, and the network of roads, principally Windmill Street and Wrotham Road, are of interest as key avenues of movement. These routes also highlight the continuing growth and character and appearance of the settlement from the early nineteenth century onwards. Due to the local topography, clear views are afforded along the linear route of Windmill Street whilst the meandering course of Wrotham Road affords a series of more deflected views. In addition, the presence of tightly-knit buildings, forming a continuous built line along the road, funnels these views.

2.1.3 The historic buildings along Windmill Street present a cohesion of architectural styles and building materials. Of note is the range of buildings located between Lord Street and South Street which are noted for remaining 'intact to the original residential form', being Georgian and Victorian dwellings of predominantly three storeys with buff brick and rendered exteriors. Their arrangement is also typical of their date with terraces set back from the street and raised ground floors. Where shopfronts have been inserted, these are generally sympathetically executed. Also of note is the Emmanuel Baptist Church forms an important landmark between the terrace rows.

The Site lies within the Civic Centre Character Area which is focused on three key civic buildings. The buildings date from the late twentieth century and are noted within the Conservation Area Character Appraisal as not in keeping with the majority of the surrounding townscape and dominating the surrounding built form and street pattern (GBC 2009, p. 31-32). However, their arrangement is noted as contributing to the spacious character of the area and for enabling permeability along key streets. The police station which stood within the Site has been demolished and, as such, the Site is not in keeping with the urban character which defines this area. It comprises a vacant 'gap site' which lacks coherence and townscape value. Where the Site appears in views within the Conservation Area it appears as a neglected parcel of land detracting attention away from its surroundings. The Site does not therefore complement or enhance its surroundings nor does it enrich our understanding, experience and appreciation of the historic development and the overall character and appearance of the Conservation Area.

3. Impact Assessment

3.1 Updated Scheme Description

3.1.1 The proposed scheme includes:

- Demolition of all existing infrastructure including boundary walls;
- Construction of a retirement living apartment in the Site with associated services;
- Retention of existing access off Woodville Place to the north with car parking in the north western extent of the Site;
- Footpath access afforded off Woodville Place, Windmill Street and Wrotham Road;
- Removal of existing layby to the west and pavement instated to link Zion Place with Wrotham Road; and
- Landscaping including retention and introduction of planting and amenity grass.

3.1.2 The scheme involves the construction of a single residential block fronting Windmill Street. It is 'T'-shaped in plan with the main ranges aligned north-south and the arm extending to the west. Car parking will be added to the north, off Woodville Street, with the area to the south on Zion Place landscaped. Existing trees along Windmill Street and Wrotham Road will be retained and the whole building will be set back from the street behind railings and hedges to add greenery. The building will extend over four storeys and be constructed from a combination of buff brick and render. Interest will be added through the use of stepped elevations and balcony detail.

3.2 Assessment

3.2.1 The removal of the surviving infrastructure associated with the former late twentieth century police station within the Site presents the opportunity for regeneration and to introduce a building which will have a positive benefit to the Upper Windmill Street Conservation Area. The scheme has been designed to complement the character and appearance of the Conservation Area through the use of sympathetic building materials and restrained architectural detailing. In addition, the stepped elevations break up the mass of the structure, reflecting the terraces opposite. The retention of trees along the main streets, alongside the additional railings and building set back reflect the arrangement seen in the historic buildings along Windmill Street. While the proposed building is taller than the streetscape to the east, its location utilises local topography, ensures that it will not be clearly visible from the surrounding streetscape and does not introduce a landmark feature in the townscape and skyline. In terms of scale, the proposed building will be situated between two large structures, providing a transition between these and the smaller buildings opposite.

3.2.2 Whilst the proposals will introduce a new development into the Upper Windmill Street Conservation Area, it would enhance the character and appearance of the designated area through the removal of existing infrastructure and introduction of appropriate built form. The

urban character of the Conservation Area would be retained and redevelopment would not harm the key contributors which enhance its character and appearance. There will, therefore, be no harm to the special interest of the Upper Windmill Street Conservation Area.

3.2.3 Redevelopment of the Site would also not harm the buildings identified as either nationally designated or non-designated buildings within the Conservation Area, including those opposite the Site. The heritage interests of these buildings, individually and collectively, would continue to be understood and appreciated and they would continue to enhance the streetscapes in this area. Whilst the Site would pose a change to the shared street scene with these buildings, it is not considered to affect or reduce the legibility of them or their contribution to the understanding of the historic development of the settlement.

4. Conclusion

4.1.1 This statement represents an update to the earlier Heritage Statement prepared in 2022 and provides an assessment of the revised scheme now being submitted.

4.1.2 The Site is proposed for redevelopment comprising retirement living accommodation. The Site lies within the Upper Windmill Street Conservation Area, and in proximity to several designated and non-designated buildings.

4.1.3 In line with paragraph 219 of the NPPF and local planning policy CS20: Heritage and the Historic Environment, it is concluded that the redevelopment of the Site will enhance the heritage significance of the Upper Windmill Street Conservation Area through removal of a gap site and infrastructure of no visual or architectural interest. This will result in improvements to the street scene along with the introduction of a building of visual interest and positive public realm. Although the proposals present a change, such change would not diminish our understanding of the historic environment, those key elements which contribute to it, or ability to appreciate and experience it.

4.1.4 This assessment has also concluded no harm on any historic buildings, both designated and non-designated as a result of the proposed scheme. The development takes the opportunity for regeneration and to introduce a sympathetic and appropriately designed building which will maintain the positive aspects of the setting of the historic buildings. The scheme will also remove a negative gap site and enhance the street scene which contributes to the setting of these heritage assets.

4.1.5 Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'with respect to any buildings or other land in a conservation area... special attention shall be paid to the desirability of preserving or enhancing the character and appearance of that area'. Relevant local policy comprising CS20: Heritage and the Historic Environment outlines that proposals that preserve, and where appropriate, enhance the significance of heritage assets will be supported including those that preserve and enhance the Conservation Areas in the borough. It is concluded that the proposes scheme is, therefore, in accordance with national and local planning policy.

Appendix A: 2022 Heritage Statement

Former Police Station, 133 Windmill Street, Gravesend, DA12 1DB –

Heritage Statement

Planning Issues Ltd

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April 2022

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Ecus accepts no responsibility for the accuracy of third party data used in this report.

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Executive Summary

Ecus Ltd was commissioned by Planning Issues in February 2022 to prepare a heritage statement for 133 Windmill Street in Gravesend. The Site formerly comprised a police station which has since been demolished. The planning application is for redevelopment comprising retirement living accommodation and associated services, car parking and landscaping.

This assessment has concluded that the existing built form in the Site is of no heritage interest and is not considered a constraint to development. Its removal would result in no harm to the Upper Windmill Conservation Area.

The Site lies within the Upper Windmill Street Conservation Area which contains several designated and non-designated historic buildings. Whilst this assessment recognises that redevelopment would result in a change in the street scene and townscape, such change needs to be considered in the current context of the Site, the positive benefits it will bring and that it would not harm the ability to understand, experience and appreciate the historic environment.

As no harm has been identified as part of this assessment, the proposals accord with Planning (Listed Buildings and Conservation Areas) Act 1990 and comply with the National Planning Policy Framework and local planning policies relating to the protection of and development within the historic environment. Indeed the proposed scheme takes the opportunity to enhance the character and appearance of the conservation area and the setting of nearby listed buildings.

This assessment has also identified no harm to any further designated heritage assets located within Gravesend as part of this assessment.

This assessment has been commissioned to focus solely built heritage and Conservation Areas and therefore does not discuss the proposals with regard to buried archaeology. This has been provided in a separate Archaeological Desk-Based Assessment produced as part of the planning application by Ecus Ltd in March 2022.

1. Introduction

1.1 Project Background

1.1.1 Ecus Ltd was commissioned by Planning Issues in February 2022 to prepare an heritage statement (HS) for 133 Windmill Street in Gravesend (hereafter 'the Site'). The Site is centred at National Grid Reference (NGR) 564702, 173796 (Figure 1).

1.2 The Site

1.2.1 The Site is located within the town of Gravesend in north west Kent on the southern bank of the River Thames which lies 800 m north of the Site.

1.2.2 The Site is broadly square in shape and bordered by Woodville Place to the north, Windmill Street to the east, Zion Place to the south and Wrotham Road to the west. The Site is *c*. 3,521 m^2 in extent.

1.2.3 The Site comprised a former police station which was demolished by 2016 (Plates 1-7). It now comprises an undeveloped parcel of land with a thick, reinforced-concrete slab surface. Along the boundaries of the Site is a boundary wall constructed of brick with brick surfacing on the exterior and within the west of the Site is a layby. Access into the Site is principally afforded from Woodville Place, to the north, although pedestrian access was formerly provided off Windmill Street to the east via the south eastern corner. The associated steps and ramps remain present in this area. Although the former police station was demolished by 2016, it is understood to have since been used as builder's yard and associated infrastructure remains present within the Site.

Plate 1. View across the Site towards the south

1.2.4 The immediate environs surrounding the Site comprise residential properties to the east, south and west, with the Gravesham Council building to the north.

1.2.5 The Site is relatively level and a recent topographical survey illustrates it lying between 19-22 m above Ordnance Datum. The level within the Site is split, with a lower level/basement within the northern half of the Site and a higher level/ground floor to the south. The difference between the ground levels is *c.* 2.5 m.

Plate 2. View across the Site towards the north

Plate 3. View of Site entrance off Woodville Place

Plate 4. View across the northern part of the Site, looking east

Plate 5. View across the Site towards the south east

Plate 6. View of former pedestrian access off Windmill Street

Plate 7. View towards the layby which forms the western extent of the Site

1.3 Aims and Objectives

1.3.1 The purpose of this HS is to determine, as far as is reasonably possible from existing records and observations, an understanding of the historic environment resource within and surrounding the Site in order to formulate:

- An assessment of significance of the known or predicted heritage assets considering, their archaeological, historic, architectural and artistic interests; and
- An assessment of the impact of proposed redevelopment or other land use changes on the significance of the heritage assets and their settings.

1.3.2 This assessment has been commissioned to focus solely on determining the potential impacts of the proposals on built heritage and Conservation Areas. An assessment of any potential impacts on buried archaeology is provided in an accompanying archaeological desk-based assessment (ADBA) produced by Ecus Ltd in March 2022. It is recommended that both documents be read in conjunction with each other.

1.4 Regulatory and Policy Context

1.4.1 There is national legislation and guidance relating to the protection of, and development on, or near, important archaeological sites or historical buildings within planning regulations as defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system. Further detail of the relevant, legislation, policy and guidance is provided in Appendix 1.

2. Methodology

2.1 Standards

2.1.1 This assessment is undertaken in accordance with:

- Historic England's Historic Environment Good Practice Advice (GPA) in Planning Notes:
  - *The Historic Environment in Local Plans* (2015a);
  - *Managing Significance in Decision-Taking in the Historic Environment* (2015b); and
  - *The Setting of Heritage Assets* (2017a).
- Historic England's *Understanding Place – Historic Area Assessments* (2017b);
- Historic England's Advice Notes:
  - Advice Note 1 (Second Edition): *Conservation Area Appraisal, Designation and Management* (2019a);
  - Advice Note 7 (Second Edition): *Local Heritage Listing: Identifying and Conserving Local Heritage*.
  - Advice Note 12: *Statements of Heritage Significance: Analysing Significance in Heritage* (2019b).
- *Historic Environment* (revised July 2019), published by the Ministry Housing, Communities and Local Government (MHCLG), providing advice on enhancing and conserving the historic environment;
- The Chartered Institute for Archaeologists' *Code of Conduct* (CIfA 2019); and
- The Chartered Institute for Archaeologists' Standard and Guidance for Historic Environment Desk-Based Assessment (2020).

2.2 Scope of Assessment

2.2.1 The initial step of the heritage assessment process is the identification of heritage assets likely to be affected by the proposal due to their presence within the scheme or due to sensitivity of their setting. This is informed through a desk-based study and site visit. This step constitutes Step 1 of Historic England's GPA3 (2017a).

2.2.2 A 250 m study area has been utilised for the purpose of this assessment.

2.2.3 The following sources were consulted to inform the presence of heritage assets within the study area, and to form a baseline for the assessment of their significance:

- National heritage datasets including the National Heritage List for England (NHLE);
- The Kent Historic Environment Record (KHER);
- Photographs of the former late twentieth century police station within the Site available online;
- Historic mapping available online;
- Aerial photography available online at Britain from Above, Cambridgeshire Aerial Photographic collection online and National Collection of Aerial Photography (NCAP);
- Satellite imagery from Google Earth;

- Gravesham Borough Council (GBC) *Upper Windmill Street Conservation Area Character Appraisal* (2009);
- Kent County Council (KCC) *Kent Historic Towns Survey Gravesend Archaeological Assessment Document* (2004); and
- A site visit undertaken in February 2022.

2.2.4 The site visit was undertaken in order to assess the general character of the Site, to identify heritage assets not identified through desk-based review, and to assess the heritage interest and sensitivity of heritage assets within the study area. Heritage assets in the vicinity of the Site were visited to assess the attributes of their setting that contribute to their significance, ground truth views between heritage assets and the Site and viewpoints where they may be seen alongside one another. The site visit was undertaken in clear dry weather conditions with good visibility.

2.2.5 Although all of the spatial data held by the KHER for the study area was requested, assessed, and analysed as part of this assessment, it has not been reproduced on the accompanying figures nor listed in Appendix 2 of this report. The KHER data is discussed in more detail with reference to the buried archaeological resource in the separate ADBA produced by Ecus Ltd.

2.2.6 A bibliography of documentary, archive, and cartographic sources consulted is included in the References section of this report.

Assumptions and Limitations

2.2.7 This report is compiled using secondary information derived from a variety of sources, only some have been directly examined.

