

3.0 Evaluation

3.1 Planning Policy

A Planning Statement will be submitted by Barron Edwards which will detail the sites adherence to current national and local planning policies as well as how the scheme complies to local policy set out in Gravesend Local Plan Core Strategy.

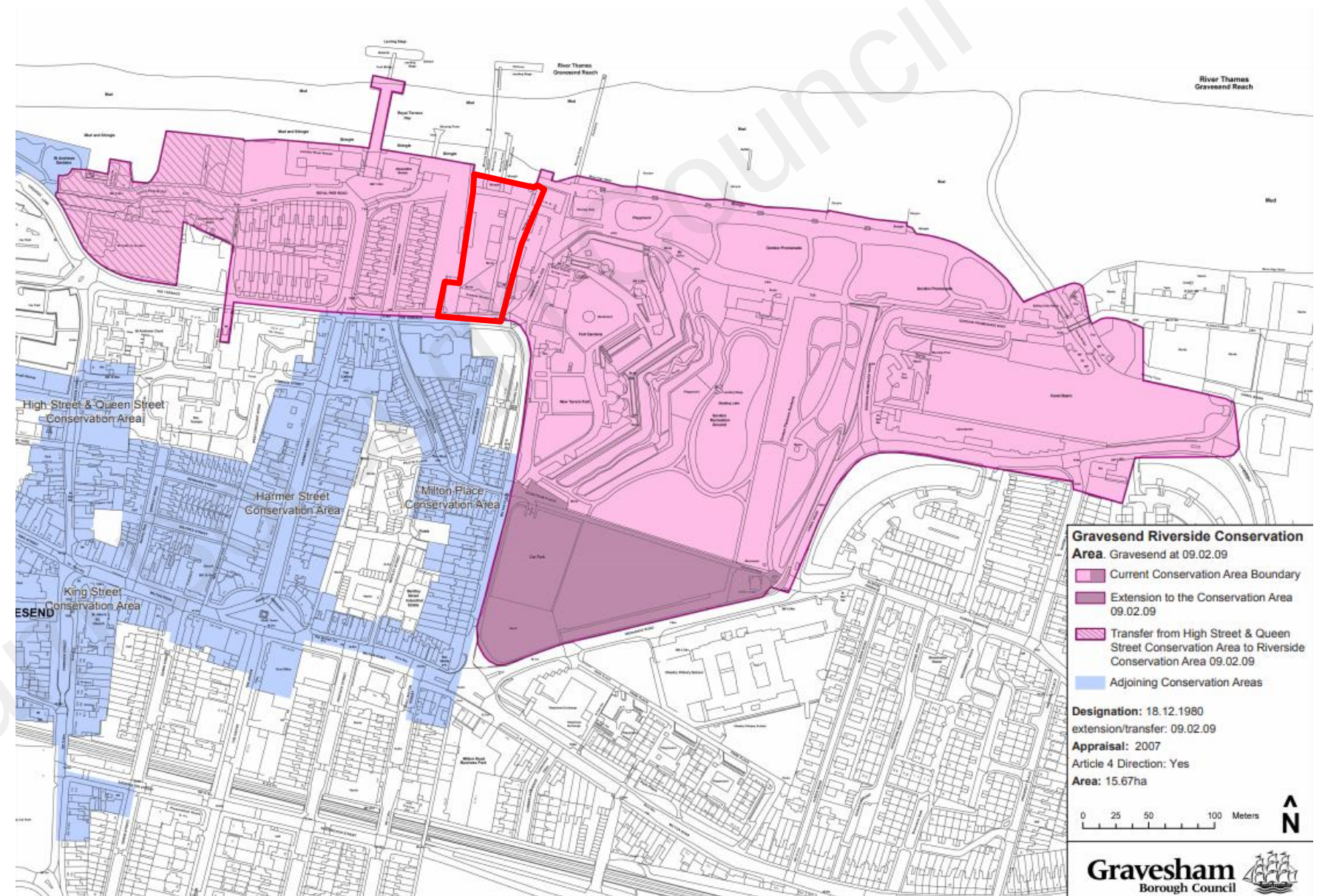
The sites inclusion in the Gravesend Riverside Conservation Area and The Thames Estuary 2100 project both warrant a brief description.

Custom House is listed as a principle landmark in the Gravesend Riverside Conservation Area and is noted for its historic character. The description reads as below:

Custom House has the stern demeanour of an early 19th century government building and stands close to the pavement edge, commanding its corner location over three storeys. It is built of plain brown stock brick and has retained handsome original doors and windows with simple historic details such as a stone stringcourse and cornice.

The development site is located in Character Area 1 : Royal Pier Road and The Terrace. The principal features of the built form in this character area are:

- Urban riverside character;
- Cohesive qualities of two storey terraced buildings, dating from the later 19th century and early 20th century;
- Landmark early 19th century Custom House;
- Continuous building line on the back of the pavement or behind front gardens;
- Mainly a "domestic" scale of building;
- Use of red and yellow brick;
- Large modern blocks: office and residential uses;
- Sash windows, retaining their original glazing pattern and divided into small panes or with central glazing bars, giving a predominantly vertical emphasis.



