



Planning, Design and Access and Heritage Statement

7 Wrotham Road, Gravesend, DA11 0PD

“Amendments to former office building with Prior Approval to convert to residential use (Ref: 20231143) including; roof level extension to create 1x 1b2p and 1x 2b 3p additional units (Use Class C3); first floor rear extension (to amend a 1b 2p unit to a 2b 3p unit); altered external staircase access and internal rearrangement (to amend a 1b 1p flat to a 1b 2p flat); new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation”

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For and on behalf of Forma Property Ltd

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CONTENTS

1.0 Introduction and Summary

2.0 The Site

3.0 Proposal

4.0 Planning Policy Summary

5.0 Planning Assessment

7.0 Conclusion



1.0 Introduction and Summary

1.0 The proposal seeks planning permission for amendments to a vacant former office building at 7 Wrotham Road, to introduce new residential floorspace and two new units, in addition to that allowed under the Prior Approval process (ref: 20231143) on 4th January 2024. The proposal will result in an uplift in the overall number of units from 11 to 13 (two additional units) and will improve the living space at Flats 1, 2 and 10, as indicated on the accompanying plans.

1.1 The application drawings indicate all proposed new development in red, with already approved and unchanged layouts in blue for the sake of clarity.

1.2 The application is described as follows:

“Amendments to former office building with Prior Approval to convert to residential use (Ref: 20231143) including; roof level extension to create 1x 1b2p and 1x 2b 3p additional units (Use Class C3); first floor rear extension (to amend a 1b 2p unit to a 2b 3p unit); altered external staircase access and internal rearrangement (to amend a 1b 1p flat to a 1b 2p flat); new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation”

1.3 The proposals will extend the existing building to provide an uplift in residential floorspace from 752.79sqm to 862.41sqm. This will allow for the two new units at roof level (Flats 12 and 13) and an enlarged Flat 10 at first floor level.

1.4 The amendments will improve the development proposal agreed under the Prior Approval application and lead to better quality living accommodation, as well as boosting local housing supply in a sustainable location re-using an existing building.

1.5 This application consists of the following:

- Site Location and Block Plans
- Existing and Proposed Planning Drawings



- Planning, Design and Access and Heritage Statement (this document)
- Daylight Sunlight Assessment
- Highways Statement
- Noise Assessment
- Flood Risk Assessment
- Air Quality Assessment
- Application Forms and CIL Form 1



2.0 The Site

- 2.1 The proposal site comprises 7 Wrotham Road, a vacant office block that has recently had prior approval agreed for a change of use to eleven self-contained units.
- 2.2 The property was originally built as a residential building prior to being converted to offices and extended at roof level and to the rear. The 1960s rear extension infilled a large area of garden space with a two-storey office building fronting Cobham Street, with a small area of car parking to the rear.
- 2.3 The existing building has lower and upper ground floors, with two storeys above, one of which is within the extended roofspace. The rear extension is two storeys from ground level and has an additional storage room at third storey level. There is a car park to the rear of the extension that is accessed via an undercroft.
- 2.4 The site area is 564.35sqm (0.054ha) and the footprint of the building is 317.28sqm. The remaining space is occupied by car parking and the hard landscaped front garden space in front of the original house.
- 2.5 Wrotham Road is an arterial route from the A2 to the centre of Gravesend. It has a varied character and at the north end, around the site, is mixed and predominantly residential. Cobham Street is entirely residential and made up of two, three and four storey terraces, with one three-storey detached home directly opposite the site. The majority of homes here have been subdivided into flats or HMOs.
- 2.6 The front part of the site is within the Upper Windmill Conservation Area and the rear part of the site is within the Darnley Road Conservation Area.
- 2.7 As described in the Upper Windmill Conservation Area Appraisal, the principle feature of the built form in the area is its urban character, with residential buildings dating from the last quarter of the 19th Century. Typically buildings in the area are two and three storeys and set back from the pavement behind front areas, with dwarf walls and cast iron railings. Buildings are constructed of yellow brick with detailing of stucco and polychrome brickwork. The front part of the application site is typical of the



Conservation Area in these regards, whilst the rear part of the site is seen as a negative feature.

- 2.8 The site is well located for shops and services being just 200m from Gravesend Town Centre. It is also just 100m from Gravesend Central Rail Station, with regular services into London and surrounding town centres in Kent.

