

Policy and Resources Committee Meeting	
Meeting Date	11 th March 2026
Report Title	Graveney & Goodneston Conservation Areas review
EMT Lead	Emma Wiggins - Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Jhilmil Kishore - Principal Heritage Officer
Classification	Open
Recommendations	1. To note the Character Appraisal and Management Strategy document (public consultation draft, as set out in Appendix II) for the review of Graveney Church, Graveney Bridge and Goodnestone Conservation Areas, and representations made by interested parties, as set out in Appendix I. 2. To note the officer's response to the representations received during the course of the public consultation, as set out in Appendix I 3. Adopt the Character Appraisal and Management Strategy subject to any minor editorial amendments and formatting.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to make the Policy & Resources Committee aware of updated appraisals to three conservation areas – Graveney Church, Graveney Bridge and Goodnestone. and to recommend that all three conservation areas be formally re-designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act, 1990. The proposals include a detailed character appraisal and associated management strategy in line with current good practice for the management of conservation areas. Officers recommend that the Policy & Resources Committee supports and agrees the changes to the review document set out in Appendix I and as reflected in Appendix II).

2 Background

- 2.1 Goodnestone Conservation Area, the oldest of the three, was first designated in March 1976, while Graveney Church and Graveney Bridge Conservation Areas were designated in November 1999. A brief character appraisal was compiled for all three Conservation Areas in 1999. There is a formal requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 for Conservation Areas to be reviewed from 'time to time'.
- 2.2 The Swale Heritage Strategy, adopted in March 2020, has resulted in a stronger commitment by the Council to ensure its conservation areas are reviewed more regularly and possible new conservation areas also given consideration. The review of the three Conservation Areas in Graveney & Goodnestone is part of the work programme of the second 3-year action plan forming part of the adopted Swale Heritage Strategy 2020 – 2032. As the existing level of officer resource did not allow for this review work to be carried out in-house, an external consultant (Conception Architects) was appointed to undertake the review.

- 2.3 The proposal is to re-designate and amend the boundaries of the three conservation areas and to equip them with a detailed character appraisal and a complementary management strategy which will assist with development management and heritage conservation purposes over the next decade or more. It is a matter for the Policy and Resources Committee to decide whether to formally adopt the Graveney Bridge, Graveney Church and Goodnestone Conservation Areas Character Appraisal and Management Strategy (as recommended and set out in Appendix II, following consultation feedback, or otherwise).
- 2.4 Part of the review process involved an assessment of whether the area should be extended or reduced in size. In this regard particular consideration was given to extending the conservation area. The changes proposed to the boundary are as follows:

Proposed boundary changes - Graveney Church The proposal is to extend the Conservation Area to cover the church parking area and part of the reinstated footpath so that the historic route and its setting can be properly protected. Bringing these spaces within the boundary would help ensure that future changes respect their historic character and contribution to local identity. The parking area entrance is also a recognised historic point in Graveney and Goodnestone, marked by a 2001 information board, strengthening the case for inclusion.

Proposed boundary change - Graveney Bridge The Conservation Area extension is proposed to include the parking area beside the Four Horseshoes Inn because it contributes to the historic character and streetscape. Historic maps show the plot was once part of an orchard, and although the orchard has gone, its openness, traditional boundaries, and informal surface still reflect its rural origins.

Proposed boundary change - Goodnestone It is proposed to extend the Conservation Area to encompass the orchards behind properties from Poplar Hall north to Goodnestone Lane. As the only remaining orchards locally, with mature trees and hedgerows defining the edge of the settlement, they reflect historic land use evident on the 1865 Ordnance Survey Map. Their contribution to the rural setting, especially as experienced from the footpath linking the church to Goodnestone Lane, supports their inclusion to better represent the area's historic significance.

- 2.5 Consideration was given, informed by public consultation responses, to extending the Conservation Area boundary to include part of Odin's Path and the footpath leading to the village hall. This reflected their recognised historic interest and the view that they might reasonably be treated as an exception to the general approach set out in Historic England's *Advice Note 1*. (*Historic England Advice Note 1 advises that conservation area designation is not generally intended as a means of protecting the wider landscape.*) A further potential extension was assessed to incorporate the wider landscape between the existing Conservation Area and Broom Street, including the full length of Odin's Path, the Grade II listed 15th-century Sparrow Court, and the non-designated heritage asset of the Old Vicarage, which has 16th-century origins.
- 2.6 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.
- 2.7 Specific concerns were raised by Icen Projects on behalf of Skylark Kent LLP and are presented in Appendix III. These are considered to apply an unduly narrow interpretation of

conservation area legislation and overlook the evidence-based methodology used in preparing the draft appraisals. The Council's assessments of character, setting, and significance are consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic England guidance, and the proposed boundary extensions are proportionate, coherent, and defensible. The presence of modern features does not preclude inclusion where land contributes to the historic form, spatial structure, or setting of the area. The suggestion that ongoing planning appeals constrain the Council's statutory duties is unfounded, as outlined in the officer's response in Appendix I. The Conservation Area and Management Strategy Review document for Graveney & Goodnestone Conservation Areas are considered to remain robust, justified, and appropriate for progression to the next stage of the designation process.

