

Gravesend Railway Station

Listed Building Consent
Design, Access and Heritage Statement

Network Rail Infrastructure Limited

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Quality information

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Table of Contents

1.	Background	1
2.	The Proposed Works	3
3.	Site Description	5
3.1	Station Description	5
3.2	Platform 2	5
4.	Historic Background to Gravesend Railway Station	8
4.1	History of Gravesend Railway Station	8
5.	Planning History	10
6.	Planning Policy Context.....	11
6.1	Legislation.....	11
6.2	Planning Policy	11
7.	Heritage Assessment.....	14
7.1	Statement of Significance	14
7.2	Assessment of Heritage Impact	15
7.3	Planning Policy Assessment	17
8.	Conclusion.....	18

1. Background

- 1.1 This document has been prepared by AECOM on behalf of Network Rail Infrastructure Limited (NR) in support of an application for Listed Building Consent (LBC) submitted to Gravesham Borough Council (GBC). The application is for the replacement of glazing and timber framework support structure ('the proposal') to a section of canopy on Platform 2 to Gravesend Railway Station ('the station'), Gravesend, Kent, DA11 0HP.
- 1.2 The station has two main entrance buildings north and south of the railway which are separately listed (Grade II) by Historic England; Gravesend Railway Station (Upside), Rathmore Road (List Entry No. 1057649) and Gravesend Railway Station (Downside), Clive Road (List Entry No. 1341495). This application relates to the latter structure.
- 1.3 The entrance to the station from Clive Road provides direct access to Platform 2 which is partially covered by a weather canopy. The canopy comprises iron columns and a support substructure, with Georgian wired glass and timber boarding roof covering, finished with timber daggerboards. The canopy includes a hipped roof glazed section directly over the access between the entrance building and the platform area (see Figure 4 below). This section is currently in poor condition, with many areas of the supporting timber structure and timber glazing bars severely rotten and beyond repair; multiple glazing panels are also cracked or otherwise damaged.
- 1.4 Following a visual inspection and safety assessment, the structure was deemed unsafe due to the main supports and damaged glazing panels being exposed to the elements, thus at risk of collapse. The glazing and supporting timber structure were therefore removed by NR in September 2023 to address the public safety risk for passengers and the operation of the railway. The area underneath the canopy is currently open to the weather and this proposal is therefore a priority for NR for repairs and refurbishment. These will ensure the canopies are covered and watertight to provide a safe and enhanced area for passenger use. The works would also ensure that the special interest of the historic station building is conserved.
- 1.5 NR contacted GBC in September 2023 to advise of the urgent need to remove the glazing and timber framework. GBC advised that anything but emergency works would require listed building consent with 'like for like' being the most appropriate approach in this instance. On behalf of NR, AECOM provided a further update on 7th November 2023 highlighting the wider context, including the need for the works and details of the proposal. GBC responded on 9th November 2023 with advice regarding the timber glazing bars and Georgian wired glass, which confirmed an alternative glazing product may be acceptable. AECOM subsequently responded on behalf of NR to confirm that timber glazing bars would be used instead of metal. A timber support structure, painted white to match the pre-existing timberwork, would also be used. Finally, additional justification for the proposed use of Plasiac polycarbonate to replace the Georgian wired glazing was provided. Further details of the proposals are provided in Section 2.
- 1.6 The purpose of this Design, Access and Heritage Statement is to set out the case for the selected approach to assist GBC in the determination of the LBC application. This statement provides an assessment of the significance of the canopy of Platform 2 as a part of a Grade II listed structure and assesses the impact of the replacement glazing and the supporting timber structure on the listed building. It demonstrates that the proposals are compliant with relevant planning policies and heritage considerations.
- 1.7 This statement should be read in conjunction with the following drawings and supporting material also submitted as part of the LBC application:
 - Existing Site Photos;
 - Plasiac Glazing Product Specification Brochure;
 - Proposed Planning Drawings-
 - Site Location Plan and Block Plan, Drawing no. 521-041-D001, P01;
 - Block Plan Showing Location of Proposed Canopy Works, Drawing no. 521-041-D002, P01;

- Existing Canopy Level Plan and Elevations, Drawing no. 521-041-D003, P01;
- Proposed Canopy Level Plan and Elevations, Drawing no. 521-041-D004, P01; and
- Proposed Glazing Details, Drawing no. 521-041-D005, P01.