Planning History

- 2.9 The following planning history for the site is available on the planning register:

- 20231143 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use from office to 11 Flats, internal reconfiguration and all associated works – **Approved 4th January 2024**
- 19880706 - Erection of single storey extension on the north elevation to form a document store – **Approved September 1988**
- 19910077 - Erection of two storey rear extension at first and second floor levels to form boardroom at first floor level with document store over – **Approved July 1991**

- 2.10 The applications above are material to the consideration of this proposal as they establishes the change of use of the building to residential and identified internal layouts that can be achieved under permitted development, as well as establishing the principle for increased height to the rear office building.

- 2.11 The most recent application proposal (Ref: 20231143) was assessed under the prior approval process, with the key findings as follows:



- Highways – Maximum parking standards operate in town centre locations and the provision of 5 spaces would be a significant improvement compared to the previous use as an office and arguably an overprovision. The car parking should therefore be allocated to a particular flat. The level of cycle parking meets standards but a condition was attached to seek to move it to the rear car park.
- Land Contamination – There are no indications of contamination at the site based on past history of use. A watching brief is proposed during construction and secured by condition.
- Impact on the sustainability of the Conservation Area – There are no external works proposed but the cycle store at the front of the property was considered dominant and it was requested to relocate it to the rear car park.
- Noise – The proximity of the road was noted but there were no identified commercial noise sources nearby that required assessment.
- Flood Risk – The site is in Flood Zone 1 and at low risk of flooding.
- Impact on Industry – the site is within the town centre and not near to any industry that might be affected.

2.12 The proposal met all other screening requirements and was approved on the 4th January 2024.



3.0 Proposal

3.1 The proposal seeks to improve on the recently approved proposal to change the use of a vacant office premises to residential (11 flats), via a series of minor amendments and small extensions to the building.

3.2 The change of use of the building has already been established. The proposed changes are summarised as follows:

- Two additional C3 units (1x 1b2p and 1x 2b3p) within a roof extension;
- Enlargement of Flat 10 by 34.8sqm via a second storey rear extension (1b2p unit to a 2b3p unit)
- New window and separate bedroom to Flat 1 (1b1p to a 1b2p unit)
- Relocation of communal access from front entrance to side entrance
- Direct external staircase access to Flat 2 and internal rearrangement to create a separate bedroom
- New window insertions on the rear elevation serving flats 4 and 9.

3.3 These changes are summarised in the proposed development description as follows:

“Amendments to former office building with Prior Approval to convert to residential use (Ref: 20231143) including; roof level extension to create 1x 1b2p and 1x 2b 3p additional units (Use Class C3); first floor rear extension (to amend a 1b 2p unit to a 2b 3p unit); altered external staircase access and internal rearrangement (to amend a 1b 1p flat to a 1b 2p flat); new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation”

3.4 The principle the development has already been established via the recent prior approval application. The proposals will add two new units to the local housing stock in a sustainable town centre location and will ensure a better standard of accommodation for future occupants.



4.0 Planning Policy Summary

4.1 Planning law sets out that planning applications are determined in accordance with the Council's Development Plan unless material considerations indicate otherwise. The Development Plan for Gravesham consists of:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) – saved Policies
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)

4.2 In accordance with the Local Plan Policies Map, the proposal site is within an Opportunity Area (CS03-CS06) and at the edge of the defined Town Centre (CS08). The front part of the site is within the Upper Windmill Conservation Area and the rear part of the site is within the Darnley Road Conservation Area (CS20). Each has a Conservation Area Appraisal associated.

Core Strategy

4.3 The following policies of the Core Strategy are considered most relevant:

- Policy CS01: Sustainable Development
- Policy CS02: Scale and Distribution of Development
- Policy CS05: Gravesend Town Centre Opportunity Area
- Policy CS11: Transport
- Policy CS14: Housing Type and Size
- Policy CS18: Climate Change
- Policy CS19: Development and Design Principles
- Policy CS20: Heritage and the Historic Environment

4.4 The Council undertook a review of the Plan in September 2019 finding that there was a need for a partial review in terms of Policy CS02, due to the increased need for housing.



Local Plan (Saved Policies)

4.5 The following saved policies of the Local Plan are of most relevance:

- P3 – Vehicle Parking Standards
- P5 – Exceptions to Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas
- T1 – Impact on the Highway Network

Supplementary Planning Guidance

4.6 The following documents provide additional guidance to support adopted policy.

- SPG2 - Residential Layout Guidelines (2020)
- SPG 4 - KCC Parking Standards (2006)
- Darnley Road Conservation Area Appraisal
- Upper Windmill Conservation Area Appraisal

Other Material Planning Considerations

4.7 Other material considerations include:

- National Planning Policy Framework
- National Design Guide
- Nationally Described Space Standards

4.8 Gravesham are not current able to demonstrate a 5-year housing land supply, with a 2.9 year supply most recently calculated. As this is substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF.

