

17 August 2026



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Dear Sir / Madam,

APPLICATION FOR PLANNING PERMISSION TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) TOWN AND COUNTRY PLANNING ACT 1990 AT 44-46 THE GROVE, GRAVESEND, KENT, DA12 1DF

We are instructed on behalf of our client, Substantia Capital, to submit a full planning application in respect of proposals for 44-46 The Grove, Gravesend, Kent, DA12 1DF.

The description of development for the full-planning application is as follows:

“Infill and conversion of lower ground floor to provide five residential units and associated works including to car parking, cycle parking and refuse storage at ground and lower ground floor”.

The application has been submitted electronically over the Planning Portal (PP-15147354) and is comprised of the following information:

- This Cover Letter (Savills)
- Completed Application Form (Savills);
- Design and Access Statement (Hillman);
- Contamination Report (Lustre);
- Daylight and Sunlight Assessment (Ecolytik);
- Noise Impact Assessment (KP Acoustics);
- Transport Statement (Evoke Transport);
- Site Location Plan (Hollaway Studio); and
- Drawings, prepared by Hillman, as follows:

Drawing Reference	Drawing Title	Scale
100.001	Site Location Plan	1:1250 @A3
250425-051 Rev P1	Existing Basement Plan	1:100 @A1
250425-052 Rev P1	Existing Ground and First Floor Plans	1:100 @A1
250425-053 Rev P1	Existing Second and Third Floor Plans	1:100 @A1
250425-054 Rev P1	Existing Elevations	1:100 @A1
250425-061 Rev P2	Proposed Basement Plan	1:100 @A1
250425-062 Rev P1	Proposed Ground and First Floor Plans	1:100 @A1
250425-063 Rev P1	Proposed Second and Third Floor Plans	1:100 @A1
250425-064 Rev P1	Proposed Elevations	1:100 @A1

1. Site Description and Context

The application site is located in central Gravesend and comprises a broadly T-shaped parcel of land which to the front provides pedestrian access from The Grove and to the rear, vehicular access from Edwin Street. The site comprises of a part 4, part 5 storey residential building which lies to the west side of The Grove, approximately 60m to the south of the junction with Milton Road.

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The site has historically been in lawful Use Class E, having been in use historically as a job centre and offices, as confirmed in respect of the site’s planning history (ref: 20210256 & 20210291). Prior approval was first granted under application 20240942 on 9 December 2024 for the change of use of the existing building from office use (Class E) to 37 residential units (Class C3) under Part 3, Schedule 2, Class MA of the General Permitted Development (England) Order 2015 (GDPO). Prior approval was granted on a second occasion under application reference 20251201 on 12th January 2026, which was re-submitted for changes to the layout of the residential units to optimise the layouts within the existing building.

At the time of writing this letter, the building has been converted to residential use following the grant of prior approval under ref: 20251201. The approved scheme is built and has been completed in accordance with the details provided, including in accordance with Condition 1 of the prior approval decision. Noting the works to change the use of the building has now complete, it is considered that the Class MA consent has been implemented and the building is now in lawful use as Class C3.

The part of the building subject to the submitted planning application is the lower ground floor to make more effective and efficient use of areas previously used for car parking and cycle parking. The application does not propose any changes to the upper floors of the building.

The site is located within walking distance of a range of services and amenities found within Gravesend Town Centre. The site is located approximately 500m east of Gravesend Railway Station and is within walking distance of numerous bus stops, providing transport connections in the area.

The site is not statutorily or locally listed, and not within a conservation area. The site is located within Flood Zone 1 and therefore considered at low risk of flooding.

2. The Proposed Development

The proposed development comprises the conversion and alteration of the lower ground floor of the building to provide five residential units which comprises 4 x studio flats and 1 x one-bedroom flat. Private outdoor amenity space is integrated through the provision of private rear gardens / courtyards.

