

Delegated Report

Listed Building Consent Application

Planning Application No: 20221192

Location: RNLI Store Royal Terrace Pier Royal Pier Road Gravesend

Description: Application for Listed Building Consent for the repairs and redecoration to existing cast iron lighthouse turret, installation of below-deck protection and installation of fall arrest system.

Applicant: Mr Michael Atkins, Port Of London Authority

Site Visit Date: Desk top

Submitted Documents/Plans

- Application form;
- Drawing no. DET-101 – Pier Head Light Turret Plans & Elevations Proposed;
- Drawing no. DET-102 – Pier Head Light Turret Elevations Proposed;
- Drawing no. DET-103 – Pier Head Light Turret Section A-A Proposed;
- Drawing no. DET-210 – Pier Head Light Turret Cupola Roof Details Existing & Proposed;
- Drawing no. DET-211 – Pier Head Turret Plinth Base Proposed Details;
- Drawing no. DET-212 – Pier Head Turret Plinth Infill Panels Proposed Details;
- Drawing no. DET-215 – Pier Section & Elevation Fall Arrest System;
- Drawing no. EX-001 – Location & Site Plans Existing;
- Drawing no. EX-104 – Pier Head West & East Elevations Existing;
- Drawing no. EX-105 – Pier Head & Approach Section A-A Existing;
- Drawing no. EX-106 – Pier Head & Approach Sections B-B & C-C Existing;
- Drawing no. EX-107 – Pier Head Pigeon Netting Plans & Sections;
- Drawing no. EX-201 – Pier Head Light Turret Plans, Elevation & Section Existing;
- Drawing no. GA-103 – Pier Floor Plan – Promenade Level Fall Arrest System;
- Drawing no. RTP/C/004 – Royal Terrace Pier Refurbishment;
- Heritage Statement;
- Heritage Statement Appendix A;
- Heritage Statement Appendix B; and
- Planning Statement and Design & Access Statement.

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS18 – Climate Change
- CS19 – Design and Development Principle

- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

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

Paragraph 33 of the NPPF (2021) 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 (2021), 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 Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

National Planning Policy Framework (2021)

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 Conservation Officer

I've looked through the application and note that my comments below appear not to have been addressed in the 20221192 application bundle, namely the location of the fall arrest system on the front face of the gutters, and the corrugated panels to the light turret.

That said, and on balance, these are minor details and so would not harm the significance of the listed building.

The documents are thorough and the only condition would be to see a written specification covering the work, as this appears to be missing from the application submissions.

GBC Conservation Officer

That's helpful to see the comments from the architect and offers an acceptable justification for the approach

adopted.

No adverse comments on these two matters of detail.

Neighbouring properties

Site and press notice – overall consultation expiry date was 09.12.2022 – no comments received.

Officer's Analysis

The principle consideration in the assessment of the application is the impact on the architectural and historic interest of this grade II listed building.

The proposal relates to a number of repair works which include repairs and redecoration to the existing cast iron lighthouse turret, installation of below-deck protection and installation of a fall arrest system.

Repairs and redecoration to the existing cast iron lighthouse turret

This is said to be in urgent need of repair and does appear to be in poor condition. The works include the weather vane being removed, existing copper sheet roof replaced like-for-like with new copper sheeting, the cornice being repaired and redecorated including the cast iron window lintels, mullions and cills, the turret plinth cast iron posts, lintels and cill panels with new corrugated steel sheet infill panels to match existing. The works are considered to be needed to repair the structure and will enhance its appearance and restore it for the future. The Conservation Officer had raised concerns regarding the corrugated panels to the light turret. This was raised with the applicant who provided justification from the architect and after reviewing comments provided from the architect for why metal has been chosen the Conservation Officer now finds the choice of cladding acceptable. Metal sheeting has been chosen rather than timber for a number of reasons including precedent for using corrugated iron sheets on the pier, historic evidence that lighthouses never had timber panels as an exterior cladding, the existing plywood panels appear to be replicating metal sheets, poor condition of timber cladding contributes to deterioration of the lighthouse and the lighthouse is hard to access. The works to the lighthouse are therefore considered acceptable.

Below deck protection

New anti-bird netting is proposed to be installed to the soffit excluding moving gangway, side galleries and soffit of roof with zip access provided to galleries; netting is to be 316 grade stainless steel. Stainless steel netting is also proposed as a complete enclosure with sides, spanning between the two main iron girders from the bays on the line of the stairs to the river end of the pier which will be supported on new stainless steel perimeter carrier wires and cleats. There are no objections to these elements which are considered acceptable.

Fall Arrest System

These works are said to be required under Health and Safety Legislation in order to provide a safe means of accessing the external façade of the building for maintenance such as window and gutter cleaning. It is proposed to add a continuous horizontal rail mounted on the outer vertical face of galvanised steel box gutter to provide access to the perimeter of the pier with access to the rail from land at the east end of the pier on the north and south sides and via eight transfer anchor points and windows. It will be formed of 3m Unirail system black powder coated aluminium rail in 3m long sections attached to the front face of black finish galvanised steel gutter. The Conservation Officer had concerns at the attachment of the support cable to the front face of the guttering and advised that above or behind would be preferable. This was raised with the applicant who provided justification from the architect as to why the front face of the guttering had been chosen. After a review of the information i.e. - that there are ties across the top of the gutter at regular intervals which would prevent the support cable running inside the gutter and that running the cable above and supported on brackets would not be sufficiently stable, the Conservation Officer advises he finds the placement of the cabling on the front of the guttering acceptable.

In general the Conservation Officer has stated that a Schedule of Works will be required and he is happy for this to be secured by planning condition, this would by its nature need to be a pre-commencement condition and this has been agreed by the applicant.

It is therefore considered that subject to this the proposed works would not cause any harm to the architectural or historic interest of this grade II listed building and would repair and secure its use as a working pier for the future. By extension the works would also preserve the character and appearance of the Riverside Conservation Area. In respect of listed building and conservation area impact the proposal is therefore considered compliant with Policies CS19 and CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR).

Any Other Material Planning Considerations

None.

Conclusion & Recommendation

The proposal would not cause any harm to the architectural or historic interest of this grade II listed building and would preserve the character and appearance of the Riverside Conservation Area.

Recommendation: Permission

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

Case Officer:	Ms Rebecca Harrison	Team Leader:	Richard Hart
Signed:	<i>Rebecca Harrison</i>	Signed:	<i>R Hart</i>
Dated:	5th January 2023	Dated:	5th January 2023