



Delegated Report

Listed Building Consent Application

Planning Application No: 20250339

Location: SLC Alarms And CCTV 20 Stone Street Gravesend Kent

Description: Application for Listed Building Consent; Internal and external alterations to upper floors in association with change of use from commercial to residential use.

Applicant: Forma Property Ltd

Site Visit Date: 19/12/2024 for previous application ref. 20241001

Submitted Documents/Plans

- Application form;
- Drawing no. A01 – Block Plan & Location Plan;
- Drawing no. EX01 – Existing Drawings;
- Drawing no. PL01 – Proposed Drawings;
- Heritage Statement; and
- Planning, Design and Access Statement.

Relevant Planning History

Reference	Description	Decision	Decision Date
20241006	Application to determine if prior approval is required for a proposed; change of use of the upper floors for use as 2 x 1bed 1 person residential units (Class C3) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class G.	Prior Notification Not Required	31.12.2024
20241001	Application for Listed Building Consent for the change of use of the upper floors for use as 2 x 1bed 1 person residential units.	Refused	31.12.2024
19890759	Application for Listed Building consent for demolition of chimney breast and internal wall on the ground floor.	Permitted	05.10.1989
19871002	Application for Listed Building Consent for the erection of replacement chimney stacks repairs to part of roof and replacement of glazing bars to nos 21 and 22 stone street	Permitted	08.01.1983

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC2 – Listed Buildings
- TC3 – Development Affecting Conservation Areas

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- 2 – Achieving Sustainable Development
- 4 – Decision-making
- 12 – Achieving sustainable development and well-designed places
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- Upper Windmill Street Conservation Area Character Appraisal (2009)
- Management Plan Gravesend Town Centre Conservation Areas (2009)

Consultations, Publicity and Representations

Consultees

Conservation Officer

The proposals are well considered and raise no major heritage issues. The heritage statement is well researched and the building description and analysis with photos is helpful.

Advise conditions for:

- Details of new internal partition walls to create the shower rooms, plans and sections of the intersections with existing walls/ceilings/cornices/skirting boards.
- Details of new fire doors to rooms – 1/10, half or full size sections showing the door in the wall.
- Details of secondary glazing and how this fits into the existing window reveals, scale as above.
- There is no mention of fire or sound proofing which is likely to be required by building regulations – this will need to be conditioned or can be submitted now to avoid conditioning.
- External lime render of the side/gable wall and colour to be agreed.
- Are there any repairs to roofs, rainwater goods? Please check as I may have missed this and if not covered they may need to be included or separate LB application will be required.

Publicity

The application was advertised by way of site and press notices – overall consultation expiry date was 16.05.2025 – no responses received.

Officer's Analysis

The application site consists of a three storey building plus basement situated on the western side of Milton Road opposite Community Square. The application site consists of a shop at ground floor (Class E(a))–

'SLC Alarms and CCTV' which sells alarms and CCTV with offices currently used as storage above.

The building is grade II listed, located in the Upper Windmill Street Conservation Area, on the A226 One Way System, the front of the building is located in the Gravesend A226 One Way System Air Quality Management Area (AQMA), with the Thames Estuary And Marshes Ramsar Buffer Zone, the Gravesend Town Centre Opportunity Area and in an Area of Archaeological Potential.

The proposal is for Listed Building Consent for internal and external alterations to upper floors in association with change of use from commercial to residential use.

Listed Building Consent was refused for the change of use of the upper floors for use as 2 x 1bed 1 person residential units under application ref. 20241001 on 31.12.2024 on the following ground:

- 1. The proposal would be unacceptable in terms of the architectural and historic interest of this grade II listed building in respect of an erosion of the original plan form, removal of some original/period fabric and insufficient information to demonstrate the full impact of the proposal on the fabric of the listed building and the Conservation Area, including any works that may be required under the Building Regulations, air quality and noise mitigation works and satisfactory access arrangements for the lower commercial unit and the proposed upper floor flats. On the basis of the submitted information therefore it must be concluded that the proposal would be harmful to the significant architectural and historic interest of this grade II listed building and the Upper Windmill Street Conservation Area contrary to Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014), saved Policies TC2 and TC3 of the Gravesham Local Plan First Review (1994) and section 16 of the National Planning Policy Framework (2024).*

It therefore needs to be seen whether the current proposal has resolved the ground of refusal of application ref. 20241001.

