

Delegated Report

Listed Building Consent Application

Planning Application No: 20240686

Location: Custom House The Terrace Gravesend Kent

Description: Application for Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking.

Applicant: Mr Michael Keckes

Site Visit Date: Previous application refs. 20210757 & 20210758 & 30.01.2025

Submitted Documents/Plans

- Cover Letter;
- Application form;
- Drawing no. 001 – Site Block and Location;
- Drawing no. 002 – Existing Site and Roof Plan;
- Drawing no. 003 – Existing Site Lower and Upper Ground Plans;
- Drawing no. 004 – Existing Site First and Second Floor Plans;
- Drawing no. 005 – Custom House Main Building 1 of 2 Existing Plans;
- Drawing no. 006 – Custom House Main Building 2 of 2 Existing Plans;
- Drawing no. 007 – Custom House Main Building Existing Elevations;
- Drawing no. 008 – Custom House Outbuildings Existing Plans;
- Drawing no. 009 – Custom House Outbuildings Existing Elevations;
- Drawing no. 010 – Workshop Existing Plans and Elevations;
- Drawing no. 011 – Boathouse Existing Plans and Elevations;
- Drawing no. 012 – Gazebo Existing Plans and Elevations;
- Drawing no. 013 – Existing Streetscenes;
- Drawing no. 014 – Existing Streetscenes;
- Drawing no. 015 – Existing Site Sections;
- Drawing no. 016 – Existing Site Sections;
- Drawing no. 020 Rev. G – Proposed Site and Roof Plan;
- Drawing no. 021 Rev. E – Proposed Site Lower and Upper Ground Plans;
- Drawing no. 022 Rev. D – Proposed Site First and Second Flood Plans;
- Drawing no. 023 Rev. B – Proposed Streetscenes;
- Drawing no. 024 Rev. C – Proposed Streetscenes;
- Drawing no. 025 Rev. SK-F – Custom House Main Building 1 of 2 Proposed Plans;
- Drawing no. 026 Rev. SK-F – Custom House Main Building 2 of 2 Proposed Plans;
- Drawing no. 027 Rev. A – Custom House Main House Proposed Elevations
- Drawing no. 028 Rev. SK-H – Custom House Outbuildings Proposed Plans;;

- Drawing no. 029 Rev. B – Custom House Outbuildings Proposed Plans;
- Drawing no. 030 Rev. SK-C – Unit 20 Workshop Proposed Plans
- Drawing no. 031 Rev. SK-C – Units 21, 22, 23 & 24 The Boathouse Proposed Plans;
- Drawing no. 032 Rev. SK-E – Units 26, 27 & 28 New Build Proposed Plans;
- Drawing no. 033 – Gazebo Proposed Plans and Elevations;
- Drawing no. 034 Rev. B – Proposed Site Sections;
- Drawing no. 035 Rev. A – Proposed Site & Lower Ground Floor Plan EA Requirements;
- Drawing no. 036 – Proposed Site Sections EA Requirements;
- Drawing no. 037 – Section – Relationship to PLA New Build Proposed Plans;
- Drawing no. 040 Rev. B – Demolition Lower and Upper Ground Plans;
- Drawing no. 041 Rev. B – Demolition First and Second Floor Plans;
- Drawing no. 050 Rev. B – Proposed Landscaping Plan;
- Drawing no. 071 – Cycle Storage Plan Semi-Vertical Storage;
- Drawing no. 072 Rev. B – Strategy Plans First and Second Floor Plans;
- Drawing no. 100 – Detail 01 Typical New Window Detail;
- Drawing no. 101 – Detail 02 Typical New Rooflight Detail;
- Drawing no. 102 – Detail 03 Opening to be closed retaining door;
- Drawing no. 103 – Detail 03 Shadow Gap Detail;
- Drawing no. 104 A – Detail 05 Suspended Ceiling Detail;
- Drawing no. 105 Detail 06 Spine Wall Opening Detail;
- Drawing no. 106 – New external staircase typical detail;
- Drawing no. 107 – Detail 07 – Bathroom Pod;
- Drawing (un-numbered) – Custom House Main Building First Floor;
- Drawing (un-numbered) - Custom House Main Building Second and Third Floor Plan;
- Drawing no. (un-numbered) - Custom House Main Building Lower Ground Floor;
- Drawing no. (un-numbered) – Custom House Main Building Upper Ground Floor Plan;
- Drawing no. (un-numbered) - Opportunities and Constraints;
- Suggested conditions in respect of the Port of London Authority;
- Preliminary Ecological Appraisal (PEA) Ref: 1149_R01_Rev B_PEA;
- Bat Survey Report, Ref: 1149_R02_REV A_Bat Survey Report;
- Heritage and Conservation Strategy, July 2024;
- Accommodation Schedule;
- Design & Access Statement July 2024 Rev. A; and
- Heritage Statement, June 2024.

