

Condition Compliance and Response Statement

20 Stone Street, Gravesend, Kent DA11 0NP

**Application for Approval of Conditions 3, 4, 5, 6, 7, 8 and 9 attached to Listed Building Consent
Ref. 20250339**

Response to Delegated Officer Report and Refusal Notice for Application Ref. 20260382

1. Introduction

This statement has been prepared in support of a revised application for the approval of conditions attached to Listed Building Consent Ref. 20250339 for 20 Stone Street, Gravesend.

The previous application, Ref. 20260382, sought approval of details pursuant to Conditions 3, 4, 5, 6, 7, 8 and 9. The application was refused on 9 June 2026. The Delegated Officer Report and Decision Notice identified a number of specific concerns relating primarily to the level of detail submitted, the treatment of historic fabric, the protection of existing cornices and skirtings, the suitability of fire door detailing, the accuracy of secondary glazing details, and the need for clearer information relating to pipework and ventilation.

This statement responds directly to each officer comment and refusal reason. It cross-references the revised condition documents now submitted and explains how each issue has been addressed.

The revised submission confirms that the proposed works remain in accordance with the approved Listed Building Consent Ref. 20250339. No variation to the approved consent is proposed. The revised information has been prepared to demonstrate that the detailed condition submissions are heritage-led, reversible where possible, and designed to avoid harm to the architectural and historic interest of the Grade II listed building.

2. Condition 3 – Internal Partition Walls

2.1 Condition Requirement

Condition 3 requires that, 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 and skirting boards, are submitted to and approved in writing by the Local Planning Authority.

The purpose of the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area.

2.2 Officer Comment / Concern

The Delegated Officer Report identified that the previously submitted information was insufficient because it did not show the full extent of the proposed partition walls or clearly demonstrate how those walls would relate to existing walls, ceilings, cornices and skirting boards.

The report stated that the previous information relied on a generic wall detail and did not adequately demonstrate the junctions with historic fabric. It also noted that the previous drawing annotation suggested there was no existing coving on site, whereas corning was known to survive within the building.

The Decision Notice also stated that insufficient details had been submitted of all new internal partition walls, including plans and sections showing intersections with existing walls, ceilings, cornices and skirting boards.

2.3 Response

The revised Condition 3 submission has been updated to directly address this concern.

The revised document confirms that the proposed internal partitions are lightweight and reversible stud partitions, designed to be independent of historic walls where possible. It also confirms that existing cornice detailing has been identified on site and that the new works are designed so there will be no visual or physical disturbance to existing features. The revised submission specifically confirms:

- Existing cornices are to be retained and exposed.
- Existing skirting boards are to be retained where present.
- New junctions are designed to avoid cutting into original fabric.
- No historic cornices or skirting boards are proposed to be removed.
- No change is proposed to the existing heritage details.
- No change is proposed to the ground floor or basement layout.

The revised Condition 3 document also includes existing photographic evidence of the first and second floor rooms and identifies where cornices and skirtings are present. It references the drawing package “260616_Stone Street_Appendix details” and includes a reference plan identifying retained historic features and areas where cornice and skirting are located.

2.4 How the Issue Has Been Addressed

The officer's concern was that the previous submission did not show how new partitions would meet historic fabric. The revised submission now identifies the relevant historic features and confirms that the new partitions will be designed around them, rather than through them.

The concern regarding loss of cornices has been addressed by confirming that existing cornices will be retained and left exposed.

The concern regarding loss of skirting has been addressed by confirming that skirtings will be retained and that no permanent fixings will be made into retained skirting where this can be avoided.

The concern regarding insufficient project-specific detail has been addressed through the inclusion of a reference plan, existing photographs, and condition-specific drawings.

2.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 3 document.
- Detail package on connection details
- Condition 3 reference plan showing existing cornice, skirting, retained window reveals, retained doorways and retained features.
- Existing site photographs included within the revised Condition 3 submission.

2.6 Conclusion on Condition 3

The revised information directly responds to the previous refusal reason. The submission now provides a clearer heritage-led strategy for the installation of internal partitions and demonstrates that the proposed works will not result in the loss of historic cornices, skirting boards or other retained heritage features.

Condition 3 can therefore be discharged.

