

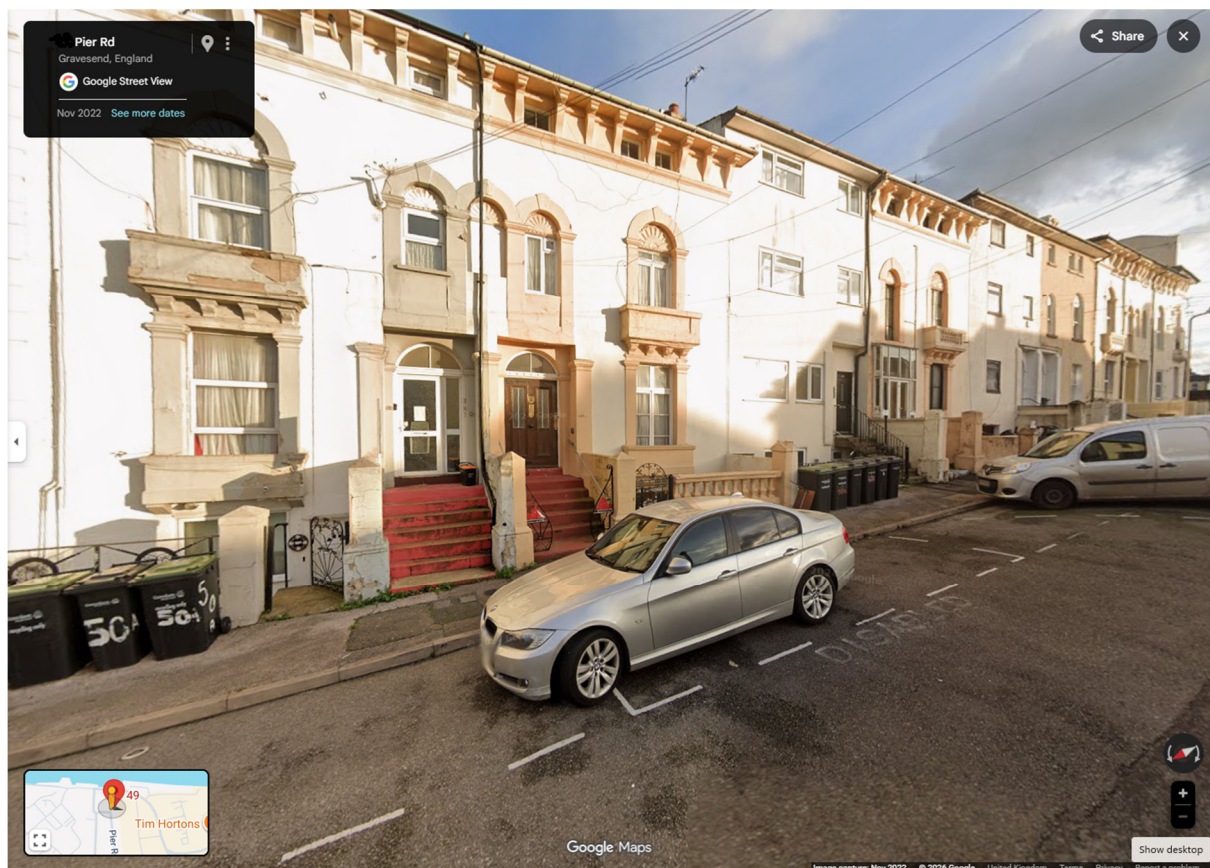
Heritage Statement

Proposal: Change of Use of dwelling to a self-contained one bedroomed flat at basement level, with new bin and bike store in back garden and a seven bed, seven person HMO above and ongoing management plan for those areas.

Address: 49 Pier Road, Northfleet, Gravesend DA11 9NB

Date: 29 January 2026

Produced by: Clare Blanch Wright MA GDip MRTPI



1.0 Introduction

1.1 No. 49 Pier Road lies within the Lansdowne Square Conservation Area and within an Article 4 Direction area. The proposed change of use is principally internal and requires no external alteration to the Pier Road principal elevation or roof form. Any external

maintenance or limited replacement will be undertaken in a manner that conserves the building's external character or, where works fall under Article 4 controls, will be the subject of prior express consent. The proposed rear steps from the basement flat will not be visible to public view and will allow direct, independent access to the shared rear garden – access having previously obtained from within the dwelling and exiting from the rear first floor steps. The submission includes a robust Household Management Plan and Bin Management Statement which respond directly to the Lansdowne Appraisal's concerns about the visual and amenity effects of multiple occupation. On this basis the proposal is considered to preserve the character and appearance of the Conservation Area and as such to be acceptable in heritage terms.