4.9 The presumption in favour of sustainable development therefore applies, with planning permission granted unless:

- i. “the application of policies in this Framework that protect areas or assets of*



particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 4.10 In determining applications for planning permission involving housing, the Council must therefore apply a weighted balance in favour of granting planning permission.



4.0 Planning Assessment

4.1 The principle of residential development at this site has already been established via the recent prior approval application. The key planning considerations in relation to this proposal are as follows:

- Housing Need
- Design, appearance and impact on the Conservation Area
- Amenity of Future Occupiers
- Neighbouring Amenity
- Environmental Protection
- Highways Impact

Housing Need

4.2 With regard to housing need, Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence shows that the Council is not able to demonstrate a five-year housing supply, with the latest figures showing just 2.9 years.

4.3 In decision making, if an authority cannot demonstrate a five-year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply when considering planning applications, as set out in paragraph 11(d) of the NPPF. As Gravesham is unable to demonstrate a five-year housing land supply, the council is required to undertake a balancing exercise when considering planning applications, to ensure that the correct weight is attached to the shortfall in meeting the five-year housing land supply requirement and the provisions within the NPPF.

4.4 The proposal provides a modest uplift of two units but will support a scheme that will deliver a total of 13 units in a highly sustainable location, walking distance from

Gravesend Rail Station and the town centre. Given the substantial shortfall in housing supply substantial weight can be given to any development that delivers housing in the area, particularly in a location such as this. The principle of converting the office space has already been established and the current proposal seeks to make more efficient use of the available land, in accordance with paragraph 128 of the NPPF.

Design, appearance and impact on the Conservation Area (Heritage Assessment)

- 4.5 The main change to the building relates to the replacement of the existing office storage area at roof level with a set-back third storey consisting of two self-contained residential units. As illustrated below, the additional storey will be set back from the building edge to ensure that it is a recessive feature in the streetscape and that it does not disrupt the transition in the building line to 55-58 Cobham Road, which are set back from the street edge to allow for front garden areas.



Figure 2 – Set back top storey

- 4.6 Whilst visible from the street, the set back will significantly reduce the impact as the angle of view from street level will ensure it is always partially obscured. The tiled pitched roof is consistent with the area and will assist in assimilating the addition to the area. The existing building is already a clear anomaly in the streetscape, so the design approach simply seeks to be neutral and complimentary to the surroundings.

- 4.7 The other amendments to the building are minor in nature and mainly confined to the rear. The extension to the rear will be above an existing extension and will only be visible in glimpsed views from Rathmore Road. The design will simply replicate the existing building. Likewise, window insertions are largely confined to the rear where they would not be visible. The only changes visible from the street would be a basement window at Cobham Road (which is replicated on the opposite side of the road) and an amended stair access, shown indicatively at Figure 3. This stair access will go to the upper ground floor rather than directly to the lower ground floor.



Figure 3 – Indicative amendments to frontage

- 4.8 Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. The site is located partly within the Upper Windmill (front), partly within the Darnall Road (rear) Conservation Area, and partly outside of both (See Fig 4).
- 4.9 The site is within Upper Windmill Character Area 4: Wrotham Road. No 7 Wrotham Road is described in the appraisal as being of two storeys over a raised basement, with centrally placed canted bay at basement and ground floor levels. The building is constructed from yellow brick, with distinctive raised red and blue brick detailing of

architectural features, such as quoins and a cornice. Unfortunately, it notes, this building has been the subject of a large box roof extension, which has undermined the well-considered proportions of the historic building.