Relevant Planning History

Reference	Description	Decision	Decision Date
20240563	Application for non-material amendment to planning permission reference number 20210757 to allow removal of reference to housing mix from application description.	Permitted	22.07.2024
20240449	Application for approval of condition 3 attached to planning permission reference number 20210757 relating to The Construction Environmental Management Plan (CEMP).	Approved	04.10.2024
20240443	Application for approval of condition 6 attached to planning permission reference number 20210757 relating to details of the measures which shall be undertaken to divert the public sewer(s) underneath the site.	Approved	16.08.2024

20240285	Application for approval of condition 4, 5, 7 and 8 attached to planning permission reference number 20210757 relating to a strategy to deal with the potential risks associated with any contamination of the site, particularly the workshop and boathouse (4), the implementation of a programme of archaeological work in accordance with a written specification and timetable (5), a detailed sustainable surface water drainage scheme (7) and a landscape management plan detailing how the shingle beach habitat and other envisaged ecological enhancements within the site will be maintained (8).	Approved	16.07.2024
20210758	Application for Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking.	Permitted	24.11.2023
20210757	Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking.	Permitted	24.11.2023

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable 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.

Other material considerations

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area

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

- Gravesend Riverside Conservation Area Character Appraisal (2009)
- Management Plan – Gravesend Town Centre Conservation Areas (2009)

Consultations, Publicity and Representations

Consultees

GBC Environmental Protection

The comments made for the variation application 20240687 dated 17th February are relevant to this application.

Kent Police

1. We recommend the use of the Secured By Design (SBD) initiative for this proposal.
2. Regarding permeability, the design and layout must ensure routes are well-designed to create safer accessible neighbourhoods with maximum natural surveillance but avoid excessive permeability often linked to increased crime rates. Lockable gates are recommended to be installed in the communal riverside terrace adjacent to the Gazebo as well as appropriate boundary treatment (please refer to point 3). Restricting access during night time would discourage youths from congregating and causing nuisance near plot 19.
3. Perimeter, boundary and divisional treatments should be well established and are required for front gardens of any corner properties. Rear boundaries and divisional fencing between rear gardens need to be a minimum height of 1.8m to aid security and privacy. This particularly applies to plot 19 due to being adjacent to the communal riverside terrace and the end corner on The Terrace where the entrance to the site is located.
4. Recessed areas at ground floor level are a significant concern, they are likely to attract crime, ASB and nuisance and can provide a secluded space that attracts criminality. Recessed doors should be no deeper than 600mm especially if hidden from public view e.g. side or rear, unless on an active street frontage with maximum natural surveillance and public view but even then, no deeper than 1m. However, where the width too is below 1m and there is no significant natural surveillance opportunity, the recess must not exceed 600mm.
5. All Apartment communal doors require alarms on all the emergency access doors and visual/audio

control. They should allow a conversation between visitors and residents while allowing residents to identify visitors before they decide if they should remotely allow access via the communal entrance door. Tradesperson or timed-release mechanisms are not permitted as they have been proven to be the cause of antisocial behaviour and unlawful access to communal developments.

6. Communal mail delivery for the apartments needs to be “through the wall” or sited at the front in an air lock within the lobby, have CCTV coverage, be of robust construction (SBD or Sold Secure standard) and have anti-fishing design. We strongly recommend TS009 specifications.

7. Parking Courts, if unavoidable, must be designed to minimise the opportunity for crime with maximum natural surveillance from “active” windows (kitchen or lounge windows for example) and they should be designed for a small number of vehicles only. SBD discourage rear parking courtyards because: “They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated.” The use of allocated parking spaces and clearly signed rule setting for visitor spaces reduces the opportunity for conflict. Allocated parking spaces must not identify the residents flat/house number. SBD or Sold Secure ground or wall anchors to help address vehicle crime should be provided for Motorbikes, Mopeds, Electric bikes and similar.

8. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, loitering and ball games. The provision of a 1m buffer zone using either a 1.2 – 1.4m railing or a 1m mature height hedge with high thorn content should address those issues.

9. Please note, we are not qualified lighting engineers and any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states: “18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.” Lighting of all roads including main, side roads and car parking areas should be to BS5489- 1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards. Any lack of adequate lighting for the new adopted route and the pedestrian walkway is a concern as it will encourage home and vehicle owners to install ad-hoc lighting, likely to cause conflict and light pollution.

10. We recommend each dwelling is provided with a well-lit and secure area to store their bins, to prevent them being used as a climbing aid. Please note these storage areas should not be placed against the external wall of the property where it can be used as a climbing aid onto a balcony/vulnerable window.

11. Doorsets. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development. For this site we recommend the use of “Guide For Selecting Flat Entrance Doorsets 2019”.

