

Management Plan

Gravesends 19th Century Suburban Conservation Areas



This document relates to the Conservation Areas that encompass much of Gravesend's suburban development in the 19th century:

Darnley Road Conservation Area
Pelham Road/The Avenue Conservation Area
Windmill Hill Conservation Area

A separate Management Plan relates to eight Conservation Areas that comprise much of the town centre of Gravesend.

CONTENTS

1	Introduction	1
1.1	The purpose of the Management Proposals	
1.2	The Character Appraisals	
2	Legislative background	3
2.1	The implications of conservation area designation	
2.2	National policy and guidance	
2.3	The Local Plan and the emerging Local Development Framework	
2.4	Past and present town centre initiatives	
3	Generic actions by the Borough Council	8
3.1	The development control process	
3.2	Community involvement	
3.3	An Enforcement Strategy	
3.4	Shopfronts and advertising	
3.5	Regeneration and the role of grant aid	
3.6	Highways and the public realm	
3.7	Tree and landscape management	
3.8	The production of detailed guidance	
4	Policies for the control of the Historic Environment	15
4.1	Introduction	
4.2	The control of historic buildings	
4.3	The control of conservation areas	
4.4	The control of Scheduled Monuments and other archaeological features	
4.5	Article 4 Directions	
4.6	Buildings at Risk and Section 215 Notices	
5	Site specific actions	19
5.1	Darnley Road Conservation Area	
5.2	Pelham Road/The Avenue Conservation Area	
5.3	Windmill Hill Conservation Area	

6 Delivering the Management Proposals 27

- 6.1 Introduction
- 6.2 Expectations
- 6.3 Programme
- 6.4 Commitment and adoption
- 6.6 Monitoring and review

APPENDICES

Appendix 1 Summary of generic actions 30

Appendix 2 Summary of policies 32

Appendix 3 Draft Action Plan 34

Appendix 4 Local List – draft criteria 36

Appendix 5 Suggestions for Local Listing 38

Appendix 6 Contact details 39

ILLUSTRATIONS

Management Proposals maps for:

Darnley Road Conservation Area 40

Pelham Road/The Avenue Conservation Area 41

Windmill Hill Conservation Area 42

PUBLIC CONSULTATION REPORTS 43

1. INTRODUCTION

1.1 The purpose of the Management Proposals

These Management Proposals have been drawn up following the production of detailed 'Character Appraisals' for each of the three 19th century suburban conservation areas of Gravesend, i.e. Darnley Road, Pelham Road/ The Avenue and the Windmill Hill. They provide a framework for future actions which although primarily the responsibility of the Borough Council, will also depend on the co-operation and enthusiasm of local people and local organisations.

Government policy¹ has made it clear that conservation areas are not necessarily 'preservation' areas. Change is an inevitable facet of modern life and the challenge is to manage change in a manner that does not lose sight of the special historic qualities of a place.

Local authorities are required by law to periodically review their conservation areas and the preparation of Character Appraisals and Management Proposals forms part of this obligation. Indeed, keeping Character Appraisals up to date is a Key Performance Indicator in the Best Value assessment of local authorities, although after July 2007 this no longer included Management Proposals.

The involvement and approval of the local community in the formulation and delivery of these documents helps to strengthen their status and will hopefully mean that the various actions identified in the Management Proposals will have greater

impact and longevity. For the three suburban conservation areas this has included a public meeting early in the appraisal process (to which everyone in each of the conservation areas was invited via a leaflet drop) and a full, four week public consultation phase once the draft documents were completed and the maps prepared.

The proactive management of conservation areas gives clarity and robustness to decision making, which means that issues may be more defensible in, for instance, planning appeals. These documents will therefore be of use to the Borough Council when determining applications for change within or on the edges of the conservation areas, and for property owners and their agents when considering schemes for refurbishment, alteration or new development.

1.2 The Character Appraisals

The Character Appraisals for each of the three conservation areas provided an assessment of the positive and negative features of each area, including a summary of the principal 'Issues' affecting each conservation area. Since the areas in question are similar in nature, many of the issues identified were common to the three areas, such as, for example, the loss of front boundaries and gardens and change to hardstanding for parking.

These Management Proposals therefore set out how the vulnerable historic environment in Gravesend can be managed by the Borough Council in the long term and considers 'generic' actions (section 3) with recommendations for Council policy (in Section 4). Proposals for site specific problems within each conservation area are also defined (in Section 5). Most importantly,

¹ Planning Policy Guidance 15 (PPG15) – *Planning and the Historic Environment* - 1994

Section 6 and Appendix 3 provide an overall strategy for the actions required to 'preserve or enhance' these conservation areas for future generations, including the allocation of responsibilities and timescales.

2. LEGISLATIVE BACKGROUND

2.1 The implications of conservation area designation

Statutory controls

Designation as a conservation area brings a number of specific statutory provisions aimed at assisting the “preservation and enhancement” of the area. These are as follows:

- The local authority is under a general duty to review designations ‘from time to time’ and to ensure the preservation and enhancement of the conservation area. There is a particular duty to prepare proposals (such as conservation area appraisals or grant schemes) to that end;
- In the exercise of any powers under the Planning Acts with respect to any buildings or other land in a conservation area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area;
- Extra publicity must be given to planning applications affecting conservation areas. This is usually achieved through the use of advertising in the local newspaper;
- Conservation Area Consent is required for the demolition of any unlisted building in a conservation area and the local authority or the Secretary of State may take enforcement action or institute a criminal prosecution if consent is not obtained;
- Written notice must be given to the Borough Council before works are carried out to most trees in the area;
- The display of advertisements may be more restricted than elsewhere;
- The Borough Council or the Secretary of State may be able to take steps to ensure that a building in a conservation

area is kept in good repair through the use of Urgent Works Notices and Amenity Notices;

- The energy conservation expectations of the Building Regulations (Part L) do not necessarily apply to buildings within a conservation area;
- Powers exist for local authorities, English Heritage or the Heritage Lottery Fund to provide financial grant schemes to assist with the upkeep of buildings in conservation areas, although these are usually targeted to areas of economic deprivation.

Specific requirements for planning permission

Certain works to dwelling houses within a conservation area, which are normally considered to be “permitted development”, require planning approval from the Borough Council. The overall effect of these additional controls is that the amount of building works which can be carried out to a dwelling house or within its grounds without a planning application is substantially smaller in a conservation area than elsewhere.

These are:

- Planning permission is needed for extensions to dwelling houses in conservation areas where they add more than 10% or 50 cubic metres in volume to the property (whichever is greater). This is a slightly smaller amount than the usual requirement for planning permission which is limited to 15% or 70 cubic metres, except for terraced houses which are also limited to 10% or 50 cubic metres, wherever they are located;
- Planning permission is needed for external cladding to dwelling houses in conservation areas, using stone, artificial

- stone, timber, plastic or tiles;
- Planning permission is needed for any alteration to the roof of a dwelling house resulting in a material alteration to its shape, most notably the addition of dormer windows;
- Planning permission is needed for the erection of any structure whose cubic capacity exceeds 10 cubic metres within the curtilage of a dwelling. This is especially important for sheds, garages, and other outbuildings in gardens within conservation areas.

Where a building is statutorily listed, different legislation applies, as all internal and external alterations which affect the special architectural or historic interest of the building require Listed Building Consent. Furthermore, commercial properties (such as shops and public houses), and houses which are in multiple occupation or flats, have far fewer permitted development rights and therefore planning permission is already required for most external alterations to these buildings.

Satellite dishes

The rules governing satellite dishes in conservation areas are significantly tighter than outside such areas. These state that the installation of a satellite antenna on any building or structure within the curtilage of a family house in a conservation area is only permitted development if the following conditions are met:

- The dish does not exceed 90 cm in any dimension;
- No part of it must exceed the highest part of the roof;
- It is not installed on a chimney;
- It is not on a building exceeding 15 metres in height;
- It is not on a wall or roof slope fronting a highway or footway;
- It is located so its visual impact is minimised;
- It is removed as soon as it is no longer required;
- There is not a dish already on the building or structure.

If any of these does not apply, a specific planning application will be required, and it is unlikely that permission will be granted.

Article 4 directions

Permitted development rights may be withdrawn if the Borough Council imposes an Article 4 Direction. This does not mean that development, such as changes to windows or the erection of satellite aerials, will necessarily be impossible. It does, however, mean that planning permission has to be sought and this allows for the merits of a proposal to be considered against the conservation interests.

There is an Article 4 Direction in place for all the three Conservation Areas in question. Further information about new Article 4 Directions in Gravesham Borough can be found under Section 4.5.

Telecommunications masts

The law governing the erection of masts and antennae is complex and whilst some companies have licences which allow some structures to be put up in conservation areas without planning permission, the legislation does allow for consultation with the local authority concerned before the work is put in hand. Further information can be found in the second edition of PPG8 *Telecommunications*.

Trees

Within conservation areas, anyone intending lopping or felling a tree greater than 75 mm. diameter at 1.5 metres above the ground must give the Borough Council six weeks written notice before starting the work. This provides the Borough Council with an opportunity of assessing the tree to see if it makes a positive contribution to the character or appearance of the conservation area, in which case a Tree Preservation Order may be made. This protects the tree from felling or inappropriate lopping. Fruit trees are no longer exempt, although slightly different constraints occur where the tree forms part of a managed forest or is in another agricultural use.

2.2 National policy and guidance

Central government policy on conservation areas is contained in PPG15.² This covers the designation of areas and the responsibilities that stem from designation, including the appraisal of the special interest of conservation areas and the control of development affecting them. It also makes the general point that *'conservation and sustainable economic growth are complementary objectives and should not generally be seen as in opposition to one another'*.

PPG15 sets the expectations by urging local authorities *'to maintain and strengthen their commitment to stewardship of the historic environment'*. The expectations are further developed in English Heritage guidance on the appraisal and management of conservation areas.³

2 PPG15 - *Planning Policy Guidance: Planning and the historic environment* - 1994

3 English Heritage – *Guidance on Con-*

2.3 The Development Plan and the emerging Local Development Framework

The Local Plan

The Borough Council's policies relating to the historic environment are set out in the Gravesham Local Plan 1994, soon to be replaced by the new Local Development Framework (LDF). The following policies currently (December 2007) apply but may soon be replaced or removed altogether: Policy TC0, TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8, TC9, TC10, TC11, TC12, Policy R3, Proposal PM13, and Policy AP3.

It is proposed that the three Character Appraisals and this Management Proposals document will be Development Plan Documents, forming part of the LDF.

Other relevant documents

Other relevant documents include:

- **Regional Planning Guidance for the South East (RPG9)** (published March 2001), Key Development Principle No.9; Policy Q2; Policy Q5; Policy Q7; Policy E1.
- **Regional Planning Guidance 9a: The Thames Gateway Planning Framework** (1995), Paras. 5.4.7 & 5.4.8: Built Heritage, Annex 1: Planning Framework Principles No.13.
- **Regional Planning Guidance 9b: Strategic Planning Guidance for the River Thames** (useful in relation to views to and from the river).

servation Area appraisals – 2005

English Heritage – *Guidance on Management Proposals for Conservation Areas* – 2005

- **Draft South East Plan (Regional Spatial Strategy)** (submitted to Government on 31st March 2006), Section D8 Management of the Built and Historic Environment: Policy BE1; Policy BE2; Policy BE7; Section E4 (Kent Thames Gateway).
- **The Kent and Medway Structure Plan** (adopted 6th July 2006), Policy QL1: Quality of Development and Design; Policy QL6: Conservation Areas; Policy QL7: Archaeological Sites; Policy QL8: Buildings of Architectural or Historic Importance; Policy QL9: Historic Landscape Features; Policy QL10: Heritage Assets – Enabling Development.

The Thames Gateway

The Draft South East Plan of the South East Regional Assembly recognises the Northfleet and Gravesend conurbation as being in a Growth Area within the Kent Thames Gateway Sub-region. The various policy documents outlined above have, since RPG9 (1994), recognised Gravesham's important place in the Thames Gateway (incorporating the former East Thames Corridor). RPG9a emphasizes the importance of Gravesham in achieving the Thames Gateway's overall vision (para. 6.8.1).