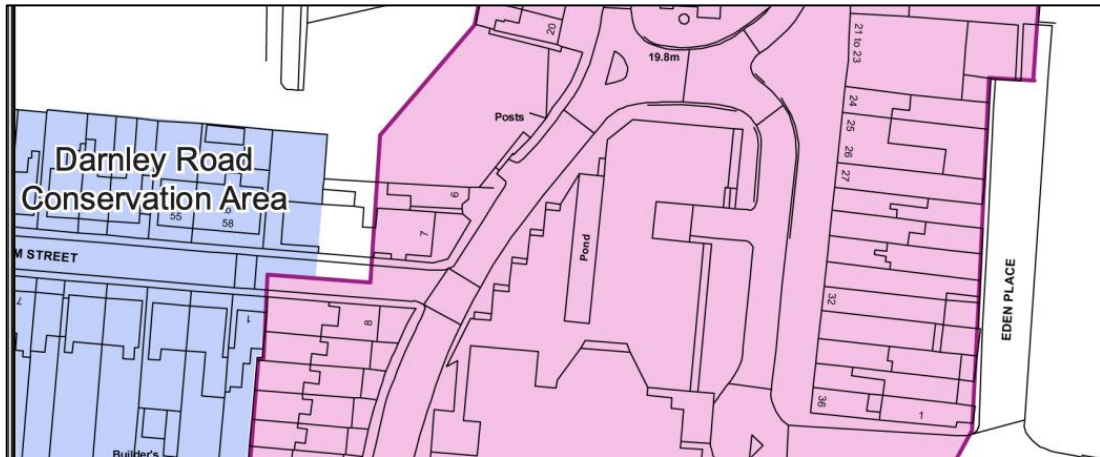


Figure 4 – Upper Windmill CA in Pink and Darnley Road CA in Blue

- 4.10 The principal features of the built form in the area are its urban character with residential buildings dating from the last quarter of the 19th Century. Typically buildings in the area are two and three storeys and set back from the pavement behind front areas, with dwarf walls and cast iron railings. Buildings are constructed of yellow brick with detailing of stucco and polychrome brickwork.
- 4.11 Negative features of the area are the volume, speed and associated noise of traffic; slate roofs replaced with concrete tiles; and demolition of boundary walls to create off road vehicle parking areas. The Darnley Road Conservation Area Appraisal specifically notes the negative features of Character Area 2: Cobham Street and Darnley Street, as the appearance of the rear extension to no.7 Wrotham Road. It is therefore clear that the front of the building is worthy of more attention than the rear.
- 4.12 Policy TC3 requires that development in Conservation Areas will be judged on their impact and will be expected to make a positive contribution. The very act of bringing 7 Wrotham Road back into its originally intended residential use will have a positive impact on the Conservation Area, whilst the investment in the property as a whole will also benefit the area. The changes are so minor as to have a negligible impact and



to certainly cause no objective harm. Although barely visible, the existing third storey storage extension is incongruous and the proposed extension will be more suited to the host building and to the area. As such it is considered that the Council's responsibilities under S72(1) can be discharged.

Amenity of Future Occupiers

4.13 One of the primary purposes of the application is to improve the internal accommodation from that agreed under Prior Approval. The internal rearrangements can largely be achieved without planning permission, but the new window insertions, amended access and extensions to the building require consideration, as do the two new units.

4.14 Firstly, all units have been designed to meet and exceed national minimum space standards as follows:

Unit Number	Type	GIA	Minimum	Difference
Flat 1	1b 2p	76.1sqm	50sqm	+26.1sqm
Flat 2	1b 1p	38.1sqm	37sqm	+1sqm
Flat 3*	1b 1p	40.43sqm	37sqm	+3.43sqm
Flat 4*	2b 3p	61.05sqm	60sqm	+1.05sqm
Flat 5*	1b 2p	63.22sqm	50sqm	+13.22sqm
Flat 6*	2b 4p	72.52sqm	70sqm	+2.52sqm
Flat 7*	1b 1p	38.35sqm	37sqm	+1.35sqm
Flat 8*	1b 1p	39.18sqm	37sqm	+2.18sqm
Flat 9*	1b 1p	40.32sqm	37sqm	+3.32sqm
Flat 10	2b 3p	68.95sqm	60sqm	+8.95sqm
Flat 11*	2b 3p	68.9sqm	60sqm	+8.9sqm
Flat 12	2b 3p	62.32sqm	60sqm	+2.32sqm
Flat 13	1b 2p	50.26sqm	50sqm	+0.26sqm

Table 1 – Space Standards (*Flats approved under application 20231143 and unchanged)

4.15 As the proposal is predominantly a conversion there is no opportunity to provide external outdoor amenity space either individually or communally. However, there are



a number of open spaces and outdoor recreational spaces within walking distance of the site, including the Riverside Leisure Area and Gravesend Promenade, Gravesend Cricket Club, Dashwood Open Space and Woodlands Park. There is also an indoor communal space for residents which can be used flexibly for homeworking or leisure.