2.2.8 Archival material relating to the Site and study area was not consulted in person at the Kent Archives. An initial review of the online catalogue did not reveal any further information, to that which could be obtained online or would further inform our understanding of the Site and its historic development. Whilst there may be other material held in private collections, local repositories and the National Archives, it was not possible to view these as part of the assessment.

2.2.9 All Ordnance Survey (OS) mapping obtained as part of the assessment is provided in Appendix 3.

2.2.10 Aerial photography held at Historic England's Archives was not viewed as part of this assessment. Aerial photography was utilised to fully understand the historic development although no aerial photographs which illustrate the Site clearly were available via the sources listed in Section 2.2.

2.2.11 Sufficient access was afforded to the Site during the site visit and sufficient access was afforded to the surrounding townscape from Public Rights of Way in order to assess the settings of heritage assets and the contribution of the Site to these settings. As the majority of Listed Buildings comprise private properties, no access was afforded to their immediate grounds. As such, an assessment of the likely impacts upon the significance of the assets due to changes to their setting was taken from the adjacent footpaths and roads.

2.3 Assessment of Significance

2.3.1 The National Planning Policy Framework (NPPF 2021) recommends that, in determining applications, local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting (NPPF, 194).

2.3.2 The significance of heritage assets is defined in terms of their value to this and future

generations because of their heritage interest, deriving not only from their physical presence, but also from their setting. This interest may be archaeological, architectural, artistic or historic (NPPF):

- **Archaeological interest**: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

(MHCLG 2019, Paragraph: 006 Reference ID: 18a-006-20190723).

2.3.3 The heritage interest of an asset's physical presence is assessed in terms of attributes identified in statutory criteria, general principles for selection (DCMS 2013 and 2018), selection guides published by Historic England, and regional research agendas.

2.3.4 The heritage interest of an asset's setting is assessed in accordance with Step 2 of Historic England's GPA3 (2017), which considers the physical surroundings of the asset (including its relationship with other heritage assets); the way in which the asset is appreciated, and the asset's associations and patterns of use. Attributes of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2).

2.3.5 The overall significance of a heritage asset is the sum value of its interest expressed within this report on a six-point scale of Very High, High, Medium, Low, Negligible and Unknown using the criteria presented in Table 1.

2.3.6 The contribution of a given site or application area to an asset's significance is assessed in order to provide a basis for assessing the sensitivity of the heritage asset to change within that specific area. The criteria for this assessment are presented in Table 2.

2.3.7 Although non-designated heritage assets are not considered to be of sufficient interest to merit formal designation, they are still considered an important feature of the local built environment and thus requires consideration as part of the planning process in line with paragraph 203 of the NPPF. It is currently understood that Gravesend Council does not currently maintain a formal list of Locally Listed Buildings although suggestions for inclusion in Upper Windmill Street Conservation Area include houses in Zion Place, Victoria Avenue and Windmill Street; as part of this assessment these buildings will be assessed in conjunction with the Conservation Area.

Table 1: Criteria for determining the significance of heritage assets

Heritage Significance	Criteria
Very High	World Heritage Sites and the individual attributes that convey their Outstanding Universal Value, or non-designated heritage assets of demonstrable international heritage interest.
High	Scheduled Monuments, Listed Buildings (Grade I, II*, II), Conservation Areas, Registered Historic Parks and Gardens (Grade I, II*, II), Registered Battlefields, Protected Wreck Site, or non-designated heritage assets of demonstrable national importance due to their heritage interest.
Medium	Locally Listed Buildings and Landscapes, or non-designated heritage assets of demonstrable regional importance due to their heritage interest.
Low	Non-designated heritage assets of demonstrably limited heritage interest.
Negligible	Non-designated heritage asset of very limited heritage interest, typically due to poor preservation, survival or restricted contextual associations.
Unknown	The significance of the heritage asset cannot be ascertained from available evidence.

Table 2: Criteria for valuing the contribution of the Site to the significance of heritage assets

Contribution of Site	Criteria
High Contribution	The site possesses attributes that make a strong positive contribution to the understanding and/or appreciation of the interests that embodies its significance.
Medium Contribution	The site possesses attributes that make some positive contribution to the understanding and/or appreciation of the interests that embodies its significance.
Low Contribution	The site possesses attributes that make little positive contribution to the understanding and/or appreciation of the interests that embodies its significance.
Neutral Contribution	The site does not contribute to the understanding and/or appreciation of the interests that embodies its significance
Negative Contribution	A site detracts from the understanding and/or appreciation of the interests that define the significance of a heritage asset.

3. Historic Environment Baseline

3.1 Introduction

3.1.1 In accordance with Step 1 of Historic England's GPA3 (2017a) and *Understanding Place – Historic Area Assessments* (2017b) – Level 1 Outline Assessment, an outline assessment of the historic environment was undertaken. The details of this assessment are documented in Section 3.2 of this report.

3.1.2 National Heritage List for England entries are depicted on Figure 2 and referenced by their NHLE entry number. A gazetteer of designated heritage assets within the study area is provided in Appendix 2.

3.1.3 Section 3.2, below, also provides an overview of the historic development of the Site, informed by a map regression.

3.2 Historic Area Assessment

Outline Assessment

3.2.1 By the late early medieval period Gravesend comprised a small market town and river staging point. The place name of Gravesend is suggested to have Saxon origins as it is first documented as *Gravesham* in 1086 and suggested to derive from the Saxon word *Gerefa* (the head man) and *ham* (settlement), i.e. Gerefa's settlement, or the Old English *Graf* (grove) and *ende* (end) meaning at the grove's end. Whilst in 1086 Gravesend was held as a single manor by the Bishop Odo of Bayeux, prior to this in 1066 it was three separate estates (GBC 2009; VCH 1797; Palmer and Powell-Smith 2016).

3.2.2 By the post-medieval period settlement was centred on the East Street, West Street and High Street although little remains of the early post-medieval townscape due to extensive fires in the eighteenth and nineteenth centuries.

3.2.3 The Site lies to the west of Windmill Street, the dividing line between the ancient parishes of Gravesend and Milton. Windmill Street developed during the first half of the nineteenth century as the town expanded south and it was a principal approach route into the town from the London to Rochester road. The settlement pattern along this road comprised terrace houses and/or paired villas, with several dating from the early to mid-nineteenth century now designated Grade II Listed Buildings (i.e. no. 38-50 NHLE: 1025880; no. 51-54 NHLE: 1089007; no. 55-59 NHLE: 1089008; no. 123-126 NHLE: 1089009 etc.).

3.2.4 Wrotham Road to the west of the Site was constructed in 1825 as a turnpike road. Settlement pattern along this road is similar to Windmill Street, although several of the early to mid-nineteenth century buildings along the eastern side of the road were removed prior to the civic and administrative development of the Site and its environs to the north during the twentieth century.

3.2.5 The introduction of the railway in the mid-nineteenth century influenced the growth of Gravesend and resulted in the replacement of the agricultural hinterland with ribbon development and small housing estates on outlying roads throughout the nineteenth and early twentieth century. By the second half of the twentieth century the landscape between the settlement core and the main A2 trunk had been infilled and the town also expanded to the east and west.

3.2.6 Today the Site lies between an area of commercial and civic activity to the north and predominately residential development to the south.

3.2.7 The immediate environs to the north of the Site contain the administrative core of the borough of Gravesend and comprise large-scale, coarse-grain civic and administrative

buildings constructed in the mid-twentieth century (the Civic Centre, Gravesend Borough Council and Woodville Halls) with a large public forecourt to the north. Their scale, mass and size does not correlate with the surrounding built form and as a result the buildings, and the forecourt, act as a central focal area for the area surrounding the Site. Surrounding them to the east, north and west are commercial premises, principally small local business with upper floors used for residential accommodation.

3.2.8 As Windmill Street extends south it becomes more residential in character and many of the earlier large nineteenth century buildings are now in multiple occupancy. Windmill Street is lined with a tightly-knit, high-density, planned development of typically three to four storey buildings and their position adjacent to the roadside, although set back behind front areas and gardens, channels views along the road to the north and south. Wrotham Road to the west of the Site contains nineteenth century terraced housing with twentieth century infill development and the scale and size is similar to that along Windmill Street. In comparison, domestic terraces of smaller scale are present along Zion Place.

3.2.9 Historic buildings are typically built in local materials such as yellow and red brick although, due to subsequent development, change render and stucco render is also present. The administrative buildings to the north of the Site are more Brutalist in style and utilise reinforced concrete. The most common roofing material is Welsh slate although, on many buildings, these have since been replaced with concrete tiles. Other architectural elements noted within this area include Italianate and classical ornamental details, wrought iron balconies, sash windows, dwarf boundary walls and cast iron railings.

3.2.10 The wider townscape of Gravesend is urban in character and characterised by high-density built form of varying design, scale and materials. Parrock Street surface car park lies to the east, a large open area of hardstanding which contrasts to the densely developed surrounding streetscapes, and to the west are roads of nineteenth century terraced housing within Darnley Road Conservation Area.

3.2.11 The majority of the buildings within the area surrounding the Site are set back from the roadside behind front areas and gardens although these elements are not present in front of commercial preemies on the east side of Windmill Street.

3.2.12 In its current character and appearance, the Site forms an undeveloped ‘gap site’ between the commercial buildings to the north and predominately residential to the south, although there are a limited number of commercial premises in this area. It is not in keeping with the function or character of surrounding townscape and is of no visual interest and poor public realm. The layby in the western extent of the Site provides no positive contribution to the streetscape and the Site is considered a negative feature in the landscape.

Map Regression

3.2.13 The earliest cartographic source consulted for the purpose of this assessment was the Parish of Gravesend Tithe Map from 1841. As illustrated on Figure 3, this records the presence of residential buildings within the eastern extent of the Site, with the remainder undeveloped. The buildings are recorded under several different occupiers and landowners in the accompanying Tithe Apportionment. Parcel 884, which occupies the central and western extent of the Site, is recorded as ‘building ground’ held by Robert Coles Arnold and owned by the Earl of Darnley. The surrounding road network to the east, south and west, is also recorded on this map.

3.2.14 OS mapping from the late nineteenth century onwards records change within the Site, with the presence of residential buildings, semi-detached buildings with gardens to the rear, lining the eastern and western boundaries of the Site. The buildings along the western boundary of the Site are labelled as Woodville Terrace, with associated

outbuildings recorded within the rear gardens.

3.2.15 The Site appears to have been subject to limited alteration until the mid-twentieth century when it was redeveloped into a fire and police station. The fire and police station is understood to have been built by 1942 (KHER). The building covered the majority of the Site with the exception of a central courtyard and comprised a rectangular, single-storey range with second-storey elements and parade ground. Access was afforded off Windmill Street to the east and a ramp is recorded within the northern part of the Site. The existing layby, located outside of the police and fire station, but within the western extent of the Site, was established by this date.

3.2.16 During the mid-twentieth century, a Second World War Civil Defence Control Centre occupied the basement of the Site, which was decommissioned in 1945, and the road Woodville Place to the north of the Site had been established.

3.2.17 Whilst OS mapping from the mid-twentieth century onwards records the expansion of civic and administrative buildings within the townscape surrounding the Site, the Site itself was subject to limited change. By 1973 the fire and police station was demolished.

3.2.18 By 1975 the Site was in use solely as a police station and the buildings on site has been redeveloped to the orientation which was present until its demolition in 2016. Although demolished, the boundary wall still features the foundation stone of the earlier fire and police station and Civil Defence Control Centre (Plate 8). Although the Site has since been used as an impromptu builder's yard, it comprised a vacant brownfield site during the site visit. The layby to the west remains in use for car parking.

Plate 8. Foundation stone in the east boundary wall

3.3 Summary of Potential Heritage Constraints

3.3.1 As the Site lies within the Upper Windmill Street Conservation Area, as illustrated on Figure 2, this will be subject to further assessment in order to establish how the Site contributes to the character and appearance, and thus heritage significance of the area.

3.3.2 The Upper Windmill Street Conservation Area includes both designated and non-designated buildings, the latter of which comprises buildings identified as 'buildings of local interest' in the Conservation Area Character Appraisal (GBC 2009). Redevelopment of the Site would not result in direct, physical impacts on these buildings and consequently the heritage interests inherent in their physical fabric would remain unharmed. As the proposed redevelopment would result in a change within the Site, which is located on street scenes which contribute to both the setting of these

historic buildings and the overall significance of the Conservation Area, any indirect effects caused by the change on the historic buildings will be assessed in conjunction with impacts to the Conservation Area. The significance of the historic buildings will therefore be addressed as part of the Conservation Area in Section 4 and no historic building will be subject to a separate assessment.

3.3.3 There are three Grade II Listed Buildings located outside of Upper Windmill Street Conservation Area in a distance of 250 m from the Site. These comprise 62 and 64 Wrotham Road (NHLE: 1089010) and Gravesend Railway Station Upper Side and Downside (NHLE: 1057649 and 1341495). Given the distance from, absence of any historic or functional association with, and restricted visibility due to presence of intervening built form, redevelopment of the Site would not alter the heritage interests or setting of these historic buildings. As no harm has been identified, they have been excluded from any further assessment.

3.3.4 In addition to the Upper Windmill Conservation Area, a further three Conservation Areas lie within a distance of 250 m from the Site. These comprise King Street, Windmill Hill and Darnley Road. Redevelopment of the Site would not directly impact upon the designated area (or any historic buildings located within). Whilst these Conservation Areas will not be discussed within Section 4, given that the Site and Upper Windmill Conservation Area form part of the setting of these Conservation Areas, any impacts as a result of the proposals are discussed in Section 5.

