

Gravesend Borough Council

HERITAGE STATEMENT GRFC BOWLS CLUB, GRAVESEND

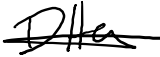
Quality Assurance

Site name: GEFC Bowls Club,
Church Walk
Gravesend
DA12 2QU

Client name: McCarthy and Stone Ltd

Type of report: Heritage Statement

Prepared by: Daniele Haynes BA(Hons) MSc

Signed: 

Date: 7th October 2022

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Signed: 

Date: 28th October 2022



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1.0 Introduction

- 1.1 This Heritage Statement has been prepared on behalf of McCarthy and Stone to accompany an application relating to the re-development of the GRFC Bowls Club, Gravesend, hereafter called 'the site'.
- 1.2 The site is located approximately 1.1km to the east of Gravesend Station on the junction of Church Road, Milton Road and Ellerslie. The site does not contain any buildings or structures included on the Statutory List of Buildings of Special Architectural or Historic Interest. However, it is in proximity to a number of designated assets including the Church of St Peter and St Paul (Grade II*).
- 1.3 This Heritage Statement includes a Significance Assessment which identifies the relative heritage value of the assets which may be affected by proposals to develop the site and an Impact Assessment to consider the effect of the proposals on that significance. This approach is required in order to satisfy the provisions of section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF, 2021) where the assessment of heritage assets or their settings is being considered (paragraphs 194,195 and 199-207).

Authorship

- 1.4 The document has been prepared by Daniele Haynes BA(Hons) MSc (Senior Heritage Consultant) and reviewed by Chris Surfleet MA MSc PGDipUD IHBC(Partner, Head of Heritage).

2.0 Heritage Legislation, Policy and Guidance Summary

National Policy

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states *“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
 - Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
 - In relation to Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
- 2.2 As the proposals do not involve direct alterations to a listed building, Section 16 does not apply. Also, as the proposals are not within a Conservation Area, Section 72 does not apply.

National Planning Policy Framework (2021)

- 2.3 The revised National Planning Policy Framework (NPPF) was published on 20th July 2021, replacing the previously-published 2012, 2018 and 2019 Frameworks. With regard to the historic environment, the overarching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.4 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 189).
- 2.5 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 194).
- 2.6 Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.



- 2.7 An addition to the 2021 NPPF is outlined in paragraph 198. This states that local planning authorities should have regard to the importance of the retention ‘*in-situ*’ of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.
- 2.8 Paragraph 199 requires that “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*”
- 2.9 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “*clear and convincing justification*” (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.
- 2.10 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:
- 2.11 “*Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a. the nature of the heritage asset prevents all reasonable uses of the site; and
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.”
- 2.12 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in “*less than substantial harm*”, paragraph 202 provides the following:
- 2.13 “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.*”
- 2.14 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.15 In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.16 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

- 2.17 With regard to Conservation Areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*
- 2.18 Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create ‘beautiful and distinctive places’ (paragraph 127).
- 2.19 Paragraph 134 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings’.

Planning Practice Guidance (PPG) (2021)

- 2.20 The Planning Practice Guidance (PPG) was updated on 24 June 2021 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. It is planned that this document will be updated to reflect the revised NPPF in due course however the following guidance remains relevant.
- 2.21 In relation to the possibility of harm of a proposal on the significance of a heritage asset, the PPG explains the following:
“Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework apply..” (Paragraph: 018 Reference ID: 18a-018-20190723)
- 2.22 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “high test”.

Historic England ‘Conservation Principles: Policies and Guidance’ 2008



- 2.23 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment, including changes affecting significant places. The guide sets out six high-level principles:
- *“The historic environment is a shared resource*
 - *Everyone should be able to participate in sustaining the historic environment*
 - *Understanding the significance of places is vital*
 - *Significant places should be managed to sustain their values*
 - *Decisions about change must be reasonable, transparent and consistent*
 - *Documenting and learning from decisions is essential”*
- 2.24 ‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:
- ***“Evidential value: the potential of a place to yield evidence about past human activity***
 - ***Historic value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.***
 - ***Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place***
 - ***Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory”.***
- 2.25 It states that:
- “New work or alteration to a significant place should normally be acceptable if:*
- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
 - b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*
 - c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*
 - d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)”.*

Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)

- 2.26 This document provides advice in relation to aspects of addition and alteration to heritage assets:
- “The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).*

Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)

- 2.27 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness”* (para 1).
- 2.28 Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”*.

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.29 This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.30 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning (Second Edition) Note 3 (December 2017)

- 2.31 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.
- 2.32 Page 2, states that *“the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”*
- 2.33 The document goes on to set out ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the

following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- “Step 1 - identify which heritage assets and their settings are affected;
- Step 2 - Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4 - explore ways to maximise enhancement and avoid or minimizing harm;
- Step 5 - make and document the decision and monitor outcomes.” (page 8)

Local Policy

Gravesham Local Plan Core Strategy (2014)

2.34

The Core Strategy sets out the Council's long term special vision for the Borough for the period from 1st April 2011 until 31st March 2028. The document was formally adopted by the Council in September 2014 and contains the following relevant policy:

CS20: Heritage and the Historic Environment

The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include:

- *Gravesend Town Centre, its development as a heritage riverside town, and its setting;*
- *The Borough's urban and rural conservation areas; and*
- *Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.*

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as *“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”* (NPPF Annex 2: Glossary).
- 3.2 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.3 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that *“non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”* (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.4 However, the PPG goes on to clarify that *“a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”*

Meaning of Significance

- 3.5 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the *“aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups”* (Page 2, Article 1.2)
- 3.6 The NPPF (Annex 2: Glossary) also defines significance as *“the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*
- 3.7 The British Standards BS7913 (2013) notes that *“the attributes that combine to define the significance of a historic building can relate to its physical properties or to its context. There are many different ways in which heritage values can be assessed.”*
- 3.8 Significance can therefore be considered to be formed by a collection of values.

Assessment of Significance

- 3.9 It is important to be *“proportionate”* in assessing significance as required in both national policy and guidance as set out in paragraph 194 of the NPPF.

3.10 The Historic England document ‘Conservation Principles’ states that “*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*”

3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other assets sharing similar values;
- Articulate the significance of the asset.

