



Delegated Report

Full Planning Application

Planning Application No: 20211252

Location: The Mission House 19 Royal Pier Road Gravesend Kent

Description: Application for conversion (part retrospective) from single dwelling (C3) to office (Eg(i) to include internal alterations including replacement of two doors, addition of fire-resistant pyro glass to be fitted over stained glass windows above partition door in hallway, addition of new doors and replacement of a skylight (hatch) with automatic opening vent.

Applicant: Mr Chia Shamsaddini, Clarence Wealth Management

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

- Site Location & Existing and Proposed Block Plan 01;
- Existing Floor Plans 02;
- Existing Roof Plan 03;
- Proposed Floor Plans 04;
- Proposed Roof Plan 05;
- Doors and Rooflight 06;
- Detailed Fire Strategy Report, version 3, issued 22.09.2021;
- Heritage, Design, Access and Planning Statement, by Graham Simpkin Planning ,ref JB/3337, dated September 2021
- Images of Elevations: 19 Royal Pier Road.

Relevant Planning History

20211253 Application for Listed Building Consent for conversion (part retrospective) from single dwelling (C3) to office (Eg(i) to include internal alterations including replacement of two doors, addition of fire-resistant glass to be fitted over stained glass windows above partition door in hallway, addition of new doors and replacement of a skylight (hatch) with automatic opening vent. **Pending Consideration**

19830326 Application for Listed Building Consent for alterations and repairs to the existing elevations replacement of part of the existing slate roof with a flat roof and internal alterations in connection with the use of the building as a single family dwelling, Approved 20.07.1983

19820178 Application for Listed Building Consent for the demolition and rebuilding of part of the front wall the demolition and rebuilding of the existing single storey extension on the east side of the building and elevational alterations, Approved 17.06.1982

19820179 Revised application for alterations and extensions involving the demolition of the existing single storey extension on the east side and its replacement by a new single storey extension having two bedrooms and a bathroom at ground floor level with a roof, Approved 30.04.1982

19800401 Alterations and extensions including demolition and rebuilding of part of the front wall and demolition of the existing single storey extension on the east side and replacement by garage and bathroom extension with roof terrace over, Approved 28.07.1980

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development;
- CS02 – Scale & Distribution of Development;
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills;
- CS11 – Transport;
- CS14 – Housing Type and Size
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards
- P5 – Change of Use of Buildings and Vehicle Parking Standards
- TC2 – Listed Buildings
- TC3 – Development Affecting Conservation Areas

Other material considerations

The Council has a statutory requirement under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant listed building consent for any works to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (February 2021)

- Section 2 – Achieving sustainable development;
- Section 5 – Delivering a sufficient supply of homes;
- Section 6 – Building a strong, competitive economy;
- Section 7 – Ensuring the vitality of towns;
- Section 9 – Promoting sustainable transport;
- Section 11 – Making Effective Use of Land;
- Section 12 – Achieving well-designed places;
- Section 15 – Conserving and enhancing the natural environment;
- Section 16 – Conserving and enhancing the historic environment.

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006)
- Gravesend Riverside Conservation Area Character Appraisal (2016)
- Management Plan – Gravesend Town Centre Conservation Areas

Consultations, Publicity and Representations

Consultees

KCC Heritage

The site lies within an area of multi-period archaeological potential, however, I consider it unlikely that the proposed works will have a significant archaeological impact.

I assume that your Conservation Officer will be making recommendations.

GBC – Conservation Officer

No comments received.

GBC – Town Centre Manager

‘...Whilst we recognise this request is to use the building as offices, we would point out that the Art Centre will be hosting a range of activities during the day / evening as part of its use.... My main concern would be the noise transference from the Art Centre to the Mission House.

I appreciate this is more an issue for the applicants, but thought it worth raising...’

Environment Agency

No comment made.