The Thames Gateway is an overarching term for the regeneration of large parts of East London and parts of Essex and Kent, including Northfleet and Gravesend. The Thames Gateway London Partnership estimates that the expected investment in the whole region will provide 150,000 jobs and 200,000 homes over the next 10 years. The large scale of this scheme will see a great deal of change across the area, including the introduction of new transport infrastructure

including a Channel Tunnel Rail link (with a new connection to Gravesend at nearby Ebbsfleet, now completed) and major road building schemes such as the widening of the A2 to the south of the town.

The policies included in the local and regional guidance, as outlined above, seek to guide this period of change and the specified policies all recognise the importance of retaining Gravesham's heritage. More specific actions, directly relating to Gravesend town centre, are detailed below.

2.4 Past and present town centre initiatives

The Borough Council has made the regeneration of Gravesend town centre one of its main priorities for the past 20 years. The town centre suffered from economic decline in many of its secondary retail areas and lack of investment in the upkeep of private property as the fortunes of the economy oscillated. The viability of the primary shopping area was maintained with the development of the Thamesgate (formerly Anglesea) Centre in 1973 And the St George's Centre in 1983.

The Borough Council considers that heritage led regeneration, which utilises the existing historic environment in Gravesend, plays a key role in the revitalisation of the town centre. In 1987, the council set up its 'Impact' environmental improvement initiative, which undertook many projects for the enhancement of public spaces and for the restoration and reuse of historic buildings. Through this initiative, the council has run many historic building grant aid schemes, aimed at encouraging private owners to restore and reuse their historic properties. Many schemes have been in partnership with English Heritage including two 'Town Schemes', two 'Conservation Area Partnership Schemes'

and two 'Heritage Economic Regeneration Schemes'. The council has also funded its own grant schemes including the Historic Building Scheme, the Private Scheme, the Places to Live Scheme and the Historic Grant Scheme.

In addition to bringing about the restoration of many historic buildings, these grant aid schemes have also achieved the appropriate enhancement of many areas of public realm throughout the town centre.

In anticipation of the arrival of Bluewater shopping centre, the council set up the Gravesend Town Centre Initiative, a public/private partnership. This built on the heritage led regeneration work already underway and has been instrumental in turning around the fortunes of the town centre, building on its heritage and riverside assets.

In 1997 The Gravesend Town Centre Strategy for Action was published, establishing the regeneration strategy for each of the town's six 'quarters'. Development of this strategy has continued by the production of more detailed plans for its component quarters. 'A Strategy for the Heritage Riverside' was published in 1999 relating to the town centre riverside, largely within the Gravesend Riverside Conservation Area.

'The Heritage Quarter Vision and Business Plan' was published in 2003 aimed at bringing about the regeneration of the area between Bath Street to the west, Queen Street to the east, the river to the north and St George's shopping centre and the Borough Market to the south, with High Street as the central backbone. This area lies in the High Street Conservation Area and part of the Queen Street Conservation Area.

Many of the key issues which the Vision set out to address are also identified in the 2007 character appraisals for the High Street and Queen Street Conservation Areas, including:

- Improvements to public open spaces including St Andrew's Gardens
- Bringing back buildings in to beneficial use such as Town Pier and the Town Hall
- Improvements to St George's church and its setting
- Removal of some surface car parks and replacement with sensitively designed mixed-use development which reflects the existing historic grain of the area
- Improvements to the public realm with better quality paving and street furniture
- Improved pedestrian access and better traffic management

The Transport Quarter Masterplan was published in 2005 covering the area around Gravesend railway station between Darnley Road to the west, New Road to the north, the east side of Garrick Street to the east and the southern boundary of Rathmore Road car park to the south. Part of this area lies in the Hospital and Commercial Quarter Conservation Area. The development of the Masterplan proposals to detailed stage and identification of means of securing its development is underway.

3. GENERIC ACTIONS BY THE BOROUGH COUNCIL

3.1 The development control process

The interpretation of planning requirements

Local authorities already have a variety of controls available through their planning powers, but much depends upon how they are interpreted and implemented. For instance, any material changes to the appearance of properties that are not single dwelling houses require planning permission. A new shopfront is generally regarded as a material change, as are windows on commercial buildings or flats. Even small changes can have a cumulatively adverse effect.

- **ACTION 1:** *The Borough Council will adopt a consistent interpretation of what it considers to be a 'material' changes in conservation areas.*

Promotion and awareness

While it is often the conservation officer who is the principal consultant for planning applications and other schemes in conservation areas, other departments in the Council will also deal with matters affecting conservation in some way. It is the responsibility of every employee to give regard to the special character of conservation areas and promote awareness to residents. An active Historic Environment Champion (see below) can be an effective way of encouraging understanding across the Borough Council's various departments.

A consistency of approach in determining planning applications must lie at the centre of any fair system of controlling change, especially in conservation areas. Consistent

decisions also lead to an improved public perception that the system is fair and, in turn, there is a greater public engagement with the process. While each planning application has to be determined on its own merits, much can be achieved by having a clear interpretation of statutes, detailed policy and guidance.

It is important that both officers and the councillors who make decisions on planning applications should be aware that development proposals can have an affect on a conservation area even when the site is some distance outside it. In such cases, the duty to pay special attention to preserving and enhancing the 'character and appearance' of the conservation area still applies.

Focused training to help elected councillors and officers to work within these constraints is helpful, and English Heritage is currently offering some specialised training under their HELM (Heritage Environment - Local Management) initiative. There is also a need to provide local opportunities for training, particularly relating to the use of traditional buildings materials and techniques, for builders, agents such as planning consultants, architects and surveyors.

- **ACTION 2:** *The Council will encourage a good understanding of historic environment issues across its departments and promote consistent decision making by encouraging both staff and councillors to take advantages of training opportunities through such schemes such as English Heritage's HELM initiative.*

Conservation advice within the Borough Council

The system of considering planning applications for their suitability and conformity with national and local policies is long established within the Borough as a whole but within conservation areas even more stringent controls exist. It is essential that these policies are applied consistently to the development control process.

The Borough has established a system whereby all applications concerning land or properties within or close to a conservation area are referred to the council's Conservation Officer. Within an agreed period of time for consideration of an application, a conservation specialist will advise the planning officer assigned to the application whether the proposal will 'preserve or enhance' the character of the conservation area. The specialist will also advise on whether the application should be supported or refused on conservation grounds, and will attend meetings and conduct negotiations as necessary. Pre-application discussions will be provided if requested, resources permitting. When necessary, the specialist will defend the Council's decision at appeal.

As an important constituent to this process, the conservation specialist should be trained in the field of historic building conservation and/or planning, either through formal qualifications, long-term experience in the field, or both. Membership of the Institute of Historic Building Conservation (IHBC) would be an advantage. The Skills Base Best Value Performance Indicator BVPI205 measures the suitability of persons for this and other specialist roles, and the Borough Council is committed to meeting the criteria for such a specialised role.

- **ACTION 3:** *The Council will consult its conservation officer on all development control proposals affecting the character of conservation areas and their setting.*

New development

Where sites do come forward for new development in Gravesend, it is likely that the new development will impact on one of the several conservation areas within the town centre even if the site does not lie within a designated boundary. The provision of detailed drawings, photographs, and other illustrative material by the applicant will help the Council in assessing applications for new development, and applications will not be registered until all of the necessary information has been provided by the applicant. 'Design and Access' statements are now also required for many planning applications and are particularly important where the site concerned lies within, or on the edges of, a conservation area. Further guidance concerning the detailed information required by the Council as part of any planning application in the Borough is available from the Planning and Regeneration Department and from the council's web site.

For applications affecting listed buildings and also within conservation areas, there is a clear case for a coherent written argument in favour of the benefits of the proposal at the time of application. This could take the form of a letter, but ideally would be through a more thorough 'Conservation Statement', sometimes also referred to as a 'Justification Statement'. The inclusion of mock-up photographs, which give an impression of how the proposal would look, may also be required.

ACTION 4: Overall, the Council will:

- Encourage pre-application discussions;
- Ensure that applications are accompanied, where appropriate, by detailed 'Conservation Statements';
- In Conservation Areas, where the appearance of a building has suffered from the loss of original architectural features and unsympathetic alterations, the Council will seek, as part of a planning application, the reversal of unsympathetic alterations and the re-instatement of appropriate traditional architectural features using traditional materials;
- In conservation areas, the Council will encourage the replacement of buildings identified on the Townscape Appraisal Map as making a negative contribution to the character and appearance of the conservation area.

The role of an Historic Environment Champion

As recommended by English Heritage, the Borough Council can appoint an Historic Environment Champion to take the lead in conservation policy and implementation within the organisation. A champion is usually an elected member of the Council who has a special interest in conservation and is prepared to spend additional time encouraging good practice and higher standards of control generally. A champion can, therefore, play an important role in raising the profile of conservation in general and ensuring that key strategic decisions are taken with a full consideration of their potential effect on the historic environment. This role will be optimised if the champion has a thorough knowledge of the state of Gravesham Borough's historic environment

and regular liaison meetings with the conservation section.

- **ACTION 5:** The Borough Council will consider appointing an Historic Environment Champion to raise the profile of heritage issues within the Council.

3.2 Community involvement**Local amenity groups and the community generally**

Gravesham Borough has a rich mix of individuals and groups from diverse backgrounds, cultures and lifestyles. The Council has pledged its commitment to equality and diversity by formally adopting the *Equality Standard for Local Government*, which shows how the Borough Council will be fully responsive to the needs of the community it serves. It is important that hard-to-reach groups and individuals are engaged in the planning process and given access to the improved level of understanding mentioned above.

For these Character Appraisal and Management Proposal documents it is important that the active engagement of the local community, which was developed during the drafting of the documents, is maintained and developed further. The documents should also be promoted in the community as useful aids in identifying and retaining what is important in their area. This will help to promote a sense of ownership that will foster an improved level of understanding of the importance of preserving and enhancing the special character of the conservation areas concerned.

As recommended in PPG15 (para. 4.13), the Borough Council could also consider establishing a Conservation Area Advisory Committee, both to assist in formulating policies for the conservation areas within the Borough, and also as a continuing source of advice on matters which could affect an area.

- **ACTION 6:** *The Borough Council will continue to engage with local bodies and interest groups and promote the continued involvement of the local community in managing and enhancing the character of its conservation areas.*
- **ACTION 7:** *The Borough Council will reach out to the wider community in its consultation process and use reasonable means by which to engage as many different groups and individuals as possible. An assessment of the impact of the Council's policies on all sections of the community will also be carried out.*
- **ACTION 8:** *The Borough Council could consider establishing a Conservation Area Advisory Committee to provide detailed advice on policies and matters which affect the Borough's conservation areas.*

3.3 An Enforcement Strategy

Most local authorities subscribe to the Cabinet Office *Enforcement Concordat*, which sets out best practice principles for enforcement, such as openness, consistency, proportionality and responding to complaints. An Enforcement Strategy for the Borough Council has already been put in place and can be accessed on the Council's website.

3.4 Shopfronts and advertising

The Darnley Road and also Pelham Road/The Avenue Conservation Area contain a number of shops, mostly located in historic properties. In some cases, poorly designed shop fronts with little regard for the host building and the streetscene spoil the historic character and appearance of the locality. The better quality shopfronts in Gravesend High Street, many of which have been installed or repaired under recent grant schemes, should serve as exemplars.

The control of advertising within the conservation areas is a major issue. PPG 15 recognises that all outdoor advertisements affect the appearance of the building or neighbourhood where they are displayed. Currently, the visual appearance of the conservation areas is not unduly affected by garish advertisements such as banners and A-boards, although over-dominant fascias, often with inappropriate lighting, have a negative impact in some locations.

The Borough Council is presently preparing detailed guidance on shopfronts and advertising which should be available to the public in 2008. This will provide development control staff, shop owners and their agents with the basic principles of good shopfront design including lighting and advertisement control.

- **ACTION 9:** *The Borough Council will publish detailed guidance on shopfront design and advertisements in historic areas.*
- **ACTION 10:** *The Council will ensure that all proposed advertisements accord with Policy TC8 of the Local Plan and the subsequent relevant policies that will be adopted in the*

forthcoming LDF.

- **ACTION 11:** *When considering planning applications for new shopfronts, the Council will be mindful of Policy TC9 in the Local Plan (and any subsequent relevant policy in the emerging Local Development Framework).*

3.5 Regeneration and the role of grant aid

In 1990 the council carried out an environmental enhancement scheme to the Windmill Hill open space which significantly improved the area, reducing the impact of vehicles on this prominent site.

