



Heritage Impact Assessment

Natwest, 30 King
Street, Gravesend,
Kent

February 2026 | Project Ref 11645A



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Project Number: 11645A

File Origin: https://heritagecollectiveuk.sharepoint.com/sites/11501-12000/Shared Documents/11601-11700/11645 - Natwest, Gravesend/HER/Reports/2026.02.09_11645 Natwest Gravesend HIA_Final.docx

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- App. 1 Scale of Harm table (HCUK, 2019)**
- App. 2 Floor Plans 1987**
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1. Introduction

1.1 This Heritage Impact Assessment (HIA) has been prepared by HCUK Group on behalf of the Applicant, 4KIWI LTD, in relation to proposals affecting 30 King Street, Gravesend, Kent, DA12 2EB, henceforth referred to as the 'Site' (Figures 1 and 2).

1.2 It is proposed to convert the building to 5 residential units above ground. Pre-application advice on a more extensive scheme of works (including a side extension and roof extension) was sought in 2025. The scheme has been significantly amended in response with detailed input from HCUK Group.



Figure 1: Site Location Map. The Site outlined in red. Bing Maps

1.3 The application site on King Street consists of a four-storey building plus basement which is situated on the corner of King Street and Windmill Street. It was constructed in 1889 and is grade II listed. The site lies within the King Street Conservation Area (Figure 3) and comes under the jurisdiction of Gravesham Borough Council (GBC).



Figure 2: Exterior of 30 King Street, at the corner of King Street and Windmill Street, October 2025

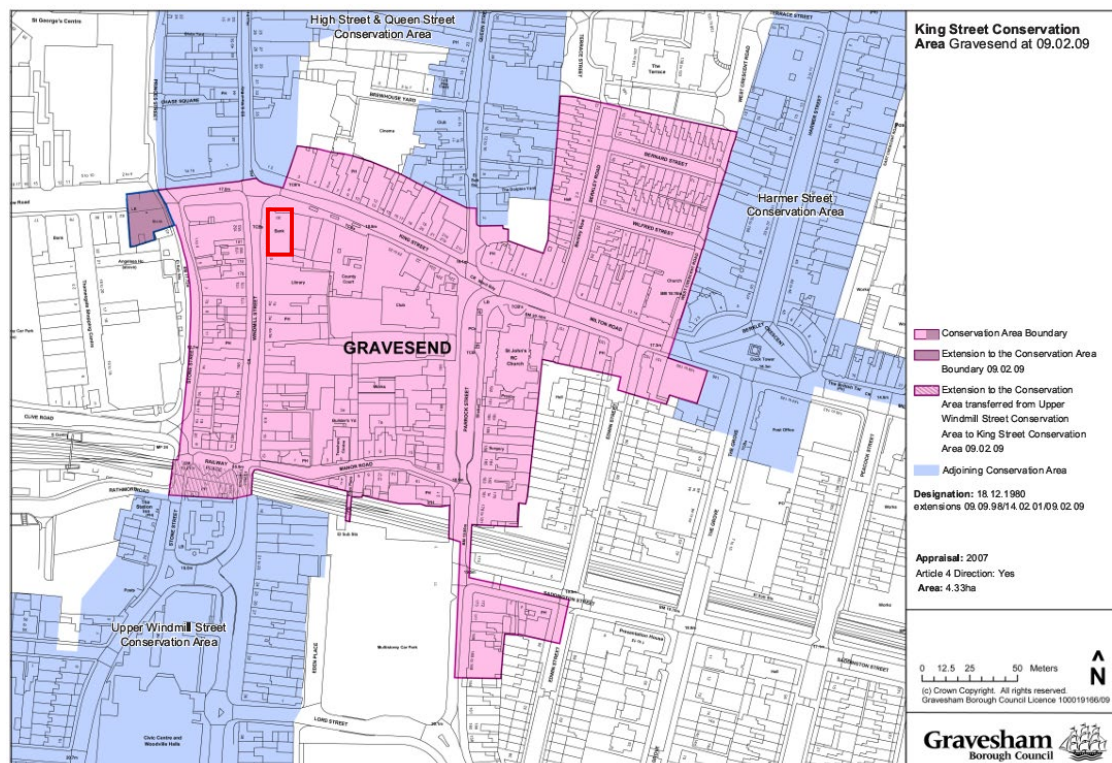


Figure 3: King Street Conservation Area Map. The Site outlined in red. Gravesend Borough Council

- 1.4** The Proposed Development entails internal alterations only to accommodate the conversion of the first, second and third floors from offices (former NatWest Bank) to 5 residential units (mix of 3 x one bed, 1 x two bed and 1 x three bed) with an entrance off Windmill Street. No works are proposed to the commercial ground floor space which is currently vacant and will be let to a suitable tenant. Some works to the entrance lobby off Windmill Street are proposed to provide communal facilities for the tenants. No works are proposed at basement level.

Structure and Purpose of this Statement

- 1.5** The purpose of this document is to provide sufficient information to allow the Council to understand the effects of the proposals upon the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised.
- 1.6** In compliance with paragraph 207 of the National Planning Policy Framework (NPPF – 2024) this report describes the significance of any heritage assets which have the potential to be affected by the proposed scheme. It also assesses the capacity of these assets to absorb change. The preparation of this report has also been informed by archival and desk-based research.
- 1.7** The heritage assets considered likely to be affected have been observed and assessed following a site visit made in October 2025. Given that the scheme entails no external alterations, the effect on the conservation area will be minimal, but the benefit of bringing a currently redundant building back into use, for the longevity and character of the wider streetscape is taken into account.
- 1.8** The proposed works have been prepared and assessed considering the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy and guidance.
- 1.9** This report should be read in conjunction with the full drawn submission and Design and Access Statement prepared by Lime Architects.

2. Relevant Planning Policy Framework

Legislation and National Policy

- 2.1** The decision maker is required by section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building, its features and its setting. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹ The presumption will plainly be lessened if the harm is less than substantial within the meaning in the NPPF as is explained further below.
- 2.2** Section 72(1) of the Act further establishes a broadly similar duty in respect of the preservation of the character or appearance of conservation areas. The meaning and effect of these duties have been considered by the courts in cases since the legislation came into effect, including the Court of Appeal decision in relation to *South Oxfordshire DC v SSE & J Donaldson (March 1991, CO/1440/89)*. The Court found that section 72 requires attention to be directed to the effect on the conservation area as a whole rather than on particular parts of it.²
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.⁴
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF, December 2024) as being made up of four main constituents: architectural, historical, archaeological and artistic interest as well as any contribution made by an asset's setting. The assessments of heritage significance

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137.

² See also *Kverndal v. London Borough of Hounslow [2015] EWHC 3084 (Admin)*, wherein Supperstone J. accepted the submission that section 72 did not amount to "a duty to maximise the enhancement of the conservation area" (para. 84) and that "a failure to take a better option is not a breach" (see paragraphs 83, 84, 86, 89 & 90 of the Judgment). In other words, if the net overall effect is beneficial or neutral, then it is illegitimate for the LPA to take the approach that there are elements which when viewed in isolation are not "good enough". The question is whether the sum total of what would be there afterwards is equal to or better than the sum total of what is there now.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.5 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 214 and 215 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.

2.6 Paragraphs 214 and 215 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 207 or 208 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 212 and 213 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

Local Plan Policy

2.8 The adopted local plan currently comprises the Gravesham Local Plan Core Strategy (2014) together with a set of saved policies from the earlier 1994 Local Plan.

2.9 Gravesham Borough Council is reviewing the Local Plan, specifically undertaking a partial review of the 2014 Core Strategy, alongside preparation of Site Allocations

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

and Development Management Policies documents. The Local Plan Partial Review has passed Regulation 18 consultation stages and is progressing toward the next formal stages of plan-making.