3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset’s significance. Historic England’s ‘*Conservation Principles*’ sets out a grouping of values as follows:

Evidential value – ‘*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*’ (Page 28)

Aesthetic Value – ‘*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive.*’ (Pages 30-31)

Historic Value – ‘*derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.*’ (Pages 28-30)

Communal Value – “*Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is*

generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there”. (Pages 31-32)

- 3.13 Historic England advice Note 12 notes that *“interest may be archeological, architectural, artistic or historic”*.
- 3.14 The British Standards set out a simpler approach which *“is to think of a historic building’s significance as comprising individual heritage values”*. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.
- 3.15 It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

- 3.16 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that ‘setting’ itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.17 Historic England’s Conservation Principles defines *setting* as *“an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
- 3.18 It goes on to state that *“context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places”* (page 39).
- 3.19 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.20 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.21 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.
- 3.22 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established ‘James Semple Kerr method’

which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

- 3.23 The first stage of our approach is to carry out a thoroughly-researched assessment of the significance of the heritage asset, in order to understand its value:

Table 1 Assessment of Significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

- 3.24 Once the value/significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. Table 2 sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.
- 3.25 An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).
- 3.26 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Table 2 Assessment of Sensitivity

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

- 3.27 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Table 3 Assessment of Impact

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction. Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.
High	Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood. Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation

	and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.
Medium	Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised. Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.
Minor/Low	Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised. Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.
Negligible	Barely discernible effect on baseline conditions but a slight adverse or beneficial impact.
Neutral	A change or effect which is neither adverse nor beneficial in impact.
Nil	No change in baseline conditions.

Summary of Assessment

- 3.28 Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is *“proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”* as set out in Paragraph 194 of the National Planning Policy Framework.

Recent appeals

- 3.29 A proposed development can have both positive and negative impacts upon a heritage asset. Recent High Court rulings demonstrate the importance on the identification of heritage benefits against the heritage harms of proposals.
- 3.30 In the R (Palmer) v Herefordshire Council ([2016] EWCA Civ 1061 case, Lord Justice Lewison concluded that *“the decision maker may legitimately conclude that although each of the effects has an impact, taken together there is no overall adverse effect on the listed building or its setting.”*
- 3.31 This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors* [2021] EWCA Civ 320. In this case Lord Justice Lindblom concluded that *“the considerable importance and weight to the desirability of*

preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm, and the conflict with policy, should be a product of these factors”

- 3.32 In both of these cases, it is clear that, when assessing the impact of a proposal, the heritage benefits and heritage harms do have individual impacts upon an asset's significance. However, when taken together, the proposals could legitimately be considered not to have an adverse overall impact on the significance of the asset.

Research Methodology

- 3.33 This Heritage Statement is the result of a robust process which assesses relevant documentary research (including maps, drawings and reports, as well as, archive material where relevant) and professional judgement.
- 3.34 A site visit for the GRFC Bowls Club was undertaken in August 2022.

4.0 Historic Context

Map Regression

- 4.1 A comprehensive assessment of a selection of available historic maps has been undertaken to assist in the understanding of the site. Although such information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable, particularly the later Ordnance Survey (OS) Maps, and taken together with written archival data and the physical evidence can help to refine the history of a site. The indicative site location is shown in red on each map.
- 4.2 For much of its history the site was in agricultural use. The tithe map of 1840 below shows that historically the site formed part of Parrock Farm, the farmhouse of which was sited to the south of the site. The associated apportionment also notes that at the time the site was in arable use.



Figure 1 Extract from the Tithe map of 1840 with the approximate location of the site marked in red

- 4.3 The historic mapping from the 19th century shows the site remained undeveloped throughout the century. The maps, however, do show the development of the area around the site with the introduction of the railway first shown on the 1869 map as was a national school to the north of the site and a number of residential properties built along Milton Road.

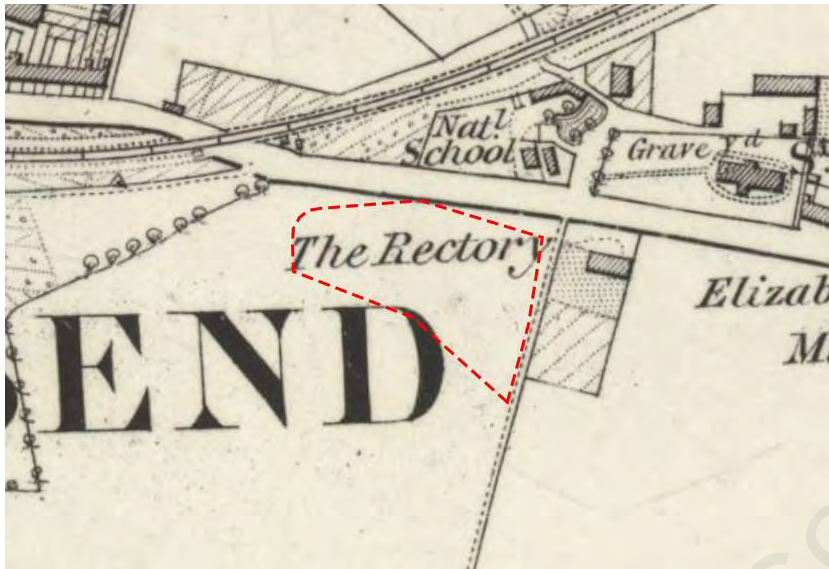


Figure 2 Extract from the OS Map of 1869 with the approximate location of the site marked in red. The site continues to be undeveloped but here the railway and national school can be seen.

- 4.4 Milton Barracks were constructed to the west of the site in 1862, positioned near to the developed area of the town. By 1899, the barracks had expanded with a Drill Hall positioned on Milton Road to the east of which was the Station Hospital. The site remained undeveloped, however.

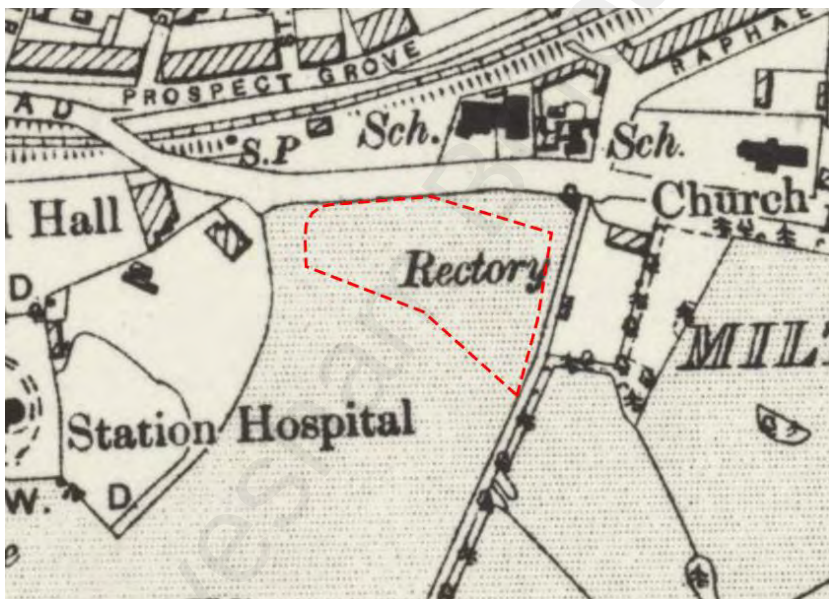


Figure 3 Extract from the OS Map of 1899 with the approximate location of the site marked in red. To the west of the site the Milton Barracks Drill Hall can be seen as can the Station Hospital