The principal consideration in the assessment of this application is whether the proposal would protect the architectural and historic interest of this grade II listed building and preserve or enhance the character and appearance of the Upper Windmill Street Conservation Area.

Whether the proposal would protect the architectural and historic interest of this grade II listed building and preserve or enhance the character and appearance of the Upper Windmill Street Conservation Area

The application building is grade II listed and situated in the Upper Windmill Street Conservation Area.

In this application a Heritage Statement has now been submitted which is very good quality and outlines the building in detail, changes which have occurred, the building's significance and how the current proposal would impact on the significance of this listed building.

The proposed changes with the assessment of the impact on the listed building and conservation area are set out in the Heritage Statement and are as follows:

Proposal	Assessment
External (relevant to the listed building and conservation area)	
Removal of the cementitious pebbledash render and replacement with lime render.	This would aesthetically enhance the listed building by replacing an unsightly, inappropriate surface treatment with a more appropriate one. This would also: - sustain the significance of the listed building, and - remove risks to it by replacing an impervious surface treatment with a breathable one. Both of these are described as examples of 'heritage benefits' in the National Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723).

Proposal	Assessment
	There are two strands of heritage benefits (aesthetic enhancement, and sustaining the significance of the listed building/removing risks to it).
Reconfiguration of the pipework at the rear to include soil/vents for the bathrooms.	There is an existing downpipe at the rear; this would be reconfigured to serve the bathrooms, in cast metal pipework. This kind of alteration is neither uncommon, not inherently harmful.
Change of use of the upper floors to residential.	It is clear from inspection that the upper floors are under-used and, consequently, they are not well maintained (e.g. the dilapidated windows, and the ceiling that has come down in places on the second floor). This (under-use and consequent neglect of the upper floors above ground floor commercial units) is a common problem with commercial/residential buildings like this, the upper floors of which would once have been occupied by the shopkeeper. In principle, a residential use for the upper floors would, again: i. sustain the significance of the listed building, and ii. remove risks to it. This might also be regarded as an optimum viable use of the building, bearing in mind that any such must be <u>viable</u>, as well as being optimal. In principle, the proposed change of use of the upper floors would embody the three examples of 'heritage benefits' cited in the National Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723).
Replacement of non-original internal doors with new, fire rated doors.	This would facilitate the residential conversion, while leaving the significance of the building unaffected. More appropriate panelled doors (which could be secured by condition) would be an enhancement.
Rewiring of the building.	This is a periodic maintenance issue and bringing the building up to current electrical installation standards can remove risks, e.g. fire damage or destruction, which sometimes affects older buildings where wiring has not been updated.
Removal of coverings and reinstatement of fireplaces to the rear rooms on the first/second floors.	This would enhance/better reveal the significance of the listed building by removing intrusions that obscure the original features in these rooms.
Secondary glazing to the first and second floor windows.	This would facilitate the residential conversion and improve the thermal performance of the building, while leaving the significance of the building unaffected. The installation of secondary glazing is neither uncommon where original windows exist, nor is it inherently harmful.
Removal of the inserted partitions in the first floor front room.	This would enhance/better reveal the significance of the listed building by removing intrusions that obscure the original layout and room proportions.
Insertion of a kitchen in the first floor front room.	This would generally leave the legibility of the room intact and facilitate the beneficial use of the upper floors. A very minor degree of harm is ascribed due to this overlapping