2. The Proposed Works

- 2.1 The Proposal is for repair and refurbishment works to the three-bay glazed canopy roof on Platform 2 and associated works comprising:
- Replacement of the existing glazing, comprising Georgian wired obscured glazing panels roof with new polycarbonate glazing of 6mm thick obscured Georgian wired Plasiac;
 - Replacement glazing capping, lead flashings and new timber glazing bars proposed to match the existing features;
 - Replacement of the existing timber canopy substructure with a like for like timber replacement.
- 2.2 The brickwork parapet, solid roof including timber boarding and timber daggerboards supporting the existing canopy structures will remain unaffected by the proposal. Likewise, the existing cast iron columns and cast-iron spandrels forming decorative features along the south elevation of the station will also remain unaffected by the proposal.
- 2.3 As outlined in Section 1.1.3 above, the existing glazing panels have been removed for safety reasons, leaving the roof canopy on Platform 2 currently exposed and open. As such, there is very limited shelter for passengers on the downside of the railway line. This will be remedied by this proposal.
- 2.4 The existing Georgian wired obscured glazing panels have been removed but are not suitable for reuse due to the cracks and damage noted previously.
- 2.5 The existing glazing is proposed to be replaced with new glazing consisting of 6mm thick Plasiac obscured wired polycarbonate panels as shown on the left-hand side of Figure 1. Plasiac is a solid polycarbonate with the main purpose of providing a safe alternative to Georgian wire glass. Plasiac has a number of benefits in terms of procurement lead times and cost effectiveness. However, most importantly, it meets fire safety regulations and is approved by NR Fire Safety. The Plasiac is lightweight and more durable than glass, being virtually unbreakable, and is hence easier and safer to work with.

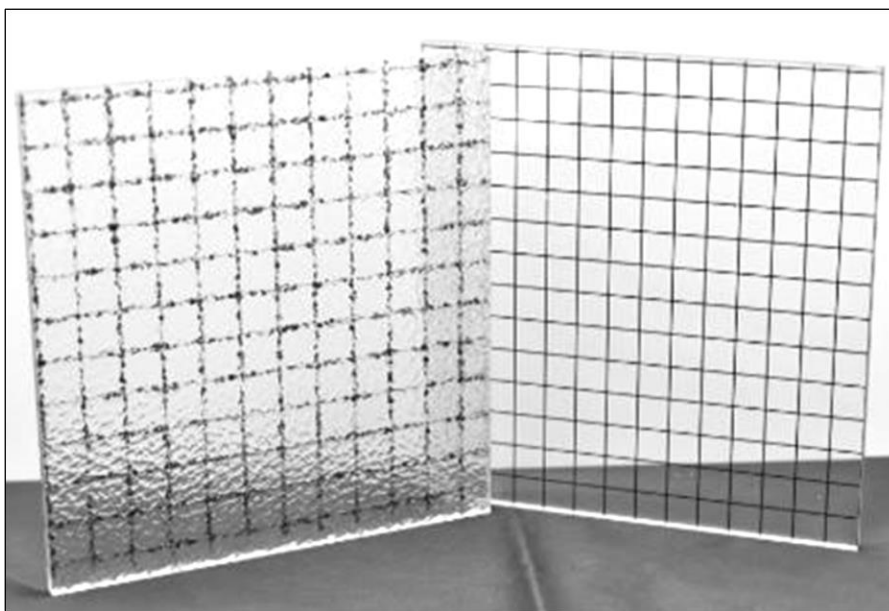


Figure 1: Plasiac wired glazing (obscured glazing option on left hand side)

- 2.6 The location of the roof canopy and extent of the refurbishment works to Platform 2 is shown within the red line boundary in Figure 3. The area of works is shown on the Proposed Canopy Level Plan and Elevations, Drawing no 521-041-D004, P01 illustrated below to indicate the location of the proposal in the broader context of the station.

