



# Delegated Report

## Planning Application

Planning Application No: 20250981

Location: 125 Wellington Street Gravesend Kent DA12 1JE

Description: Demolition of outbuildings and conversion of existing house to 1x 4 bed unit and 1x 1 bed unit.

Applicant: Faz Cheema

Site Visit Date: 24.10.2025

### Submitted Documents/Plans

- Application form;
- Drawing no. MDP.WST/01 Rev. B – Location Plan, Block Plans, Section;
- Drawing no. MDP.WST/02 Rev. A – Proposed;
- Drawing no. MDP.WST/012 Rev. A – Existing;
- Drawing no. MDP.WST/021 Rev. A – Elevations Existing Proposed;
- Planning Statement;
- Pre-Application Response.

The drawings were amended to remove the proposed external amenity space with balcony on top of the single storey rear extension which was proposed.

Superseded

~~Drawing no. MDP.WST/01 Rev. A – Location Plan, Block Plans, Section;~~

~~Drawing no. MDP.WST/02 – Proposed;~~

~~Drawing no. MDP.WST/021 – Elevations Existing Proposed;~~

### Relevant Planning History

| Reference | Description                                                                                        | Decision            | Decision Date |
|-----------|----------------------------------------------------------------------------------------------------|---------------------|---------------|
| 20020178  | Re-instatement and refurbishment of front boundary railings, gates, walls & piers.                 | Permitted           | 29.05.2002    |
| 20010680  | Erection of a front porch.                                                                         | Application Refused | 16.10.2001    |
| 19900401  | Erection of single storey rear extension to form enlarged kitchen/dining room, lobby and bathroom. | Permitted           | 17.07.1990    |

### Development Plan

#### Gravesham Local Plan Core Strategy (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

#### Gravesham Local Plan: First Review (1994)

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- P3 – Vehicle Parking Standards
- TC7 - Other Archaeological Sites

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 5 – Delivering a sufficient supply of homes
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well designed places
- Section 15 – Conserving and enhancing the natural 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)

### **Consultations, Publicity and Representations**

#### Consultees

No response:

- Ward Councillors

#### Neighbouring properties

15 surrounding properties were consulted plus site notice – overall consultation expiry date was 14.11.2025 – one response received (in support) which advised they had no problem with the plans and don't have any objections.

