



Delegated Report

Approval of Details Application

Application no: 20260382

Location: 20 Stone Street Gravesend Kent DA11 0NP

Description: Application for the approval of condition 3 (Internal Partition Walls), condition 4 (Fire Doors), condition 5 (Secondary Glazing), condition 6 (Fire and Sound Proofing), condition 7 (External Lime Render), condition 8 (Pipework and Ventilation) and condition 9 (Refuse and Recycling Storage) attached to planning reference number 20250339.

Applicant: Forma Property

Site Visit Date: N/A

Listed Building Consent was granted for Application for Listed Building Consent; Internal and external alterations to upper floors in association with change of use from commercial to residential use on 11 June 2025 under application ref. 20250339. This was subject to a number of conditions including nos. 3, 4, 5, 6, 7, 8 and 9 which this application seeks to discharge.

The information that has been submitted with this application is:

- Application form;
- Un-numbered drawing (1:1 Secondary Glazing Detail);
- Drawing no. P202 Rev. 1 (Proposed Second Floor Plan New Walls);
- Un-numbered drawing (Proposed Bin Store);
- Drawing no. P201 Rev. 1 (Proposed First Floor Plan New Walls);
- Drawing no. P702 (Acoustic Floor Build-up Detail);
- Drawing no. P121 (Separating walls (Between flats and communal areas));
- Drawing no. P06 Rev. 1 (Proposed Elevation 1);
- Condition Release document.

Consultations

GBC Conservation Officer

I'm concerned with the proposed details, they lack consideration of the historic fabric. Condition 3 - The internal partition wall proposals show replacement of the spine wall between the front and back rooms on the ground floor which will result in the loss of ceiling cornices, which must be retained and remain visible (they survive on the first floor as well) The drawings need revising to show retention of the existing spine wall and all cornices. Likewise the proposed dropped ceiling will result in the loss of the ceiling cornices and so an alternative proposal needs to be designed where the cornices remain visible. Condition 4 - The submission do not comply with the condition for detail drawings and the indication of six panel doors is unacceptable as they are not appropriate to this listed building. Condition 5 - The secondary glazing system would be acceptable but the detail drawing does not match the existing sash window frame and architrave detail as seen in the heritage statement photographs. There is a risk of damage to the existing box frame and window architrave if not properly installed due to the inaccurate drawing. Condition 6 - as mentioned above this proposals will result in damage or harm to the appearance of the ceiling cornices that exist on

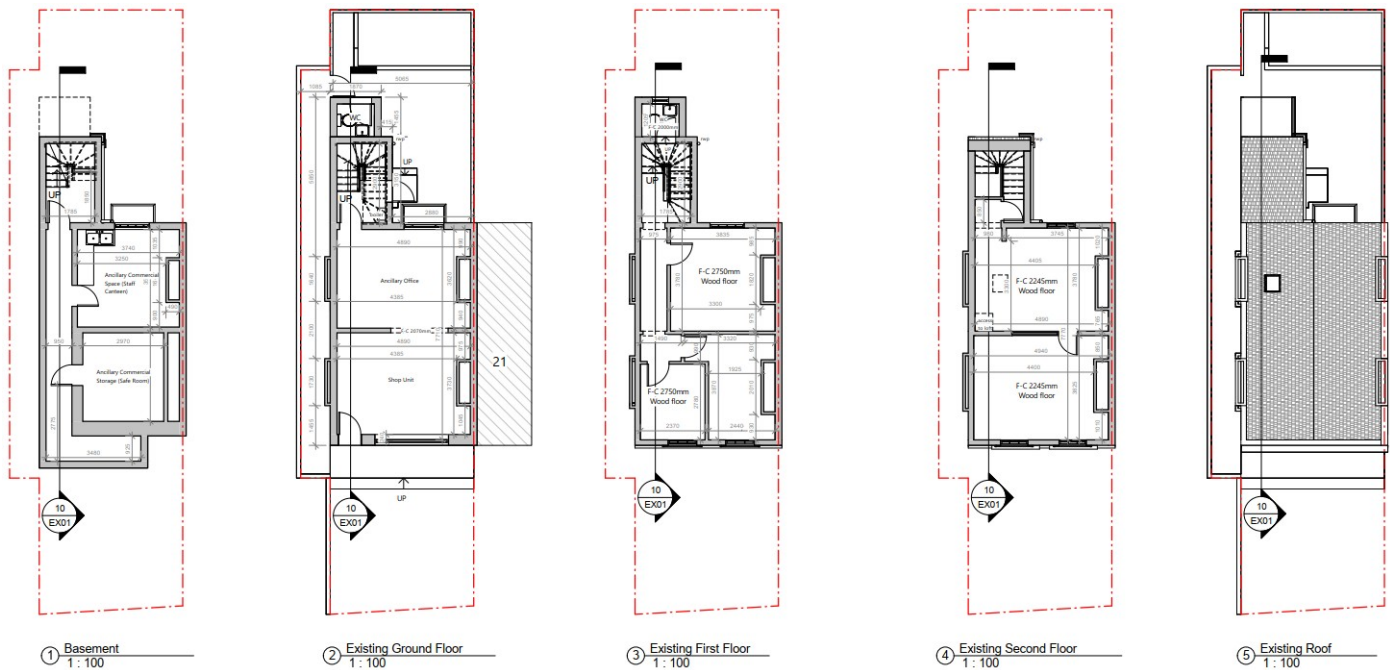


ground and first floor levels and the design solution needs to be reconsidered to take this into account. Condition 7 - Presumably the existing pebble dash will be removed before this is applied, Celtic Sustainable External Lime Render is acceptable. Condition 8 - There are no details of soil and rain water goods material - should be cast iron or similar. There are no details of external ventilation proposals for bathrooms and kitchens. Condition 9 - Refuse Store, No comment.

