



Delegated Report

Planning Application

Planning Application No: 20241062

Location: Manor Hotel Hever Court Road Gravesend Kent

Description: Alterations to existing hotel and fenestrations to create a business hub (office use) providing offices for rent.

Applicant: Mr M Rossi

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Planning Application Form;
Planning, Design & Access Statement;
Drawing No. D-01 Rev A – Site Location Plan & Block Plan As Existing;
Drawing No. D-02 Rev B – Parking As Existing;
Drawing No. D-04 Rev G – Parking As Proposed;
Drawing No. D-22 Rev D – Hotel Ground Floor Plan As Existing;
Drawing No. D-23 Rev A – Hotel First Floor Plan As Existing / Proposed;
Drawing No. D-24 Rev D – Hotel Ground Floor Proposed;
Drawing No. D-25 Rev C – Hotel Ground Floor Plan As Proposed;
Drawing No. D-26 Rev A – Hotel South Elevation Existing & Proposed; and
Drawing No. D-27 – Hotel East Elevation Existing & Proposed.

Relevant Planning History

Reference	Description	Decision	Decision Date
20240831	Alterations to the existing hotel to create a business hub (office use) providing offices for rent, and the development of the existing overspill car parking area situated to the east of the existing hotel to provide a B8 storage facility.	Refused	15.11.2024
20230757	Redevelopment of the site for a residential development comprising 12 new houses with associated access, private amenity space, vehicle parking provision, refuse and cycle storage	Refused and dismissed at appeal.	19.12.2023
20230756	External alterations and reduction in car parking from 100 spaces to 20 spaces.	Withdrawn	11.03.2024
20200105	Redevelopment of existing overspill car parking area situated to the east of existing hotel to provide a B8 storage facility	Permission	12.06.2020
20200104	Minor external alterations to existing hotel including reduction in car parking area.	Permission	12.06.2020
19880793	**AMENDED APPLICATION/REVISED DESCRIPTION**Erect. of part 2 & part 3 storey	Permission	08.05.1989

	building to provide 47 no guest rooms, 9no 1-bed apartments, 4no 2-bed apartments with anc. facilities; layout of assoc. car parking incorp. erection of s/s shelter; formation of vehicular access onto Hever Court Road.		
19870991	Details of the erection of a part single storey and part two storey hotel building to provide 28 no bedrooms staff accommodation conference rooms restaurant and ancillary facilities laying out of 2 no coach parking spaces and 77 no car parking spaces	Approval of Details	08.07.1988
19861029	Details of part single and part two storey hotel building to provide 28 no bedrooms with ensuite bathrooms staff accommodation functions room restaurant and ancillary facilities laying out of 2 coach parking spaces and 77 car parking spaces pursuant to co	Approval of Details	06.04.1987
19860158	Outline application for the erection of part single and part two storey hotel building to provide 28 bedrooms with ensuite bathroom staff accommodation functions room restaurant and ancillary facilities laying out of 2 coach parking spaces and 70 car parking spaces and formation of a vehicular access onto Hever Court Road.	Permission	08.09.1986

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS09 – Culture and Tourism
- CS10 – Physical and Social Infrastructure
- CS11 – Transport CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- TC7 – Other Archaeological Sites

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision-making

- Section 8 – Promoting healthy and safe communities
- 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);
- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

External

KCC Biodiversity

This is an internal layout change with some window changes and the previous plans for the car park removed, and as such we have no comments.

KCC Heritage

I have no comments to make on archaeological matters in this case as the proposed works would have no below-ground impacts in potentially sensitive areas of archaeological interest.

KCC Highways and Transportation

This application is similar to the previous application on this site (GR/20240831) with the self-storage element omitted. All the details relating to highway access and parking are repeated.