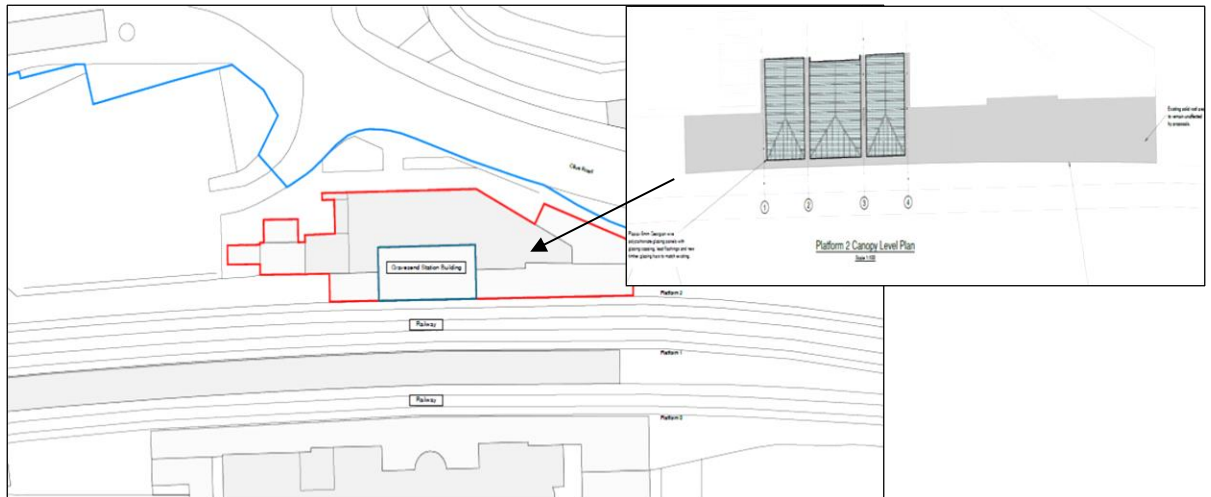


Figure 2 – Proposed Block Plan (left) and Proposed Canopy Level Plan (right) (Drawing no 521-041-D004, P01)



Figure 3: Area of glazing removed from Platform 2 canopy

3. Site Description

3.1 Station Description

- 3.1.1 Gravesend Railway Station serves the town of Gravesend in north Kent. Local train services are operated by Southeastern and Thameslink running on the North Kent Line and High Speed 1. There are statutory listings for two station buildings dating from July 1975 for the 'upside' (towards London) and 'downside' (away from London), both designated as Grade II listed.
- 3.1.2 This application relates to the downside building (Platform 2) where Historic England's listed building entry states the following:
- *"Mid C19. 1 storey brick. Hipped slate roof and cornice. 5 sashes with glazing bars intact. To the left is an extension of 1 storey with a colonnade of 4 cast iron columns and 2 further sashes."*
- 3.1.3 The Station has two main frontages, one on each side of the railway line. Access is from Clive Road to the north and Rathmore Road to the south. The station is surrounded by a mixture of residential uses to the south and the town centre, with various commercial uses, to the north.
- 3.1.4 On the northern side ('downside'), facing Clive Road, is a single storey building on Platform 2 housing a ticket hall, ticket office, general storerooms, passenger gates and a staircase leading to the footbridge across the tracks. On the southern side ('upside'), facing Rathmore Road, is a two-storey building on Platform 1 housing a larger ticket hall, ticket office, retail facilities, passenger gates and access to a separate staircase leading to the footbridge across the tracks.
- 3.1.5 A bus stop, set down areas and public car parking are located to the north of the station on Clive Road and staff parking and additional set down areas to the south of the station on Rathmore Road.
- 3.1.6 This application specifically relates to the roof canopy of the Platform 2 building as discussed in Section 3.2 below.

3.2 Platform 2

- 3.2.2 The station building on Platform 2 is a single storey yellow brick structure with a hipped slate roof and corning. The northern elevation facing towards Clive Road comprises five sash windows with glazing bars intact and the main station entrance. The building has been extended to the east to include a colonnade of four cast iron columns and two further sash windows with a covered cycle parking area to the west of the station building.
- 3.2.3 Platform 2 has a roof canopy with glazed panels alongside a solid flat roof extending at either end of the canopy for the length of the building, supported by cast iron columns and spandrels. The canopy also features timber daggerboards which perform the important function of carrying run-off rainwater away from the canopy structure, as well as improving ventilation. The details are shown on the elevation drawings which form part of the application.
- 3.2.4 The roof canopy is currently open and exposed to the elements as a result of the existing Georgian-wired canopy glazing panels (some of which are damaged) and timber glazing bars being removed for safety reason due to their poor condition. They are beyond repair and not suitable for reuse as shown in Figures 4, 5 and 6.



