

Old Rectory **Luddesdown Road** Luddesdown DA13 0XE38

PLANNING, DESIGN & HERITAGE STATEMENT



Demolition of the existing outbuilding at the front of the dwellinghouse and erection of a single-storey front extension in its place.

Resubmission of works previously approved under planning permission ref: 20160966

SITE DESCRIPTION AND PLANNING DESIGNATIONS

- 1.1 The Old Rectory is a large, detached, dwellinghouse located on the eastern side of Luddesdown Road. The well-defined curtilage of the dwellinghouse takes up only a small proportion of the application site, which also consists of stables, paddocks, stable buildings, tennis courts and an enclosed swimming pool (all of which are located outside of the residential curtilage).
- 1.2 A predominantly-detached outbuilding is located at the front of the dwellinghouse, within its residential curtilage, and is linked to the main building by a high wall, creating a semi-enclosed courtyard. The outbuilding serves as an ancillary space to the dwellinghouse and is not utilised in connection with the remainder of the application site.
- 1.3 No structures located within the application site are subject to a local or statutory listing; furthermore, the site is not situated within a conservation area. However, it should be noted that the application site is designated as part of the Green Belt and falls within the Kent Downs Area of Outstanding Natural Beauty (AONB).

Note: whilst officers have previously suggested that the existing dwellinghouse might warrant 'consideration' for local listing, the property has not, in fact, been included on any publicly accessible list that forms part of the Council's Local Development Framework (LDF). Moreover, no such list has been compiled through an evidence-led, adequately scrutinised selection process. The building has not been formally identified as locally listed during the assessment of any previous planning approvals (see Section 2). Furthermore, substantial evidence within subsequent sections of this statement demonstrates that the building fabric of both the existing dwellinghouse and the outbuilding at the front has been significantly altered and compromised in the past (see Section 3).

- 1.4 The application site is not subject to a Direction under Article 4 of the General Permitted Development Order 2015 (GPDO); as a result, certain extensions and alterations can take place within the confines of the curtilage of the dwellinghouse without the need for planning permission, subject to the limitations applicable to properties located within an AONB, also known as Article 3(2) land.
- 1.5 Furthermore, in absence of an Article 4 Direction, conservation area status or other relevant designation under the Planning (Listed Buildings and Conservation Areas) Act 1990 (e.g. statutory listing), the application site benefits from permitted development rights pertaining to the demolition of buildings under Class B ('building operations consisting of the demolition of a building'), Part 11 ('Heritage and demolition'), Schedule 2 of the GPDO 2015.
- 1.6 The application site is not subject to any Tree Preservation Orders. Existing trees could therefore be removed without the need for planning permission.

PLANNING HISTORY AND SUMMARY OF PROPOSALS

- 2.1 Since the establishment of the Town and Country Planning Act 1947 (i.e. the foundation of modern town and country planning), the dwelling has only been extended once in form of a single-storey side and rear “orangery” extension at the back of the building (planning permission ref: 2009:0320). No other extensions have been erected since.
- 2.2 As a result, with the exception of the orangery extension constructed sometime after 2009, the remainder of the dwellinghouse is considered “original” in the context of permitted development allowances and for assessing enlargements under Green Belt policies. Similarly, the outbuilding appears to have been in situ in one form or another since before 1947. However, outside of this context, it is clear from photographs that the building fabric of the main dwellinghouse, as well as the outbuilding at the front, has been substantially altered in the past, even prior to 1947. Historic survey maps do not rule out alterations, extensions, and the replacement of entire building elements over the years. Consequently, while the buildings, as they exist today (with the exception of the orangery extension), are considered “original” for floor area assessment purposes, there is significant doubt about the integrity of the existing dwellinghouse and outbuilding structures regarding their historic fabric, given the substantial alterations they have undergone.

Note: further evidence of past alterations to the building fabric is highlighted in subsequent sections of this document.