Since the early 1980s the council has run various historic building grant schemes. Many properties in these conservation areas have benefitted from grant assistance with the restoration and repair of traditional historic features such as windows and boundary treatment.

Unfortunately there is currently no such grant scheme in Gravesend and the Borough Council is not able at present to offer property owners any financial help towards the cost of repairs.

- **ACTION 12:** *Subject to the availability of resources, the council will consider re-introducing grant aid for historic buildings, either as a council run scheme or to attract and lever in external funding from others such as English Heritage and Heritage Lottery Fund.*

3.6 Highways and the public realm

Streets and open spaces, collectively known as the *public realm*, are a major factor in

the character of conservation areas, yet the management of the public realm takes place largely outside the planning system, with control often resting with the relevant County Council. Conservation areas can be particularly vulnerable to the loss of traditional paving materials and street furniture, and the imposition of unsympathetic modern materials and details which do not reinforce the area's sense of 'local distinctiveness'. A plethora of street signs and other street clutter such as litter bins, planters, statutory undertaker's service boxes and such other equipment, all dilute a conservation area's special character. Careful control and the support of the local community are a vital part of achieving improvements to the public realm in any conservation area.

Streetscape Manual

It is important that Gravesham Borough Council should establish protocols with the highways authority (Kent County Council) and other stakeholders for the treatment of the public realm in all of their conservation areas. English Heritage has provided a general manual for streetscapes in the South East Region in its *Streets for All* initiative. This urges local authorities to establish more detailed strategies for the care and enhancement of the public realm within their conservation areas. Kent County Council has produced a Kent Design Initiative which contains guidance on appropriate treatments in conservation areas.

- **ACTION 13:** *The Council will work with Kent County Council to prepare a Streetscape Manual for the historic areas of Gravesham. This should include the identification of suitable materials for paving, road surfaces, street furniture, and street lighting.*

Traffic signs and street lights

Modern signs and notices can spoil the visual attractiveness of a conservation area. While signs, such as direction signs or parking signs, are necessary in areas open to motor traffic, over-provision of signage should be avoided. Where possible, street signage should therefore be kept to a minimum and carefully sited to avoid intruding on the sensitive historic environment.

The character appraisals have also identified the lack of a cohesive style of street lamp throughout the three conservation areas, and in visual terms it would be ideal if a consistent height and lamp design were introduced incrementally as street lighting improvements are carried out.

- **ACTION 14:** *Working in partnership with Kent County Council, and resources permitting, the Borough Council will seek improvements to traffic signage and street lighting in the conservation areas of Gravesend.*

3.7 Trees and landscape management

Trees make an important contribution to the suburban character of the conservation areas. A 'Tree Management Plan', that considered issues of amenity, practicality and, importantly, succession planning would reduce the need to take ad hoc decisions on a case-by-case basis. Of note is the need to discuss with Kent County Council the question of the control of street trees, particularly pollarding. A Management Plan, which will also bring the Council's list of Tree Preservation Orders up to date, will be subject to the necessary funding being available.

- **ACTION 15:** *Subject to the availability of resources, the Council will consider developing a Management Plan for the trees in Gravesend to recognise the contribution they make to the character of the historic environment, and make recommendations for lopping, removal or replacement. The Council will encourage Kent County Council to replace street trees where these were part of the original street layout and have been lost, or for new trees where they would complement the historic environment.*

3.8 The production of detailed guidance

Gravesend Borough Council has provided guidance notes for the general public on 'Conservation Areas' and 'Listed Buildings', both adopted in 2005. These give the general public advice on these designations but may require updating soon. Further guidance on shopfronts and the design of traditional windows and doors is currently (December 2007) being prepared for adoption.

- **ACTION 16:** *The Council will consider preparing and issuing additional design guidance and leaflets as and when appropriate. This could include the following:*
 - The importance of historic details and traditional materials,
 - Protecting front gardens and boundary treatments,
 - The control of trees,
 - Loft conversions/ Dormer windows/ Rooflights,
 - Renewable energy (solar panels and wind turbines) and historic buildings.

English Heritage and other organisations such as the Society for the Protection of Ancient Buildings (SPAB), The Victorian Society, and The Georgian Group, provide an excellent range of technical advice leaflets regarding listed buildings, traditional construction methods and materials. Contact details are provided at Appendix 6. Some of these leaflets, such as 'A Stitch in Time', a joint publication by the SPAB and the Institute of Historic Building Conservation (IHBC), provides particularly helpful information about traditional methods of repair and the importance of regular maintenance.

4. POLICIES FOR THE CONTROL OF THE HISTORIC ENVIRONMENT

4.1 Introduction

There is an increasing emphasis in planning policy on issues relating to the historic environment, and this is particularly important in the Borough of Gravesend, with its 24 conservation areas and more than 450 listed building entries. The Borough includes two major urban settlements, Northfleet and Gravesend, as well as a variety of attractive rural villages including such diverse settlements as Cobham, Meopham and the hamlet of Thong. Most of these are now designated as conservation areas. In addition, there are nine Scheduled Monuments in the Borough, including several which relate to the past use of Gravesend as a fortification and as a centre for industry and manufacturing.

It is important that this historic environment continues to be recognised and that local policies are included in the emerging Local Development Framework or accompanying documents for their future protection. Most particularly, this could include the preparation of a Local List of significant buildings (see 4.2) for the whole Borough, and the incremental preparation of Conservation Area Character Appraisals and Management Proposals for all of Gravesend's conservation areas in due course. Additionally, the Council needs to ensure that all historic buildings within the Borough are well maintained and kept in a good state of repair, including making use of appropriate legislative powers to tackle poorly maintained buildings or sites, and Discontinuance Notices for poor quality advertisements.

- **Policy 1:** *The Borough Council will continue to promote the historic environment and will ensure that appropriate policies are included in the emerging LDF and accompanying documents;*
- **Policy 2:** *The Council will encourage owners to undertake improvements and maintenance to their buildings, particularly where they lie within conservation areas or can be considered historic;*
- **Policy 3:** *The Borough Council will continue to make use of appropriate legislative powers to address cases where owners have consistently failed to maintain their properties, to the detriment of the surrounding environment;*
- **Policy 4:** *The Borough Council will consider serving Discontinuance Notices where owners or tenants have installed poor quality signage or advertising of whatever kind.*

4.2 The control of historic buildings

Listed Buildings

Listed building Consent is required for the demolition, alteration or extension of statutorily listed buildings. The policy context for this is set by central government in PPG15. National policy is also given a local perspective in the Local Plan and in the emerging LDF. There is current guidance for owners of listed buildings within the Borough on the Borough Council's website but this needs to be up-dated and expanded, as necessary.

- **Policy 5:** *The Borough Council will continue to assess applications for Listed Building Consent in line with Borough Council policy and guidance*

provided in PPG15 including the preparation, where appropriate, of an archaeological evaluation.

Locally listed buildings

Government advice is that the preparation of a List of Locally Significant Buildings is a useful planning tool. "Locally Listed" buildings are valued for their contribution to the local scene, or for their local historic associations, but are not considered to be of national importance, so they are usually not eligible for statutory listing. Policies to control them can be included in the Local Development Framework.

Gravesend Council does not currently maintain a formal list of locally significant buildings (usually called the 'Local List') either in Gravesend or elsewhere, although all buildings that were identified in the 1974 Listed Buildings Survey for their architectural or historic interest, but were not awarded a listing status, have been treated as 'Buildings of Local Interest' ever since when considering planning applications. Given the increasing interest in local listing nationally, as particularly expressed in the government's Heritage White Paper ⁴, it is recommended that the Borough Council should develop a new Local List in order to give better recognition to the unique local historic environment. The first step is for the Borough Council to agree criteria for the selection of buildings and structures for the Local List. Buildings can be added to the list as circumstances allow, for instance through the conservation area appraisal process, or by a systematic survey of the whole borough. Community involvement in the selection process will add weight to the list

⁴ Department for Culture, Media and Sport – *Heritage protection for the 21st century* – March 2007

as a planning tool. It will also be necessary to acknowledge the Local List in planning policy and state the circumstances in which it will affect planning decisions.

- **Policy 6:** *The Borough Council will consider the preparation of a Local List subject to the availability of resources, preparation to include:*
 - *Adopting appropriate criteria;*
 - *Including provision for local listing in planning policy;*
 - *Involving communities in the selection of buildings and structures.*

Key Unlisted buildings

Conservation area character appraisals identify buildings that make a positive contribution to the character of the conservation area. In general, all listed and locally listed buildings in a conservation area will be regarded as 'positive'. However, there are often many more that, together, underpin the special interest of a place.

Government policy (as set out in PPG15) is for a presumption in favour of retaining positive buildings and any proposals for their demolition must be considered against criteria similar to those for the demolition of listed buildings. It is important that owners and occupiers of property in conservation areas should be aware of whether their buildings are regarded as positive and also how applications for change or demolition will be judged.

- **Policy 7:** *The Council will ensure that local publicity for conservation areas will make clear the consequences of designation including the presumption in favour of retaining positive buildings;*

- **Policy 8:** *Applications for the demolition of any 'positive' building in a conservation area will be assessed in a similar way to applications to demolish a listed building, and the applicant will be expected to demonstrate why the building is beyond economic repair, and to prove that it has been offered on the open market as an alternative to demolition.*

4.3 The control of conservation areas

It has already been described how current legislation affects conservation areas including the need to designate, appraise and manage them effectively. Apart from guidance contained in PPG 15, local policies also set out how the Borough Council will continue to monitor change and provide a rigorous planning regime.

- **Policy 9:** *The Borough Council will continue to carefully control all conservation areas within the Borough including, subject to the availability of resources, reviewing the areas' boundaries, providing Character Appraisals with Management Proposals on a five year cycle, and considering new areas for designation.*

4.4 The control of Scheduled Monuments and other archaeological features

Scheduled Monument Consent is currently required from English Heritage for all works which affect a Scheduled Monument. The requirements for Consent are rigorous and even quite minor changes require Consent. Owners of Scheduled Monuments must therefore contact English Heritage before commencing any work. Advice can also be provided by the archaeological team at Kent

County Council.

Many of the Borough's conservation areas are intrinsically of archaeological potential and developers may be required to provide an Archaeological Evaluation before applications for development are determined by the Borough Council. Additionally, developers may be required by planning conditions to pay for an archaeological watching brief throughout the development in case archaeological features are revealed. These constraints may also apply to other sites outside conservation areas.

- **Policy 10:** *The Borough Council will continue to monitor applications for development which affect Scheduled Monuments or sites of archaeological potential extremely carefully, and such applications may be refused if it appears that the archaeological site is under threat in any way.*

4.5 Article 4 Directions

As detailed in Section 2 above, family houses have considerable permitted development rights that enable some alterations to be carried out without the need to obtain planning permission. These works include, for example, changes to doors, windows, roof materials or rainwater goods and the construction of minor extensions. Although they may be minimal in each case, such alterations can have a cumulative effect that is damaging to historic areas. For this reason the Council has served Article 4 (2) Directions in each of the three Conservation Areas.

In practice, the Directions mean that nearly all minor building works or alterations which affect the appearance of a building and its surroundings need planning permission.

The aim of the Directions is to prevent harmful changes and encourage careful repair of original features; therefore, like-for-like repairs will not need permission/approval. These restrictions normally only apply to those parts of the property which front a highway, a public footpath or open space.

Permission is needed for the following development:

- Enlargement, improvement or other alteration to a property;
- Altering or removing existing chimneys or constructing new ones;
- Roofs – changing existing roofing materials and inserting roof lights;
- Walls – painting, rendering, pebbledashing walls or changing architectural features such as cornices, window surrounds etc, and the installation of satellite dishes;
- Window and doors – altering existing windows or doors or installing new ones, including a porch;
- Constructing hard surfaces;
- Boundary fences – removal, construction of walls and gates, alterations of gates, fences and walls;
- Boundaries – removal or construction of walls and gates, alteration of gates, fences and walls;
- Sheds/storage – the erection of sheds or oil storage tanks etc

For more information, contact the Planning Team at the Borough Council.

Some considerable extensions are planned to the Darnley Road Conservation Area and in terms of consistency in planning approach it will be important that an Article 4 (2) Direction is also served for these areas in due course.