3. Condition 4 – Fire Doors

3.1 Condition Requirement

Condition 4 requires that, prior to the installation of any new fire doors, 1:10, 1:2 or 1:1 section drawings showing the door in the wall are submitted to and approved in writing by the Local Planning Authority.

The reason for the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area.

3.2 Officer Comment / Concern

The Delegated Officer Report stated that the previously submitted fire door information did not comply with the condition because the drawings were not provided at the required scale. It also stated that the proposed six-panel doors were not appropriate for the listed building.

The Decision Notice confirmed this as a refusal reason, stating that insufficient fire door details had been submitted and that the proposed six-panel doors would not be appropriate for the listed building.

3.3 Response

The revised Condition 4 submission has been amended to address this concern.

The previous six-panel door approach has been removed. The revised strategy now proposes bespoke timber fire doors designed to match historic panel proportions, specifically using a four-panel door arrangement.

The revised submission confirms that the proposed fire doors will:

- Be bespoke timber fire doors.
- Be designed to match historic panel proportions.
- Use a four-panel door arrangement.
- Be installed within existing openings.
- Avoid enlargement of existing openings.
- Include slimline concealed intumescent strips.
- Include traditional mouldings and architraves, either retained or replicated.
- Include a drop-down seal.
- Be set back within reveals to preserve historic depth.

The revised submission includes photographic evidence of the proposed fire door locations and a four-panel door reference.

3.4 How the Issue Has Been Addressed

The officer's concern regarding the use of six-panel doors has been addressed by replacing the previous approach with a four-panel timber door design, which is more appropriate to the historic character of the listed building.

The concern regarding loss of architectural character has been addressed by confirming that the doors will be installed within existing openings and that no enlargement of the openings is proposed.

The concern regarding the visual impact of modern fire door requirements has been addressed by specifying concealed slimline intumescent strips, drop-down seals and traditional mouldings.

The concern regarding insufficient detailing has been addressed through the revised condition-specific submission and associated scaled drawings.

3.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 4 document.
- Fire door detail drawings contained within the Condition 4 submission.
- Existing photograph of front room fire door location.
- Four-panel historic door reference image.
- Revised door strategy within the Condition 4 compliance details.

3.6 Conclusion on Condition 4

The revised fire door strategy directly addresses the previous refusal reason. The inappropriate six-panel doors have been removed from the proposal and replaced with bespoke four-panel timber fire doors, installed within existing openings and detailed to minimise harm to historic fabric.

Condition 4 can therefore be discharged.

4. Condition 5 – Secondary Glazing

4.1 Condition Requirement

Condition 5 requires that, prior to the installation of any secondary glazing, 1:10, 1:2 or 1:1 details of the secondary glazing and how it fits into the existing window reveals are submitted to and approved in writing by the Local Planning Authority.

The purpose of the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Conservation Area.

4.2 Officer Comment / Concern

The Conservation Officer advised that the secondary glazing system itself would be acceptable, but that the previous detail drawing did not accurately match the existing sash window frame and architrave detail as seen in the Heritage Statement photographs.

The concern was that, because the existing window had not been drawn accurately, there was a risk of damage to the existing box frame and window architrave if the secondary glazing was installed incorrectly.

The Decision Notice also confirmed that inaccurate secondary glazing details were a reason for refusal because of the potential risk of harm to the existing sash window frame, box frame and architrave.

4.3 Response

The revised Condition 5 submission has been updated to clarify how the secondary glazing will be installed within the existing window reveals.

The revised submission confirms that the secondary glazing will:

- Be slim-profile.
- Be internally mounted.
- Be fully reversible.
- Sit in front of the existing sash windows.
- Preserve the original glazing bars.
- Preserve window operation where feasible.
- Be fixed into the outside of the window linings, not into the original frames.
- Use neutral coloured frames, such as off-white.
- Have minimal visual impact from external views.

The revised document also includes existing photographs of the window reveals at first and second floor level, together with a proposed secondary glazing detail. The drawing reference is "260616_Stone Street_Window Detail."

4.4 How the Issue Has Been Addressed

The officer's concern regarding inaccurate existing window detailing has been addressed by including photographic evidence of the existing window reveals and an updated proposed detail showing the secondary glazing in relation to the existing fabric.

The concern regarding potential damage to the historic sash windows has been addressed by confirming that the secondary glazing will not be fixed into the original frames. Instead, it will be fixed into non-heritage window linings.

The concern regarding reversibility has been addressed by confirming that the system is fully reversible.

