

APPENDIX I: TABLE OF REPRESENTATIONS, THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE ASSESSMENT DOCUMENT IN RELATION TO THEM – FOR GRAVENEY CHURCH, BRIDGE AND GOODNESTONE C.A.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
1	Graveney with Goodnestone Parish Council	Graveney with Goodnestone Parish Council welcome the publication of the comprehensive review of the three Conservation Areas which are included within our Parish. We are now submitting our comments on the proposals put forward in the consultation document. GOODNESTONE CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the orchards behind the properties extending from Poplar Hall to Goodnestone Lane to help preserve and enhance the setting of these properties and the wider Conservation Area. The reference to the eligibility of a specified range of properties for inclusion within the Swale Local Heritage List also recognises the importance of these heritage assets and would help enhance the historic significance, character and setting of the Conservation Area. GRAVENEY BRIDGE CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the parking area alongside the Four Horseshoes Inn which would assist in preserving and enhancing the setting of the Conservation Area. The reference to the eligibility of specified properties for inclusion within the Swale Local Heritage List also recognises the importance of these heritage assets and would help enhance the historic significance, character and setting of the Conservation Area. GRAVENEY CHURCH CONSERVATION AREA The Parish Council supports the proposed boundary adjustment to include the parking area for the Church and part of the reinstated footpath alongside the churchyard as these areas would help preserve and enhance the historic setting of the Church and wider Conservation Area. The reference to the eligibility of Graveney Court Cottage for inclusion within the Swale Local Heritage List also recognises the importance of this heritage asset	Noted & welcomed	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		and its proximity to the Church and would help enhance the historic significance, character and setting of the Conservation Area. The Parish Council fully endorses the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the Village Hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However , we feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street , to include the full length of Odin's Path , the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of The Old Vicarage, with its origins dating back to the 16th Century. We would submit that both Sparrow Court and The Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street. We would also submit that this Conservation Area could be further extended to include the section of farmland , pasture and playing fields linking the Church car park to Bridge House and running alongside the western boundary of Seasalter Road, primarily to preserve and enhance the setting and visual amenity of the surrounding heritage assets and to recognise the contribution which this historic landscape makes to the Graveney Church and Graveney Bridge Conservation Areas.	While these assets possess historic associations and benefit from the open farmland that contributes to their setting, the wider area does not demonstrate a level of special architectural or historic interest sufficient to justify designation. Sparrow Court already benefits from statutory protection through its listed status, and national guidance advises against extending Conservation Areas solely to capture isolated heritage assets or extensive areas of open countryside.	

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
2	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document
3	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.		
4	Local Resident	I have reviewed the extensive Conservation Area Review and commend you on the detail and work which has gone into this. I have no views on the Graveney side of the document and agree with the proposed changes to the conservation areas, and improvements which could potentially be made. However, I am a little puzzled by the extension to the Goodnestone conservation area, the proposed extension of its boundary affect my families land, and solely my families land, and basically now follows the boundary of our smallholding. In principle we have no problem with this, however one of the key arguments in the conservation area extension is because the land is planted with orchard. This isn't entirely true, only about 50% of this land is plum, apple and pear orchard, the remainder is planted with Kentish Cobnut trees, and the remainder with a willow tree plantation. There is no guarantee as the landowner and farmer that the orchard use will remain, especially as a high percentage of the fruit trees need grubbing up due to their age and decreased production.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Is the conservation area saying that we have to keep orchards to preserve the heritage of the village. The stretch of land in question has been a mixture of orchard, pasture or agricultural land for over 100 years, and has changed many times over the years (we can provide photographic evidence of this), I don't see how the council can insist on the preservation of an orchard when we might want to plant and farm other crops, but then this completely goes against the arguments of the conservation area extension proposal. We would like to clarification on this point, and any restrictions on land use which may be imposed. Also, the extension of the conservation area now includes a 1970s Atcost concrete and asbestos barn, does this now mean that this building has to be preserved? We have been guardians of this stretch of land for over 60 years, we have never seeked to develop the land for anything other than farming, but feel that to include solely our land, and 100% (as the proposed conservation area boundary is our boundary) of it could be both unfair and restrictive to future commercial agricultural activities.		
5	Local Resident	I have reviewed the documentation for the 3 conservation areas in Graveney and Goodnestone and would like the following additions to be considered please for the Graveney Church CA. Include all land that faces the three heritage assets of Murton Barn, Murton's Farmhouse and Graveney Court Cottage. This is to protect the views and setting afforded to these properties. Include all land that faces Graveney Church to protect its setting. Include all land to the rear of the three heritage assets of Murton Barn, Murton's Farmhouse and Graveney Court Cottage to protect the views and setting afforded to these properties.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Include The Old Vicarage and Sparrows Court in the CA, to recognise and protect their heritage and setting.		
6	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street	Noted and welcomed.	No Change to the appraisal document
7	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.		
8	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage , with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
9	Local Resident	I would like to submit my support for your plans to expand the 3 conservation areas in the East of the Borough. Swale has seen so much disruption from housing expansion and highways improvements in recent years, often with the appearance that the importance of our natural spaces have been overlooked. May I suggest a Facebook poll or something similar to gauge people's opinions on the matter rather than relying on emails as I feel many will not take the time to write to you.	Noted and welcomed	No Change to the appraisal document
10	Local Resident	I support the proposal to include within the Conservation Area a section of Odin's Path and the footpath leading towards the village hall in view of their undoubted historical significance and as a justifiable exception to the general guidelines set out in Advice Note 1 from Historic England. However, I feel that there is an opportunity to extend the boundaries of the Conservation Area still further to recognise the very important setting and historic background of the wider landscape area extending from the Conservation Area towards Broom Street, to include the full length of Odin's Path, the 15th Century Grade II listed building of Sparrow Court and the non-designated heritage asset of the Old Vicarage, with its origins dating back to the 16th century. I would submit that both Sparrow Court and the Old Vicarage have a combined archaeological and historic interest from their association with Graveney Court and the Church over many centuries. The wider historic association between all these properties is an important consideration and the significance of their setting is exemplified and enhanced by the open farmland between the Conservation Area and Broom Street.	Noted and welcomed.	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
11	Local Resident	I agree the conservation areas should be extended and would go further to say that they should encompass the fields behind Graveney Church that lead to Broom Street and run alongside Sandbanks Lane. This would then help protect Sparrow Court https://historicengland.org.uk/listing/the-list/list-entry/1069143 a grade listed hall house and also The Vicarage, https://themovemarket.com/tools/propertyprices/the-old-vicarage-broom-street-graveney-faversham-me13-9ds (which should be considered for listing). These two properties are clearly visible from Graveney Church and visa versa and therefore, this ancient setting, which has existed since medieval times with Sparrow Court, should be preserved and protected.	Noted and welcomed.	No Change to the appraisal document
12	Iceni Projects – Planning Consultants	On behalf of Skylark Kent LLP, the 14-page response is attached as appendix III. Public Consultation response from Iceni Projects on behalf of Skylark Kent LLP in reference to Land at Sandbanks Lane and Seasalter Road, Graveney, ME13 9DU (Swale Reference: 23/504264/OUT) (PINS Reference: APP/V2255/W/25/3365131), (the appeal decision has been made and the application granted) Land West of Head Hill Road, Graveney, ME13 9DE (Swale Reference: 23/504263/OUT) (PINS Reference: APP/V2255/W/25/3367559) (dismissed impact on heritage assets)	Noted	No Change to the appraisal document

