

PLANNING STATEMENT

for

**A three storey terraced house consisting
of 3 one bedroom apartments on each
floor and stairwell**

at

**Land adjacent to 35 Clarence Place,
Gravesend, Kent. DA12 1LB**



March 2026

Site and Situation

The application site forms part of the landscaped grounds that surround the Gravesend Veteran's Club to the south of Clarence Place and is located within the Woodmill Hill Conservation Area. The application site, however, is owned by the applicant.

The planning application site is a mown grassed area with one flowering cherry tree and 5 sycamores forming a group along the frontage.

The Windmill Hill Conservation Area Appraisal 2009 (CAA) identifies the character of the CA as a residential suburb, containing a large number of buildings of architectural and historic interest with open spaces that form a green and open character with mature individual trees and tree groups present.

The built form along Clarence Place is comprised of paired villas and stucco residential terraces. Development along the northern side of the street is more continuous whereas along the southern side it is more varied, with more open green spaces and mature trees visible in the street scene. The significant majority of buildings are set back from the pavement, behind front gardens. Front boundary treatments generally consist of brick walls, railings and a combination of both, but in most cases the front gardens remain visible adding to the spaciousness of the street scene.

The site is in a highly sustainable location being within a kilometre of Gravesend Town Centre which lies to the north and is within close proximity to main bus routes. Clarence Place is a controlled parking area as with other surrounding streets due to their central location.

Proposed Development

This application arises as a result of appeal ref: APP/K2230/W/25/3368863 (Gravesend Borough Council application Ref is 20241133) being dismissed in October 2025 for the erection of a 4 storey building comprising of 4 no. flats.

This supporting statement is focused on addressing each of the reasons for the dismissal of the appeal.

The proposal is effectively the extension of the terrace which is Clarence Place to the west on the southern side of the road.

More detail on the proposal is provided in the analysis section.

The plans demonstrate secure cycle storage to the rear of the proposed building, with spaces for 4no. bicycles. This is in accordance with Gravesend's adopted parking standards (SPG4) (2006).

Relevant Planning History

Planning application reference 20241133 was refused on the following grounds :

'1. The proposed development fails to preserve or enhance the special interest of the Windmill Hill Conservation Area by virtue of developing an established, landscaped open space and detracts from historic local key unlisted buildings through poor design that disrupts cohesive qualities within the street scene. Therefore, by virtue of developing an important landscaped buffer and the incongruous design of the building the proposal fails to meet the statutory tests of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and is contrary to Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014), saved policy TC3 of the Local Plan First Review (1994) as well as Section 12 and 16 of the National Planning Policy Framework (2024).

2. The applicant has failed to provide any ecological evidence to confirm protection of notable species or inform a habitat regulations assessment to address the impact of the proposed development on the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) or offered a financial contribution towards the identified mitigation measures to address the impact of the development on the SPA/Ramsar site. The proposal is therefore contrary to Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy (2014) which seeks to ensure that detrimental effects on the integrity of SPA/Ramsar sites are avoided, and also contrary to Paragraphs 192 and 193 of the National Planning Policy Framework (2024), and the requirements of the Conservation of Habitats and Species Regulations 2017.'

Policy Background

Gravesham Council does not enjoy a 5-year housing land supply nor does it have an up to date Development Plan. However, the application site is within a Conservation Area (Windmill Hill) and footnote 7 to paragraph 11d of the National Planning Policy Framework (NPPF) does refer to heritage assets and so a Conservation Area would fall within this category.

Paragraph 212 of the National Planning Policy Framework (Dec 2024) states that :

'212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport

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- CS12 – Green Infrastructure
- CS14 – Housing Types and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and 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) •
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
 - Design for Gravesham – Design Code (2024)
- Windmill Hill Conservation Area Character Appraisal (2007)
- Management Plan Gravesend Town Centre Conservation Areas (2009)

Local Plan policies referencing the character or appearance of Conservation Areas are set out in Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy Adopted September 2014 and Policy TC3 of the Gravesham Local Plan First Review Saved and Deleted Policies Version (September 2014). These policies seek, amongst other things, that developments preserve, protect and enhance the historic environment and that the significance of heritage assets, including conservation areas, are taken into account.