- 2.3 In July 2017, planning permission was granted under reference 2016:0966 for the demolition of the outbuilding at the front of the dwellinghouse and the construction of a new structure with similar dimensions and overall appearance. This new structure was to be fully attached and internally linked to the main dwellinghouse, allowing it to function as a front extension rather than as an outbuilding. While the planning conditions attached to the consent were subsequently discharged under reference 2017:0911, the permission was never implemented (on account of the site being sold) and eventually expired. It was noted during the application process that the reasoning behind demolishing the outbuilding rather than repairing it was the long-term damage caused by trees and their roots growing along the outbuilding wall. Consequently, the removal of these trees was also approved under 2016:0966, subject to replacement planting, the details of which were approved under 2017:0911.
- 2.4 More recently, planning permission was granted under reference 2023:1283 for the demolition of the existing orangery extension and the construction of a two-storey side and rear infill extension in its place. As part of this consent, approval was also granted for works to create a link between the dwellinghouse and the outbuilding at the front, similar to those approved under 2016:0966, but no longer involving any demolition.
- 2.5 Finally, in November 2024, planning permission was granted under 2024:0869 for revisions to the scheme approved under 2023:1283, namely to allow for the replacement of all existing windows with double-glazed equivalents, and minor revisions to the approved link structure.

- 2.6 Unfortunately, following the grant of permission under 2023:1283 (as modified under 2024:0869), it has become evident, after site visits by building firms, quantity surveyors, and tree surgeons, that the trees located along the front of the outbuilding have caused long-term damage to the structure. This damage necessitates its full replacement alongside the removal and replanting of these trees, as the survival of the outbuilding can no longer be supported in the long term. Therefore, it is essential to undertake the works previously approved under 2016:0966, for which permission had subsequently expired.
- 2.7 Consequently, it is proposed to demolish the existing outbuilding at the front of the dwellinghouse, as per the planning consent granted under 2016:0966, and replace it with a new structure of similar dimensions and overall appearance. This new structure will be linked to the main dwellinghouse in a manner that is visually identical to the link structure approved under the extant planning permission issued under 2023:1283 and modified under 2024:0869.

VISUAL IMPACT

Design and appearance

- 3.1 It is proposed to demolish the existing outbuilding at the front of the dwellinghouse and replace it with a structure of near-identical bulk, dimensions, and appearance, albeit linked to the existing dwellinghouse. When considered alongside the 'link structure', the proposals are visually comparable to those recently approved under application 2024:0869, as well as the earlier approval under 2016:0966.

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Image 1: Extract from the approved drawings for planning application 2016:0966, illustrating the demolition of the existing outbuilding at the front of the dwellinghouse and its replacement with a front extension of a similar appearance, albeit linked to the main house.



Image 2: Extract from the approved drawings for planning application 2024:0869.

- 3.2 Consequently, given that the impact of the scheme approved under 2024:0869 was deemed acceptable in relation to the appearance and character of the application site, as well as the openness of the Green Belt and the wider landscape of the AONB, the current proposals are considered acceptable on design and visual amenity grounds, subject to the appropriate choice of facing materials.
- 3.3 In terms of facing materials, the applicant proposes the following principal materials:
- **Facing brick:** Ibstock Tunbridge Pastone Yellow brick laid in Flemish bond with natural mortar and flush pointing
 - **Roofing materials:** Keymar handmade Kent Peg Tile - Antique
- 3.4 Full details of the proposed facing materials have been enclosed separately and are clearly annotated on the submitted proposed plans.
- 3.5 The choice of materials matches those specified and approved for the replacement outbuilding in 2017 under application reference 2017:0911, which discharged planning condition 3 ('facing materials') pursuant to planning permission 2016:0966. This earlier approval, now expired, related to the demolition and replacement of the outbuilding.
- 3.6 The applicant is willing to accept a compliance-style planning condition requiring the proposed development to be carried out in accordance with the enclosed materials schedule, as annotated on the proposed plans, unless otherwise agreed with the local planning authority.