2.0 Heritage assets and policy context

2.1 Heritage asset — The relevant heritage asset is the Lansdowne Square Conservation Area, designated 1995 and extended 2001, to protect the special architectural and historic interest of Rosherville New Town, the Lansdowne villas, the Pier Road terraces and the riverside setting. The Pier Road terrace forms part of the eastern edge of the Conservation Area and contributes to the area's nineteenth-century riverside townscape.

2.2 The Lansdowne Square Conservation Area Appraisal and Management Proposals (Gravesham Borough Council, 2009) defines the special interest, identifies positive townscape features identifies those buildings and features (terraces, balustraded terrace, roofscape and boundaries) which together give the area its special interest and sets out site-specific management priorities.

2.3 Gravesham's Article 4 guidance explains the purpose of Directions (to prevent incremental loss of traditional features) and lists the common categories of work that will require express permission (replacement windows/doors, roof alterations/rooflights, painting/rendering, boundary works, hard surfacing and outbuildings). The Guidance stresses the need to consult the Council where doubt exists and notes that HMOs are automatically subject to such planning controls. The Lansdowne Appraisal itself highlights the harmful effects that sub-division and multiple occupancy can have on streetscape (bins, paraphernalia, unsympathetic replacements).

2.4 Chapter 16 of the NPPF and the Historic Environment section of the Planning Practice Guidance require decision-makers to conserve heritage assets and the character of conservation areas, ensuring proposals preserve or enhance significance.

These documents form the local policy context for this assessment.

3.0 Significance and principal features

3.1 The Appraisal records that the special interest of Lansdowne Square arises from:

- the planned 19th century riverside development (Rosherville New Town);
- the composition and architecture of the Pier Road terrace and the balustraded terrace overlooking the river; and
- the group value and long views to/from the Thames.

3.2 Key features warranting retention at No. 49 include the Pier Road elevation, the roof profile, boundary treatments and the consistent streetscape rhythm which contributes to the area's significance. The Appraisal specifically cites losses from unsympathetic alterations (uPVC windows, loss of cornices, painted/rendered finishes) and the visual clutter associated with multiple occupation as negative issues to be tackled.

4.0 The proposal and assessment of effects

4.1 The proposal regularises an existing internal arrangement: a self-contained ground floor flat and a proposed 7-bed HMO above. No major external changes to the principal Pier Road elevation nor roofline are proposed.

4.2 Direct physical impact — There is no direct harm to the Conservation Area from loss of historic fabric or changes to principal external elevations because the scheme retains the building's external form and principal features.

4.3 Indirect/operational impacts — The Appraisal's primary heritage concern with HMOs is the effect of sub-division on the streetscene — particularly increased bins, storage, meter cupboards, satellite dishes and unrelated paraphernalia and incremental loss of traditional features through unsympathetic replacement. These are management/operational matters rather than issues of archaeology or fabric, but they have real townscape consequences. The applicant mitigates these through the Household Management Plan and the Rubbish / Bin Management Statement which require internal arrangements, bin storage protocols, landlord oversight, cleaning/rota arrangements and tenant obligation. These measures are capable of preventing the principal harms that the Appraisal identifies and so materially reduce the risk of cumulative harm to the streetscape.

4.4 Article 4 implications — Where external works are needed and fall within Article 4 categories (windows/doors, painting/rendering, roofing, boundary works, hard surfaces), the applicant will either execute like-for-like repairs (which the Council accepts) or submit the necessary express planning applications. The applicant acknowledges the Council's Article 4 approach and will comply.

4.5 The proposal is considered to not harm the significance of the Conservation Area: the building's external contribution is retained and operational impacts are addressed by management measures. The change of use is therefore consistent with the duty to "preserve or enhance" the Conservation Area's character.

5.0 Mitigation, enhancement and management

5.1 Conservation-led repairs — Any external repairs will use appropriate traditional materials and details appropriate to the building and the Conservation Area. Where replacement is necessary (e.g. windows/doors) the works will seek to match the original profiles, materials and finishes.

