

Pre Application Response

Reference	PRE20250113
Site	125 Wellington Street, Gravesend, Kent DA12 1JE
Proposed development	The sub- division of the ground floor into a one bedroom, one person flat and a two bed, three person flat; the first floor a one bed, two person flat.
Case Officer details	Mr Thomas Gabriel thomas.gabriel@gravesham.gov.uk
Date of advice	9 th September 2025

I am writing with reference to your request for pre-application advice at the above site, received as valid on 14th May 2025.

I have now had the opportunity to review your proposal and can offer the following comments. Your proposal involves the sub- division of the ground floor into a one bed, one person flat and a two bed, three person flat, and the conversion of the first floor of the property into a one bed, two person flat. While I note the description of the development in your pre- application submission mentioned the one person flat as a studio, it is not a studio as it has individual rooms. I have accordingly altered the description.

Site Description

125 Wellington Street is a two storey mid terrace dwelling in a street of attractive dwellings of similar design and appearance. The site is within the urban boundary of Gravesend.

Relevant Planning History

Reference	Description	Decision	Decision date
20020178	Re-instatement and refurbishment of front boundary railings, gates, walls & piers.	Permitted	29 May 2002
20010680	Front porch	Refused	16 October 2001
19900401	Single storey rear extension	Permitted	17 June 1990

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy (2014)
- Saved policies in the Gravesham Local Plan First Review (1994)
- Kent Minerals and Waste Local Plan 2013 - 2030
- National Planning Policy Framework (2024)

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy (2014):

- CS01 – Sustainable Development

- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Style
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Design and Development Principle

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

- P3 – Vehicle Parking Standards
- H5 – Increasing the Housing Stock by Conversion of Existing Buildings

National Planning Policy Framework (2024):

- Section 2 – Achieving sustainable development
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed and beautiful places

Other Material Considerations

Supplementary Planning Guidance and other Documents

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance. <https://www.gravesham.gov.uk/local-plan-policy/supplementary-planning-guidance>

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

- SPG2 – Residential Layout Guidelines (2020)
- SPG4 – Kent County Council Parking Standards (2006).
- Householder Extensions/Alterations Design Guide (2021)
- Technical Housing Standards – nationally described space standard (2015)
- Design for Gravesham (2024).

Officer's Analysis

Principle Issues

The site lies within the settlement boundary of Gravesend where the main issues that would be considered with the submission of a planning application for the proposed development are as follows:

- Principle of Development
- Design, Character and Appearance
- Residential Amenity
- Impact upon Neighbouring Amenity
- Parking and Highway Safety
- Ecology and Biodiversity
- Other Material Considerations

Principle of development

The site comprises a two storey mid- terrace dwelling within the urban boundary of Gravesend. The proposal is to convert the property into three flats. Policy CS02 of the Gravesham Local Plan Core Strategy prioritises development in the urban area as a sustainable location for development, while Policy CS14 states the Council will protect the mix of housing in the existing housing stock and will resist the conversion of family- sized units to smaller properties. The supporting text to the policy states family accommodation is taken to be homes with two or more bedrooms. Given that the Council is unable to demonstrate that it has a five- year supply of housing land, Policy CS02 is out-of-date and only limited weight may be given to it in the determination of planning applications.

The existing property comprises six bedrooms with a fairly generously sized kitchen/ living and dining accommodation. The property is therefore family- sized. The proposed development would therefore result in the loss of such a unit and is accordingly contrary to Policy CS14 of the Local Plan Core Strategy which seeks to resist such development in order to retain family- sized housing in the borough.

Saved Policy H5 of the Gravesham Local Plan First Review states buildings that are proposed to be converted to flats, maisonettes, bedsits and Houses of Multiple Occupation shall be of a size and arrangement as to be generally unsuitable for single family occupation, shall have regard to the Council's Residential Layout Guidelines and shall achieve the adopted Vehicle Parking Standards wherever feasible.

The property is in an area where there are a number of examples of properties which have been granted permission for conversion from dwellings to flats, including at 124 Wellington Street and 89 Wellington Street. The dwelling at 125 Wellington Street is considered to be suitable as family- sized accommodation. However, given the presence of a number of permissions along the road for the conversion of dwellings to flats, it is not considered that an objection to the proposal at 125 Wellington Street could be upheld on this basis.

The supporting text to saved Policy H5 of the Local Plan First Review states the adaptation of larger houses will be targeted in those areas closest to the town centre which are unattractive to families and where environmental improvements can be achieved as part of the development package. The property is approximately 200m from the town centre.

Considering the size of the dwelling and its internal layout, the property lends itself to being converted to flats. While the conversion would be contrary to Policy CS14 of the Local Plan Core Strategy, the property does not benefit from off- street parking (which is more likely to be needed by a large family rather than by individuals/ couples/ small families who would occupy the flats). The Council is also unable to demonstrate that it has a five- year housing land supply. The current figure is 2.9 years. The delivery of housing in the Borough is substantially below (less than 75%) of that required by the Housing Delivery Test. The housing delivery element of Policy CS02 of the Gravesham Local Plan Core Strategy must therefore be regarded as being out of date, as required by the Paragraph 11(d) of the NPPF.