The concern regarding visual impact has been addressed by confirming that the secondary glazing will be internally mounted, slim-profile and neutral in colour.

4.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 5 document.
- Drawing: 260616_Stone Street_Window Details.
- Existing photographs showing first and second floor window reveals.
- Proposed secondary glazing detail.

4.6 Conclusion on Condition 5

The revised submission addresses the previous concern by clearly showing the relationship between the proposed secondary glazing and the existing window reveals. The installation method avoids fixing into the original sash frames and is reversible.

Condition 5 can therefore be discharged.

5. Condition 6 – Fire and Soundproofing Works

5.1 Condition Requirement

Condition 6 requires that, prior to any fire or soundproofing works, full details of the fire and soundproofing works are submitted to and approved in writing by the Local Planning Authority.

The purpose of the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area.

5.2 Officer Comment / Concern

The Delegated Officer Report stated that the previously proposed acoustic ceiling and fire door details would cause harm to the architectural and historic interest of the listed building.

The key concern was that the proposed dropped ceilings would harm or obscure existing ceiling cornices, which should be retained and remain visible. The report also linked the Condition 6 concern to the Condition 4 concern regarding inappropriate fire door details.

The Decision Notice confirmed that the proposed fire and soundproofing works, by virtue of the proposed acoustic ceiling and fire doors, would cause harm to the architectural and historic interest of the Grade II listed building.

5.3 Response

The revised Condition 6 submission has been updated to adopt a heritage-led fire and acoustic strategy.

The revised submission confirms that:

- Existing ceiling cornices will be retained.
- Existing cornices will remain exposed.
- Soundproofing enhancements can be implemented on the floor of each level rather than through new dropped ceilings, where heritage details would otherwise be affected.
- Where heritage details are at risk, Envirograf intumescent paint can be used as a fire protection measure.
- Only reversible insulation is to be used where possible.
- The strategy avoids damage to existing heritage items.
- Acoustic enhancements are proposed through a floor build-up installed on top of existing floors.

The revised document includes a floor build-up detail for acoustic enhancement and product information for Envirograf Product 105 EP/CP, an intumescent coating suitable for plasterboard, lath-and-plaster ceilings, coving and concrete ceilings/walls.

5.4 How the Issue Has Been Addressed

The officer's concern regarding dropped ceilings has been addressed by amending the strategy so that soundproofing enhancements can be implemented from above, through floor build-ups, rather than through dropped ceilings where cornices would be affected.

The concern regarding concealment or loss of cornices has been addressed by confirming that existing cornices will be retained and left exposed.

The concern regarding fire protection works harming historic fabric has been addressed through the use of less intrusive options, including Envirograf intumescent paint where appropriate.

The concern regarding reversibility has been addressed by confirming that reversible insulation will be used where possible and that the approach is designed to avoid risk of damage to heritage items.

The concern regarding fire doors is addressed separately under Condition 4, where the revised four-panel fire door strategy has replaced the previous six-panel door approach.

5.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 6 document.
 - Floor build-up detail on top of existing floors for acoustic enhancement.
 - Reference plan identifying retained cornices and other heritage features.
 - Envirograf Product 105 EP/CP technical information.
 - Revised Condition 4 fire door submission.
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5.6 Conclusion on Condition 6

The revised fire and soundproofing strategy responds directly to the previous refusal reason. The harmful dropped ceiling approach has been replaced by a strategy that retains and exposes existing cornices, uses floor-based acoustic improvements where possible, and relies on less intrusive fire protection methods where heritage fabric is at risk.

Condition 6 can therefore be discharged.

6. Condition 7 – External Lime Render

6.1 Condition Requirement

Condition 7 requires that, prior to the application of external lime render on the side/gable wall, details of the colour are submitted to and approved in writing by the Local Planning Authority. The purpose of the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Conservation Area.

6.2 Officer Comment / Concern

The Conservation Officer advised that Celtic Sustainables External Lime Render was acceptable, subject to confirmation that the existing pebbledash would be removed before the lime render was applied.

The Delegated Officer Report confirmed that the proposed use of Celtic Sustainables Chalk Lime Render was acceptable and that, because the proposal would replace the existing cementitious pebbledash with breathable lime render, Condition 7 could be discharged.

6.3 Response

The revised Condition 7 submission confirms that the existing pebbledash will be removed before the application of the lime render.

