



6th November 2024

Development Control Services
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent DA12 1AU

7 Wrotham Road, Gravesend – New window openings, replacement windows and associated alterations

Dear Sir or Madam,

Please find enclosed an application for new window openings, replacement windows and associated minor alterations to the façade at 7 Wrotham Road, Gravesend. The application follows on from a recent pre-application meeting (PRE/2024/0198) and a prior approval application for a change of use from commercial to residential (11 units) approved in January 2024 (20231143).

As discussed recently on site, the works to convert the building to a residential use are all internal and have been progressing quickly over the past few months. However, a need to repair or replace old single pane glass windows has been identified and this was originally due to be considered as part of a proposal to further extend the building at roof level. Due to the timing of the development it is now necessary to progress the windows application separately.

The Site

The property comprises 7 Wrotham Road and a large 1960s office extension to the rear, fronting Cobham Street (Figure 1). The original building was in residential use prior to being extended and converted to office use. As described above, a recent application for Prior



Approval under Class MA Part 3 Schedule 2 of the GPDO has been approved which will convert the building to residential use in its entirety, as 11 flats. Work has already commenced on this conversion.

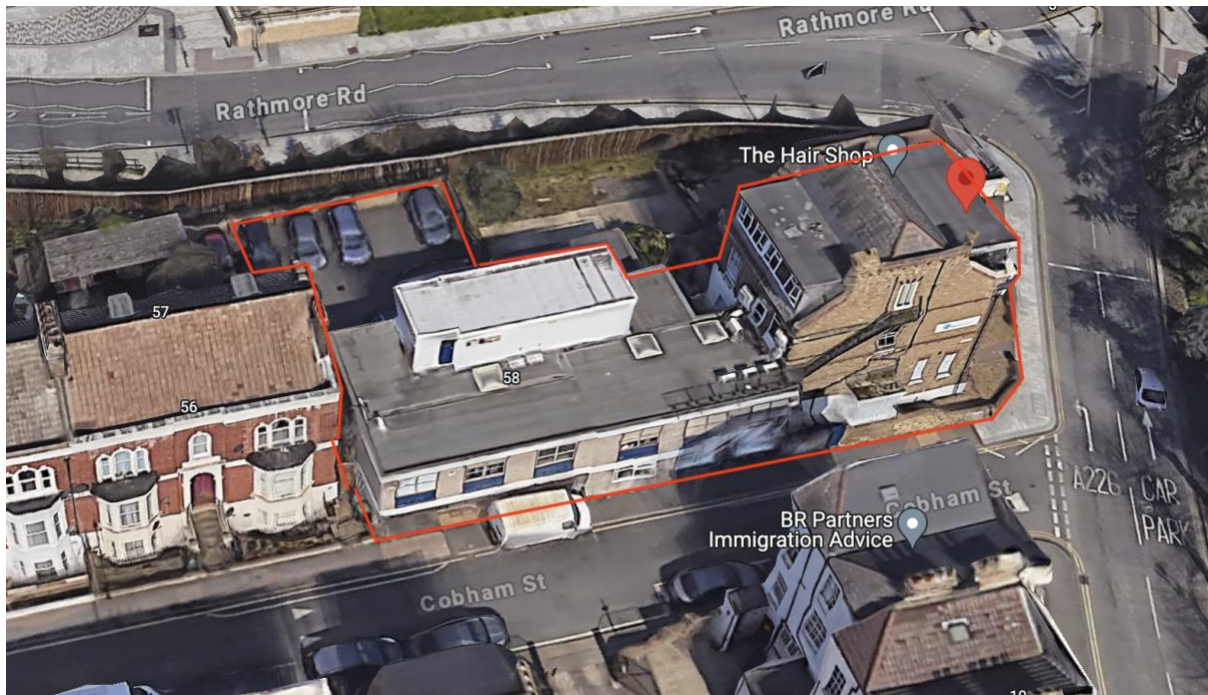


Figure 1 – Proposal site

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, which was approved in 1988. There is a car park to the rear of the extension that is accessed via an undercroft.

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.

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.



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, with the middle portion outside of any designation. The associated Conservation Area appraisals note the existing building extensions to be negative features in the area.



Figures 2&3 – Upper Windmill Conservation Area (Left) Darnley Road Conservation Area (Right)

Planning History

The following planning history for the site is considered relevant:

- PRE20240198 – Pre-application meeting to discuss an amended scheme for a roof level extension and alterations to the façade (including new windows) – **Meeting held on 24th September.**
- 2024/0070 - 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 – **Refused 4th April 2024**
- 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**

The Proposal

The proposal primarily seeks to insert new window openings to provide better levels of internal daylight and to replace existing windows that are not fit for purpose. Some minor alterations to the façade are proposed to infill and “make good” gaps created by the removal of wooden panelling associated with the old window system (Figure 4). In this instance, matching bricks will be used in order to minimise the impact on the appearance of the façade. There is a need for to provide new window openings to improve internal accommodation and to close up part of one window opening where it conflicts with the internal layout. The purpose of the amendments and the proposal in general, is to provide a better internal environment for future residents. The windows to be replaced are not fit for purpose in terms of their thermal efficiency and noise mitigation. The proposal will therefore improve the quality of life of residents and the sustainability of the building as well as providing a visual enhancement.



Figure 4 – Existing window with wooden panelling partially removed.



