



4th April 2025

Development Control Services
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent DA12 1AU

Listed Building Consent at 20 Stone Street, Gravesend DA11 0NP

Planning, Design and Access Statement

Dear Sir or Madam,

Please find enclosed a Listed Building application relating to the change of use of the upper floors of 20 Stone Street for use as two separate residential units, secured under application reference 20241006 dated 31st December 2024.

An application for Listed Building consent was submitted concurrently and refused on the same date. This proposal presents an amended scheme guided by the advice of Ignus Froneman of Cogent Heritage.

The following sets out the site and planning context, the design considerations and proposal details, a summary of relevant policy and legislation and assessment of the planning and heritage considerations. The proposal is accompanied by a detailed Heritage Statement from Cogent Heritage that appraises the site and provides an assessment of the impacts of the proposals.

The Site

The application site consists of a three storey building forming the end of a terrace of properties within a group listing (Grade II). The original buildings in the terrace (Nos 21, 22 and 23) date back to 1797 and were originally the old workhouse. In 1847 this was converted to



houses and number 20 (application site) and 24 were added to either end. The property is currently in commercial use and occupied by SLC Alarms and CCTV. The ground floor consists of a retail unit with ancillary offices to the rear and above, and a staffroom and storage in the basement storage. Much of the original interior has been stripped out and replaced over time (see photographic survey in Heritage Report).

Externally, the building retains many original features and still has its original butterfly roof, set behind a parapet (Figure 1). The side and rear walls are clad in a Cementous pebbledash which is non-original, unattractive and potentially harmful to the fabric of the building.



Figure 1 – 20 Stone Street located on the left hand side of the terrace

In accordance with the Local Plan Proposals Map the site is within the Upper Windmill Street Conservation Area but under no other designation. It is not within an area of Flood Risk (FZ1). The site is sustainably located within short walking distance to the town centre and 100m from Gravesend Rail Station.



Planning History

The full planning history at the address is listed below:

- 20241006 – Application to determine if prior approval is required for a proposed; change of use of the upper floors for use as 2 x 1bed 1 person residential units (Class C3) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class G – Approved December 2024
- 20241001 - Application for Listed Building Consent for the change of use of the upper floors for use as 2 x 1-bed 1-person residential units – Refused December 2024
- 20190365 - Application for Listed Building Consent for the installation of sign boards to the chimney stacks with LED lighting – Refused June 2019
- 19910583 - Application for Listed Building Consent for forecourt improvements including the erection of 1.8m high railings and the installation of new shop- fronts to nos. 20, 21 & 22 Stone Street and installation of a new internal door at ground floor level between no. 21 & 22 – Approved October 1991
- 19890759 - Application for Listed Building consent for demolition of chimney breast and internal wall on the ground floor – Approved October 1989
- 19871002 - Application for Listed Building Consent for the erection of replacement chimney stacks repairs to part of roof and replacement of glazing bars to nos 21 and 22 stone street – Granted Jan 1983

The Proposal

The application is submitted under Regulation 3 of The Planning (Listed Buildings and Conservation Areas) Regulations 1990. The proposal seeks consent for internal and external alternations to a Grade II Listed building to convert/revert the upper floors of the property to residential use as two separate one-bedroom one-person units. The change of use has been secured under Class G (Schedule 2 Part 3) of the General Permitted Development Order (GPDO). Upon agreement of the extent of the changes to the building an amendment application will be submitted to regularise the plans in the change of use application.



The changes to the building are summarised as follows:

- Removal of the cementitious pebbledash render and replacement with lime render;
- Change of use of the upper floors to residential;
- Replacement of all internal doors (non-original)
- Rewiring throughout;
- Removal of the inserted partitions in the first floor front room;
- Insertion of a kitchen in the first floor front room;
- Insertion of a small bathroom in the first floor rear room;
- Reinstatement of fire place in second floor rear room;
- Insertion of a small bathroom at the second floor rear room, which reinstates the corridor;
- Reinstatement of a wall between the second floor front and rear rooms;
- Reinstatement of a door to the second floor front room, in the original location; and
- Insertion of a kitchen in the second floor front room.

There are no changes proposed to the ground floor and basement. The original partition line between the front and rear of the first and second floors will be retained, which will ensure that the original proportions of the residential property are kept.

A separate access to the residential properties is available at the rear ensuring that new residents do not have to enter the commercial premises to access their flat. There is a retained connection between the ground floor and basement via the rear stair, meaning that this core is shared between the commercial and residential space.

Each unit is over 37sqm and therefore meets the minimum space standard for a one bedroom one person unit. An area has been identified for bin storage in the yard to the rear.

Planning Policy and Legislation

The following policies of the Development Plan are considered relevant to the determination of this proposal:



Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC2 – Listed Buildings
- TC3 – Development Affecting Conservation Areas

The Council undertook a review of its plan in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need.

Other Material Considerations

The Planning (Listed Buildings and Conservation Areas) Act 1990 is of primary importance in considering applications for Listed Building Consent and applications within Conservation Areas. The Council has a statutory requirement under Section 16(2) to have special regard to the desirability of preserving a Listed Building, or its setting, or any features of special architectural or historic interest. Section 72(1) states that with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Chapter 16 of the NPPF sets out how proposals affecting Heritage Assets should be assessed.

Planning Considerations

The key planning considerations relate to the impact of the internal changes on the historic fabric of the Grade II Listed building.

