

20230568 - Heritage House, 79 - 80 High Street, Gravesend, DA11 0BH

Historic Buildings and Places 15 August 2023

FAO: Mrs Alison Webster

Address: Heritage House, 79 - 80 High Street, Gravesend, DA11 0BH
Application Ref: 20230568

Proposal: Application for Listed Building Consent for the change of use from existing use Class E to sui generis (HMO) use and office on the ground floor with alterations to the buildings.

Statutory Remit: Historic Buildings & Places (HB&P) is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). We are a consultee on all Listed Building Consent applications involving an element of demolition, as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for consulting HB&P on this application. We objected to a similar, previous application (reference: 20220930) for conversion to an HMO use due to the lack of supporting information required to inform and justify the application. Unfortunately, this application also lacks the detail necessary to assess the significance of the interiors.

At Grade II*, this is a highly listed heritage asset. Built around 1730, no. 79 and 80 are the oldest surviving buildings on the high street, having been constructed after a major fire destroyed much of the town. Their significance lies in their historic, evidential and aesthetic value, which reflect the development and growth of Gravesend through the 18th century.

The NPPF at paragraph 199 states that great weight should be given to the conservation of designated heritage assets through an understanding of the impact of a proposed development on their significance and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Unfortunately, once again, the application is not supported by a suitably detailed heritage impact assessment. At a minimum, the heritage statement should identify the age, nature and condition of the interiors, particularly those areas to be altered. The application continues to propose the removal of the doors and partitions to the upper levels to meet the needs of an HMO and this is entirely the wrong approach for a listed building. The necessary changes should be conservation led, such as upgrading doors with intumescent paint, rather than replacing them.

As submitted, the lack of detail makes it difficult to properly assess the impacts of the proposal, and therefore it does not satisfactorily address the requirements of para. 194 and 195 of the NPPF.

Other relevant NPPF (2021) policy considerations are:

- Paragraph 199: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation".
- Paragraph 200: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

Recommendation: Withdrawal of the application or Refusal

With the absence of a suitably detailed heritage impact assessment, we recommend that the applicant withdraw the current application and resubmit with the required information and, if necessary, amended plans. Without this information the LPA does not have sufficient information to inform its decision-making, in regards to the level of harm which may be caused by the proposed development to the significance of a designated heritage asset through changes to its historic building fabric.

We recommend the heritage impact assessment is prepared by a suitably qualified conservation professional and refer the applicant to Historic England's guidance on Statements of Heritage

Significance: <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/>.

If the current application is to be determined rather than withdrawn it is recommended it be refused upon the grounds of insufficient information having been submitted. The relevant policies are Policy 194, 195, 199 and 200 of the NPPF (2021).