



NOISE AND VIBRATION STATEMENT

Full planning application Part-retrospective change of use and conversion of the former offices to five self-contained flats, including internal alterations; formation of a front-to-rear access passage; installation of ramps and security gates; enlargement of the rear lightwell; remedial works to the flat roof; installation and replacement of windows and doors; erection of a Juliet balcony, boundary fencing and railings and gates to the front and rear lightwells; and provision of cycle and refuse storage.

Site	195 Parrock Street, Gravesend, Kent DA12 1EW
Application	Full planning application submitted at the Council's request
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Date	15 August 2026
Document status	Planning screening and proportionality statement - not a technical acoustic impact assessment

1. Purpose and status of this statement

This statement responds to a validation requirement for a Noise and Vibration Impact Assessment. It considers whether the scope of the current application, the planning history and the identified receiving environment justify measured acoustic and vibration work at validation stage.

No sound or vibration measurements, acoustic calculations or modelling have been undertaken. The statement does not assert numerical compliance with BS 8233:2014 or ProPG and is not presented as a report by an acoustic consultant. Its purpose is to support a proportionate planning judgement about whether such a report is reasonably required for this particular application.

2. Application and planning context

The site comprises a listed former bank building subsequently used as offices. Planning permission ref. 20200663 was granted on 30 October 2020 for its conversion to four self-contained flats with associated works. That permission is relevant planning history only. Gravesham Borough Council has requested that the current proposal be submitted as a full planning application rather than, as currently within your department, a S.73 application for minor amendments, and this statement is prepared solely for this current standalone application.

The earlier permission was granted without a condition requiring a noise survey, acoustic mitigation scheme or vibration assessment. It is cited only as planning history; the present application is a standalone full planning application and must be determined on its own merits.

The present application seeks full planning permission for the four-flat conversion and the associated works shown on the submitted plans. The proposal retains the existing building and its relationship with Parrock Street. It does not increase the four residential units, move the building towards a noise source or materially intensify occupation relative to the development previously authorised.

This Noise and Vibration Screening and Proportionality Statement forms part of the Council-requested full planning application and addresses the development shown in the current submission.

The adjoining half of the paired building is already in residential use. This does not prove compliance with contemporary internal acoustic criteria, but it is relevant contextual evidence that residential occupation is established in the immediate built form and that the location is not inherently incompatible with housing.

3. Existing acoustic and vibration context

3.1 Road traffic

The building fronts Parrock Street in an urban town-centre setting. The road is subject to a town-centre speed restriction. A bend in the road before the building moderates approach speeds, while traffic signals lie beyond the building. Those physical features reduce the likelihood of sustained high-speed pass-bys.

The traffic signals may nevertheless produce intermittent braking, queuing and acceleration events. This statement therefore does not suggest that the facade is unaffected by road traffic. It concludes instead that road traffic is the only identified source potentially requiring consideration and that the need for technical work should be judged against the previous permission, the unchanged receptor relationship and the nature and scale of the current full application.

3.2 Other environmental noise sources

No particular industrial operation, entertainment venue, fixed commercial plant, delivery yard or other source has been identified by the Council as the reason for requiring the assessment. No new noise-generating external mechanical plant or extraction equipment forms part of the full application. There is also no retained commercial use above or below the proposed dwellings requiring an assessment of separating construction under the mixed-use provision of the local validation list.

3.3 Vibration

The application material identifies no railway, industrial process, piling operation, blasting, deep foundation work or other credible source of material operational or construction vibration affecting the proposed dwellings. Ordinary building works associated with adapting the existing building do not, without a specific high-vibration method or source, establish a reasonable basis for baseline vibration monitoring or predictive modelling.

No information has been provided identifying unusually high heavy-goods-vehicle activity, a material road-surface defect or another site-specific mechanism capable of causing adverse building vibration. On the evidence presently available, vibration should be screened out.

4. Policy and validation framework

4.1 National policy

Paragraph 198 of the National Planning Policy Framework requires new development to be appropriate for its location, to minimise potential adverse noise impacts and to avoid noise giving rise to significant adverse effects on health and quality of life. Paragraph 200 applies the agent-of-change principle where an existing business or community facility could have a significant adverse effect on new development.

Planning Practice Guidance explains that noise is relevant where development may create additional noise or would be sensitive to the prevailing acoustic environment. Assessment depends on source, level, time, frequency, character and context; there is no single numerical test for every site.

4.2 Local validation requirement

Gravesham's accessible Local List states that a Noise and Vibration Impact Assessment applies, among other circumstances, where a noise-sensitive use is proposed near an existing noise-generating use. It expects background monitoring, prediction against appropriate standards and mitigation, and states that a full assessment should be prepared by a suitably qualified acoustic consultant.

The accessible document says its substantive content remains that of the 2020 published list. Irrespective of its procedural status, national guidance requires each local information request to be **proportionate**, reasonable having regard to the development's nature and scale, and related to a matter reasonably capable of being material to determination. The broad category cannot be applied automatically to every road-facing residential conversion.

