

PLANNING STATEMENT

(incorporating Design and Access Statement)

Proposed conversion of undercroft car park to provide 10 no. flats, with associated ancillary residential communal space and plant room. Proposed cycle parking storage and the provision of private outdoor amenity space. Façade alterations and minor amendments to lower ground floor internal layout granted under application reference 20221183.

at

Joynes House, New Road, Gravesend, Kent DA11 0AJ

1.0 Introduction

- 1.1 This statement has been prepared to support a planning application for the conversion of the existing undercroft car park at Joynes House to provide 10 flats, together with ancillary communal space and plant area within the existing lower ground level and the provision of external private amenity space and cycle storage facilities. In addition, amendments are sought to the internal layout granted under 20221183, in respect of the lobby lounge/cycle storage and office space areas.
- 1.2 The application is accompanied by the following plans and documents:-
- Site layout plan (including location plan)
 - Existing floor plans
 - Proposed floor plans
 - Existing elevations
 - Proposed elevations
 - Planning Statement (Gemini Planning Services Ltd)
- 1.3 The application follows the prior approval decisions relating to the change of use of the existing building from offices to 65 flats. These applications were first approved on 16th September 2021 under planning application references:-
- 20210974 (26 residential units on part ground, first and second floors), 20210962 (13 units on the third floor),
 - 20210973 (22 units on part-first, second and fourth floors), and
 - 20210958 (4 units on part-ground floor) on 16 September 2021.

- 1.4 Non-material amendments for minor amendments to the internal layout plans were later approved for each of the Class O approvals (see ref 20220390, 2022391, 2022392 and 2022393). The number of flats however remains at 65 units.
- 1.5 Planning permission was granted on 3rd May 2023 for external changes associated with the consented Class O schemes under application ref 20221183. This permission also consented other minor internal layout changes, including the relocation of the entrance foyer to lower ground level.
- 1.6 A Prior Approval application (ref 20221111) was approved on 5 December 2022 for an extension to the top of the building under Class AA, Part 20 of the GPDO to provide an additional 24 flats.

2.0 Site and Surroundings

- 2.1 The application site is located in Gravesend Town Centre on the southern side of New Road, at its corner with Darnley Road.



- 2.2 The site is occupied by a purpose-built five storey office building constructed in the early 1970s. The principal elevation fronts onto New Road with pedestrian access via steps from New Road. The existing building is constructed in red brick with a flat roof. There are glazed fire escape staircases on both sides of the building which are painted in a dark grey colour. The building is currently “in-use” as offices.



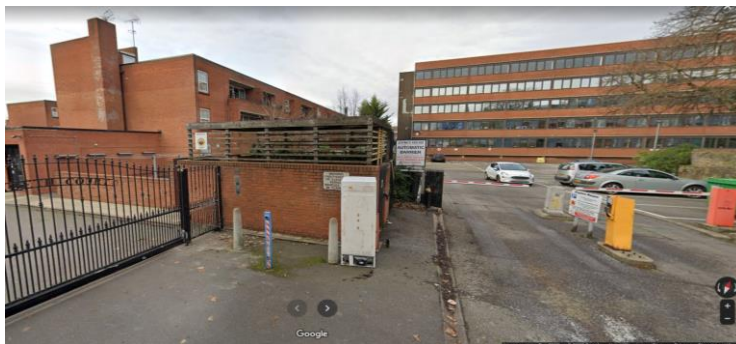
- 2.3 The site has a private car park to the rear, accessed from St James's Road. This also provides access down to the basement/undercroft car park via a ramp.



- 2.4 The site is bounded to the west by a large red brick building known as the Victoria Centre and currently home to the Gravesend Adult Education Centre.



- 2.5 To the west and lying at right angles to Joynes House at the rear is a block of residential properties (part of Elizabeth Court).



- 2.6 To the west and north of the site on the opposite side of New Road and Darnley Road are 2/3 storey buildings in commercial (retail) use at ground floor level with some residential uses above.



2.7



With regard to accessibility, the site lies less than 180m from Gravesend Train Station, with its high-speed link to London St Pancras (journey time 24 minutes).