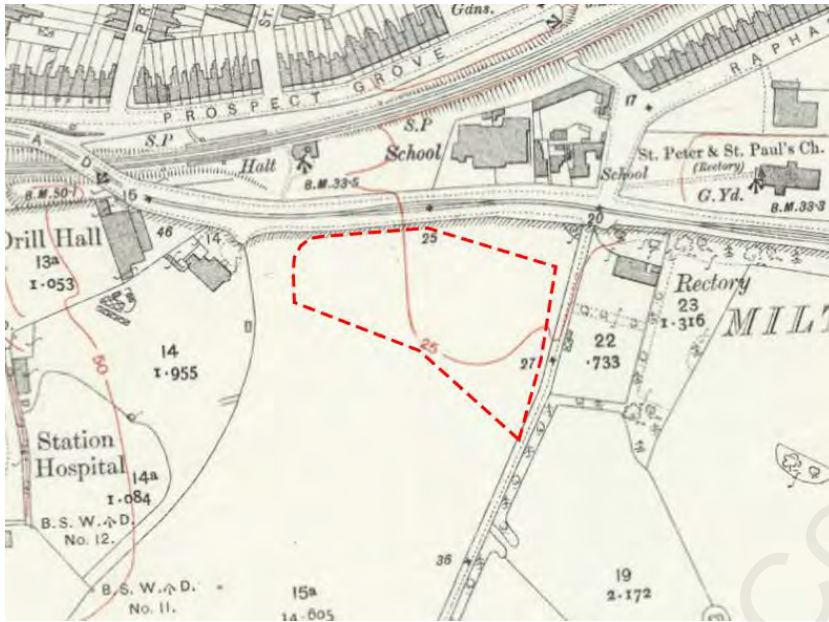


Figure 4 Extract from the OS Map of 1909 with the approximate location of the site marked in red. Around the site numerous new dwellings have been added around the site however, the site remains undeveloped.

- 4.5 A bowls club is first shown on the 1933 OS map below with the site now containing a small pavilion and a bowling green. The land to the south is also shown as a sports ground.

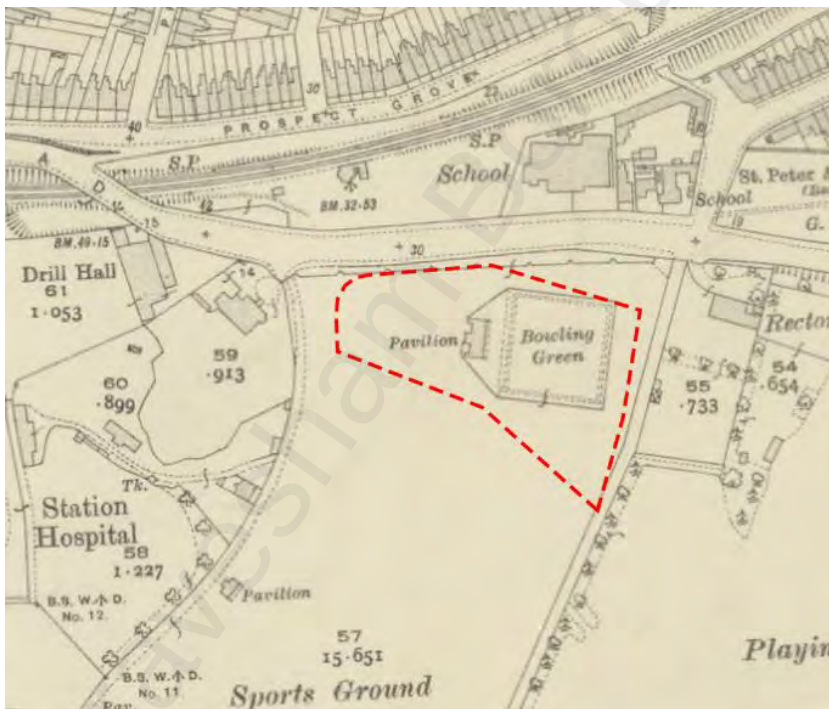


Figure 5 Extract from the OS Map of 1933 with the site boundaries marked in red. The bowls club is first shown on the site.

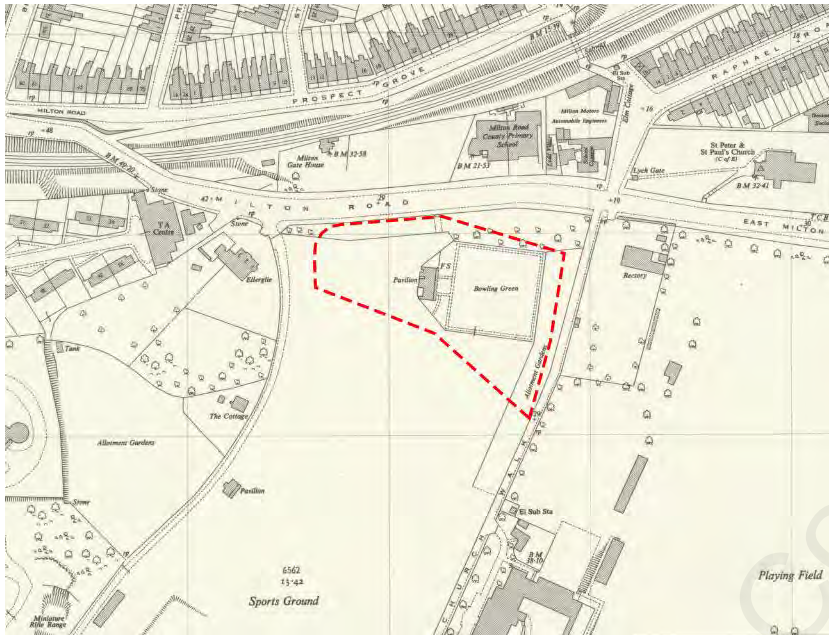


Figure 6 Extract from the OS Map of 1955 with the site boundaries marked in red. There is little change to the site at this time. To the south-east, the Gravesend School for Boys is first shown.