Extract from GBC Gravesend Riverside Document

Negative features/issues were listed as character as;

- Loss of original architectural features, notably some iron railings on The Terrace, replacement slate roofs, replacement of timber doors and windows with uPVC
- Lack of continuity of the public realm, pavement surfaces;
- Impact of overlarge residential developments on the edge of the Conservation Area (e.g. Chantry Court);

- Some use of unsympathetic materials in 20th century development, i.e. concrete blocks and aluminium windows on Alexandra House
- Poor state of remaining features of the former Terrace Gardens, i.e. parapets at Royal Pier Road,

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3.1 Planning Policy

Thames Flood Defence / Flood Walls

The northern boundary of the site is formed by a 2.75m high flood defence wall, it is punctured by a 5m wide flood gate with associated operating machinery and an access stair towards the walls centre. The sea defence prevents views of and easy pedestrian access to the Thames waterfront. The aspiration of this development is to improve the sites relationship with the Thames, and to provide a new welcoming pedestrian link between the Terrace and the river.

The Environment Agency is responsible for Thames flood defences with regional and local authorities responsible for ensuring flood risk is taken into account during the planning process.

In 2002 the Environment Agency established **The Thames Estuary 2100** project with the aim of developing a strategic flood risk management plan for London and the Thames estuary through to the end of the century. The Plan primarily looks at tidal flooding, and there was an understanding that many of the existing flood walls, embankments and barriers were getting older and would need to be raised or replaced to manage rising water levels.

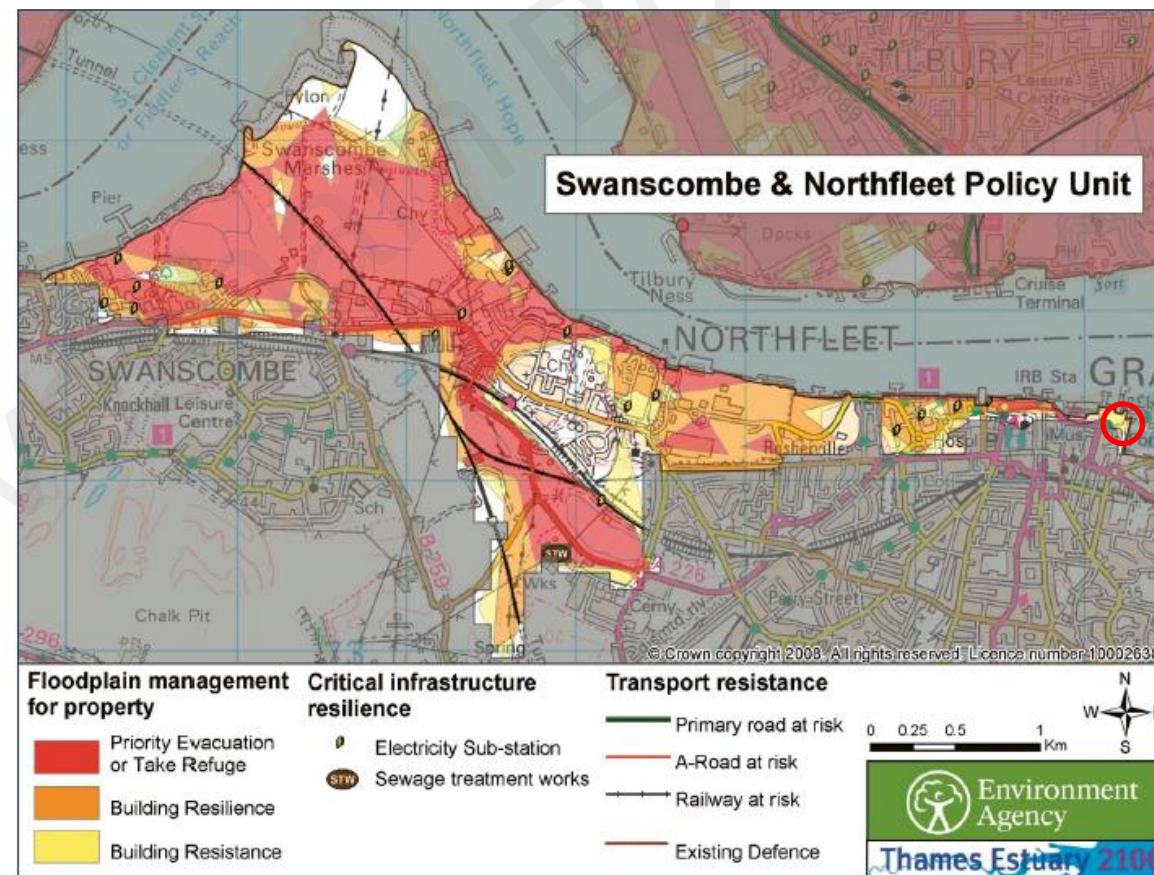
Gravesend falls within local Action Zone 5 with a Policy P4 flood risk management policy. To meet the 2100 objective the existing flood barriers on site may require raising in height. This needs to be confirmed with the Environment Agency.

The vision for Action Zone 5, Middle Estuary is as set out in the TE2100 Plan below:

There are opportunities to combine improved arrangements for flood risk management in this area with the creation of green space on the Swanscombe peninsula. This could be developed to promote closer links between the floodplain and the Estuary in Northfleet and Gravesend. There is also a need to work with planning authorities to create a plan that fully integrates flood risk management with new developments, new amenity areas and new/improved conservation areas.



