



LONDON OFFICE

Ms Alison Webster
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Direct Dial: 020 7973 3635

Our ref: P01563323; L01563331

20th February 2024

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 letter of 19th February 2024 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Background

Historic England provided written advice on 21st August 2023 to the original planning permission and listed building consent applications for the conversion of Heritage House from commercial space to a house of multiple occupation.

At that time, we considered that the submitted information lacked important detail regarding the heritage significance and conservation needs of these fine Grade II* listed buildings.

We recommended drawing up a detailed Heritage Impact Assessment based on desk-top and visual analyses, prepared by a suitably qualified conservation professional, and producing a condition survey, as well as schedule of proposed repair and alterations. These documents were necessary to demonstrate that the scheme had been conceived to preserve the heritage significance of the buildings, minimise harm and address their conservation needs, as requested by paragraph 201 and 205 of the NPPF (December 2023).



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HistoricEngland.org.uk

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Historic England Advice

Following our recommendations, a new Heritage Impact Assessment has been produced by JF Heritage in January 2024. The document sets out the historical and architectural significance of the heritage assets and clarifies that the buildings' interiors retain notable features of interest, including staircases, fireplaces and timber panelling.

The impact assessment section of the document indicates that the proposed conversion would implicate removal of modern fabric of no merit and minor, reversible modification to the existing layout - which mostly reflects the original planform - in order to accommodate a number of ensembles to the proposed bedrooms at first and second floor level. On this basis, the assessment concludes that the overall impact on significance would be low.

However, lack of more detailed information about the location of surviving wall panelling does not allow for an assessment to be made on the potential harm that the proposed facilities may cause to the significance of the listed buildings. Positioned within existing rooms, the new partitions and fittings may conceal and affect these important features, which contributes to the historical character of the spaces.

In addition, the Applicant has not produced the recommended condition survey and related schedule of proposed repair and alterations, which would have assisted in understanding the full implications of the scheme on surviving fabric of merit.

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 201 and 205 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.

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.



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Your authority should take these representations into account and seek safeguards and 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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