Considering the above points, and subject to the proposed development according with the other relevant material considerations, the principle of the property's conversion is considered to be acceptable.

Design, Character and Appearance

Section 12 of the NPPF relates to achieving well- designed places and sets out the Government's requirements in relation to design issues. Paragraph 131 of the document emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 of the document seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Local Plan Core Strategy reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area. Given that the proposed development would not result in any alterations to the external appearance of the building, it would not have any impact in this regard.

However, character is also appreciated from the type of development in an area. The conversion of

dwelling to flats does impact upon character. Given that there have been a number of conversions to flats along Wellington Street, it is not considered that the conversion of 125 to three flats would have an adverse impact upon the character of the area, in accordance with paragraphs 131 and 135 of the NPPF and Policy CS19 of the Local Plan Core Strategy.

Residential Amenity

The NPPF states planning decisions should aim to secure a high standard of amenity for all existing and future users. The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy and the Council's Design for Gravesham and Residential Layout Guidelines Supplementary Planning Documents. New development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts.

The proposed flats would exceed the minimum floorspaces for new properties, contained in the Technical Housing Standards – Nationally Described Space Standards document (2015), of 37/ 39 sqm for a one bed, one person flat; 61 sqm for a two bed, three person flat; and 50 sqm for a one bed, two person flat. It is however, considered that, while the two bed, three person flat and the one bed, two person flat would be of suitable sizes, the one bed flat would have too small and narrow a kitchen/ living/ dining room for it to be practical or useful for the reasonable layout of furniture. This would therefore not provide a suitable standard of accommodation for the future occupiers of the flat, contrary to the amenity guidance in the National Planning Policy Framework, Policy CS19 of the Gravesham Local Plan Core Strategy and the Residential Layout Guidelines and Design for Gravesham SPDs. It is moreover not clear from the submitted documents what amenity space provision would be made for the future occupiers of the flats, further detracting from the quality of accommodation.

Impact on Neighbouring Amenity

The NPPF, Policy CS19 of the Local Plan Core Strategy and the Council's SPDs require development to have an acceptable impact upon the amenities of the occupiers of the neighbouring and surrounding properties. While the proposed development would result in an increase in the intensity of the use of the site and more activity associated with it, it is not considered that this would be that materially greater than it would have an adverse impact upon neighbouring amenity. It is not considered that the use of three small flats rather than one large family dwelling would, with modern insulation, have a harmful impact upon the neighbouring occupiers.

Parking and Highways

The property is located in an edge of town location and therefore no parking provision is required. The provision of one cycle parking space per flat should be provided however, in accordance with the County Council's standards.

Ecology and Biodiversity

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive. This requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/ or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention as a Ramsar Site. Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings are likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6km of the SPA boundary and the Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Council has mitigated the impacts of this arising from applications for new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (of £337.49 per dwelling or flat). For every planning

application for a new dwelling (including new flats) which does not require any other contributions to be secured through a s106 legal agreement or unilateral undertaking, the tariff has been secured through a contribution agreement. The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However a more recent Court of Justice European Union (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between “the plan or project” itself and “measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

In this case, a contribution agreement would be sought for £337.49 for each of the additional units on the site. This would enable adequate measures to be put in place to mitigate the potential significant adverse effects on the Thames Estuary and Marshes SPA/ Ramsar Site, in accordance with paragraphs 187 of the NPPF and Policy CS12 of the Local Plan Core Strategy.

Other Material Considerations

Archaeology

The site lies within an area of multi-period archaeological potential. At application stage, the Council would consult Kent County Council Heritage advisors with regards to any such matters. However, as the proposed development would not appear to result in development affecting the ground, the proposal would appear not to have any implications for below ground archaeological deposits.

Summary

The Council is currently unable to demonstrate a five-year housing land supply and as the delivery of housing is substantially below (less than 75%) of that required by the Housing Delivery Test, the housing delivery element of Policy CS02 of the Gravesham Local Plan Core Strategy must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF.

The proposed development for a net increase of two flats would offer a minimal contribution towards meeting this local need and, accordingly, adds weight in support of the application. It is considered that the proposal would accord with local and national planning policy in this regard.

However, the quality of the accommodation that would be provided in the one bed flat would be substandard. While the flat would exceed the minimum floorspace standard, the width of the kitchen/ living/ dining room would be too narrow to allow for a reasonable room size and layout of furniture. The lack of amenity space provision would further damage the amenities of the future occupiers of the site and the flats. Should an application for the proposed development in the form indicated on the plans submitted with this pre- application enquiry, it would be unlikely to receive a favourable officer recommendation.

Next Steps

If planning permission is sought, an application can be made through the Planning Portal, here: <https://www.planningportal.co.uk/applications>.

Please be aware that should you wish to submit an application, it must be compliant with local and national validation requirements. You can find the requirements at: <https://www.gravesham.gov.uk/downloads/file/382/local-validation-list>

Prior to submitting a planning application, you may wish to engage the services of planning agent: <https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website: <https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application>

service.

You are advised that PRE20250113 is now closed.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.