The Inspector states that the Windmill Hill Conservation Area Appraisal is 2009 whereas the document states that:

‘This document was prepared on behalf of Gravesham Borough Council based on an extensive survey dated 2007....’

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

A separate Heritage Statement is submitted as part of this planning application.

Analysis:

Appeal decision

The recent appeal decision is an important material consideration in the determination of this planning application and, therefore, it is necessary to examine why the Inspector dismissed the appeal and the response this revised application makes to each point.

The application site is located within the Windmill Hill Conservation Area. There is a legal duty for the local planning authority under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the Local Planning Authority to have special regard to the desirability of preserving or enhancing the character or appearance of the conservation area.

Therefore, the key issue was impact on the character and appearance of the Windmill Hill Conservation Area and this can be broken down into specific overlapping elements :

1. *Spaciousness of street scene including front boundary detailing:*

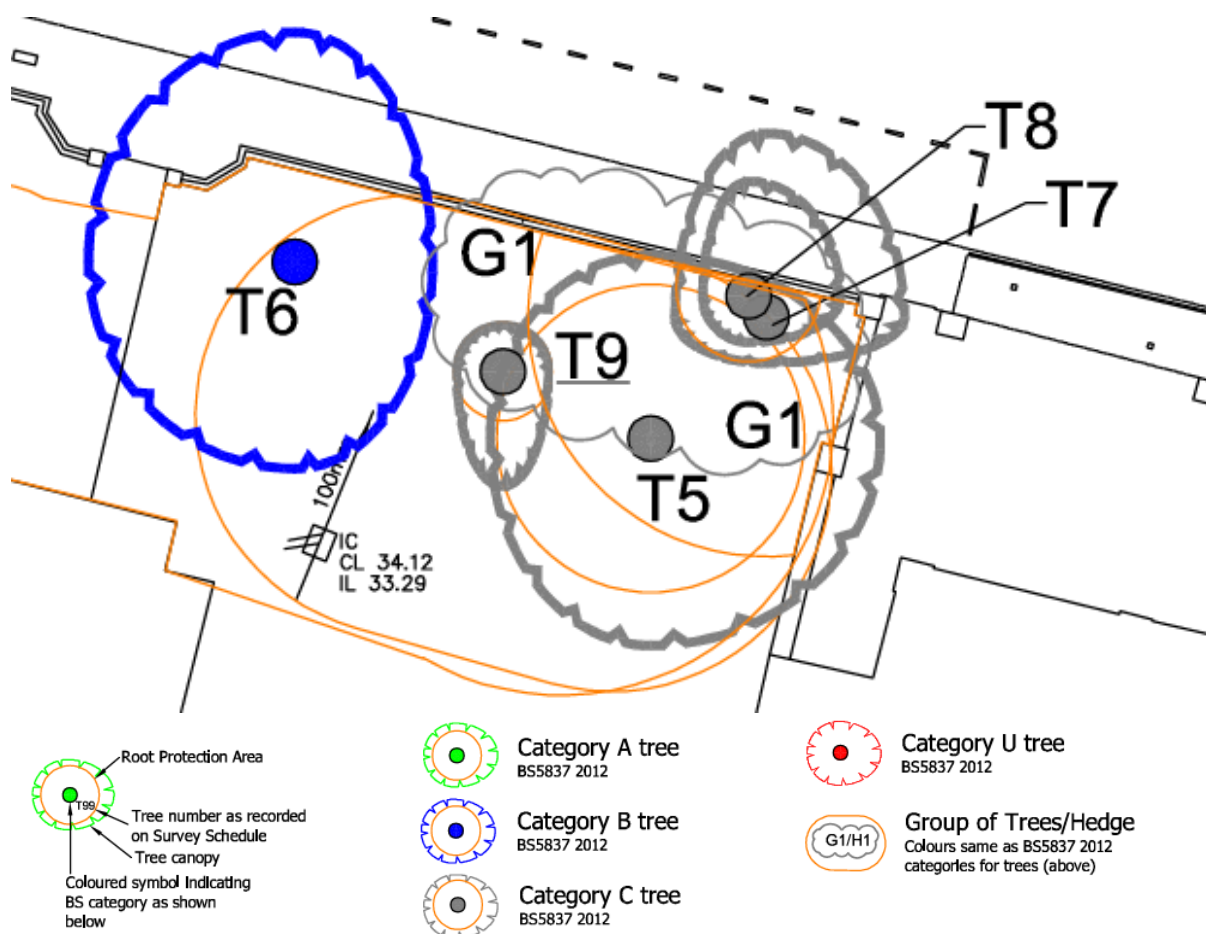
The Inspector identifies that there are more gaps between buildings on the southern side of Clarence Place. For example, in paragraph 6 he states,