Action Zone 5 - Middle Estuary
TE2100 gives all these policy units a P4 flood risk management policy.



At risk in Swanscombe and Northfleet Policy Unit



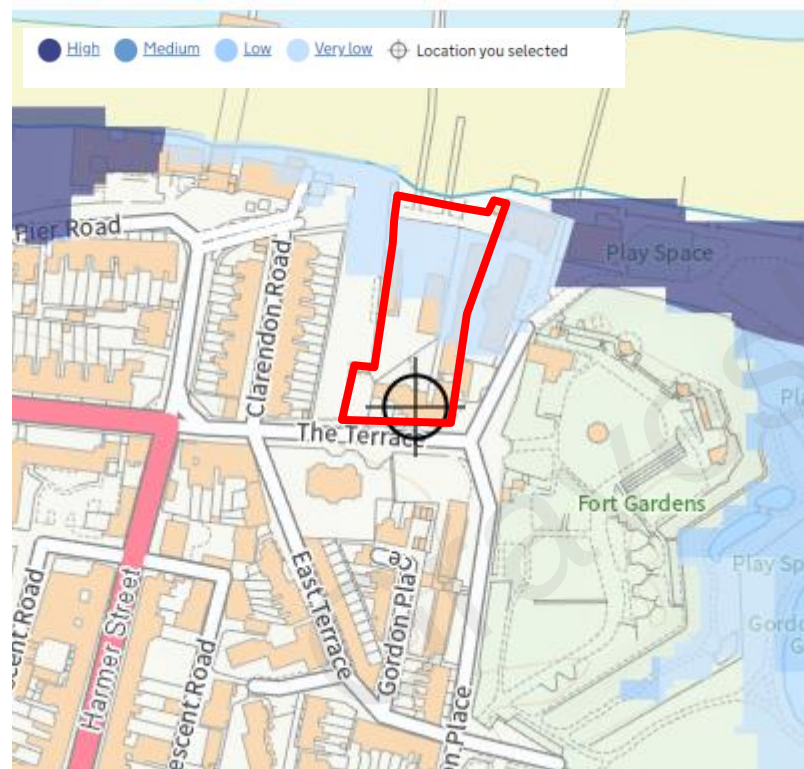
Photograph showing Sea Defence wall with blue flood gate and access stairs visible.

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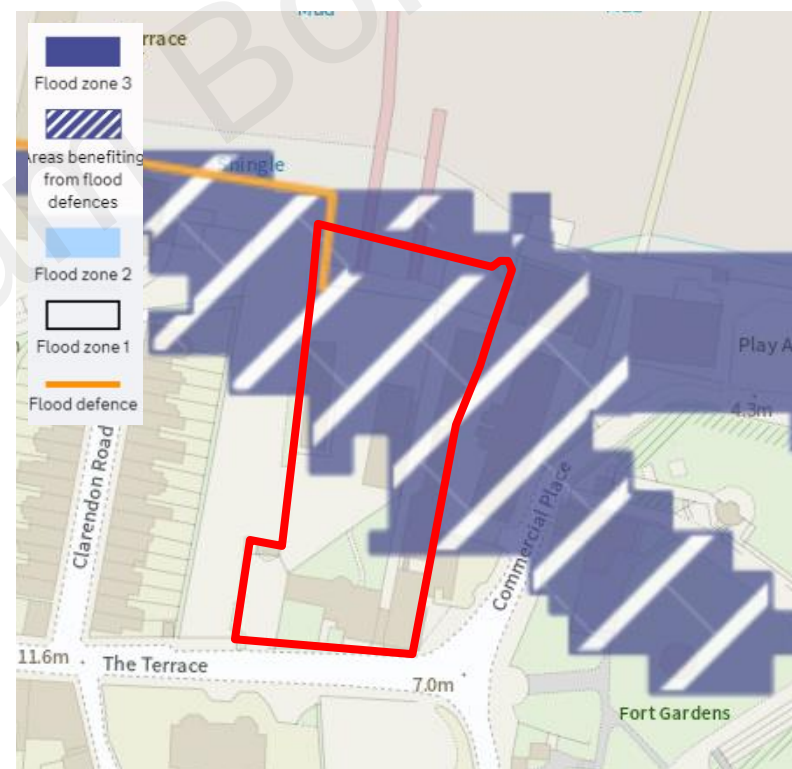
3.1 Planning Policy

The site is partially located in Flood Zone 3 and benefits from existing flood defences which are designed to currently provide a 1 in 1000 year standard protection. The risk of flooding to the site from all sources is identified as low risk, particularly due to the flood defences along the River Thames which run along the northern boundary of the site. However a worst case scenario showing how the site may be affected by flooding were the sea defences to fail has been modelled by the EA, with the maximum flood level at the site predicted to reach 6.32m AODN.