- 2.10** The policies of the Local Plan have been considered in the preparation of this assessment, regarding those relating to the historic environment. The King Street Conservation Area Character Appraisal (2007) has also been given due regard.

Guidance Documents

National Planning Practice Guidance (NPPG)

- 2.11** The National Planning Practice Guidance (NPPG; ref: 18a-018-20190723; updated July 2019) provides advice on enhancing and conserving the historic environment in accordance with the NPPF.
- 2.12** NPPG notes that public benefits can be heritage based for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit. The guidance goes on to note that examples of heritage based public benefits include:
- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
 - Reducing or removing risks to a heritage asset; and
 - Securing the optimum viable use of a heritage asset in support of its long-term conservation.

Historic England Guidance

- 2.13** This report has been informed by the following additional guidance:
- **Historic England: Good Practice Advice in Planning Note 2 – Managing Significance in Decision Taking (2015)**
Sets out the process for understanding and assessing heritage significance at the outset of design. Advises applicants to consider a site's historic,

architectural and setting values early, seek expert advice, and provide proportionate information to explain how a proposal affects that significance.

- **Historic England Advice Note 12 – Statements of Heritage Significance (2019)**

Advises how to prepare proportionate heritage significance statements to inform planning decisions. Stresses that significance should be understood before design work progresses and that the level of detail provided should match the asset's importance and the scale of impact.

- **Historic England Advice Note 1 (2nd ed.) - Conservation Area Appraisal, Designation & Management (2019)**

Explains how to appraise and manage conservation areas, including how to judge whether unlisted buildings make a positive contribution. Emphasises proportionate evidence, assessment of building form and historic value, and opportunities to enhance character when altering or extending buildings.

3. Background and Development

Historic Development of Gravesend

3.1 Gravesend occupies a strategic position on the south bank of the River Thames and has developed over many centuries as a riverside settlement, port and crossing point. From at least the medieval period, the town functioned as a key node in regional and international movement, serving river traffic, trade and communication between London and the North Sea. Its historic role as a place of embarkation and arrival shaped both its economy and its physical form.

3.2 From the 18th century onwards, improvements to transport infrastructure further reinforced Gravesend's urban role. River trade remained important, while the arrival of the railway in the 19th century strengthened links with London and the wider region. These changes supported population growth and commercial expansion, prompting significant redevelopment within the town centre during the Victorian and Edwardian periods.



Figure 4: Ordnance Survey map of 1863, showing the town centre at this time. The location of the site outlined in red (in 1863 St Thomas's Almshouses) National Library of Scotland

Development of King Street and the Town Centre

3.3 King Street forms one of the principal historic commercial streets within Gravesend town centre and lies at the heart of the King Street Conservation Area. Together with adjacent streets including Windmill Street, Milton Road and Parrock Street, it forms the historic commercial and civic core of the town.



Figure 5: Photograph of Gravesend, King Street, early 20th century showing No. 30 to the right side.



Figure 6: Postcard of Gravesend, Milton Road, 1907

3.4 The later-19th and early-20th centuries marked a period of substantial redevelopment within this area. Earlier buildings were frequently replaced or remodelled to accommodate new commercial, financial and municipal uses. This phase of development was often characterised by the consolidation of plots and the construction of larger, purpose-built structures designed to occupy prominent sites within the street network, particularly corner locations.



Figure 7: Aerial photograph of Gravesend, 1928. Britain from Above

3.5 As a result, the town centre acquired a distinctive architectural character during this period, with confident red brick buildings enriched by stone dressings, formal elevations and assertive corner compositions. These buildings reflected the growing commercial and administrative role of Gravesend within the Thames corridor and the wider region.

King Street Conservation Area (Historic Development)

3.6 The King Street Conservation Area encompasses the historic commercial centre of Gravesend and is a product of successive phases of development, with particular emphasis on late Victorian and Edwardian rebuilding. The Conservation Area Appraisal identifies this period as one in which the architecture of the area was revitalised through the construction of banks, civic buildings and institutional premises.

- 3.7** These buildings typically employ red brick construction with stone detailing, including pediments, pilasters and articulated ground floors, contributing to a shared architectural language across the town centre. While many historic shopfronts elsewhere in the area have been altered or replaced during the later-20th century, the Appraisal notes that certain stone-faced buildings, including bank buildings on King Street (and the site at 30 King Street), retain a more formal architectural treatment at street level.
- 3.8** 30 King Street is specifically referenced within the Conservation Area Appraisal as an authoritative corner building constructed in this late 19th-century phase of development and as a building which retains its historic architectural character within the streetscape.

Late-19th-Century Banking Architecture (Context)

- 3.9** The construction of substantial bank buildings in town centres during the late-19th century formed part of a broader national pattern. Financial institutions sought prominent urban sites and adopted architectural styles intended to convey stability, permanence and civic presence. As a result, bank buildings were frequently designed with imposing façades, enriched detailing and carefully articulated entrances, often occupying corner plots to maximise visibility and legibility within the townscape.
- 3.10** Architectural styles commonly drawing on Baroque and Arts and Crafts influences were often employed for such buildings, combining traditional materials with formal composition and decorative stonework.
- 3.11** These design approaches were well suited to urban commercial streets, such as that in Gravesend for King Street, where buildings were intended to address multiple elevations and contribute to a cohesive town centre environment.

Development of 30 King Street

- 3.12** 30 King Street occupies a prominent corner position at the junction of King Street and Windmill Street and was constructed in 1889 during the period of intensive town centre redevelopment described above. The building was designed by Alfred Williams in an Arts and Crafts Baroque style and was purpose-built as a bank.



Figure 9: Ordnance Survey Map of 1907, the site outlined in red. National Library of Scotland



Figure 10: King Street in 1902, 30 King Street at the right foreground of the image. Francis Frith



Figure 11: King Street in 1902, 30 King Street at the right foreground of the image. Francis Frith

Figure 12: Gravesend Windmill Street and Library, c. early 20th century, 30 King Street in the centre of the image. Discover Gravesham

3.13 The building is three storeys in height with attics and is constructed in red brick with stone dressings. It was deliberately designed to address both street frontages. Two pediments containing Venetian windows articulate the upper elevations and are

separated by squat turrets with round windows, balustrading is employed at roof level. The King Street elevation has mullioned windows with carved shields, contributing to the formal architectural treatment.

3.14 At ground floor level, the elevations are defined by stone pilasters and round-headed windows with scrolled keystones and swag mouldings. The principal entrance is located within a projecting corner extension and is marked by a stone pediment supported on Roman Ionic columns and pilasters, with a stone urn above. A date stone bearing the initials “LCB” records the building’s original construction. The Windmill Street elevation continues this architectural language, including additional mullioned and round-headed windows, ensuring a consistent treatment across both elevations.

