



HERITAGE STATEMENT

44 High Street
Gravesend
Kent, DA11 0AY

Planning & Heritage Statement

1.0 Introduction

1.1 This Heritage Statement has been prepared on behalf of Mr Ali Rana in support of this planning application for the Conversion of the property from sui generis public house to sui generis takeaway at 44 High Street, Gravesend, DA11 0AY.

1.2 In addition to the application form and certificates, the following documents have already been submitted;

Application plans:

- Block Plan
- Location Plan
- Floor Plan Existing
- Floor Plan Proposed
- Elevations
- Covering Letter

2.0 Site and Surroundings

2.1 The application site is located on the western side of High Street and is within a building of three storey design.

2.2 The site is located within Gravesend Town Centre within The Town Conservation Area as defined by the Gravesham Local Plan First Review (November 1994) Proposals Map.

2.3 The building is currently vacant and was last used as a Sui Generis Public House (Room Forty Four) on ground floor with cold storage for barrels in the basement. There is a vacant residential dwelling on the first and second floors.

2.4 The building is within the High Street and Queen Street Conservation Area.

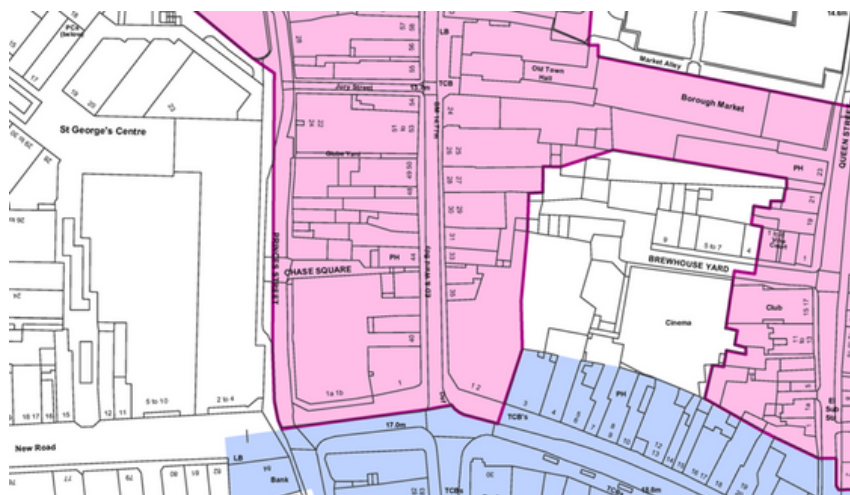


Image of Conservation Area Boundary

3.0 Planning Policy Context

3.1 Section 54A of the 1990 Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004, if require that, when deciding under the Planning Acts, the determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.

3.2 The development plan for the site comprises the Gravesham Core Strategy (September 2014) and the saved policies of the Gravesham Local Plan First Review (1994). The following policies of and were taken into consideration in the formulation of this application: Core Strategy (September 2014) Policy CS 19 – Design & Development Principles Policy CS20 Heritage and the Historic Environment. Gravesham Borough Council Gravesend 19th Century Suburban Conservation Areas Management Plan 2009) Windmill Hill Conservation Area Character Appraisal (2009) Gravesham Local Plan (First Review) - 1994 Saved Policy TC3 – Developments affecting a Conservation Area Saved Policy P3 - Parking Standards National Planning Policy Framework (NPPF) (adopted February 2019)

3.3 National planning policy is enshrined within the revised National Planning Policy Framework (NPPF) issued in February 2019 and its accompanying revised the Planning Policy Guidance (PPG). The PPG seeks to set out how to implement the strategic vision contained within the NPPF.

3.4 With regards to decision-taking, the revised NPPF advises that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development and should look for solutions rather than problems. Decision-takers at every level should seek to approve applications for sustainable development where possible (paragraphs 186 and 187).

3.5 Paragraph 7 of the NPPF states that, “the purpose of the planning system is to contribute to the achievement of sustainable development”. It goes on at paragraph 8, that there are three dimensions of sustainable development as: economic, social and environmental. Paragraph 10 of the NPPF states that a “presumption in favour of sustainable development’ which is at the heart of the Framework to ensure that sustainable development is pursued in a positive way.

3.6 Paragraph 124 says that the Government attaches great importance to the creation of high-quality buildings and that good design is a key aspect of sustainable development, which creates better places in which to live and work. This is indivisible from good planning and should contribute positively to making places better for people. Paragraph 127 states that planning policies and decisions should ensure that developments: -

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- Are sympathetic to local character and history Including surrounding built environment and landscaped setting
- establish a strong sense of place, using streetscapes and buildings to create attractive, welcoming and distinctive places to live, work and visit;
- create places that are safe, which promote health and wellbeing with a high standard of amenity for existing and future users.