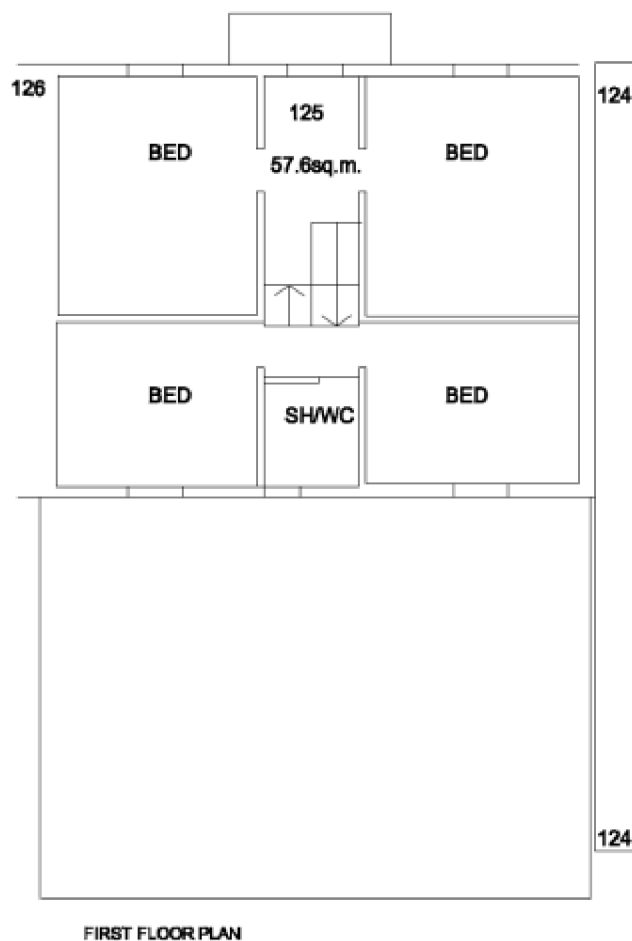
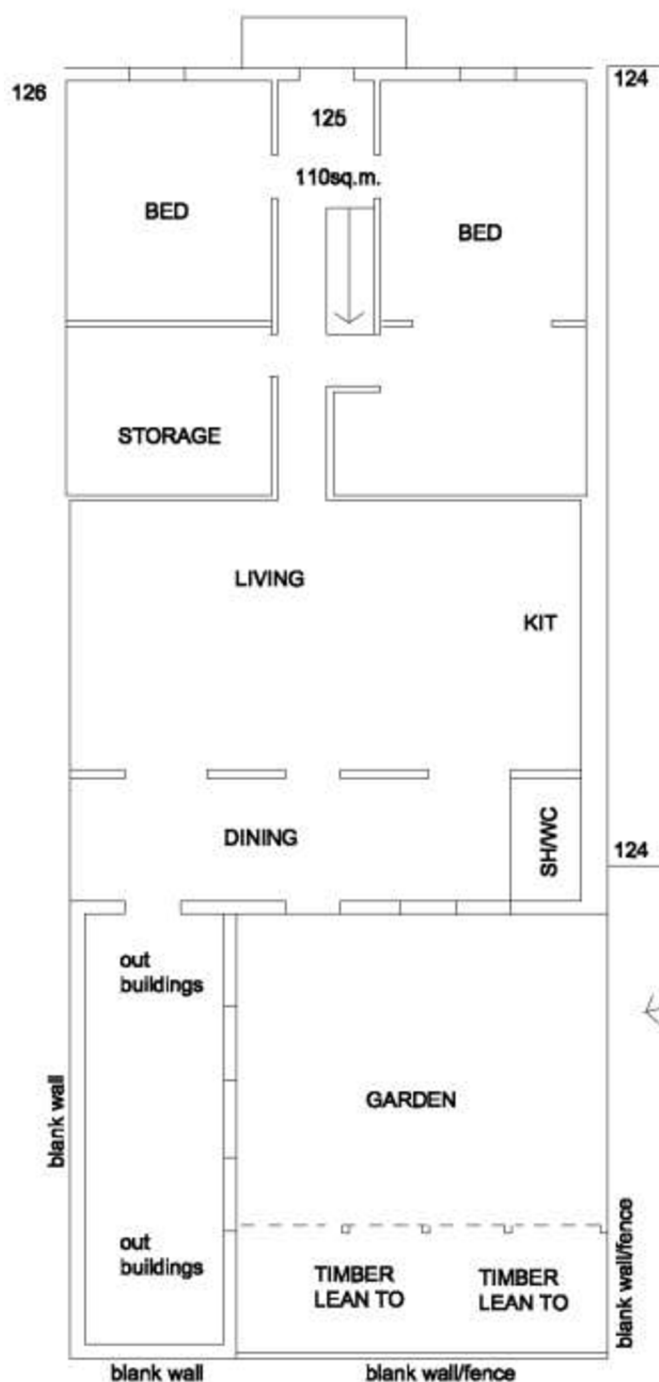
### **Officer's Analysis**

The application site consists of a two storey mid terrace dwelling situated on the western side of Wellington Street. The site is located in an Area of Archaeological Potential and the Thames Estuary and Marshes Ramsar Buffer Zone.

