
OUR REF: JB/3337

HERITAGE, DESIGN, ACCESS AND PLANNING STATEMENT

**PLANNING APPLICATION AND LISTED BUILDING CONSENT APPLICATION
(PART RETROSPECTIVE) FOR THE CONVERSION OF SINGLE
DWELLINGHOUSE (C3) TO OFFICE (E(G)(I)) USE, TO INCLUDE INTERNAL
ALTERATIONS, INCLUDING REPLACEMENT OF 2 DOORS, ADDITION OF
NEW DOORS, AND REPLACEMENT OF A SKYLIGHT (HATCH) WITH AN
AUTOMATIC OPENING VENT.**

**THE MISSION HOUSE
19 ROYAL PIER ROAD, GRAVESEND, KENT, DA12 2BD**

SEPTEMBER 2021

CONTENTS

- 1.0 INTRODUCTION AND PROPOSAL**
- 2.0 SITE CONTEXT**
- 3.0 PLANNING AND DEVELOPMENT HISTORY**
- 4.0 HERITAGE ASSESSMENT**
- 5.0 PLANNING ISSUES AND POLICY CONTEXT**
- 6.0 FLOOD RISK ASSESSMENT**
- 7.0 CONCLUSION**

1.0 INTRODUCTION AND PROPOSAL

- 1.1 This statement is prepared in support of a part retrospective application for the conversion of a single dwellinghouse (C3) to an office use (E(g)(i)).
- 1.2 The building, known as The Mission House is adjoined to the St Andrew's Church Arts Centre in a location on the riverside and close to the town centre. It is a very fine Georgian (Grade II Listed) building that is substantially unaltered externally. It is a prominent feature of the Riverside Conservation Area and the Gravesend Town Centre Opportunity Area.



Photograph 1: Photograph showing The Mission House, attached to the St Andrews Church.

- 1.3 Although the applicant is occupying the building, the alterations proposed by this application have not been started.

- 1.4 This part retrospective planning application seeks planning permission to convert this residential dwelling house (Class C3) to ‘offices to carry out any operational or administrative functions’ (Class E(g)(i)).** This use class was selected instead of E(c)(i) ‘financial services’ or E(c)(ii) ‘professional services’ because the site will not act if it were a shop. Only a very small number of customers will visit Royal Pier Road and this is because they are mostly London based and will mainly use the 30 Lombard Street, London, site if face to face contact with financial advisors is required.
- 1.5** The business, which is known as Clarence Place Wealth Management, provides services relating to retirement planning, investment planning, tax and estate planning and protection requirements. The business started in 2012 and is successful and growing, with a primary office in London (where most customers are based). Four new advisors are due to join the business (subject to contracts which have been submitted to the Financial Services Authority). One of these will work from The Mission House. They will join another 3 advisors, all of whom work from a range of locations and are not daily commuters to Gravesend.
- 1.6** At the Gravesend site there are currently 3 full time employees working from the building (and one working from home) and this is expected to rise to 10, with approximately 2 admin staff for each advisor.
- 1.7** Although they have moved into the building without Planning Permission, no alterations have been made, other than decoration of modern painted surfaces with a neutral colour. Proposed internal alterations respond to a detailed Fire Strategy (included with this application) and include the following:
- a) Existing modern roof hatch to be replaced with an Automatic Opening Vent connected to the fire alarm system;
 - b) Replacement of kitchen door with a suitable fire-resistant door;
 - c) Replacement of partition door in ground floor hallway with a suitable fire-resistant door;
 - d) Addition of fire-resistant pyro glass to be fitted over stained glass windows above partition door in hallway;
 - e) New fire-resistant doors to be installed in basement openings.
 - f) Emergency lighting to be provided on escape routes.

2.0 SITE CONTEXT

- 2.1** The Mission House and St Andrews Art Centre are prominent buildings on the riverside in Gravesend. Royal Pier Road once extended to Gravesend Pier and the High Street. The route is now only available to pedestrians and a short distance to the west of the application site the road has been replaced by a turning head. There are urban green spaces to the west, east and south and the nearest buildings are Royal Pier Mews and Clarendon Royal Hotel a short distance to the south west. Numbers 1 – 5

Royal Pier Mews appear to be in use as dwellinghouses. There is on-street parking in this location available to permit holders or for short periods only, with no return.

- 2.2 The site is located just outside the town centre boundary and a short walk from the train and bus station, the High Street and numerous town centre car parks. It is located within the town centre opportunity area and the Riverside Conservation Area. It is a high-quality environment.

