



Heritage Impact Assessment

Land at East Court
Farm, Gravesend,
Kent

May 2025 | Project Ref 10310A



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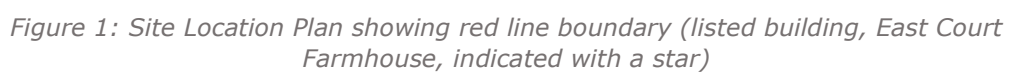
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1. Introduction

- 1.1** This Heritage Impact Assessment (HIA) has been prepared by HCUK Group on behalf of Havenwood Escapes Ltd. It relates to a proposal for a glamping site on land northeast of East Court Farm, Church Lane, Gravesend. The application site consists of scrubland on the edge of a paddock which is currently grazed by llamas and is bounded by Lower Higham Road to the north, a field off Church Lane to the west and further woodland to the east. Its southern boundary borders East Court Farm, sometimes referred to as East Court Manor.
- 1.2** Pre-Application advice was received from Gravesham Borough Council on 30th April 2024 in relation to a similar proposal. The proposal is for 7 glamping pods for overnight accommodation with four barrel saunas and associated hard standing, parking, pathways and landscaping. The pre-application advice was to include a HIA in relation to the potential impact on East Court Farm.
- 1.3** East Court Farmhouse, listed grade II on 23rd January 1952, is described in the list description as:
- "2. An L-shaped C18 farmhouse, 2 storeys red brick. 3 windows facing west and 3 windows facing south. Hipped tiled roof with coved wooden cornice. Ground floor windows are 3-light sashes and have cambered heads. Unusual doorcase with pilasters, moulded surround set in the centre of these, projecting cornice over, rectangular fanlight and door of 6 moulded and fielded panels."*
- 1.4** This is the only relevant designated heritage asset, and the assessment relates to the impact of the proposal on the setting of the listed building (and any curtilage listed structures associated with it). There are listed buildings further northwest (Filborough Farmhouse) and south (St Mary's Church), but their distance and separation from the site and the nature of the proposal mean there would be no effects on their heritage significance.
- 1.5** This report provides relevant historical background to the site and East Court Farm before identifying heritage significance and any contribution the setting of East Court Farm makes to its heritage interest. The site was visited on 27th March 2025 in good weather.



2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.
- 2.4** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a 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.*
- 2.5** Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

2.6 The NPPF requires the impact on the significance of a designated heritage asset² to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 214 and 215 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.³ The Scale of Harm is tabulated at Appendix 1.

2.7 Paragraphs 214 and 215 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁴ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 214 or 215 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.8 Paragraphs 212 and 213 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.9 Paragraph 216 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a

² The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

³ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁴ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 2.10** Paragraph 216 of the NPPF is relevant to building 5, which is partially made up of a historic granary with an attached modern extension.
- 2.11** One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.
- 2.12** Policy CS20 of the Gravesham Local Plan Core Strategy 2014 states that proposals 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.

3. Background and Development

Historic Development

3.1 East Court Farmhouse historically formed part of East Court Farm but is in separate ownership today (as indicated on Figure 1). The historic map regression shows the application site in relation to the farm and its surrounding landscape from the 1840s to the present day. East Court Farmhouse and its surrounding farmstead was laid out in a courtyard style arrangement with built form in a U shaped to the east of the farmhouse. According to the Tithe Apportionment the land was owned in 1841 by The Right Honourable John Stuart Earl of Darnley and tenanted by William Brown Junior. Plot 119, which includes the application site is noted in the apportionment as a Hop Garden. While 118 to the south is an orchard and building. The landholding of East Court Farm included pasture, gravel extraction, farmstead, orchard, hop growing and a pond.