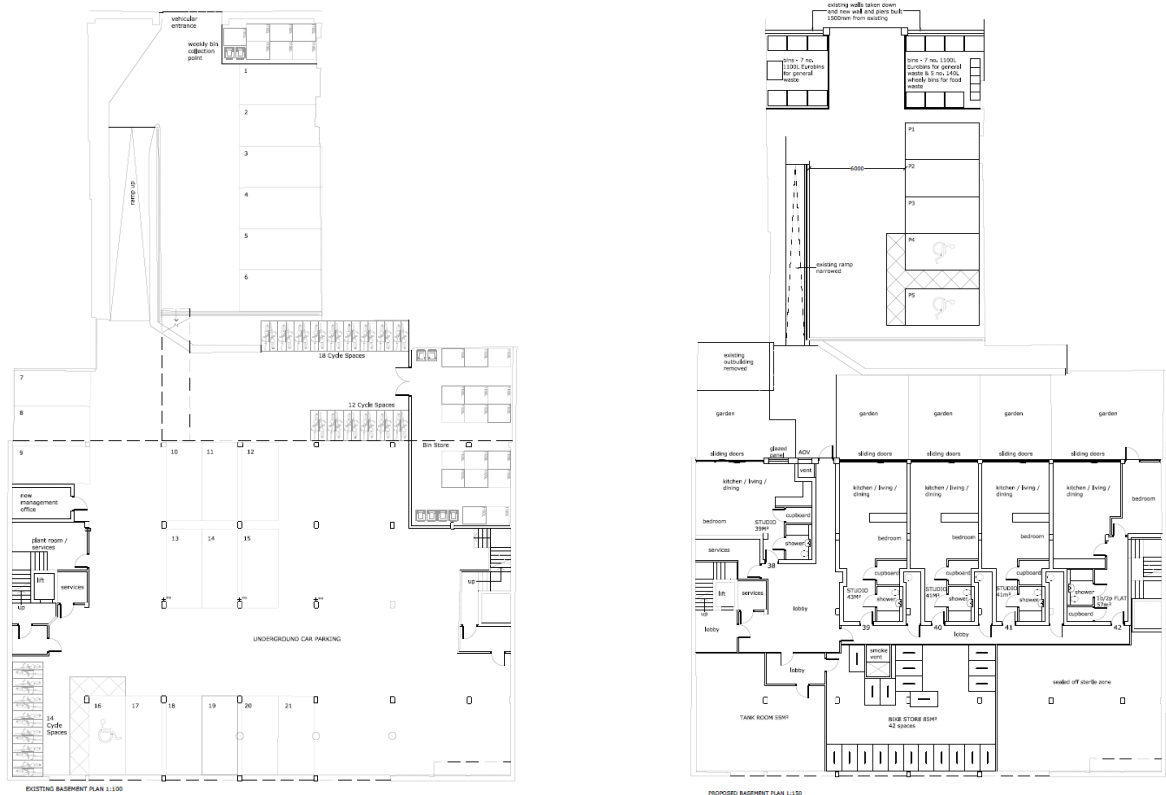


Figure 1 – Existing and Proposed Lower Ground Floor Plans (Hillman, 2026).

The application also alters and reconfigures the provision of cycle parking and waste storage facilities which are provided at ground and lower ground floor level, providing appropriate provision for the residential units proposed within this application, as well as the 37 units within the existing building on the upper floors.

3. Planning Policy

Planning law requires that where regard is to be had to the development plan for the purpose of any determination made under the Planning Acts, the determination must be made in accordance with the development plan unless material considerations indicate otherwise¹. The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map (September 2014);
- Saved policies in the Gravesham Local Plan First Review (November 1994); and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

Gravesham Borough Council are currently in the process of reviewing its Local Plan to address the borough's development needs up to 2037. The Gravesham Local Development Scheme (published in March 2025) sets out timescales for the preparation and submission of the emerging Local Plan. The Local Plan is currently at Regulation 19 stage and is under consultation which opened on 17th April 2026 and closes 18th August 2026.

The Local Plan is supported by the Policies Map, as shown in Figure 2, which demonstrates that the site is subject to the following designations:

- Site located in Gravesham Town Centre
- Situated within an Opportunity Area (CS03-CS06)
- Adjacent to boundary for Crossrail Safeguarding (CS11)
- Located in a region where change of use to Offices is deemed acceptable (E5)



Figure 2 – Policies Map (September 2014)

4. Planning Assessment

Principle of Development

Policy CS02 of the Core Strategy (2014) sets out that the plan will prioritise development in the urban area as a sustainable location for development. Paragraph 124 of the National Planning Policy Framework (NPPF) states that planning decisions should promote the 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. In addition, Paragraph 125 (d) of the NPPF states that planning decisions should support opportunities and promote the development of under-utilised land and buildings, especially if this would meet identified need for housing. It is considered that the proposed basement infill and conversion would prioritise housing delivery to the urban area

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004

and make effective use of land and airspace for meeting the needs of homes.

Paragraph 78 of the NPPF requires local planning authorities to add an additional 5% buffer to their housing need figure over the five-year period to ensure choice and competition in the market for land. Paragraph 78 of sets out for local authorities where there has been significant under-delivery in the last 3 years, this buffer is to be increased to 20% to improve the prospect of achieving the planned supply. The Five-Year Land Supply Statement 2025-2030 (July 2026) sets out that against a need of 1,789 dwellings, 1,056 dwellings were delivered in the Borough which results in a Housing Delivery Test 2023 measurement of 59%. In addition, the Statement confirms Gravesham Borough Council have a 2.53 year housing land supply. As a result of failing the housing delivery test and a lack of a five year housing land supply, a 20% buffer is applied to Gravesham's housing need figure, and the presumption in favour of sustainable development is engaged. This presumption in favour of development further supports the principle of delivering residential accommodation on the site.