- 4.6 Milton Barracks was closed in 1967 following the departure of the 1st Battalion, the Welsh Regiment. Subsequently, the barracks were sold to Kent County Council who developed part of it for housing. This can be seen in the 1999 plan below with the creation of Copper Beech Close and Sycamore Close to the west of the site. The map also appears to show the widening of Ellerslie to accommodate the new residential area. The site itself shows little change.



Figure 7 Extract from the OS Map of 1992 with the site boundaries marked in red. The barracks directly to the west of the site had by this date been developed for housing. There is little change on the site.

- 4.7 The bowls club and pavilion have been vacant since around 2020.



Figure 8 Google Earth Aerial showing the site at the present day, 2022

5.0 Site Photographs

5.1 The following photographs provide record of the site as found during our site visit in August 2022.



Figure 9 View of the northern boundary of the site looking west along Milton Road



Figure 10 View of the existing Pavilion Building from the north



Figure 11 View of the Pavilion as seen from the south



Figure 12 View of the bowling green as seen from the south, the ground has clearly not been used or maintained for a long period of time



Figure 13 View of the southern boundary of the site



Figure 14 View of the site from the west



Figure 15 View of the site as seen from the west on the corner of Milton Road and Ellerslie



Figure 16 View of the eastern boundaries of the site

6.0 Heritage Assets

- 6.1 This section identifies heritage assets which surround the development site. In the case of this application, the following heritage assets are local to the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with '**Step 1**' of the GPA3 The Setting of Heritage Assets.
- 6.2 Although there are numerous assets within the wider surrounding area, the scale of the works coupled with their location and significance results in many of them having no perceptible relationship with site. For this reason, only the heritage assets which may be considered to be affected by the proposed development have been identified for the purposes of detailed assessment.
- 6.3 In the case of this application, the following designated heritage assets have been identified as they may be affected by the current proposals:
1. Church of St Peter and St Paul – Grade II* Listed Building
 2. Milton War Memorial – Grade II Listed Structure



Figure 17 Aerial showing the location of the assets discussed within this report

- 6.4 The relevant Statutory List Descriptions can be found within Appendix 1.
- 6.5 The existing clubhouse has not been identified by the Local Planning Authority as a non-designated heritage asset, and it is considered that it does not hold sufficient local interest to warrant this status.

7.0 Significance Assessment

Church of St Peter and St Paul – Grade II* Listed Building



Figure 18 View of the Church of St Peter and St Paul as seen from the south-east

- 7.1 The Church of St Peter and St Paul was first added to the Statutory List of Buildings of Special Architectural or Historic Interest on the 23rd January 1952, at Grade II*.
- 7.2 The building was constructed as and remains in use as a parish church. Its public use ensures that it forms a centre of the local community and is readily appreciable internally and externally.
- 7.3 There is written evidence of a church at Milton-next-Gravesend which dates to 975AD in the Textus Roffensis, suggesting that the church has Anglo-Saxon origin. The church is again referenced in the Domesday book of 1089. However, no clear evidence of this early building survives above ground.
- 7.4 The existing structure primarily dates to the 14th and 15th centuries. It is in the perpendicular style and its plan is a linked chancel and nave built of stone rubble and flint with stone dressings. The south porch is formed of striped stone and knapped flint layers with a stone four centred arched doorway and a projecting stone cornice above. A brick repair is visible near to the top of the structure. The west tower dates to the late 14th or early 15th century and is in four stages with an embattled parapet.
- 7.5 The building underwent restoration works in the 18th century. This included the nave roof added in the late 18th century and is a shallow gable-ended structure with deep eaves on paired brackets. The eastern gable end is designed to appear as a pediment, near to the top is an oculus which is now blocked. There are also a number of 19th century alterations to the building including the reconstruction of the west gallery and addition of the north gallery within the

building. A number of the windows of the building also are of a 19th century date, although there are some surviving medieval windows as well.

- 7.6 Internally, the church is finished with decorative features dating to the 18th, 19th and 20th centuries. However, there are also surviving medieval features such as the rib-vaulted sedilia and piscina as well as bosses and carved stone corbels.
- 7.7 Overall, the Church of St Peter and St Paul is considered to hold a **good/high** level of significance as a medieval parish church which retains a great deal of medieval, 18th and 19th century fabric.

Setting

- 7.8 The immediate setting of the church is formed by its associated churchyard containing numerous gravestones and funerary monuments. The church and churchyard are on a higher ground level than the adjacent public highways and, as such, the boundary of the churchyard is a retaining wall. This high ground level and low boundary wall ensure that the church itself is a dominant feature of the local streetscape and helps to enhance the contrast between the more tranquil spaces within the churchyard and the surrounding area.
- 7.9 The prominence of the church is clearer in views directly to the south where the churchyard is open to Milton Road and the change in the ground level is at its greatest. In contrast, the western half of the churchyard is filled with mature trees that create a more private and enclosed space and allow for only limited views of the church. The sense of privacy and enclosure in the west of the churchyard is further emphasised by the presence of a lychgate and further gated pathway into these areas.



Figure 19 View of the western half of the churchyard. Here, the church's setting has an enclosed and green character



Figure 20 View of the Church from the west



Figure 21 The eastern half of the churchyard is more open allowing clear views of the church to be had



Figure 22 In views from the west, the church is mostly concealed by mature trees but the tower can be seen and this element is emphasized by the green character of its setting

7.10 Beyond the churchyard, the building is experienced within a green and generally suburban context. Residential buildings are positioned close to the boundary of the churchyard in the north and east, creating a sense of enclosure and limiting views of the building in these directions. To the south, mature trees along the Milton Road also add to the green character of the church's setting and frame the approach towards it - particularly from the west along Milton Road. Beyond the trees, the open green spaces of the Gravesend RFC's playing fields and the sports fields of Gravesend Grammar School can just be glimpsed through the mature vegetation on the back of the pavement and around the built form on the south side of Milton Road, adding to the greened character of the area and hinting at the open fields which historically were found to the south of the church.

7.11 Overall, the setting of the Church of St Peter and St Paul ensures that the building is understood to form a parish church within a suburban and green context. At its strongest, within the churchyard and immediate vicinity, the setting of the church is moderate/good beneficial. At greater distance, the setting is more varied in quality and the church is not experienced so directly, making only a **minor beneficial** contribution.

Contribution of the site to setting

7.12 The site is located approximately 112m to the south-west of the church. The presence of trees within the churchyard and around the north and eastern boundaries of the site results in there being no direct inter-visibility between the site and much of the church. However, a small part of the church tower can be glimpsed above the trees in views looking across the site from the south and south-west. The mature trees along the north and eastern boundaries of the site do add to the greened character of the church's wider setting and to the approach to it along Milton Road from the west. As such, the landscaped qualities of the site are considered to make a **minor beneficial** contribution to the church's setting.