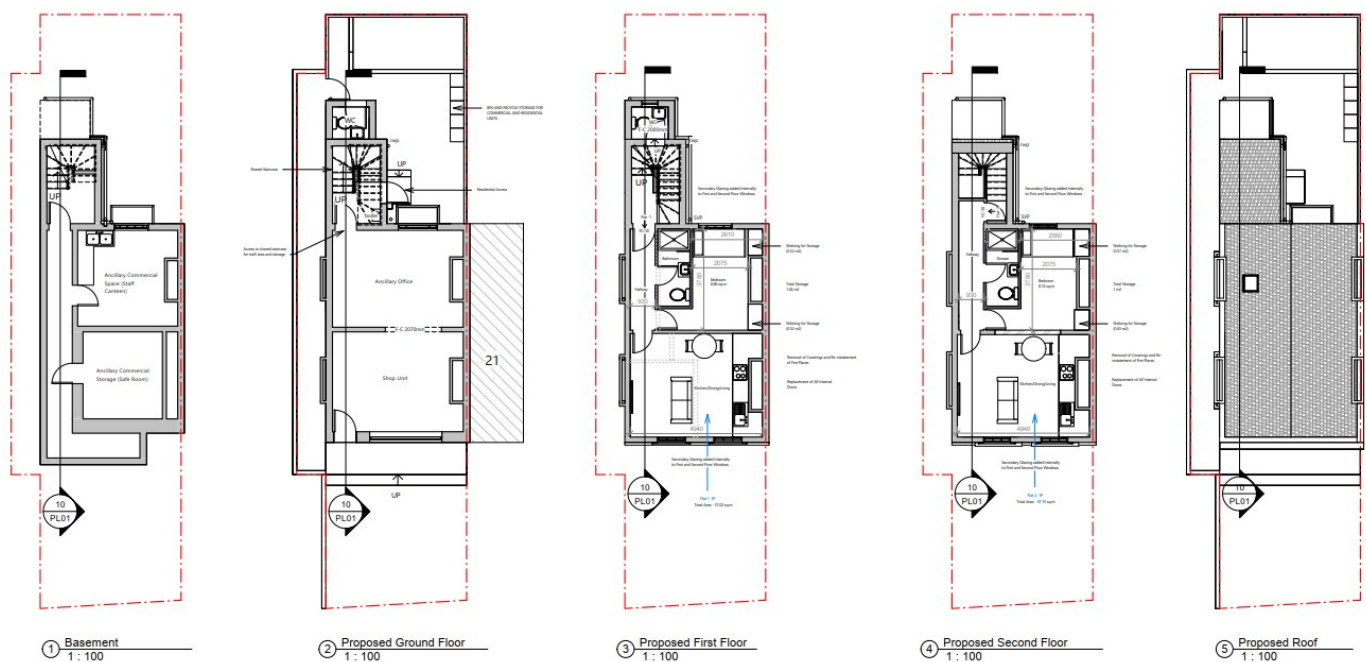
Analysis

In assessing the submitted details, it is thought helpful to insert the existing and approved floor plans here for ease of reference:

