



Delegated Report

Planning Application

Planning Application No: 20260045

Location: 17 Wrotham Road, Gravesend, DA11 0PA

Description: Change of use from a dwellinghouse (C3) to a flexible dual use comprising a dwellinghouse (C3) and temporary contractor/employee accommodation for up to 10 people (sui-generis) in accordance with Class V of the Town and Country Planning (General Permitted Development) Order 2015.

Applicant: Mr Andrew Bellringer

Site Visit Date: 28 January 2026

Submitted Documents/Plans

Application form
Planning Statement
Drawing no. TI-RPSA001-001(site location plan)
Drawing no. TI-RPSA001-002revA (site plan)
Drawing no. TI-RPSA001-003 (existing floor plans)
Drawing no. TI-RPSA001-004 (proposed floor plans)
Drawing no. TI-RPSA001-005 (proposed cycle store)

Relevant Planning History

20141041	Change of use from offices (A2 Estate Agents) to a single family dwelling.	Permitted	15.01.2015
20110115	Conversion of premises from offices to a residential dwelling.	Application Refused	15.04.2011
19870778	Display of an internally illuminated fascia sign	Application Refused	26.10.1987
19850373	Erection of single storey extension at the side to form enlarged offices	Permitted	31.07.1985
19820807	Change of use of 1st and 2nd floors from residential to offices	Permitted	05.01.1983

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development

- CS11 - Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- T1 – Impact of Development on the Highway Network
- TC3 – Development Affecting Conservation Areas

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 5 – Delivering a sufficient supply of homes
- 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 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015);
- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006); and
- Upper Windmill Street Conservation Area Appraisal

Consultations, Publicity and Representations

Consultees

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. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
2. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.
3. Any pre-existing and new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
4. 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 ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) Guide 2025 states:
"19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features."
Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
5. If new external doorsets are proposed (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors, we recommend these 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.
6. If new windows are proposed on the ground floor and any window that is easily accessible on any other level e.g. from flat roofs or balconies, we recommend these 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.
7. Bedroom windows on the ground floor require a defensive treatment to deflect loitering.
8. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.
9. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
10. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents. For cycle storage, we advise on the use of ground/ wall SBD or sold secure anchors within a lockable shed or storage area.
11. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along with a freestanding post box of SBD/Sold Secure approved Gold standard. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the

ground floor to prevent access to all areas.

12. CCTV is advised for all communal entry points and to cover the mail delivery area.

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.

Neighbouring properties

The application has been advertised by letters to 15 individual neighbours, a site notice and a press notice. No letters of representation have been received.

Officer's Analysis

Proposal

This application seeks planning permission for the change of use from a dwellinghouse (C3) to a flexible dual use comprising a dwellinghouse (C3) and temporary contractor/employee accommodation for up to 10 people (sui-generis) in accordance with Class V of the Town and Country Planning (General Permitted Development) Order 2015.

Class V of Part 3 states:

Class V – changes of use permitted under a permission granted on an application

Permitted development

V. Development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted.

Development not permitted

V.1 Development is not permitted by Class V if—

- (a) the application for planning permission referred to was made before 5th December 1988;*
- (b) it would be carried out more than 10 years after the grant of planning permission;*
- (c) the development would consist of a change of use of a building to use as betting office or pay day loan shop; or*
- (d) it would result in the breach of any condition, limitation or specification contained in that planning permission in relation to the use in question.*

The proposal is for dual flexible use under Class V.

The first use would be continued residential use of the property as a C3 dwellinghouse, occupied by a single household, with exclusive occupation of the entire property for the duration of each stay.

The second use would be to operate as a form of serviced accommodation for employees/contractors for temporary medium/long term stays as opposed to short stay accommodation.

The property would not be operated as a House in Multiple Occupation (HMO) with individual room-by-room lettings, nor would it be subdivided for independent occupation. There would be no separate tenancies, no individual contracts, and no concurrent unrelated households occupying different parts of the dwelling. Instead, the property would function as a single home in use, albeit under professional management.

The Planning Statement confirms:

Intended Occupiers

The accommodation is intended to meet demand for medium- to longer-term residential accommodation for the following occupier groups:

- 1) contractor teams engaged on fixed-term or project-based work where temporary accommodation away from home is required.;
- 2) corporate organisations accommodating professionals on temporary relocation; and;
- 3) families requiring medium to long term accommodation associated with insurance-related displacement (for example following fire, flood or major repairs).

This type of occupation could either fall under Use Class C3 (dwellinghouse) or it could be for occupation by up to 10 contractors/employees as temporary accommodation (sui-generis).