Figure 4: Underside of canopy showing routed edges to timber



Figure 5: Rotten timber glazing bars of platform 2 canopy



Figure 6: Exposed Platform 2 canopy

4. Historic Background to Gravesend Railway Station

4.1 History of Gravesend Railway Station

- 4.1.1 The station was completed in 1849 for the South Eastern Railway (SER). It was designed by Samuel Beazley and constructed in yellow brickwork and frescoes with stone linings. Figure 7 shows the station layout in 1855.

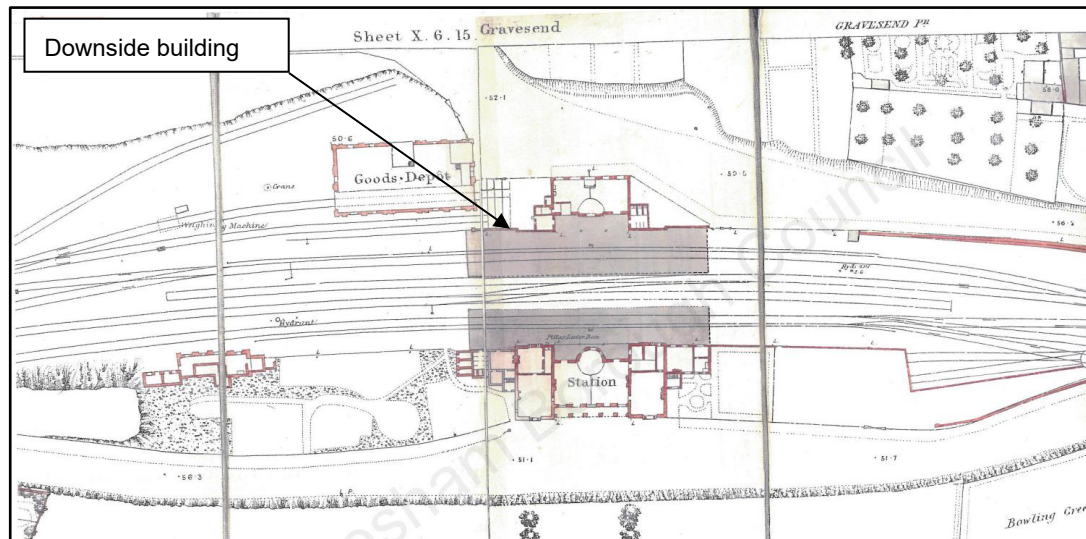


Figure 7: Ordnance Survey Map 1855 Station Survey

- 4.1.2 Significant changes were made to the station when it became a part of the South Eastern & Chatham Railway (SE&CR). These started in 1899 when the name of the station changed from Gravesend (SER) to Gravesend Central, and the ex-London Chatham & Dover Railway (LCDR) terminus became Gravesend West Street. In 1904 the SE&CR undertook modernisations and partial rebuilds of its stations.
- 4.1.3 The modernisation programme included the removal of two train sheds roofs and the conversion of the two central sidings into through running lines. Single-storey yellow-brick extensions were made to the east and west elevations of the upside station building and canopies were introduced on both platforms. It was during these works that the existing 32-metre-long roofed lattice footbridge was added between the platforms. Some of these changes are shown on the Ordnance Survey Map of the station in 1899 (Figure 8).



Figure 8: Ordnance Survey Map dating to 1899 showing the development of the station.

- 4.1.4 The Southern Railway (SR) ownership from 1923 onwards saw further alterations, including the closure of the smaller signal box to the east end of the station and the electrification of ex-SE&CR suburban lines. The latter project was completed at Gravesend by July 1930.
- 4.1.5 The closure of the Allhallows spur by British Railways on 3rd December 1961 saw the withdrawal of all passenger shuttles from Gravesend to the Hoo Peninsula. Steam traction was also removed with the closure of the station's goods yard. The termination of steam services saw the removal of the water tank, but the supporting brick base was retained and subsequently given a flat tarmac-covered roof.
- 4.1.6 Since then, there have been a number of further changes at the station, including the decommissioning of the signal box in 1971 and the demolition of the redundant goods shed. The former goods yard site is now used for car parking. In 1983 an extensive refurbishment tidied up the brickwork and restored the platform canopies.
- 4.1.7 The summary above shows the numerous changes to the station over more than 170 years as technology and engineering has evolved to improve rail services. At the same time, facilities have been adjusted to meet passenger needs.