Buildings within the Site

3.3.5 The existing infrastructure within the Site is associated with the former late twentieth century police station which was demolished in 2016. The surviving infrastructure, including boundary walls, are void of any interesting architectural features or detailing and are not considered to be of historic, architectural or aesthetic interest. The surviving infrastructure is not of an early date and the overall design and appearance, surviving plan/layout, and construction does not feature innovation, architectural quality or rarity. There is also no known historical association with nationally or locally famous architects or craftsman. The surviving infrastructure is therefore considered to be of no heritage significance and its removal is not considered a constraint to the proposed redevelopment of the Site.

Foundation Stone

3.3.6 As illustrated in Plate 8, a foundation stone is present in the east boundary wall of the Site. The foundation stone relates to the mid-twentieth century fire and police station and the Civil Defence Control Centre which operated in the basement of the former fire and police station during this period. The significance of this foundation stone is discussed in Section 4.

4. Statement of Significance

4.1 Introduction

4.1.1 The following section assesses the heritage significance of Upper Windmill Street Conservation Area. In accordance with Step 2 of Historic England's GPA3 (2017a) the following section assesses the significance of the Conservation Area and how the Site contributes.

4.1.2 It is not the intention to repeat information provided in the Conservation Area Character Appraisal produced by GBC in 2009 for this area. Whilst this document has been reviewed for the purpose of this assessment, the following is a summary and therefore should be read in conjunction with that document.

4.2 Upper Windmill Street Conservation Area

4.2.1 The Upper Windmill Street Conservation Area is located to the south of the historic core of Gravesend and was designed in January 1970. The designated area is defined to the north by the railway, east by the northern part of Windmill Street and west by Stone Street and Wrotham Road.

4.2.2 The Upper Windmill Conservation Area is considered to be of high heritage significance due to its historic, architectural, artistic, and archaeological interests which are derived from the history and development of the settlement. The central core, which comprises twentieth century civic and administrative buildings (Civic Centre and Woodville Halls), forms a principal landmark in both the Conservation Area and the wider townscape, and the network of roads, principally Windmill Street and Wrotham Road, are of particular significance as key avenues of movement. These routes also defined the continuing growth and character and appearance of the settlement from the early nineteenth century onwards and its subsequent redevelopment. Due to the local topography, clear views are afforded along the linear route of Windmill Street whilst the meandering course of Wrotham Road affords a series of more deflected views. The presence of tightly-knit buildings, forming a continuous built line along the road, funnels views and contributes to the experience along them.

4.2.3 The Conservation Area contains buildings of high heritage significance which are recognised through their designation as either Listed Buildings or non-designated Locally Listed and 'buildings of local interest'. Due to the varying character and appearance of the Conservation Area and associated built form, five character areas have been identified[1]:

- Character Area 1: Windmill Street and Stone Street (the commercial area) – this character area encompasses Windmill Street and built form located to the east of the Site;
- Character Area 2: Windmill Street (residential) – this character area encompasses the southern part of Windmill Street between South Street and Clarence Place;
- Character Area 3: Zion Place, Sheppy Place and Victoria Avenue – this character is located to the south and south west of the Site;
- Character Area 4: Wrotham Road – this character area encompasses Wrotham Road and the built form located to the west of the Site; and
- Character Area 5: The Civic Area – the Site is located within this area.

[1] The exact location of the Character Areas are illustrated in the Conservation Area Appraisal Appendix 2 p. 42.

Character Area 1

4.2.4 Character Area 1 encompasses Windmill Street, a principal arterial route into Gravesend, and buildings along this route are predominately nineteenth century in date. The significance of the road derives from its historic development and the architectural interest of the buildings located upon it, the majority of which comprise designated and non-designated 'buildings of local interest'. The buildings located between Lord Street and South Street on the east side of Windmill Street are noted for remaining '*intact to the original residential form*' and the Emmanuel Baptist Church forms an important landmark between the terrace rows (GBC 2009, p. 26). Due to local topography and the linear character of Windmill Street views are afforded along the course of the road and these have been identified as 'positive' in the Conservation Area Character Appraisal (GBC 2009, p. 40).

4.2.5 Views from Windmill Street encompass the Site[2] although, in its current character and appearance, the Site is void of any visual interest (Plates 9-10). Whilst the presence of trees in the eastern extent of the Site, identified as 'significant trees/tree groups' in the Conservation Area Character Appraisal, adds a green aesthetic which contrasts to the urban, built-up nature of the road, the majority of the Site is not in keeping with nor positively contributes to the character of this area (GBC 2009, p. 40). The eastern extent of the Site, identified as a neutral open space in the Conservation Area Character Appraisal, also does not contribute and cannot be appreciated due to the presence of the existing boundary wall enclosing this area from the street scene (GBC 2009, p. 40). There are no clear uninterrupted views from further along Windmill Street to the north (Plates 11-12); these views encompass buildings of larger scale, i.e. Civic Centre and Woodville Halls and Cygnet House, already present in the Conservation Area. As a vacant 'gap site' the Site provides no positive or meaningful contribution this part of the character area.

4.2.6 Character Area 1 also comprises Stone Street (the commercial area) located to the north of the Civic Centre and Woodville Halls. Built form in this area is predominately commercial in character and the Woodville Gardens, together with the forecourt of the Civic Centre (Character Area 5), comprise a large area of open public space which contrasts to the surrounding tightly-knit residential roads. The significance of this area derives from the historic and architectural interest which relates to the development of this area (Woodville Gardens was the site of a former town burial ground) and the architectural interest of the built form. The green aesthetic of Woodville Gardens, designed as a sensory garden, also contributes to and contrasts with the wider built up urban character of the townscape. There are no clear views of the Site afforded from the very northern part of the Conservation Area (Plate 13), which forms this character area, and the Site is not considered to contribute to this part of the Upper Windmill Conservation Area.

[2] From beside Cygnet House looking north and the Civic Centre and Woodville Halls looking south

Plate 9. View towards the Site from the south east

Plate 10. View towards the Site from the junction between Windmill Street and Lord Street

Plate 11. View towards the Site from the forecourt of the Civic Centre and Woodville Halls

Plate 12. View along Windmill Street from north

Plate 13. View towards the south from Stone Street

Character Area 2: Windmill Street

4.2.7 Focused on the southern part of Windmill Street, between South Street and Clarence Place, the significance of this area is similar to Character Area 1 and derives from the road and the historic buildings (designated and non-designated) located along it. Due to local topography, the land rises steeply towards Windmill Hill in the south and consequently affords long-distance views along the road to the north and south. The Site is not clearly visible in such views due to distance and the presence of intervening built form along the roadside. Where visible from the northern extent of this character area (Plate 14), the eastern extent of the Site appears between existing tall buildings along the west side of the road with the trees providing a green aesthetic. The remainder of the Site is screened from view. These views are not considered to provide any significant contribution to the character area and consequently the appearance of the Site within such views, and the setting of this area, is not considered to meaningfully contribute to the heritage significance of this character area.

Plate 14. View towards the Site from Windmill Street

Character Area 3: Zion Place, Sheppy Place and Victoria Avenue

4.2.8 A smaller character area, it encompasses the residential development along Zion Place, Sheppy Place, and Victoria Avenue and the significance derives predominately from the historic buildings located along these three roads. Closest to the Site, Zion Place, located to the south and south west, was originally known as Woodville Place but was renamed in the nineteenth century and the houses located along it, identified as 'positive buildings' in the Conservation Area Character Appraisal form a two-storey terrace raised above a basement (GBC 2009, p. 29 and 40). The significance of these buildings derives from both their physical fabric, group value and historic interest and they are noted as an '*an important group of 19th century houses which survived the clearances in the vicinity in the 1960s*' although their architectural interest has been eroded somewhat by the loss of architectural features (GBC 2009, p. 29).

4.2.9 Views identified as positive within this character area comprise views looking directly towards or encompassing the buildings, as a group, along these roads. Although the Site is visible in views along the western extent of Zion Place, which forms part of this character area, it is not in keeping with those elements which contribute to the overall significance of this character area. In its current character and appearance it also does not enhance or compliment the buildings along Zion Place (Plate 15).

4.2.10 The Site does not contribute to the residential urban character which defines this character area and it has been identified within a view identified in the Conservation Area Character Appraisal which provides a negative contribution both to the character area and overall Conservation Area. This view comprises the view afforded north, due to the local topography, from Sheppy Place (GBC 2009, p. 40; Plate 16).

4.2.11 Although this assessment has concluded that such view was likely to be identified as negative due to the presence of the former late twentieth century police station within the Site, the removal of the building has resulted in a 'gap site' within the Conservation Area which is not in keeping with the urban, tightly-developed townscape which characterises this area. The view from Sheppy Place north is therefore considered to remain negative.

Plate 15. View along Zion Place looking east

Plate 16. View towards the north from Sheppy Place

Character Area 4: Wrotham Road

4.2.12 Character Area 4 comprises a small urban area of residential buildings along the west side of Wrotham Road facing east towards the Site. The buildings are of various architectural design although the majority date from the late nineteenth century and comprise two to three storey terraced houses with occasional paired or single houses located between. Principal building materials include yellow brick with detailing in stucco and polychrome brickwork and the buildings are set back from the roadside behind front areas (GBC 2009, p. 31).

4.2.13 The significance of this area derives from the historic development of Wrotham Road and the built form located along it and the architectural interests inherent in the buildings themselves. Although none of the buildings have been nationally designed or identified as 'buildings of local interest', they are considered 'positive' in the Conservation Area Character Appraisal and positive views identified in this area include those along the streetscape (north to south), along Darnley Street and from Wrotham Road encompassing nos. 8-15 Wrotham Road.

4.2.14 Whilst the Site does form part of the streetscape of Wrotham Road and is encompassed in views along the road north/south, it is not considered to provide any meaningful contribution to the views and it is void of any visual interest. Although the presence of existing trees along the western boundary provides a green aesthetic, the

majority of the Site does not preserve, enhance or contribute to the significance of this area. The Site is not in keeping with the urban residential character of the area and the layby within the western part of the Site does not add any positive benefit or public realm to the street scene of Wrotham Road (Plate 17).

Plate 17. View across the layby looking north

Character Area 5: The Civic Area

4.2.15 Character Area 5 comprises the principal administrative centre of Gravesend and contains the Civic Centre and Woodville Halls. The Civic Centre was designed by H. T. Cadbury Brown and opened in 1968.

4.2.16 Historically the centre containing the Civic Centre, Gravesend Police Station (i.e. the Site) and Cygnet House. The three buildings dating from the late twentieth century were noted within the Conservation Area Character Appraisal for *'form[ing] this character area together with the forecourt of the Civic Centre, Woodville Place and the car parks associated with the administrative buildings*' (GBC 2009, p. 31). The design of these buildings was/is not in keeping with the majority of the surrounding townscape and was noted, as a result of its scale, to dominate the surrounding built form and street pattern (GBC 2009, p. 31-32). The buildings were described in the Conservation Area Character Appraisal as being of a scale, mass and materials that '*neither reflect nor enhance the surrounding historic townscape*' and do not '*preserve no[r] enhance the character and appearance*' (GBC 2009, p. 32).

4.2.17 As outlined in Section 3, in 2016 the former late twentieth century police station within the Site was demolished. Whilst associated infrastructure does survive within the Site, it is of no visual interest and appears out of character following the demolition within the Site. In addition, Cygnet House to the south of the Site has since been significantly altered and redeveloped for residential use and its former civic and administrative function cannot be fully understood, experienced or appreciated in the landscape today. As such, the Site and Cygnet House are not in keeping with the civic and administrative character of this area and no longer form part of the core supporting the wider townscape.

4.2.18 As a result of the demolition of the police station, the Site no longer comprises a principal feature with the key elements of this character area today comprising the Civic Centre and Woodville Halls and associated forecourt and car parks associated with these administrative buildings. When visible in views which encompass the existing Civic Centre and Woodville Halls, the Site does not contribute to the understanding and/or appreciation of the interests that embodies the significance of this character area.

Plate 18. View along Woodville Place looking east

Plate 19. View along Woodville Place looking west

Plate 20. View along Zion Place looking west

4.2.19 As a result of the demolition of the police station, the former use of the Site cannot be fully understood, experienced or appreciated in the landscape today, and in its current

condition it provides no significant positive or meaningful contribution and does not harmonise or complement its surrounds (Plates 18-20). Its appearance in views does not compliment, preserve or enhance the surrounding built form. Whilst this assessment recognises that the presence of existing trees to the east and west provide a green aesthetic which contrasts to the urban built up character of the area, the contribution of the majority of the Site has been compromised by the demolition and disuse, and as a vacant open (i.e. undeveloped) Site, lacks positive public realm thus resulting in an area of poor visual amenity. The layby to the west is also of no visual interest and poor public realm.

Site Contribution

4.2.20 The Site is bounded to the north by Woodville Place, beyond which lies civic and administrative development, and to the east, south, and west by predominately residential development along Windmill Street, Zion Place and Wrotham Road.

4.2.21 Taking in account the above, the Site is not considered to provide any significant meaningful contribution to the Upper Windmill Street Conservation Area. As a result of demolition and disuse, it no longer reflects the historic development of the town and is not, in its current condition, in keeping with the urban character which defines this area. It comprises a vacant 'gap site' which lacks coherence and is not in keeping with the built up character of the townscape. Although enclosed by boundary walls, these walls are not of visual or architectural interest. Whilst the presence of existing trees adds a green aesthetic to the area, where the Site appears in views within the Conservation Area it appears as a neglected parcel of land detracting attention away from its surroundings. The Site does not therefore complement or enhance its surroundings nor does it enrich our understanding, experience and appreciation of the historic development and the overall character and appearance of the Conservation Area.

4.2.22 This assessment has concluded that the Site does not preserve or enhance the special quality of the Conservation Area and in its current character and appearance provides a negative contribution to the Upper Windmill Street Conservation Area.

