

PLANNING STATEMENT

Change of Use from Hotel (Use Class C1) Shared Residential Accommodation (Sui Generis HMO)

Bayswater House, Hever Court Road, Gravesend, Kent DA12 5UQ

Prepared in support of a planning application submitted to Gravesham Borough Council.

1. Introduction

This Planning Statement has been prepared in support of an application seeking planning permission for the change of use of Bayswater House from Hotel (Use Class C1) to Shared Residential Accommodation (Sui Generis HMO.) The application relates solely to the change of use of the existing building, with no external alterations proposed as part of this submission. The proposal represents the sustainable re-use of an existing building which is no longer viable for its former hotel use.

The application site comprises the former Premier Inn hotel located at Hever Court Road, Gravesend. The building is a two-storey structure previously operating as a budget hotel comprising approximately 31 guest bedrooms together with reception and ancillary facilities.

The site benefits from an extensive existing car park and established vehicular access.

The proposal seeks to bring the building back into productive use by converting the existing accommodation into shared accommodation, each containing independent bathroom facilities.

2. Site Description and Surroundings

Bayswater House is located on Hever Court Road to the south-west of Gravesend town centre.

The site is bordered by a mixture of land uses including:

- a public house
- hotel accommodation
- commercial premises
- residential dwellings

The building itself sits within a relatively generous plot and is surrounded by extensive hardstanding used historically for hotel parking.

Importantly, the nearest residential properties are located approximately 65 metres from the building, providing a significant degree of separation between the site and surrounding residential accommodation.

This separation distance substantially exceeds the commonly applied planning guideline of 21 metres between facing residential windows, ensuring that residential amenity impacts are inherently limited.

3. Description of the Proposal

The proposal seeks the change of use of the building from hotel accommodation (Use Class C1) to large-scale shared residential accommodation.

The development comprises the reuse of existing hotel rooms as individual residential rooms with private en-suite facilities.

The scheme introduces:

- communal kitchens
- shared lounge / amenity spaces on each floor
- communal laundry facilities

The accommodation is not self-contained and will operate as a single managed planning unit.

The proposed use is therefore best characterised as sui generis shared residential accommodation rather than Use Class C3 dwellinghouses.

4. Planning Policy Context

National Planning Policy Framework (NPPF)

The National Planning Policy Framework establishes a presumption in favour of sustainable development.

Relevant objectives include:

- making effective use of land
- supporting the delivery of housing
- prioritising the re-use of previously developed land.

Paragraph 125 of the NPPF encourages planning decisions that make efficient use of land, particularly through the reuse of existing buildings within sustainable locations.

The proposal accords with these objectives by delivering new housing through the reuse of an existing building without the need for additional land take.

Local Planning Policy

Gravesham Borough Council has identified a continuing need to increase housing supply across the borough.

The Council's Housing Development Strategy 2024–2028/29 identifies a requirement to deliver approximately 1,000 additional homes over the next five years and recognises a shortfall in deliverable housing land.

The strategy explicitly encourages:

- brownfield redevelopment
- reuse of underutilised buildings
- delivery of smaller residential units.

The proposed development directly contributes to these objectives.

5. Loss of Hotel Use

The site historically operated as a small budget hotel associated with the Premier Inn brand.

However, evidence demonstrates that continued operation as a hotel is no longer commercially viable.

Key factors include:

- limited scale of the hotel
- absence of supporting hotel facilities such as restaurants or meeting spaces
- significant local competition from larger and more centrally located hotels
- changing market conditions within the hotel sector.

Within a three-mile radius of the site there are several competing hotels providing a combined capacity of approximately 265 rooms.

Availability checks undertaken over a six-week period demonstrated that rooms were consistently available within these hotels, indicating sufficient hotel provision within the area.

The property has also been marketed for sale as a hotel over an extended period without a successful transaction, further confirming the lack of commercial viability.

The continued vacancy or under-use of the building would represent an inefficient use of land and built assets.

The proposed conversion provides a practical and sustainable solution.

6. Housing Need

Gravesham Borough continues to experience significant pressure in relation to housing supply.

The Council's housing strategy identifies:

- increasing demand for smaller housing units
- rising numbers of households in temporary accommodation
- a need to accelerate housing delivery.

The proposed development will contribute towards addressing this need by delivering a number of smaller units suitable for single households and young professionals.

The reuse of the existing building enables these homes to be delivered more quickly than new-build development.

7. Impact on Residential Amenity

The potential impact on neighbouring residential occupiers has been carefully assessed.

The nearest residential property lies approximately 65 metres from the building.

This distance substantially exceeds typical planning guidance and provides significant mitigation in relation to:

- privacy
- overlooking
- noise.

The orientation of the building and the presence of mature vegetation between the site and surrounding properties provide further screening.

In addition, proposed use is likely to result in lower levels of disturbance than the former hotel use, as hotel activity typically involves:

- late night arrivals
- early morning departures
- taxi movements
- deliveries.

The proposed use will therefore represent either a neutral or beneficial impact on residential amenity.

8. Parking and Transport

The site benefits from an extensive existing car park originally designed to accommodate hotel operations.

Hotel uses typically generate higher parking demand due to:

- short stay visitors
- staff parking
- delivery vehicles
- taxis.

Shared accommodation generally results in lower vehicle ownership levels.

The retention of the existing parking provision is therefore considered more than adequate to serve the proposed development.

Each residential unit will benefit from an allocated parking space within the existing car park.

9. Ecology

An ecological survey of the building was undertaken to assess potential impacts on protected species.

The survey identified no bat roosts within the building and recorded only low levels of foraging activity in the surrounding area.

