

15th July 2022

Gravesham Borough Council
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Dear Sir/Madam

RE: Gravesend – No 17 Darnley Road Kent DA11 0RZ
Planning Application for subdivision of No. 17 Darnley Road into three self-contained dwellings with associated external alterations and amenity space

Background

We are instructed on behalf of Mandeep Hayer to submit a full planning application to subdivide the existing terraced, three storey dwellinghouse into three self contained units with associated amenity space

In support of this application, please find enclosed:

- Completed application forms and relevant ownership certificate;
- Site Location Plan;
- Existing Floor Plans and Elevations Ref 22-1421-01;
- Proposed Floor Plans and Elevations Ref 22-1421-02A;

In addition to the above documentation, this letter provides a detailed assessment of the key planning issues and should therefore be taken into consideration in the determination of the planning application.

Site and Surroundings

The application site comprises a 3 storey mid-terrace property with habitable floorspace within the basement and roof space located on the eastern side of Darnley Road. The dwelling was has been most recently occupied as a single seven bedroom family house.

Adjoining the property to the south at No. 19 Darnley Road is Lewis Solomon Funeral Directors which benefits from a number of rear extensions. Importantly, to the north of the property lies No. 15 Darnley Road which has been subdivided into one maisonette and two bedsits under application Ref 19880982.

To the east the site benefits from a large, landscaped amenity area beyond which lies the Rathmore Road Public car park. Pedestrian access is proposed to be retained as existing to the west off Darnley Road.

The surrounding area is varied in character with a range of residential and commercial units befitting of the sites edge of town centre location. Importantly the site also lies within the Darnley Road Conservation Area.

A selection of site images are included below.



Image 1: No. 17 Darnley Road as pictured within the wider terrace between No. 15 and Darnley Road

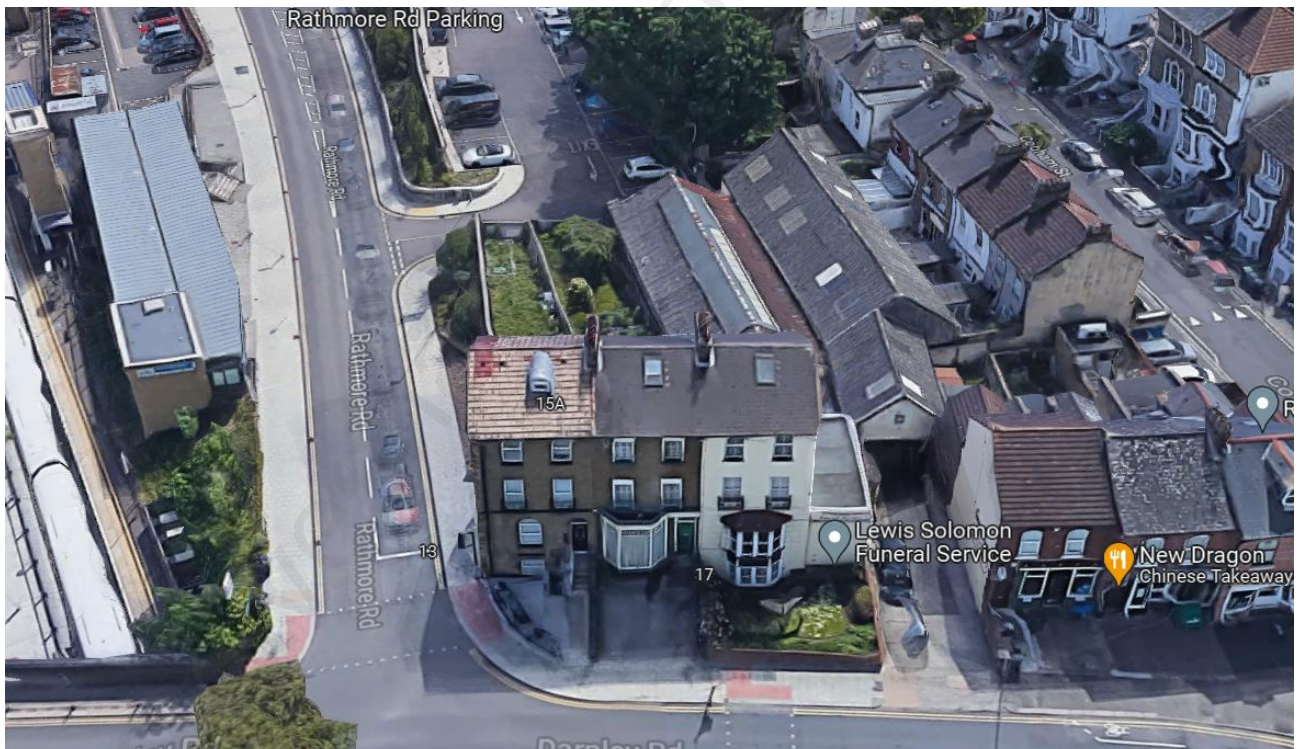


Image 2: Overhead view of the site facing eastwards within the wider terrace



Image 3: Overhead view of the site, and the rear amenity area facing westwards



Image 4: Entrance to the large Rathmore Road car park to the rear of the site

Planning History

A review of the Council's online planning system has been undertaken, as a result no applications of relevance have been found.