3.0 PLANNING AND DEVELOPMENT HISTORY

- 3.1 There are some planning applications listed against this property, none of which are available on public access. It is clear that the dwelling is substantially unaltered externally. Although there are numerous original features internally, it has been substantially modernised and nearly all the rooms are without cornices and ceiling roses which presumably must have decorated key rooms. The planning history refers to the demolition and rebuilding of a single storey extension, but it appears (because no extensions to the building exist) that only the demolition occurred. The 1980's application below represent the most recent major alteration/restoration of the building.

[Application for Listed Building Consent for alterations and repairs to the existing elevations replacement of part of the existing slate roof with a flat roof and internal alterations in connection with the use of the building as a single-family dwelling](#)

Ref. No: 19830326 | Status: Application Permitted

Revised application for alterations and extensions involving the demolition of the existing single storey extension on the east side and its replacement by a new single storey extension having two bedrooms and a bathroom at ground floor level with a roof

Ref. No: 19820179 | Status: Application Permitted

Application for Listed Building Consent for the demolition and rebuilding of part of the front wall the demolition and rebuilding of the existing single storey extension on the east side of the building and elevational alterations

Ref. No: 19820178 | Status: Application Permitted

Alterations and extensions including demolition and rebuilding of part of the front wall and demolition of the existing single storey extension on the east side and replacement by garage and bathroom extension with roof terrace over

Ref. No: 19800401 | Status: Application Permitted

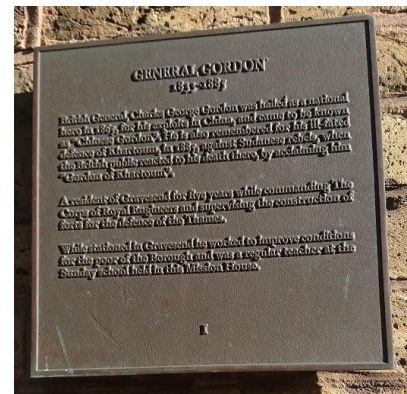
4.0 HERITAGE ASSESSMENT

- 4.1 The property comprises a C18 Grade II listed building prominently located on the riverside in Gravesend. It forms a group with St Andrews Waterside Chapel. The list description (prepared in 1975) is as follows:

“2. This adjoins St Andrew's Waterside Chapel. C18. 3 storeys stock brick. Parapet with cemented eaves cornice. 2 cambered sashes with glazing bars intact. Some blanks. The ground floor has a left side doorcase with cambered fanlight and a 1 storey right side extension.

St Andrew's Waterside Chapel and No 19 form a group”.

- 4.2 The St Andrews Waterside Chapel was built as a mission chapel for seamen and the port community in 1870. It is built from ragstone in a gothic style, designed by Victorian architect George Edmund Street in memory of Sir Frances Beaufort the inventor of the Beaufort scale. It was converted to an arts centre by the Council in 1975.
- 4.3 The application site (now known as The Mission House) was originally a public house which was used temporarily as a mission (by a Rev Robinson) prior to the chapel being constructed. The public house was known as the Spread Eagle Tavern (12 East Street) and services were held in the bar. It is reported to have closed in 1857¹ and an older building may have been on the site of the church. The priest appealed for donations to build a mission hall and the daughter of Sir Frances Beaufort responded.
- 4.4 A plaque on the wall commemorates ‘General Gordon’, a local hero and resident of Gravesend for 5 years (while commanding the Corps of the Royal Engineers). He worked to improve conditions for the poor and was a regular teacher at the Sunday school at the Mission House.
- 4.5 The Mission House is very prominent from the river, and perhaps this is its grandest elevation. It sits next to Anchor Cove and there is a flagstaff in the garden which indicates the finish line for the Thames Match. This is a traditional sail event which originates from 1863, initiated by the ‘rags to riches’ Henry Dodd who had a fleet of sailing barges moving waste on the Thames.

