Gravesham Borough Council

Delegated Report

Planning and Listed Building Consent Applications

Planning Application Nos:	20250285 20250286
Location:	27 Shrubbery Road Gravesend Kent DA12 1JW
Description:	20250285 - Replacement of front boundary wall and railings with original style 'wrought' iron railings and gate. 20250286 - Application for Listed Building Consent; replacement of front boundary wall and railings with original style 'wrought' iron railings and gate.
Applicant:	Mr Andy Mills
Site Visit Date:	17/04/2025

Submitted Documents/Plans

- Covering Letter
- Application form;
- Railings Details – Proposed;
- Block Plan – Existing and Proposed;
- Drawing no. 27-010-01 – Front & Rear Elevations - Existing;
- Site Location Plan;
- Location of Trees;
- Design and Access Statement;
- Photos of Wall and Railings Details – Existing.

N.B - Originally as submitted the applicant proposed to remove the internal basement wall but upon advice from the Local Planning Authority (LPA) that this would not be supported due to the harm to the architectural and historic importance of this listed building, the applicant withdrew this element from the proposal by way of their e-mail of 06/08/2025. The applicant also agreed to amend the application descriptions so that they now only include the proposed front boundary railings; the reference to the removal of the internal basement wall has been removed. The proposal in these planning and listed building consent applications is therefore purely only for the installation of original style 'wrought' iron railings and gate.

Removed from application:
~~Drawing no. 27-050-02 – Side Section;~~
~~Drawing no. 27-065-01 – Plot area Proposed;~~
~~Drawing no. 27-060-01 – Plot area Existing;~~
~~Drawing no. 27-040-01 – Lower Ground Floor Plan – Proposed;~~
~~Drawing no. 27-030-01 – Lower Ground Floor Plan – Existing;~~
~~Drawing no. 27-020-02 – Floor Plans – Existing;~~
~~Internal Photos of Lower Ground Floor;~~

Relevant Planning History

Reference	Description	Decision	Decision Date
19960264	Application for Listed Building consent for the erection of 0.9m-1m high wall mounted railings and gate to replace the existing front boundary wall.	Permitted	28.07.1996

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.

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.

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, the Council has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architect or historic interest which it possesses.

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

- Windmill Hill Conservation Area Character Appraisal
- Management Plan – Gravesend's 19th Century Suburban Conservation Areas

Consultations, Publicity and Representations

Consultees

Conservation Officer

Thanks for forwarding the case history, which confirms similar alterations were carried out to adjacent buildings. The building forms part of a terrace of two-up two-down terraced buildings with basement. This form of building originally was entered at ground or semi ground level, with the living room at the front and a kitchen at the rear. The basement was then for storage or laundry or other non-living areas.

It appears from the plans submitted, that the existing upper ground floor dividing wall between the front and back rooms has already been removed. Only the original floor plan room layout survives at lower ground/basements level. Alterations to other buildings means that this is becoming a rare survivor of the plan form.

The enhancement of the front boundary railings is to be welcomed and will enhance both the terrace and the conservation area.

Loss of original walls will result in harm to the significance of the listed building and would require a strong justification for the harm caused. Further removal of dividing walls in the application building would be contrary to current local and national planning policy where refence must be made to the NPPF.

On balance the proposals will result in less than substantial harm, but great weight must be given to that harm, being the removal of internal original walls. As there are no public benefits to weigh against the less than substantial harm that the proposal would result in, it is concluded that the proposals are contrary to local and national planning policy.

No response from:
- National Amenity Societies

Neighbouring properties & Publicity

20250285 - 4 surrounding properties were consulted plus site and press notices – overall consultation expiry date was 09.05.2025 – no responses received.

20250286 - Site and press notices – overall consultation expiry date was 09.05.2025 – no responses received.

Officer's Analysis

The application site consists of a three storey building situated on the northwestern side of Shrubbery Road in use as a residential dwelling.

The building is grade II listed and located in the Windmill Hill Conservation Area.

The proposal is for planning and listed building consent for replacement of the front boundary wall and railings with original style 'wrought' iron railings and gate.