12. Windows. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.

13. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than “round shaped” trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. In addition, new shrubs should be maintained at a height of no more than 1m unless planted to create a densely planted defensive perimeter treatment. There are many prickly non-toxic, native species that if densely planted with long term management can aid security. Any hedges used as a garden boundary must be dense and mesh fencing incorporated to prevent gaps/ desire lines being used to access rear gardens. Great care must be taken to ensure that the natural surveillance of all car parking areas and front windows is not affected, and therefore, shrubs/trees must be properly maintained.

14. We recommend CCTV to monitor the communal riverside terrace and the main entrances and mail delivery area on The Terrace to prevent anti-social gathering.

15. If cycle storage is proposed, we recommend a secure store with lighting and access control for the residents. We also recommend the installation of ground or wall SBD or Sold Secure anchors.

If approved, site security is required for the construction phase. There is a duty for the principle contractor “to take reasonable steps to prevent access by unauthorised persons to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

Port of London Authority

Thank you for your emails and letters received on 3 February regarding applications 20240687 and 20240686. Further information/clarification has been submitted for both applications relating to noise, including the fixing shut of windows and the scheme for testing internal noise levels. The Applicant liaised with the PLA prior to the submission of this information/clarification and I can therefore advise that the PLA has no objection to the submitted documentation and no further comments to make in relation to noise.

The application seeks the variation of condition 2 in relation to the list of approved plans. Whilst the PLA’s comment (as set out in its email of 03/09/2024) in relation to the area by the gazebo does not appear to have been addressed, as the discrepancy was in the design and access statement it would appear to not be impacted by the variation of condition 2.

Publicity

The application was advertised by way of site and press notices – overall consultation expiry date was 17 February 2025 – no comments received.

Officer’s Analysis

Planning permission was granted for ‘Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking’ under application ref. 20210757 on 24 November 2023.

Listed Building Consent was granted for ‘Listed Building Consent for the redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with internal and external alterations and erection of a new three storey building to provide 27 residential units (6 x 1 bed, 15 x 2 bed and 6 x 3 bed) with associated landscaping and parking under application ref. 20210758 on 24 November 2023.

For reference it should be noted that the applicant submitted an application for a non-material amendment to planning permission reference number 20210757 to allow removal of the reference to the housing mix from the application description. This was permitted on 22 July 2024 and the effect of this decision amended the description of the development of planning permission reference 20210757 to the following:

Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units with associated landscaping and parking.

With the reference to the housing mix now removed from the description the applicant has now submitted two applications for consideration - a variation of condition application to planning permission ref. 20210757 (which is subject of application ref. 20240687 that is currently pending consideration) and a new Listed Building Consent (which is the subject of this current application) for the whole development in its entirety again but including the changes they want to make to the approved scheme. The applicant has had to submit a fresh Listed Building Consent application for the whole development given that amendments cannot be made to a Listed Building Consent.

For ease of reference the proposed changes compared to the Listed Building Consent already granted under application ref. 20210758 are to allow for internal and external alterations to facilitate additional bedspaces to increase the number of bedrooms in the development. This involves proposing new internal walls in Custom House, the outbuildings, the workshop, the boathouse, the new building as well as the insertion of cupboards. There are also external alterations proposed in the form of additional rooflights with two extra rooflights proposed to the workshop and one extra rooflight proposed for the new terrace.

The number of units would remain the same (27) but the number of bedrooms in the development overall would increase. The number of consented bedrooms in application ref. 20210757 was 53 and the applicant is now proposing 65 bedrooms which would be an addition of 12 bedrooms.

Approval

In approved application ref. 20210757 the approval was for 27 units in the following ratios: -

- 1 beds - 7
- 2 beds - 14
- 3 beds – 6

Total units = 27

The bedrooms were divided as follows in the individual buildings on the site:

Outbuilding – 18 bedrooms
Custom House – 21 bedrooms
Workshop – 2 bedrooms
Boathouse – 6 bedrooms
New build – 6 bedrooms

Proposal

In this current proposal the mix of units is proposed as follows:

- 1 beds - 7
- 2 beds - 9
- 3 beds – 4
- 4 beds – 6
- 5 beds - 1

Total units = 27

The bedrooms would be divided as follows in the individual buildings on the site:

Outbuilding – 22 bedrooms (increase of 4 bedrooms)

Custom House – 23 bedrooms (increase of 2 bedrooms)
Workshop – 3 bedrooms (increase of 1 bedroom)
Boathouse – 6 bedrooms (no increase in bedrooms)
New build – 11 bedrooms (increase of 5 bedrooms)

The principle issue in the assessment of this application is whether the proposal would respect the architectural and historic interest of the listed and curtilage listed buildings on the site and their setting, the surrounding listed buildings and whether the proposal would preserve or enhance the character and appearance of the Riverside Conservation Area.

Listed Building and Conservation Area Impact

Sections 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent. Section 72(1) of the Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

These duties are reflected in Section 16 of the NPPF (2024), Policy CS20 (LPCS) and saved policies TC2 and TC3 (LPFR). These policies set out that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource central to the regeneration of the area and the reinforcement of sense of place. Furthermore, these policies expect development to make a positive contribution to Conservation Areas.