4.3 Foundation Stone

4.3.1 As outlined in Section 3.2. and 3.3, a foundation stone is present within the eastern boundary of the Site. The foundation stone relates to the earlier fire and police station which operated in the Site in the mid-twentieth century and the Civil Defence Control Centre which operated in the basement of the former fire and police station during this period.

4.3.2 The foundation stone is inscribed with:

BOROUGH OF GRAVESEND POLICE FIRE BRIGADE AND CIVIL WAR DEFENCE BUILDINGS THIS FOUNDATION STONE WAS LAID BY THE WORSHIPFUL THE MAYOR COUNCILLOR WALTER C. FLETCHER J.P. ON THE 25TH OF JULY 1940 CHAIRMAN OF THE WATCH COMMITTEE COUNCILLOR A.W. HOWCROFT J.P.

4.3.3 It is also inscribed with the details of the contractors (R. Hopkins & Sons), Borough Architect (J.G. Bennett F.R.I.B.A) and the town clerk (H.H. Brown B.A.).

4.3.4 The foundation stone is considered to retain a level of historic interest which derives from its association with the former fire and police station and Civil Defence Control Centre which operated in the Site and this part of Gravesend in the mid-twentieth century. Whilst the foundation stone is an illustrative reminder of the historic environment and it contributes to our understanding of the development and use of this area during that period, due to the subsequent development and demolition of the Site in the late twentieth and twenty-first century, a full appreciation cannot be

understood, experienced or appreciated with the townscape today and is best understood from cartographic and historic sources.

4.3.5 A plaque on the foundation stone also denotes '*this plaque was retained from the original Police Station on this site*' and it is possible that the foundation stone may have been relocated during the redevelopment of the Site in the late twentieth century. The wall in which it is located is of modern date and therefore would support this theory

4.3.6 The foundation stone is recorded on KHER under the data record relating to the Windmill Street Second World War Civil Defence Control (KHER ref. Q 67 SW 1296). It is noted to '*have a value as a possible point of interest on a defence heritage trail*' (KHER). Whilst this assessment recognises that the foundation stone retains a level of interest, and is considered to be of local interest, this is not considered to commensurate to identification as either a designated or non-designated heritage asset in itself.

5. Statement of Impact

5.1 Introduction

5.1.1 This section sets out a brief description of the scheme and provides an assessment of impact with regards to the identified historic environment constraints.

Scheme Overview

5.1.2 The Site is proposed for redevelopment comprising:

- Demolition of all existing infrastructure including boundary walls;
- Construction of a retirement living apartment in the Site with associated services;
- Retention of existing access off Woodville Place to the north with car parking in the north western extent of the Site;
- Footpath access afforded off Woodville Place, Windmill Street and Wrotham Road;
- Removal of existing layby to the west and pavement instated to link Zion Place with Wrotham Road; and
- Landscaping including retention and introduction of planting and amenity grass.

5.2 Assessment of Proposed Redevelopment

Mass and Scale

5.2.1 The proposed building will be four storeys with further accommodation in roof. Although the building will be taller than the surrounding built form, it is located within an area which has the capacity to accommodate a building of such scale and which characterise this character area of the Conservation Area. It is located to the south of the Civic Centre and Woodville Hall (predominately five storeys with taller element) and to the north of Cygnet House (six storeys).

5.2.2 The location of the proposed building, utilising local topography, ensures that although a building of four and a half storeys in height, it will not be clearly visible from the surrounding streetscape and would not introduce a landmark feature in the townscape and skyline. It would not overshadow the surrounding historic built form and its position also reduces the apparent scale of the building as it will be situated between two large buildings which dominate this area and thus compliment but not compete with these structures.

5.2.3 Although the overall mass of the proposed building will be larger than the surrounding residential buildings, its set back position on Zion Place to the south and limited frontage along Wrotham Road to the west reduces its overall impact on these streetscapes. The perceived mass and bulk is broken down into discrete units reflecting the terraced nature of surrounding residential buildings.

5.2.4 The redevelopment comprises a single building, the footprint of which is not considered inappropriate as it would be located between buildings that are coarse grain with large footprints. The overall mass of the building is broken up by the proposed T-shape plan and would not fully occupy, and thus dominate, the overall building plot. The perceived mass is also offset by the setback position of the building and surrounding soft landscaping.

Layout

5.2.5 The overall positioning of the building is considered respectful to the surrounding streetscapes and the Conservation Area. Although the building will not occupy the entirety of the building plot, thus preventing the introduction of a building of

considerable mass which would be inappropriate in this area, it would establish a continuous frontage along Windmill Street, a key feature of the streetscape, and would result in the removal of a currently open vacant 'gap site'.

5.2.6 The majority of buildings within the surrounding townscape do not occupy the full size of the building plot in which they are located, and the proposed T-shape of the building allows space to be retained around the redevelopment whilst introducing a green aesthetic which would provide visual interest to the urban character. Whilst the redevelopment would introduce areas of undeveloped space surrounding the building, the scale and size ensures that they do not challenge the prominence of the forecourt, north of the Civic Centre, has or its contribution to the area.

5.2.7 The proposed layout/arrangement of the Site is also considered appropriate as the eastern part of the Site is considered to have the capacity to accommodate a larger scale building which would both be respectful to the building line, introduce a continuous frontage and be in keeping with the coarse grain development which characterises the western side of the street scene along Windmill Street to the north and south of the Site.

5.2.8 The shape and position of the proposed building is considered respectful to the streetscape of Windmill Street, a principal arterial route leading into the town, and partly reflects the former footprint of the late twentieth century police station which operated in the Site.

5.2.9 The setback position of the proposed building respects the streetscape, including the views along it. As the proposed building would be set back behind the building line along the west side of Windmill Street, it would be screened from the majority of views along the road and only visible when in closer proximity. The location and layout is also considered appropriate as it affords a degree of space between the proposed building and historic buildings situated along the roads to the east, south and west of the Site. By setting the proposed building back, the design prevents a building which dominates and overshadows its surrounds.

5.2.10 By retaining access off Woodville Place to the north, with car parking in the north west corner of the Site, this allows for a continuous built frontage along Windmill Street and setback frontage along Zion Place, and small frontage along Wrotham Road. The presence of hardstanding in front of residential development along these streetscapes is not uncommon although large areas used as car parks are typically hidden behind built form and located to the rear. In order to maintain this within the Site, the car park will be restricted to the north west corner and this is considered appropriate and positive as it restricts visibility and prevents the introduction of a new feature along Windmill Street, a key feature which characterises and contributes to the Conservation Area and townscape of Gravesend. Views from Wrotham Road to the south west would be restricted by intervening built form and the visual effects of an area of hardstanding in the north west corner of the Site would be offset by the proposed landscaping in this area. The size of the proposed car park is also of smaller scale thus preventing in the presence of a large area of hardstanding which would not be in keeping in this area.

Design

5.2.11 The removal of the former police station in 2016 has provided an opportunity for regeneration and to introduce a building which corresponds with its surrounds. The proposed development has been designed to prevent the introduction of a building which '*neither reflect*[s] *nor enhance*[s] *the surrounding historic townscape*' as the former police station did and would enhance the character and appearance of the townscape (GBC 2009, p. 32).

5.2.12 The Site lies within a townscape of varying architectural design, materials and colour palette. Although the proposed building will be located in an area which from the late

twentieth century was characterised by brutalist architecture, and continues to be by the Civic Centre, it does not intend to replicate or result in a pastiche this architectural statement which does not complement the overall heritage significance of the conservation area.. The introduction of a development which embraces aspects of the historic and modern residential built environment and incorporates detailing in a traditional way also prevents the introduction of a modern building which is generic in design.

5.2.13 The removal of the existing boundary walls is considered positive as they are of no visual or architectural interest. Although remnants of the former police station, as redundant features of a now demolished building they do not provide any contribution to the landscape and survive in a neglected condition. Plots enclosed by tall boundary walls is not a common feature in this part of the townscape and consequently their removal would result in an open site which is more in keeping with its surrounds.

5.2.14 The removal of the boundary walls would also open up the eastern extent of the Site, and along with the landscaping works, would improve the contribution this area provides both to the Upper Windmill Street Conservation Area and street scene of Windmill Street. The removal of the layby and the redevelopment of this area is also considered to enhance the street scene of Wrotham Road removing an area of poor public realm.

5.2.15 Through the removal of the boundary walls and introduction of the proposed building, the redevelopment removes the former civic and administrative character of the Site. Although the loss of this former character represents a change, such change is considered positive given that which has already occurred to the Site and thus results in the current condition. In addition, the surviving infrastructure is not in keeping with the current function of the Site.

5.2.16 Although balconies are proposed, the setback position of the proposed building prevents clear visible from further along Windmill Street and Wrotham Road to the north and south.

Materials

5.2.17 The materials proposed comprise buff brick and render (including rusticated decorative render) and these materials are considered appropriate as they reflect that already present in the area. As there are a variety of materials used, through the chosen materials the design is respectful and harmonious with as many of the existing buildings as possible. These materials along with a slate roof and decorative elements such as cills, banding, surrounds, entrance canopy and pediments would introduce a building of visual interest and enhance the street scene.

5.2.18 The proposed colour palette is also considered positive and appropriate. It would contribute to the visual interest and overall appearance of the proposed building as discrete units that reflect the terraced nature of surrounding residential. The avoidance of bright bold colours also prevents the proposed building having a negative intrusive effect on its surroundings.

5.2.19 Metal railings are proposed for boundary treatments and these will be in keeping with those present along the surrounding street scenes. The height of the railings is also considered appropriate.

Vegetation and Landscaping

5.2.20 As discussed in paragraph 5.2.6 areas of open space would be established around the proposed redevelopment as the proposed T-shaped footprint the building would not occupy the full extent of the building plot. The introduction of planting and areas of green space would add a green aesthetic to this area whilst preserving and further enhancing the contribution the existing trees (which will be retained) make to both the

street scenes and Conservation Area. As noted in the Conservation Area Character Appraisal, the presence of '*mature trees and planted beds and containers*' in the forecourt of the Civic Centre '*soften the hard urban form and the impact of the busy traffic routes*' (GBC 2009, p. 1). The loss of front gardens areas in the Conservation Area is also noted in the Character Appraisal and the introduction of the green space as part of the redevelopment would therefore reintroduce this..

5.3 Impact upon the identified Heritage Assets

Upper Windmill Street Conservation Area

5.3.1 The Site is located within the Upper Windmill Street Conservation Area which contains buildings identified as both designated and non-designated heritage assets. Although the Site lies within an area characterised by civic and administrative function, the Site in its current form is considered to make a negative contribution. As a vacant 'gap site' it is not in keeping, does not contribute to an understanding and/or appreciation of the interests that embody this area, its appearance does not preserve, enhance or enrich the character or appearance, and it is of poor public realm and no visual interest. The redevelopment of the Site therefore provides an opportunity to enhance the Conservation Area and provide positive heritage benefits.

5.3.2 The redevelopment would be located within a Site which is devoid of any built form of historic, architectural or visual interest. The Site is also absence of any element which positively and/or meaningfully contributes or embodies the heritage significance of the Conservation Area and where visible does not enhance or allow for the heritage interests or significance of the designated area to be understood or appreciated. The removal of the layby within the western extent of the Site is also considered positive and beneficial as it would result in the removal of a space which has no defined function, detracts from its surroundings due to its current condition and thus adds to the overall negative appearance and contribution of the Site. Redevelopment therefore takes the opportunity to enhance the contribution of this area by adding visual interest and improving the public realm.

5.3.3 Whilst the redevelopment would differ from the civic and administrative function that historically characterises this part of the Conservation Area, in its current condition it does not contribute as this historic function has already been removed. The significance today of Character Area 5 derives predominately from the surviving Civic Centre and Woodville Halls (and associated forecourt and car park) and this would remain unaffected. The redevelopment would not compete with or overshadow this building (thus retaining a key focal building) or negatively impact upon our understanding, experience and appreciation of its functional role in both this area and for the wider townscape of Gravesend. In addition Cygnet House to the south, which historically formed part of the area, is no longer in administrative use and consequently the change in function to residential would not be a new phenomenon in this area.

5.3.4 The redevelopment would introduce a building of four and a half storeys in height and although this would exceed the height of extant residential development in the surrounding roads, it would be located within an area which is characterised by coarse development of varying scale. It would not compete with these buildings or introduce a tall feature in the skyline and, through its setback position, would be screened from the wider landscape. This assessment has concluded that it would not appear out of character in this area.

5.3.5 This assessment recognises that the Site does lie along the streetscape of Woodville Place to the north, Windmill Street to the east, Zion Place to the south and Wrotham Road to the west, views along which have been identified as positive in the Conservation Area Character Appraisal. It has, however, concluded that the appearance of the Site in such views makes no positive or meaningful contribution.

Although the redevelopment of the Site presents a change to these street scenes, attention has been paid to soften any impacts through the combined setback position, soft landscaping, building shape and colour palette. Whilst the Site would be visible in views along the streetscape with borders the Site boundaries, its appearance is not considered to negatively impact, and the removal of the existing infrastructure associated with the former police station would be a positive benefit and overall enhancement to the area. The proposed building would not be clearly visible from further along the street scenes to the north and south. During the site visit clear visibility of the Site was noted from Sheppy Place to the south and this assessment would agree with the Conservation Area's Character Appraisal description of this view as negative. The change posed to this view, with the introduction of a building of visual interest, is not considered to result in harm but takes the opportunity to enhance the Conservation Area.

5.3.6 Redevelopment of the Site would not directly harm the buildings identified as either nationally designated or non-designated buildings within the Conservation Area. The heritage interests of these buildings, individually and collectively, would continue to be understood and appreciated and they would continue to, and thus be experienced along, the streetscapes in this area. Whilst the Site would pose a change to the shared street scene with these buildings, it is not considered to affect or reduce the legibility of them or their contribution to the Conservation Area. Although the redevelopment of the Site would result in a change within views, it would be visible in the context of the surrounding townscape and through its design would not appear out of character. Consequently no harm to the buildings, designated and non-designated, within the Conservation Area has been identified.