The A2/M2 lies 2.6 miles to the west.

- 2.8 Gravesend town centre is located to the north and west of the site with its extensive facilities and amenities. As well as the railway station, there are bus stops along New Road and Darnley Road with bus services to Sevenoaks, Chatham, Rochester, Dartford, Ebbsfleet and Blue Water (Shopping Centre). The site also has good accessibility for pedestrians and cyclists.

3.0 Planning History

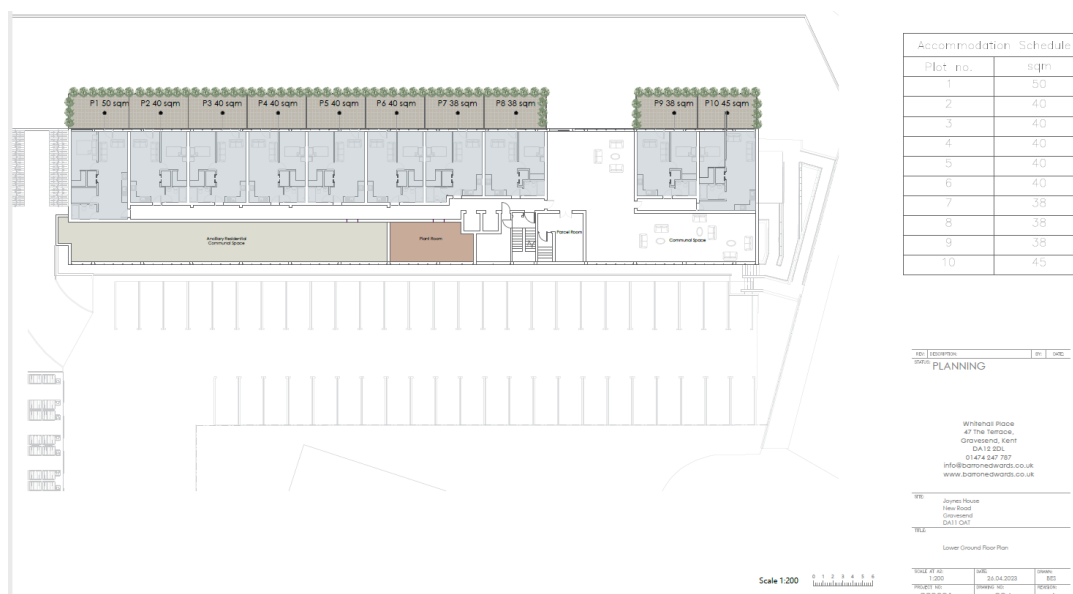
- 3.1 1971082 – Joynes House – Permission 1972.
- 3.2 20010103 - Installation of new pedestrian entrance and access ramp on front (New Road) elevation; alterations to existing entrance; installation of new shopfront at rear; installation of plastic-coated cladding on existing glazed fire escape stairs and new upvc windows. Permission 2001.
- 3.3 20020749 - Construction of new pedestrian access ramp at the side/rear to first floor level and installation of air conditioning condensing units at lower ground floor level. Permission 2002.
- 3.4 20050780 - Joint application under Regulation 3 of the Town and Country Planning General Regulations 1992 for the construction of a rain screen canopy above the main entrance door. KCC GRANTED PERMISSION 6.10.2005
- 3.5 20210974 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part Ground, First and Second Floors from Class E (previously Class B1(a)) (offices) to 26 residential units (Class C3 (dwellinghouses)). Prior Approval required and granted 16 September 2021.
- 3.6 20210962 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 third floor from Class E (previously Class B1(a)) (offices) to 13 residential units (Class C3 (dwellinghouses)). Prior Approval required and granted 16 September 2021.
- 3.7 20210973 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part First, Second and Fourth Floors from Class E (previously Class B1(a)) (offices) to 22 residential units (Class C3 (dwellinghouses)). Prior Approval required and granted 16 September 2021.
- 3.8 20210958 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part Ground Floor from Class E

(previously Class B1(a)) (offices) to 4 residential units (Class C3 (dwellinghouses). Prior Approval required and granted 16 September 2021.