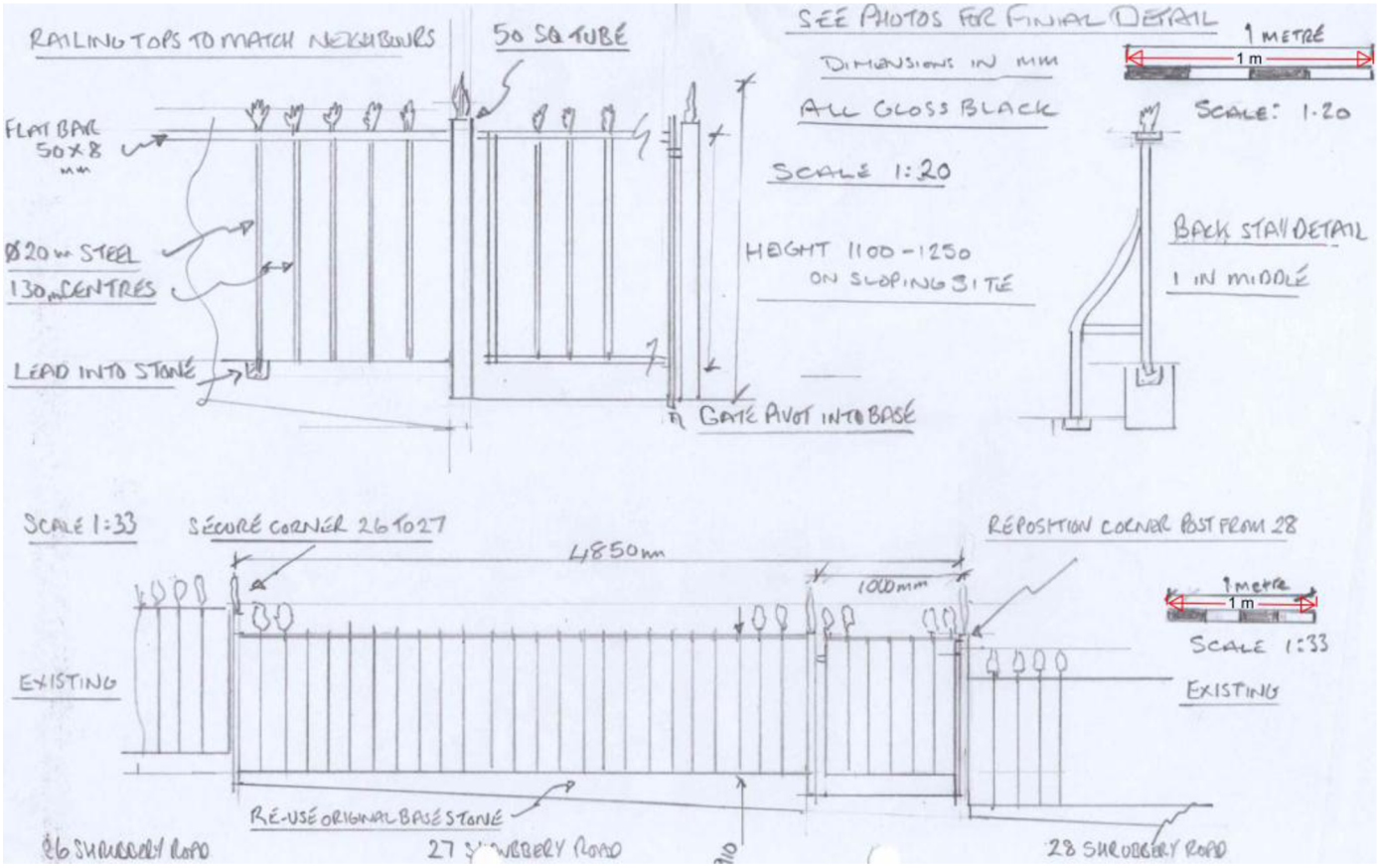
The principal consideration in the assessment of this application is whether the proposal would protect the setting of this grade II listed building and preserve or enhance the character and appearance of the Windmill Hill Conservation Area.

At some point in time the original front boundary wall and railings have been removed (this appears some time ago given the style of the existing wall and railings):



The removal of the current modern wall and railings is therefore welcome.

The proposed front boundary wall and railings are considered acceptable. They are of traditional design and materials with the railings to be individually set into the dwarf wall, backstays and the base stone under the existing wall will be re-used:



It is stated in the application that the railings will match those at no. 28 Shrubbery Road in respect of finials and gate design:

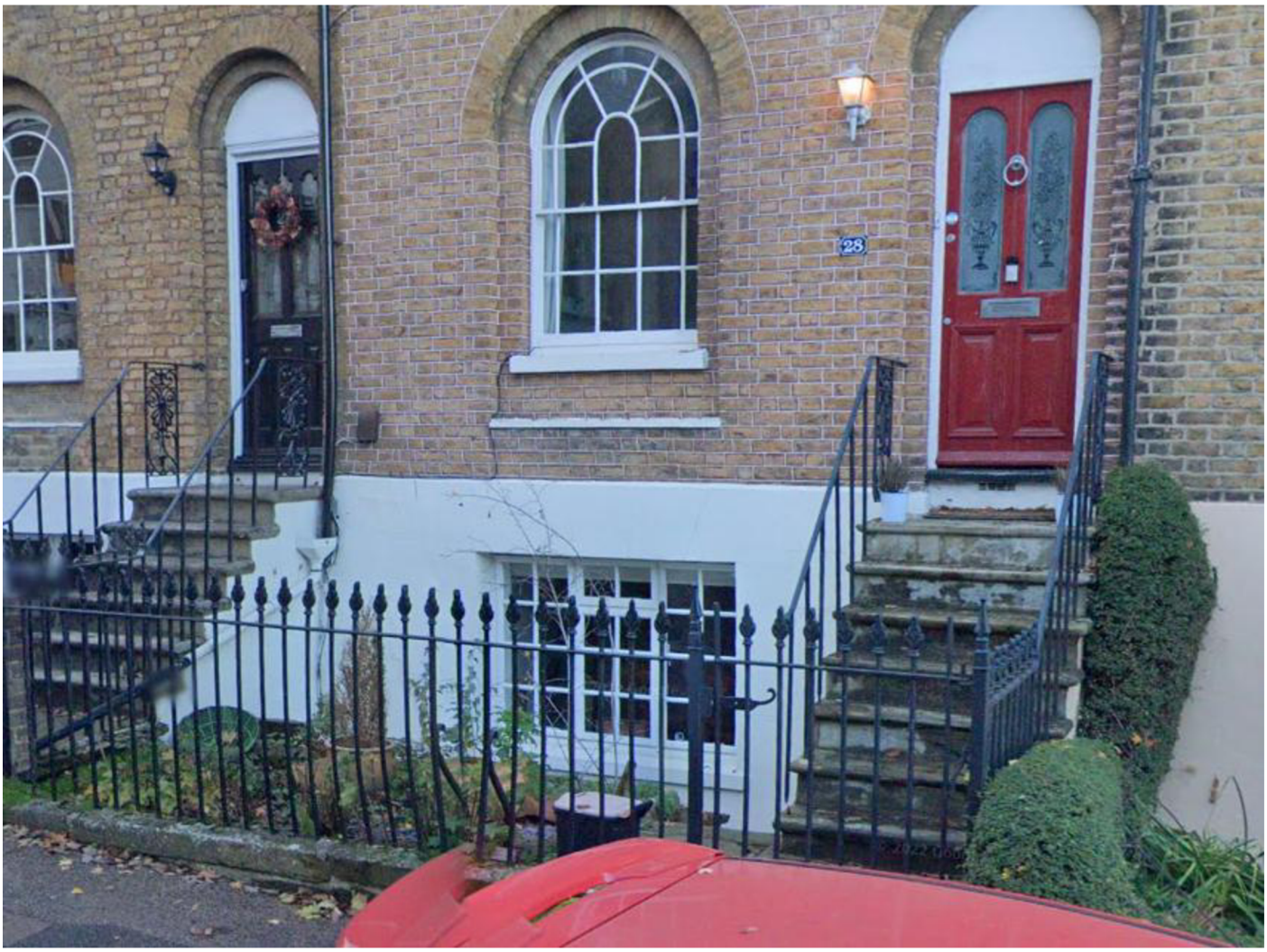








The railings at no. 28 Shrubbery Road are traditional and completely acceptable to replicate and this can be conditioned, should permission be forthcoming, that the finials and gate design are to match no. 28's exactly. No. 28's railings are shown below:



It is considered that the removal of the existing wall and railings and installation of new traditional railings is welcome and would respect and enhance the setting of this grade II listed building and the character and appearance of the Windmill Hill Conservation Area. As such the proposal is compliant with Policies CS19 & CS20 (LPCS) and saved Policies TC2 & TC3 (LPFR).

Any Other Material Planning Considerations

None.

Conclusion

The proposal would respect and enhance the setting of this grade II listed building and the character and appearance of the Windmill Hill Conservation Area and is compliant with local and national planning policy.

Recommendation

20250285 – Permission

20250286 – Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	**Team Leader:**	Mrs Faye Walsh
Signed:	[redacted]	**Signed:**	[redacted]
Dated:	8th September 2025	**Dated:**	09 September 2025