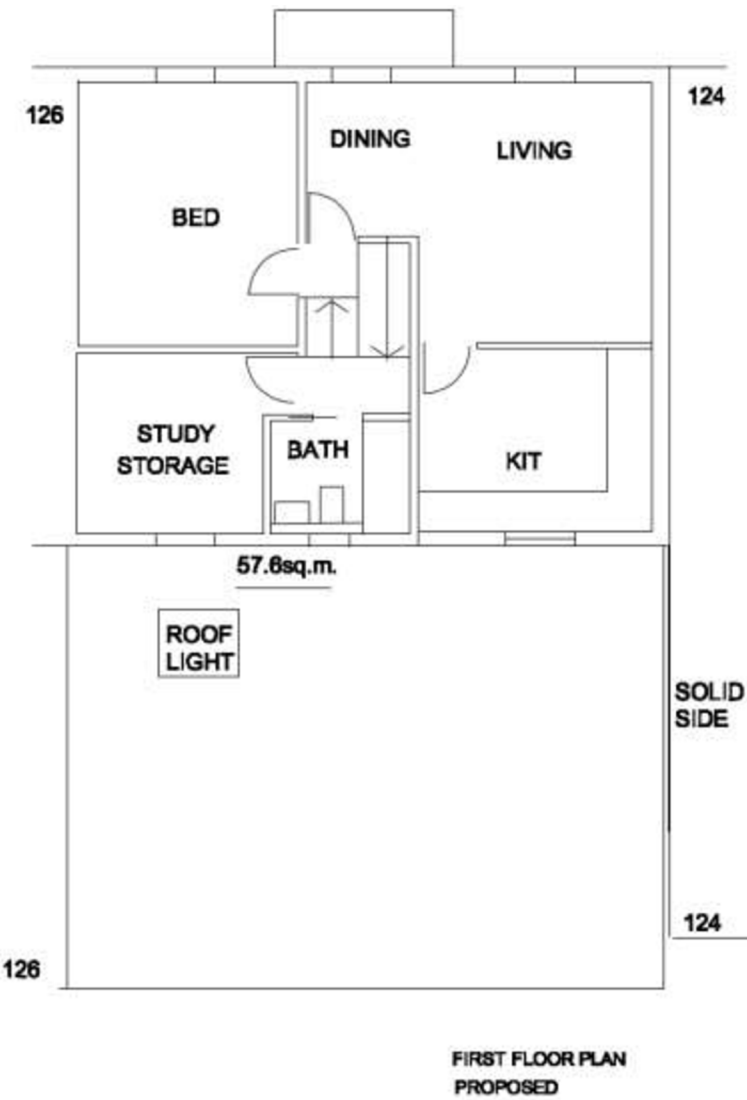
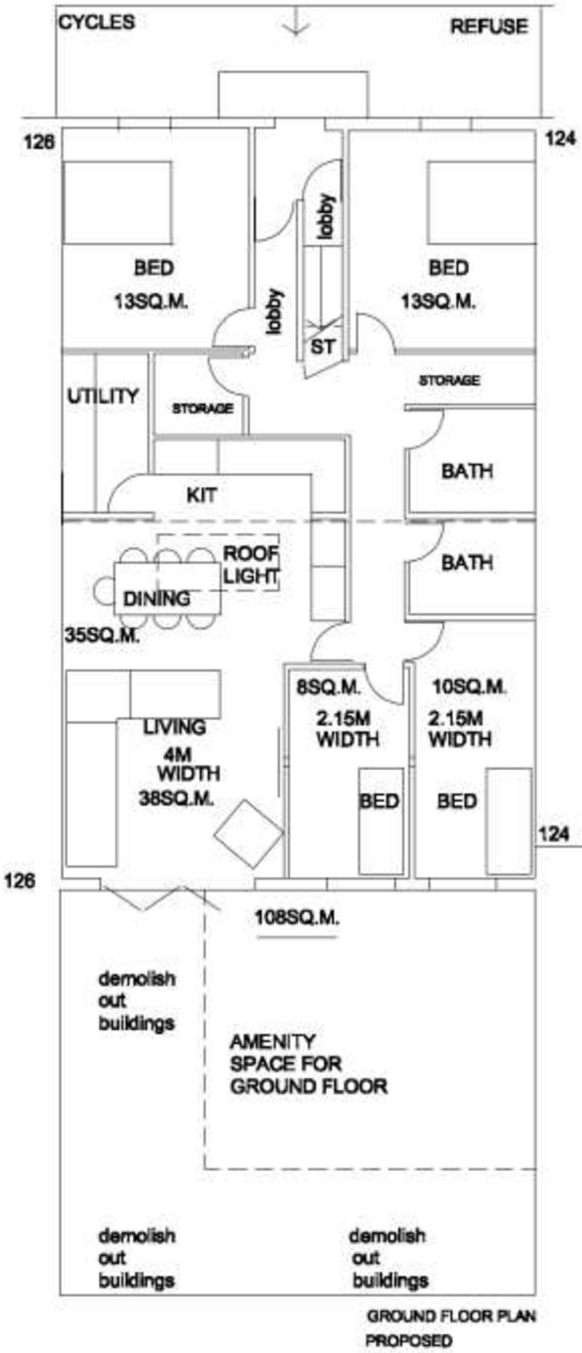
The proposal is for demolition of outbuildings and conversion of existing house to 1x 4 bed unit and 1x 1 bed unit.