Principle of the change of use

The proposed change of use from Class E (commercial) to C3 (residential) is a permitted change under Class G of the General Permitted Development Order, subject to the prior



approval of the Council. This has been assessed under application 20241006 and it has been determined that prior approval is not required. Nevertheless, the proposed layouts require adjustment in order to preserve features identified as being of historic interest. As such, an amendment application will be required once a Listed Building consent is in place. The change of use to residential would be a reversion to the original use of the property and is regarded as the optimum viable use of the building, thereby being of public benefit in accordance with Paragraph 215 of the NPPF.

Internal Works

The internal works are all necessary in order to secure the optimum viable use of the building. Whilst some of the changes, such as the insertion of the kitchens and bathrooms, would not be consistent with the original layout and use of the building, the overall layout of the floors remains the same and the changes are minor adjustments that can be considered as causing “less than substantial” harm. Furthermore, these matters must be balanced against the enhancements to the layouts through the removal of partitions in the first floor room and reinstatement of a wall between the second floor front and rear rooms. Further enhancements have been identified internally, such as the removal of coverings and reinstatement of fire places.

External Works

The proposed removal of the pebble dash to the side and rear elevations would aesthetically enhance the listed building by replacing an unsightly, inappropriate surface treatment with a more appropriate one. This would also sustain the significance of the listed building, and remove risks to it by replacing an impervious surface treatment with a breathable one. This would also be an enhancement to the Conservation Area.

The reconfiguration of the pipework to the rear is largely hidden from view and would be in cast iron to reflect the historic precedent. This is a commonplace feature that would have a neutral impact on the external appearance of the building.



Windows

As part of the prior approval process a noise assessment was prepared to assess the sites suitability for residential use. The report concluded that the guideline values are currently exceeded but that they could be brought in line by increasing the glazing specification. As the property is listed it was proposed that this be delivered through secondary double glazing. This is recognised within the report provided with the Prior Approval application. Please note that this report is not provided with this application as it is not relevant to the assessment of the Listed building consent. Nevertheless, it is relevant to reference it as during the determination of the previous application (20241001) officers had queried whether it would be necessary to fix the windows shut and to provide trickle ventilation. The noise consultant has confirmed that the values assume all vents are open, which would mean that the required internal noise values could be achieved with the existing traditional latch ventilation for the windows and the secondary glazing vented likewise. This is a common arrangement and would have minimal impact on the historic character of the building. There is no suggestion that the windows would need to be fixed shut in this location.

The assessment of the impact of secondary glazing has been considered by Cogent Heritage as follows: *“This would facilitate the residential conversion and improve the thermal performance of the building, while leaving the significance of the building unaffected. The installation of secondary glazing is neither uncommon where original windows exist, nor is it inherently harmful”.*

Notwithstanding the above, the applicant plans to survey the condition of all of the windows to record the extent of repair required. Should there subsequently be a need to replace any windows, this would be discussed with officers and dealt with via a subsequent Listed Building Consent application.

Other matters

In determining the previous application (20241001) officers also queried whether additional works would be required to meet building regulations and whether mechanical ventilation would be required to meet air quality objectives. The architect has confirmed no additional building regulations requirements at this stage. Should they be identified at a later date (i.e.



during the assessment of Building regulations), a further application for Listed Building consent would of course be submitted. However, it would not be necessary to submit an Air Quality Assessment as part of a Listed Building Consent or a Prior Approval application, so this element can be discounted.

Heritage Statement

The Listing for 20 Stone Street is part of a grouping with 21-24 Stone St. The Listing Notice says:

A small terrace of houses. The core of Nos 21, 22 and 23 was originally the old workhouse erected in 1797. About 1847, it was converted into houses, Nos 20 and 24 added and the back part of the old building pulled down. 3 storeys and basement stuccoed. Parapet and cornice, 11 sashes in all with most glazing bars intact. Mainly moulded surrounds with architraves and cornices and brackets to 1st floor windows. Nos 20-23 have rusticated stuccoed ground floors. No 24 has a modern brick ground floor. Doorcases with rectangular fanlights to Nos 20 and 21. No 20 has a small modern shopfront, No 22 a shopfront and No 23 has a large round-headed arched shopfront with keystone.

As demonstrated in the photographic survey in the Heritage Statement, the interior of the property has been substantially changed and adapted over time to suite the commercial use. Cogent Heritage have been appointed to provide a detailed assessment of the site and the Heritage Impacts of the proposals identified. Please refer to this for further details.

Summary

The proposal will provide two low cost town centre units within 100m of Gravesend Rail Station and will refurbish and restore a heritage asset to its optimal viable use.

Overall, the enhancements to the significance of the building (and the conservation area) would, by far, outweigh the low levels of harm.

Application Submission

In order to complete the application, please find attached the following documentation:

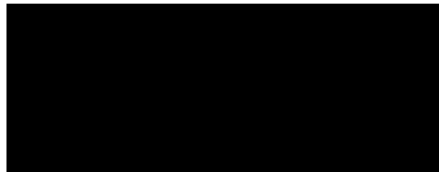


- Completed application forms;
- Design and Access Statement (this letter);
- Heritage Statement;
- Architectural drawings including;
 - Location Plan and Block Plan
 - Existing and Proposed Plan
 - Existing and Proposed Elevations

Additionally, we will arrange payment to Gravesham Council via the Planning Portal.

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,



Ben Kelly MRTPI
Director
07872590069