Figure 3: 1841 Tithe Map

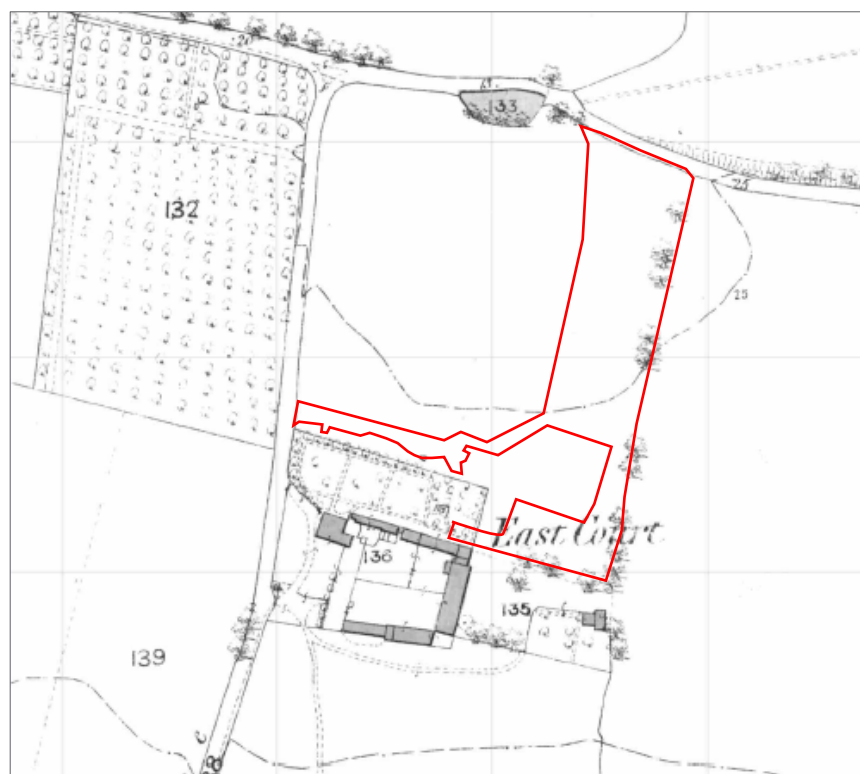


Figure 4: 1863-1864 Ordnance Survey

3.2 By 1863 the historic maps show a treed boundary along the eastern side of the site with the farmstead arranged around the courtyard and what appears to be a kitchen garden north of the farmhouse, which has been extended on its eastern side. Orchards are shown to the northwest. By 1897 the cottage to the south of the site had been demolished and the application site land appears to have been planted with trees, potentially again as orchard. An oast house was constructed to the south of the farmstead by this date.

3.3 The existing gravel extraction which occurred to the northeast of the site in the mid to late 19th century persisted but extended into the northern part of the application site by 1908. By the 1930s the gravel extraction is shown more clearly taking up the northern part of the application site. Also, by this point the farmyard was developed with new buildings at its centre, breaking up the original U-shaped range of built form. The map at Figure 7 indicates a greater level of subdivision across the farmyard suggesting there may have been some changes to ownership and/or uses across the buildings. By 1963 the mapping indicates that the farmyard buildings were no longer all intact with a gap formed in the northeast corner of the once U shaped range.