Existing



Approved



Condition 3

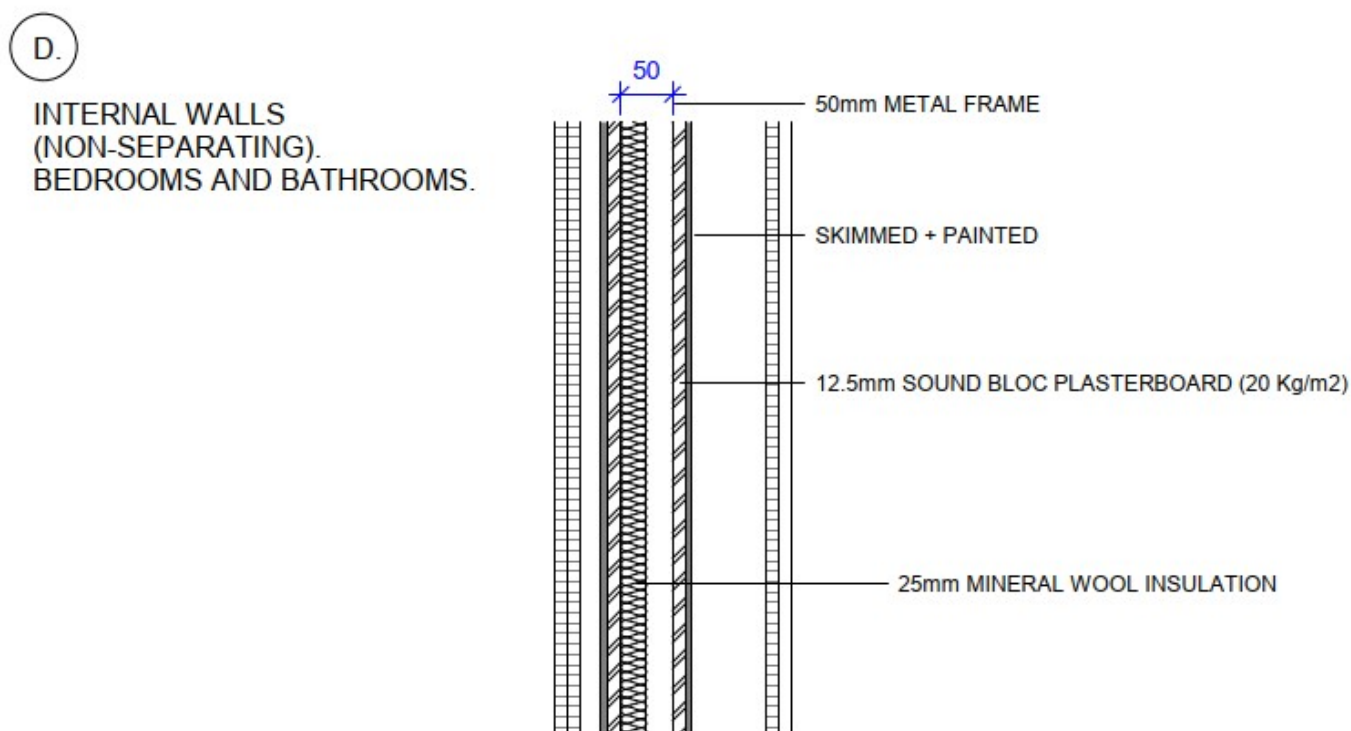


Prior to the installation of any new internal partition walls, detailed drawings of all new internal partition walls including plans and sections of the intersections with existing walls/ceilings/cornices/skirting boards shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

This condition was attached as there were new walls proposed in the back rooms at first and second floor levels to form shower rooms and details of those new walls were needed and how they would adjoin with the existing walls and architectural details.

On drawing no. P121 Separating walls (Between flats and communal areas) there is a detail shown entitled 'Detail D Internal Walls (Non-separating) bedrooms and bathrooms' which is as follows:



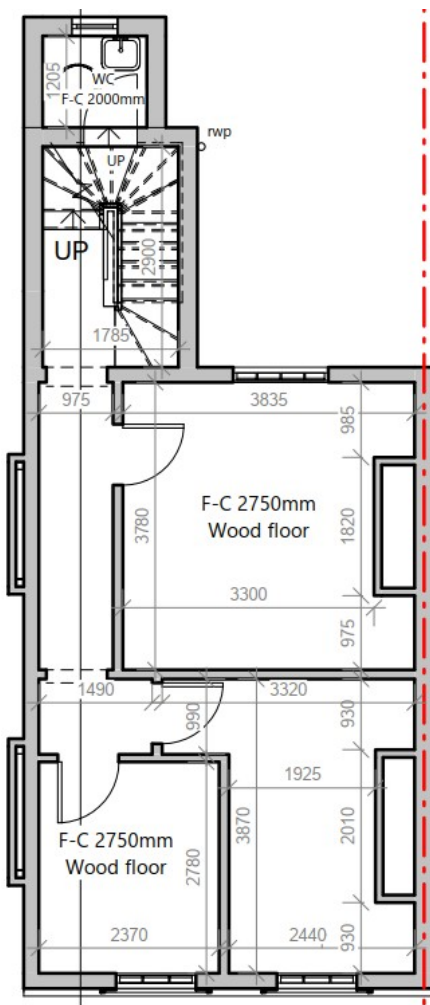
This shows a segment of the proposed internal wall for the new shower rooms however and does not show the whole wall and how it would relate to the existing walls/ceilings/cornices/skirting boards. On drawing no. P202 Rev. 1 'Proposed Second Floor Plan New Walls' there is some more information shown in terms of an acoustic ceiling and with an annotation stating that there is no existing coving on site although that is not true as there is cornicing still present in the building. The details are generic and it is not known where they are in relation to the whole area of the flat. The condition requires full details of **all** new internal partition walls including plans and sections of the intersections with existing walls/ceilings/cornices/skirting boards, not just one small generic detail where it is not known even where it is. This has not been submitted and therefore insufficient detail has therefore been submitted for condition 3.

On another point the Conservation Officer states that the details show that the internal partition wall proposals show replacement of the spine wall between the front and back rooms on the ground floor. This is actually an existing situation and is not proposed. However, the submitted details do show the proposed removal of walling at first and second floor levels which was not permitted in Listed Building Consent ref. 20250339.

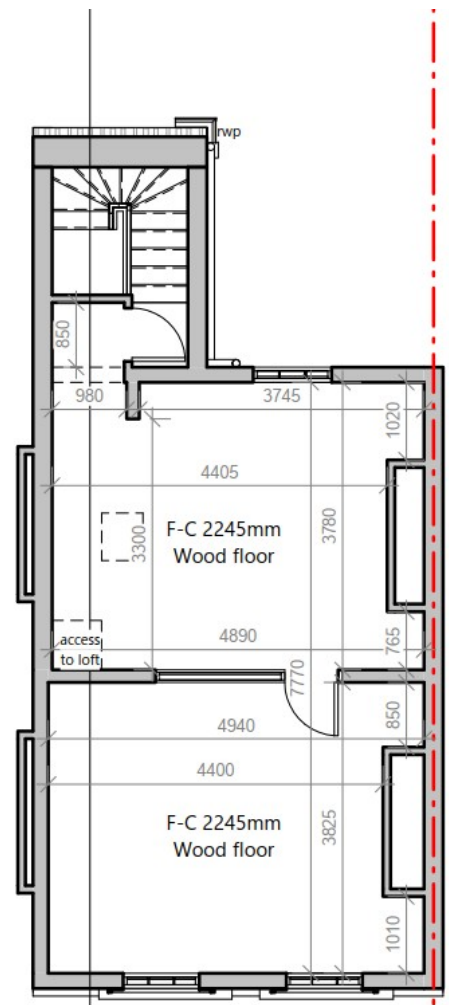
For ease of reference close up views of the existing and approved first and second floor levels are as follows:

Existing first and second floor:

First floor



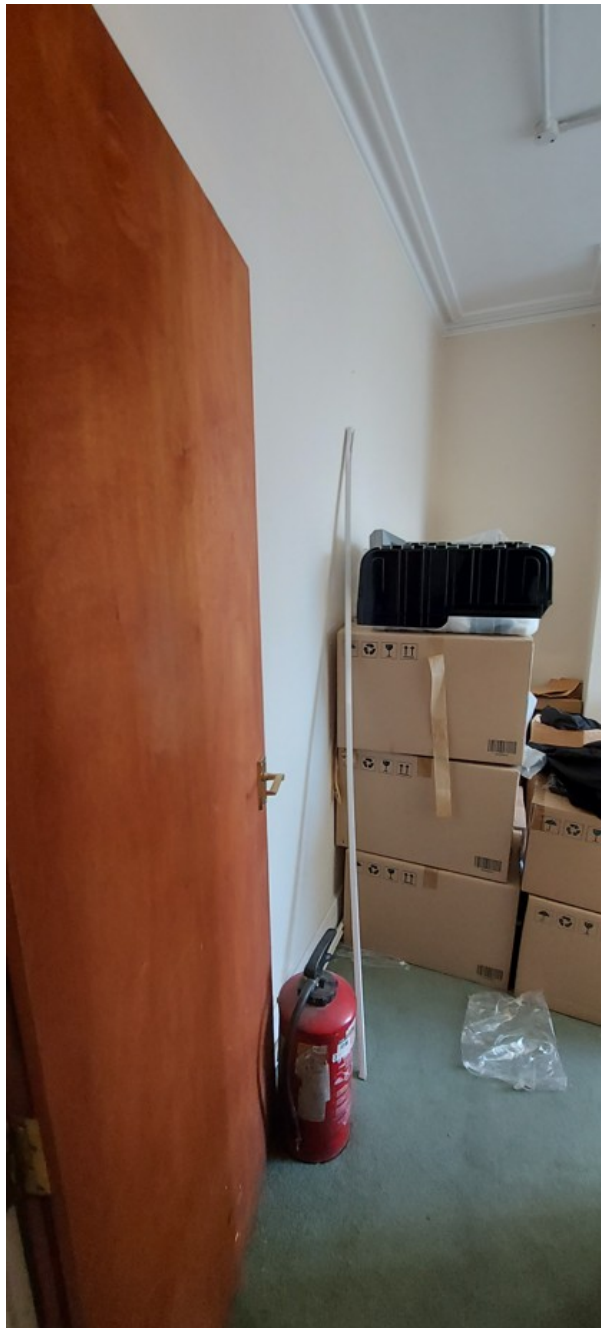
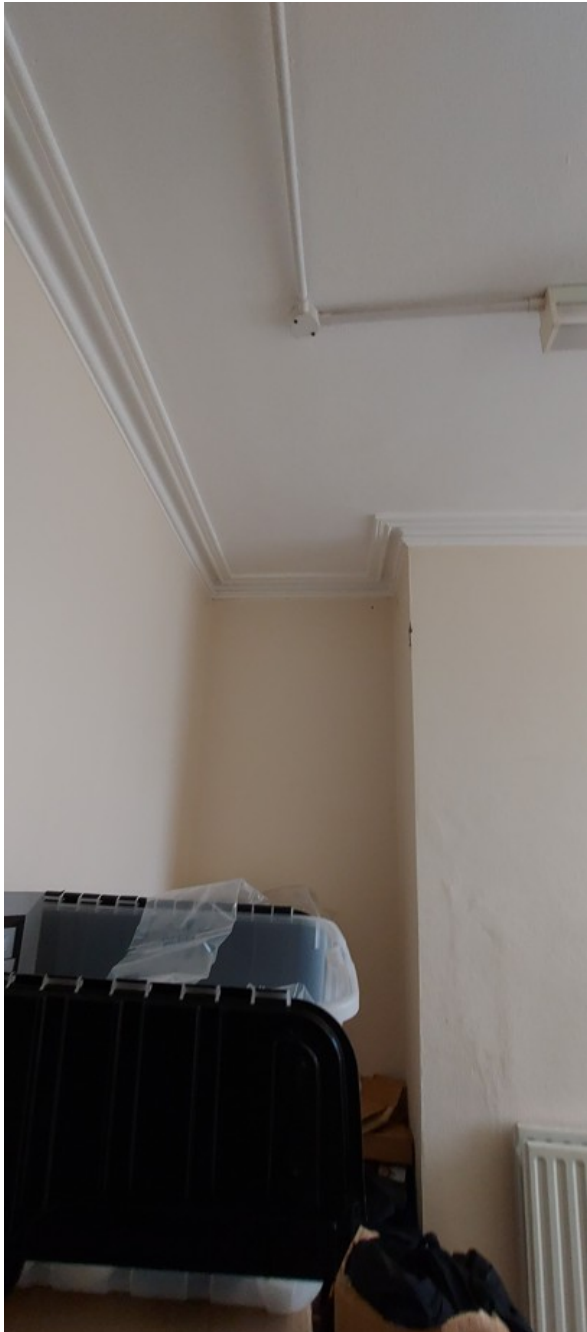
Second floor