5.3.7 Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 states that '*with respect to any buildings or other land in a conservation area… special attention shall be paid to the desirability of preserving or enhancing the character and appearance of that area*'. Relevant local policy comprising CS20: Heritage and the Historic Environment outlines that proposals that preserve, and where appropriate, enhance the significance of heritage assets will be supported including those that preserve and enhance the Conservation Areas in the borough.

5.3.8 Whilst the proposed redevelopment will introduce a new development into Upper Windmill Street Conservation Area, it would enhance the character and appearance of the surrounding townscape through the removal of existing infrastructure and introduction of appropriate built form. The urban character of the Conservation Area would be retained and redevelopment would not harm the key contributors to the area. This assessment has not, therefore, identified any negative impacts on the heritage significance of the Upper Windmill Street Conservation Area.

Darnley Road, King Street and Windmill Hill Conservation Area

5.3.9 As outlined in Section 3.3, the Site which lies within Upper Windmill Street Conservation Area forms part of setting of Darnley Road, King Street and Windmill Hill Conservation Area. As the redevelopment will preserve and enhance the character and appearance of Upper Windmill Street Conservation Area, and no harm has been identified as part of this assessment, the setting of these three Conservation Areas will be unaffected and the scheme takes the opportunity to enhance.

Foundation Stone

5.3.10 At the time of completion of this assessment, no details were known with regard to proposals relating to the foundation stone in the east boundary wall.

5.3.11 As outlined in Section 4, this foundation is of some historic local interest and it is therefore recommended that it be retained and reinstalled, where appropriate and if possible, on the Site. By reinstating the foundation stone on site this would preserve

the historic interest through maintaining an illustrative reminder of the former use. Reinstalled elsewhere in the Site, if required, is also considered appropriate as stone refers to a former building which has already been demolished and may have been relocated to its current position during the late twentieth century.

6. Conclusion

6.1.1 This assessment has utilised a range of sources, in line with industry guidance, to identify heritage assets which could be affected by the proposals. Any effects of the redevelopment upon the significance of heritage assets will be a material consideration in the determination of the planning application.

6.1.2 The Site comprised a former police station demolished in 2016. It now comprises an undeveloped parcel of land which lacks coherence and is not in keeping with the built up character of the surrounding townscape of Gravesend. Although enclosed by boundary walls, these walls are not of visual or architectural interest. This assessment has concluded that the Site, in its current character and appearance, does not compliment or enhance its surroundings and does not rich our understanding, experience and appreciation of the historic environment.

6.1.3 The Site is proposed for redevelopment comprising retirement living accommodation. As the Site lies within the Upper Windmill Street Conservation Area, and in close proximity to several designated and non-designated buildings, an appropriate and proportionate level of assessment has been undertaken in order to assess effects caused by the proposed redevelopment.

6.1.4 The removal of the surviving infrastructure associated with the former late twentieth century police station within the Site presents the opportunity for regeneration and to introduce a building which will have a positive benefit to the Upper Windmill Street Conservation Area. In line with paragraph 206 of the NPPF and local planning policy CS20: Heritage and the Historic Environment the redevelopment of the Site will enhance the heritage significance of the Conservation Area (and historic buildings located within) through removal of a ‘gap site’ and infrastructure of no visual or architectural interest. This will result in improvements to the street scene along with the introduction of a building of visual interest and positive public realm. The proposals will improve the quality of views and the change in use would contribute to the residential character of this area. Although the proposals present a change, such change would not diminish our understanding of the historic environment, those key elements which contribute to it, or ability to appreciate and experience it.

6.1.5 This assessment has also concluded no harm on any further historic buildings, both designated and non-designated, and Conservation Areas as a result of the proposed redevelopment. The redevelopment takes the opportunity for regeneration and to introduce a sympathetic and appropriately designed building which will maintain the positive aspects of the setting of the historic buildings and Darnley Road, King Street and Windmill Hill Conservation Areas. The proposed redevelopment would reflect the continuing development of this area of Gravesend whilst introducing a building which is both contextual to its surrounds and to which it responds to. The redevelopment would remove a negative gap site and enhance the street scene which contributes to the setting of these heritage assets.

6.1.6 As the assessment has identified no harm and opportunities to make enhancements to the heritage significance of the heritage assets the proposals are considered to accord with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 and comply the NPPF and local planning policy.

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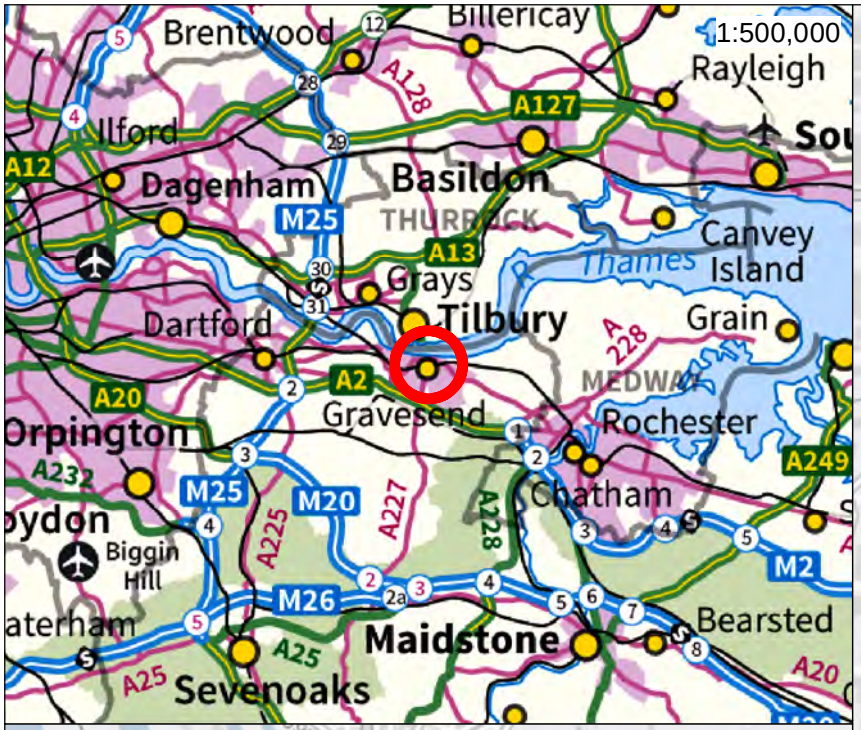
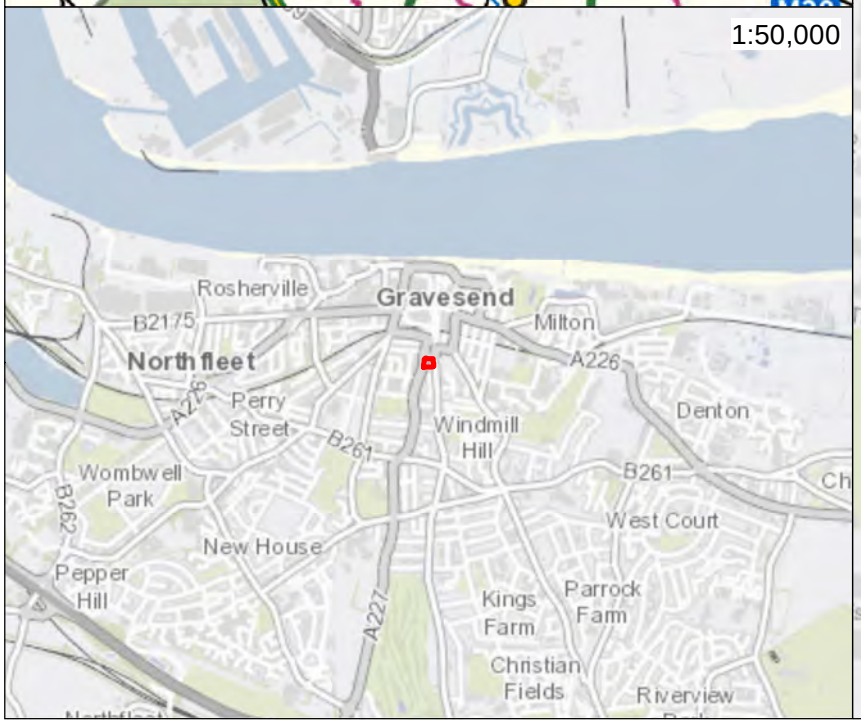
7.2 Cartographic Sources

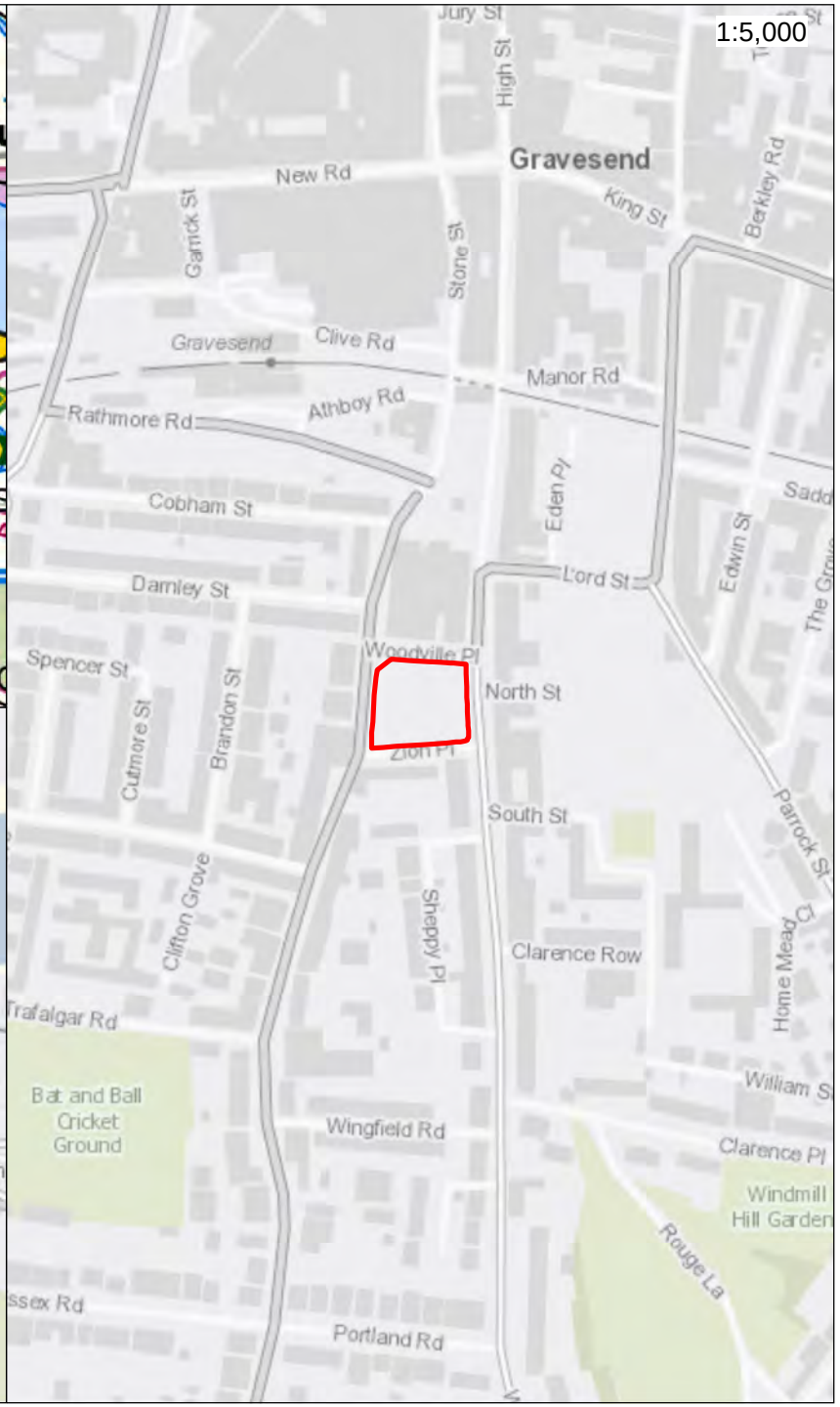
1841 Parish of Gravesend Tithe Map

All OS mapping was obtained from www.emapsite.com and is provided in Appendix 3.