- 3.9 20220390 – Application for non-material amendment to planning permission reference 20210974 to allows minor amendments to internal layout. Granted 20 April 2022.
- 3.10 20220391 - Application for non-material amendment to planning permission reference number 20210958 to allow minor amendments to the internal layout. Granted 20 April 2022.
- 3.10 20220392 - Application for non-material amendment to planning permission reference number 20210962 to allow minor amendments to the internal layout. Granted 20 April 2022.
- 3.11 20220393 - Application for non-material amendment to planning permission reference number 20210973 to allow minor amendments to the internal layout. Granted 20 April 2022.
- 3.12 20220799 - Construction of two additional storeys above the existing commercial building to provide 24 flats, with associated works (under Class AA, Part 20, GPDO). Prior Approval required and refused.
- 3.13 20221111– Construction of two additional storeys above the existing commercial building to provide 24 flats, with associated works (under Class AA, Part 20, GPDO). (Re-submission of 20220799). Prior Approval required and approved 5 December 2022.
- 3.14 20221183 – Proposed external alterations to existing building façade including new windows, cladding panels and infill glazing to lower ground floor. Relocation of existing entrance and lobby from ground floor to lower ground floor and minor amendments to internal layout of 2 no. ground floor residential units consented under reference 20210958, as amended by non-material amendment ref 20220391. Permission granted 03 May 2023.

4.0 The Proposals

- 4.1 The proposals are to convert the existing undercroft car park to provide 10 no. 1 bed flats.
- 4.2 Internally each of the proposed flats will comprise an open plan kitchen/lounge/dining space with a separate bedroom. The 1b1p flats will have a GIA of at least 38sqm and the 1b2p flat will have a GIA of 50 sqm. All units will comply with the nationally described space standards in terms of floorspace, storage, bedroom dimensions and floor to ceiling heights and with the Building Regulations Part M4 (2) and (3). (See separate Space Standards document).
- 4.3 The lower ground floor plan also shows ancillary communal space for residents, along with a plant room.



- 4.4 Externally, each of the proposed flats will have the benefit of a private amenity terrace. These will range in size from 20.8m² – 22m and will utilise the existing space between the undercroft level and the landscaped bank fronting New Road.

Unit	Private garden size (sqm)
1	21.5
2	20.8
3	20.8
4	20.8
5	20.8
6	20.8
7	20.8
8	22.0
9	21.8
10	20.8

- 4.5 The proposed external alterations to the southern elevation of the building are limited to the insertion of small windows to replace existing ventilation grills to provide light into the proposed ancillary residential communal space. The glazing for these windows will be obscured. (The vents will remain as existing for the plant room). New windows are also proposed for the stair core, also to replace existing vents.
- 4.6 On the north elevation, the proposed alterations comprise the infilling of the undercroft with windows, doors and aluminium panels, all of which will be dark grey.
- 4.7 The cycle store will be constructed in timber and will have secure access with a keycode lock.

5.0 Planning Policy and Constraints

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.
- 5.2 The Development Plan for the purposes of this application comprises the Gravesham Core Strategy (2014) and the saved policies of the Gravesham Local Plan First Review. The Emerging Local Plan Partial Review, Site Allocations and Development Management Policies is at Regulation 18 stage and therefore its draft policies have limited weight at this stage.
- 5.3 Policy/planning designations include the following:-
- Within Town Centre boundary (CS08)
 - Within Gravesend Town Centre Opportunity Area (CS05)
 - Outside (but adjacent to) Conservation Areas (including Overcliffe and Darnley Road CAs)
 - Outside (but opposite) Primary Shopping Area

Gravesham Core Strategy (2014)

- 5.4 The following policies in the Core Strategy are considered to be relevant to the application:-
- **CS01: Sustainable Development** - Requires applications that accord with the development plan to be approved unless material considerations indicate otherwise. Presumption in favour of sustainable development applies.
 - **CS02: Scale and Distribution of Development** - Quantifies the total dwellings to be provided (6,170) and identifies Opportunity Areas and Rest of Urban Area as the main focus for housing. Prioritises development in urban area as sustainable location for development and promotes regeneration by prioritising redevelopment and recycling of underused/previously developed land.
 - **CS05: Gravesend Town Centre Opportunity Area** - Gravesend Town Centre will be principal focus for town centre related economic and social activity. This will be achieved by consolidating existing retail area, encouraging mix of employment and residential uses, creating a public transport interchange and promoting an evening economy. The policy supports new residential development where satisfactory living environment can be achieved, as well as supporting existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors, subject to achieving a satisfactory living environment.