Neighbouring properties

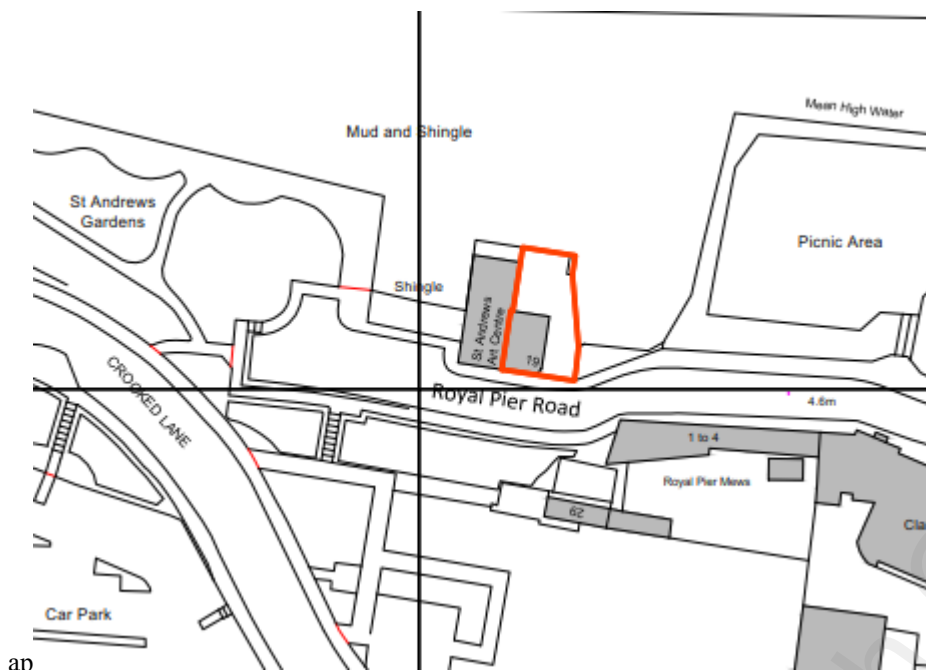
20211252 – 26 neighbouring properties were consulted plus site and press notices. Overall consultation expiry date was 24 December 2021. No responses received.

Officer's Analysis

Site Description

The application site within the Gravesend Conservation Area and accommodates The Mission House building, a three storey, grade II listed (listing 1089038) dwelling, adjacent to the St Andrew's Church Arts Centre (listing 1039109).

In addition to the Heritage character, the application site is north of Gravesend Town Centre, but within the Gravesend Town Centre Opportunity Area. The Mission House building fronts both the river Thames and Royal Pier Road.



The most recent planning history at the application site, approved the building as a single dwelling house, although, it is not clear whether the building is currently operating within the C3 use class. The plans indicate that the host property was a 5 bedroom dwelling and the application form states the use of the building for office purposes has commenced as of 24 May 2021.

As the building is listed, it is worth reviewing the Historic England's listing of the building, which is listed below;

The Mission House, 19 Royal Pier Road, Grade II Listing (Listing Entry: 1089038):

'This adjoins St Andrew's Waterside Chapel. C18. 3 storeys stock brick. Parapet with cemented eaves cornice. 2 cambered sashes with glazing bars intact. Some blanks. The ground floor has a left side doorcase with cambered fanlight and a 1 storey right side extension.

St Andrew's Waterside Chapel and No 19 form a group.'

Proposed Development

As noted above, there are heritage implications for the site, but also, the site is within the Gravesend Opportunity Area and the applicant proposes change the use of the building from residential to office use, specifically class E(g)(i) and the listed building element of the proposed changes primarily consist of internal alterations to the building.

The applicant has made it clear that there are no external alterations to the property and that the internal changes are mainly to accommodate the outcomes of the submitted Fire Strategy Report. The applicant maintains the proposed changes sought are the minimum necessary in line with fire standards.

Principle of Development

The application site is within Gravesend Town Centre Opportunity Area and, as such, Policy CS05 of the Gravesend Local Plan Core Strategy (LPCS) September 2014 are relevant, as well as, Policy CS14 since the planning application seeks to change the use of the building from residential to office use.

The site is also within a Conservation Area and contains a grade II listed building and Policies CS20 of the

Gravesham Local Plan Core Strategy (LPCS) and Saved Policy TC2 and TC3 of the Gravesham Local Plan First Review November 1994 (LPFR) are also relevant.

Policy CS05 of the LPCS (2014) states that the opportunity area will be the principal focus for the town centre related economic and social activity in the Borough. This will be achieved by consolidating the existing retail area and encouraging a mix of employment and residential uses. The Policy also supports the provision of new offices in accordance with the sequential approach, in particular, where they have good access to the proposed integrated transport network.

Policy CS07 of the LPCS (2014) states that office developments, in addition, to that allocated elsewhere be directed in the first instance to the Gravesend Town Centre, and then to edge of centre locations, including sites within 500 metres walking distance of Gravesend Railway Station and Ebbsfleet Station, in accordance with the NPPF sequential test.

Policy CS14 of the LPCS (2014) The Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties.