5. Planning History

5.1.1 There is an extensive planning history for the station including numerous listed building consents, works and alterations. Those relevant to the Proposal are listed in the table below.

Table 1: Relevant Planning History

Application Reference	Description	Status
19840570	Application for Listed Building Consent for internal alterations to the upside and downside station buildings.	Permitted 26/10/1984
20070092	Application for Listed Building Consent for installation of automatic ticket gates and ancillary equipment in Clive Road and Rathmore Road booking halls.	Permitted 13/03/2007
20080307	Application for Listed Building Consent for the attachment of various replacement signs in various locations around Gravesend Railway Station including Clive Road frontage, Clive Road ticket hall, Rathmore Road frontage, Rathmore Road ticket hall, wall junction with Rathmore Road / Stone Street, wall junction with Stone Street / Clive Road, platform 1 and platform 2.	Permitted 06/06/2008
20100689	Application for Listed Building Consent for internal and external alterations in connection with the refurbishment and upgrading of the station including alterations to the existing doors, windows, and ticket office.	Permitted 27/10/2010
20110826	Application for Listed Building Consent for internal and external alterations in connection with the refurbishment and upgrading of the station including alterations to existing doors, windows and ticket office and installation of new lighting and electrical equipment throughout the station and approval of unauthorised works already carried out.	Permitted 22/12/2011
20110852	Application for Listed Building Consent for demolition of the existing footbridge and construction of a new footbridge with lifts and staircases to each platform together with construction of a new central island platform with canopy and demolition of the water tower building on platform 1.	Permitted 20/04/2012
20110865	Application for the prior approval of the siting and design of the new footbridge with stairs and lift together with a new central platform and extension of existing platforms following demolition of existing footbridge and water tower.	Permitted 20/04/2012
20211242	Application for Listed Building Consent for the installation of a train information display on platform 2.	Permitted 08/02/2022

6. Planning Policy Context

6.1 Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.1.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) sets out the principal statutory provisions that must be considered in the determination of any application affecting listed buildings and conservation areas.
- 6.1.2 Section 66 of the Act states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. By virtue of Section 1(5) of the Act, a listed building includes any object or structure within its curtilage.

6.2 Planning Policy

National Planning Policy Framework (December 2023)

- 6.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied to contribute to the achievement of sustainable development. Section 16 of the NPPF *Conserving and enhancing the historic environment requires development to make provision for the conservation and enhancement of the historic environment*.
- 6.2.2 The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development proposal. Significance is defined in Annex 2 as 'the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'. The setting of a heritage asset is defined in Annex 2 as 'the surroundings in which a heritage asset is experienced'.
- 6.2.3 In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance (paragraph 194). Similarly, there is a requirement for local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal; and that they should take this assessment into account when considering the impact of a proposal on a heritage asset (paragraph 195).
- 6.2.4 A clear link is drawn in the NPPF between the importance of the asset and the weight that should be placed on its conservation (paragraph 205). Any harm to, or loss of, a designated heritage asset requires clear and convincing justification. Development that will result in substantial harm to or the loss of a Grade II listed building should be exceptional (paragraph 206).
- 6.2.5 The NPPF recognises that a balance needs to be struck between the preservation of the significance of a heritage asset and delivering public benefit. It therefore sets out considerations to be taken into account when determining a planning application which would result in substantial harm or total loss of significance of a designated heritage asset. It states that the local planning authority (LPA) should weigh the public benefits of the proposed development against any harm, and in cases where it cannot be demonstrated that substantial harm or total loss is not outweighed by the public benefit, it directs the LPA to refuse consent (paragraphs 207-208).

Planning Practice Guidance (2021)

- 6.2.6 The Planning Practice Guidance (PPG) provides further advice and guidance that expands the policy outlined in the NPPF. It expands on terms such as 'significance' and its importance in decision making. The PPG clarifies that being able to properly assess the nature, extent, and the importance of the significance of the heritage asset and the contribution of its setting is very important to understanding the potential impact and acceptability of development proposals (Paragraph: 007 Reference ID: 18a-007-20190723 Revision date: 23 07 2019).
- 6.2.7 The PPG discusses how to assess if there is substantial harm. It states that what matters in assessing if a proposal causes substantial harm is the impact on the significance of the asset. It is the degree of harm to the asset's significance, rather than the scale of the development, that is to be assessed (Paragraph: 018 Reference ID: 18a-018-20190723 Revision date: 23 07 2019).
- 6.2.8 The NPPF indicates that the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the proposed development and should be of a nature and scale to be of benefit to the public, not just a private benefit, and would include securing the optimum viable use of an asset in support of its long-term conservation (Paragraph: 020 Reference ID: 18a-020-20190723 Revision date: 23 07 2019).