Figure 23 View of the church from the north side of Ellerslie. The top of the tower can be glimpsed above the trees, marked by the red arrow



Figure 24 Views of the church reduce as you move southwards down Ellerslie. At the junction of Ellerslie and Donald Biggs Drive, the weathervane of the church can just be glimpsed over the trees, marked by the red arrow

Milton War Memorial – Grade II Listed Structure



Figure 25 View of the Milton War Memorial as seen from within the churchyard

- 7.13 The Milton War Memorial was first added to the Statutory List of Buildings of Special Architectural or Historic Interest on the 10th February 2017, at Grade II.
- 7.14 The war memorial was unveiled in April 1923 to commemorate the 116 local servicemen who died during the First World War. It was built by Messrs Swift Bros and was unveiled by local councillor W.E. Thomas who was mayor of Gravesend between 1921 and 1922.
- 7.15 The monument is a Portland stone built Latin cross with a square riser and a moulded stone base. On each face of the base is a raised stone plaque inscribed with the names of the fallen servicemen. The base is also inscribed with a dedication.
- 7.16 The war memorial is publicly accessible and visible from Milton Road, ensuring that it is easily appreciable. It is also a memorial to local men and demonstrates the impact of the First World War on the community of Milton-next-Gravesend.
- 7.17 As a result of the monument's connection to the local community, and to the First World War, the memorial is considered to hold a **moderate/good** level of significance.

Setting

- 7.18 The Milton War Memorial is located in the south-west of the churchyard of St Peter and St Paul's Church ensuring it is experienced in an appropriate environment. Around the war memorial, the churchyard contains numerous mature trees creating a sense of enclosure and tranquillity around the structure.
- 7.19 The monument is located beside to the western approach to the Church of St Peter and St Paul within the churchyard which ensures that it would be seen by visitors approaching or leaving the church via this access. The east-west orientation of the monument further links the structure and the church building and ensures a clear visual connection between the two.
- 7.20 Beyond the churchyard, the area is suburban in its character. There is a break in the trees to the south of the structure which allows it to be glimpsed from Milton Road. However, the position of the monument away from the southern boundary of the churchyard works to disconnect the monument from the surrounding area and ensures that it is experienced as part of the churchyard.
- 7.21 Overall, the setting of the Milton War Memorial places the structure in a place of remembrance and connects the structure to the Church of St Peter and St Paul. As such, the setting is considered to make a **good** contribution to the structure's significance.

Contribution of the site to setting

- 7.22 The site is located just under 70m to the south-west of the war memorial and forms part of the monument's suburban wider setting. Intervening trees in the churchyard and around the site boundary results in there being limited intervisibility between the two. Therefore, the site is considered to make a **neutral** contribution to the setting of the War Memorial.

8.0 Proposed Scheme

- 8.1 The scheme seeks to remove the existing clubhouse building and bowling green on site and replace them with a development of 62 retirement apartments. There will be no element of care as part of this development.
- 8.2 The replacement building will be a single footprint development ranging in height between two and four storeys, and adopting an L-shaped plan. The building would be located in the north eastern corner of the site but will be set back from the boundaries with Milton Road and Church Walk. Parking provision for the development would be provided to the south and west of the building, with vehicular access into the site provided from Ellerslie. Around the building and parking spaces, the site would be landscaped providing a communal garden for the residents. As part of the landscaping design, the belt of mature trees along the northern boundary of the site (fronting Milton Road) would be retained with other trees and areas of planting created around the site.

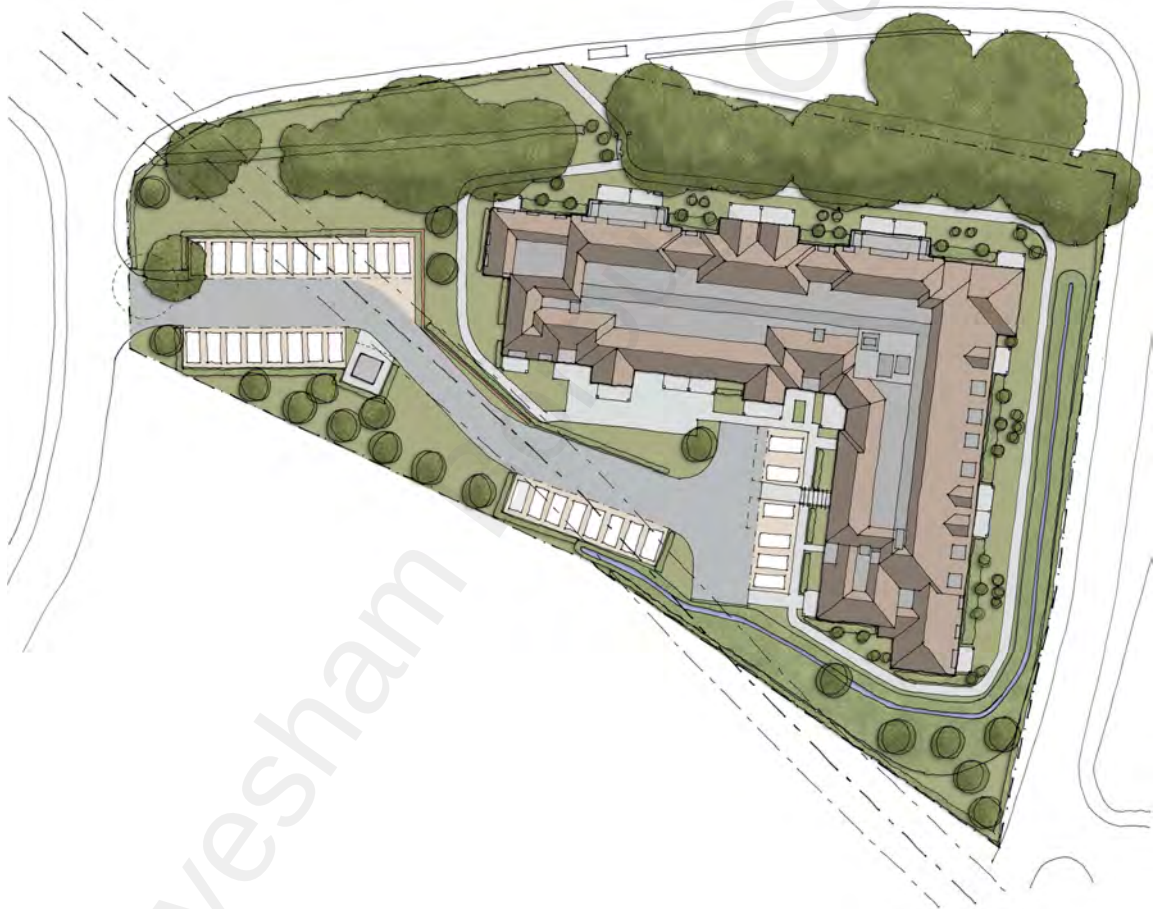


Figure 26 Proposed site plan

- 8.3 The proposed building would provide a mix of one and two bedroom units provided over three to four floors. At ground floor level, the building would contain a communal lounge and bistro with an associated kitchen. There would also be a staff office and residency, as well as storage for mobility equipment and bin storage.



