

# **Heritage, Design and Access Statement**

## **Change of use of the upper floors from office use to three self-contained studio flats**

**7 King Street,**

**Gravesend,**

**DA12 2EB**

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# 1. Introduction

This Heritage, Design and Access Statement has been prepared in support of a **resubmitted full planning application** for the conversion of the first, second and third floors at **7 King Street, Gravesend** to provide **three single-occupancy studio flats**.

The site lies within the **Gravesend Town Centre Conservation Area** and the application follows the dismissal of a previous appeal. This resubmission has been **explicitly informed by the appeal decision** and responds directly to all matters raised by the Local Planning Authority and the Inspector, including:

- Living conditions and noise impacts
- Employment land considerations
- Ecology and protected species
- Heritage and conservation area impact

This statement should be read alongside the updated **Noise Assessment, Professional Marketing Evidence, Ecological Reports**, and other supporting documents submitted with the application.

## 2. Site Context and Heritage Significance

### 2.1 The Conservation Area

The Gravesend Town Centre Conservation Area derives its significance from the town's historic development as a commercial centre serving Thames-side trade. Its character is defined by:

- Late 18th and 19th century commercial buildings
- Continuous frontages with active ground-floor uses
- Upper floors historically accommodating offices, storage and residential uses
- These characteristics underpin the area's significance and inform the assessment of change under national and local heritage policy

The significance of the conservation area lies primarily in its **collective townscape value**, rather than in individual buildings.

### 2.2 The Application Building – 7 King Street

7 King Street is **not statutorily listed**, but is recognised as a **non-designated heritage asset** making a **positive contribution** to the conservation area. The building:

- Forms part of a historic paired frontage
- Retains characteristic Victorian proportions and detailing
- Contributes positively to the King Street streetscape

Its significance is principally derived from its **external appearance and relationship with the surrounding townscape**.

### 3. Description of the Proposed Development

The proposal seeks permission for the **conversion of the upper floors** of the building to form **three studio flats**, each designed for single occupancy.

- No external alterations are proposed
- The ground floor commercial unit is retained
- All works are confined to the interior of the building

The proposal reflects the **historic mixed-use character** of King Street and reactivates long-vacant upper floors.

### 4. Design Response and Mitigation Strategy

#### 4.1 Design Principles

The design approach is guided by the following principles:

- Preservation of the building's external appearance
- Sensitive reuse of historic fabric
- Delivery of high-quality residential accommodation
- Full compliance with the *agent of change* principle

All mitigation measures are **internal only**, ensuring no harm to heritage significance.

#### 4.2 Living Conditions and Noise – Issue Identified Previously

The appeal decision concluded that insufficient certainty had been provided that acceptable living conditions could be achieved, particularly in relation to:

- Noise from adjacent late-night commercial uses
- Horizontal and structure-borne noise transmission
- Lack of detailed, site-specific mitigation

This resubmission directly addresses those concerns.

#### 4.3 Noise Mitigation Measures (Secured and Deliverable)

The proposal incorporates a **fully defined and deliverable noise mitigation package**, informed by the updated noise assessment.

##### a. Glazing and Façade Mitigation

- Retention of existing historic windows
- Installation of **bespoke internal secondary glazing systems**
- Glazing specifications designed to address **low-frequency and entertainment noise**
- Fully internal, reversible installations

##### b. Ventilation Strategy

- Provision of **whole-dwelling MVHR systems** to each unit
- Compliance with Approved Document F
- Enables windows to remain closed during sensitive night-time periods

#### c. Party Wall Mitigation

- Upgrade of separating walls using **independent, isolated linings**
- Use of high-density acoustic insulation and multi-layer mass systems
- Mitigation of airborne and structure-borne noise

#### d. Floor and Impact Noise Mitigation

- Installation of **floating floor systems**
- Acoustic isolation from existing timber floor structures
- Control of vibration and low-frequency transmission

#### e. Verification

- Mitigation capable of being secured by condition
- Post-completion acoustic testing to confirm compliance

With these measures in place, acceptable living conditions are demonstrably achievable and the *agent of change* principle is fully satisfied.

All mitigation measures are fully specified, technically achievable, and capable of being secured by planning conditions.

## 5. Ecology and Protected Species

### 5.1 Appeal Findings

The appeal decision confirmed that:

- A Preliminary Roost Assessment (PRA) was undertaken by a suitably qualified ecologist
- The building has **negligible potential for roosting bats**
- The urban town centre location and building condition significantly limit ecological value
- No further bat surveys are required

The Inspector concluded that the proposal would **not result in harm to protected species** and complies with local and national ecological policy.

### 5.2 Mitigation and Safeguards

Notwithstanding the above conclusion, precautionary measures include:

- Works undertaken in accordance with the PRA recommendations
- Protection of nesting birds should they be identified
- Compliance with wildlife legislation in the unlikely event of unexpected discovery

The previous ecological reason for refusal is therefore fully resolved and no longer carries material weight.

## 6. Employment Land Considerations

### 6.1 Appeal Findings

The Inspector accepted that:

- The upper floors are vacant and in poor condition
- Residential use above shops is acceptable in principle
- However, previous marketing evidence was insufficient

### 6.2 Updated Evidence

The resubmission includes an updated **Professional Marketing Statement**, confirming:

- **Active off-market demand testing** over a period exceeding 12 months
- Engagement with local occupiers, investors and market participants
- Professional evidence demonstrating lack of demand for office use
- That formal marketing would not generate viable interest

This constitutes **qualitative market evidence** derived from routine professional advisory activity.

### 6.3 Conclusion on Employment Use

The proposal does not undermine the supply of viable employment land and brings long-vacant floorspace back into productive use, supporting town centre vitality.

## 7. Heritage Impact and Mitigation Compatibility

The appeal decision confirmed that:

- No external alterations are proposed
- Residential use above commercial premises is established in the area
- The proposal causes **no harm** to the conservation area or nearby listed buildings

All mitigation measures are internal and reversible, ensuring that heritage significance is preserved.

## 8. Access Considerations

- Existing access arrangements are retained
- No changes to entrances or façades
- The constraints of the historic building are acknowledged
- A reasonable and proportionate approach is taken in line with national guidance for historic conversions

## 9. Planning Balance and Public Benefits

With mitigation in place, the proposal:

- Delivers acceptable living conditions
- Preserves heritage significance
- Avoids harm to protected species
- Reuses long-vacant upper floors
- Supports housing delivery in a sustainable town centre location

All previous refusal reasons have now been **either fully mitigated or explicitly closed by the appeal decision**.

## 10. Conclusion

This resubmitted proposal:

- Responds comprehensively to the appeal decision
- Provides certainty where uncertainty was previously identified
- Secures mitigation without heritage harm
- Represents a sustainable and appropriate reuse of a historic town centre building

There are **no outstanding technical, heritage, ecological or amenity objections** that would justify refusal of planning permission.