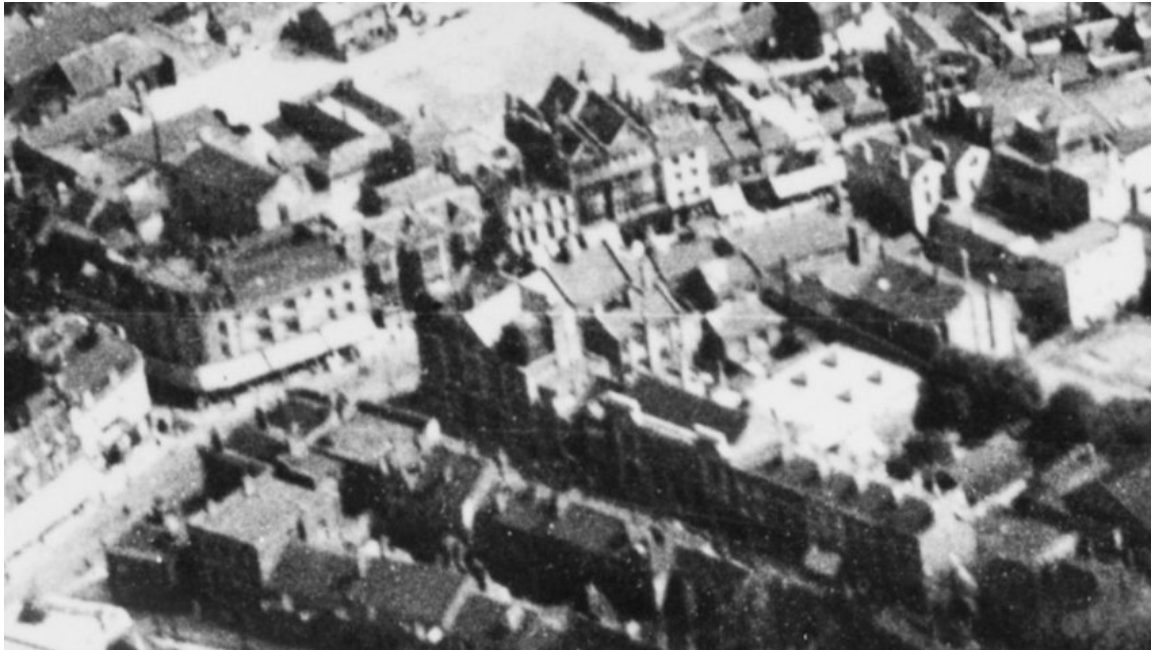


Figure 13: Extract from 1923 aerial photograph, the town centre, Gravesend, 1923. Images from Above

Later History and Survival

3.15 Despite substantial change elsewhere within Gravesend town centre during the 20th century, 30 King Street has retained its overall form and architectural composition. While internal alterations and changes of use have occurred over time, the exterior of the building continues to express its late-19th-century origins and purpose-built design. The building remains as a physical expression of the phase of late-Victorian

commercial redevelopment that reshaped King Street and the surrounding town centre.

3.16 30 King Street has not survived so well inside. Major works to the building in the 1970s, likely prior to listing, and further works in 1987 (via listed building consent) have resulted in a utilitarian office environment with dropped ceilings, modern doors and finishes. Features do survive internally and are scheduled in the next chapter.



Figure 14: 30 King Street in 2004. Historic England Archive

3.17 The planning history for the property is summarised in the table below:

Reference	Description	Decision	Decision Date
20150884	Application for Listed Building Consent for reconfiguration of existing branch to improve services and layout.	Permitted	19.11.2015
19910672	Application for Listed Building Consent for the formation of two new internal openings in the party wall at basement and ground floor levels in connection with the proposed extension of the Bank into 29 King Street.	Permitted	10.01.1992
19870658	Application for Listed Building Consent for internal alterations at basement ground first second and third floor levels and elevational alterations in connection with the proposed rear extensions	Permitted	26.10.1987
19870657	Erection of extensions at the rear up to second floor level to form enclosed new staircase plant room stationery rooms and lift	Permitted	17.07.1987
19780422	The installation of an internal staircase and the bricking up of an arched window at ground floor level	Permitted	27.07.1978
19750526	Alterations to windmill street elevation	Permitted	21.10.1975

Current Condition

3.18 HCUK Group visited 30 King Street in October 2025 with a view to understanding the level of surviving interior features that may or may not have been affected by past works. It is evident that the building has undergone considerable change in the last 50 years but retains some key features of interest. The building is at a point where its condition could materially worsen if it is not put into a new use. A floor by floor description of features is provided below.

Basement

- 3.19** This level of the building is outside the scope of the application but in summary the basement is an area of two halves. That to the front, underneath the main banking hall on the northern side retains a large open space used as vaults with white glazed tiles and internal metal enclosure where the safes were kept. The space is essentially close to its original condition (although likely would have had much more fixed furniture like shelves).
- 3.20** The southern part of the basement level has been comprehensively altered through the reconfiguration of rooms, introduction of breeze block walls, overpainting of all services and the insertion of concrete floors, modern joinery and modern services. There are no historic features of note in the southern half of the basement floor plan.

Ground Floor

- 3.21** At ground floor the principal banking hall survives with internal decorative features at high level, including cornice, and some joinery around the windows and walls. The interior is retained for the period and has likely lost some of the bespoke fixed furniture that would have been designed for the space. Two insertions have been made providing separate rooms which intrude onto the volume of the space. To opening in the party wall to the adjacent building has been closed up.
- 3.22** To the rear there are no features of note. The 1987 works involved the insertion of a lift and staircase to the rear, and the removal of a staircase and some original partitions. The staircase just inside the Windmill Street entrance is necessarily utilitarian and appear to date from the 1930s in cast concrete with metal balustrade.

First Floor

- 3.23** At first floor level the interiors have been highly altered but a single historic staircase between the lower southern part of the building and the higher northern part of the building survives, cut off below but continuing up to second floor level. The front room at the northern end of the building has been subdivided into three (1987 works) and all the joinery is modern. There are dropped ceilings throughout

but with some evidence of surviving cornice runs in two of the front rooms. Aside from the staircase and some cornice runs the historic floor plan is not legible in any meaningful way. There has been removal of areas of wall (downstands retained) and insertion of toilets and cupboards in corridors. To the rear, a large curved window shown on the 1987 as existing plan was removed when the new staircase extension was added.

Second Floor

3.24 Similarly at 2nd floor the interiors are much altered with the loss of historic partitions to provide open plan areas for the office use and the removal of staircases all happening in the 1980s. There are no features of specific interest aside from the central staircase. All joinery, while in keeping generally appears to have been reapplied or is replica.

Third Floor

3.25 At third floor level the interior features again do not survive, with two plain rooms accessed from a staircase that appears to have been inserted in the 1987 renovation but may have reused a newel post from other historic staircases in the building.

4. Statement of Significance

Assessment of Significance

4.1 This section assesses the significance of heritage assets potentially affected by the proposed development, in a proportionate way. Namely the effect of the proposed internal and works on the heritage significance of 30 King Street.

4.2 Significance is determined through statutory designation and professional judgement, using the NPPF/NPPG's categories of interest - architectural, historical, archaeological, and artistic - as well as Conservation Principles (2008), which identify evidential, historical, aesthetic, and communal values.

4.3 Not all aspects of a heritage asset are equally significant; some areas may accept change without harm. Change is only harmful when it reduces an asset's significance. Understanding this significance (NPPF para. 207) is key to assessing whether change is appropriate.

No. 30 King Street, Gravesend (Grade II)

4.4 The Historic England listing for the property is as follows:

"Dated 1889. Built in Arts and Crafts Baroque. The architect was Alfred Williams. Corner building, 3 storeys and attics red brick with stone dressings. 2 pediments having Venetian windows with brick dressings separated by squat turrets having round windows. Balustrading. The King Street elevation has 2 4-light mullioned windows separated by carved shields. The ground floor has stone pilasters and round-headed windows surmounted by scrolled keystone and swag moulding. The doorcase is set in a projecting corner extension and has a stone urn above. Brackets. Stone pediment supported on Roman Ionic columns and pilasters. Date stone with the initials LCB. The Windmill Street elevation is similar but has 5 mullioned windows and 2 round-headed windows on the ground floor. To the right there is a matching extension of 2 storeys and 2 windows."