The report concluded that the proposed development could proceed without the need for a bat mitigation licence.

Standard precautionary measures during construction will ensure compliance with wildlife legislation.

10. Management Arrangements

The building will be professionally managed to ensure the continued maintenance of the property and the responsible occupation of the units.

Key management measures include:

- tenancy agreements typically between six and twelve months
- allocation of dedicated parking spaces
- tenant vetting procedures
- on-site management oversight.

These arrangements will ensure that the building operates as a stable residential environment.

11. Planning Balance

The proposed development offers a number of clear planning benefits.

These include:

- the productive reuse of an underutilised building
- delivery of new housing within an existing urban area
- support for local housing supply objectives
- reduction in potential disturbance compared with hotel use
- minimal environmental impact due to reuse of an existing building.

It is also important to recognise that the building historically accommodated approximately 31 hotel bedrooms. Hotel uses typically involve a higher level of transient activity compared with residential occupation due to frequent guest turnover, late-night arrivals, early departures and associated service activity. The proposed development therefore represents a comparable or potentially less intensive form of occupation than the lawful hotel use.

12. Planning Policy Compliance

The proposed development has been assessed against the relevant provisions of the National Planning Policy Framework (NPPF) and the adopted development plan for Gravesham Borough.

The proposal is considered to comply with the overarching objectives of planning policy in the following respects.

National Planning Policy Framework

The NPPF promotes sustainable development and efficient use of land.

The proposal aligns with several key objectives including:

Delivering Housing Supply

The NPPF emphasises the importance of significantly boosting the supply of homes. The reuse of existing buildings to deliver housing is specifically encouraged where this can be achieved without adverse impacts.

The proposed conversion contributes to housing supply within the Borough by delivering a number of residential units within an existing urban location.

Effective Use of Previously Developed Land

Paragraphs within the NPPF encourage the reuse of previously developed land and existing buildings where this can support sustainable development. The proposal involves the **reuse of an existing building and site**, thereby avoiding the need for greenfield development and making efficient use of land.

Sustainable Development

The site is located within an established built-up area with access to:

- public transport
- local services
- employment opportunities.

The reuse of the building for residential purposes represents a sustainable form of development consistent with the core objectives of the NPPF.

Local Planning Policy

The development has also been assessed against relevant policies within the Gravesham Local Plan.

The proposal is considered consistent with these policies in the following respects.

Housing Delivery

Local planning policy recognises the need to increase housing supply across the Borough.

The proposed development contributes towards this objective by delivering additional residential accommodation within an existing urban location.

The provision of smaller residential units is particularly valuable in addressing the housing needs of:

- single person households
- young professionals
- key workers.

Efficient Use of Land

The proposal represents the efficient use of an existing building which is no longer viable for its previous commercial use.

Planning policy generally supports the reuse of redundant or underutilised buildings where this can provide wider planning benefits.

Residential Amenity

The development maintains substantial separation distances from neighbouring residential properties and therefore avoids harmful impacts relating to:

- privacy
- overlooking
- noise.

The proposal is therefore consistent with policies seeking to protect residential amenity.

13. Response to Potential Objections

A number of concerns are commonly raised in relation to proposals of this nature. These issues have been considered carefully and are addressed below.

Alleged Overdevelopment

The proposal does not involve any extension or enlargement of the building as part of this application.

The development relates solely to the **conversion of the existing building**, which historically accommodated approximately **31 hotel bedrooms**.

The proposal therefore does not intensify the physical scale of development on the site.

Impact on Residential Amenity

Concerns are sometimes raised that residential conversion could increase overlooking or disturbance.

However, the nearest residential property is located approximately 65 metres from the building, significantly exceeding the separation distances typically applied in residential planning guidance.

The presence of mature vegetation and the orientation of the building further reduce any potential for overlooking.

In addition, residential occupation typically generates less disturbance than hotel use, as hotels involve:

- frequent short-stay visitors
- late night arrivals
- early morning departures
- delivery activity.

The proposed development is therefore likely to reduce rather than increase disturbance.

Parking and Traffic

The site contains a substantial existing car park originally designed to serve hotel operations.

Hotel uses typically generate a higher turnover of vehicles due to the nature of short-stay accommodation.

Shared accommodation typically results in lower parking demand, particularly where occupants consist primarily of single households.

The existing parking provision is therefore considered more than adequate.

Character of the Area

The proposal does not involve any external alterations to the building and therefore retains the existing character and appearance of the site.

The development will have no adverse impact on the visual character of the surrounding area.

14. Overall Planning Balance

The planning balance clearly weighs in favour of the proposed development.

The proposal will:

- bring an underutilised building back into productive use
- deliver additional housing within the Borough
- make efficient use of previously developed land
- avoid greenfield development
- have minimal impact on neighbouring residential amenity
- reduce potential disturbance compared with the former hotel use.

No material planning harm has been identified.

The proposal therefore represents a sustainable form of development that is consistent with both national and local planning policy.

15. Conclusion

The development comprises the reuse of existing hotel rooms as individual residential rooms with private en-suite facilities.

The scheme introduces:

- communal kitchens
- shared lounge / amenity spaces on each floor
- communal laundry facilities

The accommodation is not self-contained and will operate as a single managed planning unit.

The proposed use is therefore best characterised as sui generis shared residential accommodation rather than Use Class C3 dwellinghouses.

The proposal will:

- deliver additional housing in a borough experiencing housing pressure
- bring an underutilised building back into active use
- have minimal impact on neighbouring residential amenity
- make efficient use of previously developed land.

The development therefore accords with both national and local planning policy and should be supported.

Accordingly, it is respectfully requested that planning permission be granted.