From the site visit the dividing wall at first floor level was seen as follows:



View from doorway of the first rear room looking inside, the dividing wall between the rear and front rooms is to the right



Views from the inside of the first floor front room looking north, the dividing wall between the front and rear rooms is to the left

In terms of the second floor level, at some point in time and as seen at the site visit for 20250339 the central part of the existing wall between the front and back rooms at second floor level has been removed and replaced with a large window with wall below and a door. This is an existing change which was seen at the site visit for 20250339 and for which no Listed Building Consent has been granted for, it is not known when it was carried but there is no immunity for breaches of Listed Building Consent. See photo below of this window and door where the original central section of the wall has been removed at some point in time:



View from inside the rear room at second floor level looking towards the front room



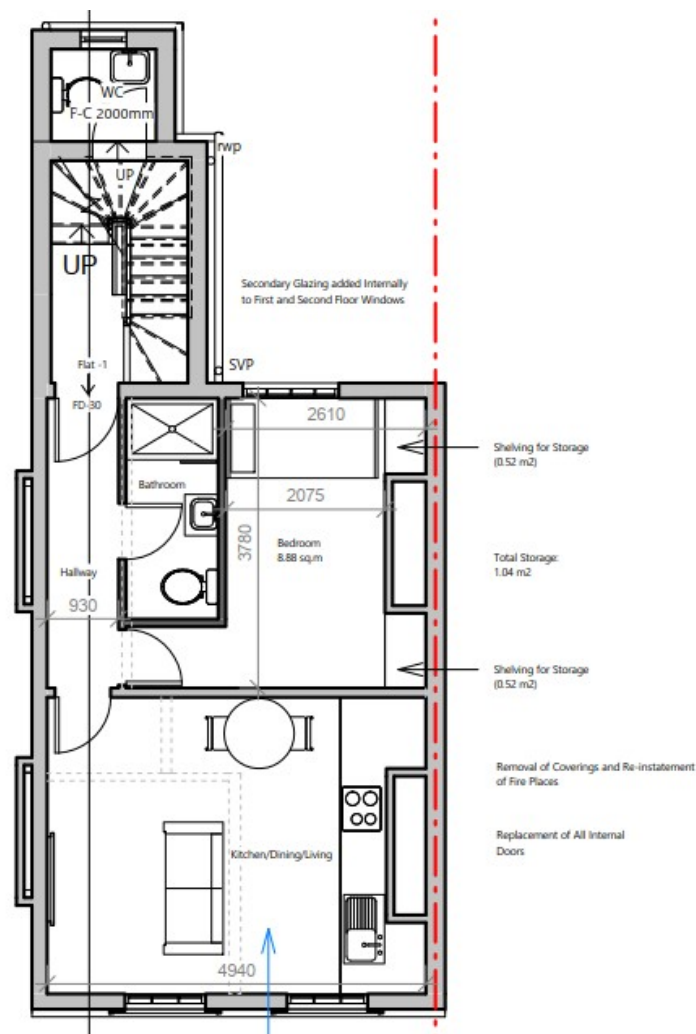
View from inside the front room at second floor level looking towards the rear room

In approval ref. 20250339, the dividing wall at first floor was shown to be retained and at second floor the removed section of walling was shown to be reinstated.

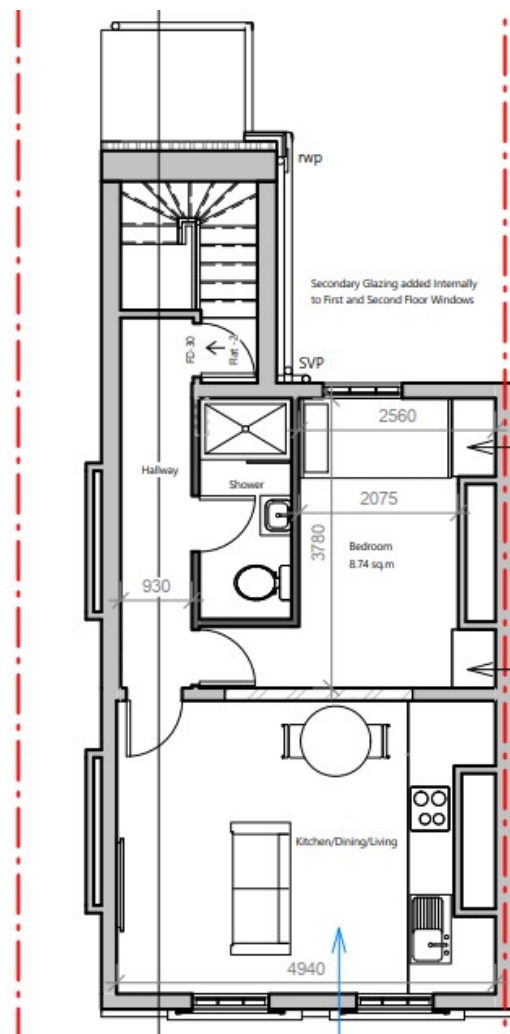
The close up views of the approved first and second floor levels are as follows:



First floor



Second floor

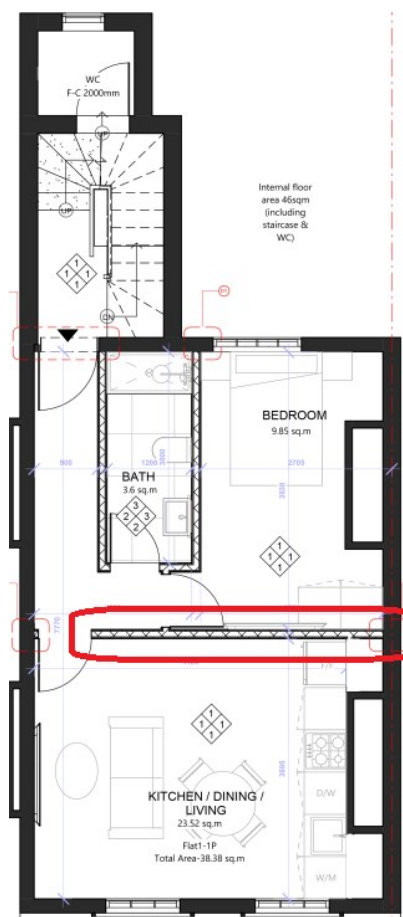


In the submitted details, however, it is therefore clear that these show the removal of the entire section of the dividing wall between the front and back rooms at first floor level and the removal of the remaining parts of the wall at second floor level.

Please see below what is proposed in this approval of details application in terms of the removal of the dividing walls at first and second floor levels – note the new wall fabric which is not what was approved:



First floor



Second floor



The removal of the entire dividing wall between the front and rear rooms at first floor level and the remaining sections of the wall at second floor level does not have approval in the approved application and is new work proposed that would require Listed Building Consent. It cannot be dealt with under this approval of details application but in any case, such a proposal would not be acceptable.

It would result in the removal of the entire dividing wall at first floor level and the removal of the remaining parts of the wall at second floor level. As the Conservation Officer points out, the removal of the wall would also result in the loss of ceiling cornices, which he states must be retained and remain visible and that they survive on the first floor level. He also notes how the proposed dropped ceiling which is proposed will result in the loss of ceiling cornices and so an alternative proposal needs to be designed where the cornices remain visible.

From the site visit (photos above) it could clearly be seen that there is original/period decorative corninging remaining at first floor level on the front room side of the dividing wall (with simpler corninging on both the front and rear sides of the dividing wall at second floor level).

The Conservation Officer advises that the drawings need revising to show the retention of the remaining parts of the wall and all cornices.

In summary, insufficient details have been submitted of all new internal partition walls including plans and sections of the intersections with existing walls/ceilings/cornices/skirting boards. Furthermore, the details show the removal of the dividing wall between the front and back rooms at first floor level and the remaining



parts of the dividing wall between the front and back rooms at second floor level which is not part of Listed Building Consent reference 20250339 and would require Listed Building Consent in its own right. The proposed details would be harmful to the architectural and historic interest of this grade II listed building and contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR).

It is therefore considered that condition 3 cannot be discharged.

Condition 4

Prior to the installation of any new fire doors, 1:10, 1:2 or 1:1 section drawings showing the door in the wall shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

In response to this condition, no 1:10, 1:2 or 1:1 drawings have been submitted. The only detail showing doors is 1:20 and as the Conservation Officer states, this shows a 6 panel door which would not be acceptable for this listed building.

In summary, insufficient details of the proposed fire doors have been submitted as they at a scale of 1:20 and in any case the proposed 6 panel doors would not be appropriate for this listed building and would therefore be harmful to its architectural and historic interest. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR).

It is therefore considered that condition 4 cannot be discharged.

Condition 5

Prior to the installation of any secondary glazing, 1:10, 1:2 or 1:1 details of the secondary glazing and how these fit into the existing window reveals shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

In response to this condition, one drawing has submitted which has the following detail at 1:1:



The Conservation Officer advises that the secondary glazing system is acceptable but that the detail in the drawing does not match the actual sash window frame of the windows as seen in the photographs in the Heritage Statement. They advise that there is a risk of damage to the existing box frame and window architrave if the secondary glazing is not properly installed due to the inaccurate drawing and therefore it is



pivotal that the secondary glazing details drawing shows the actual sash window frame detail of the existing windows.

In summary, inaccurate details have been submitted of the proposed secondary glazing as the sash window frame of the existing windows have not been drawn accurately and there is therefore a risk of damage to the existing box frame and window architrave if the secondary glazing is not properly installed due to the inaccurate drawing which would be harmful to the architectural and historic interest of this grade II listed building. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR).

It is therefore considered that condition 5 cannot be discharged.

Condition 6

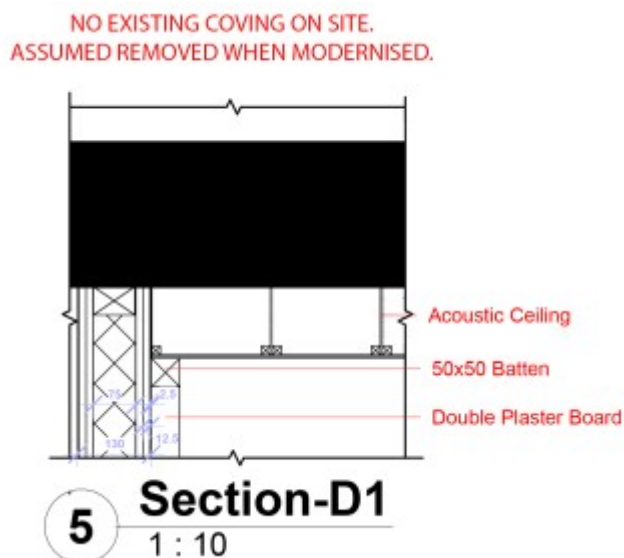
Prior to any fire or sound proofing works, full details of the fire and sound proofing works shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