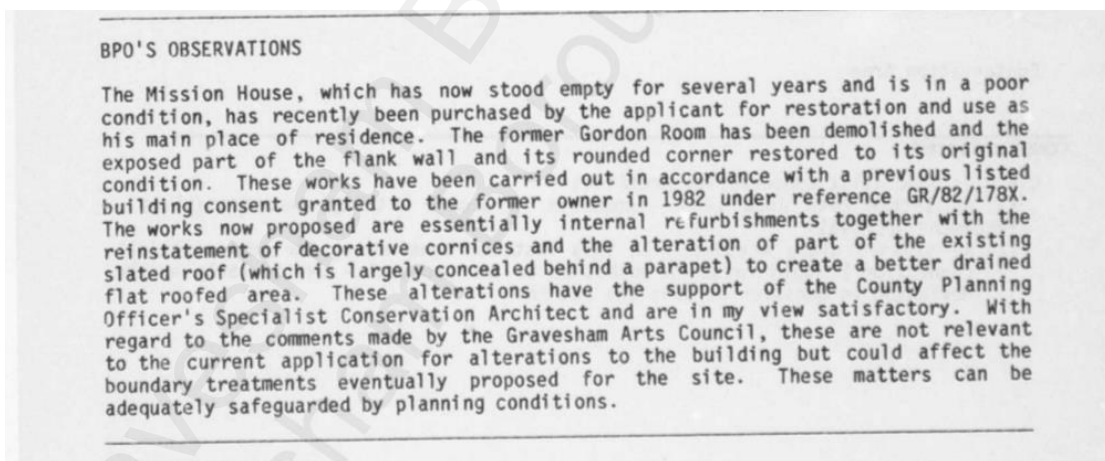


¹ http://www.closedpubs.co.uk/kent/gravesend_spreadeagle.html



Photograph 2: View of The Mission House and St Andrews Church from the river¹

- 4.6** The external openings and details of the building have survived substantially intact, with the riverside elevation grander and more decorative with architraves, and cornices above the ground and first floor openings. The northern elevation is simpler with segmental arches above windows. In the 1980's planning permission was granted to remove an extension to the side known as the Gordon Room and the following comments were made by the planning officer at that time (Planning Application No. 19830326)



- 4.7** Internally the building retains many historic and unusual features, but has been substantially modernised over time. Nearly all the rooms are without cornices, coving and ceiling roses which presumably must have decorated ceilings of key rooms. Many internal doors are more modern lightweight replacements (perhaps Victorian), which often fit the opening poorly (see photo 3). There is a simple left-hand side staircase with panelling and a partition doorway (photo 4) has been placed in the hallway (with stained glass windows above) which must have originated from a time when the building was accessed by the public.