The revised submission specifies:

- Manufacturer: Celtic Sustainables.
- Colour: Chalk Lime Render.
- Existing cementitious pebbledash to be removed.
- Replacement with breathable lime render.
- Traditional chalk colour.
- Muted finish appropriate to the historic terrace character.
- Finish appropriate to the Conservation Area palette.

The revised submission also states that the removal of the pebbledash is an enhancement to significance and that lime render reinstates a more appropriate historic appearance.

6.4 How the Issue Has Been Addressed

The officer's only outstanding point was confirmation that the existing pebbledash would be removed before the new lime render was applied. This is now expressly confirmed in the revised Condition 7 document. The render product and colour previously considered acceptable by the Conservation Officer are retained.

6.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 7 document.
- Celtic Sustainables Chalk Lime Render specification.
- Sample image / product reference.
- Existing photographs.
- Lime render justification statement.

6.6 Conclusion on Condition 7

The revised submission confirms the removal of the existing pebbledash and the use of a breathable chalk-coloured lime render. This directly addresses the Conservation Officer's comment and aligns with the Delegated Officer Report's conclusion that the details are acceptable.

Condition 7 can therefore be discharged.

7. Condition 8 – Pipework and Ventilation Details

7.1 Condition Requirement

Condition 8 requires that, 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 are submitted to and approved in writing by the Local Planning Authority.

The purpose of the condition is to protect the architectural and historic importance of the Grade II listed building and the character and appearance of the Upper Windmill Street Conservation Area.

7.2 Officer Comment / Concern

The Delegated Officer Report stated that the previous submission showed a new rainwater pipe on the rear elevation but did not provide sufficient detail of what it would be made from. It was not considered sufficient to state that the new pipework would “match existing”.

The report also noted that there were no details of vents and that it was unclear whether this was because no vents were proposed or because the details had not been provided. The report specifically noted that the shower rooms and kitchen extraction would presumably require vents.

The Decision Notice confirmed that insufficient details had been submitted of the location, appearance and finish of all pipework and vents, meaning that the impact on the listed building and Conservation Area could not be assessed.

7.3 Response

The revised Condition 8 submission has been updated to provide specific information on both pipework and vents.

For pipework, the revised submission specifies:

- Manufacturer: Alumasc.
- Product: Alumasc Heritage Round Circular Cast Aluminium Socketed Downpipe Eared.
- Finish: Black.

For vents, the revised submission specifies:

- Manufacturer: Black Country Metalworks.
- Product: Black Cast Iron Square Air Brick / Air Vent.
- Finish: Black.
- Size: 100mm x 100mm.

The revised submission confirms that services will be routed internally wherever possible and that external interventions will be minimised. Where external elements are unavoidable, they will be located on rear elevations, use black or dark metal finishes, align with existing features, and avoid fixing into decorative stonework or mouldings.

The revised document includes a rear elevation reference drawing and refers to drawing “20260410_Stone Street_Existing pipe works and vents.”

7.4 How the Issue Has Been Addressed

The concern regarding lack of pipework material information has been addressed by specifying a heritage-style cast aluminium downpipe system in black.

The concern regarding lack of vent information has been addressed by specifying black cast iron square air bricks / vents, including size and appearance.

The concern regarding location has been addressed by showing the rear elevation arrangement and confirming that external pipework and vents will be located on rear elevations where they have lower visibility.

The concern regarding visual impact has been addressed through the use of dark metal finishes, heritage-style materials, and alignment with existing features.

The concern regarding harm to decorative fabric has been addressed by confirming that fixings into decorative stonework or mouldings will be avoided.

7.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 8 document.
- Drawing: 20260410_Stone Street_Existing pipe works and vents.
- West / rear elevation drawing.
- Alumasc Heritage Round Circular Cast Aluminium Downpipe specification.
- Black Country Metalworks cast iron air brick / vent specification.

7.6 Conclusion on Condition 8

The revised submission directly addresses the previous refusal reason by providing clear information on the location, appearance, finish and specification of both pipework and vents. The use of black heritage-style metalwork and rear elevation placement ensures the works will preserve the architectural and historic interest of the listed building and the character and appearance of the Conservation Area.

Condition 8 can therefore be discharged.