Gravesham Local Plan Core Strategy (2014)

- **Policy CS20:** Heritage and the Historic Environment accords a high priority towards the preservation, protection and enhancement of the historic environment, stating that *"Particular attention in this regard will be focussed on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present"*.

Gravesham Local Plan First Review Saved and Deleted Policies (Version 2014)

- 6.2.9 Gravesham Local Plan First Review (1994) was replaced by the adopted Local Plan Core Strategy (2014). The following saved policies of the Gravesham Local Plan First Review (2014) are relevant to the proposal:
- **Policy TC2 Listed Buildings:** this policy states that in the case of applications for alterations to listed buildings, GBC's primary consideration will be the maintenance of the integrity of the original listed building. Proposals will also need to be sympathetic to the listed building in terms of massing, scale, appearance, and materials.

6.3 Guidance

Historic England Guidance

- 6.3.1 Historic England has published a series of Good Practice Advice (GPA) notes. Those of most relevance to this appraisal are GPA2 - Managing Significance in Decision-taking (March 2015), GPA3 - The Setting of Heritage Assets (2nd Edition) (December 2017), and Advice Note 12, Statements of Heritage Significance (October 2019).
- 6.3.2 GPA2 (Historic England 2015a) emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the *'first step for all applicants is to understand the significance of any affected heritage asset and, if relevant the contribution of its setting to its significance'* (paragraph 4). Early knowledge of this information is also useful to an LPA in pre-application engagement with an applicant and ultimately in decision making (paragraph 7).
- 6.3.3 GPA3 (Historic England 2017) provides advice on the setting of heritage assets. Setting is as defined in the NPPF and comprises the surroundings in which a heritage asset is experienced. Elements of a setting can make positive or negative contributions to the significance of an asset and affect the ways in which it is experienced. Historic England state that setting does not have a boundary and what comprises an asset's setting may change as the asset and its surroundings evolve. Setting can be extensive and particularly in urban areas or extensive landscapes can overlap with other assets. The contribution of setting to the significance of an asset is often expressed by reference to views, and the GPA, in paragraph 11, identifies views such as those that were designed or intended to contribute to understanding the significance of assets.
- 6.3.4 Advice Note 12 (Historic England 2019a) outlines a recommended approach to assessing the significance of heritage assets in line with the requirements of NPPF. It includes a suggested reporting structure for a 'Statement of Heritage Significance', as well as guidance on creating a statement that is proportionate to the asset's significance and the potential degree of impact of a proposed development. The Advice Note also offers an interpretation of the various forms of heritage interest that an asset can possess, based on the terms provided in the NPPF Glossary (Annex 2: Glossary); namely archaeological, architectural, artistic, and historic.

7. Heritage Assessment

7.1 Statement of Significance

7.1.1 The following assessment of heritage significance follows the definitions of heritage interests presented in the NPPF Glossary (Annex 2). This defines four core heritage interests:

- Archaeological interest – Holds or has the potential to hold evidence of past human activity worthy of expert investigation at some point.
- Historical interest – Derived from past lives and events. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity derived from the ways in which past people, events and aspects of life can be connected through a place to the present.
- Architectural interest – Derived from the art or science of the design, construction, craftsmanship and decoration of buildings and structure of all types. This can arise from conscious design or fortuitously from the way the heritage asset has evolved.
- Artistic interest – Derived from human creative skills.

7.1.2 Gravesend Railway Station (downside building) was listed in July 1975. The reasons for listing are not provided in the listed building entry. Additionally, the listed building description¹ does not refer to the platform canopy, rather confining itself to the part of the building visible when viewed from Clive Road. This does not mean, however, that the platform canopy does not have heritage value.