The property is a large, 3 storey, dwelling with a basement and 5 bedrooms fronting the Thames River at the rear. While policy CS14 resists that the conversion of family sized residential units, however, as the site is within the Gravesend Opportunity Area where LPCS policies CS05 and CS07 are broadly supportive of employment uses and specifically offices uses along the riverside boundary.

Furthermore, despite the site potentially providing family sized accommodation, the building itself is not conducive to providing a safe environment for a residential accommodation along the river bed with limited amenity space in a relatively isolated location away from other residential buildings. Furthermore, the Heritage/Planning Statement submitted indicates the building was not intended to be used for such uses. Notwithstanding, the approved housing uses from the planning history, the LPA considers given the site is within the Gravesend Opportunity Area, within walking distance of the town centre and appropriate transport links, the change of use from residential development to office use class E(g)(i) is acceptable.

Design, Character and Heritage Implications

The application site is within the Gravesend Riverside Conservation Area and the application(s) at the site seeks to i) change the use of the building from residential to office use and ii) internal alterations in line with the submitted fire strategy. In terms of the change of use of the building, this has been addressed above, but in terms of the impact to the heritage asset as a listed building and the application site being within the conservation area, it not considered the proposed change of use will have detrimental impact to the character of the conservation area or the grade II listed building.

In terms of the internal alterations to the building, Historic England description listing states;

'2. This adjoins St Andrew's Waterside Chapel. C18. 3 storeys stock brick. Parapet with cemented eaves cornice. 2 cambered sashes with glazing bars intact. Some blanks. The ground floor has a left side doorcase with cambered fanlight and a 1 storey right side extension.'

In terms of the proposed changes to the listed building, the only external changes are to the replacement skylight with automatic vent which is not visible from the public highway. The alterations are, therefore, primarily internal which mainly to replace/install fire resistant doors, fire resistant glass fitted over stain glass windows above partition for in hallway.

No adverse comments have been received from GBC Conservation Officer or KCC Heritage.

On that basis it is considered the amendments are appropriate and proposal complies with Policies CS19 and CS20 of the Core Strategy and saved Policies TC2 and TC3 of the Local Plan First Review.

Main Town Centre Uses, Vitality and Viability

As noted previously, the site is north of Gravesend Town Centre within the Gravesend Opportunity Area and the proposed change of use from residential to office use is considered a main town centre use within the NPPF (2021). Paragraph 87 of the NPPF requires the LPA to apply a sequential test to planning applications for main town centre uses which are neither in existing centres nor in accordance with an up-to-date plan. The site is not strictly within the existing town centre and the Council's Core Strategy was adopted in 2014 so not exactly an up to date plan.

Notwithstanding this, the LPA considers that the Core Strategy policies are broadly consistent with the NPPF (2021) as it encourages a mix of employment and residential uses and the provision of new offices in accordance with the sequential approach. The consistency of the LPCS (2014) with the NPPF (2021) is further demonstrated in Policy CS07 which first directs office development to Gravesend Town Centre than to edge of centre locations within 500 metres of the Gravesend Railway Station. This approach is consistent with paragraph 88 of the NPPF (2021) and the glossary definition for edge of centre.

It is acknowledged that the sequential test has not explicitly been undertaken, the LPA are of the view that given the site is situated within the Gravesend Town Centre Opportunity Area, and the office development would be approximately 650metres from Gravesend Railway Station which is slightly outside the threshold of 500 metres required by the NPPF, and the Local Plan. The proposed office development, within the grade II listed building would be appropriate in that it would provide support economic and social interaction with Gravesend Town Centre. Furthermore, the preamble of the Policy CS05, states that the Thames Riverside (where the application site is situated) significantly contributes to Gravesend's role as a Riverside Heritage Town and the Council seeks to improve public access to the riverside.

Therefore, the LPA are of the view that given the heritage value of the building and being with the Gravesend Conservation Area the proposed office development actively encourages public access to (and interaction with the Riverside). On that basis it is considered the proposal complies with Policies CS05, CS07 and CS20 of the Core Strategy and Saved Policies TC2 and TC3 of the Local Plan First Review.

Amenity of Future Occupiers and Neighbouring Amenity

The proposed change of use to office development is considered to have minimal impact to the immediate locality and the adjoining building at the St Andrew's Church Arts Centre. It should be noted the Port of London Authority and the Clarendon Hotel are within a short walking distance east of the application site. Conversely, comments were received from the GBC Town Centre Manager and raised minor concerns that there could be noise transference from the adjoining St Andrew's Church Arts Centre as there are social activities that could impact on the office environment. Although, the GBC Town Centre Manager mentions discussions have been had with the applicant regarding the activities of the Arts Centre and, therefore, there applicant is aware if the implications.