I therefore raise no objection to this application provided the following conditions are applied to any consent granted:

- Revised access arrangements, parking provision and general layout to be provided in line with drawing D-04 Rev G, prior to first occupation and permanently maintained. Parking provision to include 44 standard parking bays, one disabled bay, two oversized bays and three motorbike bays, all parking bays to be a minimum of 5.0m x 2.5m and aisle widths to be a minimum of 6.0m wide.
- A minimum of one active electric charging bay and 10 passive charging bays to be provided prior to occupation and permanently maintained. Active chargers must be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). Passive provision must include ducting and cabling.
- A minimum of 12 covered cycle spaces to be provided prior to occupation and permanently maintained.
- 2.4m x 43m visibility splays (or where this is not possible, splays that meet or exceed the existing visibility) at the site access, to be provided prior to occupation and permanently maintained, with no obstruction over 0.6m within the splays.
- Submission of a Construction Management Plan prior to commencement, to include the following:
 - (a) Routing of construction and delivery vehicles to / from site.
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel, which may require supporting vehicle tracking/swept paths.
 - (c) Timing of deliveries, avoiding network and school peaks where possible.

- (d) Provision of wheel washing facilities.
- (e) Measures to prevent the discharge of surface water onto the highway.
- (f) Temporary traffic management / signage.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Kent Police Designing Out Crime

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. CCTV is advised for entry/exit points and any other areas with limited natural surveillance or storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.
2. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
3. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
4. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution.
6. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
7. Parking - Where unavoidable, the car parking area must be covered by natural surveillance from an "active" window and sufficient lighting. In addition, we recommend CCTV to monitor the area and avoid misuse.
8. We advise on the use of ground/ wall SBD or sold secure anchors within a cycle storage area/ sheds of dwellings to deter bicycle theft. Bin storage must also be secure with access control.
9. Waste bins should be kept in a secure enclosure, ideally away from the building as bins can become a climbing aid or even an arson hazard.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should

incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Internal

GBC – Leisure

I am writing to confirm that I have no comments to make on the above application from a Leisure Services perspective.

GBC – Environmental Protection Team

It's noted that the storage facility part of the previous application has been removed. Comments as follows. There is no objection to this application.

Noise from any plant and equipment associated with the development must be suitably controlled.

Any external lighting or illuminated advertisement lighting must be compliant with the appropriate guidance to ensure that there is no adverse impact on neighbouring premises. The lighting should not illuminate anything other than the ground within the curtilage of the new development in order to ensure that the lighting does not cause a nuisance to neighbouring properties.

There is unlikely to be any impact on the nearby AQMA as a result of the development.

To address the above, the following conditions are recommended.

Noise Control

The rating noise from fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014

Lighting

Prior to the first use/occupation of the development hereby approved, details of all external illumination [and floodlighting] of the site including the luminance and spread of light and the design and specification of the light fittings shall be submitted to and approved in writing by the local planning authority. All illumination shall be designed in accordance with the Institute of Lighting Professionals "Guidance Note 01/21: Guidance notes for the reduction of obtrusive light" and "PLG05 The brightness of illuminated advertisements".

Neighbouring properties

Consultation was by way of the displaying of a site notice and individual letters sent to 18 surrounding properties with an overall expiry date of 6th January 2025. No comments have been made.

Officer's Analysis

Background

A previous application was submitted that included the current proposal of *Alterations to existing hotel and fenestrations to create a business hub (office use) providing offices for rent* (App. Ref. 20240831). However, this application included the creation of a B8 storage facility. It was deemed that the business hub would be acceptable, however the application overall was refused for the following reasons;

1. By virtue of the proposed commercial use, with large freight storage containers in an area that is predominantly residential, it would have a detrimental impact on the character and appearance of the area. The proposal would therefore be contrary to Policies CS19 and Sections 12 of the National Planning Policy Framework (2023).
2. The proposed use of the site is considered to be harmful to local amenity through unacceptable levels of noise and disturbance (From both the use and vehicles entering or leaving the site), and light pollution. The proposal is therefore contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014) and Section 12 of the National Planning Policy Framework (2023).

This current application has removed the B8 storage facility and the proposal is just for the business hub.

Proposal

This application is for the Alterations to existing hotel and fenestrations to create a business hub (office use) providing offices for rent.

The application site forms part of the existing ground floor conference room, bar and kitchen within the hotel and amendments to the car park located to the east of the hotel.

Existing Block Plan



Proposed Block Plan



Site History and Context

The site (0.10 hectare in area) consists of a large section of the hotel car park with access from Hever Court Road. The far eastern corner of the site is landscaped.