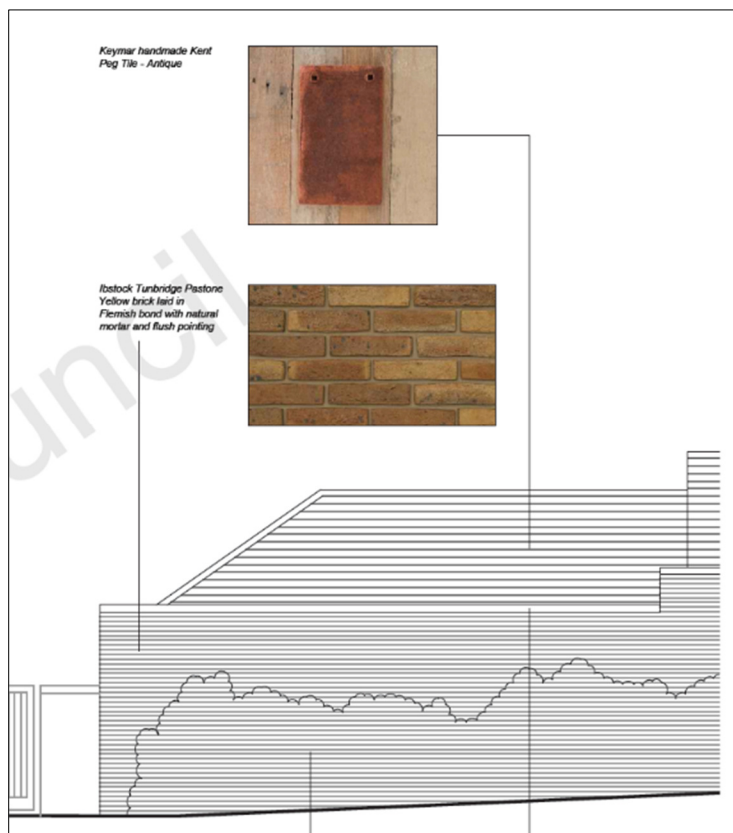


Image 3: Drawing extract from application 2017:0911 for the discharge of planning condition 3 ('facing materials') pursuant to planning permission 2016:0966 for the demolition of the existing outbuilding at the front of the dwellinghouse and its replacement with a front extension.

Principle of demolition

- 3.7 During the determination of near-identical proposals under 2016:0966, it was concluded that the demolition of the existing outbuilding at the front of the dwellinghouse was acceptable, given that it would be replaced by a new structure of similar external appearance, albeit linked to the main house.

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- 3.8 The outbuilding is considered “original” (i.e. pre-1949) for floor area assessment purposes and appears to have existed in some form prior to 1900, albeit potentially heavily reconstructed since. However, officers have previously raised no heritage concerns regarding its demolition. The officer’s report for application 2016:0966 (which granted permission for the demolition of the outbuilding) explicitly states that the proposals were “considered and assessed by the Council’s conservation architect having regard to the historic nature of the building.” In other words, no significant heritage objections were raised that would prevent the demolition and reconstruction of the outbuilding. Consequently, it would be unreasonable to suggest that the current proposals — identical in scope and nature, and being determined under the same planning policy framework (namely the NPPF, the Gravesham Local Plan Core Strategy / Local Plan Policies Map (2014), and the Gravesham Local Plan First Review – Saved Policies (1994)) — would contradict the conclusions previously reached by conservation officers.