On the application site Custom House and the Gazebo are grade II listed buildings. The site is also situated in the Riverside Conservation Area. There are a number of listed buildings within the vicinity – Milton Chantry, New Tavern Fort (also a Scheduled Ancient Monument), 42, 43, 44, 45, 46 & 47 The Terrace and Royal Terrace Pier.

The Custom House appears to have been built by the King's Office of Works in 1815-16 for both Customs & Excise Officers. It replaced what is now Whitehall Place, on the other side of The Terrace, which was built as the first purpose-built offices and accommodation for Custom Officers in 1780-2. The Custom House was Grade II listed in 1975 when the revised survey of listed buildings in Gravesend was issued and is situated in the Riverside Conservation Area (designated in 1980).



1835 drawings of the south elevation of Customs House

As well as the main Custom House the site also consists of a number of other buildings – the Coach House attached to the western side of Custom House, the Custom House outbuildings to the rear and running down the eastern boundary of the site, the Workshop and Old Boathouse, the Boathouse and the Gazebo. Both Custom House and the Gazebo are grade II listed with the other buildings being curtilage listed buildings. The proposal consists of a number of different elements to each of these buildings as will be discussed below.

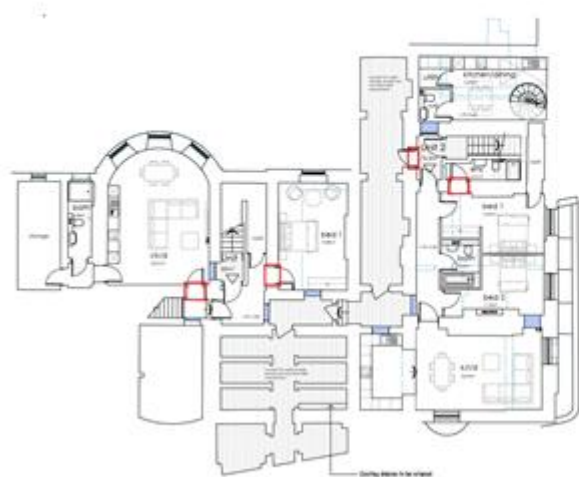
The key consideration is whether the proposals would respect the architectural and historic interest of these listed and curtilage listed buildings and their setting, the surrounding listed buildings and whether the proposal would preserve or enhance the character and appearance of the Riverside Conservation Area. A Heritage Statement and a Heritage and Conservation Strategy have been submitted with the application which provide a detailed and thorough assessment of the impact on these heritage assets. The Heritage and Conservation Strategy sets out how the highest significance relates to Custom House and the Gazebo being of 'higher significance'. The coach house and the nearest part of the outbuildings at upper ground floor level is considered to be of 'medium' significance. The rest of the outbuildings, the Old Boathouse and the Boathouse are of 'lower' significance, the Workshop is considered to be of 'neutral' significance and the flood wall is considered to be a 'negative' significance.

Custom House – this is not to be extended but the existing fabric is to be restored and conserved with minimal alterations proposed to enable the conversion in terms of new internal walls. Compared to the original approval under Listed Building Consent ref. 20210758 there are further changes in respect of altering the positioning of approved walls and installing new cupboards.

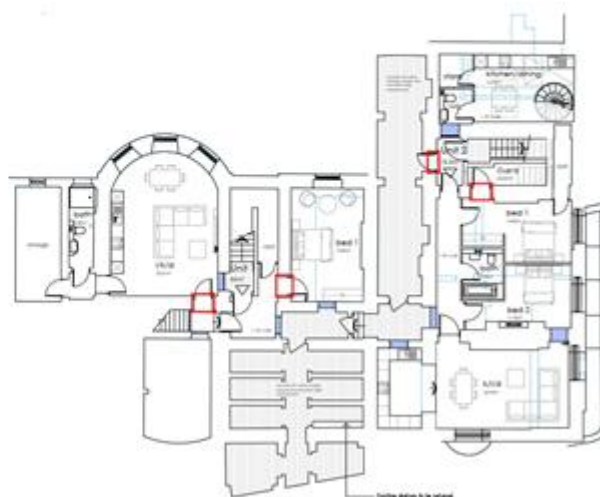
A comparison of the approved and proposed floor plans for Custom House is as follows:

Lower Ground Floor Plan

Approved



Proposed



Upper Ground Floor Plan

Approved

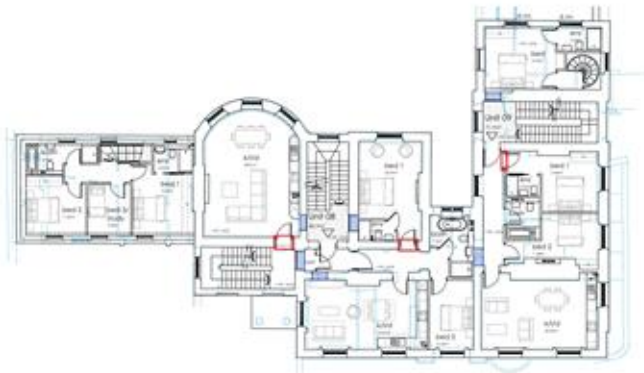


Proposed

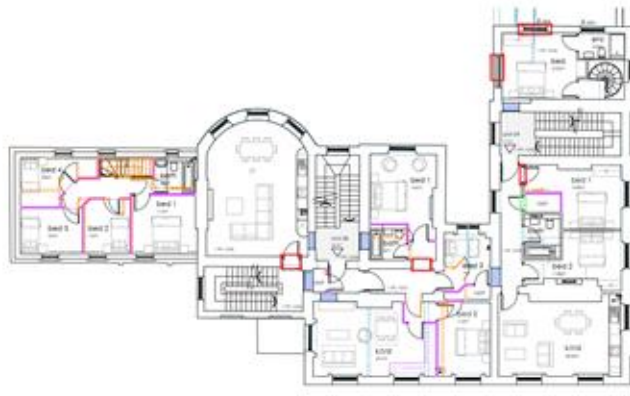


First Floor Plan

Approved



Proposed



Second Floor Plan

Approved

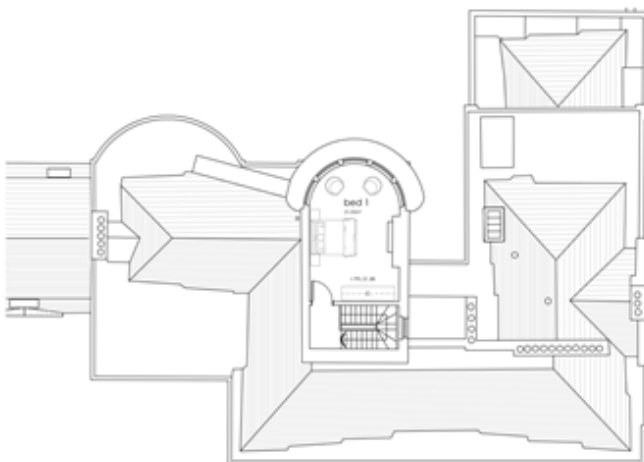


Proposed

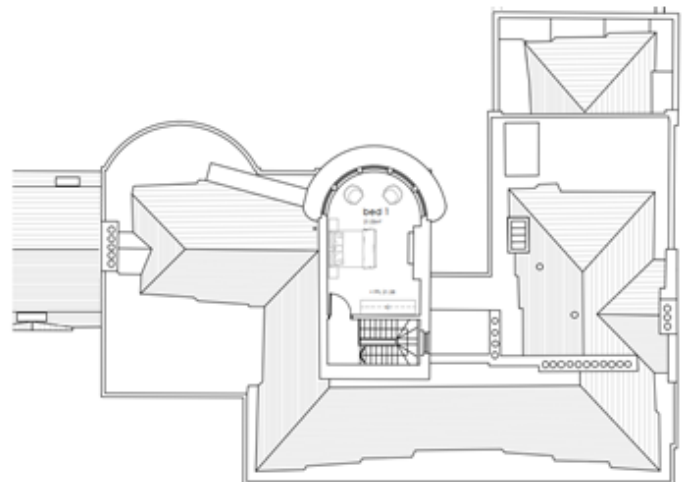


Third Floor Plan

Approved



Proposed



At basement level there are no changes proposed from what has been approved.

At upper ground floor level in unit 4 there would be new walls to create a cupboard in the hall. In unit 5 there would be new walls to create a cupboard in bedroom 2. In unit 6 there would be new walls to create a cupboard in the bedroom and a cupboard in the kitchen/living/dining room. In unit 7 there would be new walls to create two cupboards and a new wall already approved would be relocated slightly further north. Subject to detailing the material and method of attachment of the cupboards to ensure that they are a temporary and reversible feature it is considered that the proposed new walls would be acceptable.

At first floor level in unit 4 which is part of the coach house the internal walls would all be slightly relocated however, this is acceptable as this is in the first floor extension which has been permitted to the coach house and so is not in historic fabric. In unit 8 there would be a new internal wall to create a cupboard in

bedroom 1 and walls that have already been permitted to form an en-suite would be slightly relocated to create a larger bathroom. In bedroom 3 there would be new walls to create a cupboard and in the combined kitchen/living/dining room there would be new walls to create a lobby area and relocation of an already approved wall slightly to the west. As the walls have already been approved in bedroom 1 and in the combined kitchen/living/dining room their slight relocation is considered acceptable and as above, subject to details of the cupboards it is considered they would be acceptable also.