7.1.3 The station derives its significance from its architectural and historical interest as a mid-19th century station on the SER. The upside and downside station buildings were designed as a pair and the plan in Figure 7 demonstrates that they were, to a degree, mirror images of each other when viewed from the platform. It appears that the street frontage of the upside platform building was intended to be the main entrance to the station. This lineside symmetry was retained in the late-19th century redevelopment of the station that led to the addition of the hipped-roof glazed canopies to the central three bays of both buildings that form the focus of this assessment. However, the Ordnance Survey Map of 1899 (Figure 8) demonstrates that the symmetry of the paired structures was significantly affected by the late-19th century additions to both buildings, and these differences remain today.

7.1.4 The planning history demonstrates that there have been significant changes to the station over time, including a new central platform and footbridge which are of a modern style as well as more minor works to doors, windows, the ticket offices, ticket barriers, and display boards. On this basis, it can be concluded that there has been a substantial amount of change over the years and the listed building has been altered compared to its original form. This has particularly affected the symmetry between the two station buildings which was part of the original design intention.

¹ Mid C19. 1 storey brick. Hipped slate roof and cornice. 5 sashes with glazing bars intact. To the left is an extension of 1 storey with a colonnade of 4 cast iron columns and 2 further sashes.

7.2 Assessment of Heritage Impact

- 7.2.1 The Proposal includes repairs and alterations to the hipped-roof glazed canopy on the downside station building that seeks to match and respect existing features as closely as possible. The proposal will allow Network Rail to continue to operate a safe, efficient railway whilst also preserving the historic interest and improving the appearance of the building and station generally.
- 7.2.2 The Proposal will replace the glazing system and the supporting timber frame. The existing Georgian wired glazing will be replaced with obscured wired Plasiac and the timber frame is to be a like for like replacement to match the existing timber frame. The rest of the existing station building, including brickwork and timber daggerboards, will remain unaffected by the proposal.

Replacement Canopy Glazing

- 7.2.3 The existing Georgian wired obscured glazing panels within the canopy on Platform 2 have been removed due to the safety risk of the canopy collapsing. Plasiac polycarbonate panels are well-recognised as a suitable replacement over traditional glazing, even on listed buildings. It is often used as an alternative to Georgian wired glass on station platforms as it is durable and lightweight when compared to traditional glass, being virtually unbreakable. This product provides improved safety performance and maintenance, while retaining the visual aesthetic of the Georgian wired panels. The Plasiac wire product brochure submitted as part of this application provides further details on the specifications.
- 7.2.4 Obscured wired Plasiac has been selected due to its compatibility with the Georgian wired glazing and would closely match the existing glazing which has been removed (shown in Figure 9 below). The difference in appearance when viewed from platform level would be indistinguishable, and hence would maintain the visual characteristics of the canopy roof.



Figure 9: Previous Georgian obscured wired glazing

- 7.2.5 Network Rail has successfully replaced older glass with Plasiac glazing at other listed stations. This includes the Grade II listed Eastbourne, and Box Hill & Westhumble stations (Figure 10) where in both cases clear Plasiac was used, and Edenbridge Town Station where obscured Plasiac was used (Figure 11).



Figure 10: Examples of Plasiac glazing used at listed stations (Eastbourne and Box Hill & Westhumble)



Figure 11: Obscured Plasiac glazing used at Edenbridge Town Station

- 7.2.6 Plasiac glazing is therefore visually comparable to the existing glazing, meaning it can be integrated into the canopy roof without compromising the architectural interest of the station building. The appearance of the glazed canopy will continue to reflect the appearance of the paired glazed canopy on the upside building, albeit with renewed timber framing. This consistency is considered important due to the identified symmetry between the buildings when viewed from the platform. As Plasiac is more durable, the canopy structure longevity will increase, as will the safety risks to passengers and railway operations in the longer-term. In summary, Plasiac glazing is considered to be an appropriate material in responding to the practical and operational requirements of the railway station whilst maintaining the integrity and heritage values of the original listed building.
- 7.2.7 In addition to the glazing, the existing lead flashings joining the canopy to the station building will be replaced with new lead flashings, ensuring that the existing appearance is retained. Listed Building

Consent would not be required for these works. However, they have been included for information as they form part of the wider works.

Timber Structure

- 7.2.8 As demonstrated above, the majority of the timber substructure is beyond repair and requires replacement to support the new canopy glazing. The replacement substructure will be timber to match the existing as closely as possible, including in terms of paint colour and routed edges on the underside of the canopy. This like for like replacement would not detract from the architectural interest of the building. Listed Building Consent would not be required for these works. However, they have been included for information as they form part of the wider works.