- **CS07: Economy, Employment and Skills** – resists the loss of office floorspace unless *“otherwise allowed-for in the Core Strategy or ... the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5)”*
- **CS11: Transport** – Requires developments to mitigate impact on highways/public transport. Parking provision in accordance with adopted parking standards. Supports proposals to improve public transport e.g. cycling facilities in new development.
- **CS12: Green Infrastructure** – Protects designated sites for biodiversity value. Requires no net loss of biodiversity.
- **CS13: Green Space, Sport and Recreation** - Provision for green space, playing pitches, other sports facilities. Provision standards apply to new development. On-site provision required but if not possible alternative provision or enhancement of existing facilities required off-site. All cases require ongoing maintenance provision.
- **CS14: Housing Type and Size** - New development to provide range of dwelling types/sizes considering existing area character and local need.
- **CS15: Housing Density** - Sites developed at variety of densities subject to location and accessibility to public transport. Density to achieve good design and doesn't compromise area character subject to: * urban area 40 dph min. and higher at locations close to Gravesend Town Centre and Ebbsfleet. If development fails to make efficient use of land ref. character and location may be refused permission.
- **CS16: Affordable Housing** - Affordable Housing required on all developments of 15 dwellings or more, or on 0.5 ha or more;
- **CS18: Climate Change** - Flood Risk: development directed sequentially to areas at least risk of flooding. Surface water run-off from new development no greater impact than existing use; require new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption). Reduce carbon footprint of Borough by complying with Part L of the Building Regulations; requires development to include low carbon and renewable energy generation inc. combined heat and power unless not technically or financially feasible or are alternative solutions;
- **CS19: Development and Design Principles** - New development must be visually attractive, fit for purpose, locally distinctive, conserve and enhance character of built, historic and natural environment, integrate with local area and meet anti-crime standards. Incorporates sustainable construction standards and techniques, be adaptable, climate change resilient all through specific criteria inc.
- **T1 - Impact of Development on the Highway Network** - Considers traffic impact of development on transport system and ensures all developments are adequately served by highway network.
- **P3 - Vehicle Parking Standards** - Development to provide parking on site, in accordance with KCC Vehicle Parking Standards, as interpreted by GBC, unless exception justified.

Gravesham Local Plan First Review (1994) - Saved policies

- TC3 - Development Affecting Conservation Areas
- P3 – Parking

5.4 The Local Plan Part 2: Draft Development Management Policies Document is at an early stage of preparation (Regulation 18) and therefore only carries very limited weight for decision-making in the Borough. The site is not included as a draft site allocation.

Planning Guidance

5.5 Other guidance includes:-

- Residential Layout Guidelines (Adopted February 1996 - amended June 2020)
- KCC SPG 4 (2006): maximum requirement of one space per one-bedroom unit and two spaces per two-bedroom units;
- KCC Interim Guidance Note 3 (2008): City/Town Centre Schemes - maximum one space per one/two-bedroom unit; and
- KCC Emerging Design Guide Standards (2021): City/Town Centre Schemes - maximum one space per one/two-bedroom unit.

6.0 Planning Considerations and Assessment

Principle of Development

6.1 The application site is located within the heart of Gravesend and in an area which is identified an opportunity area and the focus of both commercial and social activity, as confirmed by Policy CS05. The proposal relates to an undercroft car park rather than useable office space per se. There will therefore be no office floorspace lost as a result of this proposal and therefore no conflict with Policy CS07. In any event it is argued that Policy CS07 is out-of-date because it is out-of-sync with current national policy in the NPPF (Paragraphs 119 and 120).