At second floor level in unit 10 there would be new walls to create a cupboard in the hall and to create a cupboard in the bathroom where a shower was shown in the approval (a bath is proposed). In unit 11 there would be new slightly re-located walls to create a slightly enlarged bedroom 2 to change this from a single to a double bedroom and formation of a new cupboard in place of an en-suite in bedroom 1. As the wall in unit 11 was already approved in bedroom 2 its slight relocation would cause no harm and the new cupboards would be acceptable as above subject to details.

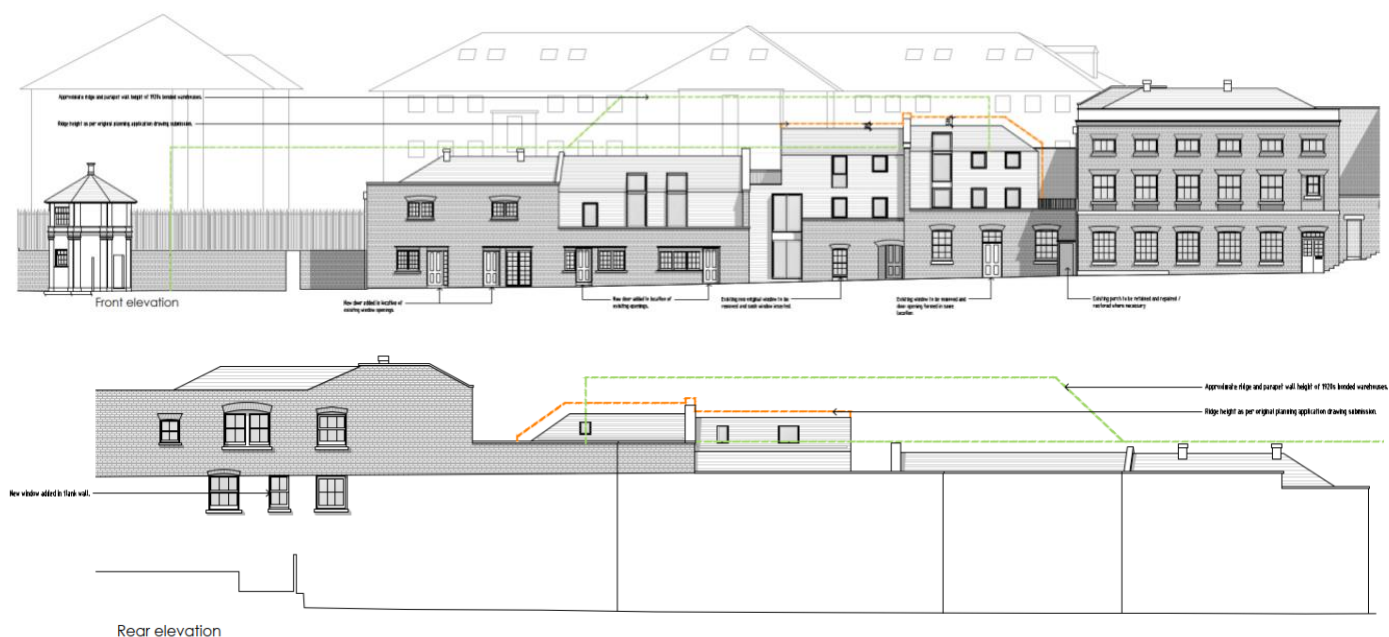
At third floor level there are no changes proposed compared to the approved scheme.

Subject to detailing the material and methods of attachment of the cupboards to ensure they are a temporary and reversible feature these are considered acceptable. The slight alteration in terms of the internal walls is acceptable subject to conditioning details of the walls.

Overall, in respect of Custom House and subject to details the proposal would not cause harm to the architectural and historic interest of this grade II listed building or the character or appearance of the Riverside Conservation Area.

Coach House - As it is not of quite such high heritage significance as the main Custom House, an extension to the coach house is considered acceptable subject to appropriate design and detailing. The design would respect the setting of this attached listed structure, the setting of the main grade II listed Custom House to which it is attached, the other listed and curtilage listed buildings on the site, the surrounding listed buildings and would preserve the character and appearance of the Riverside Conservation Area. Compared to the original approval under Listed Building Consent ref. 20210758 there are changes proposed in respect of internal alterations in terms of a new cupboard at ground floor level and internal walls to create an additional bedroom at first floor level as shown in the Custom House plans above; these changes are considered acceptable. Subject to conditions the proposals to the coach house are considered acceptable.