It is stated that the fire and sound proofing strategy will:

- Use breathable and non-invasive build-ups, including:
 - Mineral wool insulation
 - Lime-based plasters where appropriate
- Avoid:
 - Impermeable membranes on historic walls
 - Fixing into decorative plasterwork
- Apply upgrades:
 - Within new partitions rather than historic walls where possible
 - As independent linings, leaving original fabric intact

On drawing nos. P201 Rev. 1 'Proposed First Floor Plan New Walls' and P202 Rev. 1 'Proposed Second Floor Plan New Walls' an acoustic ceiling is shown as follows:



As stated above in relation to the new internal wall condition no. 3, the Conservation Officer advises that such a dropped ceiling would not be acceptable as the proposals would result in damage or harm to the appearance of the ceiling cornices that exist at first floor level and the design solution needs to be reconsidered to take this into account. An acoustic floor is proposed which the Conservation Officer makes

no comment on.

As stated above for condition 4, insufficient scale drawings of the fire doors have been submitted and they are proposed to be 6 panel doors which is not acceptable for this listed building in any case.

In summary, the proposed fire and sound proofing works by virtue of the proposed acoustic ceiling and fire doors would cause harm to the architectural and historic interest of this grade II listed building and contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR).

It is therefore considered that condition 6 cannot be discharged.

Condition 7

Prior to the application of the external lime render on the side/gable wall details of the colour shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

For the lime render it is proposed to use Celtic sustainables in Chalk Lime Render colour.

The proposed lime render will replace the existing cementitious pebbledash with breathable lime render and the colour is a traditional chalk colour.

The Conservation Officer advises that presumably the existing pebble dash will be removed before this is applied and that the Celtic Sustainables External Lime Render is acceptable.

As it is stated that the lime render will replace the existing pebbledash, this addresses the Conservation Officer's requirement that it does. He also finds the colour acceptable which would be a neutral colour.

In summary, sufficient details have been submitted for condition 6 and the proposed colour 'Chalk Lime Render' would not harm the architectural and historic interest of this grade II listed building. As such the proposal is compliant with Policy CS20 (LPCS) and saved Policy TC2 (LPFR).

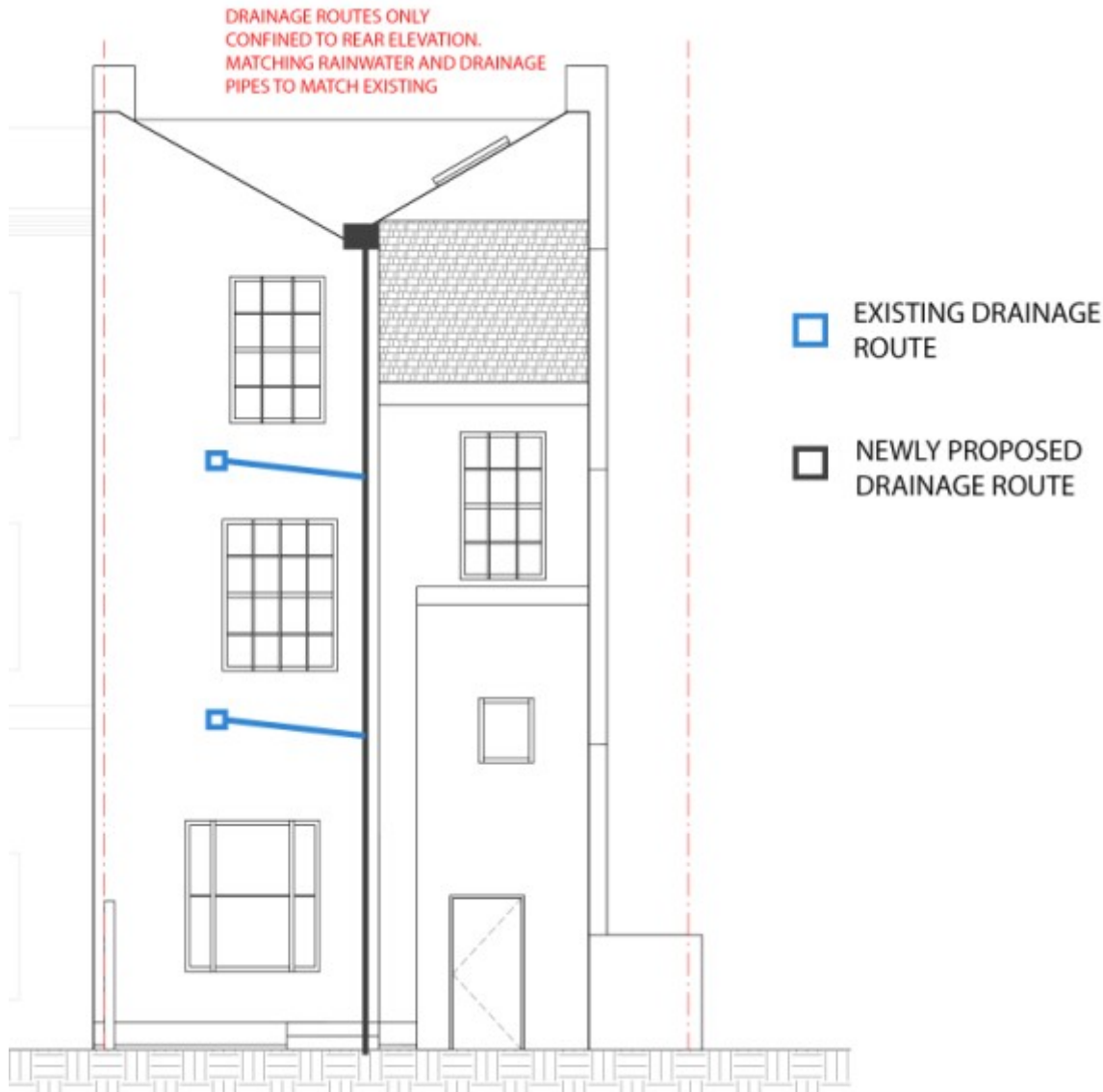
It is therefore considered that condition 7 could be discharged (which could only be done if all other conditions are acceptable also as split decisions cannot be made).