For ease of reference the existing and proposed (revised) floor plans and elevations are as follows.

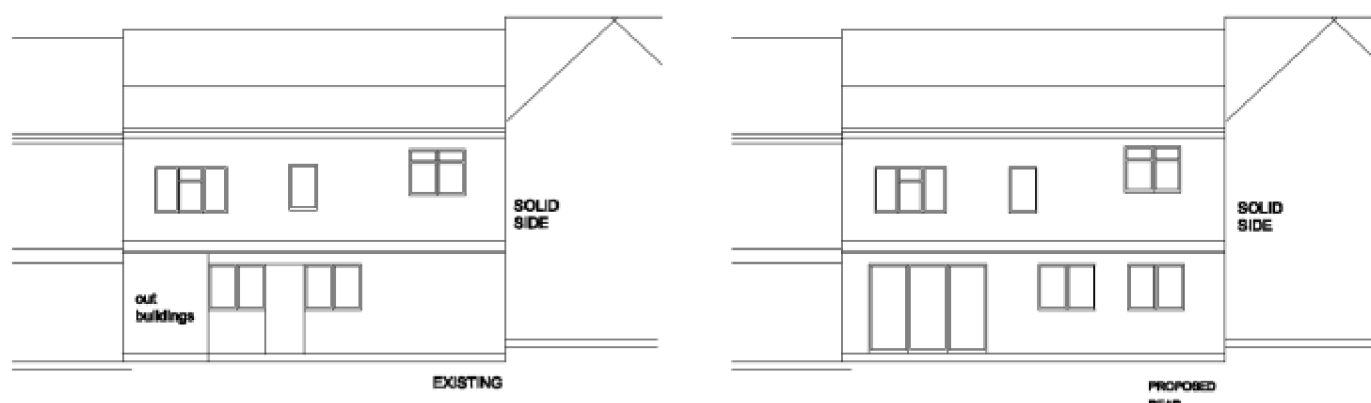
### Existing Ground & First Floor Plans



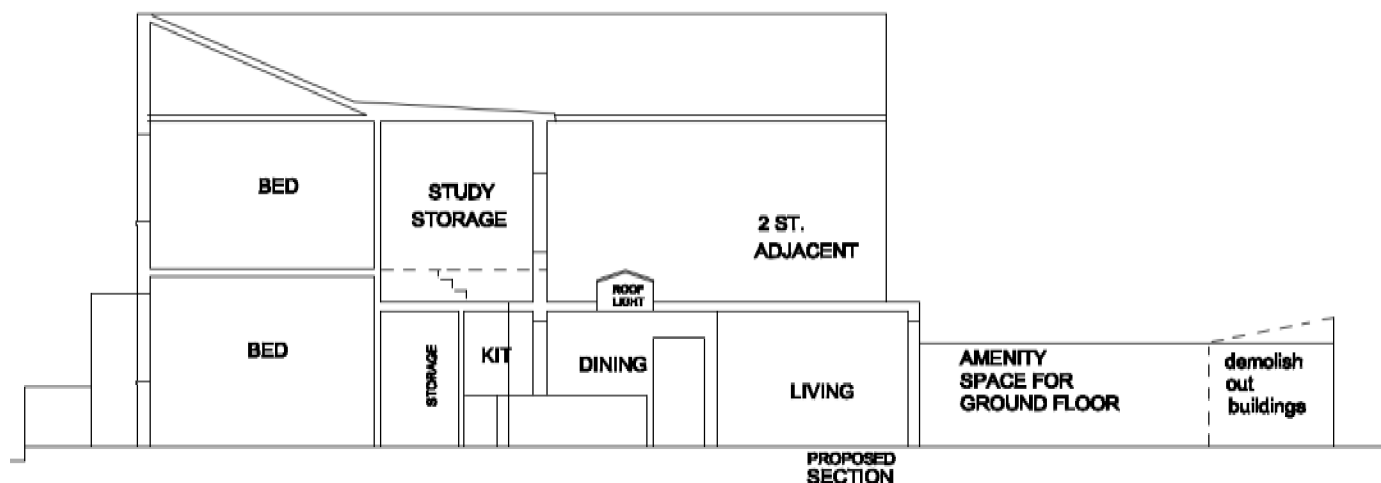
Proposed Ground & First Floor Plans



## Existing & Proposed Rear Elevations



## Proposed Section



The principal issues for consideration are:

- Principle of Development
- Design, Character and Appearance
- Impact on Future Occupiers
- Impact on Neighbouring Amenity
- Parking/Highways
- Ecology and biodiversity

### Principle of Development

The site is in the urban area and Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) states that the strategy prioritises development in the urban area as a sustainable location for development. Policy CS14 states that 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 preamble states that family accommodation is taken to be homes with two or more bedrooms.

No. 125 Wellington Street is a six bedroom, two storey dwelling. Due to the size and number of bedrooms it is considered that the property is not classed as family sized accommodation as it is greater than 2 or 3 bedrooms and as such the proposal is considered compliant with Policy CS14 (LPCS).

Saved Policy H5 of the Gravesham Local Plan First Review (LPFR) states that buildings that it is proposed to convert shall be in an appropriate area for conversion to flats, maisonettes, bedsits and multiple

occupancy; shall be of such a size and arrangement as to be generally unsuitable for single family occupation, shall have regard to the Council's Residential Layout Guidelines and achieve the adopted Vehicle Parking Standards wherever feasible.

The property is in an area where there are other examples of conversion of properties to flats and multiple occupancy. From a search of the planning history for Wellington Street, it can be seen that planning permission has been granted for conversion to flats at the following:

- No. 124 - Conversion of single residential dwelling into 2no. self-contained flats. Permitted 20.12.2022 (ref. 20221144).
- No. 16 - Erection of rear basement extension and conversion of the dwellinghouse basement into a self-contained one bedroomed flat. Permitted 23.12.2020 (ref. 20201104)