Figure 5: 1897 Ordnance Survey

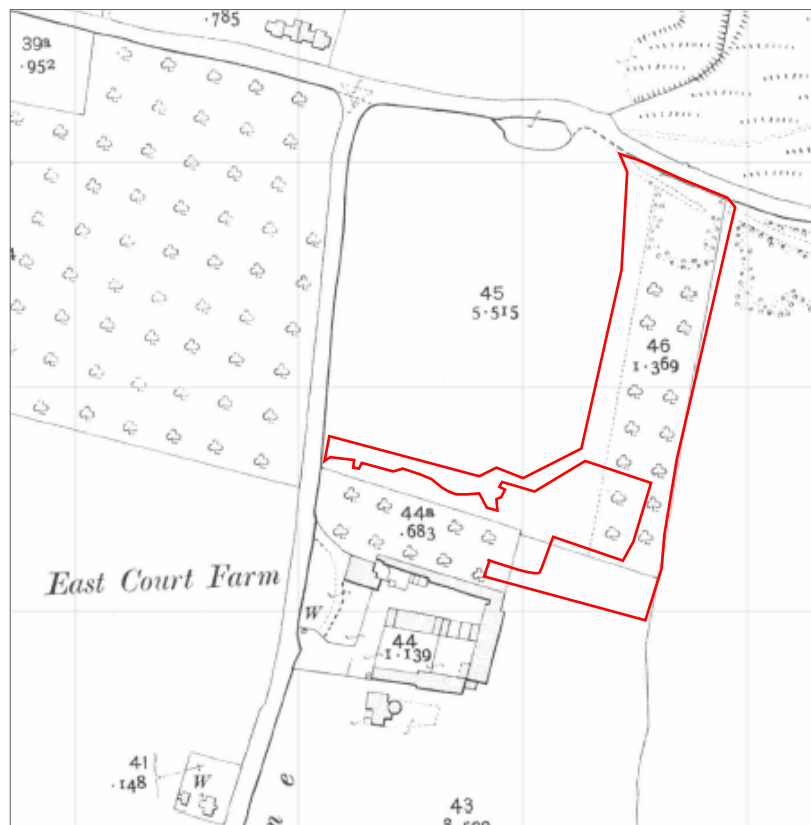


Figure 6: 1908 Ordnance Survey

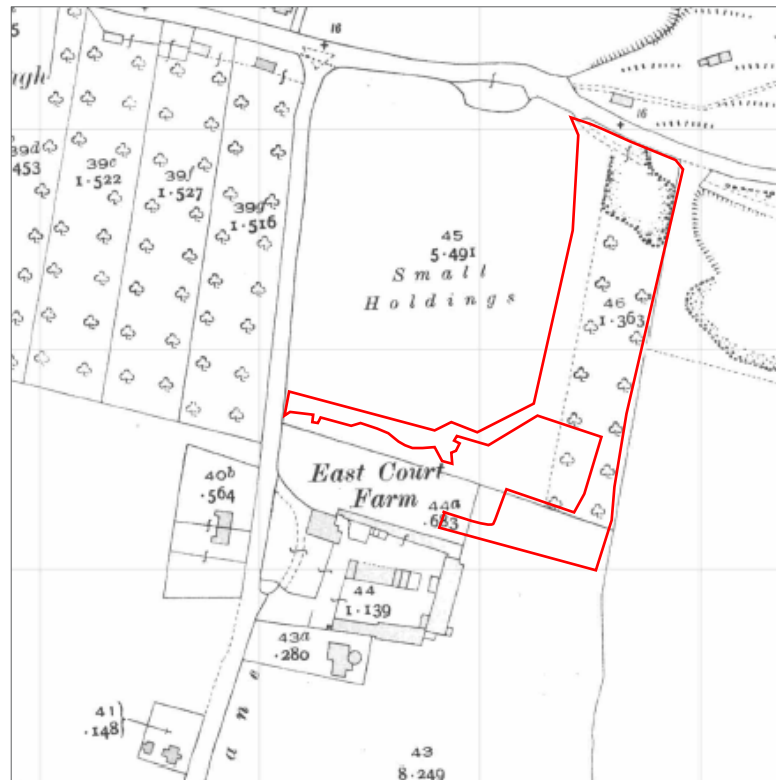


Figure 7: 1932 Ordnance Survey



Figure 8: 1940 Aerial Photograph (Kent County Council)

