



Delegated Report

Planning Application

Application No:	20250178
Location:	84 Parrock Street, Gravesend, Kent, DA12 1HF
Description:	Change of use from an HMO to two self contained flats.
Applicant:	Mr Clifford Dawe
Site Visit:	N/A Desktop Assessment

Positive and Proactive Decision Making

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 39 of the National Planning Policy Framework (NPPF) (2024), the Local Planning Authority has approached the assessment and determination of this application in a positive and creative way and has worked pro-actively with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area.

The Local Planning Authority contacted the agent regarding concerns with future occupier amenity, based on undersized rooms, habitable rooms not receiving natural light and the internal layout. It was considered that minor amendments could address these issues, by removing some rooms and rejigging the layout.

The revised plans were received and were in accordance with local and national living standards.

Submitted Documents/Plans

- Application Form – dated 28 February 2025;
- Design and Access Statement;
- Heritage Statement;
- Drawing no. PS/10 – Existing Basement Floor Plan;
- Drawing no. PS/11 – Existing Ground Floor Plan;
- Drawing no. PS/12 – Existing First Floor Plan;
- Drawing no. PS/13 – Existing Second Floor Plan;
- Drawing no. PS/14A – Proposed Basement Floor Plan;
- Drawing no. PS/15A – Proposed Ground Floor Plan;
- Drawing no. PS/16A – Proposed First Floor Plan;
- Drawing no. PS/17A – Proposed Second Floor Plan;
- Drawing no. PS/18 – Site Location Plan (scale – 1:1250);
- Drawing no. PS/19 – Existing and Proposed Block Plans (scale – 1:500).

Relevant Planning History

Reference	Description	Decision	Decision Date
19950162	Use of premises for a residential home for persons with mild learning difficulties.	PERMITTED	04.05.1995

19950377	Application for the approval of a revised car parking area and its surfacing; the extent of the garden area in relation to the dwelling and parking area; trees to be retained or removed and landscaping details as required by conditions (ii), (iii), (vi) & (viii) of p.p. ref. GR/95/162.	APPROVAL OF DETAILS	13.07.1995
19890616	Conversion of property into 4 no. self-contained flats incorporating the erection of a four storey rear extension to form bedroom at basement level with kitchens and bathrooms at ground, 1st and 2nd floor levels and laying out of 4 no. car parking spaces at the rear.	REFUSAL	07.09.1989

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS14 – Housing Type & Size
- CS15 – Housing Density
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage & the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas

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 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic 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)

- Gravesend Town Centre Conservation Areas Management Plan (2009)
- Windmill Hill Conservation Area Appraisal (2007)

Consultations, Publicity and Representations

Internal Consultees

Conservation Officer – No comment received.

Local Ward Councillor – No comment received.

Neighbouring properties

A notice was displayed on site 11 March 2025.

In addition, eighteen surrounding properties were consulted and no representations were received. The consultation period expired 16 April 2025.

Officer's Analysis

Site Description

The site is within the urban boundary of Gravesend which is covered by Policy CS02 (LPCS) which supports the principle of residential development within the urban area of Gravesend and rural settlements inset from the Green Belt. Policy CS14 (LPCS) at 5.10.9 states that the Council will expect new housing to provide a range of dwelling types and sizes which take into account the existing character of the area and Policy CS15 (LPCS) at paragraph 5.11.7 states that the development should have regard to the character and location of the area.

The application site comprises a four storey dwelling, which is located on the west side of Parrock Street to near the junction with Wellington Street.

Principle of the Development

The principle considerations for this proposal are:

- Housing Need
- Density of Development
- Design and Impact on the Conservation Area
- Amenity of Future Occupiers
- Neighbouring Amenity
- Highways and Parking
- Any Other Material Planning Considerations

Proposed Development

This application proposes the conversion of the seven bedroom HMO into two self-contained flats. The flats would be two and three bedroom units.

The two bedroom unit would be located on the ground and basement floor levels, and the three bedroom unit on the first and second floors.

Design, Character and Impact on the Conservation Area

This application will not change the Design, Character or Appearance of the property. Therefore, the development would not impact the Windmill Hill Conservation Area and is in accordance with Policies CS19

and CS20 (LPCS), as well as Sections 12 and 16 of the NPPF (2024).