- No. 89 - Continued use of property as two self-contained flats. Permitted 21.05.2015.
- No. 133 - Application for Lawful Development Certificate for the existing use of property as three self-contained flats. Granted 02.08.2006 (ref. 20060490).
- No. 154 - Conversion of dwellinghouse into a self-contained bedsit at basement level with a self-contained maisonette over. Permitted 20.06.2006 (ref. 20060339).
- No. 148 - Continued use of the property as two self-contained flats; formation of pitched roof and external staircase to basement level. Permitted 18.11.2010 (ref. 20060185).
- No. 53 - Conversion of dwellinghouse to use as two self-contained flats; and associated alterations and first floor rear extension. Permitted 05.04.2005 (ref. 20050176).
- No. 12 - Conversion of house into a maisonette on ground and first floor and a bedsit on lower ground floor. Permitted 04.10.2004 (ref. 20040734).
- No. 104 - Conversion of existing dwelling into two self-contained two bedroom flats and construction of an external staircase at the side. Permitted 26.07.2004 (ref. 20040441).
- No. 136 - Lawful Development Certificate. Continued use of the property as a self-contained flat with a self-contained maisonette over. Granted 16.10.2003 (ref. 20030740).
- No. 149 - Conversion of the basement into a self-contained flat involving the erection of a two storey rear extension. Permitted 12.11.2003 (ref. 20030722).
- No. 6 - Conversion of dwelling house into self-contained flat with maisonette over incorporating two storey rear extension to form kitchens and a bathroom. Permitted 28.08.1986 (ref. 19860078).
- No. 5 - Conversion of dwelling house into self-contained flat with maisonette over incorporating two storey rear extension to form kitchens and bathrooms. Permitted 28.05.1986 (19860077).
- No. 20 - Conversion of dwelling house into self-contained flat with maisonette over. Permitted 17.10.1983 (ref. 19830613).
- No. 58 Wellington Street - Conversion of dwelling house into self-contained flat with maisonette over incorporating single storey rear extension and provision of car parking at the rear. Permitted 30.01.1984 (19830543).