The office use at the site is currently operational and, therefore, the LPA are of the view that the activities of the Arts Centre is not likely to cause significant harm to the proposed office environment.

Overall it is considered that the proposed development, would not have significant adverse impacts on the amenity of surrounding occupiers and complies Policy CS19 (LPCS).

Highways, Traffic and Parking

The application form maintains that 10 cycle spaces will be provided within the site, however, minimal details have been provided to suggest where cycle storage would be located. In relation to the cycle provisions, the Property and Regulatory Services Manager has had sight of the application and was concerned the cycle provision at the site would be to the rear of the site and potentially obstruct the fire exits of the Arts Centre adjacent.

As little details of the cycle parking provision has been supplied with the application, the LPA has not

considered the provision of external cycle parking provisions at the site. An informative will be added to remind the applicant not to install any external cycle parking provisions without the consent of the LPA.

Saved Policies P3 and P5 of the Local Plan First Review provides states that for B1 uses the Council would expect to see car parking provisions to be at the standard for offices and requires lorry parking/manoeuvring areas to be provided. However, saved Policy P5 considers that in instances of where a change of use of the building is proposed and likely lead to the building being unused or underused, the Council may be willing to relax the parking standards provided it does not exacerbate on-street parking problems in the immediate locality.

No vehicle parking provisions are sought at the site and, within the Planning Statement, the applicant maintains that its 10 employees would be encouraged to use public transport where possible and bring bicycles to the offices. Given the proximity of the site to the town centre and the nearby transport links, the application site is considered sustainable location for an office development. In addition, there are parking restrictions within the local area and it is not considered that an office development of up to 10 staff members would create significant harm to highway safety within the immediate locality.

However, the Planning Statement supplied maintains that the application site would be used by a single end user with up to 10 employees, the building would provide approximately 191sq.m of office space and not considered the site could be subdivided in numerous other offices within the curtilage of the building. Therefore, in terms of vehicle uses at the site, it is expected these to be minimal especially given the public transport options from in/around the town centre.

Overall it is considered that the proposed development, would not have significant adverse impacts on highway or pedestrian safety and complies Policy CS11 (LPCS) and Saved Policies P3 and P5 of the Local Plan First Review.

Flood Risk

The site is within Flood Risk Zone 3, the highest flood risk and the Environment Agency (EA) has been consulted on the application and has no comment on the application.

Paragraph 168 of the NPPF states that applications for some minor development/changes of use should not be subject to the sequential or exceptions tests but still meet the requirements for site specific flood risk assessments.

PPG guidance maintains that extensions for non-residential development with a footprint less than 250sq.m and alterations that do not increase the size of the building are considered minor developments. Therefore, it is deemed that minor developments are unlikely to raise significant flood risk issues. Also, in terms of changes of use, PPG guidance, mentions the criteria to consider the flood risk implication appears to be where there is an increase in flood risk vulnerability classification. However, as the application seeks a change from residential to office use (i.e. more vulnerable to less vulnerable use), Table 3 for Flood Risk Classifications in PPG, lists that development is appropriate on less vulnerable land.

Therefore, in terms of Flood Risk, as the EA has responded to the application with a 'no comment', the LPA takes the view that the proposal is an appropriate development within Flood Risk Zone 3, as the proposed change of use constitutes a less vulnerable use.

Any Other Material Planning Considerations

It is acknowledged that a fire strategy report has been submitted to inform the internal alterations of the listed building. However, the LPA has considered this application on the planning/listed building merits of the change of use/internal alterations proposed and not the appropriateness of the internal alterations in terms of fire safety. An informative will be added to the decision notice, should the application be recommended favourably, that application has not considered the appropriateness of the fire safety alterations.

As noted above, the application mentions there would be cycle provisions made at the site, but makes no explicit reference on the plans. Also, of relevance here, is the legal agreement in place at the application site, where there are obligations for the owners of the site to maintain the right of egress from the adjacent Arts Centre through the eastern rear wall using the rear garden of The Mission House along the designated escape route. The legal agreement has obligations for both the Council, as the owner of the adjacent Arts Centre, and the owners of The Mission House site. An informative will be added to remind the applicant of the legal agreement in place at the site.

Conclusion & Recommendation

Approve, subject to conditions

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Genna Henry	Team Leader:	Richard Hart
Signed:	<i>G. Henry</i>	Signed:	<i>R Hart</i>
Dated:	30 December 2021	Dated:	30th December 2021