“with open spaces that form a green and open character with mature individual trees and tree groups present.”

As can be seen from the photographs below, it is only the sycamore trees which would be lost (all category C trees as per the British Standard) rather than the mature flowering cherry tree to the left of the Veterans Club entrance which is a Category B tree.

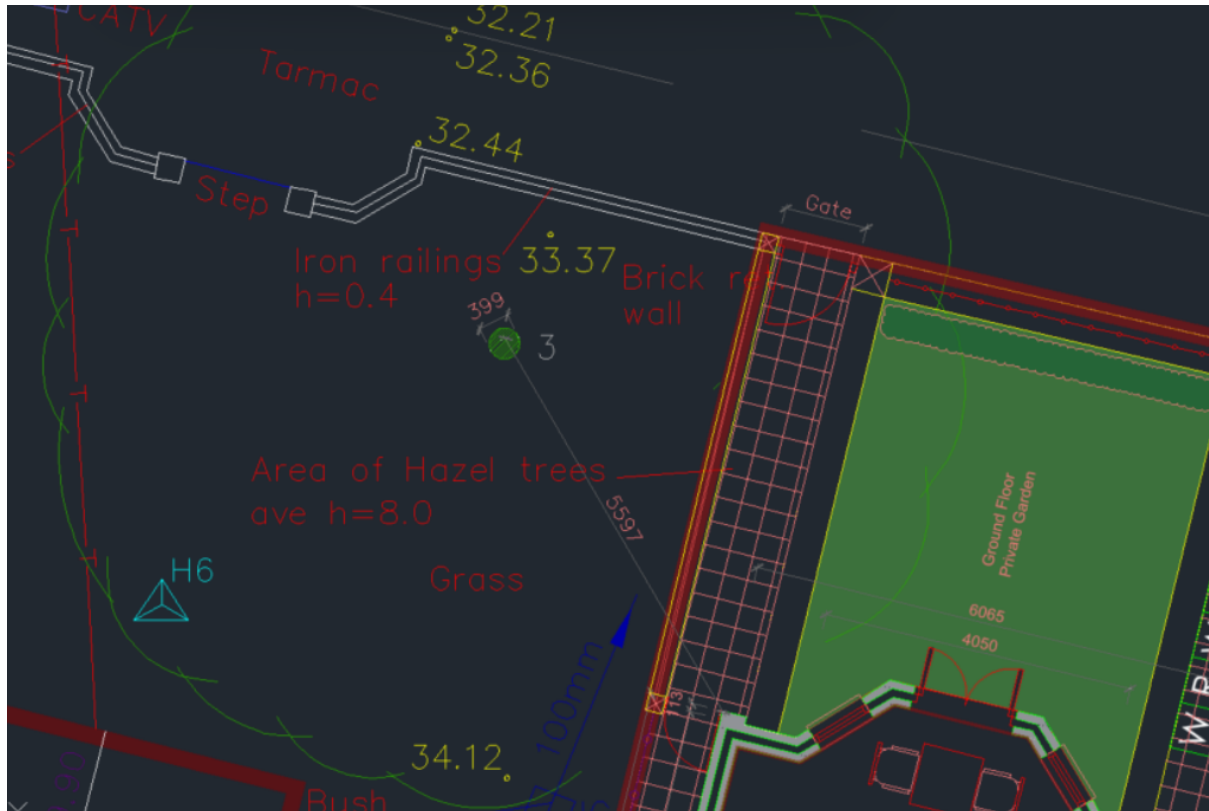


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The [website RPA Calculator](#) (calculated to BS 5837:2012) has been used to determine the RPA Radius.