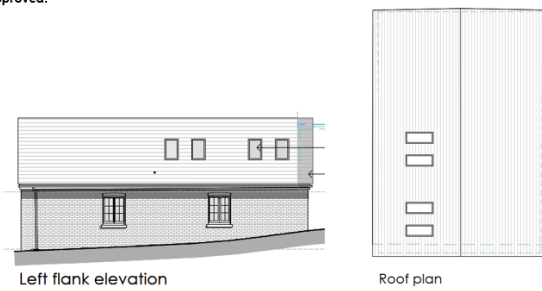
Outbuildings – These range from one to two new storeys being added to the existing outbuildings. The extensions step down from two new storeys being added to the nearest half of the outbuilding to Custom House (which is identified in the Strategy as medium heritage significance at upper ground floor level and lower significance at first floor level) to the half nearest the river having just one new storey added (this element being identified of low heritage significance). Given the medium and low heritage significance of the outbuildings it is considered that there is scope for extensions to them. The extensions proposed are considered sympathetic additions which would respect this curtilage listed building, the setting of the main Grade II listed Custom House and Gazebo and other curtilage buildings on the site, the setting of the surrounding listed buildings and would protect the character and appearance of the Riverside Conservation Area. The additions and alterations proposed to the outbuildings are shown below:



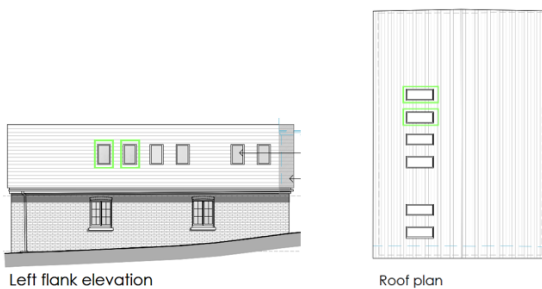
Compared to the original approval under Listed Building Consent ref. 20210758 there are further changes proposed in respect of internal alterations in terms of walls and cupboards. In unit 12 there would be the installation of cupboards in bedrooms 2 and 3 at upper ground floor level and a slight relocation of an already approved wall to enlarge bedroom 4 to change it from a single to a double bedroom. In unit 13 there would be slight relocation of two already approved walls to change the approved bathroom at first floor level into bedroom 5. In unit 14 there would be new walls at first floor level to form a cupboard in bedroom 1. In unit 15 there would be new walls for the installation of a cupboard in the bathroom at upper ground floor level and at first floor level there would be the relocation of the approved internal walls to change the approved layout of a double bedroom, dressing and en-suite to two single bedrooms and a cupboard. In units 16, 17 & 18 there would be the installation of walls to create cupboards in the landings at upper ground floor level. In unit no. 19 there would be the installation of walls to create a cupboard at lower ground floor level in place of the approved study. The re-location of walls and new cupboards are considered acceptable. Subject to conditions the proposals to the coach house are considered acceptable.

Workshop – The mid-20th century element attached to the rear would be demolished which is considered acceptable as it is not of any architectural or historic value and identified as neutral heritage significance in the Strategy. The workshop element to remain (which is of low heritage significance) would have new and altered window and door openings and a first floor put in. These are considered acceptable given the minor alterations, which will be an improvement in respect of the fenestration and given the low heritage significance of the building. The proposals to the workshop are therefore considered to respect this curtilage listed building, the setting of the main Grade II listed Custom House and Gazebo and other curtilage buildings on the site, the setting of the surrounding listed buildings and would protect the character and appearance of the Riverside Conservation Area. Compared to the original approval under Listed Building Consent ref. 20210758 there are changes proposed in respect of the rooflights and wall arrangement. Four rooflights were permitted under ref. 20210758 in the left flank roof slope and two additional rooflights are proposed to make six overall.

Approved:



Proposed:



The two additional rooflights in the left flank roof slope of the Old Boathouse are considered acceptable and would be modest additions to the rooflights already approved under ref. 20240758. Within the workshop there would be alterations to the approved layout at first floor level. The first-floor level does not exist currently and would be formed in the building with the aid of rooflights. As the formation of the first floor is completely new, the re-ordering of the approved internal layout is considered acceptable. The increase in the amount of accommodation at first floor level is also acceptable as the two additional rooflights that are proposed in addition to the four already approved would be satisfactory in respect of character and appearance and the setting of the listed buildings on the site. Subject to details the proposals to the workshop are considered acceptable.

Boathouse - No extensions are proposed and as with the workshop it is alterations and new window and door openings that are proposed which are considered sympathetic to the building's character. It is considered the minor alterations proposed would respect this curtilage listed building, the setting of the main Grade II listed Custom House and Gazebo and other curtilage buildings on the site, the setting of the surrounding listed buildings and would protect the character and appearance of the Riverside Conservation Area. Compared to the original approval under Listed Building Consent ref. 20210758 there are changes proposed in respect of the installation of new walls in unit 23 to form a cupboard under the stairs at lower ground floor level and within unit 24 at upper ground floor level to form a cupboard in bedroom 1. Subject to details the proposals to the boathouse are considered acceptable.