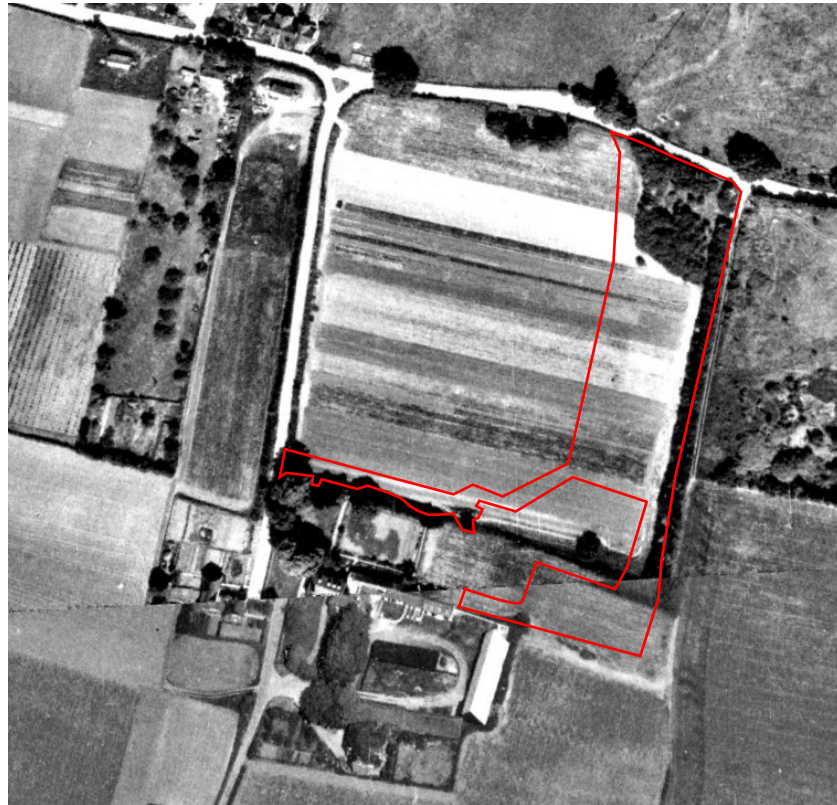


Figure 9: 1960 Aerial Photograph (Kent County Council)

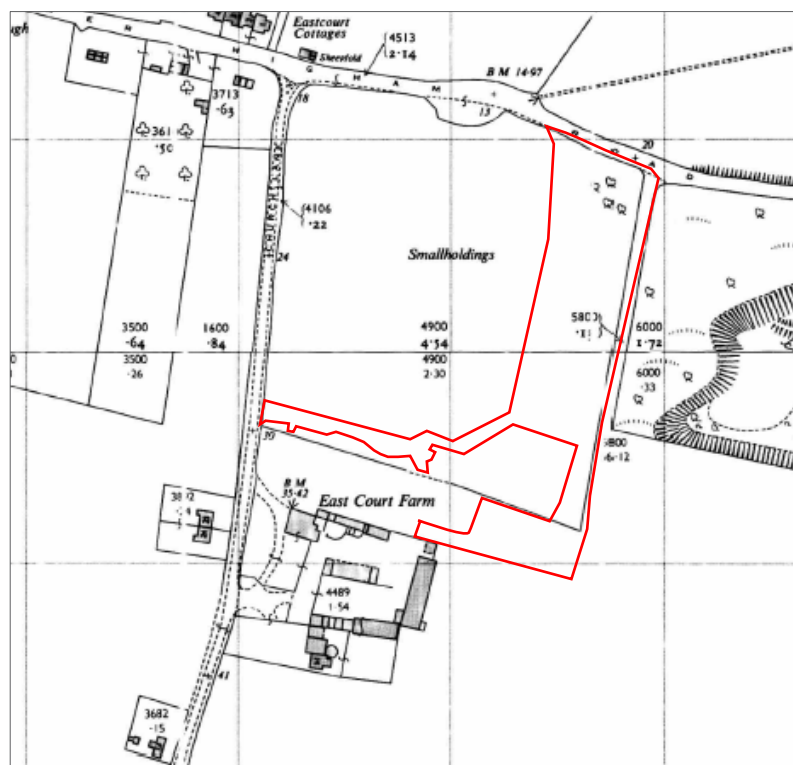


Figure 10: 1963 Ordnance Survey

Relevant planning history

- 3.4** In 2004/5 an application was made and planning and listed building consent permitted for comprehensive restoration and conversion of the farm buildings at East Court Farm (20040447):

"Conversion of redundant farm buildings into 3 residential units and comprising: conversion of southern-most building and insertion of part first floor to form a two storey, three bedroom unit with work area, domestic store, covered amenity space and covered parking spaces (for Unit 1) and covered parking spaces and garden store (for Unit 2); conversion of the eastern-most building and insertion of new first floor to form 2 two storey, three bedroom units each with studio work rooms at ground floor (Units 2 & 3); demolition of existing dutch barn; construction of access drives and external parking spaces and formation of garden areas."

