



Delegated Report

Listed Building Consent Application

Planning Application No: 20250205

Location: 59A High Street Gravesend Kent DA11 0BB

Description: Application for Listed Building consent for the essential repairs to the Grade II listed property to address structural, roofing, and external maintenance issues.

Applicant: Mr Ravinder Bassi

Site Visit Date: 04 April 2025

Submitted Documents/Plans

- Application form;
- OS Plan;
- Supporting Statement;
- Design & Access Statement;
- Heritage Statement; and
- Drawing no. B5901-1 Rev. A – Site Plan Layout & Elevations As Existing.

Relevant Planning History

Reference	Description	Decision	Decision Date
20160601	Application for Listed Building Consent for removal of public house wooden bars and installation of 16 new lights in connection with proposed change of use of ground floor from Use Class A4 (Drinking Establishment) to Use Class B1(a) office and installation of new partition walls at ground floor level in order to provide separate access via the existing doors to the residential unit on 2nd and 3rd floor levels.	Permitted	23.09.2016
20160600	Change of use of ground floor from Use Class A4 (Drinking Establishment) to Use Class B1(a) office.	Permitted	23.09.2016
20140152	Application for Listed Building Consent for the change of use of basement and ground floor level from A4 (Public House) to B1 (Office), alterations of existing flats at first, second and third floor levels and erection of a single storey rear extension to the proposed B1 accommodation including associated minor demolitions to remove part of the flooring at ground level, removal window at first floor level to form new door opening and to remove part of the existing ground floor rear accommodation with refurbishment of remaining structures; removal of existing wall and gates along rear elevation and erection of new wall and gates.	Permitted	06.08.2014

20140151	Change of use of basement and ground floor level from A4 (Public House) to B1 (Office), alterations of existing flats at first, second and third floor levels and erection of a single storey rear extension to the proposed B1 accommodation including associated minor demolitions to remove part of the flooring at ground level, removal window at first floor level to form new door opening and to remove part of the existing ground floor rear accommodation with refurbishment of remaining structures; removal of existing wall and gates along rear elevation and erection of new wall and gates.	Permitted	06.08.2014
19960287	Application for listed building consent for the attachment of 2 no. floodlight units above the fascia to illuminate the front elevation and 4 no. cowl backlights to illuminate the fascia, and an alarm box adjacent to the rainwater hopper at second floor level.	Permitted	11.03.1997
19960286	Erection of a single storey rear extension to form wc accommodation and construction of new roofs over existing building and proposed extension.	Permitted	11.03.1997
19940037	Appl. for listed building consent for the attachment of 2 no. floodlight units above the fascia to illuminate the front elevation and 4 no. cowl backlights to illuminate the fascia, and an alarm box adjacent to the rainwater hopper at second floor level.	Permitted	03.05.1994
19920570	App. for Listed Building consent for internal alts. at ground, 1st, 2nd & 3rd floor levels; form of new staircase at 3rd floor; install. of casement window at 1st floor at rear; renewal of doors; reconstruction of parapet wall; re-roofing & re-pitching & rebuilding of the western boundary wall to terrace	Permitted	20.11.1992
19850882	Alterations and the erection of a single storey rear extension	Permitted	10.02.1986
19850881	Erection of single storey rear extension to form kitchen and wc accommodation internal alterations to form enlarged var and use of part of premises as guest accommodation	Permitted	07.04.1985

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- 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)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- High Street & Queen Street Conservation Area Character Appraisal
- Management Plan – Gravesend Town Centre Conservation Areas

Consultations, Publicity and Representations

Consultees

Council for British Archaeology

The CBA are broadly supportive of the principle of repairs and refurbishment to this eighteenth-century Grade II listed building. However, we recommend that some minor amendments and additional details are provided to ensure that no inadvertent harm is caused to the building's historic fabric.

Currently, we note that the decayed timber shiplap cladding is proposed for replacement with cement fibre boards. This is not a suitable option for historic buildings, due to the difference in water permeability. We recommend that the timber cladding is replaced like-for-like with new timber cladding.

We also recommend that a timber survey and method statement for its repair is submitted to allow the scope of the works to be fully understood. In the absence of plans or details of the proposed works, it is unclear how much of the existing timber frame will be affected and we are unable to judge whether the works will be undertaken with a conservation-led methodology.

If the proposed cladding material is not amended and additional details of the proposed timber repairs are not supplied, we would not consider that this application meets the requirements of para. 212 of the NPPF, due to the potential harm to the historic building's fabric. Our recommendation would therefore be that the application be refused.