Figures







ecus

KEY

Site

N

Planning Issues

Former Police Station, 133 Windmill Street, Gravesend, DA12 1DB - Heritage Statement

Figure 1: Site Location

Brook Holt 3 Blackburn Road Sheffield S61 2DW
T: 0114 2669292 www.ecusltd.co.uk

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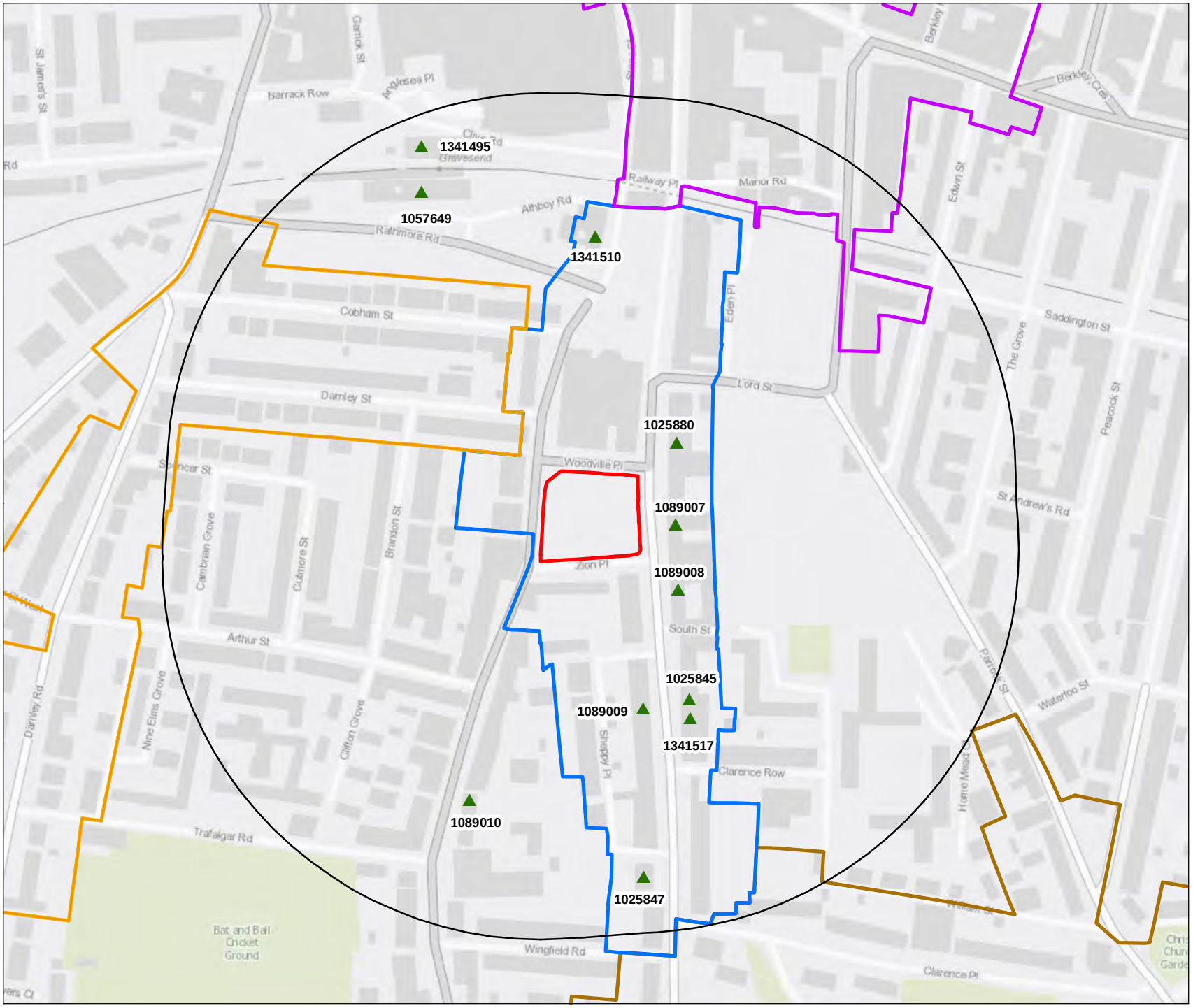
February 2022 | Scale: As shown @ A4 | Drg.Ref: ET/18582/01



ecus

KEY

- Site
- Study Area
- Grade II Listed Building

Conservation Areas:

- Darnley Road, Gravesend
- King Street, Gravesend
- Upper Windmill Street, Gravesend
- Windmill Hill, Gravesend

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Planning Issues

Former Police Station, 133 Windmill Street, Gravesend, DA12 1DB - Heritage Statement

Figure 2: Designated Heritage Assets

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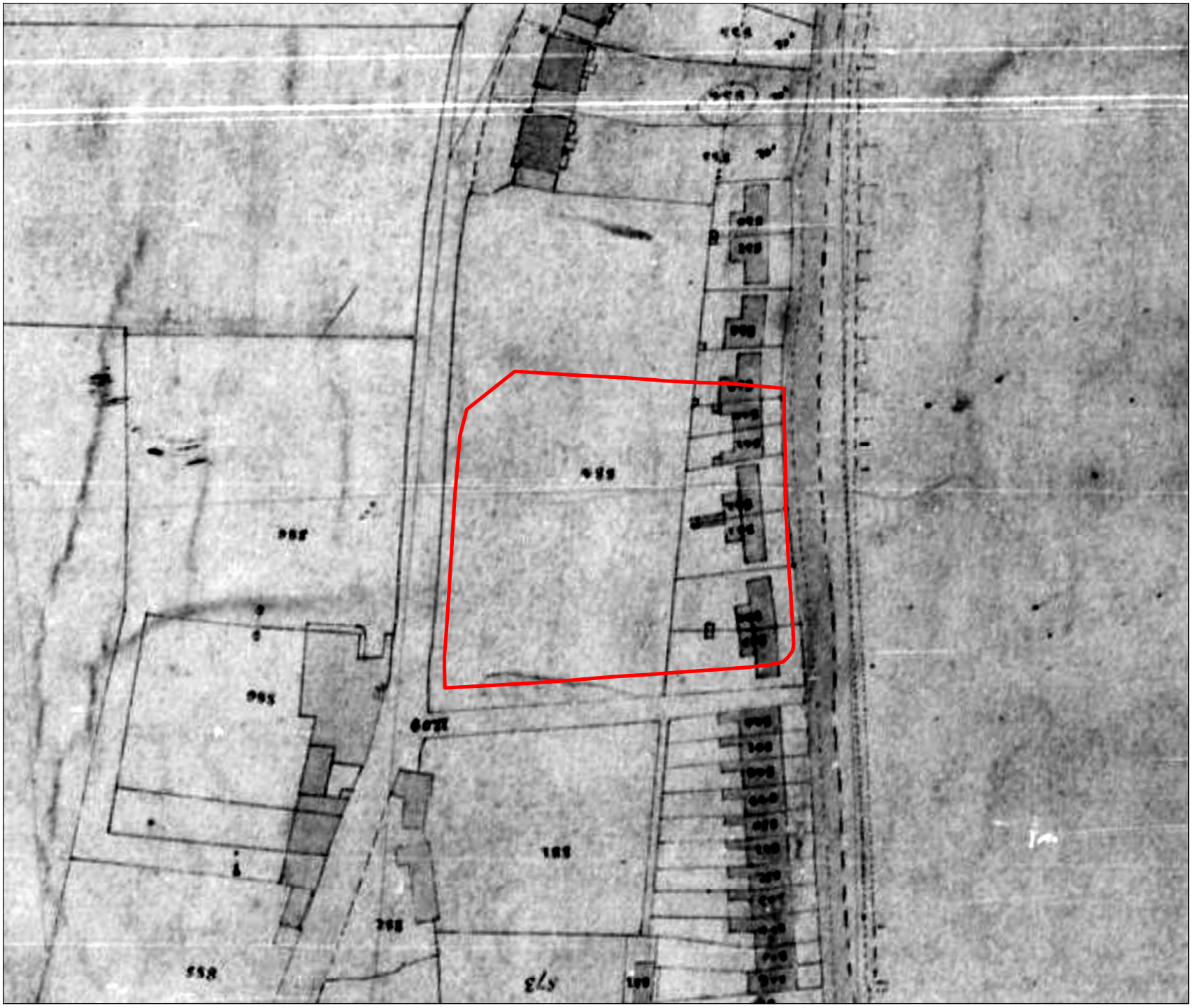

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Planning Issues

Former Police Station, 133 Windmill Street, Gravesend, DA12 1DB - Heritage Statement

Figure 3: Extract from the Parish of Gravesend Tithe Map 1841

Brook Holt 3 Blackburn Road Sheffield S61 2DW
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Appendix 1: Regulatory and Policy Context

Introduction

There is national legislation and guidance relating to the protection of, and development on, or near, important archaeological sites or historical buildings within planning regulations as defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system. The following policies are considered to be of relevance to the Site and the proposed redevelopment.

Planning (Listed Buildings and Conservation Areas) Act 1990

Works affecting Listed Buildings or structures and Conservation Areas are subject to additional planning controls administered by LPAs under the Planning (Listed Buildings and Conservation Areas) Act 1990. In considering development which affects a Listed Building or its setting, the LPA 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 (Section 66). In considering Conservation Areas the planning authority has a general duty to give special attention to the desirability of preserving or enhancing the character or appearance of that area (Section 72).

The statutory criteria for listing are the special architectural or historic interest of a building. Buildings on the list are graded to reflect their relative architectural and historic interest (DCMS, 2010a, para 7, page 4):

- Grade I: Buildings of exceptional interest;
- Grade II*: Particularly important buildings of more than special interest;
- Grade II: Buildings of special interest which warrant every effort being made to preserve them.

Historic England is a statutory consultee in relation to works affecting Grade I/II* Listed Buildings.

National Planning Policy Framework

Section 16 of the National Planning Policy Framework (NPPF) sets out the Government's current planning policy in relation to conserving and enhancing the historic environment. The key requirements are summarised below.

Applicants are required to provide proportionate information on the significance of designated and non-designated heritage assets affected by the proposals and an impact assessment of the proposed development on that significance. This should be in the form of a desk-based assessment and, where necessary, a field evaluation (NPPF, 194).

LPAs are required to take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place (NPPF, 190/197).

In determining planning applications, great weight should be given to the conservation of designated heritage assets - World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas designated under the relevant legislation (NPPF,

199/200).

In weighing applications that affect directly or indirectly the significance of a non-designated heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (NPPF, 203).

LPAs 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 significance and the impact, and to make this evidence publicly accessible and any archives deposited with a local museum or other public depository (NPPF, 205).

Local Plan

The Site is situated within the administrative boundary of Gravesham Borough Council (GBC). Relevant local planning policy is outlined in the Local Plan Core Strategy (adopted 2014) and Policies Map, Local Plan First Review – Saved Policies and Kent Minerals and Waste Local Plan. Policies relevant to this assessment comprise:

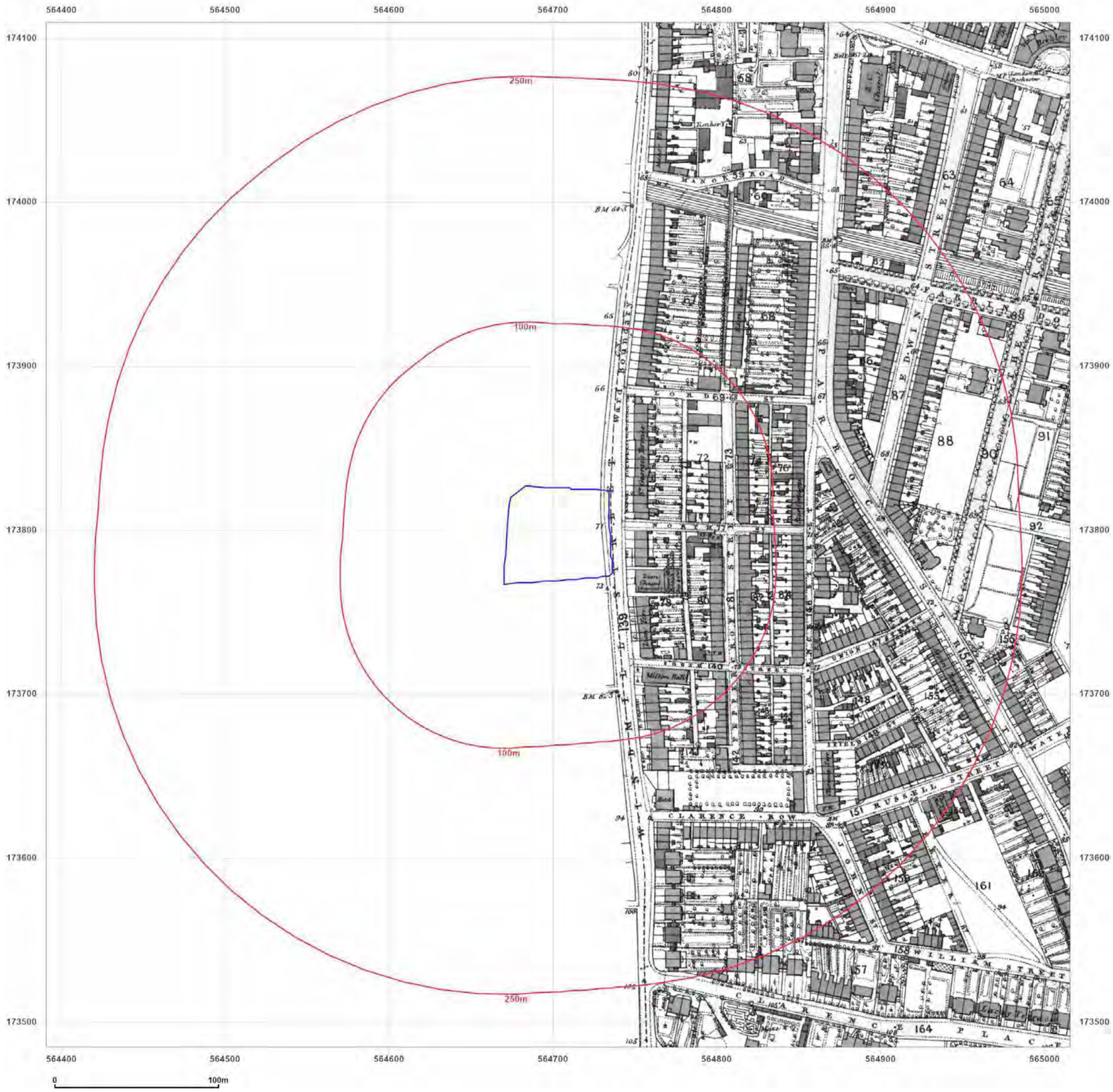
- Policy CS19: Development and Design Principles; and
- Policy CS20: Heritage and Historic Environment in the Local Plan Core Strategy.

