



Richard Hart  
Gravesham Borough Council  
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Gravesend  
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Direct Dial: 02079733637

Our ref: BL41

20 May 2020

Dear Mr Hart

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

Land At Market Square And Horn Yard Car Parks New Swan Yard Gravesend DA12  
2EN

**Application No.** 20200343

Thank you for your letter of 20 April 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Gravesend flourished as a medieval settlement because of its role as a port at a strategic location on the River Thames. The High Street is the core of Gravesend's historic town and was laid out on a north/south alignment terminating at the river landing. As the town developed other major streets were also laid out on a north/south alignment including Queen Street with small alleys and lanes connecting back to the High Street. A hierarchy of streets with a grid like layout are therefore important characteristics of the historic town and the character and appearance of the conservation areas. Historic mapping shows that development between the main streets was focussed around a series of small yards and open spaces suggesting some commercial activity and probably low scale development. While the historic townscape on the High Street and Queen Street remains intact (and is protected through conservation area designations) the backlands development which once existed on the site for the eastern heritage quarter development has now been replaced by surface car parking.

This proposal is a revised scheme for the eastern half of a major development in Gravesend known as the Heritage Quarter. It is proposed to construct three blocks of 3 to 10 storeys comprising of 242 residential units as well as car park, landscaping and associated works on either side of Bank Street. The site lies within the immediate setting of two conservation areas, the High Street, Queen Street Conservation Area and the Gravesend Riverside Conservation Area, both of which also contain listed buildings.





We provided pre-application advice on this proposal in January 2019 in which we supported the principle of re-developing the site as it has the potential to contribute positively to the Gravesham's regeneration objectives by bringing increased activity to the northern end of the High Street. Development here also has the potential to reveal and reinforce our understanding of the historic layout and character of the historic town by improving permeability to the High Street and by contributing positively to the townscape as a whole with a high quality development.

We do not have concerns regarding the development north of Bank Street, which we think is sympathetic to the adjacent conservation areas and listed buildings. The design is varied and dynamic, with interesting rooflines and elevations which draw on historic wharfs for inspiration.

We have some small concerns regarding the southern block that could be addressed through changes to the design in order to meet the criteria of NPPF paragraphs 127 (c) and (d) which note that decisions should ensure that developments are 'sympathetic to local character and history, including the surrounding built environment and landscape setting' and that they should be 'attractive, welcoming and distinctive places'. These tie into paragraph 192 (c) which notes the desirability of new development making a positive contribution to local character and distinctiveness.

We acknowledge that the block south of Bank Street is an improvement on the proposal seen at pre-application stage in terms of its massing, and the inclusion of double pitched roofs in the central bays are positive. However, it remains not as lively as the proposed block north of Bank Street, and creates a rather monotonous elevation on the approach to the High Street and Queen Street conservation area. The elevation of the block facing Bank Street, bar the central bays with double pitched roofs, does little to create a sense of rhythm such as that which enlivens the elevation on the northern side. For example, the rigid pattern of projecting balconies is quite relentless. Providing interspersed projecting and recessing balconies could be a way of breaking this up and providing more interest in this elevation.

These changes would provide a more welcoming approach to the conservation area and core of Gravesend. We also think that the success of the overall scheme will largely rest in the quality of materials and detailed design. We suggest that a condition be included that detailed plans at a suitable scale and sample panels are submitted to the local authority prior to construction. If these small changes are undertaken, we do not think that the development would cause harm the historic environment and therefore paragraphs 190 to 196 of the NPPF would not apply.

However if your Council concludes that there is some harm then the criteria set out in paragraphs 190 to 196 would need to be fulfilled. Your Council would need to consider if the proposal has avoided or minimised harm to avoid conflict between the conservation of heritage assets and any aspect of a proposal (Paragraph 190) and if so whether any unavoidable harm has clear and convincing justification (Paragraph 194). Your Council would also need to weigh the harm against the public benefits of



the proposal in the manner described in Paragraph 196.

**Recommendation**

Historic England has some minor concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 127 (c) and (d) and 192 (c) of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. As well as section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

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