No response from:

GBC Conservation Officer

Publicity

The application was advertised by way of site and press notices – overall consultation expiry date was 18.04.2025 – no responses received.

Officer's Analysis

The property is a grade II listed building which was listed in July 1975 and the listing description is as follows:

C18. 3 storeys painted brick. Parapet. 2 sashes with glazing bars intact. Contemporary bar front with pilasters and panelled risers. The rear elevation is weatherboarded and has a half-hipped tiled gable and 2 sashes with glazing bars intact.

Nos 55 to 59 (consec) and 55A form a group.

The principal consideration in the assessment of this application is whether the proposed works would preserve this grade II listed building, its setting or any features of special architectural or historic interest that it possesses.

The proposal is said to be for essential repair works to the building which are essential for the long term preservation of this Grade II listed building to address deterioration and prevent further damage.

Within the application the applicant has submitted an application form, an existing elevation and floor plan drawing from a previous application, a Supporting Documents Statement, Design & Access Statement and a Heritage Statement. There are no proposed plans. These were requested at the validation stage but the applicant advised that the proposed works are limited to essential repairs and maintenance, that they will not be making any alterations to the building's design, layout or use and therefore drawings, a Design and access statement and a heritage statement are not necessary in this instance. The applicant did subsequently submit a Design & Access Statement and a Heritage Statement and an existing plan and elevation drawing from a previous application but no proposed drawings or details have been submitted. Within the Design & Access Statement the following is listed as the proposed works:

- *Timber Frame Repairs – Replacing decayed sections of the timber frame at the front and rear elevations, particularly at the base, and applying waterproof protection to prevent future damage.*
- *Roof Repairs – Replacing damaged roof tiles, cleaning moss growth, and repairing defective lead flashing to prevent water ingress.*
- *Gutters & Downpipes – Clearing blocked gutters, replacing faulty downpipes, and ensuring proper drainage to prevent damp issues.*
- *Chimney & Parapet Works – Repairing a leaning chimney, replacing inadequate flash banding with proper lead flashing, and fixing deteriorated parapet haunching.*
- *External Cladding & Decoration – Replacing damaged timber shiplap cladding with cement board cladding for improved durability and weather resistance, redecorating external timber, and improving weatherproofing.*
- *Damp & Plastering Works – Addressing rising damp in solid walls by removing defective plaster, installing damp-proofing, and replastering affected areas.*

Within the Heritage Statement the following proposed works are listed:

- *Timber Frame Repairs: Decayed timber will be replaced with like-for-like treated hardwood, ensuring structural stability while maintaining original materials and appearance.*
- *External Cladding Replacement: The deteriorated timber shiplap cladding to the rear will be replaced with fibre cement board cladding, finished to match the original appearance while improving durability and weather resistance.*
- *Roof Repairs: Defective clay tiles will be replaced with matching handmade clay tiles, and damaged lead flashing will be reinstated.*
- *Gutter and Downpipe Repairs: Blocked or broken gutters will be cleared or replaced with cast iron alternatives to match the original style.*
- *Chimney and Parapet Repairs: Structural repairs will be made using lime mortar repointing and Code 4 lead flashing, ensuring compatibility with historic materials.*

In terms of the works proposed the following assessment is given.

Timber frame repairs – Repairs of decayed sections of timber is acceptable in principle but no detail has been given on where the decayed timbers are, the extent of timbers to be replaced, what the replacement hardwood timber would be, not only have no plans been submitted to show the extent of timbers to be replaced but no photographs have been submitted either to demonstrate the timbers and their condition. No details have been submitted on the proposed waterproof protection either. More information is needed to ascertain the extent of the timbers that it is proposed to replace to ensure that the proposal would not cause harm to the architectural and historic interest of this grade II listed building.

Roof repairs - As above for the timber repairs, the replacement of defective clay roof tiles with handmade

clay tiles is acceptable in principle but no proposed drawings have been submitted to show the extent of tiles that are said to need replacing, nor even any photographs to demonstrate the issue with the tiles. No information has been submitted on the proposed clay tile either. More information is needed to ascertain the extent of tiles that it is proposed to replace and details of the proposed tile to ensure that the proposal would not cause harm to the architectural and historic interest of this grade II listed building.