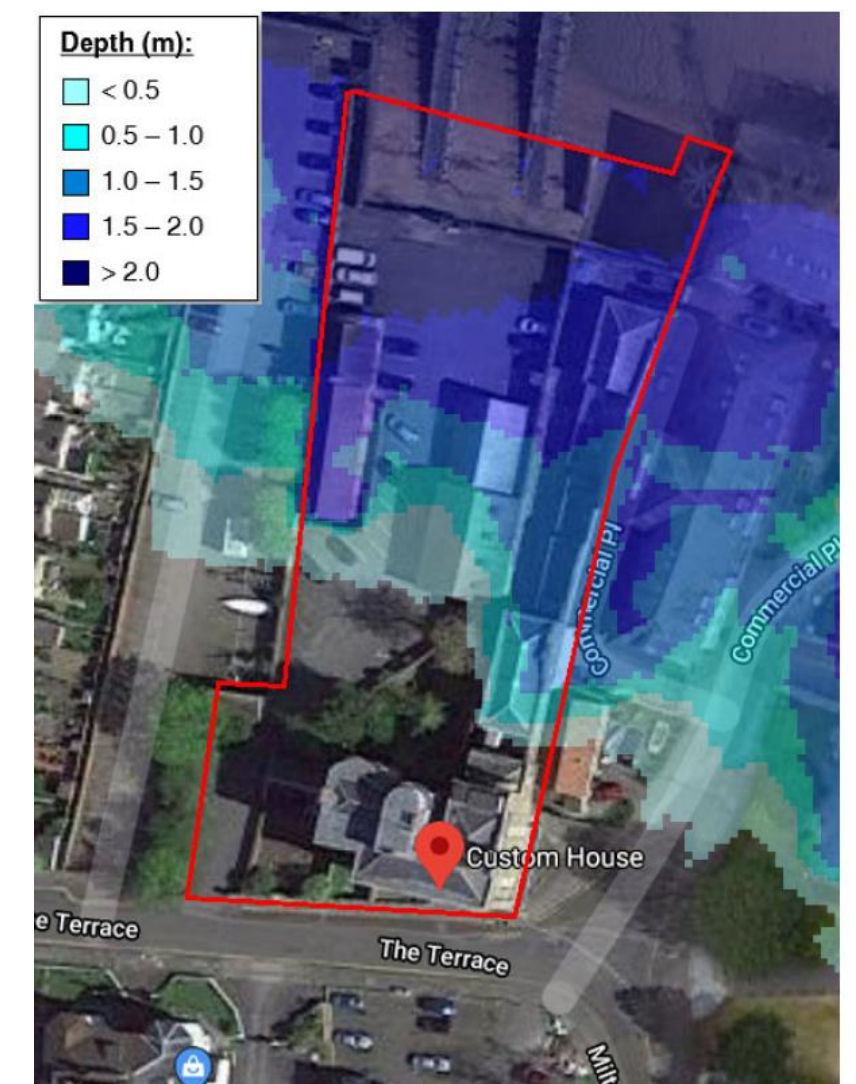
Herrington Consulting Ltd, the flood risk consultants, have been in contact with the EA and have agreed that the finished floor levels for the sleeping accommodation to all proposed units will be set above 6.92m AODN. The proposed buildings will be retrofitted where appropriate to be flood resistant and resilient in line with the design guidance specified in the document 'Improving the Floor Performance of New buildings: Flood resilient construction'. SuDs will be utilised in accordance with the Non-statutory Technical Standards for SuDS and requirements of the LLFA. Refer to the Flood risk Assessment produced by Herrington Consulting Ltd for further details.



EA Flood Risk Map for Planning



EA Flood Zone Map for Planning



Maximum depth and extent of flooding resulting from a breach in the Thames defences for a 1 in 200 event.

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3.2 Planning History

Pre-Application advice was sought on a 29-unit residential redevelopment of the Custom House site in March 2020 on a scheme prepared by Barron Edwards.

The scheme proposed to redevelop the site through the refurbishment of Custom House and associated out buildings with the addition of a 2-storey extension along part of the eastern boundary wall.

The 29 residential units comprised of 18no. 2-bedroom apartments, 8no. 1-bedroom apartments and 3no. 3-bedroom apartments. The dwellings were distributed as shown in the tables opposite.

In the pre-app response the planning officer noted that some of the 1 bed and 2bed flats fell short of the minimum floor areas under the technical housing standards.

Externally open space / amenity space standards must be met, the PO estimating that at least 300m² amenity space (8% of the site) would be required for this pre-app scheme as a minimum.

CUSTOM HOUSE

FLAT	AREA (sqm)	UNIT TYPE
1	73	2B
2	85	2B
3	68	2B
4	77	2B
5	105	2B
6	113	2B
7	70	2B
8	66	2B
9	78	2B
10	65	2B
11	48	1B
12	137	3B
13	56	1B
14	70	2B
15	65	2B
16	67	2B
17	65	2B
18	93	3B