4.6 Buildings at Risk and Section 215 Notices

There are only two entries on the English Heritage *Buildings At Risk Register* for the Borough of Gravesend, neither of which lie within Gravesend. The Register only covers grade I and grade II* listed buildings, which account for a very small percentage of the many listed buildings in the Borough.

However, a number of listed properties have been noted during the survey work for the character appraisals in Gravesend which are vacant or part-vacant, and appear to be at risk. No.1a/1b Harmer Street and the coach houses to the rear of no. 6 and 8 Harmer Street are all particularly in urgent need of repair and legal action may be required to secure their future in due course. The Borough Council has also established an Empty Properties Working Group, to record and monitor vacant properties, and will consider the use of relevant legislative powers in appropriate cases to ensure that these sites and buildings are improved.

- **Policy 11:** *Subject to the availability of resources, The Borough Council will consider the preparation of a borough-wide listed Building at Risk list which will be monitored on a regular basis, and subject to resources, will consider using appropriate legislative powers to secure remedial action.*
- **Policy 12:** *Subject to the availability of resources, the Borough Council will consider using its legislative powers to prevent sites and buildings, particularly within the Borough's conservation areas, becoming detrimental to their surroundings.*

5. SITE SPECIFIC ACTIONS

In addition to the general proposals for action and policies which are detailed in the proceeding chapters, specific issues face each of the three conservation areas and have been identified in the relevant Character Appraisal for each.

5.1 Darnley Road Conservation Area

5.1.1 Conservation Area boundary review

The boundary of the Conservation Area could be extended southwards to Old Road to include the remainder of the 19th century housing located along Darnley Road. Weavers Close should be left outside of the new boundary.

Nos. 2-6 Pelham Road could be transferred to the Pelham Road/The Avenue Conservation Area.

No. 35a Arthur Street should be considered for exclusion from the Conservation Area.

5.1.2 Site and building enhancements

The character appraisal acknowledges that a number of enhancements to buildings and the public realm in the Conservation Area have been made in recent years. However, further improvements could be made by the replacement of buildings marked as negative on the Townscape Appraisal map with buildings of more sympathetic design. Also, buildings that make a negative or neutral contribution to the character of the Conservation Area could be enhanced through general repair and maintenance. Other specific sites and buildings that would benefit from enhancement include:

The rears of nos. 69-105 Darnley Road on the back lane running between Arthur Street and Trafalgar Road

- Some degree of order must be introduced if the special character of this area is to be restored. The backs of these buildings are particularly unattractive due to poor quality modern outbuildings, rubbish bins, parked cars, unkempt spaces, poor quality paving and loss of traditional boundaries. There is a general air of neglect. The restoration or introduction of brick boundary walls and the maintenance of the few remaining historic outbuildings would all enhance the area.

Garages at no. 27 and 31 Darnley Street, no. 29 Cobham Street, no. 15 Wrotham Road, and garages next to no. 48 Darnley Street

- These buildings detract from the character of the area through a combination of poor quality design, neglect, and poor quality surfacing materials for the hardstandings. Some of them have suffered from vandalism such as graffiti. The use of traditional materials for the structures and improved landscaping would enhance these areas.

No. 84 Darnley Road

- The reuse of this building would safeguard its future from vandalism and neglect.

Nos. 21-27 Darnley Road

- The forecourt area in front of this parade of shops is surfaced with a mixture of modern materials, principally concrete, and used for

vehicle parking. The area could be enhanced through improved landscaping.

Vacant plot to the north of no. 76 Darnley Road

- This plot is surrounded by a neglected wire-mesh fence. The introduction of a new fence would enhance the appearance of the plot, and prevent it appearing as waste land.

5.1.3 Shop fronts

The Conservation Area contains a parade of shops at nos. 21-27 Darnley Road, all of which have modern shop fronts, although many feature traditional styles and proportions. In some cases, poorly designed shop fronts have little regard for the host building and this adversely affects the whole streetscene. The publication of the Borough Council's *Shopfront Design* guidance will help to improve the design of new shopfronts as planning applications are made for their renewal.

5.1.4 Amenity Space

There is one main area of public open space in the Conservation Area, the triangular green at the junction of Darnley Road and Pelham Road. The green was originally part of the ponds and garden of the Manor Farm, associated with the Earl of Darnley's manor house. The area should be maintained and enhanced to maximise the contribution that it makes to the appearance and character of the Conservation Area. Uses that detract from the amenity of the area, such as the placement of temporary storage containers, should be prevented.

5.1.5 Traffic signs, street lights and the public realm

Recent grant schemes and other schemes of enhancement have successfully restored much of the town centre's traditional character. The extension of this scheme to the suburban Conservation Areas, including new items of street furniture such as CCTV cameras or waste bins, should respect the historic character of the Darnley Road Conservation Area in terms of design, scale and finished appearance. Street lamps and camera posts should not be so tall that they visually compete with the roofline of historic buildings or with the crowns of trees. New works to the public realm should ideally be constructed using traditional materials and similarly traditional colour schemes should be specified, for instance, for bollards or other street furniture.

Paving and surface materials throughout the area are of mixed quality and use a variety of materials. A comprehensive upgrading of the pavements, particularly in Cobham Street and Darnley Street, would enhance the area and reinforce the historic identity of the Conservation Area.

5.1.6 Statutory and local list

Whilst some of the historic buildings in the Conservation Area are already included in the statutory list, others do not fit the strict criteria for listing but are important in the local area. The Council holds an out-of-date list of buildings of local interest in the borough. A new Local List could be adopted in the future with policies for the retention of these buildings.

5.1.7 Traffic and pedestrians

The Darnley Road Conservation Area is principally a suburban residential area, but one that is located close to the town centre. Parking is an issue in the Conservation Area, with large numbers of vehicles both of residents and visitors. This has resulted in a rise in off-street parking with the associated loss of front gardens and boundary walls. Parking restrictions and their outcome should be monitored and reviewed.

A previous traffic calming scheme in Cobham Street and Darnley Street has eased some of the highways problems in these roads, and traffic and parking is also managed effectively in Darnley Road. However, the potential introduction of new traffic controls and highway signage in the future requires careful consideration to ensure the successful retention of the character and appearance of the Conservation Area. Additionally, existing pavements and crossings must be kept maintained and the long term aim should be to improve pedestrian movement through the conservation area.

5.1.8 Trees and landscape

It is important that existing trees, both on privately owned land and within the public realm, are retained and cared for. Where new development is proposed which would result in the removal of trees, a Landscaping Scheme must be supplied as part of the planning application showing how the trees will be replaced in the future.

5.2 Pelham Road/The Avenue Conservation Area

5.2.1 Conservation Area boundary review

Amend the boundary as follows:

- Include the remaining late 19th century houses in the north of Pelham Road (nos. 2 to 14) as these belong historically and architecturally to this Conservation Area. Their inclusion would allow the boundary to be extended to include the grade II listed Bronte School (Mayfield) and some important surviving large detached houses on the west side of Pelham Road.
- Transfer nos. 2 to 6 Pelham Road from the Darnley Road Conservation Area as these properties relate more to the Pelham Road/The Avenue Conservation Area in terms of their orientation and architecture.
- It is suggested to combine the Darnley Road Conservation Area and the Pelham Road/ The Avenue Conservation Area, as the two areas have a common appearance and development history. A new Conservation Area that encompassed all of these roads would remove the need to make arbitrary decisions on where boundaries should be drawn along connecting roads such as Lennox Road East.

5.2.2 Site and building enhancements

The character appraisal acknowledges that a number of enhancements to buildings and the public realm in the Conservation Area have been made in recent years. However, further improvements could be made by the replacement of buildings marked as negative on the Townscape Appraisal map with buildings of more sympathetic design. Also, buildings that make a negative or neutral contribution to the character of the

Conservation Area could be enhanced through general repair and maintenance. Other specific sites and buildings that would benefit from enhancement include:

No. 55 Pelham Road

- The appearance and character of this important unlisted building has been eroded through the loss of the original timber windows and unsympathetic alterations, such as to the gables. The reinstatement of lost architectural features would significantly enhance the appearance of the building.

No. 25 Pelham Road

- The extensive front garden of this building, now a Driving Test Centre, has been covered by tarmac to create vehicle parking. This has been detrimental both to the setting of one of the largest former houses in the Conservation Area, but also to the general amenity of the streetscene. The introduction of an appropriate landscaping treatment, with selective areas of planting, would help to soften the appearance of the car park.

The White Post Public House, Pelham Road

- The reuse of this building, which is currently vacant and boarded-up, would safeguard its future from vandalism and neglect.

5.2.3 Advertisement control

PPG 15 recognises that all outdoor advertisements affect the appearance of the building or neighbourhood where they are displayed. Currently, the visual appearance suffers from the garish advertisement as at no. 17 Pelham Road, which will need to be

carefully controlled.

5.2.4 Traffic signs, street lights and the public realm

Recent grant schemes and other schemes of enhancement have successfully restored much of the town centre's traditional character. The extension of this scheme to the suburban Conservation Areas, including new items of street furniture such as CCTV cameras or waste bins, should respect the historic character of the Pelham Road/The Avenue Conservation Area in terms of design, scale and finished appearance. Street lamps and camera posts should not be so tall that they visually compete with the roofline of historic buildings or with the crowns of trees. New works to the public realm should ideally be constructed using traditional materials and similarly traditional colour schemes should be specified, for instance, for bollards or other street furniture.

Paving and surface materials throughout the area are of mixed quality and use a variety of materials. A comprehensive upgrading of the pavements would enhance the area and reinforce the historic identity of the Conservation Area.

5.2.5 Statutory and local list

Whilst some of the historic buildings in the Conservation Area are already included in the statutory list, others do not fit the strict criteria for listing but are important in the local area. The Council holds an out-of-date list of buildings of local interest in the borough. A new Local List could be adopted in the future with policies for the retention of these buildings.

5.2.6 Archaeology

One part of the Conservation Area, the area of Bycliffe Terrace and Pelham Terrace, falls within one of Kent County Council's designated Areas of Archaeological Potential, so it is likely that the Borough Council will require an Archaeological Evaluation to accompany any planning application.

5.2.7 Traffic and pedestrians

Traffic is well-regulated in the Pelham Road/ The Avenue Conservation Area. However, the potential introduction of new traffic controls and highway signage in the future requires careful consideration to ensure the successful retention of the character and appearance of the Conservation Area.

The zebra crossing on Pelham Road aids pedestrian movement through the Conservation Area. Existing pavements must be kept maintained and the long term aim should be to improve pedestrian movement through the conservation area.

5.2.8 Trees and landscape

It is important that existing trees, both on privately owned land and within the public realm, are retained and cared for. Where new development is proposed which would result in the removal of trees, a Landscaping Scheme must be supplied as part of the planning application showing how the trees will be replaced in the future. Mature trees line Lennox Road East, The Avenue and the west side of Pelham Road and the production of a Tree Management Strategy for those trees in the public realm would reduce the need to take ad hoc decisions on a case-by-case basis, on issues such as sensitive lopping and succession planting.

5.3 Windmill Hill Conservation Area

5.3.1 Site and building enhancements

The character appraisal acknowledges that a number of enhancements to buildings and the public realm in the Conservation Area have been made in recent years. However, further improvements could be made by the replacement of buildings marked as negative on the Townscape Appraisal map with buildings of more sympathetic design. Also, buildings that make a negative or neutral contribution to the character of the Conservation Area could be enhanced through general repair and maintenance. Other specific sites and buildings that would benefit from enhancement include:

Flats, garages and car park at no. 36 Clarence Place

- The group of flats at no. 36 Clarence Place are infill development dating from the 1960s or 70s. Located immediately to the north of the flats is a forecourt containing two blocks of garages. These buildings are of a design and materials that neither reflect nor enhance the Conservation Area. The car park is surfaced with concrete. The introduction of an appropriate landscaping scheme would improve the appearance of the area in the short term, and in the long-term the Borough Council would support the replacement of these buildings with structures of architectural merit.

Rear of Primrose Terrace, with garages and outbuildings facing South Hill Road

- Some degree of order must be introduced to these areas if their 19th century special character is to be

restored. The backs of these buildings are particularly unattractive due to a plethora of poor quality modern outbuildings, rubbish bins, parked cars, unkempt spaces, poor quality paving and boundaries, and a general air of neglect. The restoration or introduction of brick boundary walls and the maintenance of the few remaining historic outbuildings would all enhance the area.

