



Planning, Heritage, Design, and Access Statement

project:



Proposed conversion of existing residential floor space on the first and second floors into a self-contained four room House of Multi Occupancy (HMO) including ground floor rear

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sitting room and separate HMO rear access.
(Ground and basement commercial floor areas to remain)

Location

38 Windmill Street
Gravesend
Kent
DA11 0QF

date:

April 2025

authority:

Gravesham Borough Council

a principle:

1. The purpose of the proposed works is a change of use from a combined residential and commercial premises to a house of residential multi occupancy (HMO) on the first and second floors only, which has existing residential use. This includes a new separate access to the rear at the ground floor level for HMO users only, dividing them from the existing commercial users on the ground and basement floors, by utilising the existing central stairs. This division would allow each separate class use to have their own access and egress points.
2. The plans show the commercial spaces as self-contained offices at ground and basement levels utilising the existing entrance/exit doors to the front elevation. The layouts are indicative only as to how the commercial space will be marketed and altered from the specialist sui generis use of a former funeral directors. Marketing for a commercial tenant has hitherto been unsuccessful due to the existing presenting such specialist use, requiring alteration and refurbishment. The proposed layout is to promote how the existing floor space could be used as required by present policy CS05(LPCS) as the site is located in Sub-Area 3.3 South of the Town Centre. The commercial



spaces have been fully annotated as to their former precise use in the past and the proposed changes would be subject to an appropriate planning application and listed building consent should tenants be found in the future.

3. The scope of works are mainly internal upgrading standards for building regulation approval in terms of fire escape, fire warning, fire resistance, ventilation, noise mitigation and insulation. All required for the proposed HMO use.
4. There is one small area at the lower ground level floor that was formally used as a body reception area. It is proposed that this area becomes a sitting room for the HMO residents with its own additional toilet located conveniently at the HMO entrance as it does not relate to the existing commercial floor space except through cellar flaps to the basement level which was particular to the previous use.
5. The host building is grade two listed. As such all the remaining original features need to be retained, restored and/or made good both inside and out.
6. It can be seen that three planning applications have been submitted in 2023 for the conversion of the building into residential flat accommodation. All three applications have been refused. Turning to last of these applications (the previous two being similar in nature) 20230897, the main issue is that there was no detail in the application as to how the works would need conform with modern standards, building regulations, the potential noise levels from traffic with a need for MVHR ventilation and that the building is sited within an Air Quality Management Area (AQMA) as well as also being within the Upper Windmill Street Conservation Area (UWSCA). It was also refused based upon Policy CS05 the unacceptable loss of commercial floor space.
7. Following the refusal of 20230897 and 20230400 the issues of concern are very clear. This revised proposal



will attempt to show in detail how the works proposed have positively addressed the previous concerns and that there is no detrimental impact upon the existing fabric of the building as well as the remaining original features.

8. Included in this application is supplementary information that was included in previous applications 20230897 and 20230400 which are still relevant to this new application is respect of an Air Quality Assessment and Noise Impact Assessment.
9. Noise Impact Assessment (NIA)- It has been recommended in the report that secondary glazing would be the best way of providing required adequate sound insulation to windows in a listed building. A specification in 6.1.8 has be included. The specification will be adopted for the proposed new secondary to all habitable rooms in the locations shown on the accompanying plans. It is accepted that the detail of the specification with scale drawings will be required, to confirm the scope of works and be a condition attached to any consent requiring discharge by writing.
10. Air Quality Assessment (AQA)- Based upon the report it is intended introduce a ducted MVHR systems to all habitable rooms. The systems will include a heat exchange unit, noise attenuation, incorporate air intake and exhaust through the roof and sited away from any other pollution sources. Windows in habitable will not have trickle vents, with positive pressures in habitable rooms.
11. An MVHR ventilation scheme is now included as further supplementary information, designed by Rega Ventilation Ltd. The system will deal with the separate issue of kitchen extract eliminating any pollution potential for residents. The MVHR stem will also eliminate the need for separate exterior ventilation grilles
12. It is accepted that the site falls within Thames Estuary



and Marshes Special Protection Area and as such with require a SAMMS tariff to be paid. Should any consent be issued, it would be accepted that a condition would be added to ensure the application pays the appropriate tariff based on the net addition residential units. In this case three units at £328.27 a total of £984.8.

b amount:

1. The proposal seeks to provide four separate bedrooms with a communal bathroom/toilet, additional toilet, cycle store, two ensuite bathrooms, dining room, sitting room and external letter box. Two of the bedrooms have ensuite facilities so the existing bathroom would be shared be used by two rooms.
2. There is a 1000mm wide right of way access to the rear over adjacent land not owned by the applicant which will be used by HMO residents only for access and egress.

c layout:

1. All the proposed accommodation fits within the original pattern of rooms with no structural work required respecting the existing fabric of the building and important features that remain.
2. From the GBC, HMO Amenity Standards (2023) the proposed accommodation compares as follows:
 - Minimum bedroom floor area required 6.51 sqm. HMO bedroom 1, 7.56 sqm, bedroom 2, 7.33 sqm, bedroom 3, 9.00 sqm and bedroom 4, 19.52 sqm. Therefore, the bedroom floor areas comply.
 - The standard for bathroom and toilet facilities are met with one shared bath, wash hand basin and WC, plus two ensuites and additional toilet on the lower ground floor.
 - Minimum kitchen floor area required is 6.00 sqm with 6.88 sqm provided which complies.
 - Dining area required at 2.00 sqm per person therefore 8.00 sqm required with 9.00 provided.
 - Living room requires a minimum of 13.00 sqm for three persons plus 1.00 sqm per for each extra



therefore 14.00 sqm required for this case. Living room provided is 14.08 sqm and complies with the minimum standard.

d setting:

1. The existing building has three storeys above ground and a basement level which is half height underground. The levels to the rear step down for the front level forming a small lower ground level.
2. There is a rear original two storey extension with access from half landing now with a pebble dash finish to the external walls.
3. In addition, there is a matching single side extension matching the original which is has smooth coat render in a buff colour matching rendered band course, window and door case detail.
4. The main building is of stock brick construction under a slope slate roof and is the end of a terrace at the corner of Lord Street and windmill Street opposite the Council offices.

e
appearance:

1. The proposed works are mainly internal. To the rear proposed at the lower ground floor level it is proposed to add a new HMO entrance/exit door and a window in lieu of some existing timber boarded double doors. With access via an existing right of way. The window will be single glazed incorporating secondary glazing to match the existing.
2. There are very few original features within the existing building with the internal staircase and external stone steps being the main features remaining. The scheme includes the refurbishment and repair of both features. There are some original fireplaces and cupboards all of which are proposed to remain. Details of the existing is shown on the accompanying drawings 1124.WD.102 to 109 inclusive on a room by room basis together with a description of the proposed refurbishment works. The

**CONCLUSION:**

existing white painted timber sash widows will still remain as they are in good condition. It is intended to repair and restore the windows. Secondary glazing will then be introduced internally to match the sash openings and window configuration. This will also be part of the noise mitigation strategy as they will be based upon the specification contained in NIA.

1. The previous applications 20240813 and 20240814 turned were refused based upon the issues as follows:
 - a. The proposal was contrary to policy CS05 as it proposed a change of use to HMO for the existing commercial use on the ground and basement floors. This now not proposed with the commercial spaces retained and to be marketed in a different way to attract tenants, which hitherto have not been forthcoming. There is one small unrelated section of commercial floor space at rear forming the lower ground section that is proposed to be used for an HMO sitting room. This space now relates to the proposed HMO use and would be unrelated to the proposed commercial use alterations at is on a different floor level. Being a small proportion of the commercial area, which remains largely intact the aspirations of Policy CS05 are not compromised and should not be a reason for refusal.
 - b. The accommodation previously fell short of the GBC Guidance for HMO Amenity Standards (2023). This statement confirms that the standards are now met and should not be reason for refusal.
 - c. Sonair ventilation and the external grilles have now been superseded and do not pose a reason for refusal.
 - d. The proposed Rega Ventilation MVHR systems provides all the detail required to assess its suitability in a listed building. It is therefore hoped that ventilation details are now



satisfactory. Details could be further scrutinised by condition to discharge in writing if necessary.

- e. Double glazing specification has now been confirmed to the recommendation of the NIA. It is also confirmed that a condition will be acceptable to discharge in writing scale drawings showing the type and fixings for the secondary glazing proposed.
 - f. It is accepted that a SAMMS tariff will apply and payment made to discharge a condition in that respect.
 - g. It is further accepted that a condition would be forthcoming in respect of the details for refuse storage.
2. As the foregoing addresses all the issues referred to in the previous refusals under ref: 20230897 and 20230400 the weight of the foregoing further considerations would now allow planning consent to be issued.