Photograph 2²: The first floor living room prior to the office use

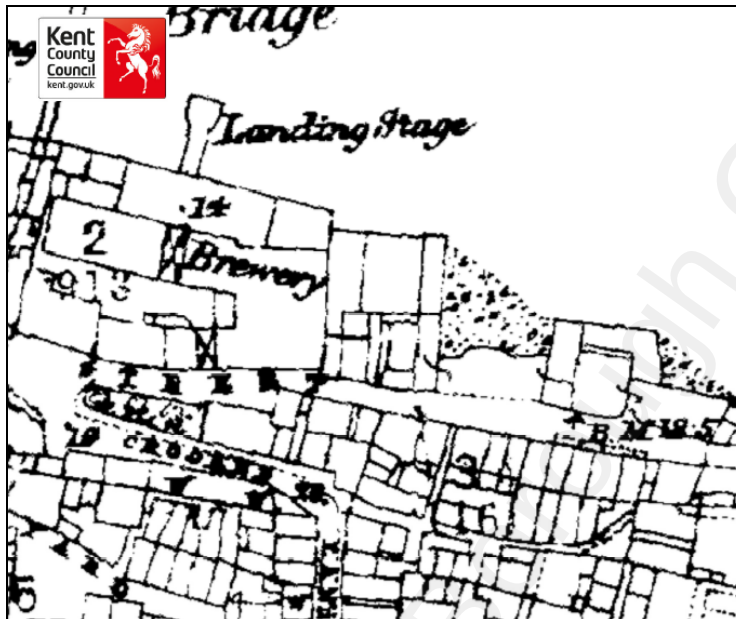


Photograph 3: Most internal doors are of this design

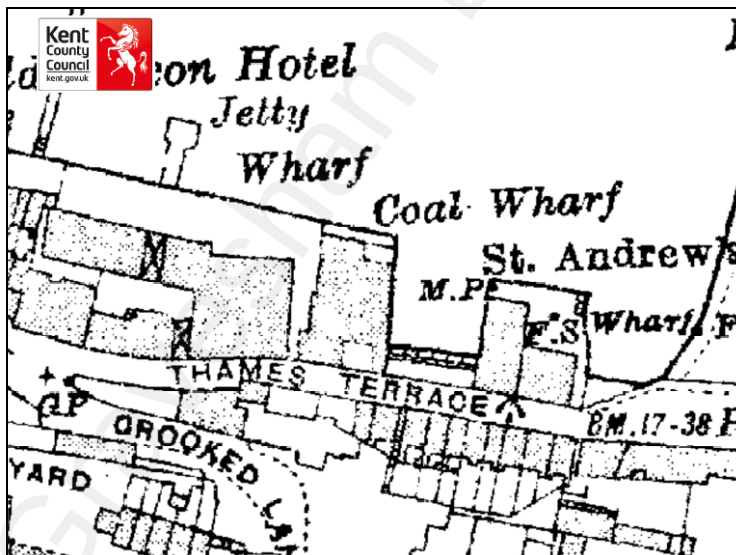
Photograph 4: Internal partition on ground floor

² <https://propertyheads.com/properties/1232739/Royal-Pier-Road-Gravesend-Kent-DA12/>

- 4.8 The site sits prominently within the Riverside Conservation Area, and is surrounded by open spaces. This was not always the case and until the late C19, there were terraced dwellings on the opposite side of East Street, to the south (see Map 1 and 2).
- 4.9 The enclosed character of the street explains the more modest detailing on the south elevation. The grander window and door details were reserved for the prominent elevation overlooking the river. Thames Terrace was demolished in the early C20 and the building is now surrounded by open spaces. It makes a significant and prominent contribution to the character and appearance of the Conservation Area.



Map 1 Kent HER 1871 - 1890



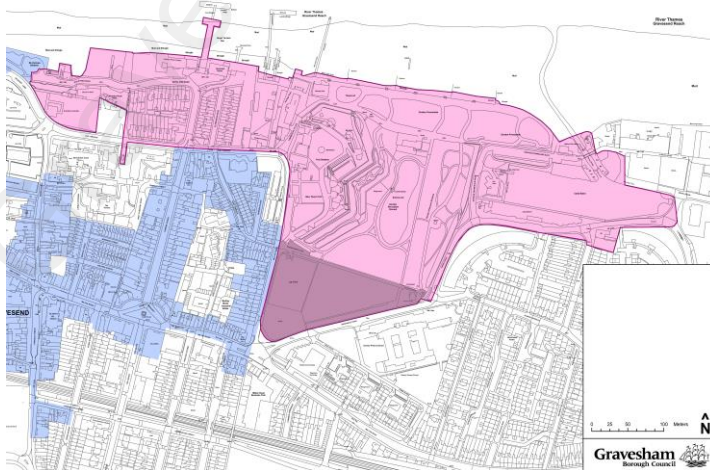
Map 2 Kent HER 1897 - 1900

Assessment of significance

- 4.10** The **significance of the building** primarily relates to its historical, and aesthetic/architectural value. The historical value is highly significant due to the associations with the church next door (with which it forms a group). The Mission House (originally the Spread Eagle Tavern) was originally the headquarters for the mission prior to the construction of the church. The church was designed by a well-known Victorian architect called George Edmund Street and funded by the daughter of Francis Beauford in his memory. These associations give the historical value of these group of buildings a particular historical resonance. The place retains its historical value even though the buildings no longer have a religious function. The use of the church as an arts centre means that it continues to be a public space to be enjoyed.
- 4.11** The Mission House itself has a significant aesthetic value that results from the outcome of the manner in which the place has evolved alongside the church. There are notable aesthetic design qualities that arise from the form, symmetry and massing of the building, and also the relationship to the river and the associated views both out from the building and towards it. The historic value of this building is **high** and the aesthetic/architectural value is also **high**.

Riverside Conservation Area

- 4.12** The site is located to the west of the Gravesend Riverside Conservation Area which encompasses a long stretch of the Thames river frontage to the east of the town centre. The town was the first port coming up the river towards London. The New Tavern Fort lies at the heart of the Conservation Area. This was rebuilt in the C19 by General Charles Gordon who also taught in The Mission House, the subject of this application. The western part of the Conservation area includes Royal Pier Road, and Clarendon Road.
- 4.13** The 2009 appraisal describes that yellow stock brick (which was the material used to construct the Mission House) is a local material and that sash windows with a vertical emphasis are important characteristic features of built form. The Conservation Area is characterised by a blend of uses, including recreational, with some residential and offices. Together the appraisal describes the area as having a sedate character away from the commercial and residential centres.