3 Proposals

3.1 The recommendations are:

1. To note the Character Appraisal and Management Strategy document (public consultation draft, as set out in Appendix II) for the review of Graveney Church, Graveney Bridge and Goodnestone Conservation Areas, and representations made by interested parties, as set out in Appendix I.
2. To note the officer's response to the representations received during the course of the public consultation, as set out in Appendix I.
3. Adopt the Character Appraisal and Management Strategy subject to any minor editorial amendments and formatting.

4 Alternative Options Considered and Rejected

- 4.1 One option would be to not take this review work any further or suspend the work on this review until some point in the future. Whilst this option would not result in wasted officer time and loss of cost to the consultant, it could still lead to (a) the designation being challenged, (b) reputational damage to the Council and/or (c) development and associated infrastructure provision decisions being made for the locality without an appropriate understanding and appreciation of the special qualities of the three Conservation Areas in Graveney & Goodnestone. This is not recommended because it would risk the justifiable continuation of the designation and/or the appropriately sensitive and positive management of the Conservation Areas and their wider setting moving forward.
- 4.2 A second option would be to disregard some elements, or all of the feedback received, in terms of the proposed designation. However, whilst it is considered that the appraisal and management plan (to support the re-designation of the Conservation Area) is essentially sound, the feedback provided from the local community is valuable and to ignore any of this feedback without sound reasons would call the value of the consultation process into question and potentially deliver reputational damage to the Council.

5 Consultation Undertaken or Proposed

- 5.1 A 6-week public consultation exercise ran from Monday 1st September 2025 upto and including Friday 10th October 2025.

- 5.2 All those parties with property within or overlapping the current conservation area boundary were notified in writing of the review and were invited to comment on it, as were key relevant organisations including Kent County Council and Historic England.
- 5.3 Hard copies of the review document were made available at Faversham Library and were also available to view/download on-line via the Council's website for the duration of the public consultation period.
- 5.4 A total of 12 consultation responses have been received. 1 from Graveney & Goodnestone Parish Council, 1 from Icen Projects on behalf of Skylark Kent LLP, and 10 from the local residents. The officer response to this consultation feedback (as summarised) is attached as Appendix I.
- 5.5 Historic England and Kent County Council in its function as the Highway Authority were consulted on the Conservation Area designation but provided no feedback in this respect. No response was received either from the county's Ecology Team (which was also consulted). Highways and Ecology at Kent County Council are consulted because Conservation Area designation affects land use, access, and environmental protection. Their specialist data and statutory responsibilities ensure the designation is evidence-based, legally sound, and aligned with wider county strategies.

6 Implications

Issue	Implications
Corporate Plan	The proposed designation of Graveney Bridge, Graveney Church and Goodnestone Conservation Areas would support the Economy priority from the Corporate Plan: <i>'To develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets'</i> .
Financial, Resource and Property	Implementing some aspects of the proposed Management Plan may have financial and resource implications for the council, particularly if it is decided to proceed with an Article 4 Direction review. These financial impacts will be considered if / when these further reports are brought forward. Note: <i>Article 4 review is being considered within Action Plan 3 (2026-2028) of Heritage Strategy.</i>
Legal, Statutory and Procurement	The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on every local planning authority to <i>"determine which parts of their area are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance"</i> and, from time to time, to review the functioning existing conservation areas.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	One of the three dimensions of sustainable development is its environmental role: contributing to protecting and enhancing our natural, built and historic environment.

Health and Wellbeing	The health and wellbeing aspects of interaction with heritage assets and heritage related projects are referenced in the adopted Heritage Strategy which underpins this review work.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.
Local Government Reorganisation	No Impact on Local Government reorganisation, because Conservation Area re-designation comes under management of the area's heritage and is guided by best practices as set out by Historic England and the NPPF.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Public consultation – table of representations (in summary form), and the council's response to them.
- Appendix II: Public consultation version of the 2025 draft Graveney & Goodneston character appraisal and management plan document.
- Appendix III: Public Consultation response from Icen Projects on behalf of Skylark Kent LLP.

8 Background Papers

A Heritage Strategy for Swale 2020-2032 Adopted March 2020