As can be seen there are a number of cases where single family dwellings in Wellington Street have been sub-divided into flats either through planning permissions or being permitted development.

As such, the proposal for conversion of the property from a single dwelling to two flats is considered acceptable in principle but the proposal would need to be acceptable with regards all other matters including design, character and appearance, amenity of future occupiers, amenity of neighbouring properties, parking and highway safety, ecology and biodiversity, refuse and any other matters.

#### Design, Character and Appearance

There are no extensions proposed to the building, the existing outbuildings and lean-to in the rear garden will be demolished. In the proposal as originally submitted it was proposed to create an external amenity area for the first floor flat on top of the existing single storey rear extension with a 1.7m high privacy screen. This was considered unacceptable in respect of privacy terms to the future occupiers of the proposed ground floor flat and also the neighbouring properties and the agent was therefore asked to remove the amenity space and privacy screen from the drawings which has been done. As such there are no

extensions or external alterations proposed and in respect of design, character and appearance the proposal is considered compliant with Policy CS19 (LPCS).

### Amenity of Future Occupiers

#### *Internal floor area of flats*

The ground floor flat would be a 4 bedroom, 6 person, 1 storey dwelling – the Technical Housing Standards (2015) sets out that the minimum internal floor area for this type of accommodation is 99 sq. m. From measuring the plans this flat would be 113.5 sq. m and would therefore meet the minimum internal floorspace requirement.

The first floor flat would be a 1 bedroom, 2 person, 1 storey dwelling - the Technical Housing Standards (2015) sets out that the minimum internal floor area for this type of accommodation is 50 sq. m. From measuring the plans this flat would be 57.7 sq. m and would therefore meet the minimum internal floorspace requirement.

#### *Bedroom sizes*

The Technical Housing Standards (2015) set out that the minimum internal floor area for a double bedroom is 11.5 sq. m and for a single bedroom it is 7.5 sq. m.

In the ground floor flat there are four bedrooms proposed:

Front left hand side (LHS) double bedroom – 13 sq. m

Rear right hand side (RHS) double bedroom – 13 sq. m

Rear LHS single bedroom – 8 sq. m

Rear RHS single bedroom – 10 sq. m

In the first floor flat there is one (double) bedroom proposed which would be 12.9 sq. m.

As can be seen all of the bedrooms would exceed the minimum standards for single and double bedrooms as set out in the Technical Housing Standards (2015).

#### *Amenity Space*

The ground floor flat would have the rear garden of the building for its external amenity space which would be 61.2 sq. m in area. This would exceed the 10 sq. m minimum private amenity space for flats as set out in SPG2 (2020).

The first floor flat originally had a 10 sq. m external amenity area proposed on top of the single storey rear extension with 1.7m privacy screen but this would have caused an impact of a perception of overlooking to the ground floor flat's amenity space and other neighbouring properties. Given this first floor flat would be a one bedroom unit in this location where there are public amenity spaces nearby such as the Riverside Leisure Area, it is considered acceptable for this flat to not have any external amenity space and the agent was therefore advised to remove the proposed amenity space on top of the single storey rear extension and balcony from the proposal; the agent has submitted revised plans to this effect.