Summary

4.5 30 King Street is a late-19th-century former bank building constructed in 1889 to designs by Alfred Williams. It holds architectural and historic interest as a purpose-built financial institution of the late-Victorian period, expressed through its Arts and Crafts Baroque design, high-quality materials and prominent corner composition. The building illustrates a period of commercial confidence and redevelopment within central Gravesend and retains a strong external architectural presence, particularly at street level. Its corner siting and dual elevations contribute to its legibility within the historic town centre and within the King Street Conservation Area.

Historic Interest

4.6 The historic interest of 30 King Street derives from its construction as a bank during a period of late-19th-century commercial expansion in Gravesend. The building reflects the growth of financial and administrative institutions within the town at a time when improved transport links and economic activity reinforced its role as a commercial centre on the Thames.

4.7 The building's date stone of 1889 and initials "LCB" provide direct evidence of its original institutional purpose and development. As a purpose-built bank, it illustrates broader historic patterns in which financial institutions sought prominent urban sites and commissioned architect-designed buildings to convey stability and authority. Its continued presence within the town centre provides a tangible record of this phase of Gravesend's development.

Architectural Interest

4.8 30 King Street displays architectural interest through its Arts and Crafts Baroque design, red brick construction with stone dressings, and carefully articulated elevations. The building is somewhat imposing with three storeys and attic, and is composed to address its corner location, presenting coherent and consistent architectural treatment to both King Street and Windmill Street.

4.9 Particular architectural features of note include pediments containing Venetian windows, squat turrets with round windows, balustrading at roof level, mullioned windows with carved shields, and a richly detailed ground floor articulated with

stone pilasters, round-headed windows, scrolled keystones and swag mouldings. The principal entrance has presence on the street through a projecting corner bay, featuring a stone pediment supported on Roman Ionic columns and pilasters.

- 4.10** The architectural interest of the building lies predominantly in its external form and detailing. Internally, extensive alterations have occurred over time, eroding the original plan form and features. Some interior features do remain, for example a limited number of cornices above dropped ceilings and some architraves with two staircases (one original, the other 1930s). The areas which contribute most to heritage significance are the ground floor banking hall, the basement vaults area and the surviving historic walls and staircase on the upper floors. The significance of the building is primarily derived from its outward expression as a late-Victorian institutional structure and its contribution to the historic streetscape of the town.

Evidential / Archaeological Interest

- 4.11** The building has limited archaeological interest below ground, given its late 19th-century construction within an established urban context. However, evidential value is retained within the standing fabric, including original materials, construction techniques and detailing which provide insight into late-Victorian commercial architecture and building practices.

Aesthetic / Artistic Interest

- 4.12** 30 King Street possesses aesthetic value in the quality of its design, materials and craftsmanship. The contrast between red brickwork and stone dressings, together with the rhythmic composition of windows and Classical detailing, creates a visually rich and assertive building within the streetscape.
- 4.13** The corner composition, articulated entrance and roofline elements give the building a strong visual presence, reinforcing its role as a noticeable building within the town centre. The aesthetic interest is most evident for the exterior of the property, and at street level, where stone detailing and formal composition distinguish the building from more modern buildings nearby.

Communal Interest

- 4.14** The building holds communal interest as a long-standing institutional presence within Gravesend town centre. As a former bank, it reflects a function historically associated with civic life and the everyday economic activity of the town.
- 4.15** Communal value today is primarily indirect, arising from the building's continued visibility within the townscape and its role in shaping collective understanding of Gravesend's late-Victorian commercial history.

King Street Conservation Area

Summary

- 4.16** The King Street Conservation Area encompasses the historic commercial core of Gravesend town centre and derives its significance from its layered historic development, with particular emphasis on late-Victorian and Edwardian rebuilding. The area reflects Gravesend's evolution as a commercial, administrative and civic centre, expressed through its street pattern, plot structure and concentration of purpose-built commercial and institutional buildings.

Historic Interest

- 4.17** The historic interest of the historic environment within the Conservation Area lies in its representation of Gravesend's growth from a riverside settlement into a prosperous town centre serving local and regional commercial needs. The late-19th and early-20th centuries were a formative period, during which earlier buildings were replaced or remodelled to accommodate banks, municipal buildings and other institutional uses.
- 4.18** This phase of redevelopment illustrates wider national and regional social and economic trends, including increased commercial confidence, improved transport links and the professionalisation of financial and civic services within towns such as Gravesend.

Architectural Interest

- 4.19** Architecturally, the Conservation Area contains a number of examples of late-19th and early-20th-century red brick buildings with stone dressings, formal façades, articulated ground floors and prominent corner buildings. Banks and civic buildings from the late-Victorian and Edwardian periods display a consistent architectural language intended to convey permanence and authority.
- 4.20** While many historic shopfronts from earlier periods have been altered or replaced in the later-20th century, the Conservation Area retains a number of large stone-faced and architect-designed buildings which continue to express the historic character of the town centre.

Evidential / Archaeological Interest

- 4.21** Archaeological interest within the Conservation Area is variable but generally limited by extensive urban development. Nevertheless, many historic buildings provide evidential value through their fabric, materials and construction, allowing the historic development of the town centre to be understood.

Aesthetic / Artistic Interest

- 4.22** The aesthetic value of the Conservation Area derives from the collective presence of late-19th- and early-20th-century buildings, their scale, materials and architectural detailing. The interplay of red brick and stone, together with formal elevations and articulated corners, creates a somewhat cohesive and pleasing townscape character.
- 4.23** Key prominent buildings such as banks and civic institutions are notable additions to the streetscape and often contrast with more modest commercial premises, contributing to the variety and visual interest of the area.

Communal Interest

- 4.24** The Conservation Area holds communal value as the historic focus of commercial, civic and social activity within Gravesend. Its streets have historically been places of work, business and public interaction, forming part of the collective memory and identity of the town.

- 4.25** This communal interest continues through the ongoing use of the town centre as a shared urban space.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter. HCUK Group was engaged by the applicant after pre-application advice had been received from GBC in September 2025. This advice related to plans for the conversion of the building into eight residential units. The scheme also involved a side extension at 2nd floor level (fronting Windmill Street) and roof level alteration to incorporate the turrets into living accommodation.

5.2 Following extensive advice from HCUK Group the scheme has been rationalised and scaled back to ensure the heritage significance of the listed building is maintained and enhanced through works to the interior to convert the building to five units. While the scheme no longer includes a side extension facing onto Windmill Street the size and location of the previous extension was not considered out of keeping with the pattern of development along the street and would not have caused material harm to the listed building. As it is, this is no longer proposed, and the works are internal in their entirety.

The Proposal

5.3 It is proposed to convert the first floor into two residential units, the second into two units and the third into one unit. The works are the minimum required to bring the building back into use on the upper floors in a sustainable way that will secure the buildings long term future.

5.4 The proposed drawings indicate all the fabric to be removed in red with new fabric to be inserted in dark grey.

Ground Floor Alterations

5.5 At ground floor level the works involve the following:

- Insertion of curved partition to divide basement staircase from residential entrance

- Removal of two modern doors and replacement of two modern doors to provide storage spaces in existing WCs
- Installation of ramp into modern rear extension to form bin store
- Removal of modern staircase in modern rear extension to form bike store
- Insertion of partition to enclose underside of 1930s staircase for storage cupboard

Effect on significance

5.6 The works at ground floor entail no removal of historic fabric and will have no effect on the heritage significance of the building. They work with the existing fabric, which is largely modern in this area, to provide communal facilities to the residents above. None of the works will harm heritage value.