As the site is located in the urban area, an opportunity area and located close to public transport and Gravesend Town Centre, it is considered that there the principle for residential use accommodated within the lower ground floor of a building in already converted to residential use to make more effective use of the building through its reconfiguration is considered acceptable in policy terms, aligning with Policy CS02 of the Core Strategy and Paragraphs 125 of the NPPF.

Unit Mix

In regard to unit mix, Policy CS14 requires development to offer a range of dwelling sizes. The proposed development will provide five residential units comprising of 4 x studio and 1 x one-bedroom units. This seeks to deliver homes aimed at meeting the housing needs for individuals looking to purchase their first home within the Town Centre, close to public transport and employment opportunities, aligning with Policy CS14 of the Core Strategy.

Design

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The proposed development seeks to infill the lower ground floor of the existing building.. The lower ground floor currently comprises an open-sided undercroft car park and ancillary residential area; and the proposed scheme seeks to provide an five residential units. The proposals will result in a new external wall being installed flush with the existing rear elevation. This will comprise of glazing and materials to match the existing building, maximizing daylight to the residential units and creating a consistent rear elevation in terms of appearance and materiality. All units will benefit from rear garden areas, further enhancing the quality of accommodation.

A Design and Access Statement, prepared by Hillman, accompanies this letter and provides full details of the proposed design. This letter should be read alongside the submitted Design and Access Statement.

In line with Policy CS19 of the Core Strategy, the design of the proposed development has been carefully designed to make efficient use of a sustainable site for housing, while safeguard amenity such as privacy, daylight/sunlight and avoid adverse impacts arising from factors such as pollution, noise, contamination and odour.

Heritage

Policy CS20 states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place.

The site is close to the Harmer Street Conservation Area to the north and the King Street Conservation area to the north and west.

It is considered that the proposed development would be appropriate in the setting of the Conservation Area and would have a negligible impact due to its siting at lower ground floor level. Therefore, the proposals will have no impact on the Conservation Area due to lack of direct views of the proposals from the Conservation Area. It is considered therefore that the proposed development accords with Policy CS20.

Residential Amenity

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users (Paragraph 135 (f)). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy (2014), which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

Noting the location of the proposed units at lower ground floor level and no additional built form proposed as part of the development, it is considered that the proposed development would not give rise to any adverse impacts on neighbouring properties or land in respect to the amenity, privacy and daylight sunlight.

The proposed units will meet the nationally described space standards and benefit from generously sized windows to provide high-quality residential accommodation. In regard to private outdoor amenity space, SPG2 Residential layout guidelines (2020) sets out that for self-contained units which have two or more bedrooms and are capable of providing family accommodation, an area of amenity space in excess of 10 sq. metres will be expected. There is no guidance requiring amenity space provision for one bedroom units. The proposed development integrates private amenity space for each residential unit in the form of private rear gardens which are between 25 - 41 sq.m in size. The provision of private amenity space is in surplus to local guidance, as such it is considered that the private amenity space provision is a significant benefit of the scheme and fully acceptable in the context of the proposed development.

A Daylight Sunlight Assessment, prepared by Ecolytik, accompanies this letter and sets out that all units will benefit from acceptable levels of daylight. Results contained in the Assessment highlight all habitable rooms achieve acceptable levels of daylight and sunlight, as required under BRE criteria. Based on the findings, it can be concluded that the proposed scheme will provide satisfactory levels of daylight and sunlight to future residents and their homes when the existing constraints to the site are considered.

A Noise Impact Assessment, prepared by KP Acoustics, also accompanies this application and the assessment demonstrates that the proposed units can achieve the BS 8233:2014 internal noise criteria subject to:

- Glazing meeting the minimum octave-band performance specified in Table 5.2;
- Trickle ventilators achieving the minimum performance specified in Table 6.2, where proposed; and
- Mechanical ventilation systems being designed to satisfy applicable internal noise criteria.

Subject to the recommendations of the Assessment, the proposed development is considered acoustically suitable for residential use.

Based on the findings of the accompanying Assessments and for the reasons set out above, it is considered that the proposed development is located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants in accordance with Policy CS19.

Transport and Highways

The maximum vehicle and minimum cycle parking standards for residential developments within Gravesham are outlined in the Kent County Council SPG4 Parking Standards Guidance (2006).

