

Planning, Design & Access Statement

*Proposed change of use of existing dwelling into a larger House in
Multiple Occupation (HMO) and associated development*

No. 13 The Grove, Gravesend, Kent, DA12 1DX

May 2022

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1. Introduction

- 1.1 This Planning, Design & Access Statement has been prepared in support of a full planning application submission seeking the proposed change of use of the existing dwelling into a larger House in Multiple Occupation (HMO) and associated development at No. 13 The Grove, Gravesend, Kent, DA12 1DX.
- 1.2 The current proposal includes a HMO including up to 11 bedrooms over 3 floors as depicted by the submitted drawings prepared by Breley Design Ltd.

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2. Site Context

- 2.1 The application site is situated in a central urban location to the south-east of Gravesend town centre within an established residential location.
- 2.2 The site itself is accessed from The Grove off Saddington Street to the north and currently includes one side of a semi-detached pair of properties of a 2-and-a-half storey nature including some lower ground level accommodation. The plot also includes some driveway parking and rear private garden amenity space.
- 2.3 As stated the application site is within the urban area and is also within a location designated as being acceptable for a change of use to offices by Saved Local Plan Policy E5 (Change of Use to Offices).

3. Proposed Development

- 3.1 This Planning, Design & Access Statement has been prepared in support of a full planning application submission seeking the proposed change of use of the existing dwelling into a larger House in Multiple Occupation (HMO) and associated development at No. 13 The Grove, Gravesend, Kent, DA12 1DX.
- 3.2 The proposals relate purely to the existing dwelling's material change of use to a larger HMO and do not include any external alterations to the building in order to facilitate this.
- 3.3 In terms of internal layout and as depicted by the submitted drawings the HMO would include up to 11 bedrooms over 4 floors with associated living and communal space as appropriate. Such layout has also had due regard to the 'Guidance to HMO Amenity Standards' and further details in this respect can be sourced from Breley Design Ltd.
- 3.4 Existing driveway parking and garden amenity space would be retained as existing.

4. History

- 4.1 The application site does have some planning history of relevance to these proposals as is outlined below.
- 4.2 This relates to the submission and approval of a Certificate of Lawfulness application (ref: 20210800) for the proposed installation of a rooflight in the front elevation, erection of a rear dormer and conversion of the roof space to form habitable rooms at no. 13 The Grove.
- 4.3 These works have subsequently been carried out as again depicted by the submitted drawings.

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5. Local and National Planning Policy

- 5.1 The statutory development plan for this area comprises Gravesham Borough Council's Adopted Core Strategy (2014) and the Saved Policies of its Local Plan (First Review) (1994).
- 5.2 Government planning policy is currently set out in the form of NPPF3 (2021) which is an important and significant material consideration in the determination of this planning application.

Adopted Core Strategy (2014)

- 5.3 The most important adopted Core Strategy policies in this instance are considered to include the following:
- Policy CS01 – Sustainable Development;
 - Policy CS02 – Scale & Distribution of Development;
 - Policy CS07 – Economy, Employment and Skills;
 - Policy CS11 – Transport;
 - Policy CS12 – Green Infrastructure;
 - Policy CS14 – Housing Type and Size;
 - Policy CS18 – Climate Change; and
 - Policy CS19 - Development & Design Principles.

Saved Local Plan Policies (First Review) (1994)

- 5.4 The most important Saved Local Plan policies in this instance are considered to include the following:
- Policy T1 – Impact of Development on the Highway Network;
 - Policy P3 – Vehicle Parking Standards;
 - Policy H5 – Increasing Housing Stock by Conversion of existing Buildings; and
 - Policy H6(iii) – Provision to meet Special Housing Needs.

Supplementary Planning Documents (SPDs)

- 5.5 The Council has also adopted the following SPDs of some relevance to these proposals:
- SPG2 - Residential Layout Guidelines (1996);
 - SPG 4 - KCC Parking Standards (2006); and
 - Gravesham Borough Council Guidance to HMO Amenity Standards (2006).

National Planning Policy Framework (NPPF) (July 2021)

- 5.6 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied.

Achieving sustainable development

- 5.7 Section 2 of the NPPF set out, in summary, that the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF details that there are three dimensions to sustainable development which give rise to the need for the planning system to perform a number of roles:
- Economic – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - Social – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - Environmental – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 5.8 The NPPF is clear that these roles should not be undertaken in isolation, because they are mutually dependent. It adds that economic growth can secure higher social and environmental standards with well-designed buildings and places having the ability to improve the lives of people and communities. The NPPF adds that the planning system should play an active role in guiding development to sustainable solutions.

Decision-Making

- 5.9 Section 4 of the NPPF sets out, in summary, that Local planning authorities should:
- Approach decisions on proposed development in a positive and creative way and should use the full range of planning tools available; and
 - Requires LPAs to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area and decision-makers at every level should seek to approve applications for sustainable development where possible.