	CUSTOM HOUSE
	WORKSHOP
	BOATHOUSE
	PROPOSED EXTENSION

PROPOSED EXTENSION

FLAT	AREA (sqm)	UNIT TYPE
19	69	2B
20	45	1B
21	49	1B

WORKSHOP

FLAT	AREA (sqm)	UNIT TYPE
22	92	3B
23	59	2B
24	59	2B

BOATHOUSE

FLAT	AREA (sqm)	UNIT TYPE
25	69	2B
26	50	1B
27	50	1B
28	51	1B
29	51	1B

	Total
Custom House	18
Workshop	3
Boathouse	5
Extension	3
Total	29



PRE APP - Proposed Plan Legend

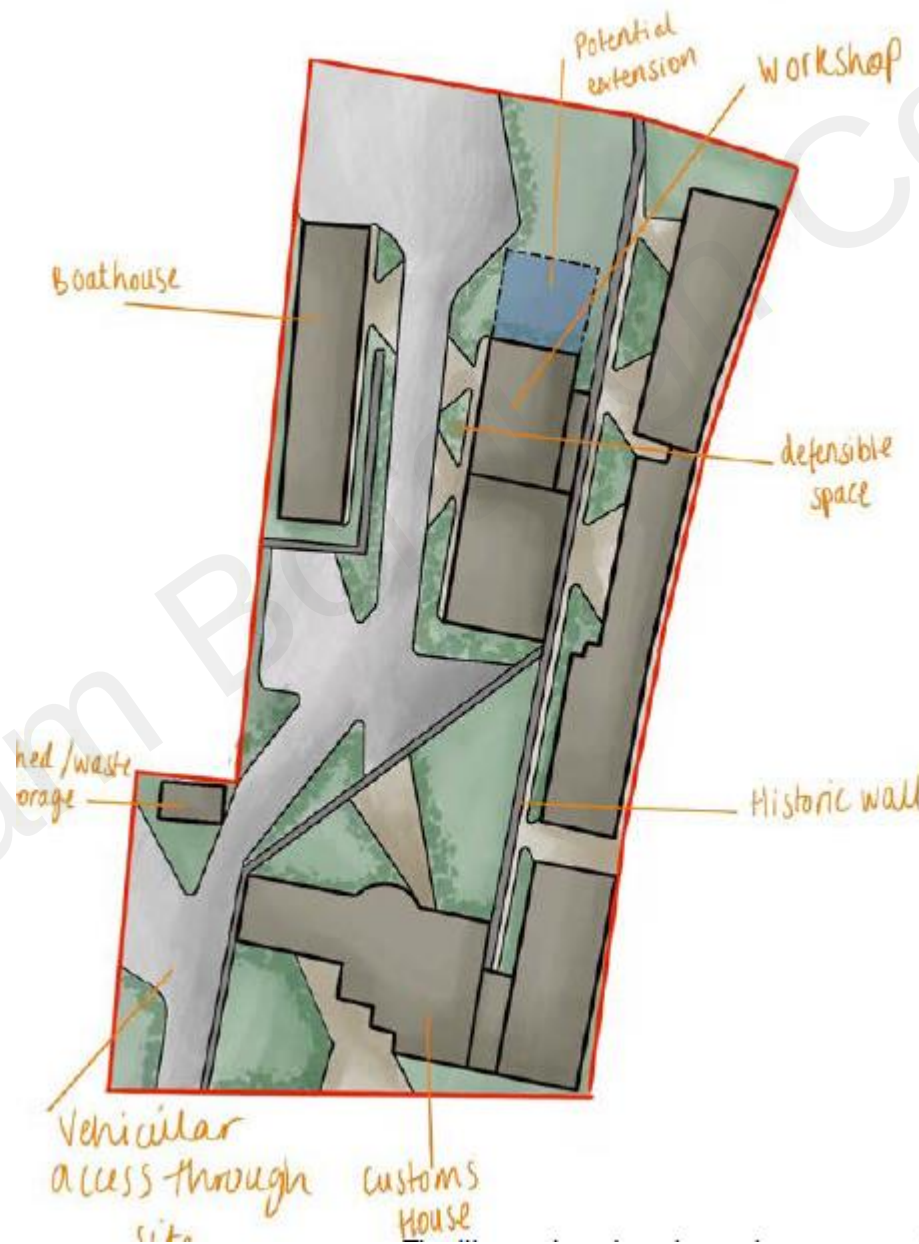
PRE APP - Proposed Accommodation Schedule

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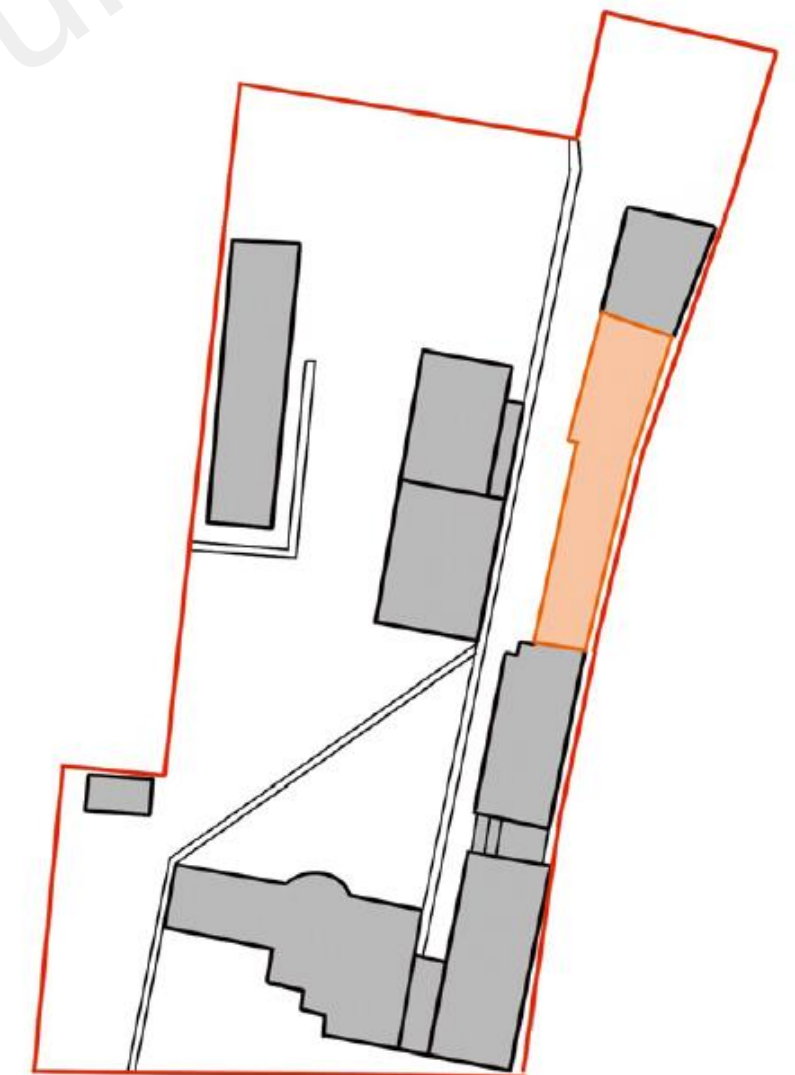
3.2 Planning History