Front access path to Primrose Terrace

- The path that provides the approach to the front of Primrose Terrace is unstable due to subsidence of the bank below. The path is a historic access and an attractive pedestrian thoroughfare; its repair and re-landscaping would enhance the appearance of this part of the Conservation Area.

No. 16 Clarence Place

- The reuse of this vacant building would safeguard its future from vandalism and neglect.

The Scout Hall at the junction of Sandy Bank Road and Leith Park Road

- This structure was erected as a semi-permanent building. It now requires maintenance and upgrading works to ensure that it makes a positive contribution to the Conservation Area.

The Kingdom Hall

- The Kingdom Hall on Shrubbery Road is soon to be vacated. This could offer the opportunity for the site to be redeveloped. Any new development should be of the highest quality design and should respect the historic scale of the neighbouring buildings. The use

of sympathetic materials and details, and the protection of views into and out of the Conservation Area, are also paramount.

Siri Guru Nanak Darbar Gurdwara

- This Sikh place of worship will be vacated once the new temple is completed on Khalsa Drive. It is vital that a new use is found for the building at this time to safeguard this Local Interest building from vandalism and neglect.

Pumping Station, Leith Park Road

- The poor visual quality of the building and its curtilage detract from the character of the area. The re-location of the pumping station and the sensitive re-development of the site would be desirable, but if this cannot be achieved, the replacement of the security fencing with a more sympathetic boundary could already bring about an improvement to the area.

5.3.2 Amenity Space

There are a variety of public open spaces within the Conservation Area. The three principal areas of public open space are: Christ Church Gardens, Windmill Hill Gardens and Windmill Hill. These areas should be maintained and enhanced to maximise the contribution that they make to the appearance and character of the Conservation Area. In particular, the summit area of Windmill Hill requires attention to counteract the incremental impact of vandalism on features such as benches and signage.

5.3.3 Traffic signs, street lights and the public realm

Recent grant schemes and other schemes of enhancement have successfully restored much of the town centre's traditional character. The extension of this scheme to the suburban Conservation Areas, including new items of street furniture such as CCTV cameras or waste bins, should respect the historic character of the Windmill Hill Conservation Area in terms of design, scale and finished appearance. Street lamps and camera posts should not be so tall that they visually compete with the roofline of historic buildings or with the crowns of trees. New works to the public realm should ideally be constructed using traditional materials and similarly traditional colour schemes should be specified, for instance, for bollards or other street furniture.

Paving and surface materials throughout the area are generally of good quality and utilise traditional materials, due to a recent programme of refurbishment works carried out by the Council. It would be of benefit to the identity of the Conservation Area if the upgrading works were extended to all of the thoroughfares in the Conservation Area.

5.3.4 Statutory and local list

Whilst some of the historic buildings in the Conservation Area are already included in the statutory list, others do not fit the strict criteria for listing but are important in the local area. The Council holds an out-of-date list of buildings of local interest in the borough and there are some likely candidates for a new Local List in this conservation area, such as some of the unlisted buildings on the west side of Windmill Street. A new Local List could be

adopted in the future with policies for the retention of these buildings.

5.3.4 Archaeology

Part of the Windmill Hill Conservation Area, the western slope of Windmill Hill, has been identified by Kent County Council as an *Area of Archaeological Potential*, so it is likely that the Borough Council will require an Archaeological Evaluation to accompany any planning application.

5.3.5 Traffic and pedestrians

The Windmill Hill Conservation Area is principally a suburban residential area, but one that is located close to the town centre. Parking is an issue in the Conservation Area, with large numbers of vehicles both of residents and visitors. This has resulted in a rise in off-street parking with the associated loss of front gardens and boundary walls. Parking restrictions and their outcome should be monitored and reviewed.

Two of the routes within the Conservation Area, Windmill Street and Parrock Road, are busy arterial roads into the town centre. In addition, Clarence Place is used as a cut-through road between the two. Such high levels of traffic, particularly on the relatively narrow, and tranquil, Clarence Place, have a detrimental impact on the character of the Conservation Area. The potential introduction of new traffic controls and highway signage in the future requires careful consideration to ensure the successful retention of the character and appearance of the Conservation Area. Additionally, existing pavements and crossings must be kept maintained and the long term aim should be to improve pedestrian movement through the conservation area.

5.3.6 Trees and landscape

It is important that existing trees, both on privately owned land and within the public realm, are retained and cared for. Where new development is proposed which would result in the removal of trees, a Landscaping Scheme must be supplied as part of the planning application showing how the trees will be replaced in the future.

6. DELIVERING THE MANAGEMENT PROPOSALS

6.1 Introduction

It is important that the three conservation areas which lie on the edge of Gravesend town centre should continue to be improved and enhanced and that no further losses of historic features, including buildings and open spaces, are allowed. Achieving the difficult balance between economic vitality and positive change, and the protection of the vulnerable historic environment, must surely be the principal challenge for the Borough Council at the beginning of the 21st century. Constant, and most importantly consistent, management to control any necessary changes is needed so that the special character and appearance of each of the conservation areas is not adversely affected.

The Conservation Area Character Appraisals have identified the varied issues facing these areas, many of which are common to all of them. These issues can be addressed by the Borough Council utilising the full range of available policies provided by national guidance and the emerging LDF, as well as the generic actions recommended in Section 3, the policies recommended in section 4, and the site specific actions recommended in section 5.

These recommendations can only be effective, however, if they are actually implemented. A draft Action Plan at Appendix 3 sets out the principal tasks in immediate, medium and long-term timescales over the next few years. Following full public and stakeholder consultation, it may be considered appropriate for the Borough Council to prepare a more detailed Action Plan for the town centre which will include other initiatives,

such as the work currently taking place under the Heritage Quarter banner. Indeed, any Action Plan should be seen as part of an evolving process and regular monitoring and evaluation of possible actions forms part of the successful implementation of any Action Plan. As with any programme, it is also important that responsibility for the actions is accepted by the various stakeholders and that any detailed Action Plan assigns tasks to specific teams or individuals so that they can be included in their work programmes.

6.2 Expectations

Gravesend Borough Council

The designation and review of conservation areas are legal requirements. In support of these statutory duties, the Borough Council can be expected to commit adequate resources by ensuring it has access to the necessary skills and that it adopts appropriate policies. It should also ensure that communities are sufficiently informed about the implications of designation so that they too can play their part. The public meetings which have been held in association with the production of the Character Appraisals, and the extensive public consultation on those documents and these Management Proposals, should help to ensure that the community of Gravesend feels a sense of ownership of the documents. This will help ensure that the recommendations can be implemented effectively and with full public support.

Although the administration of conservation areas is largely a planning function, there are many other actions that can impact on character and appearance, for instance the maintenance of public buildings and highways. It is important, therefore, that

Borough Council departments and their partners ensure that existing controls, such as planning permissions, building control, fire regulations and highways standards, are applied in the best interests of the conservation areas. Standards designed for modern environments should not be applied unthinkingly to conservation areas and buildings that have stood the test of time. The Borough Council can therefore be expected to be sensitive to the special interest of the Gravesend conservation areas and their many listed buildings in exercising development control. The same can be expected for the South Thames Gateway Building Control Partnership which provides the building control services for the borough. Similarly, the Fire Officer, who administers the requirements of the fire regulations, and Kent County Council Highways Department, who have responsibility for highways matters, should also be aware of the need to 'preserve or enhance' the historic environment. The appointment of an Historic Environment Champion, as recommended in 3.1, would also assist the Borough Council in achieving its conservation objectives.

Owners and residents

Those who live and work in the conservation areas are expected to recognise the collective benefits they enjoy. For this, they must understand the need to take a contextual view of any proposals, rather than acting in isolation. Some degree of change is inevitable in conservation areas and the issue is often not so much whether change should happen, but how it is undertaken. Owners and residents can minimise the likelihood of their proposals being rejected by employing skilled advice when preparing development proposals, by avoiding unrealistic aspirations, and by consulting with the Borough Council

conservation team at an early stage in the formulation of their proposals.

Community involvement

It is important that communities are well-informed about the qualities of their conservation areas and of the opportunities for enhancing them. While the Borough Council is a useful source of advice, there is a significant role for amenity societies and other stakeholders to explain what matters, what is possible, what is expected and what has been achieved elsewhere. Indeed, this document has been drawn up with the help and co-operation of local residents and representatives from the business community.

6.3 Programme

It should be noted that the delivery of all of the recommendations in this document depend on the availability of staff resources within the Borough Council, and that some of them are also dependent on external funding, so the implementation of some actions may be delayed or may even have to be abandoned.

Appendix 3 contains a draft Action Plan for the implementation of these recommendations. Immediate tasks are generally those that can be adopted without reference to other programmes including resource planning. They should be capable of being completed within the next year. Medium-term goals are those that require preparation but could be implemented within the next 1-3 years.

6.4 Commitment and adoption

It is important that the Borough Council and its partners should commit themselves corporately to the delivery of an Action Plan based on these Management Proposals so

that individual tasks are built in to the work programmes of teams and individuals.

It is also important that the Character Appraisals and the Management Proposals are adopted by the Borough Council as Development Plan Documents (DPP) so that they inform the Local Development Framework and carry due weight in the consideration of planning proposals.

6.5 Monitoring and review

The efficient delivery of a conservation service and the implementation of the recommendations included in these Management Proposals require regular monitoring. The Borough Council is therefore expected to undertake:

- The application of conservation policies in a fair and consistent way;
- The continuous monitoring of the Borough Council methods and procedures to ensure that the historic environment is being adequately controlled;
- The monitoring of change within the three conservation areas including the updating of a photographic baseline, which should never be more than five years old;
- The review of the three Conservation Area Character Appraisals and management proposals on a five-year basis.

APPENDICES

Appendix 1

SUMMARY OF GENERIC ACTIONS

The development control process

ACTION 1: The Borough Council will adopt a consistent interpretation of what it considers to be a 'material' change, particularly in conservation areas.

Promotion and awareness

ACTION 2: The Council will encourage a good understanding of historic environment issues across its departments and promote consistent decision making by encouraging both staff and councillors to take advantages of training opportunities through such schemes such as English Heritage's HELM initiative.

Conservation advice within the Borough Council

ACTION 3: The Council will consult its conservation officer on all development control proposals affecting the character of conservation areas and their setting.

New development

ACTION 4: Overall, the Council will:

Encourage pre-application discussions,

Ensure that applications are accompanied, where appropriate, by detailed 'Conservation Statements',

In Conservation Areas, where the appearance of a building has suffered from the loss of original architectural features and

unsympathetic alterations, the Council will seek the reversal of unsympathetic alterations and the re-instatement of appropriate traditional architectural features using traditional materials as part of a planning application,

In conservation areas, the Council will encourage the replacement of buildings identified on the Townscape Appraisal Map as making a negative contribution to the character and appearance of the conservation area.

The role of an Historic Environment Champion

ACTION 5: The Borough Council will consider appointing an Historic Environment Champion to raise the profile of heritage issues within the Council.

Community involvement

ACTION 6: The Borough Council will seek stronger ties with local bodies and interest groups and promote the continued involvement of the local community in managing and enhancing the character of its conservation areas.

ACTION 7: The Borough Council will reach out to all sections of the community in its consultation process and use reasonable means in which to engage as many different groups and individuals as possible. An assessment of the impact of the Council's policies on all sections of the community will also be carried out.

ACTION 8: The Borough Council could consider establishing a Conservation Area Advisory Committee to provide detailed advice on policies and applications which affect the Borough's conservation areas.

Shopfronts and advertising

ACTION 9: The Borough Council will publish detailed guidance on shopfront design and advertisements in historic areas.

ACTION 10: The Council will ensure that all proposed advertisements accord with Policy TC8 of the Local Plan and the subsequent relevant policies that will be adopted in the forthcoming LDF.

ACTION 11: When considering planning applications for new shopfronts, the Council will be mindful of Policy TC9 in the Local Plan (and any subsequent relevant policy in the emerging Local Development Framework).

Regeneration and the role of grant aid

ACTION 12: Subject to the availability of resources, the council will consider re-introducing grant aid for historic buildings, either as a council run scheme or to attract and lever in external funding from others such as English Heritage and Heritage Lottery Fund.

Highways and the public realm

ACTION 13: The Council will work with Kent County Council to prepare a Streetscape Manual for the historic areas of Gravesham. This should include the identification of suitable materials for paving, road surfaces, street furniture, and street lighting.