Delivering a sufficient supply of homes

- 5.10 Section 5 of the NPPF sets out, in summary, that, to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Promoting sustainable transport

- 5.11 Section 9 of the NPPF sets out, in summary, that, transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed, opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised, to promote walking, cycling and public transport use is identified and pursued, the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains, and so that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Making effective use of land

- 5.12 Section 11 of the NPPF makes clear, in summary, that:
- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Achieving well-designed places

- 5.13 Section 12 of the NPPF sets out, in summary, that:
- The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve with good design being a key aspect of sustainable development, creating better places in which to live and work and help make development acceptable to communities;
 - Being clear about design expectations, and how these will be tested, is essential for achieving this as is effective engagement between applicants, communities, local planning authorities and other interests throughout the process;
 - Decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users;

- Where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development; and
- In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Conserving and enhancing the natural environment

- 5.14 Section 15 of the NPPF sets out, in summary, that, to protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them, and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.
- 5.15 It also adds that plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species and identify and pursue opportunities for securing measurable net gains for biodiversity.

6. Planning Assessment

- 6.1 This section considers the key planning issues in the determination of this planning application.

Principle of Development

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 state 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, such a Government Policy or emerging Local Policy.
- 6.3 Firstly, the proximity of the site to the town centre, local amenities and public transport links is likely to deem it as a sustainable location in line with adopted Core Strategy (ACS) Policies CS01 and CS14. This is further considered to be supported by Saved Local Plan (SLP) Policy H6 which also supports in principle, proposals in appropriate locations
- 6.4 Notwithstanding this Saved Policy H6(iii) (LPFR) also sets out that the Council will take particular care to ensure that such proposals do not cluster together and harm the overall character of the area.
- 6.5 The subject dwelling is a large property including 6-bedrooms over 4 floors and as such it is not considered that such proposals would be drastically different to this given the nature and possible intensity of such residential uses. The exterior of the dwelling and site layout would also remain unchanged as depicted by the submitted drawings.
- 6.6 It is also considered unlikely that such proposals would give rise to a clustering effect which could unduly harm the overall character of the area given this and the nature and mixed context of this residential locality with varying building forms and styles. The character of the area is domestic and the proposed change of use is not considered likely to erode the domestic character of this area. As such it is considered that the proposal is in full compliance with SLP Policy H6(iii).
- 6.7 The proposed development is therefore considered to be acceptable in principle as supported by the relevant provisions of the Local Development Plan and the NPPF.

Design & Layout

- 6.8 Given that this proposal relates solely to the material change of use of the subject dwelling to a larger HMO with no external alterations the existing site context and layout would remain unchanged. As such these proposals would have no physical impact or result in any changes to the existing character of the dwelling and site. As such it is considered that this would comply with the requirements of ACS policy CS19 and SLP policy H5 as well as the

relevant provisions of the NPPF in respect of the impact of the proposals on the character and visual amenity of the locality.

Amenity Considerations

- 6.9 As part of the evolution of these conversion proposals the architect has had due regard to the Council's adopted Guidance to HMO Amenity Standards SPD (2006) and as such it is considered that these proposals are in full compliance with this guidance. This includes in respect of room sizes and associated internal amenities for future occupiers.
- 6.10 It is also important to note that these standards can be achieved without the need for physical alteration to the existing dwelling as again depicted by the submitted drawings.
- 6.11 Although this guidance does not contain information of external amenity areas it is considered that the site's existing rear private amenity area would be sufficient for such a nature and scale of residential development as a larger HMO.
- 6.12 Therefore, given the above including the nature and scale of these proposals it is considered that such development would provide a good standard of amenity for future occupiers as well as safeguard existing amenity considerations in line with the requirements of ACS policy CS19 and the relevant provisions of the NPPF.

Highways & Parking

- 6.13 The proposals would retain existing driveway space for 2 cars, however these would unlikely be available for future occupiers. Notwithstanding this, given the nature of these proposals and the site's level of accessibility including to Gravesend town centre it is considered that such provision is acceptable in this instance. This includes good accessibility to local bus and train routes associated to the nearby town centre meaning that the site is within a highly sustainable location appropriate for such nature and scale of proposed use.
- 6.14 In addition cycle storage provision will be proposed and secured by condition if deemed reasonable.
- 6.15 Therefore, such proposals are considered to be full acceptable in this respect in line with the requirements of ACS policy CS11 and SLP policy P3 as well as the relevant provisions of the NPPF.

Ecology

- 6.16 The application site is understood to be within the Thames Estuary and Marshes Ramsar Buffer Zone.
- 6.17 The existing use is a 6-bedroom dwelling with the proposal relating to an 11-bed HMO. As such there would be no net increase in residential units as a result of this proposal and

therefore mitigating measures in the form of a tariff payment is not understood to be required in this instance. This will be confirmed with officers during the planning application process.

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7. Conclusion

- 7.1 This full planning application submission seeks approval for the proposed change of use of the existing dwelling into a larger House in Multiple Occupation (HMO) and associated development at No. 13 The Grove, Gravesend, Kent, DA12 1DX.
- 7.2 As set out above these proposals are considered to be acceptable in all relevant planning-related respects including in relation to matters of principle, design and layout, amenity (existing and proposed) and highways.
- 7.3 These proposals are therefore considered to constitute sustainable development in line with the relevant provisions of the adopted Local Development Plan and the NPPF.