Map 3: The Riverside Conservation Area ¹

5.0 PLANNING ISSUES AND POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70 (2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 Paragraph 2 of the National Planning Policy Framework (2019) reiterates this, whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework states that local planning authorities should approach decisions on proposed development in a positive and creative way, as well as work with applicants to secure developments that will improve the economic, social and environmental conditions of the area. They should also seek to approve applications for sustainable development where possible.
- 5.4 The adopted planning policy for Gravesham consists of the Local Plan Core Strategy (2014) and the saved policies of the Gravesham Local Plan First Review (1994). There is emerging policy in the Site Allocations and Development Management Policies Plan. This has not yet completed its consultation stages and is some way off formal adoption. It is therefore to be afforded limited weight. The 2006 KCC Parking Standards SPG is also relevant.
- 5.5 Key planning issues relevant to this application are as follows:
- Impact on the significance of the listed building;
 - Impact on the character and appearance of the conservation area;
 - Impact on the vitality and viability of the town centre
 - Impact on car parking;
 - Impact on housing supply;
 - Impact on local employment.
 - Flood risk

Impact on the significance of the listed building

- 5.6 The Mission House is a Grade II listed building. Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a statutory duty to 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. Section 4 above describes the application site and its significance. As required by the NPPF, the assessment is sufficient to understand the potential impact of the proposal on the significance of the building which is mainly related to its historical and aesthetic/architectural value.

5.7 In this case it is important to consider whether the proposed change of use to offices is harmful to the significance of the building. As discussed in the heritage assessment, this building had a number of uses, originating as a pub and most recently a single residential dwelling. The adjacent church (with which it forms a group) changed its use to an arts centre in 1975 and this has preserved its significance. It is my view that a residential character is not essential to the significance of The Mission House provided that the conversion can be completed without harm to its external character and internal or external features of special architectural or historic interest. The use of a building can change and evolve through its lifetime, and the changes in society that this reflects might contribute to its interest in the future.

5.8 The office can be accommodated sensitively within the building and the applicant is aware of the responsibility of occupying a building of such significance. The proposed changes result from the outcomes of the Fire Strategy Report. The proposed changes are the minimum necessary and include a small number of variations to the standard guidance (justified by the listed status of the building):

- The kitchen door is proposed to be replaced by a fire door. A careful assessment of the building has minimised the number of doors that need to be changed. While this door is part of the historic evolution of the building, a suitable timber replacement fire door can be provided which not result in harm to the significance of the building. The existing door has substantial cracks in the existing panels and needs to be replaced in any case. The existing door should be stored in the basement of the building.
- The door in the ground floor partition is proposed to be replaced by a fire door. In this case the bespoke fire door will have glazed top panels. Both stairwells ideally need to be separate for fire safety purposes. While this door is part of the historic evolution of the building, a suitable timber replacement fire door can be provided which will not result in harm to the significance of the building. The existing door should be stored in the basement of the building.
- The stained glass panels above the ground floor partition will be fitted (on the meeting room side) with a 3 minute fire resistant pyro glass. In our view this work will not result in harm to the significance of the building.
- Four new fire resistant doors are proposed in the basement and this will provide additional fire protection to stair B. In our view this work will not result in harm to the significance of the building.
- Installation of an Automatic Opening Vent (AOV) in place of an existing roof hatch. The existing hatch does not contribute to the character nor significance of the building and (subject to design and appearance) can be replaced with an AOV without harm to the significance of the building.

- 5.9 No advertisements are proposed at this time. Should the occupier apply for any signage in the future, it would be subject to Listed Building Consent and consist of a small unlit plaque on or close to the door.
- 5.10 The proposal satisfies policies in the National Planning Policy Framework, Policy CS20 of the Gravesham Local Plan Core Strategy (which gives high priority to the preservation, protection and enhancement of the historic environment). Policy TC2 of the Gravesham Local Plan First Review (1994) refers directly to changes of use, stating that applications will be considered on their merits, with a major consideration being *‘whether the character or appearance of the listed building will suffer as a result’*. In our view the character and appearance of the listed building is preserved.