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

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Officer Response to Iceni Projects' Consultation Submission (on behalf of Skylark Kent LLP)

1. Statutory and Policy Context

The Iceni submission applies an unduly restrictive interpretation of the *Planning (Listed Buildings and Conservation Areas) Act 1990*. The statutory test for designation remains whether an area is of *special architectural or historic interest*, assessed in its entirety. The Act does not require that all land within a conservation area exhibit high architectural quality, nor does it preclude the inclusion of neutral or modern features where these form part of the area's historic structure, spatial character, or setting.

Historic England's *Advice Note 1* explicitly recognises the role of landscape, open space, historic routeways, and spatial relationships in contributing to special interest. The draft appraisals follow this guidance appropriately.

2. Relationship with Ongoing Planning Appeals

The suggestion that the Council should defer conservation area review pending the outcome of unrelated planning appeals is not supported by statute or case law. Conservation area designation is a strategic heritage function, independent of individual development proposals. Appeal decisions may inform future development management but do not constrain the Council's duty to identify and protect areas of special interest. The Council is therefore acting entirely within its powers in progressing the appraisals at this stage.

3. Accuracy and Methodology of the Appraisals

The Iceni critique selectively challenges descriptive elements while overlooking the structured methodology underpinning the appraisals. The documents:

- distinguish clearly between internal character, immediate setting, and wider landscape context
- draw on site survey, historic mapping, and established conservation practice
- identify views that contribute to significance, including glimpsed or filtered views, which are recognised in national guidance
- reflect the historic interdependence of settlement form, marshland, agricultural land, and routeways in both Graveney and Goodnestone

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

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The claim that the appraisals “conflate” settlement and conservation area characteristics is not supported by the evidence. The documents appropriately describe how the conservation areas sit within, and derive significance from, their wider historic context.

4. Proposed Boundary Extensions

The Iceni submission mischaracterises the purpose and justification of the proposed boundary extensions.

Graveney Church

The extension includes land that contributes to the legibility of the historic settlement pattern, the setting of the church, and key views. The presence of a modern car park does not preclude inclusion; conservation areas routinely encompass neutral or detracting elements where these form part of the historic spatial structure or contribute to understanding significance. Odin’s Path is a historic route whose surviving alignment is relevant to the area’s evolution.

Graveney Bridge

The extension captures the historic crossing point, associated land parcels, and the spatial relationship between bridge, watercourse, and settlement. Modern features do not negate the area’s historic interest. Archaeological potential is a legitimate consideration and is not dismissed by the Council.

The assertion that the extensions are “legally vulnerable” is speculative and unsupported by any substantive analysis of the statutory test.

5. Goodnestone Conservation Area Boundary

The Iceni critique assumes that conservation area boundaries must follow parish boundaries or modern settlement edges. This is incorrect. The existing and proposed boundaries reflect the historic agricultural setting that shaped the village’s development and contribute to its special interest. The northern land parcels help explain the evolution, form, and rural character of the settlement. The boundary is therefore coherent and justified.

PROPOSED FAVERSHAM-PRESTON NEXT C.A. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

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6. Development Management Considerations

The appraisals do not seek to restrict development. They emphasise the need for context-sensitive design, consistent with the National Planning Policy Framework. Identifying sensitive views, spaces, or settings is a normal and necessary part of conservation area management. The suggestion that the documents act as a “barrier to progress” is rhetorical rather than evidence-based.

7. Overall Position

The Iceni/Skylark submission presents a narrow and selective interpretation of heritage policy and overstates the legal risks associated with the Council’s approach. The draft appraisals:

- are proportionate, evidence-based, and aligned with national guidance
- provide a robust assessment of character, setting, and significance
- offer clear and defensible justification for the proposed boundary extensions
- support effective long-term management of the historic environment

There is no basis for concluding that the appraisals require fundamental revision or that the proposed extensions are unsound.