First Floor Alterations

5.7 The works at first floor have been carefully designed to work with the exiting fabric of the building and entail:

- Creation of two units involving removal of several modern partitions inserted in 1987
- Reinstatement of partitions where they have previously been lost
- Introduction of new opening in historic spine wall to provide access to flat 2
- Introduction of new single door opening in historic wall to provide internal access between two and hallway in flat 1

Effect on Significance

5.8 The effect on historic fabric at first floor level has been kept to the minimum necessary to bring the building into a new use. It involves the removal of a very small area of brickwork in two walls, with no decorative elements affected. All the other alterations relate to fabric dating from the 1987 renovation. They include the removal of inserted partitions providing office cupboard and toilets on the rear landing for instance, that will better reveal the original proportions and spatial qualities of the interior. In addition, the works will entail the removal of the dropped ceilings and office paraphernalia – bulk cabling boxes for instance.

5.9 Overall, the works will serve to enhance the special interest of the building by removing inappropriate modern office paraphernalia, revealing the remnant cornices that survive in the front rooms and providing a more cellular layout, more akin to how the building would have originally been laid out. The layout has been worked through several times to ensure the least historic fabric is affected.

5.10 Crucially, the layout reintroduces the historic staircase at the centre of the floor plan as the primary staircase providing access between first and second floor. It removes the modern rear staircase and better reflects the historic circulation of the building, enhancing an understanding of its original layout to some degree.

Second Floor Alterations

5.11 At Second Floor Level the layout is similar to the floor below providing two flats through the following alterations:

- Reintroduction partitions within the northern rooms to form flat 4
- Introducing one opening in a historic wall to provide access to flat 4 rooms
- Introducing one single door opening in a historic wall to provide access in flat 3 between the living area and bedrooms
- Reopening what was a window facing out onto the rear lightwell and dropping it to form a door in flat 3
- Introduction of various partitions to provide bathrooms and cupboards in both flats.

Effect on Significance

5.12 The effect on the historic fabric at this level is very low and the minimum required to allow the plan to be divided into two flats ensuring the central historic staircase is retained in situ. Two openings in historic walls are proposed, both modest in scale and both inserted into the walls with a downstand for legibility. The third opening is in the original rear east facing wall of the building, which has become an internal wall with the 1987 extension. The opening will be a door rather than a window but given the entire lack of legibility of floor plan in this rear area the small area of brick removal will not affect significance.

- 5.13** The works will entail the reintroduction of a more cellular floor plan and will reintroduce the historic central staircase as the principal staircase, removing the modern staircase to the rear and reorientating the circulation of the building back to its historic layout to some degree. This will enhance the legibility of the floor plan and make the historic staircase the principle feature it should be.
- 5.14** Overall, no harm is assessed to the second floor level when considering the diminish level of historic fabric affected and the enhance of the circulation and layout of the area into a more cellular arrangement. While the insertion of bathrooms and corridors is a necessary exercise to divide the floor plan, the principal rooms have been divided as little as possible to ensure the spatial qualities are enjoyed.

Third Floor Alterations

- 5.15** At third floor level a single unit is proposed, accessed via the existing staircase. The works involve:
- Removal of modern partitions and insertion of new partitions to provide one bedroom flat

Effect on significance

- 5.16** This level of the building has no features and has been altered in the past. Both walls serving the central corridor are modern in construction. While the floor plan will be altered, it is not in its original state or layout. A staircase originally came up in a different direction to that which exists today, which was inserted in 1987.

Works to the whole building

- 5.17** To bring the building back into use all the windows will need to be repaired and restored, while some are in good condition, the timber windows at third floor level are degrading and need to be fully overhauled. At this time there is no proposal to replace any windows with the exception of the modern glazed window serving the first floor rear toilets. The window facing Windmill Street will be replaced to match the other windows on the elevation, thus restoring the character of the elevation and enhancing heritage significance. The details of this will need to be conditioned.

5.18 The building has already undergone significant change regarding internal services and plant. The existing wiring for electrics, plumbing and ventilation are all within the floor voids or boxed out in risers. The same strategy will be employed for the conversion to limit excessive intrusion into the fabric, although the fabric has been altered to such an extent that it is not highly sensitive to the insertion of risers and or pipework runs. Conditions attached to any permission are able to deal with this detailed stage.

Effect on significance

5.19 The proposed works have been carefully thought through in order to maximise the heritage benefits and minimise impacts on historic fabric and character. Taking the scheme as a whole it is materially different to that which was advanced at pre-application stage and takes a minimum intervention approach. The level of historic fabric affected by a small number of new openings in historic walls is de minimis and less than 1% of the total historic fabric in the building. The works will enhance the character of the interiors of the building by removing 1980s fittings, dropped ceilings, doors and staircases to better reveal the few cornices that survive and reintroduce the historic staircase as the principal central circulation route between the first and second floors.

5.20 30 King Street will be enhanced by the proposal, bringing the building back into a long term, sustainable use to ensure its survival into the future without any harmful works or changes that would compromise the historic and architectural interest of the building.

5.21 This assessment concludes that paragraphs 214-215 of the NPPF are not engaged and no harm would occur to the special interest of the building. The proposal accords with the local and national policy context to put historic buildings to their optimum viable use and ensure their heritage significance is maintained.

6. Conclusions

- 6.1** 30 King Street is a designated heritage asset of clear architectural and historic value, deriving its significance predominantly from its external Arts and Crafts Baroque composition, prominent corner siting, late-19th-century banking architecture, and contribution to the character and appearance of the King Street Conservation Area. Internally, while parts of the historic circulation core and selective decorative features survive, the building has undergone substantial 20th-century change, limiting its legibility and reducing the sensitivity of many internal spaces to alteration.
- 6.2** The proposed development has been designed with a minimum intervention approach that focuses on reinstating coherent spatial character, removing harmful modern accretions, and enabling viable long-term reuse. Across all levels, interventions are confined to areas where 1980s office subdivision and later works have already compromised the historic fabric. The few new openings required to enable functional flat layouts amount to less than 1% of historic fabric and are modest and legible. Their effect on the overall significance of the listed building is negligible.
- 6.3** The scheme will bring about material heritage benefits including removal of inappropriate 20th-century fabric, dropped ceilings and office infrastructure; reinstatement of a more cellular plan form aligned with the building's historic planform; reinstatement of the central historic staircase as the primary circulation route; enhanced visibility of surviving cornices and other residual features; repair and conservation of original windows; and reinstatement of a historically consistent window on the Windmill Street elevation, strengthening the conservation area streetscape.
- 6.4** The proposed works would not harm the significance of the listed building and Paragraphs 214–215 of the NPPF are therefore not engaged. The scheme accords with local policy objectives. By securing a high-quality and sustainable adaptive reuse, the development ensures that 30 King Street remains an active and positive component of Gravesend's historic townscape, strengthening its long-term resilience and heritage value.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 214 and 215, and guidance on NPPG).⁷