- 8.4 The building's elevations will be varied and articulated with brick and render finishes, helping to create visual interest and soften the effect of mass and height. The eastern range of the building would be part three storey/part four storeys, with the lower aspect of the range on the eastern elevation, helping to reduce the building mass as seen from Church Walk.



Figure 29 Proposed north elevation (facing Milton Road)



Figure 30 Proposed east elevation (facing Church Walk)



Figure 31 Proposed south elevation (facing the Gravesend RFC's playing fields)



Figure 32 Proposed west elevation (facing Ellerslie)

- 8.5 The building's roofline is also articulated and broken into separate elements to create visual interest.

9.0 Impact Assessment

9.1 In order to assess the suitability of the site for the proposed alteration on the significance of the heritage assets and/or their settings, it is necessary to determine the nature and extent of any impacts resulting from the proposal on heritage assets and/ or their settings.

9.2 When assessing the impact of a proposed development on individual or groups of heritage assets, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.

9.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels are made with reference to Table 2 in Section 3 and satisfy 'Step 3' of Historic England's GPA 3.

Church of St Peter and St Paul – Grade II* Listed Building

9.4 As outlined in section 7 of this report, the Church of St Peter and St Paul was found to hold a good/high level of significance. The site forms part of the church's setting and is considered to make a minor beneficial contribution to the church's significance.

9.5 The proposals would have **no physical impact** upon the church. Any impacts arising from the scheme would be the result of changes to the church's setting

9.6 The proposals would remove the existing low-level pavilion on the site. The intervening vegetation and the height of the pavilion results in there being no visual relationship between the existing building on site and the church. As such, its loss would have **no impact** on the church's significance.

9.7 The proposed new building would place additional height and massing on the site, resulting in an increased awareness of the site in views from the Church. However, the proposed building has been carefully designed with a staggered height, and varied elevational treatment and roof form - all of which help to reduce the perceived mass of the building in views from the surrounding area. The element fronting Church Walk, closest to the Church of St Peter and St Paul, would be of a lower height with the upper floor designed to appear as a dormered pitched roof, helping to reduce the dominance of the building in this location. Moving west, the building steps up in height, however, the elevations and roofline are carefully articulated to create visual interest and to reduce the overall impression of mass. These effects, and the retention of a landscaped frontage to Milton Road, would ensure that the church remains a prominent feature in the streetscape.

9.8 When looking toward the church from the south and south-west, the new building would result in a loss of occasional glimpses of the church. However, the existing vegetation results in only limited views of the church from these directions at present and the loss of these incidental views is considered to have a very limited impact on the church's significance at the level of **negligible adverse**.

9.9 The scheme would create a denser urban grain on the south side of Milton Road than is currently the case. However, the landscaping design and the placement of the building would ensure that a sense of the site's existing landscaped and enclosed character would remain following the development.

- 9.10 Moreover, the scheme retains the mature trees along the north of the boundary and some in the east to help maintain the green and enclosed character of Milton Road. This will also ensure that the framed views of the Church gained when looking west along Milton Road are maintained.
- 9.11 Overall, the scheme would result in an increased awareness of built form on site, and a reduced ability to appreciate the church from the south which currently only offers incidental glimpses. Notwithstanding this slight adverse impact, the scheme has been carefully designed to limit the perceived mass of the building in views from the surrounding area, particularly from the north, east and west to ensure that the church remains a prominent feature in the streetscape.
- 9.12 Additionally, the scheme will retain mature vegetation along the site's boundaries in order to maintain the enclosed and green character of the church's wider setting, albeit with a more densely-developed feel than is currently the case. As such, the proposals are considered to have a **negligible adverse** impact on the setting of the Church of St Peter and St Paul, and a **neutral** impact on its significance.

Milton War Memorial – Grade II Listed Structure

- 9.13 The Milton War Memorial was found to hold a moderate/good level of significance to which the site made a negligible beneficial contribution as part of the monument's setting.
- 9.14 The proposals would have **no physical impact** upon the war memorial.
- 9.15 The proposals would result in awareness of a greater level of development on the site and a greater sense of enclosure to the west of the listed structure. Nevertheless, the proposed massing and design of the development would ensure that the new building does not appear overly dominant in views from the memorial. In addition, the intervening trees in the churchyard and on the site's boundaries would continue to limit the relationship between the two.
- 9.16 As such, the proposals are considered to have a **neutral** impact upon the setting of the Milton War Memorial, and no impact on its significance.

10.0 Conclusion

- 10.1 This Heritage Statement has been prepared on behalf of McCarthy and Stone to accompany an application relating to the redevelopment of the GRFC Bowls Club, Gravesend
- 10.2 The proposed scheme would remove the existing bowling green and clubhouse on the site, constructing a new development of 62 retirement apartments.
- 10.3 The existing clubhouse is not regarded as being a non-designated heritage asset. As a result, the policy of NPPF 203 does not apply.
- 10.4 The proposals would have no direct physical impact on the surrounding heritage assets but would result in changes to their setting. This report has found that the impact of the proposals on the setting of the Church of St Peter and St Paul would be **negligible adverse**, with a **neutral** impact on its significance. In this case, the adverse impacts identified would be at the level of “*less than substantial*” harm in the terms of NPPF Paragraph 202. As such, they should be considered in the context of other public benefits associated with the delivery of the development.
- 10.5 The site is also in the wider setting of the Milton War Memorial. In relation to this asset, the impact on setting was found to be **neutral** and the impact on significance **nil**.
- 10.6 As a result of the approach taken to the design of the scheme, its placement and the response to existing landscaping, we consider that the proposed development has had special regard for the desirability of preserving the setting of the listed buildings in accordance with Section 66(1) of the Planning (Listed Building & Conservation Areas) Act 1990.
- 10.7 In addition to satisfying this provision of the Act, the NPPF Paragraphs 199-203 are also satisfied and, whilst there may be a slight adverse impact on the setting of the Grade II* listed church, no residual harm would be caused to the significance of the heritage assets identified.