- 3.5** A further application was made in 2015 for the conversion of the historic threshing barn (20151207):

"Conversion of the former threshing barn and insertion of new first floor to form 2 no. two storey three bedroom units each with studio work rooms at ground floor, provision of covered parking spaces and garden store within part of southern most barn and provision of external parking spaces and formation of garden areas in accordance with the plans and details permitted under reference 20040447 as subsequently amended and revised by application reference 20120631 with variations to allow the roof covering to be changed from thatch to clay plain tiles; revisions to the internal layout; amendments to the external alterations to the building including revisions to the entrance doors at the front and rear, the insertion of additional windows and doors and insertion of rooflights in the rear roof slope; revisions to and enlargement of the external garden spaces; and including the submission of details relating to external materials, joinery details, surface treatments, rainwater goods, boundary treatments and soft landscaping pursuant to the previous planning conditions."

- 3.6** Since 2005 the farm buildings have been converted and the ownership of the land divided such that the east and west sides of the farm are in separate ownership. A

separate access road, north of the garden of East Court Farmhouse provides access to the farm buildings to the east and to the application site.

3.7

Permission has also been granted for a padel court and 8 bay parking barn with upper storey accommodation at the farmstead, these structures are just outside the red line boundary of the application site and form part of the holiday cottage offering being cultivated. A single storey stable building was granted planning permission in 2021 to the immediate west of the application site boundary, foundations have been created for this building but it is not complete yet.