Impact on the character and appearance of the Conservation Area

- 5.11 This part of the Conservation Area is occupied by a mix of uses, including commercial, residential, arts, and hotel. It is not anticipated that the change of use of The Mission House from residential to office will have a noticeable impact on the character or the appearance of the Conservation Area. There is no parking in the locality and the staff will walk to the site from nearby public transport hubs and car parks. The Riverside Conservation Area appraisal (2009) has been reviewed, and relevant references are described in Section 4. The existing residential character is not prominent or essential to the described character of the area.
- 5.12 The proposal satisfies policies in the National Planning Policy Framework, and Policy TC3 of the Gravesham Local Plan First Review (1994) which states that development proposals should seek to have a positive contribution to the Conservation Area. In this case, where operational development is not proposed it must be sufficient to ensure that the development does not cause harm to the identified character

Impact on the Vitality and Viability of the Town Centre

- 5.13 The site is located a short distance outside the defined town centre boundary, but within the Gravesend Town Centre Opportunity Area (Core Strategy Policy CS05) which is the principle focus for town centre related economic and social activity in the borough. The policy states that the council support the provision of new offices *‘in accordance with the sequential approach, in particular where they have good access to the proposed integrated transport interchange’*. In the East of Town Centre and Riverside sub-area (in which the site is located), however, the focus is on maintaining riverside character, protecting employment floor space and facilitating river-based employment. Policy CS07 of the Core Strategy clarifies the policy on office development and the sequential approach. It suggests that office development should first be directed to the town centre, followed by edge of centre locations. The purpose of this approach is to focus development in the most sustainable locations and in those areas where development would make the biggest contribution to the vitality of the town centre.
- 5.14 The Mission House is located just outside the Town Centre. While this not strictly in accordance with the sequential test and the focus on town centre sites, it is clear that

this is a sustainable site that performs very well in terms of access to public transport. It is 650 metres away from the train and bus station and at only 100m from the High Street, the office use will certainly contribute to Town Centre vitality and viability.

- 5.15** On balance, additional employment in this location which is close to the town centre will have an overall benefit for town centre vitality and deliver a sustainable development which benefits from very good access to public transport. The proposal satisfies policies in the National Planning Policy Framework. Policy E5 of the Gravesham Local Plan First Review (1994) specifies appropriate locations for conversions to offices. The policy was introduced to avoid office conversions that are detrimental to residential areas and shopping frontages. This statement has already described that the character of this area is mixed, and will not be harmed by the development. While the sequential approach has strictly not been met, the proposal site is very close to the town centre, such that the benefits of an additional high value employment to the local area will still benefit the town centre.

- 5.16** The Council published a background paper to the emerging ‘Site Allocations and Development Management Policies Document’ in October 2020. It makes the following statements relevant to this assessment:

“Paragraph 7.4.5: The Council’s consultants considered that the town centre office offer provided a poor alignment with the potential needs of local businesses and failed to make a good quality offer to new businesses that may be drawn to the area on the back of HS1 or other economic drivers.

Paragraph 7.4.6: In particular, none of the stock was considered to provide particularly modern space, likely to meet the needs of either large or small businesses. Further, the existing larger office buildings did not lend themselves to easy sub-division or conversion to meet the needs of small or medium sized enterprises (SMEs).

Paragraph 7.4.7: Overall, the consultants found that there was a clear lack of suitable office space of sufficient quality in the town centre to accommodate a range of business types and sizes. This was being thought to hamper the economic potential of the local economy, restricting SME development and growth and, in turn, town centre employment densities.

Paragraph 7.4.8: One positive was that the scale of space/units provided within the majority of the smaller office provision was more closely aligned to the scale of space required by Gravesham’s businesses but it was still considered not to offer a particularly good quality proposition. Also, the smaller spaces had a weak presence within the Town Centre and did not create a strong presence or image for businesses occupying them. They also tended to be located in more secondary areas or were segregated from the core town centre offer, reducing the inter-relationship between offices and other amenities.

Paragraph 7.4.9: “Notwithstanding this, the consultants found that the majority of the smaller town centre office stock was basically fully let, with the only recorded

vacancies identified in older spaces above retail units along King Street, New Road and Harmer Street. However, even here it was noted that a number of units were under pressure for residential conversion. Overall, the consultants considered that the occupancy levels within the town centre suggested an underlying demand for smaller office space but that supply was not of sufficient quality/type to meet need”.

Impact on car parking

- 5.17** The Mission House sits in a very accessible location. It is within easy reach of the High Street, and Gravesend Station with its high-speed link to London St Pancras (journey time around 25 minutes).
- 5.18** Car parking in the locality is strictly controlled and employees of the office will be unable to park on-street close to the site. The applicant currently has two Town Centre Workers permits for Lord Street Car Park which is a short walk from the site and is on a waiting list for subsidised car parking.
- 5.19** Given the parking controls, it is therefore the case that irrespective of the number of employees driving to work, any cars brought into the town centre will need to rely on chargeable parking in town centre car parks. Employees will be encouraged to use public transport where possible and staff can bring bicycles to work.
- 5.20** The number of visitors to the site will be very small indeed. This is because nearly all customers are London based. KCC Parking Standards (2006) cannot be met at this site, but in cases like this the council must take account of available off-street car parking.