- 4.16 New windows have been inserted to flats 1, 4, 8 and 10 and an internal daylight test has been undertaken to demonstrate compliance with BRE guidelines.

Neighbouring Amenity

- 4.17 The proposal will add two units to that already approved under application 20231143. In terms of noise and activity, the impact of the additional units would be negligible. None of the proposed new windows face neighbouring windows and there is over 10m separation between the west facing windows on the new extension and the amenity area to the rear of the neighbouring houses.
- 4.18 The proposed additional storey is set well back from the building edge to avoid impinging on the outlook of neighbouring properties and ensuring no material impact on daylight, sunlight and overshadowing. Accordingly, neighbouring amenity will be protected.

Environmental Protection

- 4.19 The proposal is located within 6km of The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA). Developers are expected to pay a fee of £314.05 per additional C3 unit of accommodation. The proposal would provide an uplift of two new units and as such a contribution of £628.10 is due. This will be discussed with the case officer and provided prior to determination.

Highways, Parking and Servicing

- 4.20 Policy CS11 states that parking should be provided in line with adopted standards. In this instance it would mean the Kent Vehicle Parking Standards (2006) SPG; The Kent Design Guide Review: Interim Guidance Note 3: residential parking (2008) and the Kent



design guide: movement & connectivity: parking standards (2022). As described in the accompanying transport statement, these documents set out that residential car parking should be provided at a maximum of one off-street space per unit based on the proposed unit mix and edge-of-centre location. However, reduced levels of provision are supported where effective mitigation measures are in place including Controlled Parking Zones and the availability of sustainable transport modes.

- 4.21 Saved Policy P3 adds that parking standards can be reduced if justified as an exception. Such exceptions would include development in central Gravesend. Saved Policy P5 also states that where the provision of parking would lead to a building being unused or underused the Council will consider a relaxation of standards, providing it does not exacerbate on-street parking problems in the area.
- 4.22 Due to the highly accessible location, with good access to public transport and local facilities location, residential units within the Pelham Ward typically have far lower levels of car ownership when compared to the overall figures for Gravesham. Furthermore, there is a CPZ in operation in the area, ensuring that parking can be controlled. On this basis, there is considered to be an exception to the general rule of meeting parking standards.
- 4.23 Saved Policy T1 states that the Local Planning and Highways Authority will consider the impact on the transport system and the environment of traffic generated by the new development. The increase in the number of units would have a negligible impact on the local area, with traffic movements and parking requirements remaining below the equivalent office use, even accounting for the extended floorspace.
- 4.24 The recent application to convert the office building to residential use under Prior Approval noted that no parking was required for development in this town centre location. On this basis it was found that there was in fact an overprovision of parking, with 5 off-street spaces serving 11 flats. Nevertheless, this was considered acceptable provided the space were allocated and that the correct level of cycle parking was delivered, with the proposed cycle parking requested to be moved from the front of the building to the rear car park. The effect of this is to lose one of the 5 parking



spaces. The development will now provide 4 allocated off-street parking spaces and 16 secure cycle parking spaces for 13 units. This is considered to be appropriate to the location and compliant with adopted policy.

- 4.25 In terms of servicing, a domestic residential bin and recycling storage area will be located to the rear of the site. Bins will be moved to the junction with Cobham Street on collection days.



5.0 Conclusion

- 5.1 The proposed conversion of the office building to a residential use has already been established via a recent Prior Approval application. The proposed amendments and extension to the building will make efficient use of land in a sustainable town centre location and will improve the conditions for future occupants. There would be no harm to neighbouring amenity or adverse impact on local highways. The proposed changes are minor in nature and neutral in their design, resulting in no identifiable harm to the setting of the Conservation Areas the site falls within.
- 5.2 The proposal for an additional two units to add to the eleven recently granted, will provide a small but important contribution to help meet and identified shortfall in housing supply. Crucially, it can also be delivered quickly. The required SAMM contribution is agreed and will be paid prior to the development commencing.
- 5.3 The proposals accord with adopted Core Strategy and UDP Policies and the relevant paragraphs within the National Planning Policy Framework. The Council has an identified under supply of housing and as such the “Presumption in Favour of Sustainable Development” and the “Tilted Balance” apply. There are no clear reasons for refusal and any adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits of delivering high quality housing in this location.
- 5.4 As such the proposals are considered acceptable and it is respectfully requested that the application is recommended for approval.