Appendix 2: Gazetteer

Table 3. Gazetteer of Designated Heritage Assets

NHLE	Name	Designation	Easting	Northing
1025845	68 And 69, Windmill Street	Grade II Listed Building	564768	173676
1025847	109 And 110, Windmill Street	Grade II Listed Building	564738	173558
1025880	St George's Terrace	Grade II Listed Building	564759	173845
1057649	Gravesend Railway Station (Up Side)	Grade II Listed Building	564591	174011
1089007	51-54, Windmill Street	Grade II Listed Building	564759	173791
1089008	55-59, Windmill Street	Grade II Listed Building	564761	173748
1089009	123-126, Windmill Street	Grade II Listed Building	564737	173670
1089010	62 And 64, Wrotham Road	Grade II Listed Building	564622	173609
1341495	Gravesend Railway Station (Downside)	Grade II Listed Building	564591	174042
1341510	20-24, Stone Street	Grade II Listed Building	564705	173982
1341517	70 And 71, Windmill Street	Grade II Listed Building	564768	173663
	Windmill Hill, Gravesend	Conservation Area	564954	173369
	Upper Windmill Street, Gravesend	Conservation Area	564728	173773
	Darnley Road, Gravesend	Conservation Area	564375	173652
	King Street, Gravesend	Conservation Area	564857	174090

Appendix 3: Ordnance Survey Mapping



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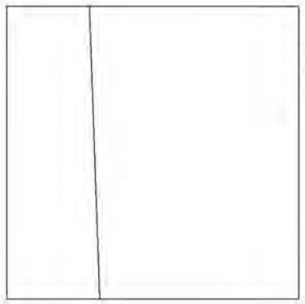

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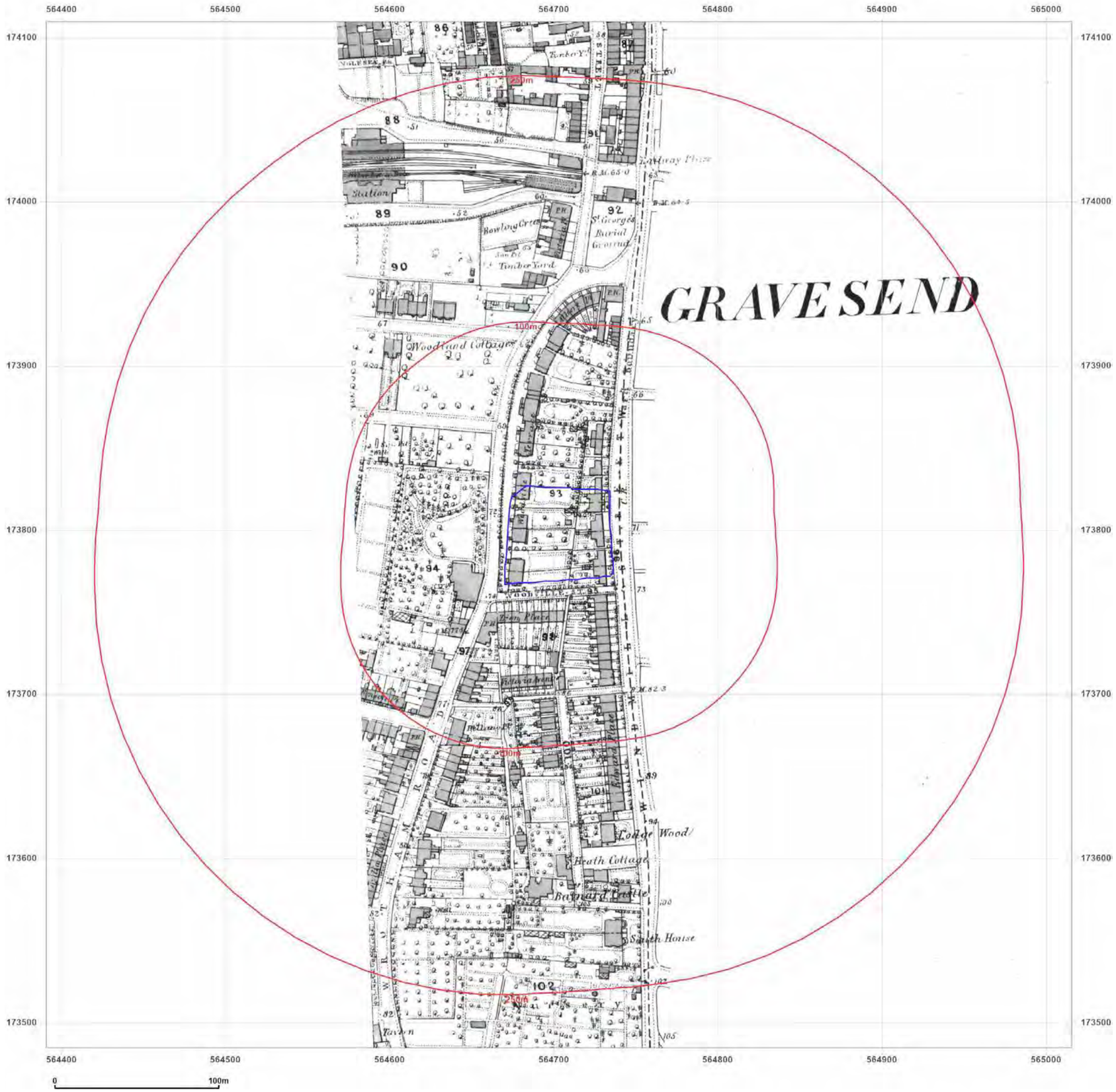

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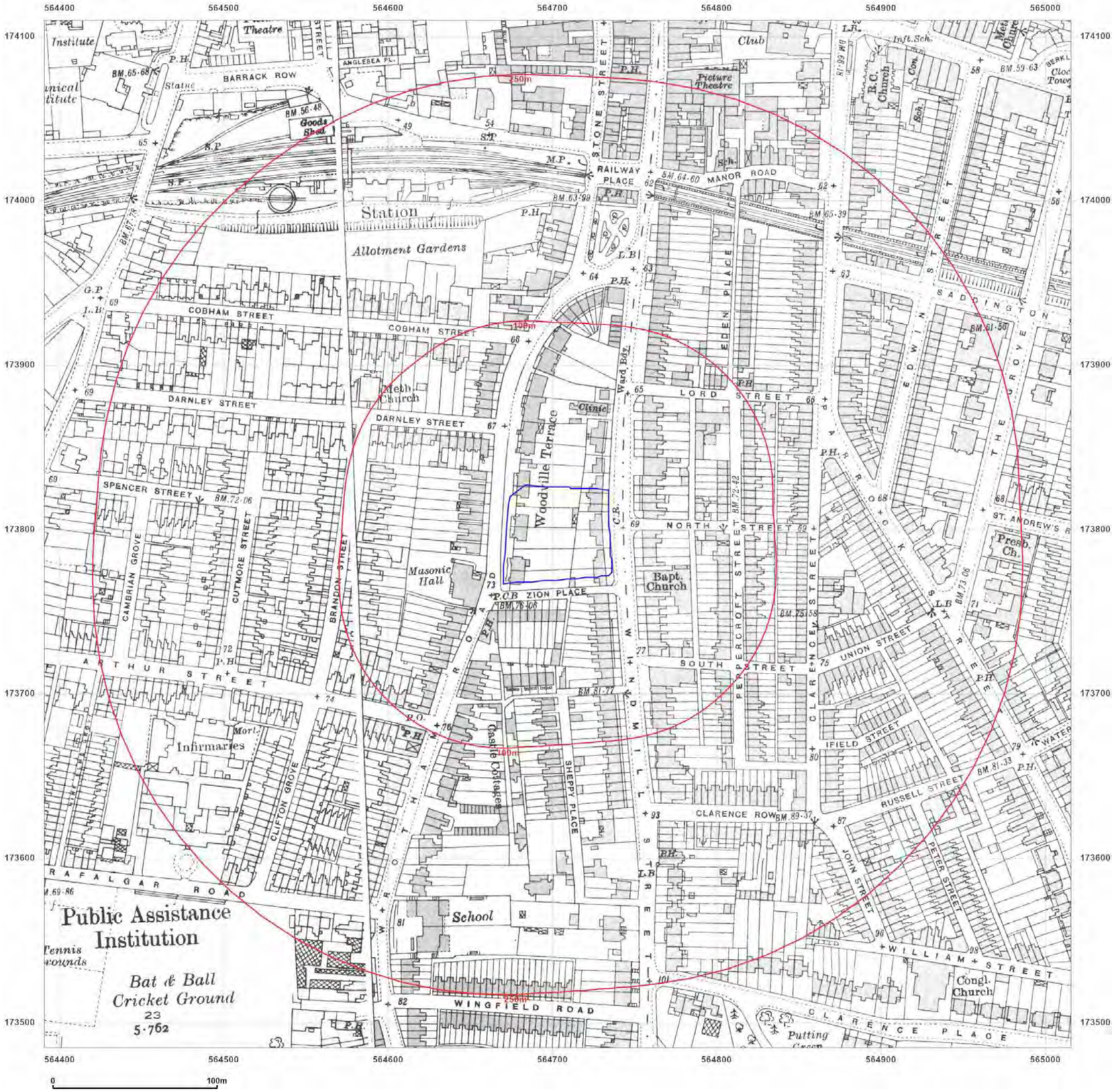
www.groundsure.com/sites/default/files/groundsure_legend.pdf



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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: County Series

Map date: **1932-1933**

Scale: 1:2,500

Printed at: 1:2,500

N
W E
S

Surveyed 1933
Revised 1933
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1932
Revised 1932
Edition N/A
Copyright N/A
Levelled N/A

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: National Grid

Map date: **1955-1958**

Scale: 1:2,500

Printed at: 1:2,500

N
W E
S

Surveyed 1953
Revised 1953
Edition 1955
Copyright N/A
Levelled 1952

Surveyed 1953
Revised 1953
Edition 1958
Copyright N/A
Levelled 1952

Surveyed 1953
Revised 1953
Edition 1955
Copyright N/A
Levelled 1952

Surveyed 1953
Revised 1953
Edition 1955
Copyright N/A
Levelled 1954

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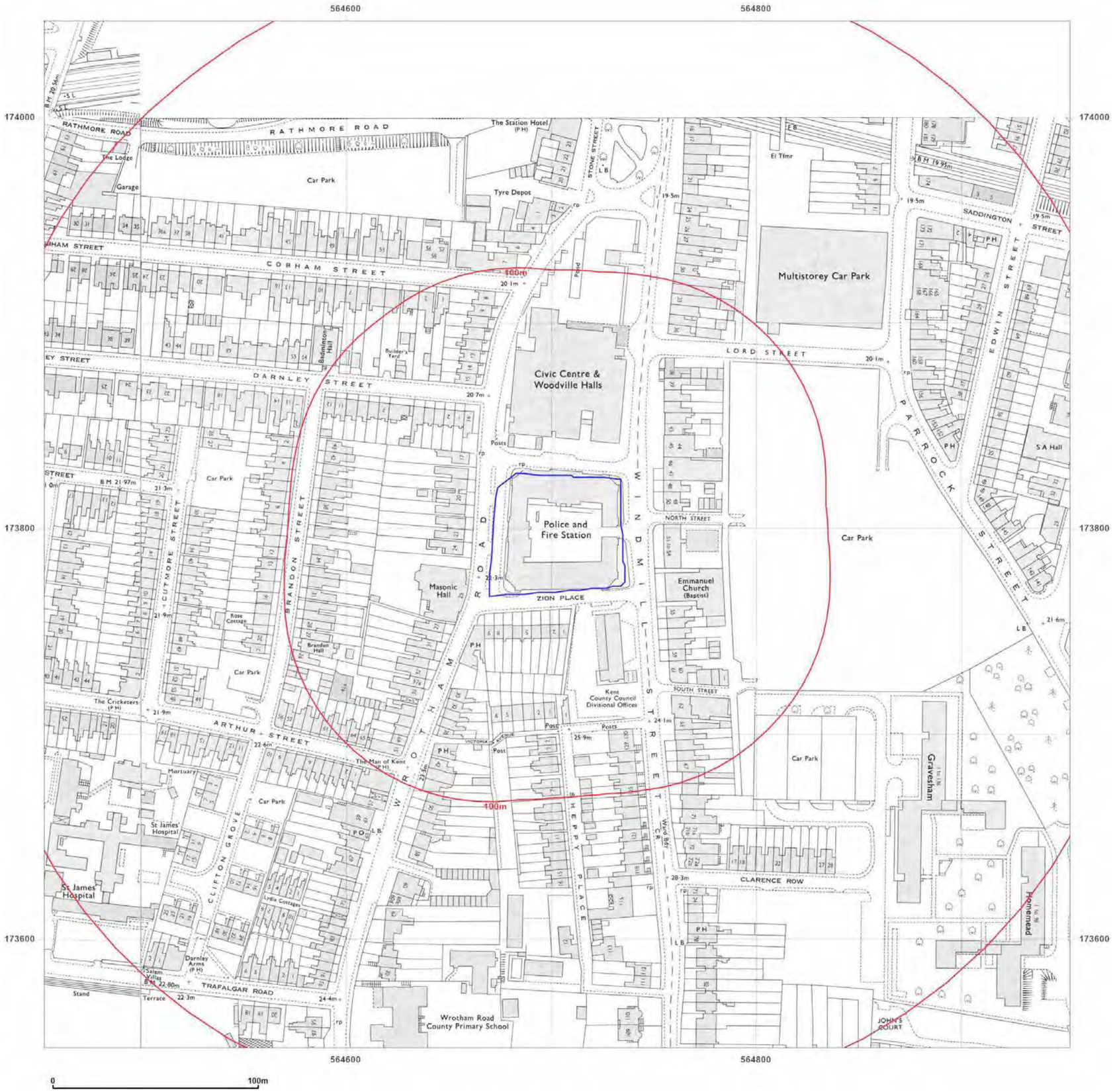