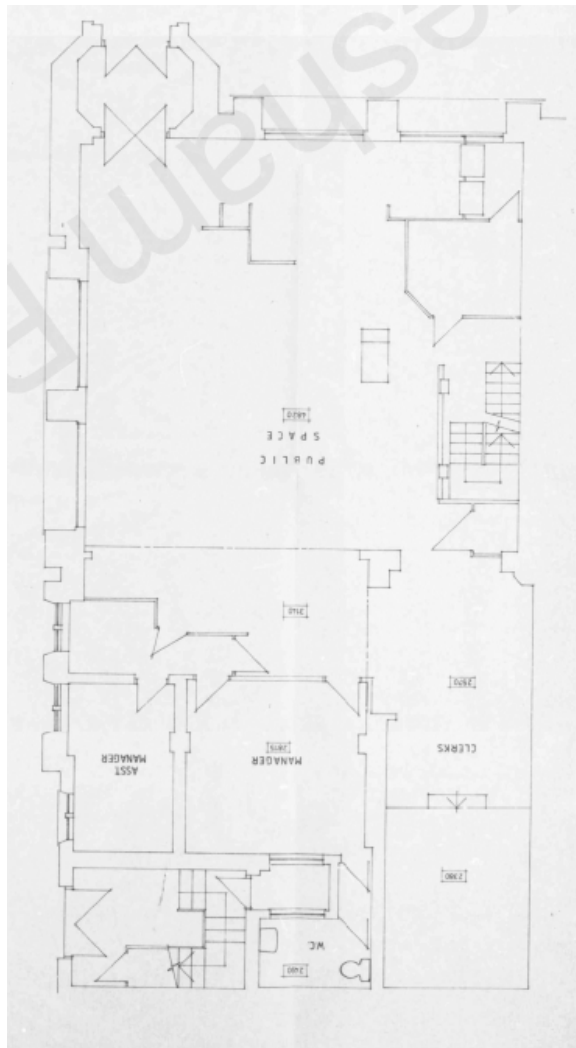
Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

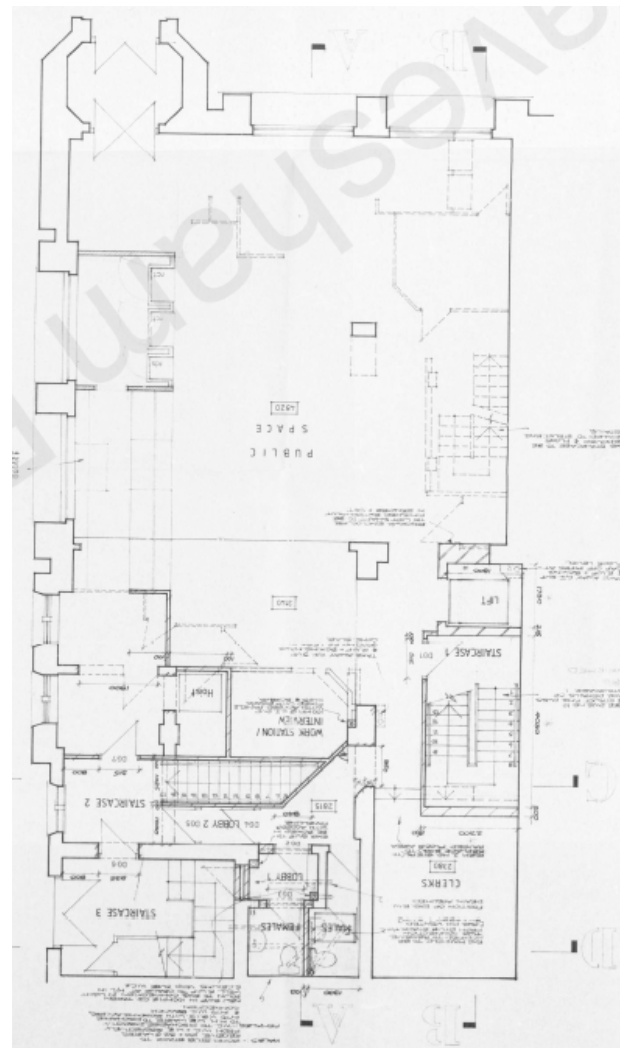
⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