The key objectives of the Pre-Application was to seek clarification on the following three questions:

1. **The principle of conversion to residential use**
 - The planning officer stated that this may be acceptable in principle.
 - It was noted however, that Policy CS07 requires that there is no demand for B1 offices through an appropriate marketing exercise carried out in accordance with Council guidance. The PO advised that the evidence provided at pre-app was incomplete.
 - The PO acknowledged that other planning policy supports the conversion of the building to residential eg. Housing supply delivery and sustainable location.
 - The PO stressed that the development must add to overall quality of the area, be visually attractive and sympathetic to local character NPPF PG 127-130 and CS19 and CS20
 - A clear understanding of the history of the site imperative, with the PO stating that the residential scheme must fully respect the character and appearance of the Grade II listed building located within a conservation area.
- 1.A **The potential for an extension**
 - The potential for extension(s) was not ruled out or supported by the PO at Pre-app. Extensions would need to be justified and their impact externally to the site and on the character and appearance of the listed building would need to show no harmful effects.
 - Details of how the conversion would respect the fabric and interior details of the listed building and whether layouts could preserve key features would be required.



PRE APP - Proposed Site Plan



PRE APP - Proposed Concept Plan

3.0 Planning

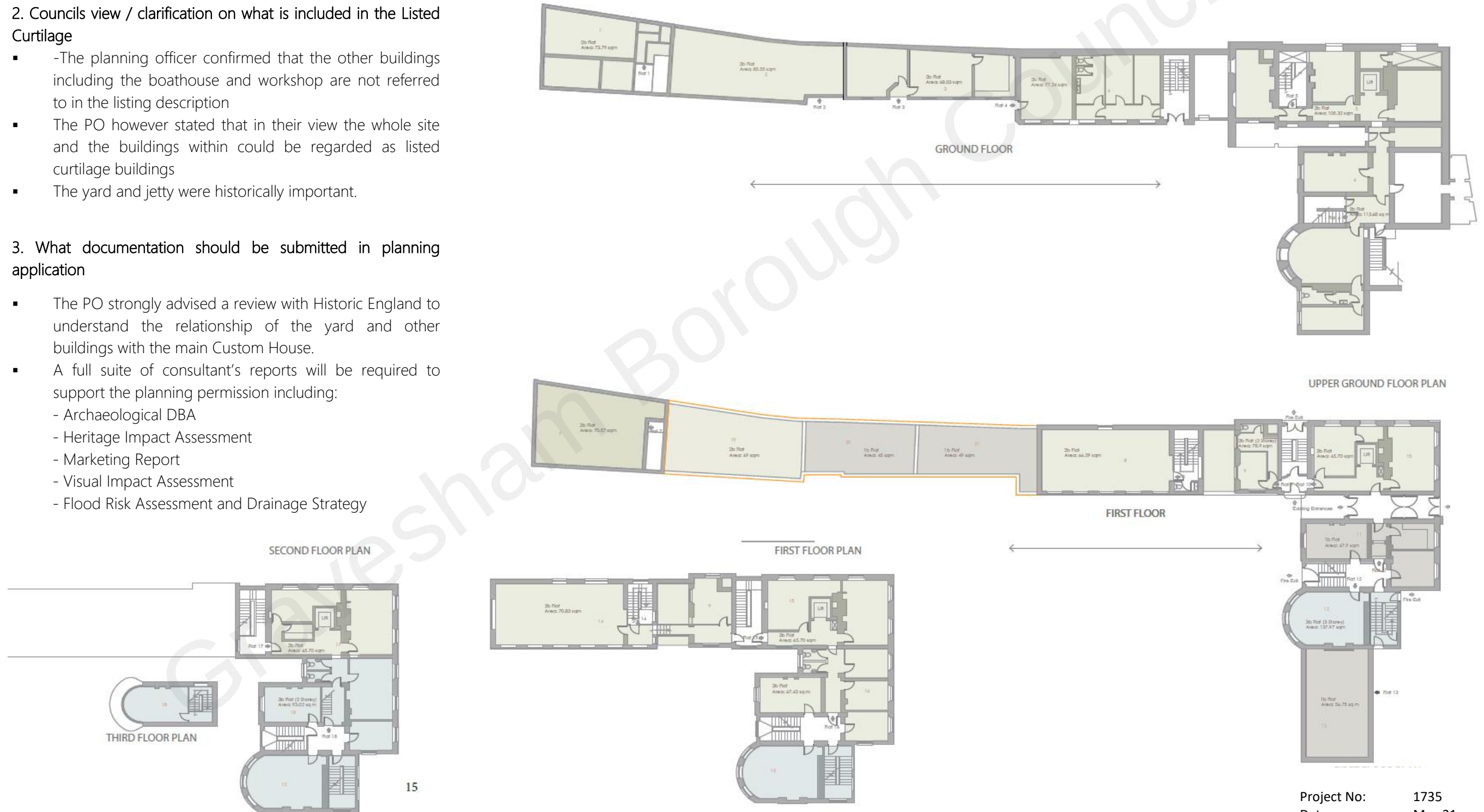
3.2 Planning History

2. Councils view / clarification on what is included in the Listed Curtilage

- The planning officer confirmed that the other buildings including the boathouse and workshop are not referred to in the listing description
- The PO however stated that in their view the whole site and the buildings within could be regarded as listed curtilage buildings
- The yard and jetty were historically important.

3. What documentation should be submitted in planning application

- The PO strongly advised a review with Historic England to understand the relationship of the yard and other buildings with the main Custom House.
- A full suite of consultant's reports will be required to support the planning permission including:
 - Archaeological DBA
 - Heritage Impact Assessment
 - Marketing Report
 - Visual Impact Assessment
 - Flood Risk Assessment and Drainage Strategy



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3.3 Surrounding Applications

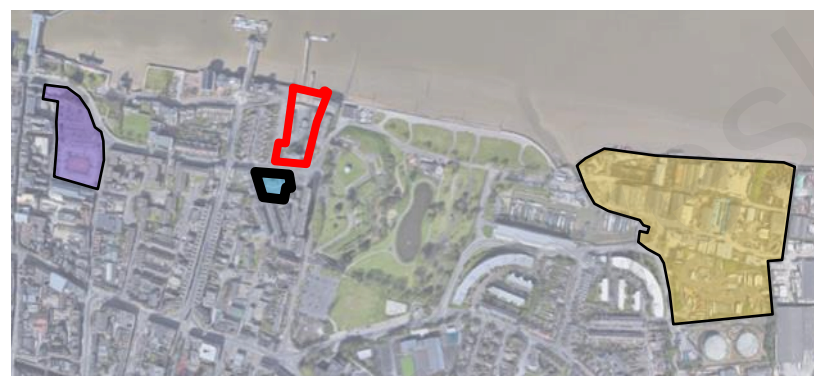
The most relevant recent planning approval is the adjacent approved scheme Cox House, planning reference 20180651 which was permitted as a major development on 25.07.2019.

