

20251136

Our ref 212458

The Society for the Protection of Ancient Buildings

Your ref 20251136

Elizabeth House, The Street, Meopham, Gravesend, Kent DA13 0AJ

Application for Listed Building Consent for the changes to existing ground floor rear extension. Removal of existing ground floor WC/Utility room rear extension. Internal alterations and refurbishment.

Dear Rebecca

Thank you for notifying the SPAB of the above application affecting this 17th-century Grade II listed building. Having carefully reviewed the application documents, we have a number of concerns regarding the proposals as they currently stand and therefore wish to register our objection.

The reasons for our objection can be summarised as follows:

- Insufficient information to fully understand the building's significance and the potential impact of the proposals.
- Inadequate detail in the supporting documentation (drawings and reports).
- Several proposals appear unlikely to preserve the building's special architectural or historic interest and would result in harm to its significance.
- The application lacks clear and convincing justification for this harm, and no public benefits have been demonstrated.

We expand on these points below.

Heritage Statement

The Heritage Statement (HS) is brief and lacks sufficient detail. Additionally it claims incorrectly that Elizabeth House was designed as a workhouse—a role it only served between 1724 and 1834—despite dating from the 17th century. Later uses as a shop, post office, and residential accommodation are also significant but not properly addressed. While the HS refers to surviving early fabric, it fails to identify its location and repeatedly asserts that no harm will result without justifying the loss of historic material. A thorough assessment of the building's evolution is essential to understand its significance and evaluate the impact of the proposals.

This requirement is set out in Paragraph 207 of the National Planning Policy Framework (NPPF), which states that applicants must describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 212 indicates that

great weight should be given to the conservation of designated heritage assets, and Paragraph 213 requires clear and convincing justification for any harm or loss of significance. In our view, these requirements have not been met.

With regards to the proposed works we offer the following observations and comments.

Windows (EWG–03 & 04)

The front elevation windows are distinctive and make an important contribution to the building's historic character. Their differences also suggest that internal spaces may have served different purposes and are evidence of the building's historic uses. We strongly object to the proposed replacement of the two windows and the enlargement of their openings to replicate adjacent sash windows.

Rear Elevation

The proposals include demolishing the rear lean-to and the end wall of the larger extension. If these structures are modern, we would not object to their loss. However, the treatment of the rear elevation still requires justification. Large areas of glazing and a new opening in the earliest part of the building lack rationale, and there is no justification for the loss of historic fabric.

Internal Works

The proposals include demolishing partitions, raising and levelling floors, and installing underfloor heating. A building's special interest lies in its historic fabric, plan form, and character—none of which have been assessed. For example, uneven floors often contribute to historic character; any proposal to level them must be supported by a technical requirement and sufficient justification.

Structural Details

The application lacks sufficient information to justify the proposed replacement of the existing timber post with a steel post. This is the only structural change identified, yet no explanation is provided regarding its necessity or impact on historic fabric. If the existing beam is described as 'sagging', this suggests that further investigation may be required to assess its condition rather than simply supporting it differently. Any decision should be based on a structural report outlining the problem and exploring repair or retention options. We strongly recommend that the applicant engages a CARE-registered structural engineer to provide a detailed assessment and justification, ensuring that any intervention is appropriate, proportionate, and minimises loss of historic material.

Rooflights

The proposed rooflights may be acceptable, but detailed information is needed to show their impact on the historic roof structure.

Dry Lining

The drawings also describe dry lining, which is not always appropriate for historic structures and risks trapping moisture, leading to decay. A detailed specification should explain the full extent of works and the materials and methods to be used, including thermal upgrades, changes to doors and windows, and works to floors, walls, and ceilings. The involvement of a conservation-accredited architect in preparing this specification is strongly recommended. Without this information, it is impossible to understand the impact on the building's special interest.

Summary

For the reasons outlined in this response, we object to the proposals on the grounds that they are contrary to the NPPF and recommend that the applicant either:

- Withdraw the application and seek advice from the Council's Conservation Officer with a view to resubmitting a conservation-led scheme; or
- Revise the current application to provide the requisite information and clear, convincing justification.

Should the application not be withdrawn or revised, we advise refusal.