Condition 8

Prior to the reconfiguring of any pipework and insertion of any new pipes or vents, full details of the location, appearance and finish of all pipework and vents shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To protect the architectural and historic importance of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.

On drawing no. P06 'Proposed Elevation 1', it shows a new rainwater pipe down the centre of the rear elevation from ground to eaves level.



Although we know the location of the pipe there is no detail of what it would be made of, only that it would match existing which is not sufficient as full details of the location, appearance and finish of all pipework was requested. It is also confusing/contradictory as the blue is meant to be 'existing drainage route' but as seen in the photo in the submitted document, they do not exist.

There are no details of vents at all, but it is not clear if that is actually because none are proposed as that is not specifically stated. The two shower rooms at first and second floor levels would presumably need vents as they would both be internal rooms with no windows and the extraction systems for the cookers in each kitchen would need vents also.

In summary, insufficient details have been submitted of the location, appearance and finish of all pipework and vents and therefore the impact of any pipework and vents on the architectural and historic interest of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area cannot be assessed. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policies TC2 & TC3 (LPFR).

It is therefore considered that condition 8 cannot be discharged.

Condition 9

Prior to the installation of the refuse and recycling storage area, full details of the appearance and size of the refuse and recycling area shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In order to ensure the development is served by a suitable refuse storage area in the interest of amenity and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

The un-numbered 'Proposed Bin Store' drawing shows that the bin storage would be located in the rear yard alongside the northern boundary. It would be a Cedar wheelie bin 4 bay refuse store and would be 2600mm x 1170mm x 860mm in size:



The proposed refuse store would be timber and would be an enclosed space that would conceal the bins. As a freestanding structure for refuse, it is considered acceptable in respect of the setting of this grade II listed building. It would also preserve the character and appearance of the Upper Windmill Street Conservation Area. The proposal would therefore be compliant with Policy CS20 (LPCS) and saved Policies TC2 & TC3 (LPFR).

It is therefore considered that condition 9 could be discharged (which could only be done if all other conditions are acceptable also as split decisions cannot be made).

Conclusion

After an assessment of the submitted information, the details submitted for condition nos. 7 (colour of external walls) and 9 (refuse store) are acceptable to discharge those conditions.

However, unacceptable details have been submitted for condition nos. 3 (Internal Partition Walls), condition 4 (Fire Doors), condition 5 (Secondary Glazing), condition 6 (Fire and Sound Proofing) and condition 8 (Pipework and Ventilation) of planning reference number 20250339 and they cannot be discharged.

The issues are:

Insufficient details have been submitted of all new internal partition walls including plans and sections of the intersections with existing walls/ceilings/cornices/skirting boards. Furthermore, the details show the removal of the dividing wall between the front and back rooms at first floor level and the remaining parts of

the dividing wall between the front and back rooms at second floor level which is not part of Listed Building Consent reference 20250339 and would require Listed Building Consent in its own right. The proposed details would be harmful to the architectural and historic interest of this grade II listed building. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR) and condition 3 of listed building consent reference number 20250339 cannot be discharged.

Insufficient details of the proposed fire doors have been submitted as they are at a scale of 1:20 and in any case the proposed 6 panel doors would not be appropriate for this listed building and would therefore be harmful to its architectural and historic interest. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR) and condition 4 of listed building consent reference number 20250339 cannot be discharged.

Inaccurate details have been submitted of the proposed secondary glazing as the sash window frame of the existing windows have not been drawn accurately and there is therefore a risk of damage to the existing box frame and window architrave if the secondary glazing is not properly installed due to the inaccurate drawing which would be harmful to the architectural and historic interest of this grade II listed building. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR) and condition 5 of listed building consent reference number 20250339 cannot be discharged.

The proposed fire and sound proofing works by virtue of the proposed acoustic ceiling and fire doors would cause harm to the architectural and historic interest of this grade II listed building. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policy TC2 (LPFR) and condition 6 of listed building consent reference number 20250339 cannot be discharged.

Insufficient details have been submitted of the location, appearance and finish of all pipework and vents and therefore the impact of any pipework and vents on the architectural and historic interest of this grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area cannot be assessed. As such the proposal is contrary to Policy CS20 (LPCS) and saved Policies TC2 & TC3 (LPFR) and condition 8 of listed building consent reference number 20250339 cannot be discharged.

Recommendation:

Refusal of details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Richard Hart
Signed:	<i>Rebecca Harrison</i>	Signed:	<i>R Hart</i>
Dated:	8th June 2026	Dated:	9th June 2026