The remaining hazel tree has a trunk stem diameter of 40cm. The RPA is therefore 4.8m. The proposed building is set 5.5m away and therefore outside of the remaining trees RPA. Screen shot below



Therefore, the mature tree would remain.

In paragraph 7, the Inspector goes on to opine that:

“Front boundary treatments generally consist of brick walls, railings and a combination of both, but in most cases the front gardens remain visible adding to the spaciousness of the street scene.”

The front wall (not the bay window) is now set back further into the plot and is behind the building line of the terrace of Clarence Place. This space is given over to a front garden with a Privet hedge proposed behind railings and a dwarf wall with brick piers.

Therefore, it is considered that spaciousness is maintained together with planting and contextual / vernacular boundary treatment to create defensible space which is a key characteristic of the CA.

The railings and bricks in situ can be reclaimed and used on the proposed development and this can be the subject of an appropriate planning condition.

2. Importance of the green space within the Conservation Area:

The CA appraisal states that

‘5.2 Many of the buildings within the Windmill Hill Conservation Area are set back from the pavement line behind front garden areas. This enhances the spacious character in wide streets such as Clarence Place. The common built form is of the paired villa, with interesting spaces created between, and glimpses through to rear gardens beyond; the overall impression is of harmonious groups of buildings, rather than an unbroken building line’

As stated above, a front garden is proposed, and the front wall is set back. In addition, there would be a clear separation between the proposed building and the adjacent Veterans Club with the mature tree being retained with views of Windmill Hill itself and a foreground of trees in the rear of the grounds of the Club being retained.

The key views within the CA are set out in the appraisal.

- The summit of Windmill Hill;
- The Sikh temple Siri Guru Nanak Darbar Gurdwara;
- Tivoli House;
- Ashley Down Nursing Home (no. 29 Clarence Place);
- No. 1 Parrock Road;
- War Memorial, Windmill Gardens;
- Nos. 1-4 Constitution Crescent;
- Echo Lodge;
- 5-7 Parrock Road

Specifically for Windmill Hill the appraisal states that

‘The green tree-covered slopes of Windmill Hill can be seen from a number of locations within and outside of the Conservation Area, with some of the clearest views obtainable from Clarence Place.’

As stated above, views will still be gained of Windmill Hill.

3 Height and integration with adjoining villas

The proposed building has been reduced in height from 4 storeys to 3 storeys, so it acts as a book end and cascades down from no. 35 so that the pair of villas (i.e. 33 and 35) remain the dominant buildings at the end of the terrace.

The architectural and historic detailing such as the parapet wall and bay window etc contextualise the proposal whilst not making it visually compete with the pair of villas in terms of faithful mimicry.

It is accepted that the flank wall will be important visually and so fenestration and variation of materials have been employed to create architectural / visual interest. The flank wall of the neighbouring property is largely featureless and is not a positive aspect of the Conservation Area.



Other matters

- A **Preliminary Ecological Assessment** (PEA) is submitted alongside a revised Biodiversity Net Gain assessment including the small sites metric.
The PEA shows that the predominant habitat is species poor modified grassland or, in plain English, a mown lawn.
No protected species were found on site nor is the habitat a significant opportunity lost for protected species.
- **Biodiversity Net Gain Assessment** has been submitted and this is a revised version of that submitted with the refused planning application (ref. 20241133). This indicates, at this stage, that off site credits are required and this can be the subject of a planning condition or a s106 legal agreement. If permitted, a Biodiversity Gain Plan would need to be submitted with a another final small sites metric completed.
- **Recreational Pressures on the Thames Estuary and Marshes Special Protection Area (SPA) and SAMMS** : The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. It is acknowledged that 3 apartments would theoretically put more recreational pressure on the SPA. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Gravesham Council have decided to impose a tariff on new housing development. Developers will

need to pay £328.27 for every new dwelling and the applicant is happy to enter into a legal agreement to secure a financial contribution to the SPA via SAMMs

- Cycle parking is provided as is permeable paving and ecological enhancements such as bat and bee bricks with details set out in the PEA.

Conclusion

The scheme has been significantly altered in order to overcome the Inspector's sole reason for refusal in that it is a storey less in height and is set back further with more contextual architectural detailing.