Note: while the NPPF has been revised since the determination of application 2016:0966, an analysis of both the 2012 (copy via link below) and 2023 versions of the Framework confirms that there have been no material changes in the wording of policies relating to non-designated heritage assets.

https://www.birmingham.gov.uk/download/downloads/id/4887/bcc_4_national_planning_policy_framework_2012.pdf

- 3.9 The officer’s report for 2016:0966, in supporting the demolition and reconstruction works, also notes that “the existing linked outbuilding is damaged due to the presence of trees (including beech and sycamore) which are very close to the building.”
- 3.10 The applicant has provided letters from a tree consultant and a builder confirming that the outbuilding continues to be at risk of damage from nearby trees, and that its fabric is deteriorating to the point where demolition and reconstruction are the only viable options to prevent the outbuilding from falling into complete disrepair. If demolition and reconstruction are not permitted, the likely outcome is that the outbuilding — prominently visible from the street — will fall into long-term disrepair, potentially leading to abandonment and becoming an eyesore.
- 3.11 The builder has further confirmed that some external walls have shifted, with many bricks laid directly onto soil, making underpinning nearly impossible. Compliance with building regulations, particularly in terms of insulation and energy efficiency, would also be difficult — if not impossible — without substantial reconstruction.
- 3.12 While the possibility of re-using some of the existing building fabric (e.g. salvaged materials) has been explored, the poor condition of the tiles (see photographs) and mismatched brickwork — likely due to numerous past alterations and patchwork repairs — make this option unfeasible. Re-use would also be counterproductive in

terms of improving the outbuilding's appearance. In any case, the use of new facing materials, carefully chosen to enhance the appearance and character of the reconstructed outbuilding, was approved under application 2017:0911 for the discharge of planning conditions attached to 2016:0966 concerning facing materials.

3.13 Consequently, refusing planning permission for the demolition of the existing outbuilding and the construction of a replacement structure — already granted in principle under 2016:0966 and 2017:0911, and identical in design to that approved under 2024:0869 — would be unreasonable and likely result in further deterioration of the structure.

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3.14 While conservation officers have recently suggested, on a single occasion during discussions related to planning permission 2023:1283, that the dwellinghouse might warrant consideration as a “non-designated heritage asset”, the demolition and reconstruction of the existing outbuilding remain acceptable in principle. This conclusion is supported by the fact that there have been no changes in relevant circumstances or policies regarding non-designated heritage assets since the demolition was previously approved under 2016:0966 and 2017:0911 (c.f. paragraph 3.8 above). At that time, concerns about the long-term durability of the structure were sufficient to justify demolition, and logically, its condition can only have deteriorated further since then.

3.15 There are additional reasons why the dwellinghouse, and more specifically the outbuilding at the front of the dwellinghouse, may warrant less weight as a non-designated heritage asset in decision-making, particularly when considering proposals identical in nature to the works previously approved under 2016:0966. These are:

(i) Heritage and planning officers did not indicate that the building or any part of its curtilage should be considered for local listing during the determination of any of the following planning applications related to the site: 2023:1283, 2023:0656, 2016:0966, and 2009:0320.

(ii) Contrary to the provisions of paragraphs 198 and 199 of the National Planning Policy Framework (2023), the Council does not maintain an up-to-date local list of non-designated heritage assets, nor is any such list “publicly accessible [...] as part of policy-making or development management” (para. 119).

(iii) The absence of a clearly defined, plan-led, evidence-based, transparent, and publicly available, properly scrutinised local list also contradicts the recommendations of Historic England Advice Note 7 (Second Edition), Local Heritage Listing: Identifying and Conserving Local Heritage. Paragraphs 9, 12, and 17 state that “the legitimacy and weight within the planning system of local heritage lists is increased when the list has been prepared in accordance with defined selection criteria, and has been subject to public consultation” (para. 17) and that “The more information that can be provided about the significance of the asset and the reasons for its inclusion on the local list, the more effective its identification as a locally listed heritage asset will be” (para. 12). This must be “based on sound evidence” (para. 9).

3.16 Whilst a structure has seemingly existed in front of the dwellinghouse in some form since at least 1888, its depiction varies across historic maps. This variation suggests

the possibility that the outbuilding has been modified or partially reconstructed over time, particularly after 1915, likely to facilitate its use (or at least part of it) as a domestic garage for housing combustion-engine vehicles. Such and other alterations would have eroded the building's original function and character.