APPENDIX 1

STATUTORY LIST DESCRIPTIONS

Gravesham Borough Council



CHURCH OF ST PETER AND ST PAUL

Listed on the National Heritage List for England. [Search over 400,000 listed places](https://historicengland.org.uk/listing/the-list/) (<https://historicengland.org.uk/listing/the-list/>)

Official list entry

Heritage Category: **Listed Building**

Grade: **II***

List Entry Number: **1341484**

Date first listed: **23-Jan-1952**

Statutory Address 1: **CHURCH OF ST PETER AND ST PAUL, MILTON ROAD**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

[Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/) (<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **CHURCH OF ST PETER AND ST PAUL, MILTON ROAD**

The building or site itself may lie within the boundary of more than one authority.

County: **Kent**

District: **Gravesham (District Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **TQ6589773831**

Details

742/7/26 MILTON ROAD 23-JAN-52 (North side) CHURCH OF ST PETER AND ST PAUL

II* Church, C14 with late-C14 or early-C15 west tower. Nave re-roofed in 1790-92. Mid-C19 restorations. North vestry addition of 1950 and adjoining parish rooms of 1992.

MATERIALS: Stone rubble and flint with freestone dressings and knapped flint bands. Slate roof.

PLAN: Nave and chancel in one; W tower; S porch, N vestry and parish rooms.

EXTERIOR: Shallow-pitched Georgian roof to the nave with very deep eaves supported on paired brackets, the E end gable treated as a pediment with an oculus. Shallow battered buttress to E end with flint band above. Three-light C19 Perpendicular style E window. Three 1862 two-light windows to the S side (the SE one is dated), the fourth, westernmost window is weathered but medieval with two cusped lights below an octafoil. S porch with a holy water stoup, porch partly rebuilt above the richly moulded, probably C14, Four-centred arched doorway with engaged shafts; C18 sundial fixed to gable with brick repair above. Low blocked arch in the W wall of the nave. Carved medieval heads to SW, SE and NE corners of nave. N elevation has banded knapped flint decoration. Four-stage west tower with an embattled parapet, diagonal stepped buttresses, and a projecting NE stair turret. Small W doorway with roll moulding and a large window above in similar style to the SW nave window. Two-light belfry windows have cusped heads. Adjoining the church to the north are a 1950s vestry and parish rooms of 1992.

INTERIOR: Flat 1790-92 ceiling with a cornice and plaster ceiling roses. Unusual carved stone anthropomorphic and zoomorphic corbels on the N & S walls marking the location of the medieval roof. No separate chancel. N and W galleries, the fronts decorated with blind traceried panels, are supported on slender clustered wooden columns, dated (Hiscock, 2004) 1763 (W) and 1818/9 (N). They house simple gallery seats on shaped brackets, some boxed in. The N gallery extends to the E wall. The E wall has an early-C19 carved wooden reredos of cusped blind arches with a brattished cornice. 1852 E window, glazed as a memorial to a Dr Pinching, is the only stained glass window in the church. On the S wall a rib-vaulted triple sedilia of trefoil-headed arches on clustered columns with a piscina alongside. The arches and columns are heavily painted but the rib vaults, with little bosses, appear to be medieval. 1860s dado of encaustic tiles to the nave walls. Pulpit, font and nave pews all also mid-C19. Timber drum pulpit with cusped decoration, Caen stone octagonal font decorated with blind panels supported on a clustered shaft. Numbered nave benches with square-headed ends. Various wall monuments and inscription boards. S porch, which has a late-medieval roof, has been converted to a Dunkirk memorial chapel. Peel of eight bells, five of which date to 1656 with the remainder of C19 or C20 date.

ANCILLARY FEATURES: 1950 wooden lych gate war memorial with pitched tile roof to west. Decorative metal gate in churchyard south wall. This was cast at R. L. Priestley's works, the design based on the arms of Sir Henry Sydney, Steward of the Honour of Otford and Lord High Steward of Gravesend in the 1560s, the arms then sometime adopted by the Corporation of Gravesend.

HISTORY: A church at Milton is first mentioned in the Domesday Book of 1086. This seems to have been a predecessor of the present building although on the same site. There is no surviving fabric that can be definitively identified as C11. The church as it now stands is a mixture of Perpendicular architecture of the late-C14 and early-C15 and a late-C18 restoration, with subsequent C19 and C20 works. The tower is late-C14 or early-C15, the S porch is C14 and the nave is also medieval other than its upper courses which are late-C18, added to support the re-roofing of 1790-2. There is an C18 sundial attached to the gable of the south porch designed by Mr James Giles, former Master of the Free School (d.1780). The original west gallery was built in 1763 but then enlarged and a north gallery added in circa 1818/19, probably with monies available for church building and expansion under the Church Building Act of 1818. The altar piece is of a similar date and the organ was purchased in 1829. The church was restored in 1852, to which date the nave pews, communion rails, east window (the only stained glass window in the church), pulpit and font can be attributed. The sedilia and piscina were also restored with new cusps for the sedilia commissioned. In the 1860s the sanctuary and nave walls were tiled and many windows were replaced. One in the nave south wall has a date stone of 1862. The north vestry, the lych gate and the decorative metal gate to Milton Road are all of 1950-1. The adjoining parish rooms are an addition of 1992 incorporating two date stones of 1860 and 1862 (from a former school and headmaster's house) as well as a carved gravestone cross. The north vestry and parish rooms are not of special interest. The sanctuary was restored and reordered in circa 2004 following a collapse of the vault beneath.

SOURCES: Hiscock, R H, 2004, The History of St. Peter & St. Paul, the parish church of Milton next Gravesend. Newman, J & Pevsner, N, 1980, West Kent and the Weald, Buildings of England Series, 2nd edition, pp301-2

REASON FOR DESIGNATION DECISION: SS Peter & Paul, Milton-next-Gravesend is designated at Grade II* for the following principal reasons:

* The extent of surviving medieval fabric from the C14 and early-C15; * The architectural interest of the Georgian restoration, in particular the design and form of the nave roof and the addition of internal north and west galleries; * Architectural details of interest including: carved stone heads to the exterior, and a medieval rib-vaulted sedilia and a piscina with bosses and fine carved stone corbels internally.

