



LIVING IN MODERN ENVIRONMENTS

Design Statement (9.2.26)

No.30 King Street, Gravesend, DA12 2XX

Application to convert 1st, 2nd & 3rd floors from office (former NatWest) to 5 residential units (mix of 3 x 1 bed, 1 x 2 bed & 1 x 2 bed) with entrance off Windmill Street.

Ground Floor shell off King Street to remain as existing (end user to be determined)

Introduction

We have been asked by our client, 4KIWI LTD to submit a Full Planning & Listed Building Application with regard to the above property, for the conversion of a former NatWest building into residential units at 1st, 2nd and 3rd floors, with the entrance being off Windmill Street.

As shown on the proposed ground floor plan, the main entrance and shell off No.30 Kings Street, will be kept, however a new end user will be found, and they will have the use of the basement too.

The main building facades fronting King Street and Windmill Street are Grade 2 listed and remain unchanged.

This application is further to a pre-application submitted to Gravesham Borough Council in February 2025, for which a response was received on 23rd September 2025, reference PRE.20250094.

As a result of the council feedback, we have engaged the services of a specialist Heritage Consultant, HCUK Ltd, and their Report has been submitted with this application, the contents of which have guided the amended design.

Due to the above, the number of units has been reduced from eight, all be it three of which were studio units, to what is now an application for five flats, three of which are 1 bedders, with one 2 bed unit and one 3 bed unit.



Proposed Windmill Street Elevation



Proposed King Street Elevation

Site Description

The application site consists of a four-storey building plus basement which is situated on the corner of King Street and Windmill Street and was constructed in 1889. It is Grade II listed and situated in the King Street Conservation Area and in the Gravesend Town Centre Opportunity Area.

Planning History for proposed site

Relevant Planning History

Reference: 20150884

- Application for Listed Building Consent for reconfiguration of existing branch to improve services and layout.
- Permitted 19.11.15

Reference: 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 10.1.1992

Reference: 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 26.10.87

Reference: 19870657

- Erection of extensions at the rear up to second floor level to form enclosed new staircase plant room stationery rooms and lift.
- Permitted 17.07.87

Reference: 19780422

- The installation of an internal staircase and the bricking up of an arched window at ground floor level
- Permitted 27.07.78

Reference: 19750526

- Alterations to Windmill Street elevation.
- Permitted 21.10.75

Development Plan and other related Planning Policies and Guidance

- Gravesham Local Plan Core Strategy and Policies Map, September 2014
- Saved policies in the Gravesham Local Plan First Review, November 1994; and

Other relevant policies relevant to Grade 11 listed building:

Gravesham Local Plan Core Strategy 2014:

- CS19 – Design and Development Principles
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review 1994:

- TC2 – Listed Buildings
- TC3 – Development Affecting Conservation Areas
- P3 – Vehicle Parking Standards

National Planning Policy Framework 2024:

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Other Material Considerations

- Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.
- Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant planning permission.
- Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

The following documents are relevant to the consideration of this application:

- King Street Conservation Area Character Appraisal (2009)
- Management Plan Gravesend Town Centre Conservation Areas (2009)
- SPG2 – Residential Layout Guidelines (2020)
- Design for Gravesham – Design Code (2024)
- Technical Housing Standards – nationally described space standard (2015).

Housing requirements

- The Council published a revised 5-year housing land supply statement in February 2025, it demonstrates that based on data up for the period 2024-2029, the Council can only demonstrate a land supply of 3 years.
- Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 is now out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This therefore requires that in regard to housing development, planning permission should be granted unless:
 - o The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- In determining applications for planning permission involving housing, the Council will therefore have to apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 129(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.
- Any proposed development should work with the Grade II listed building and within the constraints of preserving the integrity of the building, but allow a future, sustainable use in line with Development Plan and NPPF (2024) which requires new development to be high quality and create acceptable living conditions for future occupiers.
- The Council will therefore assess the merits of preservation but consider future use against the requirement for housing delivery when assessing the proposals against the policies in the National Planning Policy Framework (NPPF) and established local planning policy taken as a whole.

Planning Principles

- Policy CS02 (LPCS) prioritises development in the urban area as a sustainable location for development.
- The site lies in Gravesend Town Centre Opportunity Area (sub area 3.1 Town Centre). Policy CS05 (LPCS) states that within the Opportunity Area, the Council will amongst other things, support existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.
- The main part of the ground floor would still be in commercial use, subject to a new end user. The proposal for conversion of the upper floors and part of the ground floor of this building to residential use whilst retaining the main part of the existing commercial use at ground floor would therefore be compliant with Policies CS02 and CS05 (LPCS).

Key Planning Considerations

- Design, Character and Appearance and Heritage
 - Policy CS19 (LPCS) states that new development will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area.
 - Policy CS20 (LPCS) states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment, central to the regeneration of the area and the reinforcement of sense of place.
 - Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include amongst others the Borough's urban and rural conservation areas.
 - Saved Policy TC2 (LPFR) states that development involving alterations or extensions to listed buildings or affecting the setting of listed buildings, the primary consideration of the Council will be the maintenance of the integrity of the original listed building. Proposals will also need to be sympathetic to the listed building in terms of massing, scale, appearance and materials.
 - Saved Policy TC3 (LPFR) states that development will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area.

- Any removal of internal alterations proposed with the removal of existing walls and the installation of new walls are subject to the guidance of a suitably qualified Heritage consultant with accompanying Heritage Statemen, detailing the key changes relevant to:
 - o Significance of relevant heritage assets.
 - o Describe proposed works and potential impact on the listed building.
 - o Justify proposed works to ensure that important heritage assets are preserved.
 - o Photographic record of the interiors and features of existing rooms to be preserved and what can be removed.
 - o The proposed designs should be balanced with the need to comply with Building Regulations applicable for change of use for Listed Buildings, to work with a practical compliance for fire, means of escape, soundproofing etc.
 - o Existing windows would have to remain and therefor have secondary glazing.

Layout

In order to show the internal design layouts, it is important to see the changes that have been made relative to the Pre-application we submitted, and then subsequent to this, with the feedback received from Gravesham Council along with working in conjunction with HCUK, how the designs have evolved.

With this in mind, we have shown below the initial Pre-application sketches, and then the sketches working with HCUK how the scheme has evolved.

Pre-application sketches (planning reference PRE.20250094) for 8 No. units.

- Proposed ground floor showing, in particular, the removal of the main entrance stair off Windmill Street.