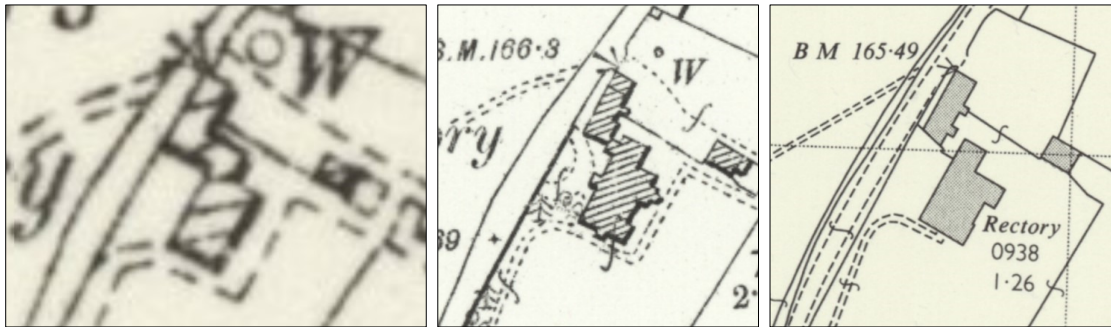


Image 4: Historic maps from 1888-1915 (left), 1892-1914 (middle) and 1947-64 (right) OS series.

- 3.17 Photographs confirm that, similar to the main dwellinghouse, the fabric of the outbuilding has been heavily compromised in the past. Various patchwork repairs are visible in multiple locations, and, notably, the structure consists of at least three different types of mismatched brickwork, evenly distributed. An original door or window opening at the front of the outbuilding also appears to have been infilled (it is proposed to reinstate this opening as part of the reconstruction process). Combined with evidence that parts of the building were constructed directly on top of soil, while other parts are built on a concrete base, these factors further raise questions about the legitimacy of considering the structure for local listing, given the significant erosion of its building fabric and character.



Image 5: Photographs of front outbuilding, highlighting heavily-compromised building fabric (refer to condition report for photographs highlighting internal damage).

3.18 Therefore, on balance, by re-approving the plans to demolish and rebuild the outbuilding (similar to the consent granted in 2017, which lapsed due to a change in ownership), the long-term retention of a high-quality building that closely resembles the existing structure can be secured.

3.19 Finally, fall-back options may exist under the General Permitted Development Order 2015 (as amended) for the demolition of the existing outbuilding under Class B ('demolition of buildings'), Part 11 ('Heritage and demolition'), Schedule 2 of the Order. This provision permits the demolition of buildings outside conservation areas (including locally listed structures), subject to an application for prior approval "as to the method of demolition and any proposed restoration of the site." This is an avenue the applicant may need to explore further if permission for the demolition and reconstruction of the outbuilding were to be refused, contrary to the conclusions reached in the previous consent granted under 2016:0966.

Green belt

3.20 Paragraph 149 of the NPPF permits 'appropriate' extensions to dwellings located within the Green Belt provided that such enlargements do not result in "disproportionate additions over and above the size of the original building". Paragraph (ii) of Policy C13 of the Gravesham Local Plan (Saved Policies, 2014) limits householder extensions within the Green Belt to no more than 33% of the gross external floor area (GEA) of the original dwellinghouse.