NPPF Paragraph 120:- *“decisions should... “d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”*⁴⁸

6.2 Policy CS05 also pre-dated the introduction of permitted development rights to re-purpose office buildings for residential use, initially under Class O, and which first came into force in 2015. It is a fact that all four existing floors of the office building benefit from permitted development rights to be converted to residential flats, as consented under separate Class O Prior Approvals. Therefore resisting this application on the basis of Policy CS07 would be unreasonable and counter to the

aims of national policy which seeks to make efficient use of existing buildings and sites.

Housing Supply and Delivery

- 6.3 This scheme will deliver 10 flats (in addition to the 65 flats already consented through the Class O prior approvals and the 24 flats through the Class AA prior approval) and thus will make a valuable contribution to the Borough's housing supply, in compliance with Policy CS02. Furthermore, if approved, the scheme can be built out and delivered at speed. This is a recognised benefit of small and medium sized sites, as set out in the NPPF in Paragraph 69:- *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly..."*
- 6.4 It is noted that the latest housing supply position statement confirms that the Council can only demonstrate 3.27 years of housing supply, and therefore well below the 5-year requirement. Furthermore the Council has failed to meet the Housing Delivery Test. As such, should the Council consider that the proposals are in some way contrary to the Development Plan, Paragraph 11d of the NPPF would come into play, meaning that the policies most relevant to the application are considered out-of-date and the 'tilted balance' /presumption in favour of sustainable development is triggered. In this scenario, permission should be granted unless:- *"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"*. (See Planning Balance below).

Housing Mix

- 6.2 The proposal for 10 units is below the affordable housing threshold in terms of both number of units and the site area and therefore no affordable housing is required by policy. The proposed mix of units (i.e. all 1-beds) should be seen in the context of the overall mix of units already consented by the Class O and Class AA prior approval schemes. These comprise predominantly 1-bed units, although there will be a total of 26 x 2-bed units too. It is considered that this housing mix is wholly appropriate for this town centre location and as such complies with Policy CS14 and NPPF Paragraph 62.

Residential amenity and standards

- 6.3 As set out above, each flat will meet the nationally described space standards and will have ample natural daylight and sunlight, as demonstrated by the accompanying Internal Daylight Assessment (T16 Design). The internal layout has been designed so that living rooms and bedrooms in different flats do not directly adjoin each other. Furthermore, each flat will have good outlook and privacy as well as the use of a private outdoor amenity area. It is arguable that the SPG requirements relating to minimum garden sizes do not directly apply to this application as the proposed units are not new dwellinghouses but flats where instead the guidelines set out a requirement for a communal garden area equivalent to a minimum of 10 sq. metres for amenity space. This application provides a minimum of 20.8sqm of private garden space per flat, which is

considered to comply with the spirit and purpose of the guidelines.

- 6.4 In addition, the flats will benefit from the improvements shown in application reference 20221183 including an improved entrance, at level, and a lobby lounge. Additional indoor communal space for prospective residents (which may include shared workspace/relaxation space) will encourage social interaction and foster a sense of community.
- 6.5 There will be no additional impacts on adjoining residents in Elizabeth Court as a result of the proposals.
- 6.6 For the above reasons, the proposals are aligned with residential amenity policies in Policy CS19, the NPPF and the Residential Layout Guidelines SPG.

Accessibility

- 6.7 The occupiers of the proposed flats will benefit from the proposed accessibility improvements proposed as part of application 20221183. The current arrangements for accessing the building are not ideal due to the entrance being above street level and requiring users to navigate steps/ramps. The proposed flats will have level access via the new entrance and spacious lobby at lower ground floor level and will also comply with Part M Building Regulations regarding accessible and adaptable dwellings. As such the proposals fully accord with policy objectives and requirements set out in Policy CS19.