Within the original part of the building (at the front of the site), it is proposed to retain and repair existing windows where possible, with secondary glazing added internally. As many windows are beyond repair, replacement double glazed timber sash windows have been selected to match. The application drawings and window schedule confirm which are to be replaced and which retained. In order to avoid any potential visual inconsistency, the replacements will be floor by floor and elevation by elevation so old and new windows are not placed immediately adjacent to one another. There are a small number of new window openings which will improve the internal accommodation allowing more daylight into the living space. These are primarily located to the rear or in areas that are not particularly visible and don't affect the rhythm of the existing fenestration.

Within the 1960s extension (at the rear of the site) the majority of the windows will require replacement, with some new insertions at the rear as indicated on the plans. This will require the removal of the wooden framing and panelling around them. Although this was a deliberate architectural feature it is considered unattractive and won't be replaced. Instead this will be infilled to match the existing. Discussions held on site regarding the potential painting or rendering of the building will be considered as part of a future application.

Planning Policy

The relevant policy considerations are set out in the officers delegated report for the refused application.

Of particular relevance to the proposal are the policies relevant to design and heritage. The other key policy considerations are the amenity of residents with respect to noise mitigation, ventilation, access to daylight and outlook, and the overall energy efficiency of the building.

All policies and guidance considered relevant to the proposal are listed below:



Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC3 – Development Affecting Conservation Areas

Supplementary Planning Guidance

- Conservation Areas: Maintenance/Replacement Windows and Doors Guidance SPD
- Upper Windmill Street Conservation Area Character Appraisal (2009)
- Darnley Road Conservation Area Character Appraisal (2009)
- Management Plan Gravesend Town Centre Conservation Areas (2009)

National Policy and Guidance

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)
- Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
- British Standard BS EN 17037 Daylight in Buildings
- BRE Site layout planning for daylight and sunlight – A guide to good practice (2022)

Planning Considerations

The main planning considerations relate to design, sustainability and amenity of occupants.

Design

The proposal will have a minimal impact on the design of the building as the replacement windows have been selected to reflect the existing style, and the new window openings are not on the primary facades and are located to sit comfortably with the existing fenestration.



The replacement of the wooden frames and panelling around the windows in the 1960's extension is much needed and will have no negative effect on the design. The replacement brick infill will match the existing and will in itself be neutral, whilst the overall effect of replacing windows will have a minor positive impact on the building and the streetscene. Officers have been made aware of proposals to further improve the building in the future.

Heritage

As described earlier, the building straddles two conservation areas, with the central section falling outside of both. There is an Article 4 Direction in place preventing the replacement of windows without planning permission. Notwithstanding that the central part of the building does not fall within this area and windows can be replaced without permission, an application would still be necessary to infill the panelling and to cover the parts of the site that do fall under the direction. Arguably that also may not include the front part of the building, where timber framed sash windows are being replaced like-for-like:

“Use of purpose made or high-quality factory made timber doors and frames.

Planning permission not required if doors and frames are an exact copy, like-for-like, or replica” Conservation Areas: Maintenance/Replacement Windows and Doors

Guidance SPD

Nevertheless, it is prudent to include all windows within the application for assessment. The specification of these windows is included as part of the application and the existing and proposed elevations and detailed drawings illustrate that the aim of being like-for-like will be met. The replacement of windows considered beyond repair will have an instant impact in terms of the restoration of a building that is already considered to have a “positive impact” in the Upper Windmill Conservation Area.

Conversely, the 1960s extension is highlighted in the Darnley Conservation Area appraisal as a “negative feature”. The Town Centre Areas Management Plan seeks enhancements of buildings which make a negative or neutral contribution. The proposal will assist this aim through the replacement of windows with high quality alternatives and the removal of the unsightly blue panelling. The Conservation Areas: Maintenance/Replacement Windows and Doors Guidance SPD supports the use of uPVC sliding sashes where they are on non-principle



or non-public elevations or where they do not harm the character or appearance of the conservation area taking into consideration the age and style of the building and its immediate surroundings. The existing windows on the building are not attractive or worthy of retention and it has been pre-agreed with officers that uPVC sash windows would be suitable for this part of the building.

Amenity of Future Occupants

The key purpose of the proposal is to improve the amenity of future occupants of the building by soundproofing the flats consented under the prior approval application, via the replacement of outdated single glazed windows with high specification double glazing. The windows will also be more thermally efficient whilst being openable to allow for natural ventilation. The limitations of prior approval mean that only internal changes can be made to the building which often means that opportunities for optimum layouts and improved daylight are missed. The proposal will seek to rectify this by introducing some new window openings to rooms that could benefit from more daylight.

Sustainability

The proposal will replace aging single paned windows with thermally efficient double glazing preventing heat loss in the winter and heat gain in the summer.

Conclusion

The applicant has sought to engage with the Council in a proactive manner to agree the window types.

The proposal is minor in nature and dovetails with a change of use application for the main building which is already in the process of implementation. The proposal will allow the continuation of these works whilst a further application is considered to extend the building and improve the façade. In the meantime, the replacement windows will bring the building back into active use whilst improving its external appearance and thereby enhancing the character of the conservation area.



The Application Submission

In order to complete this pre-application submission, please find attached the following documentation:

- Site Location Plan;
- Existing and Proposed Plans and Elevations;
- Window Schedule and detailed window drawing;
- Window specification sheets;
- Planning statement (this letter);

I trust that the above is clear and we look forward to receiving notification that the application has been registered in due course. Should you have any queries in relation to any of the attached information, please do not hesitate to contact me.

Yours faithfully,

Ben Kelly MRTPI
Director