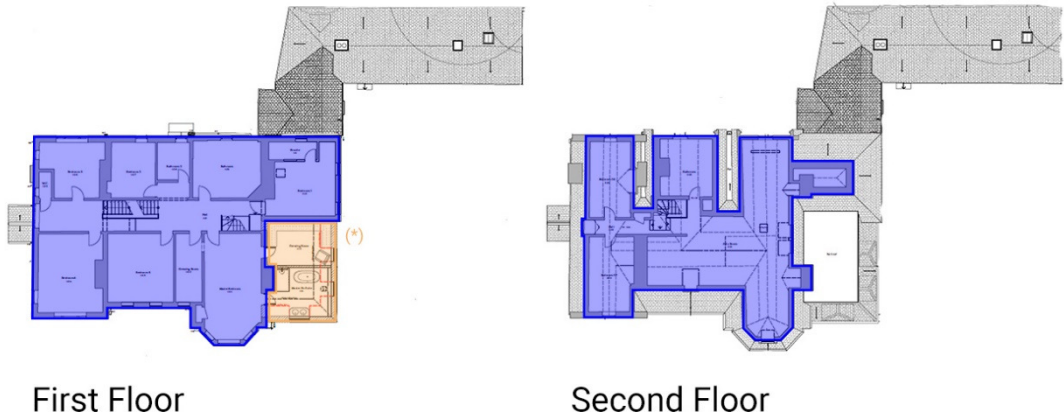
3.21 According to historic Ordnance Survey maps and planning records, the original dwellinghouse has undergone only one extension since 1947, specifically in the form of the side and rear 'orangery' extension (ref: 2009/0320). In other words, with the exception of the orangery extension, the existing dwellinghouse is as originally constructed. Historic maps also confirm that the outbuilding at the front of the property is original (pre-1948).

3.22 The following table and associated illustrations confirm that the net additional Gross External Area (GEA) resulting from the demolition of the existing outbuilding and its replacement with a front extension would represent no more than 3% of the GEA of the original dwellinghouse if undertaken independently, and no more than 13% if carried out alongside the development approved under 2024:0869 (the extant planning permission for a two-storey side and rear extension to replace the existing non-original orangery). In other words, the 33% rule of thumb outlined in the Gravesham Local Plan is satisfied.

Structure	GEA	Colour on Plan
(1) Original dwellinghouse	660.0 sq.m. (*)	Blue
(2) Original front outbuilding (to be rebuilt)	84.0 sq.m.	Purple
(3) Unbuilt side/rear extension (2024:0869)	65.4 sq.m.	Orange
(4) Proposed net additional GEA (link structure)	20.6 sq.m.	Green
<i>Proposed net additional GEA (over original) (4) as % of original dwellinghouse (1) - if carried out in isolation</i>	3.12%	
<i>Proposed net additional GEA (over original) (3+4) as % of original dwellinghouse (1) - if carried out in tandem with 2024:0869</i>	13.03%	

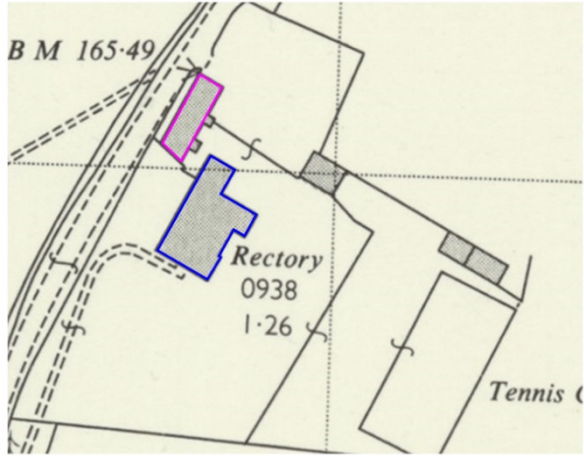
Proposed GEA including rebuilt outbuilding (2+4) as % of original dwellinghouse (1) - if carried out in isolation	15.84%	
Proposed GEA including rebuilt outbuilding (2+3+4) as % of original dwellinghouse (1) - if carried out in tandem with 2024:0869	25.75 %	

(*) excl. original cellar (which measures 57.50 sq.m. GIA) – all percentages shown would be *lower* if the GEA of the original cellar was included in the calculations



(*) = UNBUILT REPLACEMENT TWO-STORY SIDE/REAR
EXTENSION APPROVED UNDER 2024:0869

ORIGINAL DWELLINGHOUSE
AND OUTBUILDING (OS MAP, 1948)