3.7 Paragraphs 130 emphasise that developments of poor design should be refused but where design accords with plan policies it should not be used as a valid reason to object to development.

3.8 However the main policy implications for the proposal relate to the preservation and enhancement of established heritage assets and the High Street and Queen Street Conservation Area generally. Paragraphs 184 to 201 of the NPPF deal with conserving and enhancing the historic environment with much emphasis on "significance", defined in Annex 2 as: "The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

3.9 Paragraph 190 of the NPPF places a duty on the Local Planning Authority (LPA) to require an applicant to describe the significance of any heritage assets affected by a proposal, providing a proportionate level of detail. The effects of any development on a heritage asset therefore need to be assessed against the four components of its heritage significance: its archaeological, architectural, artistic, and historic interests.

3.10 Paragraph 191 requires LPAs to identify and assess the "the particular significance of any heritage asset". This should be taken into account when considering the impact of a proposal on a heritage asset, including by development affecting its setting. Paragraph 192 is particularly relevant, in requiring LPAs to take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Paragraph 194 applies specifically to designated heritage assets. It states that great weight should be given to their conservation, and it requires a proportionate approach (i.e. the more important the asset, the greater the weight attached to its conservation). Paragraph 195 adds further to this by emphasising the importance of ensuring that any alterations or modifications are in keeping and character with the Conservation area and ensure the preservation of the heritage asset itself.

4.0 Planning Considerations

Principle of Development

4.1 The NPPF sets out the Government's planning policies for England and how these should be applied. Paragraph 2 notes that planning law requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development and Paragraph 8 sets out the three objectives of achieving sustainable development being economic, social, and environmental. In terms of decision-making, Paragraph 11 states that where a development accords with a local plan, applications should be approved without delay. Where a plan is absent, silent, or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or specific Gravesham Borough Council policies in the Framework indicate development should be restricted. The NPPF further goes on to state at Paragraph 38 that LPAs should approach decisions on proposed developments in a positive and creative way and decision-makers at every level should seek to approve applications for sustainable development where possible. Impact of the Development on the Conservation Area

4.2 In respect of the impact on the character and appearance of the area, the property is within the High Street and Queen Street Conservation Area.

4.3 The proposed conversion has been designed in a way that the original fabric of the building has not been altered. The building is currently vacant, and the proposal will significantly help in enhancing and bringing this building back into use. There would be no changes or alterations made to the external façade of the building. The detail provided clearly shows that the site can accommodate the proposed development without having any detrimental effect on the street scene or the amenity of neighbouring properties. It will be a positive enhancement of the conservation area rather than leaving the building vacant.

4.4 Paragraphs 192, 194 and 195 of the revised NPPF all look at conserving and enhancing the historic environment with specific emphasis at restoring and preserving heritage assets. We are satisfied that the application site is clearly an asset worthy of preservation and restoration, and the application proposal will see the building provided with additional residential dwellings to offset the Council's shortfall and ensure the long-term viability of the building.

4.5 As per the 'Planning Guidance on Waste Collection Requirements' (version August 2024), the flat on the first floor will be storing refuse, recycle and food waste with additional 5ltr caddy in the flat in a compartmentalised and enclosed storage. The residence will be storing the waste in the storage and once a week outside the property (Windmill Street) the waste will be taken by the residence for collection. Meanwhile, the commercial property will have access to the waste storage located at the back yard and then taken to the front of the property for the weekly collection.

Impact on Neighbouring Properties

4.5 Paragraphs 192, 194 and 195 of the revised NPPF all look at conserving and enhancing the historic environment with specific emphasis at restoring and preserving heritage assets. We are satisfied that the application site is clearly an asset worthy of preservation and restoration, and the application proposal will see the building completely renovated without affecting the continuity of the street scene.

4.6 Consideration has been given to the impact of the proposal on adjacent properties in High Street regarding privacy and noise. Policy CS19 of the Core Strategy requires new development to safeguard the amenity including potential noise escape. It is not anticipated that the proposal would result in an increase in noise other than the normal coming & going of tenants.

4.7 The upper floors are already in use as a residential flat (albeit now vacant) and the only change would relate to the ground floor and basement. There would be nothing to prevent the continued use of the upper floors for residential purposes. The impact of noise and air quality would therefore be limited.

5.0 Conclusion

5.1 The applicants have taken on board all the Council's and National policies to provide a sustainable solution both to the need to provide additional services and facilities. The prospective layout and design is in keeping with the good design principles outlined in the NPPF and would not be out of character with the area and has no detrimental effect on the residential amenities of its neighbours.