ACTION 14: Working in partnership with Kent County Council, and resources permitting, the Borough Council will seek improvements to traffic signage and street lighting in the conservation areas of Gravesham..

Trees and landscape management

ACTION 15: Subject to the availability of resources, the Council will consider developing a Management Plan for the trees in Gravesend to recognise the contribution they make to the character of the historic environment, and make recommendations for lopping, removal or replacement. The Council will encourage Kent County Council to replace street trees where these were part of the original street layout and have been lost, or for new trees where they would complement the historic environment.

The production of detailed guidance

ACTION 16: The Council will consider preparing and issuing additional design guidance and leaflets as and when appropriate. This could include the following:

The importance of historic details and traditional materials

Protecting front gardens and boundary treatments

The control of trees

Loft conversions/ Dormer windows/ Rooflights
Renewable energy (solar panels and wind turbines) and historic buildings

Appendix 2 SUMMARY OF POLICIES

Control of the historic environment

Policy 1: The Borough Council will continue to promote the historic environment and will ensure that appropriate policies are included in the emerging LDF and accompanying documents.

Policy 2: The Council will encourage owners to undertake improvements and maintenance to their buildings, particularly where they lie within conservation areas or can be considered historic..

Policy 3: The Borough Council will serve S215 Notices where owners have consistently failed to maintain their properties, to the detriment of the surrounding environment.

Policy 4: The Borough Council will consider serving Discontinuance Notices where owners or tenants have installed poor quality signage or advertising of whatever kind.

The control of historic buildings

Listed Buildings

Policy 5: The Borough Council will continue to assess applications for Listed Building Consent in line with Borough Council policy and guidance provided in PPG15 including the preparation, where appropriate, of an archaeological evaluation.

Locally listed buildings

Policy 6: The Borough Council will ensure that resources are allocated to the preparation of a Local List including:

Adopting appropriate criteria

Including provision for local listing in planning policy

Involving communities in the selection of buildings and structures

Key Unlisted buildings

Policy 7: The Council will ensure that local publicity for conservation areas will make clear the consequences of designation including the presumption in favour of retaining positive buildings;

Policy 8: Applications for the demolition of any 'positive' building in a conservation area will be assessed in a similar way to applications to demolish a listed building, and the applicant will be expected to demonstrate why the building is beyond economic repair, and to prove that it has been offered on the open market as an alternative to demolition.

The control of conservation areas

Policy 9: The Borough Council will continue to carefully control all conservation areas within the Borough including, subject to the availability of resources, reviewing the areas' boundaries, providing Character Appraisals with Management Proposals on a five year cycle, and considering new areas for designation.

The control of Scheduled Monuments and other archaeological features

Policy 10: The Borough Council will continue to monitor applications for development which affect Scheduled Monuments or sites of archaeological potential extremely carefully, and such applications may be refused if it

appears that the archaeological site is under threat in anyway.

Buildings at Risk and Section 215 Notices

Policy 11: Subject to the availability of resources, The Borough Council will consider the preparation of a borough-wide listed Building at Risk list which will be monitored on a regular basis, and subject to resources, will consider using appropriate legislative powers to secure remedial action.

Policy 13: Subject to the availability of resources, the Borough Council will consider using its legislative powers to prevent sites and buildings, particularly within the Borough's conservation areas, becoming detrimental to their surroundings.

Appendix 3 ACTION PLAN

IMMEDIATE (within the first year)

Action:	Achieved by:	Responsibility:
Adoption:	Adopt the three conservation area Character Appraisals as 'informative documents' for the LDF and the accompanying Management Proposals as a Supplementary Planning Document	Planning and Regeneration Department GBC
Designations:	Amend the conservation area boundaries to Darnley Road and Pelham Road/ The Avenue as recommended in the Character Appraisals	Planning and Regeneration Department GBC
Conservation management :	Consider the appointment of an Historic Environment Champion	Planning and Regeneration Department GBC
	Publish Supplementary Planning Guidance on Shopfronts and Advertisements	Planning and Regeneration Department GBC
	Ensure that conservation policies are adequately represented in the content and priorities of the LDF	Planning Policy Team GBC
	Ensure the development control team makes the best use of 'materiality' and the other policies in the Management Proposals to address changes in and on the edges of the three conservation areas	Development Control Team GBC
Local List	Agree the draft criteria for a Local List; consult with local amenity organisations and start drawing up a draft list	Planning and Regeneration Department GBC

Action:	Achieved by:	Responsibility:
Education	Encourage relevant officers and councillors to undertake training in the historic environment	Democratic Services GBC
Procedures	Ensure that the conservation officer is consulted on all planning applications in or adjacent to conservation areas, as well as applications for LBC and CAC	Development Control Team GBC
MEDIUM TERM	(within three years)	
Action:	Achieved by:	Responsibility:
Conservation policy	Provide Guidance Notes on a range of other issues such as: The importance of historic details and traditional materials; Protecting front gardens and boundary treatments; The control of trees; Loft conversions/Dormer windows/ Rooflights; Renewable energy.	Planning and Regeneration Department GBC
Grant aid	The Borough Council could consider applying to HLF, DCLG, English Heritage or other body as appropriate for a conservation area grant scheme (subject to the availability of match funding)	Regeneration Section GBC
Highways and the public realm	Prepare a Streetscape Manual and discuss possible enhancements to the public realm	Kent County Council
Buildings at Risk	Prepare a Buildings at Risk Strategy	Regeneration Section, GBC
Site by site enhancements	Prepare a programme of specific site-by-site enhancements based on the recommendations in section 5 (where the Borough Council is able to control future actions)	Planning and Regeneration Department GBC
Trees	Produce a Tree Management Plan	Planning GBC

Appendix 4

LOCAL LIST – DRAFT CRITERIA

1 Purpose of a Local List

Buildings that are listed nationally are protected by law. They tend to be buildings of higher quality and generally date from before 1840. The purpose of a Local List is to identify locally significant buildings and other features which may not be considered eligible for statutory listing.

2 The effect of local listing

The protection of buildings or other features which are Locally Listed can be achieved through policies in the Local Plan, or in Supplementary Planning Document. The identification of these special buildings or features is also best achieved through consultation with local communities, giving them 'ownership' of the Local List and helping to inform and enlighten local knowledge.

Although there is no statutory protection for such buildings, local listing can be a material consideration to be taken into account in determining planning applications.

3 Principles of selection

Locally listed buildings or structures are those which make a special contribution to the history, appearance, character, and cultural value of the Borough of Gravesend. They include the following:

- Buildings which have qualities of age, style, materials and detailing
- Well detailed historic shopfronts
- Historic structures such as walls or railings
- Historic street furniture including paving, post boxes, bollards, or street lighting

- Former industrial sites (where scheduling as an 'Ancient Monument' is not appropriate), which have particular local significance
- Other features which have historical or cultural significance, perhaps by association with a famous person or event.

They should all survive in a clearly recognisable form, with their historic features and layouts still present. Some selection of the better examples of these buildings or structures will be necessary, so in some cases the most authentic and interesting of a group of buildings may be Locally Listed, rather than the whole group. It is likely that most of the entries will date from the mid-19th to the mid-20th century, but recent buildings of outstanding quality could be considered.

4 Categories

In summary, the Local List for the Borough of Gravesend could include the following categories:

(i) Buildings

These may include:

- Buildings designed by a particular architect or designer of regional or local note
- Good examples of well designed domestic buildings which retain their original details and materials
- Good examples of educational, religious or community buildings which retain their original details and materials;
- Landmark buildings or structures of notable design
- Buildings or structures of which contribute to our understanding of the development of the area.

(ii) Structures

These may include:

- Notable walls or railings
- Street lighting
- Bollards
- Street surfaces
- Post boxes.

(iii) Historic Association

These must be well documented and may include:

- Any building or structure which has a close association with famous people or events
- Any building or structure which has a close association with an important local feature including statutorily protected sites or building

Appendix 5

SUGGESTIONS FOR LOCAL LISTING

1 Darnley Road Conservation Area

Suggestions for Local List: None

Key Unlisted Buildings (which could be considered for Local Listing once the criteria have been agreed) are:

- Darnley Road: All buildings except nos. 81 to 85 and The Fireplace (single-storey shop extension to the front of no. 117a);
- Cobham Street: All buildings except the extension to no.7 Wrotham Road;
- Darnley Street: All buildings except nos. 22, 23, 27, 36, 37, 38, 39, 40, 41 48;
- Pelham Road: nos. 2 to 6.

2 Pelham Road/The Avenue Conservation Area

Suggestions for Local List: None

Key Unlisted Buildings (which could be considered for Local Listing once the criteria have been agreed) are:

- Pelham Road: nos. 20-40, 48-64, 70-92, 17-19a, 21, 25, 27, 33-53, 57-59 and The White Post Public House;
- The Avenue: nos. 1-43, 2 -18, 51;
- Lennox Road East: nos. 1-7 and 2 -16;
- Bycliffe Terrace: nos. 1-6;
- Pelham Terrace: nos. 3-16.

3 Windmill Hill Conservation Area

Suggestions for Local List: Unlisted buildings on the west side of Windmill Street.

Key Unlisted Buildings (which could be considered for Local Listing once the criteria

have been agreed) are:

- Nos. 1-18 Primrose Terrace;
- Nos. 1-16 Christ Church Crescent & nos. 2-21 Christ Church Road;
- The Windmill Tavern Public House;
- Nos. 1-27 Clarence Place, nos. 32-35 Clarence Place & nos. 37-38 Clarence Place;
- Nos. 90-95 Windmill Street;
- Nos. 1-5 Hillside Terrace.
- Nos. 5-7 Parrock Road (Bronte Villas)
- Nos. 13-19 Parrock Road
- Nos. 33-35 Parrock Road

Appendix 6 CONTACT DETAILS

For further information regarding all planning and conservation related matters:

The Georgian Group,
6 Fitzroy Square,
London W1T 5DX.
Tel: 087 1750 2936
www.georgiangroup.org.uk

Regeneration Section
Planning and Regeneration Services
Gravesham Borough Council,
Civic centre,
Windmill Street,
Gravesend,
Kent DA12 1AU.

Tel: 01474 337406
www.gravesham.gov.uk

For further information relating to listed buildings and conservation areas:

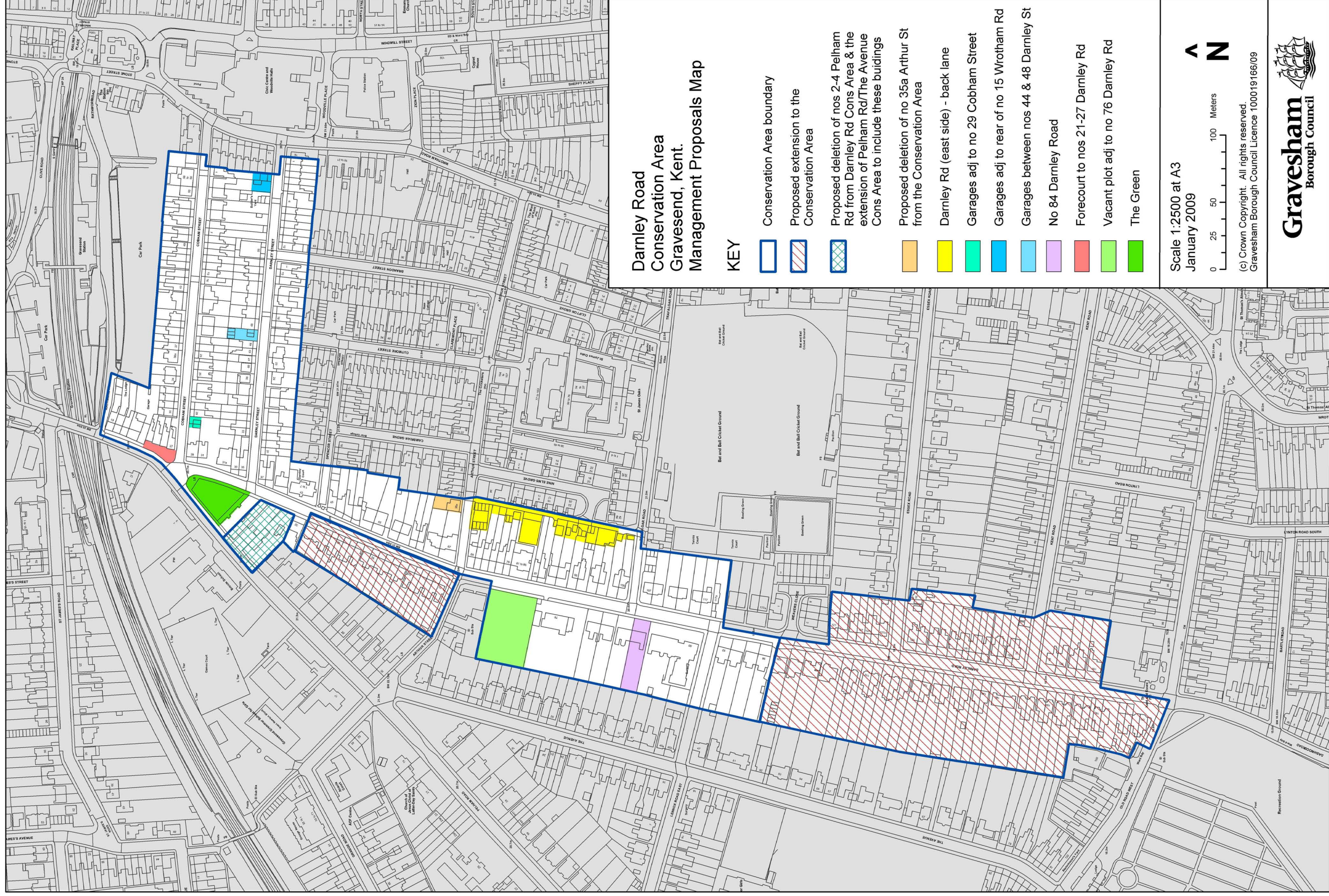
English Heritage South-East Region,
Eastgate Court,
195-205 High Street,
Guildford,
Surrey GU1 3EH.