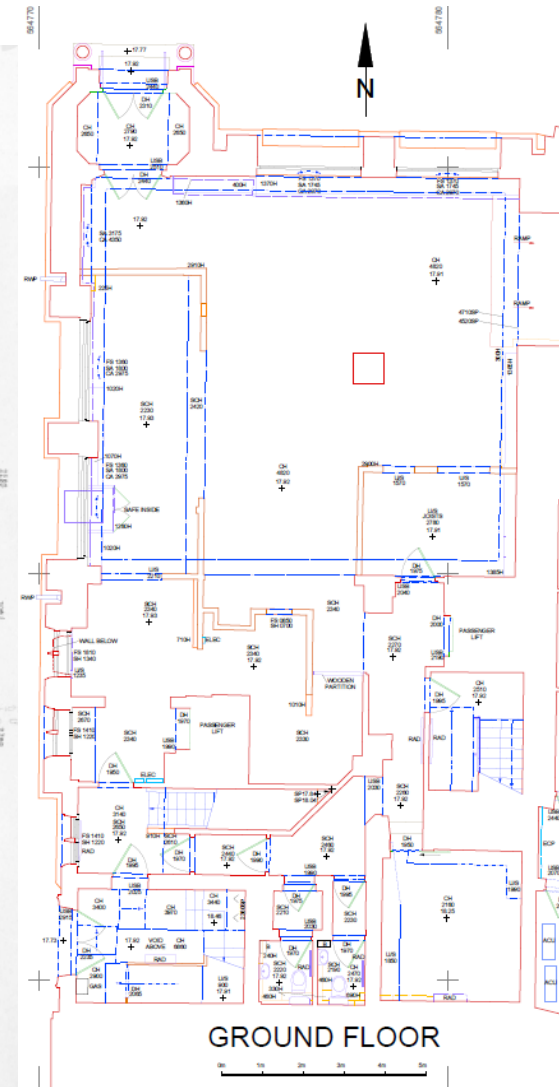
Historic and Current Floor Plans



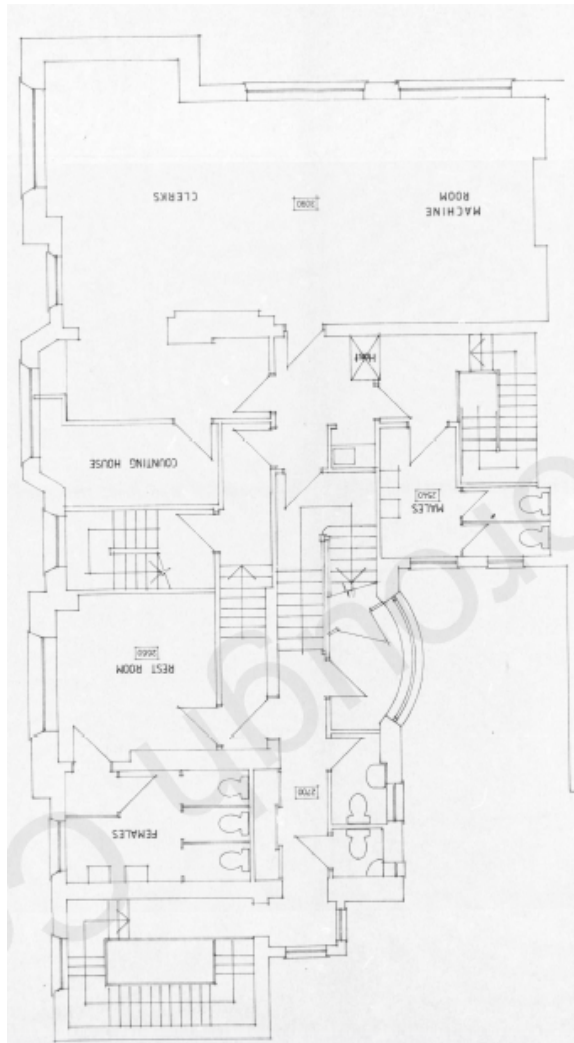
Ground As Existing 1987



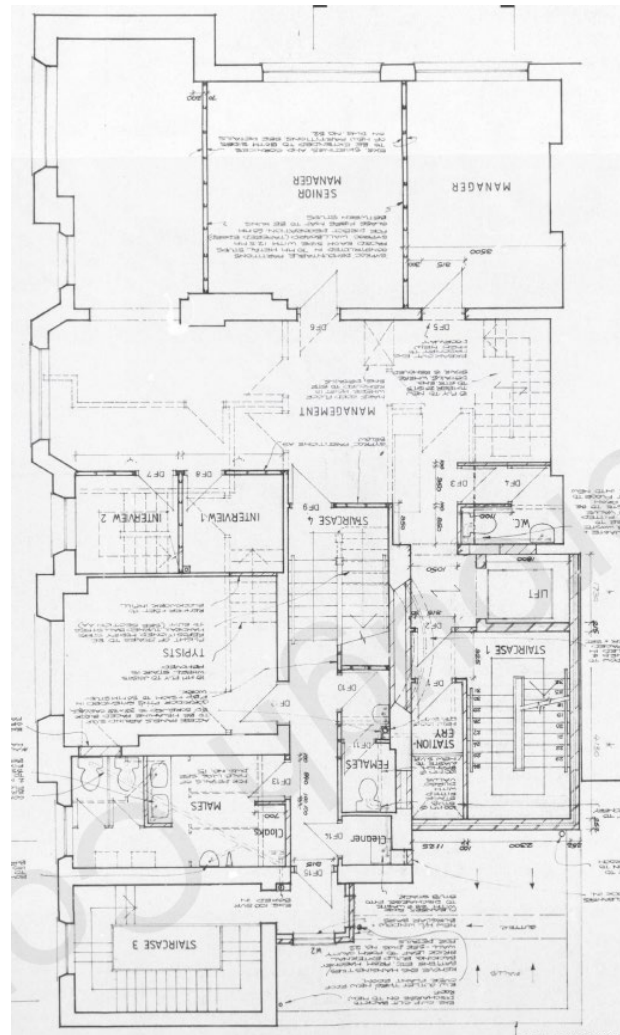
Ground As Proposed 1987 (implemented)



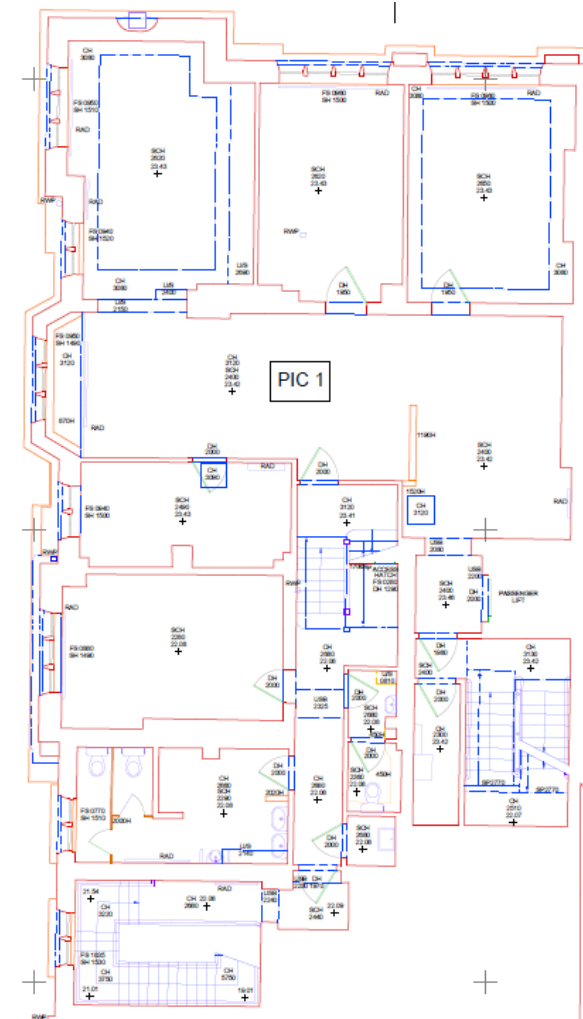
Ground Floor As Existing



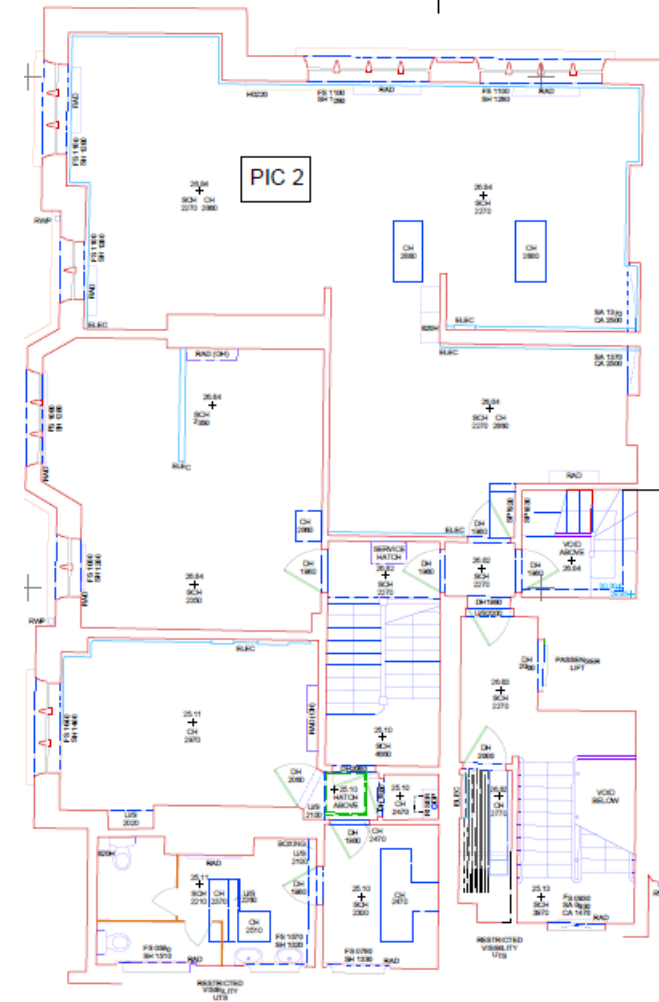
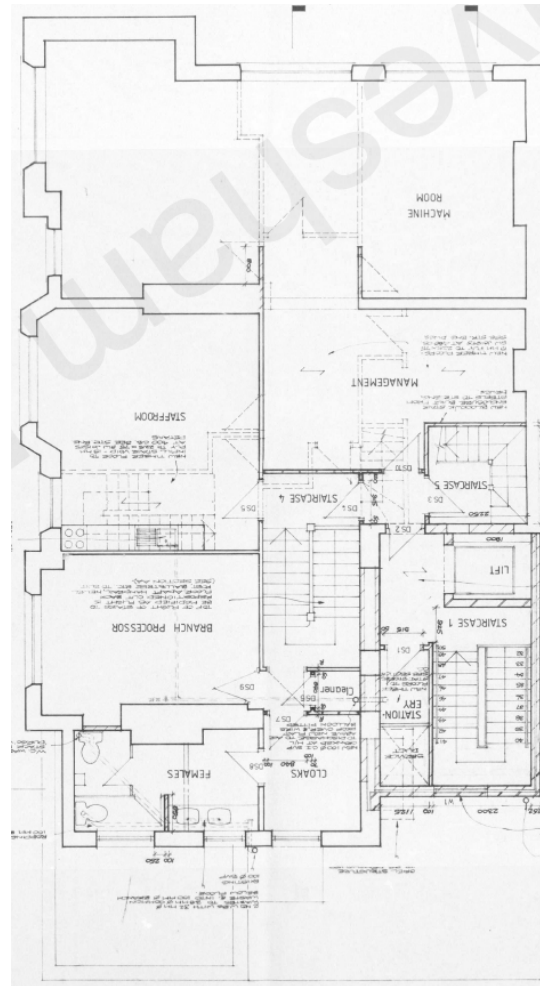
Existing First Floor 1987



