



25 January 2025

Mr Ethan Bonthron
Planning Department
Gravesham Borough Council

Sent via email

Dear Mr Bonthron

Application 20241133 Land adjacent to 35 Clarence Place

We are writing to object to the grant of this application for the reasons set out below.

This is not an appropriate development in a Conservation Area and the Council's Conservation Officer, writing on the previous application (circa 2005), states that this is one of the most important conservation areas in the Borough and within that, Clarence Place itself is one of the finest roads in terms of the quality and historic interest of its buildings. In respect of this proposal, the Conservation Officer states that the South side of Clarence Place is predominately open space and that the gardens and recreation ground form the heart of the Conservation area, as well as providing the backdrop for the Hill itself. It is important to recognise that this "space" between buildings is one of only two places where views of the summit of Windmill Hill can be seen from the roads which encircle the base of the hill. This space acts as a green corridor which leads the eye on to a further significant area of open space and this is recognised in the Council's Conservation Area Appraisal.

Any changes to or developments in a Conservation area should enhance it, but the Council's Conservation Officer stated in the pre-planning advice, that to build on the site will cause harm. The applicant suggests that any harm to the Conservation area will be offset by the addition of 4 new residential units. However, this increase offers minimal contribution to meeting local need and against this the new development, one which Council Officers state is an overdevelopment of the site anyway, would need to demonstrate a positive contribution to the overall quality of the area as well as being sympathetic to the Conservation area. We think that the proposal is unsympathetic and incoherent and fails on all these considerations for the following reasons:

- The proposed development is for a single villa which will look out of place as the surrounding buildings are semi-detached villas and are much smaller than the proposed development.
- The exposed buff brick does not reflect any other properties in Clarence Place which are either of London stock, while the adjacent properties and the semi-detached villas on the other side of Clarence Place are all rendered.
- The windows are not Georgian sash as per the adjacent villas. It is unclear how the windows and their detailing will align with those on neighbouring properties as the windows on the plan do not relate to the proportion and style of the sash windows of the conservation area and none of the properties on Clarence Place have windows on the side elevation.
- The front door is fully glazed either side, unlike the conservation area vernacular, and is at ground level whereas adjoining properties have their entrances on the first floor. The detail above the door suggests a canopy, which again does not relate to any other nearby buildings.
- The front garden is raised unlike the other properties in Clarence Place.

There are 3 errors in the Planning and Heritage Statement:

1. Page 2: The site is described as “an overgrown area between 35 Clarence Place and Veterans Club”. The site is not overgrown and is 90% lawn and is part of the landscape/garden area surrounding the Veterans Club which is well-maintained and planted with white crocuses as a memorial garden.
2. Page 3: From the blank page it appears the applicant is unaware that an earlier application to build a single 2/3 storey house on this site in 2005, was withdrawn after the Conservation Officer raised a strong objection as it would neither preserve nor enhance the Conservation Area.
3. Page 17: The applicant states that “the proposals seek to add a further four storey structure, alongside and adjoining the row of four properties which have been converted to flats”. This statement is incorrect; three of the properties are private houses.