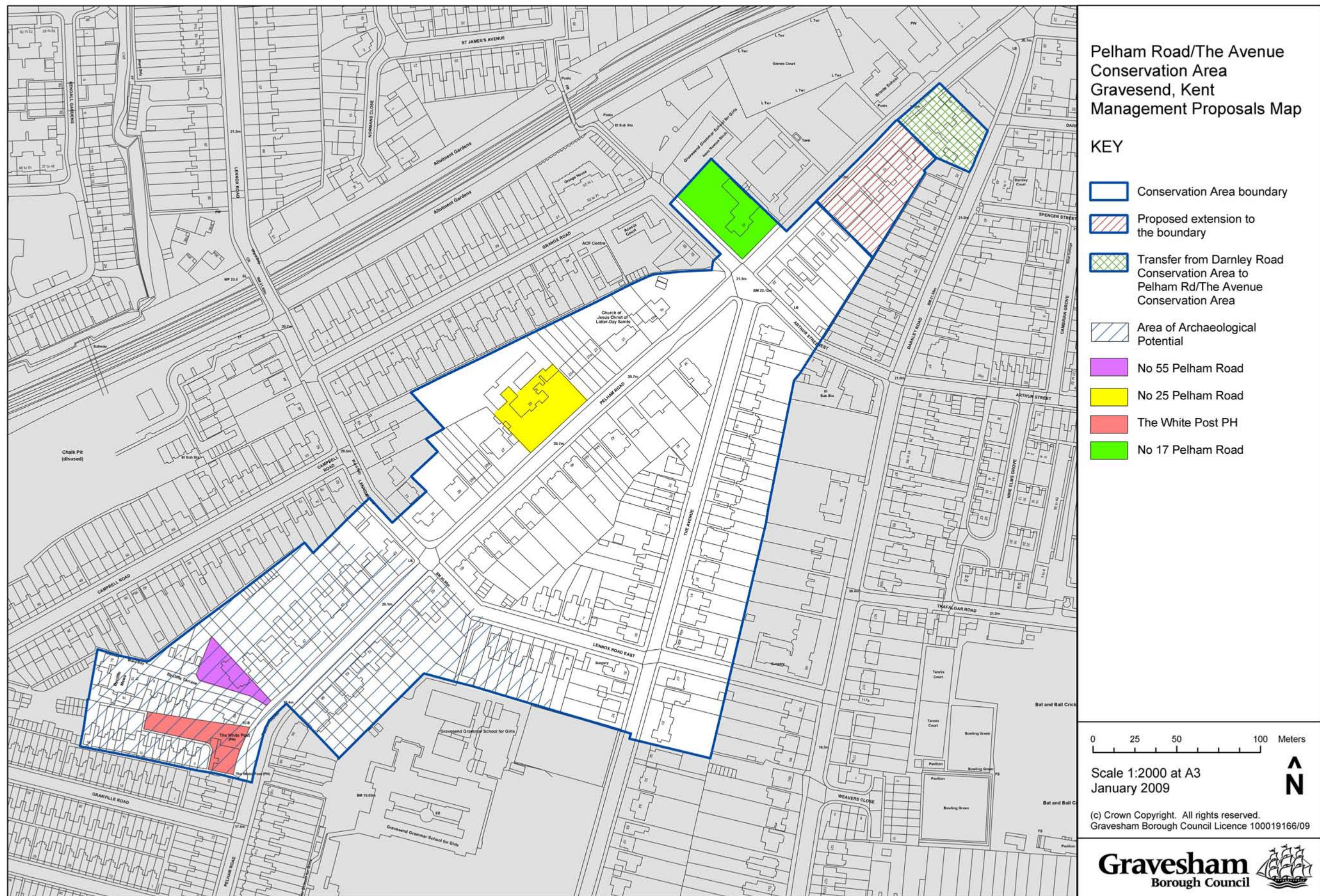
General enquiries: 01483 252000
www.english-heritage.org.uk

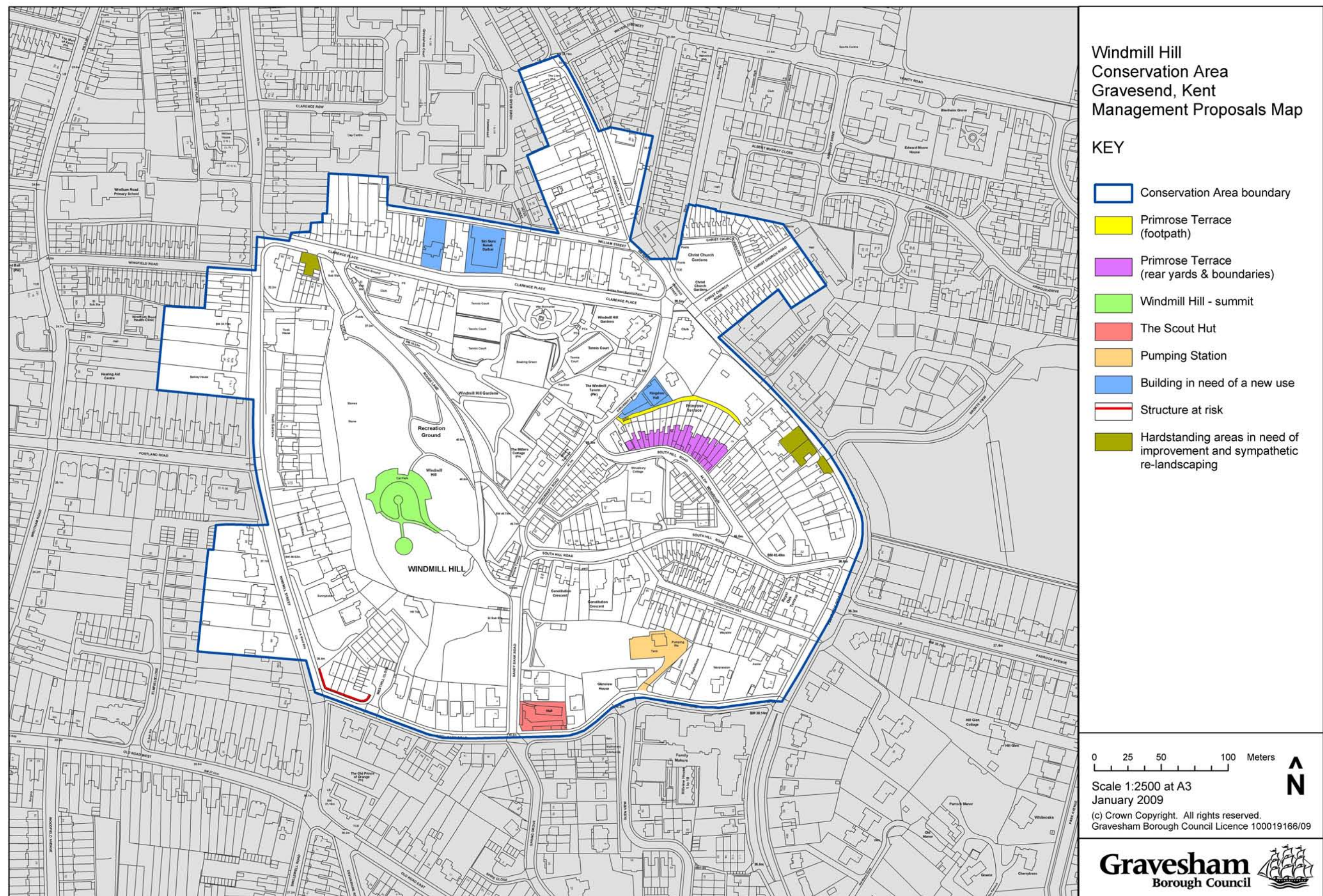
For technical guidance:

The Victorian Society,
1 Priory Gardens,
Bedford Park, London W4 1TT.
Tel: 020 8994 1019
www.victorian-society.org.uk

The Society for the Protection of Ancient Buildings (SPAB),
37 Spital Square,
London E1 6DY.
Tel: 020 7377 1644
www.spab.org.uk







No.	Name	Conservation Area	Comments	Response
1	No name	Queen Street	(i) The appraisal does not accurately describe the area, and there is too much general information included in the 'Issues' section.	Noted - no further action (NFA)
			(ii) The proposed boundary changes are appropriate.	Noted - NFA
			(iii) No. 32 Queen Street is not shown on the maps (?) - does it include some historic timber-framing.	No. 32 is within the Conservation Area and is shown as such on the maps. It has been identified as a 'positive' building that contributes to the special historic and architectural interest of the area.
2	Martine Hodson	Riverside, High Street, Milton Place, Queen Street, Upper Windmill Street, Harmer Street, King Street, Windmill Hill	(i) The draft appraisals accurately describe the conservation areas.	Noted - NFA
			(ii) In line with EH guidance, the boundaries of the conservation area have been drawn too tightly and I would recommend that the centre of Gravesend is considered as a single conservation area.	The Riverside, King Street, Milton Place and Harmer Street have their own distinctive character which is different from, for example, High Street. It is proposed to combine High Street with Queen Street, as these two areas make up the historic core of the town.
			(iii) A key issue is the poor maintenance of the areas to the rear of properties.	Noted. Text to be amended to include this as an 'Issue' where relevant.
3	Mrs Fearn	Riverside	(i) The draft appraisals accurately describe the area.	Noted - NFA
			(ii) Large scale buildings is identified as an 'Issue', but GBC is currently supporting a scheme for a 34 storey tower in the town - this would not make a positive contribution to the area.	The CABE/EH Guidance on tall buildings (2007) acknowledges that in certain circumstances tall buildings can make a positive contribution if of excellent urban design and architecture.
4	Mr J Holmes	Upper Windmill Street	(i) The draft appraisal does not accurately describe the area.	Noted - but the response does not explain why - NFA
			(ii) Does not agree with the proposed boundary changes.	Noted - but the response does not explain why - NFA
			(iii) Cygnet House, the police station and the Civic Centre should be removed from the conservation area as they do not make a positive contribution to the area.	The view between Sheppy Place and Zion Place is an important one within the current conservation area.
5	Frank Fearn	Windmill Hill	(i) The draft appraisal does accurately describe the area.	Noted - NFA
			(ii) The volume of traffic in the area in particular that using Clarence Place as a cut-through route is an issue that is not mentioned in the appraisal.	Parking is included as an Issue, but not the volume of traffic. Clarence Place is a cut-through route and text will be amended to recognise this in the 'Traffic and parking' paragraph.
			(iii) Another issue that is not mentioned in the appraisal is the lack of refuse storage areas where buildings are being converted to flats.	Subdivision of buildings is particularly noticeable on Parrock Road and bin storage is an issue. Text to be amended to recognise this.