Conclusion

- 7.2.9 Overall, the design and material changes to the roof canopy will not detract from the architectural interest of the station building, as they seek to replace existing features and finishes as closely as possible by using the most appropriate materials. These materials will also facilitate the future maintenance of the station building.

7.3 Planning Policy Assessment

- 7.3.1 Following a review of the planning policy framework in Section 6.2, national and local policy seeks to ensure the preservation and conservation of heritage assets by ensuring proposals do not detract from or impact on the integrity of listed buildings.

National Planning Policy

- 7.3.2 Paragraph 205 of the NPPF requires great weight to be given to the conservation of a designated heritage asset when considering the impact of a proposed development on its significance. The greater the asset's significance the greater the weight should be. While the proposal uses modern glazing materials, it preserves the asset's significance while minimising harm as set out on Section 7.2 above.
- 7.3.3 Whilst the Proposal seeks replacement materials as close to the existing as possible, there will be removal of historic fabric and a small visual change in appearance to the Platform 2 canopy, resulting in less than substantial harm to the listed building, as defined by the NPPF.
- 7.3.4 Paragraph 206 of the NPPF states that where a proposal leads to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimal viable use consistent with their conservation and ensuring the long-term use of the heritage asset. The following aspirations and public benefits are of relevance to this proposal.
- The proposal repairs and refurbishes the platform canopy and supports the continued use of Platform 2 for its original purpose, allowing for the continued long-term future enjoyment of this part of the listed station by users of the railway. This ensures a viable use of the station consistent with its conservation.
 - The replacement of existing features with low-maintenance materials will help to meet the needs of users for the present and foreseeable future consistent with its long-term conservation, and will visually enhance the platform canopy compared to its current state of disrepair. This results in a positive contribution to the station building's character and distinctiveness.
 - The replacement of damaged and missing features will improve safety for station users and contribute to the operation of the railway, preventing interruption to trains caused, for example, by parts of the damaged platform canopy falling onto the railway.
- 7.3.5 The works are necessary for the operation of the station. Public benefits form part of the balancing and justification for the Proposal and should be considered in determining the application for listed building consent. This is considered alongside the importance of the heritage asset and its conservation, in which it is concluded that there will be less than substantial harm as outlined in the preceding assessment.

Local Planning Policy

- 7.3.6 Policy CS20 of the Gravesham Local Plan Core Strategy (2014) highlights the need to prioritise heritage assets most at risk through neglect, decay or other threats and to ensure that 'viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present'. The proposal seeks to repair the roof canopy and glazing system which is in a state of disrepair and prior to its removal, was a threat to passenger and operational safety at Gravesend Station.
- 7.3.7 As demonstrated in the assessment in Section 7.2, the proposed glazing product will closely match the existing material and will be supported by a timber structure to replicate the existing canopy roof design and will therefore be sympathetic to maintaining the integrity of the listed building in accordance with Policy TC2 of the Gravesham Local Plan (2014).

Conclusion

- 7.3.8 Overall, detailed consideration has been given to conserving the heritage assets. When considering the degree of harm caused and weighing this against the public benefits of the proposal, the proposal complies with national and local planning policy.

8. Conclusion

- 8.1.1 The Proposal presented in this statement demonstrates a knowledge and understanding of the significance of the heritage asset and sets out the steps taken to minimise harm to their significance whilst achieving the project aims. The planning history demonstrates that the heritage asset has needed numerous alterations and developments over the years. This statement has assessed the potential impacts and the benefits of the application on that basis.
- 8.1.2 As set out in Section 7, it is considered that the Proposal would result in less than substantial harm to the listed station building and when assessed against the NPPF (paragraph 208), there are multiple public benefits that outweigh the minor harm caused to the heritage asset. This proposal will also ensure the safe and viable long-term use of the station whilst preserving the character and architectural interest of the listed building.
- 8.1.3 The proposal will result in minor, sympathetic changes to a discrete part of the station building when considering the listed status of the building as a whole, and therefore complies with Local Plan policies. Further to this, the proposal will allow Network Rail to continue to operate a safe, efficient railway whilst also improving the appearance of the building and conserving a heritage asset in a manner appropriate to its significance.
- 8.1.4 For reasons set out in the preceding assessment, it has been demonstrated that the proposal is compliant with planning policy at a local and national level and would maintain the architectural interest of the station building.