This statement addresses the prior question: whether the Council has identified a sufficient site-specific risk to justify commissioning that evidence for this particular full application.

5. Screening assessment

5.1 Noise generated by the development

The previously authorised and currently proposed use is residential. The application includes no pub, club, industrial operation, commercial process, delivery yard or comparable noise-generating use. Domestic activity from the four flats would not be materially intensified relative to the 2020 permission. Operational development-generated noise is therefore screened out.

5.2 Noise affecting future occupiers

Road traffic noise at the front facade is a potentially relevant consideration, but the acoustic relationship between the existing building and Parrock Street was present when permission was granted in 2020. The current full application does not move the facade, create more than the four previously approved dwellings or introduce a materially more noise-sensitive use. The change from a window to a door within the same opening is a detailed envelope alteration rather than a new receptor relationship.

The earlier permission was granted without an acoustic condition. That history is not a numerical demonstration that BS 8233 targets are achieved, and it does not prevent the Council from considering genuinely new evidence. It is, however, strong evidence that the residential principle and its relationship with the road were previously assessed without noise being identified as a matter requiring pre-commencement investigation or mitigation.

The existing building has a substantial retained envelope and the current scheme includes repair, refurbishment or replacement of windows where necessary, subject to heritage considerations. If the Council identifies a specific concern about a particular habitable room or facade element, that matter can be addressed through a tightly scoped design query. It does not, on the evidence presently identified, justify an unqualified combined Noise and Vibration Impact Assessment at validation stage.

5.3 Agent of change

No existing business or community facility has been identified whose lawful operation could be materially constrained by the proposed conversion. Road traffic is public infrastructure rather than a business or facility requiring protection from unreasonable operational restrictions. The agent-of-change principle does not create a free-standing requirement for a full assessment in the absence of a potentially significant adverse effect from an identified existing operation.

5.4 Construction noise and vibration

The current application concerns works to convert and adapt an existing building. No piling, blasting, substantial demolition, deep basement excavation or comparable high-vibration method is identified. Temporary effects from ordinary building works can be managed through reasonable working hours and established construction controls. A predictive construction Noise and Vibration Impact Assessment would be disproportionate to the works described.

6. Proportionality

A full assessment under the local-list specification would ordinarily involve baseline monitoring sufficient to represent worst-case conditions, acoustic prediction or modelling, assessment against relevant standards and the design of mitigation. That exercise should be required only where it is capable of informing a material planning judgement that remains open on the application before the Council.

In this case:

- the four-flat conversion and road-facing receptor relationship were previously authorised by permission ref. 20200663;
- the Council-requested full application increases the four-unit scheme to 5 units but will likely provide for the same or fewer occupants, but otherwise does not move the building;
- the road relationship is an existing physical characteristic of the retained building;
- the adjoining half of the paired building is already residential;
- no specific industrial, commercial, entertainment or fixed-plant source has been identified;
- no credible material vibration source or high-vibration construction method has been identified; and
- the 2020 permission imposed no noise or vibration condition.

Taken together, those factors distinguish the application from a new-build residential scheme beside a major transport corridor or an agent-of-change proposal adjoining a noise-generating business. Although the Council is entitled to assess the full application on its merits, a combined assessment before validation would be disproportionate in the absence of an identified site-specific reason for requiring it.

7. Conclusion and requested approach

The available evidence supports screening out development-generated operational noise, mixed-use sound insulation, construction vibration and operational vibration. Road traffic noise is acknowledged as the only plausible acoustic consideration, but the proposed dwellings would occupy a retained building whose relationship with the road is already established.

Gravesham Borough Council is respectfully requested to:

- accept this Noise and Vibration Screening and Proportionality Statement for validation purposes;
- confirm that a full Noise and Vibration Impact Assessment is not required for the full planning application; and
- if Environmental Health considers further evidence necessary, identify the precise source, receptor, assessment objective and required methodology so that any work can be limited to a proportionate BS 8233/ProPG road-traffic noise assessment, with vibration expressly screened out.

This approach would allow the full application to be determined on adequate evidence while avoiding an unscoped technical exercise unsupported by an identified source, receptor or vibration mechanism.

References

1. Gravesham Borough Council, Local List of Validation Requirements, accessible version (content stated to remain as per the 2020 published list), p.15.
2. Ministry of Housing, Communities and Local Government, [National Planning Policy Framework \(December 2024\)](#), paragraphs 198 and 200.
3. Planning Practice Guidance, [Noise](#).
4. Planning Practice Guidance, [Making an application - local information requirements](#).
5. British Standards Institution, BS 8233:2014, Guidance on sound insulation and noise reduction for buildings.
6. Association of Noise Consultants, Institute of Acoustics and Chartered Institute of Environmental Health, ProPG: Planning & Noise - New Residential Development (May 2017).