Impact on Housing supply

- 5.21** There is a minor impact on housing supply, but it is clear that the employment benefits of the proposal (as Gravesham recovers from the impacts of the pandemic) must outweigh this minor harm

Employment benefits

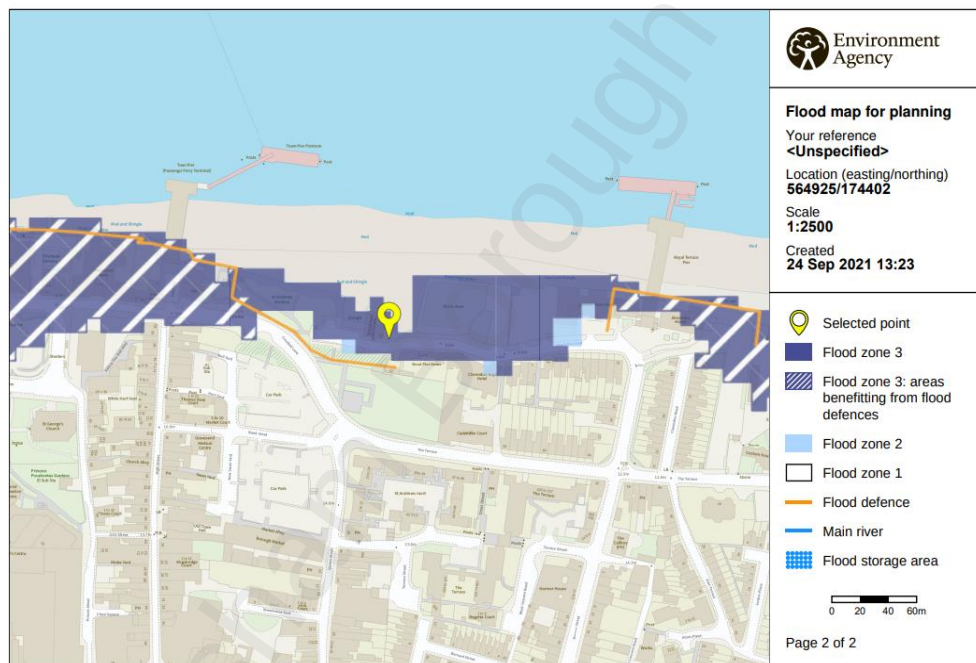
- 5.22** The Council published a background paper to the emerging ‘Site Allocations and Development Management Policies Document’ in October 2020. It draws some headline findings, including the following statement at paragraph 6.1.35:

“Gravesham has a relatively small local economy and a low number of jobs overall per head of working age population. GVA per head of population is also low compared to neighbouring authorities, although this may in part be due to out commuting and wealth generated being assigned to the place of work”.

- 5.23** It is our view that there are significant employment benefits to the local area from a high value office use. This outweighs any harm associated with the loss of a single residential unit.