In practice the C3 use is likely to be families requiring accommodation (C3(a) (no limit on numbers) although C3 includes other types of households under C3(b) or C3(c) of up to 6 people.

In terms of use, contractor/employee accommodation would be let to a single group (generally through a company or specialist agency) at any one time and rooms would not be let on an individual basis. The property would be managed as a single dwelling in use, with one booking per stay. As the occupants will be using the property on a temporary basis they are likely to have a main place of residence elsewhere.

All of these would involve a single household or group occupying the property as a whole. In these cases, the occupation would be temporary but residential in nature, with the occupiers using the property as their place of residence for the duration of their stay.

For larger groups greater than 6 occupation would be based on some of the bedrooms being occupied by 2 people at a time.

The property would also be available for standard use as a C3 dwellinghouse for a family/single household on a long term/permanent basis.

Length of Stay and Turnover

Occupancies would generally be medium- to longer-term, with stays typically 30 days or more, which would be booked by companies for use by groups of contractors, cooperate companies for professionals and temporary accommodation for families which are linked to insurance companies.

This pattern of use would result in lower turnover and fewer comings and goings than short-stay or visitor accommodation, thereby limiting any potential impact on neighbouring residential amenity.

The property is not intended to operate as short-term visitor accommodation, and would not involve frequent changeovers, reception-style management, or services associated with hotel or visitor uses.

Servicing

The property would be serviced with maintenance, cleaning and bed linen laundry services provided for the residents during their period of stay.

Occupancy Levels

A maximum occupancy of up to 10 occupants is proposed. This figure reflects the size of the dwelling, the number and dimensions of the bedrooms, and the existing level of amenity provision within the property.

The proposed occupancy represents a modest increase over the current lawful use and would not result in an over-intensive form of occupation, nor would it materially alter the residential character of the property or its surroundings.

No external changes are proposed to the building other than bike storage.

The main planning considerations are as follows:

- The principle of the proposed change of use
- The impact on the character and appearance of the area and surrounding Conservation Area
- Impact on Amenity
- Ecology
- Parking and Highway Safety

Principle of Development

Local authorities may grant a flexible planning permission, whereby alternatives uses are specified. A flexible or “dual-use” permission is granted under permitted development Class V of Part 3 of Schedule 2 of the GPDO, which allows an application to be made for planning permission for two separate uses that can then be used flexibly and interchanged over a ten year period.

In order to qualify as a flexible planning permission, the decision notice should explicitly state that the uses are flexible in the description of development. An application for a flexible planning permission should make clear that the uses applied for are intended to be used flexibly.

In this case the application seeks permission for the change of use from a dwellinghouse (C3) to a flexible dual use comprising a dwellinghouse (C3) and temporary contractor/employee accommodation for up to 10 people (sui-generis).

Schedule 2, Part III, Class V of The Town and Country Planning (General Permitted Development) (England) Order 2015 refers to development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted. If the planning application is granted, it will then be possible for the use of the building to change between the relevant use classes without needing to make any further planning applications.

Under Class V the flexibility to change between the different uses applies for 10 years from the date of the grant of the planning consent. That means that, in practice, after the 10-year date, the authorised use of the building or land is whatever the actual use was on the relevant date. If further flexibility is still required after the 10-year date, an applicant would be able to make another application under Class V, if the class still exists at that time.

In this case the current lawful use is C3 Dwellinghouse as permitted by 20141041 and therefore this use is acceptable. The main matter to consider is therefore whether the use of the property as sui generis use for temporary contractor/employee accommodation for up to 10 people would be acceptable.

Policy H5 of the Gravesham Local Plan 1994 states:

In considering proposals for the conversion of existing properties to provide flats, maisonettes, bedsitters, hostels, homes and other forms of multiple occupancy, the Borough Council will have regard to the

following criteria:-

- (i) The building shall be in an appropriate area for conversion to flats, maisonettes, bedsitters and multiple occupancy. Unless there are special or overriding circumstances, conversions will not normally be permitted in an area comprised for the most part of single family dwellings. Conversely, conversions will not normally be permitted in areas which are environmentally unsuitable for young families and which already demonstrate a predominance of multiple occupation.*
- (ii) The building shall be of such a size and arrangement as to be generally unsuitable for single family occupation.*
- (iii) The proposal shall have regard to the Borough Council's Residential Layout Guidelines, as set out in supplementary planning guidance.*
- (iv) The adopted Vehicle Parking Standards must be achieved wherever feasible.*

The site is located within the town centre opportunity area (policy CS03), an area where change of use to offices is acceptable (policy E5) and the Upper Windmill Street Conservation Area (policy CS20).