Visual amenity

- 6.8 Policy CS19 'Development and Design Principles' sets out the Council's aspirations regarding the need to achieve good design and attractive built form.
- 6.9 The proposed external alterations associated with this application are part of an overall strategy for the upgrading of the façade, as shown in the recent planning application (Ref 20221183). They will ensure a consistent architectural language from this lower ground floor level up through the building. At lower ground level, the proposed infill cladding (dark grey) and fenestration (dark grey frames) will only be noticeable in short distance views and will have little if any impact on the external appearance of the building as a whole. It is considered that there is no reason on visual impact grounds to object to the proposals on the basis that the proposals comply with the design policy set out in CS19.

Impact on heritage assets

- 6.10 The application site lies close to a number of Conservation Areas, the nearest being The Overcliffe and the Darnley Road Conservation Areas. For the reasons noted in above, the proposed external alterations will ensure that any impacts on the conservation area will be inconsequential and negligible, if not marginally beneficial. For this reason the heritage impact tests set out in the NPPF will not be engaged and the proposals will meet the policy tests set out in policy CS20.

Highway and parking matters

- 6.11 The proposal will create an additional 10 residential units, in addition to the 65 units consented under Class O Prior Approvals, and the 24 units consented under the Class AA Prior Approval for the extension to the top of the building. In a

scenario that all of the previously consented schemes are implemented, together with the current proposal, this would bring the total number of residential units to 99.

- 6.12 The undercroft car parking spaces were not ear-marked/conditioned to provide car parking for any previous consented schemes.
- 6.13 As set out in the Transport Statement, Kent County Council parking standards requires a maximum of 1 parking space per 1 bed flat. However, the standards also allow parking below the maximum standard in sustainable locations to help encourage non-car modes of transport.
- 6.14 The Transport Statement concludes that:- *“the location of the site is considered to be in accordance with the prevailing national, regional and local transport planning policy, in particular, placing an emphasis on sustainable travel above private car use and encouraging sustainable development”*.
- 6.15 In terms of car parking, adopted and emerging policies limit the number of parking spaces to a maximum of 99 for this site, (in the event that all consents are implemented). The Transport Statement sets out how, on the basis of the census-based car ownership review for this local area, there would be a demand for 0.37 car parking spaces per bedroom. Therefore, using this calculation, the proposed development would generate the demand for 54 car parking spaces. The existing surface car park provides a total of 66 car parking spaces which will accord with the projected demand, as well as complying with the maximum policy requirements of 99 car parking spaces.
- 6.16 With regard to cycle parking, the proposed lower ground floor plan shows cycle parking spaces for all of the consented Class O residential units together with the current proposals for 10 units within the undercroft car park, at a ratio of 1 cycle space per flat. This aligns with the KCC cycle parking standards and therefore is in compliance with Policy P3.

Biodiversity

- 6.17 There will be some additional planting provided within the outdoor amenity areas which will make a small but positive net contribution to biodiversity at the site.
- 6.18 It is accepted that given the location of the site within 6km of the designated Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site, the proposed scheme will require mitigation to ensure that the proposed flats avoid having a significant effect on the integrity of the designated site through recreational disturbance. The Applicant is agreeable to providing the requisite mitigation payments.
- 6.19 On the basis of the above, the proposals comply with Policy CS12.

Contamination, noise and air pollution

- 6.20 In considering the re-use of the office building as part of the Class O applications, Environmental Health raised no objections on the basis of contamination risk, subject to the following:- *“The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be*

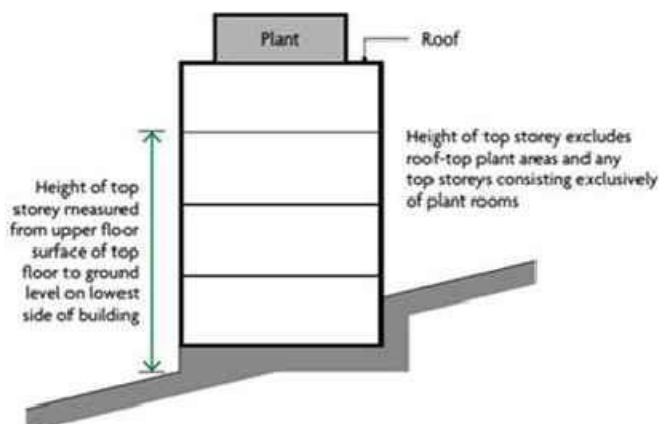
informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out”.