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: **356389**

Legacy System: **LBS**

Sources

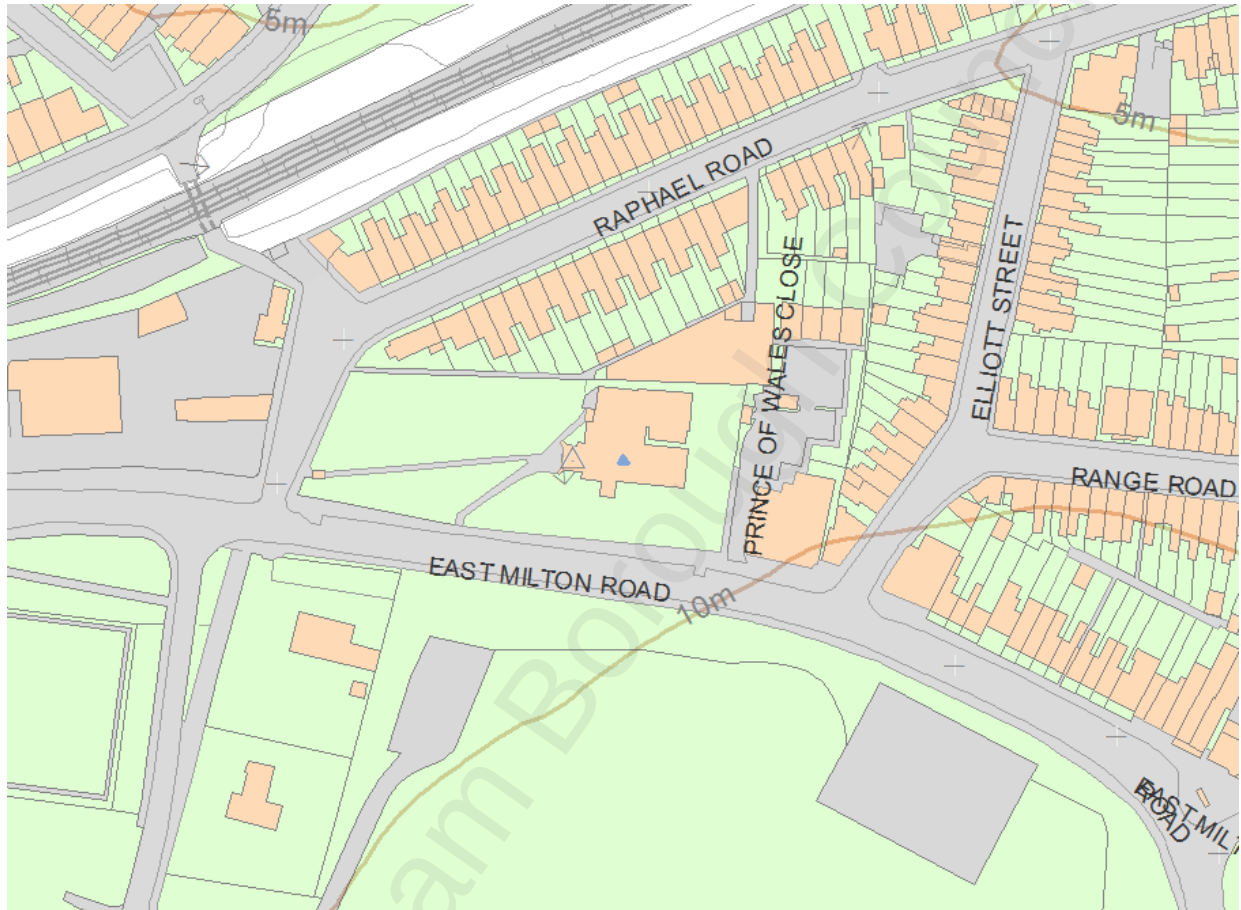
Books and journals

Hiscock, RH, The History of St Peter and St Paul, the parish church of Milton next Gravesend, (2004)

Pevsner, N, Newman, J, The Buildings of England: West Kent and the Weald, (1980), 301-2

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

This map is for quick reference purposes only and may not be to scale. This copy shows the entry on 26-Sep-2022 at 11:01:01.

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End of official list entry



Milton War Memorial

Listed on the National Heritage List for England.

[Search over 400,000 listed places](https://historicengland.org.uk/listing/the-list/) (<https://historicengland.org.uk/listing/the-list/>)

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1441607**

Date first listed: **10-Feb-2017**

Statutory Address 1: **Churchyard of the Church of St Peter and St Paul, East Milton Road, Gravesend, Kent, DA12 2JL**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

[Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/) (<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **Churchyard of the Church of St Peter and St Paul, East Milton Road, Gravesend, Kent, DA12 2JL**

The building or site itself may lie within the boundary of more than one authority.

County: **Kent**

District: **Gravesham (District Authority)**

Parish: **Non Civil Parish**

National Grid Reference: **TQ6583673820**

Summary

First World War memorial unveiled on 8 April 1923.

Reasons for Designation

Milton War Memorial is listed at Grade II for the following principal reasons: * Historic interest: as an eloquent witness to the tragic impact of world events on this community, and the sacrifices it has made in the conflicts of the C20; * Architectural interest: a simple yet dignified Latin cross in Portland stone; * Group value: with the Church of St Peter and St Paul (Grade II*).

History

The aftermath of the First World War saw the biggest single wave of public commemoration ever with tens of thousands of memorials erected across England, both as a result of the huge impact the loss of three quarters of a million British lives had on communities and the official policy of not repatriating the dead, which meant that the memorials provided the main focus of the grief felt at this great loss.

One such memorial was raised at Milton as a permanent testament to the sacrifice made by the members of the local community who lost their lives in the First World War.

It commemorates 116 local servicemen who died during the First World War. It was created by Messrs Swift Bros and unveiled on 8 April 1923 by Councillor W E Thomas. The dedication was performed by Rev G W Mennie.

Details

MATERIALS: Portland stone.

DESCRIPTION: Milton War Memorial is located within the churchyard of St Peter's and St Paul's Church.

It consists of a Latin cross on a square shaft with moulded base. The shaft rises from a square plinth on a moulded base. The plinth has a raised panel on each face which are incised with the names of the fallen.

The moulded shaft base has raised lettering which reads TO THE GLORY OF GOD. The dedication continues on the moulded base AND IN HONOUR OF THOSE WHO GAVE/ THEIR LIVES FOR LIBERTY AND JUSTICE/ IN THE GREAT WAR 1914 – 1918.

The memorial is set upon a raised platform of York stone crazy paving which is original to the erection of the memorial.

Sources

Websites

War Memorials Online, accessed 9 Nov 2016 from www.warmemorialsonline.org.uk/node/148748
(<http://www.warmemorialsonline.org.uk/node/148748>)

War Memorials Register, accessed 9 Nov 2016 from www.iwm.org.uk/memorials/item/memorial/16437
(<http://www.iwm.org.uk/memorials/item/memorial/16437>)

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

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End of official list entry

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Gravesham Borough Council