The building is currently accessed by vehicle via an existing access road off Edwin Street to the rear of the property. This vehicular entrance will be maintained following the conversion of the lower ground floor of the building ensuring that the site will be accessed safely in line with the existing arrangements.

A Transport Note, prepared by Evoke Transport, accompanies this. The application proposes to reconfigure the lower ground floor resulting in the loss of an area of car parking and ancillary residential areas. The application proposes the retention and provision of five parking spaces, including two accessible spaces, which

will be available to serve the building. The five new residential units subject to this application are proposed to be car-free and it is not envisaged they will require any car parking. Whilst there is a loss in car parking overall, the provision is considered to be acceptable given the highly sustainable location of the site and is justified within the submitted Transport Statement.

As outlined above in this letter, the site is located in a sustainable urban location in close proximity to Gravesend Town Centre, accessible to a range of facilities by non-motorised modes transport within 500m of Gravesend Railway Station. Furthermore, bus stops are located within easy reach of the site providing connections to Dartford, Sevenoaks, Chatham, Bluewater amongst other locations. Noting this context, the proposed car free nature of this scheme specifically is considered suitable for the proposed development quantum.

The Kent County Council SPG4 Parking Standards Guidance (2006) state that one cycle parking space per unit should be provided for flats. A total of 44 cycle parking spaces are currently proposed at lower ground floor level with 22 Sheffield Stands (44 spaces) provided to deliver an overall quantum for the five proposed new units subject to this application, as well as the 37 existing units on site. The cycle parking is accessible via the ramp to the rear off Edwin Street or via the lifts. All cycle parking is secure, sheltered and safely accessible. As part of this cycling strategy, the proposal seek to enhance the implemented lower ground floor level cycle parking area to provide a designated, secure and sheltered cycle parking room at basement level. All spaces are provided as Sheffield stands, ensuring ease of use by all residents.

Refuse and recycling stores are proposed at ground floor level, which are reconfigured as part of this application, but maintain an acceptable provision for the five new residential units, as well as the existing 37 residential units.

In accordance with Paragraph 109 of the NPPF the site offers a genuine choice of transport modes including more sustainable modes of transport such as cycling through the provision of secure and sheltered cycle parking.

Contamination

In accordance with Policy CS19 in Gravesham Council's Core Strategy, a Phase 1 Desk Based Contamination Study has been undertaken by Lustre to support this application to avoid and mitigate adverse environmental impacts from land contamination. In summary has identified a number of potential contaminant linkages. No confirmed unacceptable risk has been demonstrated by the available desk-study information. However, because residential accommodation is proposed within the existing undercroft/lower-ground level, potentially unacceptable risks from ground gas and vapour ingress cannot currently be ruled out at this stage. Contamination from onsite sources is anticipated to be minor and associated with historical residential and commercial uses. Although risks are considered a low, the proposed residential apartments and rooms on the lower ground floor are considered particularly sensitive to ground gas and vapour ingress. As such, and to mitigate the above identified risks a targeted Phase 2 Site Investigation should be undertaken to further assess the risks posed by potential ground gases and vapours.

BNG

In regard to BNG, The Environment Act 2021 require development proposals to deliver a net gain in biodiversity following a mitigation hierarchy which is focused on avoiding ecological harm over minimising, rectifying, reducing and then off-setting.

It is considered that the proposed development is exempt from biodiversity net gain requirements as the application site is below the 0.2 hectare threshold. The proposed development does not impact an onsite priority habitat. The proposed development will also impacts less than 25 sq.m. of on-site habitat and less than 5.0m of on-site linear habitats. As a result, the biodiversity gain condition does not apply, as the proposed development benefits from the exemption for development no larger than 0.2 hectares.

5. Summary

In summary, as the site is located in the urban area, an opportunity area and located close to public transport and Gravesend Town Centre, it is considered that the site is suitable to provide 5 further residential units and make effective use of brownfield land in a sustainable location. The application will enable the delivery of a

further 5 residential units, in addition to 37 units previously approved under prior approval and now created at the site, making a valuable contribution to delivery of housing in the Borough. In addition, the proposed basement redevelopment will be of a high-quality design which will enhance the existing building and wider area.

The relevant technical and environmental matters have been appropriately addressed. Therefore, for the reasons set out in this statement and in the documents supporting this planning application, we request Gravesham Borough Council to consider these development proposals favorably and to grant planning permission.

We trust you have all the relevant information to register and validate this application. We would be grateful if you could acknowledge receipt of this application.

Yours faithfully,

A handwritten signature in black ink, appearing to read "B. Tattersall".

Ben Tattersall MRTPI
Associate