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be ‘fit for purpose’ and be ‘adaptable to allow changes to meet the need of users’ and that ‘the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines’ (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

The flats within the proposal are a mixed in terms of size. The national housing standard guidance provides minimum gross floor areas for single storey dwellings, breaking down the number of bedrooms and bed spaces (persons). The proposed flats have been compared to the NDSS in the table below:

Flat no.	Bedroom(s) /Person(s)	National Housing Standard Guidance	Unit Floor space
1	2 (4 person)	79m ²	99.6m ²
2	3 (4 person)	84m ²	104.8m ²

Table 1 - Unit Floor Area Breakdown (GIA)

As shown in Table 1, if the flats are assessed at maximum capacity and all units comply with the recommendations within the National Space Standards. Therefore, it is suggested that the units would provide acceptable accommodation and safeguard the amenity of future occupiers.

Notwithstanding the National Space Standards, Gravesham’s RLG breaks down the Council’s individual requirements for certain rooms, these have been formulated into a table to compare with the floor area of rooms within the proposed flats.

	Gravesham RLG (2020)	Flat 1	Flat 2
Living Room	13.2m ²	16m ²	14.7m ²
Kitchen	7.2m ²	9m ²	7.9m ²
Dining Room	9.5m ²	12.3m ²	12.6m ²
Bedroom (double)	11.5m ²	14.7m ²	13.9m ²
Bedroom (single)	7.5m ²	10.8m ²	11.2m ² 10.9m ²
Bathroom & w.c.	3.5m ²	4.9m ²	5m ² 4m ²

Table 2 - Flat Floor Area Breakdown

Table 2 has been colour coded to show which rooms within each flat meet the guidance within the RLG. The table demonstrates that all rooms within the proposed flats comply with the RLG and that future

occupiers would benefit from a good quality living environment.

The future occupiers of Flat 1 (ground floor and basement) would have direct access to the garden area. The occupiers of Flat 2 would not have direct internal access, however this is not required due to proximity to Windmill Hill open space.

Overall, the proposed conversion would provide a good quality living environment for future occupiers in line with the NDSS (2015) and Gravesham RLG (2020), as well as Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and the NPPF (2024) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The proposed conversion of the HMO into single family flats does not involve any extension or alteration to the property that would cause impact on neighbouring amenity. Moreover, the change to single family occupancy is likely to generate less noise and disturbance than a seven bedroom HMO to the benefit of amenity.

Therefore, the development would safeguard amenity in accordance with Policy CS19 (LPSC) and Section 12 of the NPPF (2024).

Parking and Highways

The site is in a central location in the town where public transport links are good and there are sufficient parking restrictions in the locality and public car parks available nearby. There are two spaces available to the rear of the curtilage, however these are existing and the Council is prepared to accept no additional off-street parking provision.

Nevertheless, the development should provide cycle storage spaces within the rear garden, to accord with guidance in Kent County Councils parking standards SPG4 (2006). A condition will be attached to ensure that details of secure cycle storage are submitted and approved in writing prior to first occupation.

Subject to conditions, the proposal accords with local and national highway policy.

Any Other Material Planning Considerations

Waste Management

The provision of suitable arrangements for waste storage required by Policy CS19 (LPCS) and the plans do not detail the location or size of the waste storage. It is acknowledged that the existing bins are kept open to the front of the property, however a condition will be attached to ensure that details of the bin store are submitted to and approved in writing prior to first occupation of the development.

Subject to condition, the proposal accords with Policy CS19 (LPCS).

Ecology and Biodiversity (Bird Mitigation)

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering waterbirds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes)

and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £337.49 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £337.49 per new unit.

The applicant has paid the SAMMS Mitigation Contribution Agreement and therefore meets the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 190 and 191) of the NPPF (2024) and Policy CS12 (LPCS) (2014).

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

The conversion from a HMO into flats of single family occupancy would involve no external changes to the property and would preserve the character and appearance of the Windmill Hill Conservation Area. The flats would safeguard amenity of future occupiers and neighbouring residents, as well as the Thames Estuary SPA. Subject to condition relating to cycle parking and bin storage, the proposal complies with highway and waste policy subject to conditions.

Therefore it is recommended that permission is granted, subject to conditions.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	10 th July 2025	Dated:	10 th June 2025