Figure 11: 2024 Satellite Image

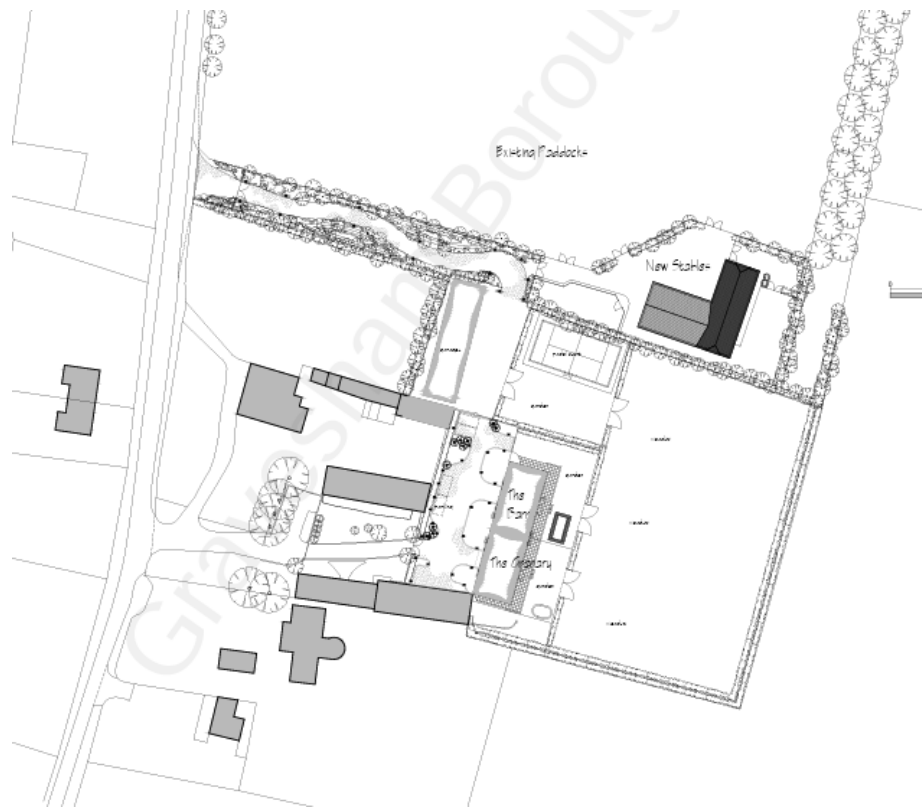


Figure 12: 2021 Permitted wider site layout plan showing new stables and completed padel court.

4. Heritage Significance

4.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment). The relevant heritage asset is East Court Farmhouse, and its curtilage listed farm buildings to the east.



Figure 13: View of East Court Farmhouse, looking southeast

East Court Farmhouse (grade II)

4.2 East Court Farmhouse is an 18th century farmhouse on the east side of Church Lane, set back from the road with a in and out driveway that sweeps in front of the west entrance elevation. The building has a formal west and south elevation and more informal and ad hoc east and north elevations. It is bounded by gardens to the north and northwest, farm buildings to the east and southeast and

gardens/green spaces to the south. A modern tarmac access road with timber estate fencing is located to the north with a low boundary hedge fronting Church Lane. A much taller hedge divides the driveway from the northern enclosed garden area. There are mature trees in the grounds to the southeast and south and to the north. Close board fencing and some brick walls form various boundaries dividing up the now domestic uses in the historic farm buildings to the southeast and east such that the experience of the historic U-shaped farm buildings has been lost.

4.3 East Court Farmhouse is of clear historic and architectural interest as an 18th century farmhouse forming part of a historic farmstead just outside Gravesend. Together with the church and a small number of other farms it formed part of a small farming community just south of the River Thames, which is visible from the application site, over marshland. The historic interest is most evidently contained within its fabric, design and any internal features which may survive but also extends to its diverse range of uses for the land as indicated in 1840, including gravel extraction, orchards, and hop growing.

4.4 The architectural interest of the building is evident externally and internally with features such as the front entrance door and doorcase indicating wealth and prosperity during the 18th and 19th century. The building may well have earlier fabric within it which would form archaeological interest. It is not of specific, notable artistic interest.

4.5 While the division of the farmstead in ownership has meant change to the group of historic buildings over time, the outbuildings are also of some heritage interest and those which survive from the original U-shaped courtyard form the historic setting to the farmhouse and have an integral historic and spatial relationship to it. New built from to the east, part of which is on the application site or abutting it, has been built in character with the farmstead to appear as part of a rural, agricultural setting. The converted former threshing barn and granary (converted in 2005) forming the main surviving building on the eastern side of the original U-shaped range is an imposing structure in terms of its scale. Now divided into smaller units it has a more domestic character and is accessed by a tarmac driveway from the north.

4.6 The application site forms part of the wider rural setting of the farmhouse, but its contribution is limited to its role historically and its location as part of the wider

farmhouse. The site does not offer the opportunity to experience the heritage values of the listed farmhouse in any meaningful way and is separated from it by a modern two storey barn building at right angles to the historic outbuildings and by boundaries which limit views westward toward the farmhouse and its gardens. Similarly, the site, while likely to be visible from the attic spaces or upper storey rooms of the farmhouse does not contribute significantly to the heritage values of the listed farmhouse.



Figure 14: Converted Threshing Barn looking southeast



Figure 15: Rear, east, elevation of East Court Farmhouse and eastern gable end of historic farm building with fencing dividing off the land between the two parts of the farm.

5. Impact Assessment

- 5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including where applicable effects on the setting of those assets. It equates to Step 3 of GPA3, which has a close connection with Step 2. Please refer to the drawn submission for details of the proposal.