The site is located within the urban area of Gravesend with the A2 running parallel to the south of the site. With a wide frontage facing onto a large straight stretch of Hever Court Road, the site is highly visible from the surrounding area. Mature and substantial landscaping screens the residential development to the north from view.

View of Site Looking East



View of Site Looking West



The area is predominantly residential in character, with Best Western Manor Hotel, Premier Inn and The George Public House, a Grade II Listed Building located to the west.

Application Site



The key issues to be considered are as follows:

- Design, Character and appearance
- Neighbour Amenity
- Highways
- Archaeology
- Ecology and Biodiversity
- Heritage

Design, Character and Appearance

When considering the design of this proposal, it needs to be considered against the relevant local and national planning policy.

Policy CS19 (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The NPPF (2023) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

At a national level, the NPPF (2024) Section 12 states development should create high quality buildings and places which will function well and add to the overall quality of the area for the lifetime of the development.

The proposed business hub would be located within the existing hotel. It would utilise the existing ground floor conference room, bar and kitchen areas. Externally, only minor changes are proposed to the south elevation, with two sets of patio-doors serving the existing conference room being replaced with six windows which will serve the new offices (no.1-5 and 11). On the east elevation there would be two additional windows to serve the new offices (no.6 and no.7).

The proposed windows are of a size and design that reflect the existing and as such in design terms, the proposed business hub would be acceptable.

The development would accord with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Amenity (Neighbours)

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and paragraph 135 of the NPPF (2024) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The surrounding area is predominantly residential in nature.

The proposed business hub would operate out of the existing hotel and would use the existing parking facilities. It is therefore considered that whilst the intensity of use maybe increased, this would largely be during office hours and would not result in a detrimental impact above what is currently experienced from the hotel and conference use.

Therefore it is considered that the proposed business hub would not have a detrimental impact on neighbouring amenity, and would be in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Highways

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2024) states at paragraph 106, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2024) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe.

The existing access will remain and utilised for the proposals.

The proposed parking provision of 78 car parking spaces within the main car park and 22 within the overspill car park, (including 2no. disabled bays) and retention of the existing motorcycle spaces for the hotel and office, is considered to be acceptable.

KCC Highways and Transportation have raised no objections to the proposal, subject to a number of conditions including the provision of electric vehicle charging, cycle storage, visibility splay and Construction Management Plan.

Subject to conditions, it is considered that the proposed parking layout for the proposed development and retained parking for the hotel are inadequate and would be in accordance with Policies CS07 and CS11 (LPCS).

Archaeology

Policy CS20 (LPCS) gives 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. 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.

Saved Policy TC7 (LPFR) 1994 indicates that planning permission may be refused without adequate assessment of the archaeological implications in areas of archaeological potential.

At a national level paragraph 196 of the NPPF (2024) advises that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest (evidence of past human activity), local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

The site lies adjacent to the line of the Roman Watling Street with the potential for below ground archaeological remains associated with the road and adjacent activity of Romano-British and subsequent date.

The proposed development only includes alterations within the existing hotel and therefore if it is unlikely that the proposals would have a significant below-ground archaeological impact and would not recommend the need for any archaeological mitigation in this case.

The proposal therefore complies with Policy CS20 (LPCS), Saved Policy TC7 (LPFR) and Paragraph 201 of the NPPF (2024).

Ecology and Biodiversity

Paragraph 186 and 189 of the NPPF (2024) requires planning decisions to ensure that the natural and local environment is enhanced by minimising impacts on and providing net gains for biodiversity and this is reflected in Section 40 of the Natural England Commission Rural Communities (NERC) Act (2006) and the Environmental Act (2021).

Policy CS12 (LPCS) indicates that sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, and that there will be no net loss of biodiversity in the Borough.

The KCC Biodiversity Officer has stated that the proposal is just for alterations to the existing hotel and therefore there are no objections/

Conclusion and Recommendation

The proposed business hub would be acceptable and would not have a detrimental impact on the design, amenity and highways and parking, subject to conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	26th November 2024	Dated:	22nd January 2024