- 3.23 Crucially, even if, for the sake of argument, the GEA of the existing outbuilding were considered to constitute “new” floor area due to its demolition and reconstruction (despite being regarded as “original” for floor area assessment purposes), the total GEA of the reconstructed outbuilding would still amount to no more than 25% of the GEA of the original dwellinghouse, even when combined with the development approved under 2024:0869.
- 3.24 In this purely hypothetical scenario, the 33% guideline would still be satisfied. Clearly, the figure of 25% significantly overstates the actual (perceived) impact of the proposed development on the openness of the Green Belt, which will be identical to that of the scheme recently approved under 2024:0869. While that scheme did not involve the demolition and reconstruction of the existing outbuilding, the outcome of the previously approved scheme and the current proposal is exactly the same, including their impact on the openness of the Green Belt. In other words, it would be entirely unreasonable to determine that the current proposals would have an unacceptable impact on the openness of the Green Belt when the impact of the previously approved scheme (with the same visual impact, overall dimensions, and floor area) was deemed acceptable.
- 3.25 Furthermore, the *purpose* of the 33% rule of thumb is to uphold the *objectives* of paragraph 142 of the NPPF, namely “to prevent urban sprawl by keeping land permanently open”. As the physical manifestations of the currently proposed scheme (i.e. visual impact) are identical to those recently approved under 2024:0869, these objectives continue to be met.
- 3.26 Finally, no concerns were raised during the determination of the 2017 planning permission (ref: 2016:0966), which allowed the demolition of the front outbuilding and its reconstruction as a front extension connected to the dwellinghouse, regarding its impact on the openness of the Green Belt. Officers noted that, following the High Court case of *Sevenoaks District Council v Secretary of State for the Environment and Dawe* (1997), the existing front outbuilding could already be considered part of the original dwellinghouse for Green Belt floor area assessment purposes. As such, only the net additional area proposed (i.e. the link structure) required further consideration under Green Belt policies.

AONB

- 3.27 During the determination of 2016:0966, officers reached the following conclusions regarding the impact of the proposals - virtually identical to those currently sought - on the character and appearance of the Kent Downs Area of Outstanding Natural Beauty (AONB):

The application site is located in the Luddesdown Downs Landscape Character Area and as such, Policy CS12 of the Local Plan Core Strategy is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.

More critically the site is within the Kent Downs Area of Outstanding Natural Beauty (AONB) and policies of the adopted Kent Downs AONB Management Plan are a relevant consideration.

In landscape terms the front extension/outbuilding is effectively replacing an existing outbuilding of similar form, height and bulk and in an identical location. It is not considered that the frontage development would result in material harm to the landscape character

Although with the loss of trees the replacement will become more visible the applicants propose replacement tree planting and hedging to the site.

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On balance whilst there will be some impact in landscape terms from the development at the front and rear of the property it is assessed that this is not sufficiently harmful as to justify refusal on landscape grounds.

- 3.28 The aforementioned assessment was conducted under a local policy framework that remains in force today. The current local development plan, which guides decision-making, still comprises the Gravesham Local Plan Core Strategy and Local Plan Policies Map, alongside Supplementary Planning Guidance SPG1 ('Landscape Character'), all adopted in 2014. Although the Kent Downs AONB Management Plan was revised in 2021 (third revision), it builds on the original plan adopted in April 2004 and first revised in April 2014. Importantly, no changes in the wording of the third revision undermine the conclusions reached by officers in 2017¹.
- 3.29 Consequently, given that the proposals were not considered detrimental to the character and appearance of the Kent Downs AONB in 2017, it would be unreasonable to suggest otherwise in 2024 for a development that is virtually identical and being undertaken within the same physical context.