- 6.21 The officer’s report offered the following observations:- *“The previous land use history of the area does not suggest that the site has previously been subject to contamination and the constraints associated with the site do not highlight any past land use such as industrial which may indicate contamination of the site. Given there are no proposed works that would result in excavation into previously undisturbed land, there would be limited risk”.*
- 6.22 Notwithstanding the above, given that this proposal involves the lower ground floor, and therefore if deemed necessary, the Applicant would be content with an appropriately worded planning condition to identify (and then if needed mitigate) any potential contamination risks.
- 6.23 With regard to noise impacts, the previous Class O Prior Approval schemes included noise assessment report which concluded that the main source of noise would be from traffic. Although the report recommended mitigation measures, this was not conditioned on the basis that noise from road traffic was not an issue that could be taken into account under Class O. However, given that this is a full planning application, should the Council deem it necessary, a suitably worded planning condition could be agreed to ensure a satisfactory noise environment will be provided for the proposed 10 units.
- 6.24 With regard to air pollution, this proposal will reduce the number of car parking spaces and will therefore result in a net reduction in air pollution from cars associated with the residential use of the building as a whole. Furthermore, sustainable modes of travel will be actively promoted through the provision of good quality secure and covered cycle storage facilities. There is therefore no valid reason to object to the proposal on air quality grounds.

Other matters – fire safety

- 6.25 The existing building is not a ‘relevant building’ for the purposes of Planning Gateway 1, by virtue of the height measurement which for Gateway 1 is taken from ground level on the lowest side of the building up to the floor surface of the upper floor. (See cross section plan).

Measuring height of building for planning gateway one:



7.0 Planning Balance and Conclusion

- 7.1 The application seeks planning permission to re-use part of the vacant undercroft car park to create 10 additional flat units. The proposals are considered to be acceptable both in principle and in terms of the details. Whilst policy CS7 resists the loss of office space (subject to exceptions), given the proposal is related to a car parking area rather than office space per se, this policy is not considered to be strictly relevant. Even if it is considered relevant, it has been shown that the existing office space within the main building as a whole is out-dated and not attractive to office users, and the building as a whole has consent for conversion to residential use.
- 7.2 In the unlikely event that conflict with Policy CS7 is identified, it is strongly argued that the tilted balance set out in the NPPF Paragraph 11d is triggered (by reason of the lack of a 5-year supply of housing and the failure to meet the Housing Delivery Test, as set out in footnote 8). This would mean that the benefits of the scheme must be weighed against harms and only if there are adverse impacts that “*significantly and demonstrably outweigh the benefits*”, should the application be refused. This approach to decision-making is also endorsed by Policy CS01. (For the avoidance of doubt, regarding footnote 7, there are no specific protection policies that provide a clear reason for refusing the application).

NPPF Extract – Paragraph 11

“For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission 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 proposed⁷; 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.

- 7.3 In this case the social benefits of providing 10 additional housing units should be given considerable weight, particularly in the light of the severe housing shortfall. Economic benefits in terms of employment during the construction/fit-out phase as well as longer term jobs involved in the on-going management and maintenance of the building and associated car park/amenity areas/landscaping should also be afforded considerable weight. Environmental benefits include the upgrading/refurbishment of the existing building which will provide visual and physical improvements to the existing structure, as well as the opportunity to use more efficient and sustainable building materials, to introduce energy and water efficiency measures as well as the introduction of some additional planting within the external amenity areas. The replacement of parking spaces with undercover and secure cycle parking will encourage sustainable modes of transport and will constitute an additional environmental benefit. It is difficult to identify any adverse impacts on the other side of the balance. Even if the loss of the undercroft parking spaces was considered a negative impact, this would not significantly nor demonstrably outweigh the benefits outlined above.
- 7.4 For the above reasons and in accordance with the statutory duty set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be supported and approved.

Report prepared by:-

Ruth Harding (Gemini Planning Services Ltd)

Date: June 2023.