The approved scheme proposes the conversion of the existing property and the construction of 2no. two-storey side extensions to provide, 7no. two-bed flats, 4no. one-bed flats, 2no. two-bed mews dwellings and 13 car parking spaces.

Cox House built in 1782 and was originally called Whitehall Place, the home of the original custom house. A change of use from B1 Offices to C3 Residential was approved in July 2019. However the building had previously (sometime before 1866) been converted into residential use and remained so for a 100 year period before returning to office use.



COX HOUSE - Annotated 3D Visualisation



- The Charter; (Phase 1) ref. 20210305.
- Albion Waterside; ref. 20210270
- Cox House; ref. 20180651
- Surrounding Application referenced on current page
- Application Site Boundary



COX HOUSE - Proposed Site Plan



COX HOUSE - Photograph

3.0 Planning

3.3 Surrounding Applications

Two further neighbouring schemes are worth noting due to their close proximity to the site, their provision of residential homes and for their sheer scale.

Albion Waterside

The master plans give extensive access to the waterside, with a Riverside Walk, a greener environment with energy efficient buildings, including up to 1500 new homes, circa 4,500m² of commercial space and a new mobility hub, promoting sustainable modes of transport to and from the site.

Joseph Homes are bringing forward the regeneration of Albion Waterside and submitted a hybrid planning application, reference 20210270, in February 2021. Part A is for full planning for a mixed use development comprising of residential and commercial floorspace and Part B is for an outline planning application.



- The Charter; (Phase 1) ref. 20210305.
- Albion Waterside; ref. 20210270
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ALBION WATERSIDE Proposed 3D Visuals and Site Plan

3.0 Planning

3.3 Surrounding Applications

The Charter, Gravesend Town Centre

'The Gravesend Masterplan is designed to re-engage the town centre with the river, bringing focus back to the historic High Street and the grade II* listed St George's Church. The scheme is an example of targeted and sensitive regeneration within a small town setting which reacts to the challenges of the rapidly changing relationship between uses within our town centres. The challenge is to deliver a scheme of significant scale which sits comfortably within its heritage setting. The first phase of the development, which achieved planning permission in July 2020, delivers 242 residential (PRS) units and car parking and is progressing on site. The second phase forms an extension to the existing St George's Shopping Centre, for which LJA has completed a comprehensive refresh.'

Extract from Leslie-Jones Architects website above.

The first phase of development, providing 242 residential homes was recently approved under application reference 20210305.