Gazebo – The gazebo building is proposed to be repaired and conserved to be used as a communal multi-use space. There would be no direct access to the gazebo from the site and instead to access the gazebo one would have to exit and go all the way round to the front of Heritage Quay to access the area firstly through a gate to the side of Heritage Quay and then through a second gate in the Custom House boundary wall; this would not be acceptable. In Listed Building Consent application ref. 20210758 the Council's Conservation Officer was concerned that with no direct access for residents from within the site it could not be seen how the gazebo would have a viable or sustainable purpose. The Conservation Officer questioned how the area would be managed and if it would be made open to the public and was also concerned that the gazebo would become an unsecured area with the threat of vandalism and arson. The Gazebo is shown in the below images:



Gate to side of Heritage Quay



Gazebo and access from path to side of Heritage Quay as viewed from inside the site

In order to ensure the gazebo does not become isolated from the main Custom House site the following was considered an appropriate way forward. The protection of the gazebo was to be included in the design of the new flood defence wall. It may be that when the new flood defence wall is designed there may be scope to allow access to the gazebo from within the site. If this is not possible, the alternative would be to move the gazebo from its current location to within the site and the main Custom House side of the flood defence wall. It is considered that these matters can be secured by planning condition and would preserve the Gazebo for future occupiers and preserve this heritage asset without having a detrimental impact on other listed buildings within the site, or neighbouring listed buildings or the Conservation Area.

New build terrace - A new terrace of three dwellings is proposed to be erected to the south of the Boathouse. It is considered that a new building in this location would be acceptable given its distance from Custom House and that it would enclose the western side of the site responding to the way the outbuildings do this currently on the eastern side. The building is sufficiently distanced from Custom House such that subject to details on design and materials it is considered that the new terrace of three dwellings would fit into the context of the site in a sympathetic manner such that the setting of the main grade II listed Custom House and Gazebo and the other curtilage listed buildings on the site would be protected, as would the setting of the surrounding listed buildings and the character and appearance of the Riverside Conservation Area would be protected. Compared to the original approval under Listed Building Consent ref. 20210758 there are changes proposed in respect of re-positioned walls and the installation of an additional rooflight; these changes are considered acceptable.

It is considered that the submitted Heritage & Conservation Strategy and the Heritage Statement carefully detail the various levels of heritage significance across the site and explain how the proposals have been designed within this. Custom House and the Gazebo (both grade II listed) having the highest significance and accordingly the changes to those elements are very minor and sympathetic to the architectural and historic interest of those buildings. There is more being proposed to the outbuildings as these are proposed to be extended but given that they are of lesser heritage significance than the main grade II listed Custom House and Gazebo there is the flexibility to carry out such alterations without causing any significant harm. The removal of the mid twentieth century part of the workshop is acceptable and the changes to the remaining part of the workshop and the Boathouse would be minor and again due to their relatively low heritage significance when compared to Custom House and the Gazebo, there is the scope to carry out such minor changes in heritage terms.

The proposals would alter the existing buildings by way of alterations and/or extensions and compared to the existing situation there would be some limited harm caused to the buildings as they would not remain exactly as they are currently. However, it is considered that the level of harm on the historic environment would be very minor and therefore that harm would be less than substantial. In such circumstances the NPPF (2024) at paragraph 215 advises that the harm is to be weighed against the public benefits of a proposal including where appropriate, securing its optimum viable use. In this case the site is vacant, and the proposal would bring the site back into use, albeit as a residential use for 27 flats, rather than a commercial use. In addition, the proposal would deliver economic benefits from the construction and occupation of the development and the restoration of the listed buildings.

In respect of listed building and Conservation Area matters it is therefore considered that the proposal would not have an adverse impact on the main grade II listed Custom House and Gazebo or the curtilage listed buildings on the site and their setting or the setting of the surrounding listed buildings and would preserve the character and appearance of the Riverside Conservation Area. In this respect the proposal would be compliant with Policies CS19 and CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR).

It is prudent to note that the proposal would require conditions to secure further details in respect of materials and architectural detailing. In the original planning and listed building consent application refs. 20210757 and 20210758 all of the details required were put on the planning application ref. 20210757 in order to not 'double up' conditions on both the planning permission and the listed building consent. In the case of the current variation of condition (ref. 20240687) and listed building consent application (ref. 20210686) it is considered that the details that are required should again be attached to the variation of condition application ref. 20210687 so as not to double up the conditions. Therefore, it is recommended that this listed building consent application if approved would have the time condition and approved plans and the variation of condition application would then have all of the conditions requesting details.

Any Other Material Planning Considerations

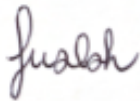
None.

Conclusion

The proposal would respect the architectural and historic interest of these listed and curtilage listed buildings and their setting, the surrounding listed buildings and the proposal would preserve or enhance the character and appearance of the Riverside Conservation Area and the proposal is therefore compliant with local and national planning policy.

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:	4 March 2025	Dated:	05 March 2025