Proposed Development

- 5.2** The proposal is for several units of short stay holiday accommodation. Three glamping pods are proposed for the southern end of the application site, closest to the historic farmstead and four Finman retreat pods with accompanying barrel sauna pods with cold plunge pools at the northern end of the site closest to the road. The middle of the site forms a path between the two and the car parking area, which is to be accessed off the existing track to the north of East Court Farm. An area of woodland is proposed on the western side of the parking area and access track. A small timber refuse and recycling covered bin is proposed off the access track (Figure 16).
- 5.3** All the proposed buildings are single storey and small in footprint. They are to be placed to avoid excessive removal of trees or vegetation and have been designed to be as unobtrusive as possible within the site. The access road spurring off the existing tarmac drive will be a permeable material and will divert around the permitted stable building. The glamping pods in the southern part of the site will be accessed from the northeast corner of the plot on footpaths with green meadow space taking up the southern half of the area, closest to the historic threshing barn.

Effects on Significance

- 5.4** The proposal is for low rise structures with small footprints which are designed to fit into the rural surroundings of the site. Views to and from the listed farmhouse in the direction of the site are very limited, save for the most southern part of the site, due to the intervening tree screening on the northern boundary of the farmstead and the intervening built form and boundaries. From within the land north of the padel court, within the red line area, the existing vegetation limits the

opportunity to see and experience the farmhouse. There is more visibility at the southern end of the application site, which is directly east of the farmhouse and its outbuildings.