- The Charter; (Phase 1) ref. 20210305.
- Albion Waterside; ref. 20210270
- Cox House; ref. 20180651
- Surrounding Application referenced on current page
- Application Site Boundary



THE CHARTER Proposed 3d Visuals

4.0 Evolution

4.1 Opportunities and Constraints



Legend

- Site Boundary
- Listed Buildings
- Current Built Environment
- Historic access route to be retained
- Desire line from The Terrace to the Thames
- Existing access through opening in Spine Wall
- Existing access onto flood defense wall
- Design to avoid privacy and over shadowing issues between Heritage Quay and proposal.
- Elevation of adjacent Heritage Quay with no windows / lift or stair core
- Potential over shadowing issues between modern workshop and outbuildings.
- Potential to demolish low value modern Workshop in centre of site.
- Denotes the approximate area that had in the past seen significantly taller buildings located, potential to extend the outbuildings.
- Potential to enhance the appearance of the site entrance which fronts The Terrace in the Riverside Conservation Area
- Key historic building frontage within Conservation Area context
- Existing historic walled garden to be retained
- Opportunity to enhance access to Thames Riverside
- Approx. Location of Existing Tree to be retained.



4.0 Evolution

4.1 Opportunities and Constraints

The applicant site presents a large range of opportunities as well as several constraints, the most pertinent of which are listed below with a brief explanation on how each has been carefully considered and will be appropriately dealt with during the design process.

Listed Buildings

A broad understanding of Custom House's distinctive qualities will be essential to ensure that the conversion is respectful and sympathetic. The Heritage Report will establish which existing features and parts of the existing fabric can and should be retained, how the building functioned in the past and how the rooms, and different buildings, connected with one another. A conversion strategy for each element of the building fabric and interior details of Custom House and its associated outbuildings will be developed. In the case of Grade II listed Custom House and the Gazebo the design intent will be to conserve and refurbish the existing fabric of the buildings with minimal alterations proposed to the main heritage assets.

Key street frontage in Conservation Area

The principle elevations of Custom House, the south and east elevations are by far the most visible from outside the site, addressing The Terrace and Commercial Place respectively. The significance and prominence of these principle elevations will be given appropriate consideration in the design process together with the historic context in which they sit.

Historic Access Route

The long and narrow route that runs from the rear of Customs House to the flood defence wall (previously to the Thames), set between the outbuildings and the internal spine wall is of significant historic importance. The conservation of this route both physically and visually will be an important design intent with the potential for enhancement and unification explored.



Photograph of historic access route, looking south.

Site entrance and impact on The Terrace

The current site entrance, located on the northern side of The Terrace and within the context of the Riverside Conservation Area presents opportunity for enhancement. It is the design intent to improve the aesthetics of the site entrance, to reinstate and enhance the streetscape and provide a more welcoming environment that is both suitable and respectful of its context.



Photograph of current entrance from The Terrace

4.0 Evolution

4.1 Opportunities and Constraints

Thames Riverside

The way in which the development addresses the River Thames and balances flood risk management with the enhancement of the riverside area is an important consideration. The riverside area is currently separated from the rest of the application site by the flood defences and safe and appropriate access to the riverside will need consideration. It is the intention that the appearance of the riverside will be enhanced and the area brought back into use through the provision of a communal facility, linked to the Gazebo heritage asset.



Photograph of Thames Riverside area, and flood defences.

Relationship with adjacent Heritage Quay

The adjacent residential Heritage Quay is parallel to the eastern flank wall marking the boundary of the applicant site. The distance between the flank wall and the main elevation of Heritage Quay is approximately 8.5m, with the windowless circulation core being closer in distance. Any alterations to the outbuildings that abut the flank wall will carefully consider the neighbouring Heritage Quay and ensure that the current level of amenity, in terms of daylight, privacy and overlooking, of the residents is maintained.



Photograph of Heritage Quay and Outbuildings

Access to the River Thames

The natural desire line from The Terrace to the Thames Riverside will be incorporated into the design of the site layout and landscaping.

Potential to open up the centre of the site

The opportunity to remove the modern, mid 20th century addition, 'The Workshop' that sits in the centre of the site will be explored. The removal of this building will enable the centre of the site to be opened up, with the opportunity to provide a green, communal focal point. The demolition of the modern Workshop could also benefit the outbuildings through increased light levels and an enhanced outlook and would lead to a significant length of the historic spine wall to be re-exposed.



Photograph of modern Workshop

Historic Walled Garden

The triangular historic walled garden and all existing trees will be maintained and enhanced as part of the site landscaping and green amenity space strategy.

4.0 Evolution

4.1 Opportunities and Constraints

Eastern Flank Wall

The northern half of the eastern boundary is bordered by a two-storey high blank, flank brick and rendered wall which forms the rear wall of the Outbuildings. In the past however, this wall was rather the elevation of a taller building which was articulated by fenestration and formed part of the street scene. The opportunity to increase the height and massing of the outbuildings along with an evaluation of the appropriate scale of any extensions within the current context will be explored in the design process.



1920 Photograph of site context with Royal Terrace Pier



Current Photograph of site context with Royal Terrace Pier

4.0 Evolution

4.1 Opportunities and Constraints



1920 Photograph of bonded warehouses along flank wall.



Current Photograph showing Custom House and eastern flank wall