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: National Grid

Map date: **1972-1975**

Scale: 1:1,250

Printed at: 1:2,000

N
W E
S

Surveyed 1953
Revised 1974
Edition N/A
Copyright 1975
Levelled 1956

Surveyed 1953
Revised 1973
Edition N/A
Copyright 1974
Levelled 1952

Surveyed 1953
Revised 1972
Edition N/A
Copyright 1972
Levelled 1952

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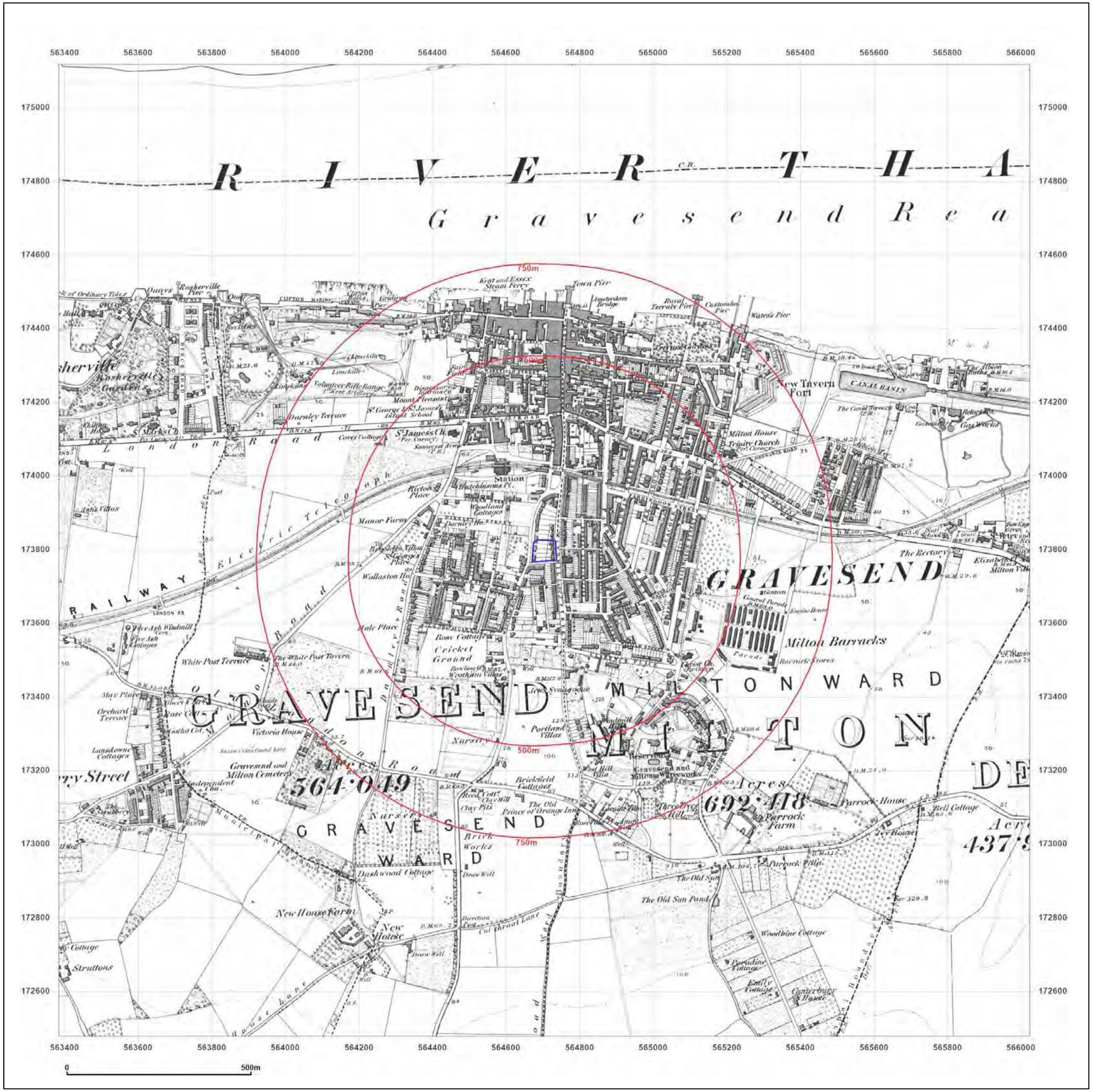

emapsite™

Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: County Series

Map date: **1865**

Scale: 1:10,560

Printed at: 1:10,560

N
W E
S

Surveyed 1865
Revised 1865
Edition N/A
Copyright N/A
Levelled N/A

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: County Series

Map date: **1895-1899**

Scale: 1:10,560

Printed at: 1:10,560

N
W E
S

Surveyed 1864
Revised 1895
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1866
Revised 1895
Edition N/A
Copyright N/A
Levelled N/A

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Map legend available at:
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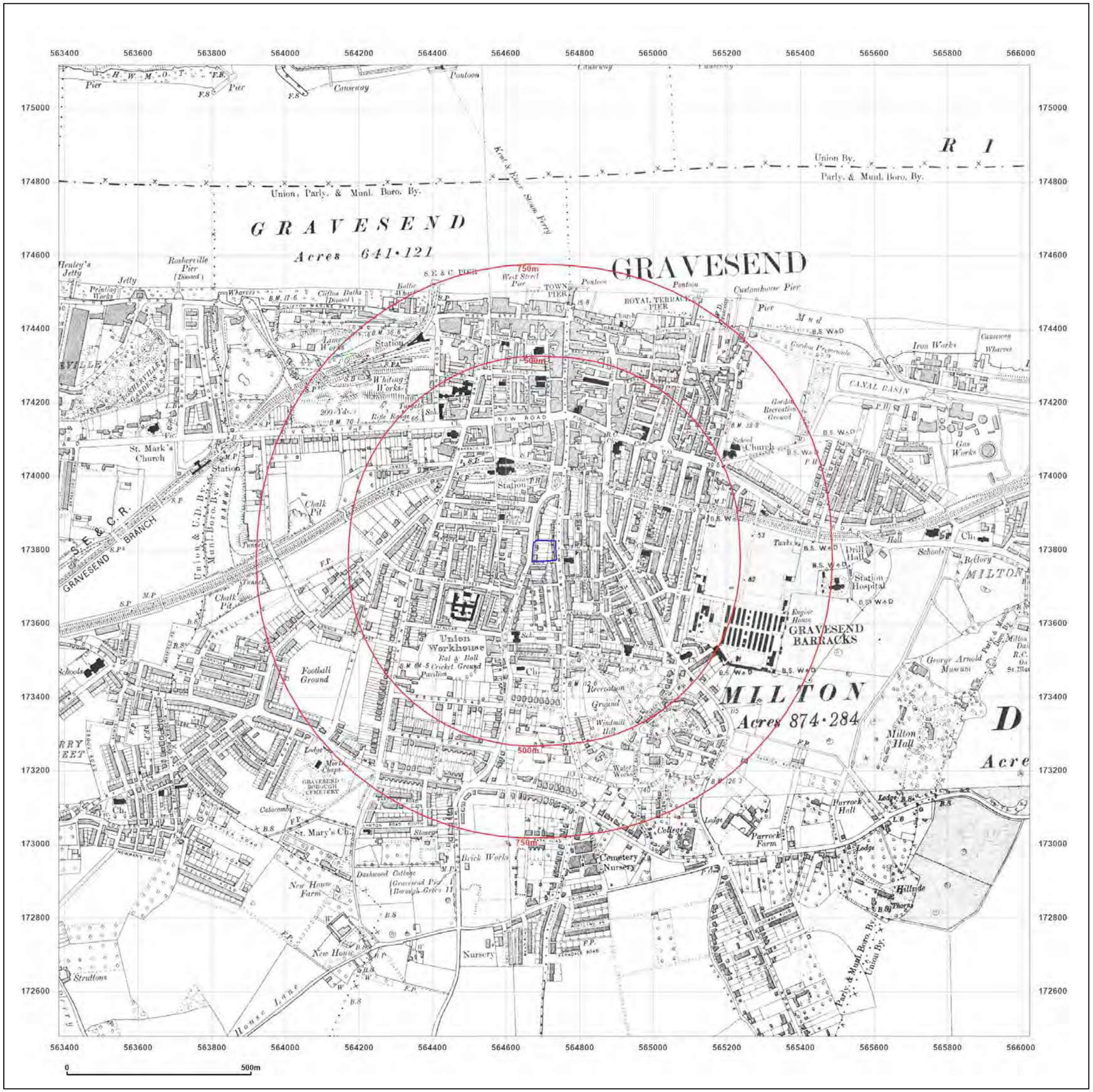

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: County Series

Map date: **1907**

Scale: 1:10,560

Printed at: 1:10,560

N
W E
S

Surveyed 1864
Revised 1907
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1863
Revised 1907
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1864
Revised 1907
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1862
Revised 1907
Edition N/A
Copyright N/A
Levelled N/A

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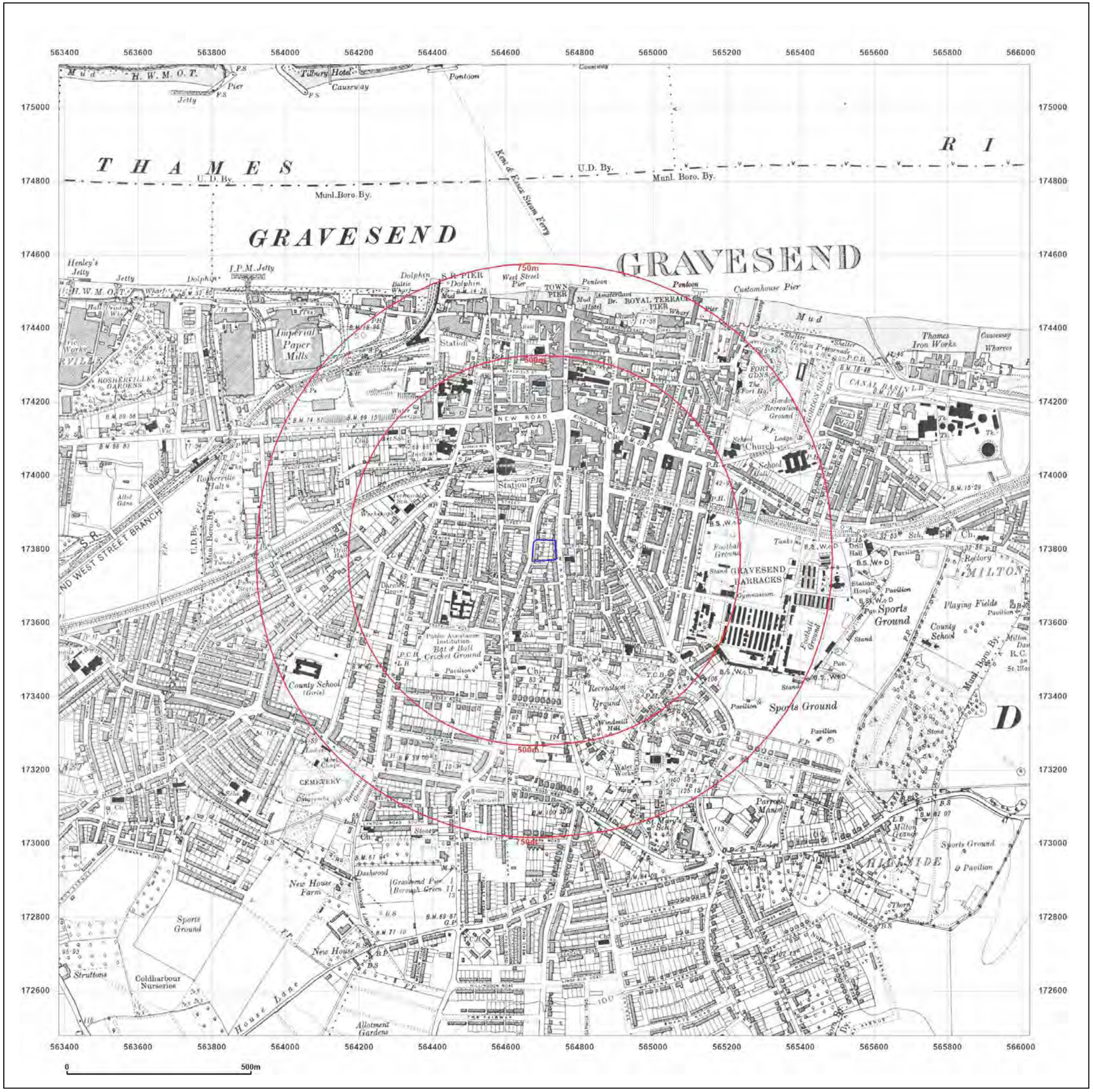

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: County Series

Map date: **1931-1932**

Scale: 1:10,560

Printed at: 1:10,560

N
W E
S

Surveyed 1864
Revised 1932
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1863
Revised 1932
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1864
Revised 1931
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1862
Revised 1932
Edition N/A
Copyright N/A
Levelled N/A

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: Provisional

Map date: **1955**

Scale: 1:10,560

Printed at: 1:10,560

N
W E
S

Surveyed 1864
Revised 1955
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1864
Revised 1955
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1864
Revised 1955
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1863
Revised 1955
Edition N/A
Copyright N/A
Levelled N/A

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Site Details:

Client Ref: EMS_762508_987127
Report Ref: EMS-762508_987127
Grid Ref: 564703, 173797

Map Name: National Grid

Map date: **1971-1973**

Scale: 1:10,000

Printed at: 1:10,000

N
W E
S

Surveyed 1973
Revised 1973
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1972
Revised 1973
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1971
Revised 1971
Edition N/A
Copyright N/A
Levelled N/A

Surveyed 1973
Revised 1973
Edition N/A
Copyright N/A
Levelled N/A

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