Proposed Development

Against this background, a full planning application has been prepared which proposes to subdivide the existing single dwellinghouse into three self-contained residential units.

This will enable the creation of a 3 bedroom/5person flat at lower ground and ground floor level, a 1 bedroom/1 person studio at first floor level and a 1 bedroom/2 person flat at second and roof level.

Planning Policy

The National Planning Policy Framework (NPPF) requires the Council to make the most efficient use of land by maximising the use of previously developed land and conversion of existing buildings.

The development Framework currently consists of the Gravesham Local Plan Core Strategy (September 2014) which is supported in turn by a number of Supplementary Planning Guidance Documents and importantly the Darnley Road Conservation Area Appraisal.

Policy CS11 (Transport) states that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

The Council will support proposals which improve public transport provision and facilities in the Borough. In particular it will:

- Seek to maintain and expand, where justified, segregation lanes for Fastrack and existing bus priority measures elsewhere;
- Require key sites to include provision for buses;
- Support the development of transport hubs at Gravesend Town Centre and Ebbsfleet (in Dartford Borough Council area) to provide high quality interchange facilities between bus, rail, walking and cycling; and
- Ensure an adequate supply of public car parking.

The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate.

Policy CS14 (Housing Type and Size) Outlines that 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 Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Policy CS15 (Housing Density) States that sites will be developed at a variety of densities depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site.

All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is located. Subject to this overriding consideration:

- Within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport hubs of Gravesend Town Centre and Ebbsfleet, higher densities will be sought.

Policy CS19 (Development and Design Principles) Outlines that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well within the surrounding local area and meet anti-crime standards. As achieved through the following standards:

- The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines.

Policy CS20 (Heritage and the Historic Environment) States the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay, or other threats. Securing viable sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

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:

- Gravesend Town Centre, its development as a heritage riverside town, and its setting;
- The Borough's urban and rural conservation areas; and
- Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Other Material Considerations

Also of relevance to this application is the Council's housing provision, notably in terms of housing land supply over the forthcoming five years and delivery over the last three years.

Gravesham's five year housing land supply statement 2020-2025 was delivered in January 2021 and sets out how Gravesham intends to deliver five years worth of deliverable housing land to meet its housing need over the same five years. A deliverable supply of 2,574 homes was identified within the Borough to meet an identified need of 3,930 homes. This results in a significant shortfall of 1,356 homes over the next five years and as a result a deliverable supply of just 3.27 years can be achieved.

As a result Gravesham cannot demonstrate a five year housing land supply.

With regard to housing delivery the Housing Delivery Test (2021) states that for the three years preceding 2021 there was a requirement of 1,154 homes in the Borough. Importantly, Gravesham could only deliver 661 homes over the same three years, just 57% of its requirement.

As a result Gravesham has now enacted the presumption in favour of sustainable development as outlined at paragraph 11 of the NPPF and local plan policies may now be considered out of date.

Planning Issues

Principle of Development

As an existing residential property it is considered that the principle of subdividing the property into three apartments is acceptable, especially so given the retention a 3 bed/5 person family sized dwelling at ground floor level. Subject to their being no unacceptable impact upon the Darnley Road Conservation Area.

Design and Impact upon Neighbours

The application proposes no external alterations and as such is not considered to have an unacceptable impact upon the amenity of neighbours.

Residential Living Environment

The proposed scheme has been designed to provide a high quality living environment for all occupiers.

As demonstrated on the enclosed floorplans, each habitable room will be served by at least one window to ensure acceptable outlook and sunlight/daylight for residents.

Whilst Flat 2 does fall 3 sqm short of the Nationally Described Floorspace Standards the unit does benefit from being dual aspect and in close proximity to a range of outdoor amenities including: Gravesend Cricket Club (0.3 mile/6 minute walk); Dashwood Park (0.5 mile/10 minute walk); Woodlands Park (0.7 mile/13 minute walk); Windmill Hill Park and Gardens (0.5 mile/10 minute walk); Old Gravesendians Rugby Football Club (0.7 mile/14 minute walk); Riverside Leisure Park (0.6 mile/13 minute walk).

Notably, the site is also located less than 0.1 mile from Gravesend Railway Station and is well located for both regional and national public transport connections.

On the basis of the above assessment, our view is that a sufficiently high quality living environment for residents will be created in accordance with Policy CS19.

Parking

As stated previously the site benefits from being in a highly sustainable location in close proximity to both Gravesham Railway Station (0.1km) and the arterial Bus Stops of Barrack Row and Garrick Street (0.1 km).

The site is also located directly adjacent to Gravesham Town Centre and as such benefits from being in extremely close proximity to a large range of amenities including a hospital, medical centre, church, shopping centre and a wide ranging retail offer.

Additionally it is noted that the large Rathmore road public car park is located directly to the east of the site.

As such it is not considered that there would be an unacceptable impact on highway safety, or a severe residual cumulative impacts on the road network.

Next Steps

We look forward to receiving confirmation of receipt and registration of the application, however, in the meantime if you require any further information or have any queries in respect of the submitted documentation, please contact the undersigned in the first instance.

Yours sincerely



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Gravesham Borough Council