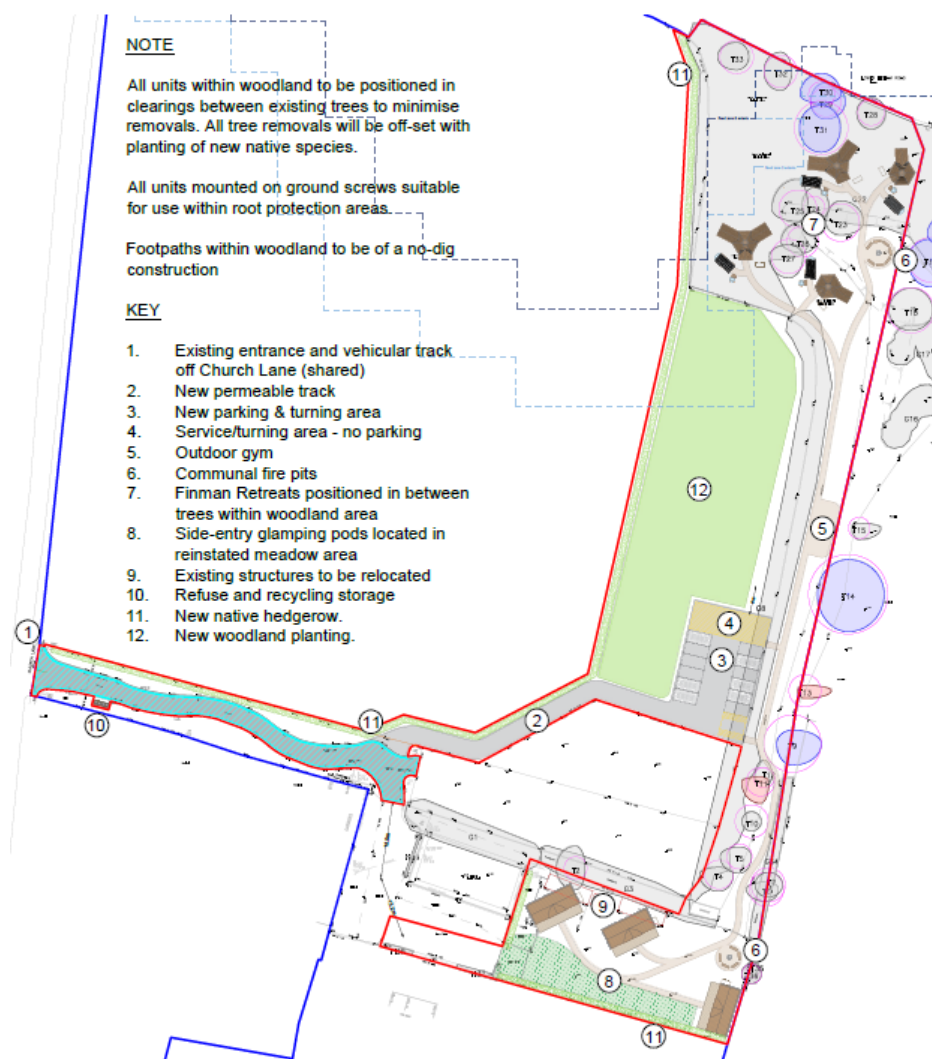


Figure 16: Proposed Site Plan

5.5

No key views of the farmhouse will be affected by the proposed development, which will be hidden beyond the existing built form in views toward the farmhouse's main west and southern elevations. Views onto the north elevation can only be gained from within its own gardens. Views toward the east elevation are possible from the southern part of the site (Figure 17) but they are dominated by the other outbuildings and intervening fencing and hardstanding such that they do not form a key part of the heritage significance of the listed farmhouse.



Figure 17: View from the southern part of the application site toward East Court Farm

5.6

The glamping pods proposed for the southern part of the site are located at a sufficient distance from the threshing barn that there would be no interruption with the historic U-shaped configuration of the farmstead (even though this has been disrupted by past loss of built form). Views toward the former threshing barn would be preserved and its dominance in terms of scale would be retained once the development was completed. These are small structures proposed in a subtle location. A native hedgerow will define the southern boundary of the site, softening the appearance of the new pods.

5.7

For the following reasons the proposal will have no impact on the setting, and thus significance of the listed farmhouse or the historic outbuildings historically associated with it:

- The physical separation between East Court Farmhouse and the application site.
- The existing landscaping between the farmhouse and the application site.
- The proposed landscaping around the site.

- The lack of any direct views from the listed farmhouse to the Finman pods at the northern end of the site
- The lack of a visual effect arising from a change to views from the east elevation of the farmhouse toward the southern part of the site (the glamping pods will form small scale structures in an already developed zone).
- There are no longer distance views of the listed farmhouse where the new glamping pods or Finman pods could be seen.
- The design of the pods is entirely appropriate for the rural, agricultural setting.
- The lighting strategy has been designed to avoid any excess lighting. Small motion sensitive pollards only lighting the ground are proposed.
- Longer views from the northwest and north include fencing, the stables building and other outbuildings and will include the new wooded area such that the additional built form would not be visible and would not result in harm to the significance of the listed farmhouse.

5.8

There will be no harm to the heritage significance of East Court Farmhouse, or its outbuildings. Paragraphs 214 and 215 of the NPPF are therefore not engaged by the proposal.

6. Conclusions

- 6.1** This Heritage Impact Assessment has been informed by a site visit and background historical research. The author has over 20 years' of experience in the heritage sector dealing with designated and non-designated heritage assets on a daily basis. The report sets out the relative heritage values of the heritage assets surrounding it to inform Gravesham Borough Council in its decision making process.
- 6.2** The application site forms a small part of a wider agricultural farmstead which has in the last 20 years been developed with alternative holiday let uses. There are no historic buildings of note within the application site boundary and the only listed building of relevance is East Court Farmhouse, grade II.
- 6.3** A proposal for three glamping pods and four Finman pods has been designed to provide an additional offering to the holiday let business on the wider site in a subtle and unobtrusive manner. The application site forms a small strip of land in the wider setting of the listed farmhouse but makes a very limited contribution to an appreciation of its heritage values.
- 6.4** The rural setting of the isolated farmhouse will be retained and the history of a diversity of land uses will be maintained. The heritage values of East Court Farmhouse will be wholly preserved.
- 6.5** There will be no harm caused to any of the listed building, East Court Farmhouse and paragraphs 214-215 of the NPPF are not engaged by the proposal.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 207 and 208, and guidance on NPPG).⁵

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁵ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

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

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