8. Condition 9 – Refuse and Recycling Storage

8.1 Condition Requirement

Condition 9 requires that, prior to installation of the refuse and recycling storage area, full details of the appearance and size of the refuse and recycling area are submitted to and approved in writing by the Local Planning Authority.

The purpose of the condition is to ensure that the development is served by a suitable refuse storage area in the interest of amenity.

8.2 Officer Comment / Concern

The Conservation Officer made no objection to Condition 9 and the Delegated Officer Report recorded “Refuse Store, No comment.”

8.3 Response

The revised Condition 9 submission provides additional information to confirm the design approach for the refuse and recycling storage area.

The revised submission confirms that the refuse storage area will:

- Be located to the rear or in a screened side location.
- Be positioned away from the primary frontage.
- Use a timber enclosure or painted metal in muted colours.
- Be simple and unobtrusive in design.
- Be appropriately sized for use without visual over-dominance.
- Include screening, such as fencing or planting where appropriate.

The revised submission also includes a reference to the proposed enclosure style and states that the approach ensures no harm to the setting or streetscape and maintains the visual coherence of the terrace frontage.

8.4 How the Issue Has Been Addressed

Although no objection was raised by the Conservation Officer, the revised submission provides further clarity on appearance, size, materials, location and screening.

This ensures that the refuse and recycling storage area will remain visually discreet and will not harm the setting of the listed building or the wider Conservation Area.

8.5 Relevant Revised Documents / References

- 20 Stone Street – Condition 9 document.
- Refuse and recycling storage layout / enclosure details.
- Reference image for bin store enclosure.
- Materials and screening strategy.

8.6 Conclusion on Condition 9

The revised submission provides sufficient detail of the refuse and recycling storage area and responds to the requirements of the condition. No objection was previously raised and the revised details further demonstrate that the refuse storage arrangement will be suitable and visually unobtrusive.

Condition 9 can therefore be discharged.

9. Overall Summary of Response to Previous Refusal

The revised submission has been prepared to respond directly to the officer comments and refusal reasons identified in the Delegated Officer Report and Decision Notice for Application Ref. 20260382.

The key amendments are summarised as follows:

Condition	Previous Officer Concern	Revised Response
Condition 3	Insufficient detail of new partitions and their relationship with walls, ceilings, cornices and skirtings. Concern regarding removal of dividing walls and harm to historic fabric.	Revised drawings, photographs and reference plans identify retained cornices, skirtings and heritage features. Lightweight reversible partitions proposed. No removal of historic cornices or skirtings. No change to ground floor or basement layout.
Condition 4	Fire door details insufficient and six-panel doors inappropriate.	Revised proposal uses bespoke four-panel timber fire doors, installed within existing openings, with traditional mouldings, concealed intumescent strips and drop-down seals.
Condition 5	Secondary glazing detail inaccurate and risked damage to sash box frame and architrave.	Revised details show installation within existing reveals. Secondary glazing fixed to window linings, not original frames. Slim-profile, reversible and internally mounted system proposed.
Condition 6	Acoustic ceiling and fire protection strategy would harm or conceal cornices.	Dropped ceiling approach avoided where heritage features are affected. Acoustic upgrades proposed through floor build-up. Cornices retained and exposed. Envirograf intumescent coating proposed where appropriate.
Condition 7	Confirmation required that pebbledash would be removed before lime render applied.	Revised document confirms removal of pebbledash and use of Celtic Sustainable Chalk Lime Render.
Condition 8	Insufficient information on pipework and vents, including material, location, finish and appearance.	Revised details specify Alumasc black cast aluminium downpipes and black cast iron air vents. Rear elevation location shown. Internal routing used where possible.
Condition 9	No objection raised.	Further details provided on refuse store appearance, size, screening, location and materials.

10. Final Conclusion

The revised condition documents provide a comprehensive response to the comments raised by the Conservation Officer and Case Officer in relation to Application Ref. 20260382.

The revised submission demonstrates that the detailed design has been amended to protect historic fabric, retain and expose existing cornices, avoid unnecessary intervention into skirtings and window frames, use sympathetic fire door and secondary glazing details, and provide clear specifications for pipework, vents, lime render and refuse storage.

The revised information is consistent with the approved Listed Building Consent Ref. 20250339 and does not seek to vary the approved consent.

On this basis, it is respectfully submitted that Conditions 3, 4, 5, 6, 7, 8 and 9 can now be discharged.