

APPENDIX III – Reasons for Extending the ASCA to Cover the Entire Conservation Areas

A. Queenborough Conservation Area

1. The Conservation Area has a unified historic character

Queenborough is a coherent, legible historic settlement, with its medieval street pattern, quayside setting, and distinctive townscape forming a single, interrelated heritage environment. Applying ASCA controls only to selected streets risks creating inconsistent protection across an area whose significance derives from its overall character, not isolated pockets.

- Extending the ASCA ensures consistent treatment of all historic frontages.
- It avoids a “patchwork” approach that could undermine the Conservation Area’s integrity.
- It aligns with the principle of preserving or enhancing the whole designated area, not just its most sensitive parts.

2. Advertisement pressure is not confined to the proposed boundary

While the highest concentration of signage may be in the commercial core, advertisement creep can occur anywhere within a Conservation Area. Without full coverage:

- Businesses may relocate intrusive signage to unprotected streets.
- Visual clutter may migrate to quieter areas, harming residential amenity.
- Enforcement becomes more difficult and less defensible.

A full-area ASCA provides clarity, consistency, and enforceability.

3. The Conservation Area includes multiple character zones that all contribute to significance

Queenborough’s significance is derived from a combination of:

- its medieval street layout
- maritime and industrial heritage
- historic residential terraces
- landmark civic and ecclesiastical buildings
- the relationship between the High Street, waterfront, and side streets

Each of these contributes to the overall sense of place. Restricting ASCA controls to only part of the area risks undervaluing secondary streets that are essential to the town’s historic identity.

4. Full coverage strengthens enforcement and reduces ambiguity

A partial ASCA boundary creates grey areas where officers must justify why some streets are controlled and others are not. This can lead to:

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- inconsistent decision-making
- increased appeals
- reduced ability to tackle harmful signage

A full-area ASCA provides a clear, unambiguous framework, making enforcement more efficient and defensible.

5. Queenborough Town Council and local Members support full coverage

Local democratic support is a material consideration. Queenborough Town Council and ward Members have expressed a clear preference for:

- full Conservation Area coverage, and
- ensuring that existing lawful signage is unaffected

This demonstrates strong community and Member alignment with a full-area approach.

6. Heritage-led regeneration benefits from consistent visual standards

Queenborough is undergoing incremental regeneration, and the town's historic character is a key asset. A full-area ASCA:

- supports heritage-led regeneration
- improves the visual quality of the whole town
- strengthens the town's identity as a historic maritime settlement
- creates a more attractive environment for visitors and investment

This is consistent with national policy encouraging place-making and high-quality design.

7. A full-area ASCA is proportionate and reasonable

ASCA designation does not prohibit signage. It simply ensures that advertisements:

- are well-designed
- are not overly dominant
- respect the historic environment

Given the modest scale of Queenborough and the sensitivity of its townscape, full coverage is proportionate, justified, and aligned with the purpose of the designation.

B. Cellar Hill and Greenstreet Conservation Area

1. The Conservation Area has a unified historic character

Cellar Hill and Greenstreet is a compact, linear historic settlement with strong vernacular character, traditional building forms and a distinctive hillside approach. Its significance derives from the whole streetscape, not only the limited commercial

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elements.

Applying ASCA controls only to selected frontages would create inconsistent protection within an area whose character is fundamentally cohesive.

2. Advertisement pressure is not confined to the commercial core

Although Cellar Hill has limited commercial activity, CPRE's consultation response highlights the risk of signage appearing in "a front garden" or on buildings outside a designated ASCA (CPRE, Q8).

Full coverage prevents signage creep into quieter residential areas and ensures clarity for applicants and officers.

3. All character zones contribute to significance

The CA includes historic cottages, boundary walls, traditional materials and the distinctive rising topography. These elements collectively define its character.

Restricting controls to a small area would undervalue the contribution of residential frontages and transitional spaces.

4. Full coverage strengthens enforcement

A partial ASCA boundary would be difficult to justify in an area with such limited commercial differentiation. Full coverage provides a simple, defensible enforcement position.

5. Consultation responses support full coverage

CPRE Kent explicitly stated that "none" of the proposed areas should be excluded (CPRE, Q3) and that ASCA boundaries should match CA boundaries (CPRE, Q9).

6. Heritage-led regeneration benefits

Cellar Hill's character is a key asset. Consistent visual standards support incremental enhancement and reinforce the area's historic identity.

7. A proportionate and reasonable approach

Given the small scale of the CA and the sensitivity of its townscape, full ASCA coverage is proportionate and aligned with the purpose of the designation.

C. Milton Regis Conservation Area

1. The Conservation Area has a unified historic character

Milton Regis is one of Swale's oldest settlements, with a medieval core, historic street pattern and a mix of residential and commercial buildings. Its significance derives from the interrelationship of all streets, not only the High Street.

Partial designation would create a patchwork of protection inconsistent with the CA's holistic character.

2. Advertisement pressure is not confined to the proposed boundary

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Milton Regis has experienced issues with modern signage and illuminated displays, as highlighted in consultation responses. CPRE questioned why the whole CA would not be designated, noting that residents “away from the commercial areas” are unlikely to object (CPRE, Q8).

Full coverage prevents signage displacement and strengthens control.

3. Multiple character zones contribute to significance

The CA includes medieval lanes, historic terraces, landmark buildings and transitional streets. All contribute to the settlement’s identity and require consistent protection.

4. Full coverage strengthens enforcement

A partial boundary would be difficult to defend in an area with complex historic layering. Full coverage ensures clarity for applicants and officers.

5. Consultation responses support full coverage

CPRE Kent’s position that ASCA boundaries should match CA boundaries directly supports full coverage in Milton Regis.

6. Heritage-led regeneration benefits

Milton Regis has areas of vulnerability and heritage-at-risk pressures. Consistent visual standards support regeneration and reinforce the historic core.

7. A proportionate and reasonable approach

ASCA designation ensures signage respects the historic environment without prohibiting commercial activity.

D. Newington High Street Conservation Area

1. The Conservation Area has a unified historic character

Newington High Street is a cohesive historic streetscape defined by consistent building lines, traditional materials and a strong linear form. Its character is shaped by the **whole length of the High Street and its immediate approaches**, not only the commercial frontages.

Partial designation would undermine the CA’s integrity.

2. Advertisement pressure is not confined to the commercial core

Newington has a mix of commercial and residential uses, and signage creep into quieter frontages is a realistic risk. CPRE’s comments on the illogicality of excluding parts of a CA apply directly here.

3. All character zones contribute to significance

The CA includes traditional shopfronts, residential terraces, landmark buildings and transitional spaces. Each contributes to the area’s sense of place.

Restricting controls to a subset of streets would undervalue these contributions.

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4. Full coverage strengthens enforcement

A clear, unambiguous ASCA boundary aligned with the CA boundary is easier to defend and reduces the risk of inconsistent decisions.

5. Consultation responses support full coverage

CPRE Kent stated that ASCA boundaries should match CA boundaries and that no areas should be excluded.

6. Heritage-led regeneration benefits

Newington High Street's character is a key asset. Consistent visual standards support placemaking, investment and incremental enhancement.

7. A proportionate and reasonable approach

Given the modest scale of the CA and the sensitivity of its townscape, full ASCA coverage is proportionate and justified.

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