The site is located within a residential area which is opposite a more commercial area and faces the town centre one-way system. Many properties within the vicinity of the application site have been converted to flats. The proposal to allow a flexible use to include temporary accommodation for contractors therefore meets the criteria of Policy H5(i). The building is of a size and arrangement which is suitable for single family occupation and therefore the proposal does not strictly meet criterion (ii) however the policy does not state whether one or all of the criteria need to be met but just that the Council will have regard to them. On balance, the property has in the past been lawfully used for offices and therefore had once been lost as a dwelling and therefore it is not felt strongly that the building is only suitable as a single family dwelling. The layout accords with the Borough Council's Residential Layout Guidelines and therefore meets point (iii) and is located in a sustainable location where there is access to public transport and public car parks and therefore does not require on site parking in line with the adopted Vehicle Parking Standards and meets point (iv).

Policy CS14 of the Gravesham Core Strategy 2014 states:

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.

Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.

The proposed flexible use will provide either a dwellinghouse or temporary accommodation for contractors. Both of these uses contribute to the mix of housing in the area and accord with this policy.

Policy CS15 of the Gravesham Core Strategy 2014 states:

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. Variations in density across a site should be used to develop different character areas.

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 situated. 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;

• In the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.

Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.

The housing density will remain the same and therefore this policy is met.

Design, Character and Appearance

The proposal to use the property as a C3 dwellinghouse or sui generis use for the temporary accommodation of contractors involves no external alterations to the property and therefore there will be no detrimental impact on the character and appearance of the street scene or the surrounding Upper Windmill Street Conservation Area. Details of the size, design and location of the proposed cycle store have been provided showing a modest store located in the rear garden which will not be visible from outside the site. No objection is raised to this in terms of design.

The proposed development therefore accords with policies CS19 and CS20 of the Gravesham Core Strategy 2014, Policy TC3 of the Gravesham Local Plan 1994 and paragraph 135 and section 16 of the National Planning Policy Framework 2024.

Amenity

Future Occupiers

All the rooms meet the size requirements of the local and national adopted space standards. The smallest room is room 4 at approx. 10sqm. This meets the national size requirements for a single bedroom. The proposal for the sui generis use states that there would be up to 10 people in the property living together. The property has 5no. double bedrooms and this single room which is acceptable. The submitted information states that some of the rooms will be occupied by two people but these people would be contractors working for the same company. When the use is C3 it would be used to house a family and there would be no limit on the number of people. In terms of levels of amenity it is important that, when in sui generis use, the number of residents is limited to 10 and therefore a condition is recommended for this element.

In terms of outlook, sunlight, daylight and privacy all habitable rooms are sufficient whether in C3 use or sui generis use.

In terms of noise, both situations involve people who know each other living together and no noise issues are anticipated over and above any other residential use.

Neighbouring Amenity

The application site is a detached property. No external alterations are proposed save for the construction of a cycle store in the rear garden and therefore there will be no loss of outlook, privacy, sunlight or daylight to any neighbouring property. In terms of the proposed C3 use no concerns are raised with regards to noise as this is an existing use. In terms of the sui generis use there could be up to 10 people living together. These people are likely to be contractors who will be working for the same company and therefore their daily routines are likely to align with one another. The proposed levels of activity and noise from the sui generis use are not considered to be greater than a C3 use. Nevertheless, protections are in place through separate legislation, specifically the Environmental Protection Act 1990, to ensure cases of excessive noise and disturbance which constitute a statutory nuisance are redressed.

The proposed development provides an appropriate level of amenity space for new and future Occupiers for both proposed uses and therefore accords with policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135f of the National Planning Policy Framework 2024.

Ecology and Biodiversity

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

As the proposed development does not impact a priority habitat and impacts less than 25sqm of on-site habitat and 5m of on-site linear habitats such as hedgerows the project is exempt from BNG.

Parking and Highways

The application site is located within the town centre which contains shops and amenities, public transport and public car parks. The site is highly sustainable and therefore the proposal to provide no off-road parking meets the standards which are set as a maximum.

A cycle store is proposed in the rear garden. A condition is recommended that this be provided prior to the use being implemented.

Subject to this condition no objection is therefore raised on highways grounds.

Conclusion

The proposal to change from a dwellinghouse (C3) to a flexible dual use comprising a dwellinghouse (C3) and temporary contractor/employee accommodation for up to 10 people (sui-generis) in accordance with Class V of the Town and Country Planning (General Permitted Development) Order 2015 will have no detrimental impact to the character and appearance of the area, conservation area, amenities, parking or highway safety and is therefore recommended for approval subject to conditions.

Recommendation:

Permit

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	1 April 2026	Dated:	7th April 2026

