



LONDON OFFICE

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Direct Dial: 020 7973 3635

Our ref: P01563323; L01563331

21st August 2023

Dear Ms Webster

**Arrangements for Handling Heritage Applications Direction 2015
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HERITAGE HOUSE, 79 - 80 HIGH STREET GRAVESEND KENT DA11 0BH
Application Nos 20230567; 20230568**

Thank you for your letters of 18th July 2023 regarding the above applications for planning permission and listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

The submitted information as part of these applications lacks some important detail regarding the heritage significance and conservation needs of these fine Grade II* listed buildings.

We consider that the Heritage Impact Assessment would need to be developed and expanded, as set out in paragraph 194 of the NPPF, and a condition survey, as well as schedule of proposed repair and alterations, produced. These documents are necessary to demonstrate that the scheme has been conceived to preserve the heritage significance of the buildings, minimise harm and address their conservation needs, as requested by paragraph 195 and 199 of the NPPF.

Historic England Advice

Significance of 79-80 High Street

Built in the first half of the 18th century, after the Great Fire of 1727 destroyed much of Gravesend's medieval town, 79 and 80 survive as the oldest buildings on the High Street.



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Falling within the High Street and Queen Street Conservation Area, the buildings lie in the heart of the original settlement between the former landing stage on the River Thames and the Saxon centre of Gravesend to the south.

Developed in a series of stages, the High Street displays a range of architectural styles, building form, details and materials on both frontages. Notwithstanding this, an overall cohesive quality is provided by the tightly knit grain of 18th- to 19th-century tall terraces set along a common building line close to the edge of the pavement with irregular shopfronts on the ground floor. The site's tall weatherboarded frontage, raising to three storeys above a traditionally designed modern shopfront, highly contributes to the streetscape, framing the view towards the Town Pier as a focal point at the bottom of the road.

Although both buildings were internally altered and laterally converted in the 1980s in association with their reuse as retail and offices, they still maintain a strong sense of their original plan form, that reflects the historical domestic typology and function, as well as a number of historical features of interest, including chimney breasts and staircases.

Surviving as key buildings within Gravesend High Street, Nos 70 and 80 are a testament of the growth of the town within the 18th and 19th centuries. Their historic, evidential and aesthetic values are rightly reflected in their individual statutory listing at Grade II*.

Impact of Proposals on the Significance of Relevant Heritage Assets

The proposal is for the conversion of Heritage House from commercial space to a house of multiple occupation, comprising 7 bedrooms for a maximum of 12 residents. An existing external outbuilding would be reconfigured to provide a self-contained apartment with storage area in the basement. The scheme includes repair and refurbishment of historic fabric, as the building has been vacant for several years.

The impact that the proposed works would have on the significance of the listed buildings and conservation area cannot be properly assessed.

This is because the Heritage Impact Assessment produced by DAP in May 2023 is not supported by thorough desk-top and site investigations to offer an understanding of the original layout of the houses, as well as to establish and clearly illustrate which historical components contributing to their significant survive and, therefore, should be preserved.

We also note that this document, as well as the undated Design and Access Statement (rev. B), contains a number of inaccuracies. Notably, the buildings are imprecisely indicated as listed at Grade II and built between 1858 and 1861.

In addition to insufficient and inaccurate information provided by the mentioned planning documents, lack of a detailed schedule of repair and proposed works further prevents a proper assessment of impact on significance to be made.



Relevant Policy and Legislation

The Planning (Listed Building and Conservation Areas) Act 1990 places a duty on local authorities to pay special regard to the desirability of preserving listed buildings, including their setting and any features of special architectural interest they possess (Section 66(1)).

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of sustainable development, where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives: economic, social and environmental.

Section 16 of the Framework sets out how the historic environment should be conserved and enhanced and instructs local planning authorities in paragraph 195 to identify and assess the particular significance of any heritage asset that may be affected by a proposal - including by development affecting their setting - taking account of the available evidence and any necessary expertise. They should take this into consideration when assessing the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 199 states that when considering the impact of a proposed development on a heritage asset, local planning authorities should give great weight to preserving the asset's significance, and the more important the asset, the greater the weight should be. As 79 and 80 High Street are Grade II* listed, and, therefore, among 6% of all listed buildings in the country, their conservation needs to be given the highest priority when considering change.

Any harm or loss to the significance of a designated heritage asset, from its alteration or destruction, or from development within its setting, should require clear and convincing justification (paragraph 200). Where less-than substantial harm would be caused, paragraph 202 explains that this must be weighed against the proposal's public benefits.

Relevant is also paragraph 206 which states that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance.

Historic England Position on the Proposals

Historic England recognises the need to find a sustainable use for the Grade II* listed 79 and 80 High Street in order to secure their long-term conservation and realise their



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potential to contribute towards a thriving town centre, which celebrates Gravesend's unusual and unique heritage.

However, the proposal, as currently devised, raises a number of concerns.

In particular, the information provided in the Heritage Impact Assessment is not sufficient to fully assess the impact of the proposals on the significance of the listed buildings and conservation area, as required by paragraph 194 of the NPPF. In addition, the submission documents do not include a detailed schedule of repair and proposed works to allow for an understanding of the strategy and methodology adopted for preserving any surviving fabric of merit.

We would recommend completing a detailed Heritage Impact Assessment based on desk-top and visual analyses prepared by a suitably qualified conservation professional. This document should analyse the origin and development of the buildings, identify and set out the heritage value of surviving historical components and whether and to what extent the proposals would impact the significance of the designated heritage assets. More information on the content of this document can be found here:
<https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/>

In addition, in order to understand the conservation needs of the buildings, we suggest commissioning a condition survey, accompanied by a detailed schedule of proposed repairs.

Once the significance and conservation needs of Heritage House are fully understood, the applicant should consider whether the current scheme succeeds in sustaining or enhancing its heritage value by preserving historic fabric of merit and reinstating lost historic features. Failing this, the proposal should be reviewed in order to minimise harm to both listed buildings and conservation area, as requested by paragraph 195 of the NPPF.

Recommendation

Historic England has concerns regarding the applications on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 194, 195 and 199 of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.



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Relevant is also section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Luciana Gallo

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