5.2 Management measures — The Household Management Plan includes: tenant behavioural rules, contact details for reporting, cleaning schedules for communal areas, and enforcement (breach of the plan may result in termination). The Bin Management Statement establishes bin storage within the curtilage, a presentation rota, cleaning responsibilities and management

oversight. Together these respond directly to the Appraisal's issues and materially reduce the risk of cumulative harm to the streetscape.

5.3 Future works — If the applicant proposes replacement windows/doors or other works controlled by Article 4, these will be designed to match original forms/Historic profiles and be the subject of formal applications or sample schedules for approval.

6.0 Proposed planning conditions / informatives (windows & repairs)

To secure the conservation-led approach the following **conditions and informatives** are suggested for inclusion in any grant of planning permission. They are drafted so as to be clear and practical for decision-taking:

Condition 1 — External works (windows/doors/repairs)

Notwithstanding the details shown on the approved drawings, none of the following works shall commence until full details, drawings and samples of the proposed external repairs and/or replacements have been submitted to and approved in writing by the Local Planning Authority: replacement windows (elevations at 1:20 and sections at 1:5 or 1:10 showing glazing bars, astragal profiles and mouldings), external doors (including sections), internal/external reveals, lintels, cills, new or replacement rainwater goods, and a schedule of proposed finishes and colours. A sample panel (minimum 1m²) demonstrating the proposed masonry repair and finish shall be provided on site for inspection and approval. The works shall be carried out in accordance with the approved details and retained thereafter.

Reason: To ensure that any external repairs or replacements conserve the character and appearance of the Lansdowne Square Conservation Area and to comply with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy and saved Policy TC3.

Condition 2 — Like-for-like / conservation repairs

Works described within Condition 1 shall be limited to repairs and like-for-like replacements unless otherwise agreed in writing by the Local Planning Authority. For the purposes of this condition “like-for-like” shall mean the same materials, profiles, decorative details, dimensions, glazing pattern and colour/finish as the original feature it replaces.

Reason: To protect surviving historic fabric and the character of the Conservation Area.

Condition 3 — Method statements (masonry/paint/works adjacent to historic fabric)

Where works involve masonry repair, repointing, cleaning or repainting, a method statement shall be submitted and approved in writing prior to works commencing. Repointing shall use lime-based mortars where appropriate and shall match the existing mortar in colour, texture and profile. Cleaning methods shall be non-abrasive and designed to avoid damage to the substrate. Paint colours and finishes shall be agreed in writing prior to application.

Reason: To secure appropriate conservation techniques and prevent accidental damage.

Informative (Article 4 / pre-app)

The applicant is reminded that the Lansdowne Square Conservation Area is subject to an Article 4 Direction which removes certain permitted development rights for family houses and that HMO conversion proposals are subject to local controls. Before undertaking any further external alterations, contact the Council's Conservation Officer to confirm whether express consent is required and to agree appropriate details. See Gravesham Borough Council: Article 4 Direction — A guide for owners and occupiers (April 2020).

(If the Council prefers slightly different wording these conditions can be adapted — for example including explicit scale references for window drawings, samples to be left on site, or a requirement for work to be supervised by an accredited conservation contractor.)

6.0 Conclusion

The proposed internal regularisation to provide a ground floor flat and a proposed 7-bed HMO above is considered to be compatible with the Lansdowne Square Conservation Area's objectives to conserve and enhance historic character. The scheme avoids material change to the building's principal external elevations and roof form and addresses the Appraisal's principal operational concerns about HMOs through a well-constructed Management Plan and Bin/Rubbish Plan. Where external repair or replacement is required the works will be conservation-led and can be secured by condition (sample panels, detailed joinery drawings, method statements and like-for-like repair requirements). On this basis the proposal is considered to preserve the character and appearance of the Conservation Area and to be acceptable in heritage terms.

References

- Lansdowne Square Conservation Area Character Appraisal and Management Proposals, Gravesham Borough Council (2009).
- Article 4 Direction — A guide for owners and occupiers, Gravesham Borough Council (April 2020).
- National Planning Policy Framework December 2025, Chapter 16: Conserving and Enhancing the Historic Environment
- National Planning Practice Guidance: Historic Environment