¹ The previous iteration of the Management Plan and associated Luddesdown area character appraisal can be viewed at <https://kentdowns.org.uk/wp-content/uploads/2018/04/KDAONB-Management-Plan.pdf> and https://www.kent.gov.uk/data/assets/pdf_file/0005/56219/Landscape-Assessment-of-Kent-volume-2.pdf

IMPACT ON NEIGHBOURING AMENITY

- 4.1 There are no neighbouring properties within the vicinity of the proposed works. Matters pertaining to neighbouring amenity are therefore not material to the application.

OTHER MATERIAL PLANNING CONSIDERATIONS

Flooding

- 5.1 Whilst part of the application site is located in an area with a high risk of flooding from surface water, there is no risk of flooding from surface water within the curtilage of the dwellinghouse (where the works are proposed). The proposed extension will therefore have no material impact on flood risk. Additional evidence in form of mapping data is contained within the submitted Flood Risk Statement.
- 5.2 No concerns were raised with regards to flood risk during the determination of any of the previous approvals for planning permission, including 2016:0966 (for the demolition of the front outbuilding and its reconstruction as a front extension connected to the dwellinghouse) and 2024:0869 (for the construction of a link structure between the front outbuilding and the dwellinghouse).

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Trees and landscaping

- 5.3 As acknowledged by officers during the assessment of planning permission 2016:0966 (for the demolition of the front outbuilding), some of the trees located in front of the outbuilding (three at the time, marked T1 to T3) had caused long-term damage to the structure and needed to be removed to prevent further harm not only to the existing structure but also to any replacement, which was to be built in a more stable manner with proper footings and foundations. Consequently, when planning permission was granted for the demolition and replacement of the outbuilding, the removal of the three trees in front of the outbuilding was also approved, subject to the planting of replacement trees further north within the application site, along the public highway.



Image 6: Aerial photograph showing position of proposed replacement trees. For further details, refer to supporting plans, letter from tree surgeon and planting scheme.

- 5.4 Unfortunately, due to a change in ownership of the application site, the planning permission lapsed. Since then, the need to remove the previously identified trees has become even more pressing. In fact, due to poor health, one of the trees previously identified on the plans from 2016 (T3) has since been removed, leaving only trees T1 and T2 in situ.
- 5.5 A letter is enclosed from a tree specialist confirming that it is necessary to remove the remaining trees (T1 and T2) located at the front of the outbuilding.
- 5.6 Whilst trees T1 and T2 could be felled by the applicant without the need for planning permission (as they lie entirely within their land), in the interest of presenting a scheme to planners that reflects good stewardship and enhances the site, the applicant proposes their removal as part of the current proposals to reconstruct the outbuilding. As per the previous consent, the applicant proposes the planting of four new trees north of the outbuilding, as well as a replacement hedge in front of the outbuilding. Their retention can be secured through the imposition of a suitably worded compliance-style planning condition, improving the long-term landscape amenity of the site.
- 5.7 The position, number, and species of trees proposed (as well as the replacement hedge) will be the same as those previously approved under application reference 2017:0911, which discharged planning condition 4 ('replacement landscaping') pursuant to planning permission 2016:0966. Full details are provided within the enclosed Planting Scheme.

Archaeology

- 5.8 The application site is not located within an Area of Archaeological Potential as defined under the Gravesham Local Plan Core Strategy (2014) and associated Proposals Map.
- 5.9 With the exception of the new "link structure" proposed between the reconstructed outbuilding and the existing dwellinghouse, all excavation will be confined to the existing building footprint, thereby limiting the potential for any harmful impact on archaeological remains.
- 5.10 Therefore, as per the conclusions drawn from previous planning assessments at this site, the need for any planning conditions pertaining to archaeology is not considered to meet the statutory tests outlined in the NPPF.
- 5.11 Finally, it is noted that some excavation could already take place within the confines of the existing buildings without the need for planning permission, provided that such works do not result in a material impact on the *external appearance* of any buildings. In the absence of such alterations, these works would not constitute "development" under Section 55 of the Town and Country Planning Act.

ADDITIONAL SITE PHOTOGRAPHS

6.1 Overleaf.