6.0 FLOOD RISK ASSESSMENT

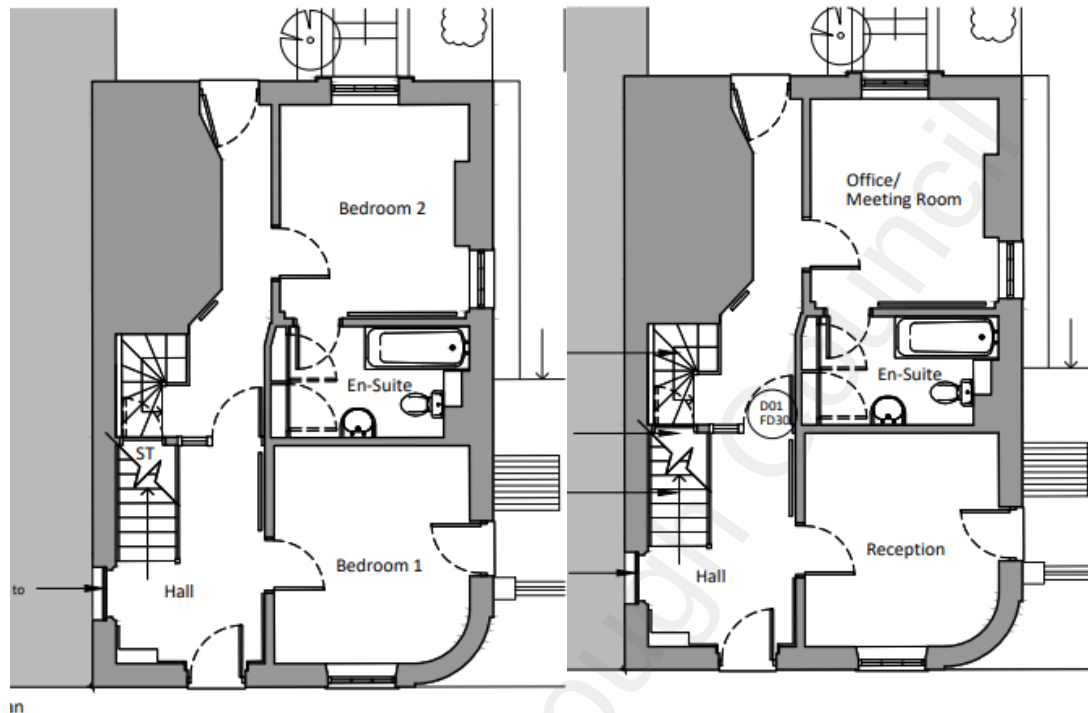
- 5.24 In this application, the building moves from a ‘more vulnerable’ residential use to a less vulnerable office use. In terms of flood vulnerability, betterment is simply achieved by the change of use. If the application is refused it will resume its use as a dwelling.
- 5.25 The site is located with Flood Zone 3 and does not benefit from flood defences. The residential use had bedrooms on the ground floor when it was last occupied because the kitchen and living room were on the first floor. The kitchen is still on the first floor. In this proposal, because the use will no longer include sleeping accommodation there is a significant reduction in flood risk because the proposed use is less vulnerable. The layout of the building seeks to include reception and meeting room space on the ground floor, so that data, key computers and equipment can be stored on upper floors.



- 5.25 There will be no reduction in flood plain storage and the proposal will not impede water flow, nor will it displace flood water. A flood emergency plan will be submitted with this application. Following the guidelines contained in the NPPF, the proposed development is considered to be suitable provided appropriate mitigation (adequate warning and evacuation procedures) can be maintained for its lifetime.

5.26 'Existing' Ground Floor Plan

Proposed Ground Floor Plan



7.0 CONCLUSION

- 7.1 The Council is requested to Grant planning permission for this development. The Heritage, Design, Access and Planning Statement has demonstrated that the proposal does not harm the significance of the listed building, not the character and appearance of the Conservation Area. The proposed site is a sustainable location for a high value office use and the benefits to the local area outweigh the loss of a single housing unit. Although the site is at risk of flooding, there is an overall benefit from having a less vulnerable use for the building.

APPENDIX A: FLOOD WARNING AND EVACUATION PLAN

- 1. The site owner / occupier should sign up to the EA Flood Warning Service as soon as possible. This is accessible on-line or via the EA operated Floodline which provides a 24hr service 0345 988 1188**
2. The site owner / occupier should design and implement a procedure for alerting users of the building of imminent flood risk and evacuation of the building.
3. A bell will be provided in the hallway as a method of raising the alarm so that occupants can escape.
4. A map showing the nearest safe place of refuge, and the evacuation procedure planning will be given to each member of staff and kept pinned in a prominent place on a wall.
5. A route of escape will be communicated to all staff to enable evacuation of the site in the event of a flood warning, or flood waters becoming evident.
- 6. On receipt of a flood alert the owner / occupier will:**
 - Monitor the situation on local media;
 - Research forecast local weather conditions;
 - Alert office staff and any visitors of the situation;
 - Prepare to evacuate if necessary.
- 7. On receipt of a flood warning the owner / occupier will:**
 - Alert scheduled visitors and staff that they should not attend;
 - Be prepared to follow instructions from Emergency Services;
 - If the building is occupied the staff must be warned of a possible need to evacuate the building.
- 8. On receipt of a severe flood warning:**
 - Remaining users of the site should be informed;
 - The site should be evacuated if safe to do so and no one should return until the alert level is lowered;
 - Be prepared to follow instructions from Emergency Services;
 - If flooding has already occurred when users of the site seek to leave, then refuge should be sought at a higher floor to await evacuation or instruction by the emergency services.