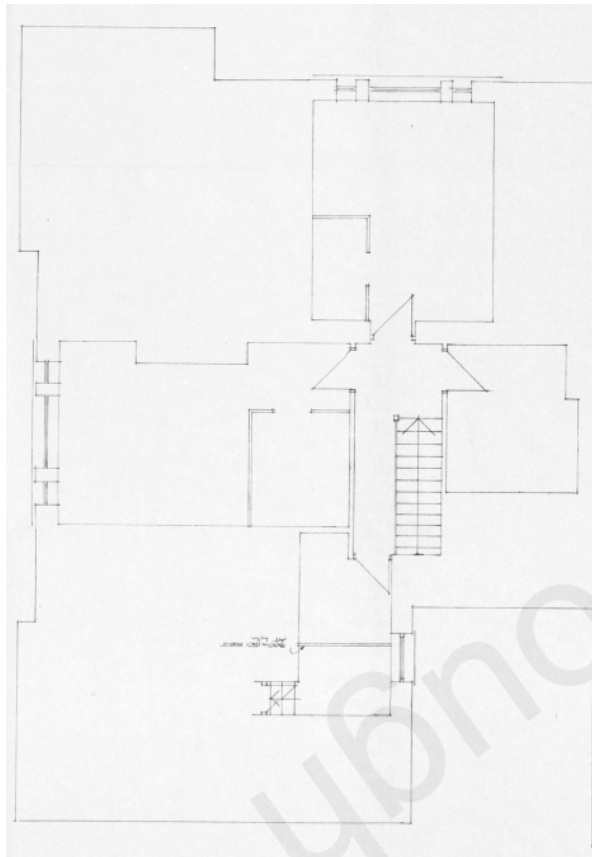
Proposed First Floor 1987



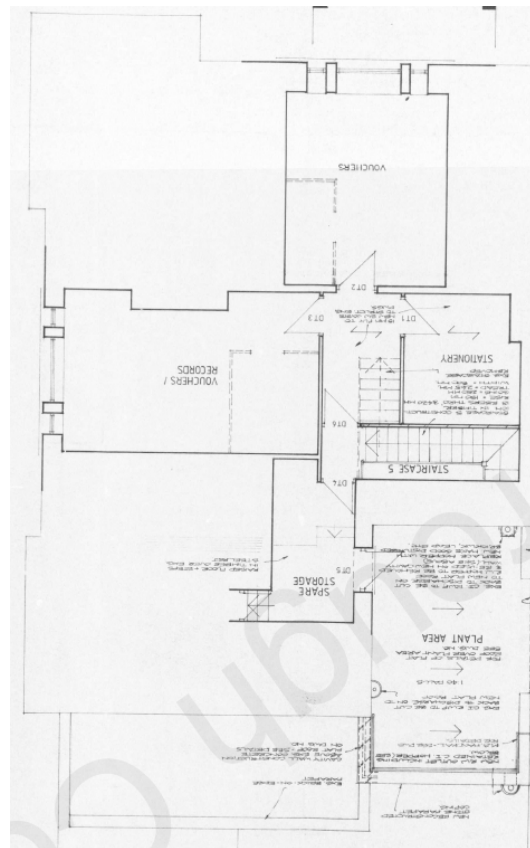
First Floor As Existing



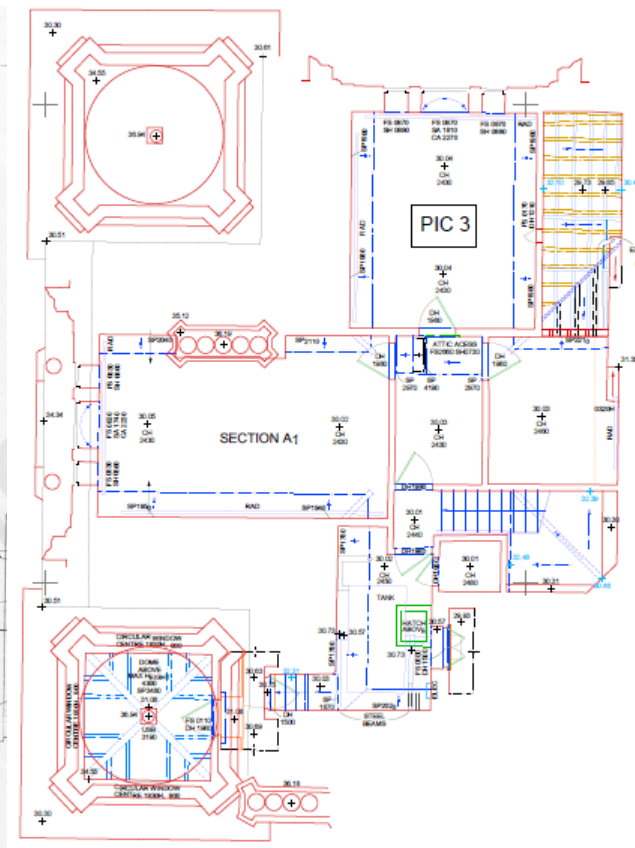
Second Floor As Existing



Existing Third Floor 1987



Proposed Third Floor 1987



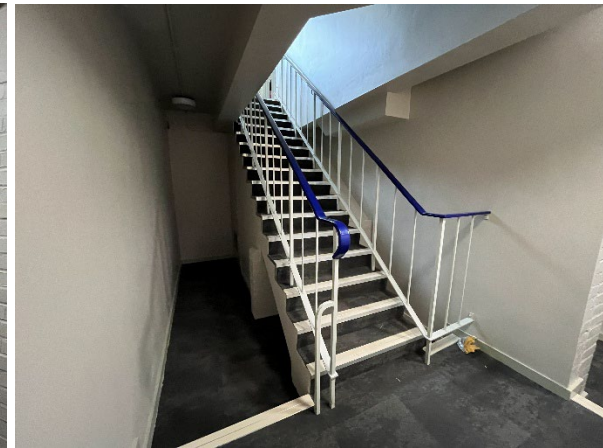
Third Floor As Existing

Appendix 3

Photographs 2025



Basement Northern Section with historic glazed tiles and vault areas



Basement Southern section with highly altered configuration, modern doors and staircase



Ground Floor Banking Hall, and rear subdivided areas with inserted services in many locations



Ground floor rear areas – all 1987 fabric and finishes including basement staircase



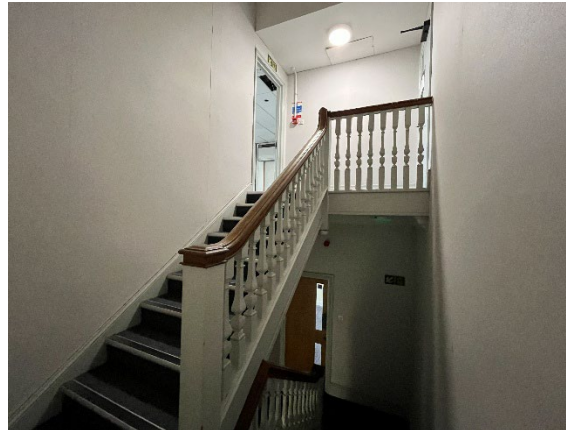
Typical First Floor condition – modern fit out but with some surviving cornice in front rooms



First floor details - 1930s rear staircase, original central staircase, typical room



Second floor details – Typical room appearance, plasterboard ceilings above dropped ceiling and original windows



Second floor details – central historic staircase and typical rear room



Third Floor details – two rooms with the same window configuration, area of fitting removed to show modern wall construction

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

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National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)