No	Name	Conservation Area	Comments	Response
6	Claire Bradbrook	Windmill Hill	(i) The draft appraisal accurately describes the area.	Noted - NFA
			(ii) Agrees with the proposed boundary changes.	Noted - NFA
7	Thames Defence Heritage	Riverside	(i) This is a helpful document and we are pleased that the New Tavern Fort is recognised as being of great national historic importance.	Noted - NFA
			(ii) Section 3.3 - para 2, delete 'sheer' and replace with 'steep'	Text to be amended accordingly.
			(iii) Section 4.1 - the Roman town of Vagniacae was discovered through the excavations of the Gravesend Historical Society - The Channel Tunnel Rail link works have added significant further information.	Noted.
			(iv) Section 5.1 There are no bastions at New Tavern Fort but there are ramparts.	Noted, text to be amended accordingly.
			(v) Section 5.2 'ramparts' would be a better word than 'bastions'	Noted, text to be amended accordingly.
			(vi) Section 5.5 Support the statement that trees obscure key views.	Noted - NFA
			(vii) Section 7.3 The obelisk was originally sited at the NW corner of the Canal Basin.	Noted.
			(viii) Section 7.5 - the labeling of 'boat house' has been taken from the plaque on the building, but there is no evidence of this building having been used as a boat house.	Noted, text to be amended to clarify.
			(ix) Section 7.7 - can 'paraphernalia be replaced with an alternative word, such as 'features'. And the last bullet-point, is the function of the bollards accurately described, or are they decorative.	Text to be amended to clarify.
			(x) Section 8.3 'Bastions' needs to be replaced with 'ramparts'. Could the 4th bullet-point under principal features be replaced with 'parapets with openings for guns'. Agree with the first bullet point of 'negative issues.	Noted, text to be changed accordingly.
			(xi) Section 9.2 - agree with the suggested extension to the conservation area.	Noted - NFA
			(xii) Section 9.3 - the state of the information boards at New Tavern Fort is the result of vandals, the image boards underneath is perfect. The polycarbonate sheets need to be replaced.	Noted, amend text accordingly.
			(xiii) Section 9.9. First bullet point, as at section xii.	Noted, amend text accordingly.
			(xiv) Appendix 2 - page 28 - the remains of the Gravesend Blockhouse are on (or just outside) the western perimeter of the conservation area.	Noted.

No	Name	Conservation Area	Comments	Response
8	Martin Mackay, Vice Chair, Urban Gravesham	All the Gravesend Conservation Area Appraisals	(xv) Appendix 2 - page 28 - there were no connecting stone walls, only earthen ramparts.	Noted, amend text accordingly.
			(xvi) Suggested additions to the text. To add that the outline of the excavated remains of the Milton Blockhouse have been surface-marked at the NW corner of the Canal Basin and the adjacent Canal Road.	Noted - confirm with GBC
			To add that the Chantry Heritage Centre contains displays relating to the history of the building and to the riverside which is the focus of the Conservation Area itself. Likewise, the magazines of the forts contain displays.	Noted. Text to be amended to mention this.
			(i) The thoroughness and length of the documents often mean that the key messages are hidden in the body of the text, and therefore it is recommended that: (a) the text is shortened by the use of more captioned pictures; (b) short summaries are provided of the analysis to show what is important about each area; (c) it should be made clearer how the analysis will directly connect to management guidelines.	a) DTP and captioned pictures will make text more easily readable b) positive and negative features are bullet pointed after analysis of each character area, c) Issues are summarised at the end of the document.
			(ii) Welcome the inclusion of part of St Andrew's Gardens as positive green space	Noted - NFA
			(iii) The following views should be noted in the appraisal: (a) From Queen Street over St Andrews Gardens to the spire of St Andrews Arts Centre and the river beyond; (b) To St George's Church from Bank Street and from the bottom of Bath Street. These views are toward buildings of cultural and historic significance.	a) The appraisal has identified the view 'North across St. Andrew's Gardens and the River Thames to Tilbury' as a principal positive one, b) To St George's Church from Bank Street and The Terrace (text to be amended to clarify) c) The view from the bottom of Bath Street is not considered to be a principal one.
			(iv) Would like to see important views photographed and captioned in the text.	Noted
			(v) The protection of significant views should be a major consideration in the Management Plans.	Noted
9	Planning & Regeneration Department, Gravesham Borough Council	Gravesend Riverside	TAM should show positive views 1) over Ordnance Road open space towards Riverside Leisure Area, 2) from river Thames/Essex shore toward The Promenade/ New Tavern Fort, 3) of Royal Terrace Pier from the river	Noted. TAM to be amended accordingly.
			9.2: Ordnance Road open space (site of former swimming pool) and Milton Place car park and depot site form part of historic curtilage of New Tavern Fort and should be included in the CA.	Noted. Text, TAM and Management Proposals map to be amended accordingly.
		High Street	Statement of Special Interest should address area west of Customs House	Noted. Text to be amended accordingly
			Importance of the River Thames to the development of the town needs to be stressed.	Text to be amended.

No	Name	Conservation Area	Comments	Response
			Importance of views from River Thames and Essex shore toward the town centre need to be highlighted	Text to be amended.
			3.5 Relationship of the CA to its surrounding - Should include under bullet points 'To the north: The River Thames, Tilbury Fort and the Essex shore'	Text to be amended.
		Hospital & Commercial Quarter	The conclusion that the area is to be de-designated gets lost within the text and should made clearer in both the appraisal document and the subsequent management plan.	Text to be amended.
		King Street	Cinema façade is a key unlisted structure within the Conservation Area. Buildings adjoining the New Inn are part of the original early 18th century range and should be highlighted as key unlisted buildings.	Text to be amended accordingly.
10	Roger Gow	Queen Street	Townscape Area Appraisal Map: Nos. 19 & 21 are two late 18th century houses and positive buildings in the CA despite present poor condition	Text and TAM are to be amended accordingly.
			9.6 New development: Desirability of re-instatement of pedestrian linkages should be added including properties such as the rear of the former cinema at King Street (Brewhouse Yard), the southern end of High Street, and spaces lying between Market Hall and Brewhouse Yard.	Noted. Text to be amended accordingly.
			Draws attention to nos. 19 & 21 Queen Street; these buildings are of historic interest and should be marked as positive buildings on the Townscape Appraisal Map.	Agree, this has been an oversight and will be amended accordingly. Nos. 19 & 21 are on the Council's list of Local Interest Buildings.
11	Andrew Walkden (late comment received in December 2008)	Harmer Street	Object against the proposal to include the properties nos. 47-50 as they not really sit with the character of the Harmer Street Conservation Area and are not sufficiently special in themselves that would merit their inclusion.	Agree. Properties not to be included in the Conservation Area. Management Plan and proposals map to be amended accordingly.

PUBLIC CONSULTATIONS REPORT - CONSERVATION AREA CHARACTER APPRAISALS for the following Conservation Areas:

Pelham Road/The Avenue and Darnley Road (Gravesend), The Hill, Lansdowne Square, and Overcliffe (Northfleet)

PUBLIC CONSULTATION REPORT - MANAGEMENT PROPOSALS for the following Conservation Areas: **Darnley Road, Gravesend Riverside, Harmer Street, High Street, Hospital & Commercial Quarter, King Street, Milton Place, Pelham Road/The Avenue, Queen Street, Upper Windmill Street and Windmill Hill (Gravesend), The Hill, Lansdowne Square, and Overcliffe (Northfleet)**

August 2008

No	Name	Conservation Area	Comments	Response
1	Mark Pressley	Pelham Road/The Avenue CAA	(i) Agrees with location, landscape setting and historical development.	Noted - NFA
			(ii) Agrees with key positives/negatives	Noted - NFA
			(iii) Wants to see the flint wall reinstated in Bycliffe Terrace	Enforcement Action has been taken by the authority to see the wall appropriately rebuilt
2	Andy Clement-Bishop	Gravesend Riverside/ Milton Place CA MPs	(i) Concerned that proposals to extend the CA do not impede their proposals for the Ordnance Road/Milton Place Triangle - all to do with the Virginia Square Project	Noted - NFA
3	Simon Fincham	Harmer Street CA MPs	(i) Agrees with Generic Actions, Policies, and Site Specific actions	Noted - NFA
			(ii) Suggests reducing the width of Harmer Street to one lane , with wider pavements and trees;	This would need to be considered within the context of town centre traffic management as a whole. Reducing the width without diverting the traffic away from Harmer Street would only result in more stationary traffic in the street.
			(iii) Council should take enforcement action against those owners who allow their properties to degenerate	The Council has been taking action where resources permit.
4	John Barnes (representing CADCAS)	Darnley Road CA MPs	(i) Does not agree with Site Specific Recommendations - refer to CADCAS document	See below
			(ii) No Management Proposals for CA on website, just Site Specific Recommendations	Generic actions and policies are included in the main Management proposals so each CA has site Specific Recommendations - NFA
5	CADCAS (Cobham and Darnley Streets' Community Association)	Darnley Road CA MPs	(i) CA boundary review - agreees with addition of nos. 2-6 Pelham Road	Noted - NFA
			(ii) Suggests No. 35a Arthur Street is removed from CA	Agree. This has been suggested within the management proposals for this area.
			(iiia) Don't agree with recommendation that nos. 34-72 Darnley Road are included in CA - would dilute the special character of the existing CA too much	Disagree. The terrace has townscape value in views up the street.
			(iiib) instead suggests amalgamating Darney Road CA with Pelham Road/The Avenue CA.	Noted. The combination of the two areas, including the drawing up of a combined appraisal and management plan, will be undertaken within the next review of the Conservation Area
			(iv) Agrees with criticism about the loss of original features but wonders how the Council will stop this?	An Article 4 Direction is in place that has put previously permitted development and incremental changes under planning control

No	Name	Conservation Area	Comments	Response
			(v) Rear of nos. 69-105 - agrees that the back lane needs improvement but does not consider this to be priority	Noted - NFA
			(vi) Garages between nos. 27-31 Darnley Street - given that the site is being redeveloped thinks the Council should have ensured that the area is improved as part of the PP - notes that parking is a perennial problem and that the new development will merely add to this	Noted - NFA
			(vii) Area around Cobham Street, DarnleyRoad/Pelham Road junction - needs architect's drawings to suggest ways of making improvements - could act as attractive gateway into Town Centre	Noted - NFA
			(viii) Noted vacant property to the north of no. 76 Darnley Road	A scheme for residential development has been permitted on appeal. NFA
			(ix) Shopfronts - Council guidance is helpful but grants would help achieve more	Noted - NFA
			(x) Amenity space - suggests planting pseudocacia mixed with conifers and provding 'doggie' bins	Noted - NFA
			(xi) Traffic sings, street lights and the public realm - agrees with general comments - would like to see extension of traditional street lights (from Town Centre); new street surfacing and the reinstatement of paving slabs in both Cobham and Darnley Streets; and chicanes to slow down traffic (but include revised parking arrangements)	Agree. Reference to this has been made under Paragraph 5 of the management proposals for the Darnley Road Conservation Area.
			(xii) Statutory and Local List - agrees with principles but thinks that grant aid would help owners of 'historic buildings' to maintain their properties	Noted
			(xiii) Traffic and pedestrians - notes the success of improvements made 4 years ago - suggests better access be provided to the underground car park at Woodville Halls and some subsidised use of the Rathmore Road Car Park	Noted - NFA
			(xiv) Improve pedestrian movement through CA by maintaining existing alley ways and perhaps adding new ones eg between Cobham Street and the Station Complex	Noted. The historical layout of Cobham Street makes it impossible to create a direct pedestrian link to the station complex without the need for Compulsory Purchase.
6	Mr and Mrs C Barnes	Darnley Road CA MPs	(xv) Hanging basket scheme has been a success and has been aided by CADCAS. Tree planting scheme needs to be resurrected	Noted - Tree planting already mentioned in MPs - NFA
			(i) Agrees with Site Specific Recommendations (ii) Notes that developers often get what they want on appeal. Also that private house owners are often stopped from undertaking minor changes when developers get permission for major schemes which are detrimental. Considers that there are already far too many flats.	Noted - NFA Noted - NFA