	the chimneybreast and thereby having a minor effect on the legibility of the overall first floor plan form.
Insertion of a small bathroom in the first floor rear room.	This would affect the original layout and room proportions. A minor degree of harm is ascribed due to the effect on the legibility of the plan form. It should be noted that, conversely, the general plan form and legibility of the rear room would not be obliterated, and the effect of this is far lower than the existing division of the front room, which would be removed.
Insertion of a small bathroom at the second floor rear room, which reinstates the corridor.	On one hand, this would be harmful in the sense that there would be a bathroom within the rear room. On the other hand, this would reinstate a legibility of plan form on the second floor that does not presently exist, and which would be an enhancement. The assessment is undertaken on the basis that the overall effect of this intervention is neutral, when the harm of a bathroom in the rear room is balanced with the reinstatement of a plan form that would improve on the existing layout.
Reinstatement of a wall between the second floor front and rear rooms.	This would enhance/better reveal the significance of the listed building through a reinstatement of the original layout/plan form.
Reinstatement of a door to the second floor front room, in the original location.	This would enhance/better reveal the significance of the listed building through a reinstatement of the original layout/plan form.
Insertion of a kitchen in the second floor front room.	As at the first floor, a very minor degree of harm is ascribed due to this overlapping the chimneybreast and thereby having some effect on the legibility of the plan form. It is not considered that the removal of the panel over the chimneybreast niche would materially affect the significance of the building.

The assessment sets out clearly what is proposed to the building. In terms of harm there are three areas identified.

Firstly, the insertion of a kitchen in the first floor front room where there would be overlapping of the chimneybreast and slight impact on plan form. The Heritage Statement advises how this will have a very minor degree of harm and that the room will remain intact and the proposal will facilitate the use of the upper floors. Secondly, the insertion of a bathroom in the first floor rear room. The Heritage Statement advises that this would affect the legibility of the plan form but that this would be to a minor degree as the plan form and legibility would not be obliterated and the effect would be far less than the existing division in the front room which is proposed to be removed. Thirdly, the insertion of a kitchen in the second floor front room. The Heritage Statement advises that there would be a very minor degree of harm due to the overlapping of the chimney breast and impact the legibility of the plan form but that the removal of the panel over the chimneybreast would not affect the significance of the building. Overall therefore although there would be some harm caused to the plan form and overlapping of the chimneybreasts by insertion of new kitchen and bathrooms in each flat, the harm is not identified as being significant as the majority of the room would still be intact.

The other elements of the proposed works and being the removal of the cementitious pebbledash render and replacement with lime render, removal of coverings and reinstatement of fireplaces to the rear rooms on the first & second floor levels, removal of the modern partitions in the first floor room, reinstatement of a wall between the second floor front and rear rooms and reinstatement of a door to the second floor front room in the original location would all be positive enhancements to this listed building and are most welcome.

The other elements – reconfiguration of pipework to rear including soil/vents for bathrooms, replacement of non-original doors with new fire doors, rewiring of the building secondary glazing to first and second floor levels, insertion of a small bathroom at the second floor rear room which reinstates a corridor are all considered neutral elements which would have a neutral impact on the listed building.

The Conservation Officer raises no objections to the proposal subject to conditions. In this case the Conservation Officer finds it acceptable to condition details of the fire and sound proofing works required.

Therefore, it is considered that given the current arrangement of this listed building, whilst there would be a minor degree of harm from the insertion of kitchens and bathrooms, this would be a minor degree of harm overall and the plan form of those rooms would largely still remain intact. There are many benefits from the proposal to the listed building and other elements which would have a neutral impact. Overall it is considered that subject to conditions the significance of this listed building would be protected and the character and appearance of the Upper Windmill Street Conservation Area would be enhanced. The proposal is therefore considered compliant with Policy CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR). The ground of refusal of application ref. 20241001 has therefore been resolved.

Any Other Material Planning Considerations

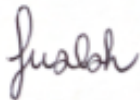
None.

Conclusion

The proposal would protect the significance of this listed building and would enhance the character and appearance of the Upper Windmill Street Conservation Area. The proposal is therefore compliant with local and national planning policy and the ground of refusal of application ref. 20241001 has therefore been resolved.

Recommendation Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	6th June 2025	Dated:	10 June 2025