

Your ref 20251136

The Society for the Protection of Ancient Buildings

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 revised application affecting this 17th-century Grade II listed building. Having carefully reviewed the amended submission, we regret that our concerns have not been sufficiently addressed and we therefore remain unable to support the application.

We refer to our earlier objection dated 2 December, in which we requested further information to enable a proper understanding of the building's significance and the impact of the proposed works. In particular, we sought a clearer and more analytical assessment of the building's evolution, identifying its principal phases of development and the contribution made by both early and later alterations to its significance.

While we welcome the submission of a fuller Design and Access and Heritage Statement, the revised documentation continues to fall short of providing a meaningful assessment of significance. It places undue emphasis on an assumed early form of the building while diminishing later phases of development, despite these forming an integral part of the building's historic evolution and evidential value.

The building dates from around 1690 and was adapted for use as a workhouse between 1724 and 1834, as recorded in the listing description. However, the revised documentation continues to describe the building's original use as a workhouse, despite this post-dating its construction by some 34 years. The building was subsequently used as a shop and post office until 2003, when it was converted back to a dwelling.

A clearer understanding of the building's development and significance is therefore required in order to assess the impact of the proposals on its special architectural and historic interest. This is a requirement of the National Planning Policy Framework (NPPF), to which we draw particular attention:

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

With regard to the proposals, we offer the following observations:

Windows

The existing windows on the principal elevation are not uniform; their variation establishes a clear hierarchy that reflects the building's historic use, particularly the prominence of the former shop entrance. This hierarchy is an important aspect of the building's character and evidential value.

The revised proposals continue to seek the replacement and standardisation of the windows, which would result in the loss of a later but meaningful phase of the building's development. In addition, the proposed introduction of a new full-height window to the rear elevation, within the location of an earlier sash, would require the removal of historic brickwork below the existing opening. These interventions would cause harm to the building's special interest for which no clear and convincing justification has been provided.

Floors

The proposals include the introduction of underfloor heating and the raising and levelling of floors throughout the building. Irregular floors are often a key component of the character and evidential value of historic buildings. A more detailed assessment of the floor structures is therefore required to establish significance and to understand the potential harm arising from the proposed works.

If historic floorboards survive beneath modern finishes, these should not be lifted or disturbed. The cumulative impact of raising floor levels on associated historic features — including skirtings, door thresholds, and joinery — also requires further assessment, and any resulting harm must be clearly and convincingly justified.

Walls and Structure

The proposals include the removal of cementitious plaster and the introduction of wood-fibre insulation and lime plaster. While we do not object to this approach in principle, the method statement refers to plaster being "hacked off," which suggests an overly aggressive technique that risks damaging historic fabric beneath.

We also note the presence of damp within the building. We strongly recommend that the underlying causes are investigated and resolved prior to the installation of any internal wall insulation, as this may otherwise trap moisture and exacerbate the problem.

We would also expect to see detailed drawings and specification regarding the proposed wall insulation build-up in order to assess its impact on the historic fabric.

Reference is also made to a sagging beam and to further propping having been recommended by structural engineering advice; however, no detailed structural report or drawings have been submitted. Any structural intervention should be informed by a detailed assessment prepared by a CARE-registered structural engineer, with a clear emphasis on minimal intervention.

Other Works

The proposals include paint stripping; further information is required to establish the technical justification for this work. Details of the proposed methods should be provided, including a method statement explaining how historic timber will be protected.

The proposals also include the installation of new rooflights. Further information is required to enable an assessment of their impact on the historic roof structure.

Reference is also made to the relocation of the safe. If the safe is of significance, this requires further assessment, as its location may also contribute to the building's significance. Further information is therefore required to understand the impact of this proposal.

We also note that a number of the proposed interventions appear to be driven by the aim of achieving compliance with Building Regulations. While the need to improve performance and safety is acknowledged, a blanket or standardised approach to compliance is not always appropriate for historic buildings. Works to listed buildings should be informed primarily by an understanding of significance and the principle of minimal intervention, with Building Regulations applied in a flexible and proportionate manner where justified.

In summary, while some of the proposals could be supported in principle, there remains an insufficient understanding of the building's significance and of how the proposals would affect its special architectural and historic interest. As currently presented, some of the proposed works would result in harm, for which insufficient justification has been provided. In our view, the application fails to meet the requirements of the NPPF and we therefore recommend that it be withdrawn to allow the above matters to be addressed.