External cladding – The proposal to replace the existing timber shiplap weatherboarding on the rear elevation which is said to be deteriorated, with cement board cladding is completely unacceptable. No details have been provided of the area in question in terms of a proposed drawing or even photographs but even without these it is known that such a proposal is not acceptable. If any of the areas of the existing timber, shiplap weatherboarding do need replacing, this would need to be replaced with the same i.e. timber shiplap weatherboarding to match existing. Cement boarding cladding is not an authentic or sympathetic material for a listed building of this age. Such a proposal would cause harm to the architectural and historic interest of this grade II listed building.

Gutters and downpipes – It is stated that blocked or broken gutters will be cleared or replaced with cast iron replacements. This is not acceptable, it needs to be clear exactly what a proposal is in a Listed Building Consent application and furthermore unblocking of the gutters to ensure proper drainage should be the first thing that is tried before proposing to replace the existing cast iron gutters. No drawings have been submitted to show the gutters and downpipes nor any photographs to demonstrate their condition etc.

Chimney and parapet works –The proposal to replace the flash banding with lead flashing and re-pointing using lime mortar is acceptable in principle but again no drawings have been submitted to show the repairs nor any photographs to demonstrate the condition of the chimney or parapet. More detail is needed to show the extent and location of works, also details of mortar mix to ensure the proposal would not cause harm to the architectural and historic interest of this grade II listed building.

Damp & Plastering Works – It is said this would consist of addressing rising damp in solid walls by removing defective plaster, installing damp-proofing, and replastering affected areas. No proposed drawings have been submitted to show the extent of areas of defective plaster nor any photographs showing the areas in question. No information has been submitted on what the damp proofing method is and it is therefore not possible to assess the impact of such a proposal on this listed building as it is not known the extent of the area in question for replacement of the plaster nor what would be done to the building in terms of damp proofing to address this. More information is needed to ascertain the extent of removal of plaster and what the damp proofing method is and full details of the works to be able to do this. Without this it is not possible to assess the impact of the works proposed on this listed building.

The proposal is not considered acceptable as part of the proposal (replacement of the timber shiplap weatherboarding with cement boarding cladding) would be harmful to the architectural and historic interest of this grade II listed building and for all of the other elements insufficient information has been submitted to enable an assessment of their impact on the architectural and historic interest of this grade II listed building. Although a Heritage Statement has been submitted this does not provide any historic building assessment to explain the evolution of this building to demonstrate how it has evolved from its original construction to the present day and it does not establish the significance of the building in any detail and how the proposed alterations would affect it. In terms of many of the works, there is no detail on them. Without an assessment of this building to inform the proposal, it cannot be said that it would not result in the loss of historic fabric and would not cause harm to the listed building. Without an assessment of the building, its evolution and an assessment of its significance together with full details of the proposal and an assessment of them on the significance it cannot be said that the proposal would not have a harmful impact on the architectural and historic interest of this listed building.

One of the core planning principles of the NPPF (2024) is that heritage assets, such as listed buildings and conservation areas should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life for this and future generations. In this case, one of the proposed works would cause harm and for the rest insufficient evidence has been submitted to demonstrate that the proposed works would not result in harm to this listed building.

The NPPF (2024) requires great weight to be given to the conservation of designated heritage assets. It states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It draws distinction between substantial harm and less than substantial harm to such an asset. In this case it is considered that less than substantial harm would be caused. The NPPF (2024) states that in such a case, the harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use.

Whilst repair works are important to protect the future of any listed building, these need to be done in a manner which protects the architectural and historic interest of the listed building and the Local Planning Authority needs full details of any proposed works to ensure the special interest would be protected.

The applicant has stated that the repair works to the building are essential for the long term preservation of this grade II listed building to address deterioration and prevent further damage.

In accordance with paragraph 212 of the NPPF (2024), great weight is given to the conservation of a designated heritage asset. Whilst the proposal may well be for repairs, one of those proposals would be harmful to the listed building and with the others there is insufficient information to enable an assessment of the impact of those proposals on the architectural and historic interest of this listed building. The aims of the long term preservation of the building and to address deterioration and prevent further are appreciated and welcomed but this is not considered to justify the element of the proposal which would cause harm to the significance of this listed building and for which insufficient information has been submitted for the other elements of the proposal. In this case, it is considered there are no public benefits that would outweigh the harm identified.

It is concluded that the proposal would not preserve the special architectural or historic interest of this grade II listed building or the character of appearance of the High Street & Queen Street Conservation Area. As such the proposal is 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).

Any Other Material Planning Considerations

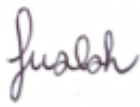
None.

Conclusion

For the above reasons, it is concluded that the application is contrary to local and national planning policy and should be refused listed building consent.

Recommendation: Refusal

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	7th May 2025	Dated:	07 May 2025