As such it is considered occupiers of the proposed flats would have sufficient access to amenity space.

#### *Light levels*

All habitable rooms would have windows providing natural light and ventilation.

In summary, all of the flats would exceed the minimum internal floor space standard and bedroom sizes, have access to amenity space and would all receive good light levels. The proposal in respect of the amenity of future occupiers is therefore considered compliant with Policy CS19 (LPCS).

### Neighbouring Amenity

As originally submitted the proposed external amenity area which was proposed on top of the existing single storey rear extension area with balcony would have caused a perception of overlooking to the ground floor flat and other neighbouring properties. This was therefore requested to be removed from the proposal and revised drawings have been received showing it removed. As such there would now be no impact on neighbouring amenity and in this respect the proposal is considered compliant with Policy CS19 (LPCS).

### Parking and Highways

The proposal would result in the conversion of a six bedroom dwelling to two flats – a four bedroom flat and a one bedroom flat; the property has no off-street parking. The proposed use of two flats (of four and two bedrooms respectively) would not generate more parking demand than the existing six bedroom dwelling. Furthermore, the site is in an edge of town centre location, where it is considered acceptable for there to be no off-street parking for such residential development of two flats given the close proximity of a number of public car parks. Space for cycle storage is shown in the front garden.

Overall therefore, the proposal would have no impact on parking and highways and in this respect the proposal is considered compliant with Policy CS11 (LPCS) and saved Policy P3 (LPFR).

### Ecology and Biodiversity

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £253.83 per dwelling). This approach is approved by Natural England for all new residential developments.

For every planning application for a new dwelling (including new flats) which does not require any other contributions to be secured through a s106 legal agreement or unilateral undertaking the tariff has been secured through a contribution agreement.

The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However a more recent Court of Justice European Union (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between “the plan or project” itself and “measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

This proposal would result in the net addition of one unit and the applicant has paid the required tariff (£337.49). The Local Planning Authority can therefore be satisfied that the proposal has put in place adequate measures to mitigate potential significant adverse effects on the Thames Estuary and Marshes SPA/Ramsar site.

Therefore, the proposal in respect of ecology and biodiversity is compliant with Policy CS12 (LPCS) and Paragraphs 193 and 194 of the NPPF (2024).

#### Other Matters

**Refuse** - Bin storage is shown in the front garden of the building, which is standard for properties in the street and with two flats at one with four bedrooms and the other with one, it would not create any greater amount of refuse than the existing situation. As such the proposal is considered acceptable in respect of refuse and in regard to this matter the proposal is compliant with Policy CS19 (LPCS).

#### Any Other Material Planning Considerations

**Archaeology** – The site is in an Area of Archaeological Potential however there are no groundworks, therefore the proposal would have no archaeological impact and in this respect the proposal would be compliant with saved Policy TC7 (LPFR).

#### **Conclusion & Recommendation**

The proposal in its revised form is acceptable in relation to principle of development, design, character and appearance, amenity of future occupiers, neighbouring amenity, parking and highways and ecology and biodiversity, refuse and archaeology. It is therefore compliant with local and national planning policy.

**Recommendation:** Permission

(For detailed conditions and informatives, see draft Decision)

|                      |                                                                                     |                     |                                                                                      |
|----------------------|-------------------------------------------------------------------------------------|---------------------|--------------------------------------------------------------------------------------|
| <b>Case Officer:</b> | Ms Rebecca Harrison                                                                 | <b>Team Leader:</b> | Richard Hart                                                                         |
| <b>Signed:</b>       |  | <b>Signed:</b>      |  |
| <b>Dated:</b>        | 27th November 2025                                                                  | <b>Dated:</b>       | 27 <sup>th</sup> November 2025                                                       |