



Section 55 Town and Country Planning Act

Design and Access Statement

Ground Floor Flat 19 Edwin Street, Gravesend DA12 1EH

Install of lightwell to allow occupation of the basement

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Site Information

Consultant	Jonathan McDermott
Client	Aaron Prowse
Site Address	Ground Floor Flat 19 Edwin Street, Gravesend DA12 1EH
LA	Gravesham
Description of Development	Install of lightwell to allow occupation of the basement
Pathway (PD/Application/Appeal)	Application

Constraints Review

Flood Risk Zone	1
Contaminated Land	No
Tree Preservation Order	No
Heritage Assets	Kings Street Conservation Area
Noise Abatement Areas	No
Explosive Hazard Areas	No
National Landscape	No
Special Protection Area	No
Site of Special Scientific Interest	No
RAMSAR Convention Site	No
Site of Importance to Nature Conservation	No
Article 4(2) Directions	Not Relevant



Local Policy Requirements

Local Plan/Core Strategy

Core Strategy 2014

Effective Policies in Development Control

Policy CS01: Sustainable Development
Policy CS19: Development and Design Principles
Policy CS20: Heritage and the Historic Environment

SPG/SPD's

Gravesham Borough Council King Street Conservation Area
Character Appraisal.

Planning History

Relevant History

Conversion of ground floor into a one bedroom self contained flat.

Ref. No: 20110399 | Status: Application Permitted

Application for minor material amendment and removal of condition 5 to planning permission reference number 20110399 conversion of ground floor into a one bedroom self contained flat; to allow double glazed slimline sash windows and condition 5 to be removed.

Ref. No: 20160451 | Status: Application Permitted

Application for the approval of condition 5 attached to planning permission reference no. 20160451 relating to the positioning of the windows within the opening and details of the rendered window cills.

Ref. No: 20180047 | Status: Permitted

Report Date

15 January 2023



1. Introduction

1.1. The application site relates to a 3 storey end-of-terrace building comprising 2 self contained flats (Class C3). The application seeks approval to install a lightwell.

1.2. The existing building is within the King Street Conservation Area, it is not a listed building and not within an established flood risk zone. As such there are no overriding environmental constraints preventing the installation of a lightwell.

1.3. The proposal seeks to allow the use of the basement as part of the accommodation afforded to the ground floor flat.

About Town Planning Expert

1.2. Town Planning Expert is a general needs planning consultancy formed in 2012 and practising as a Chartered Planning Practice. Town Planning Expert is instructed to submit a planning application for development as set out below.

Our VICTORY © Framework

1.3. Our VICTORY Framework applies a policy, plan lead, approach to development with the intent of gaining planning permission in a manner that complies with National and Local Planning Policy in accordance with S38 of the Planning and Compulsory Purchase Act 2004.

The Development Proposed

1.4. Planning permission is sought to establish a lightwell within the existing former draymans hatch to the front of the property.

Executive Summary

1.5. The proposal makes best use of an existing feature of the building and would allow the basement to be a functional part of the ground floor flat. As such there is no component of the Local Plan or National Framework that would seek to prevent this form of development and the proposal would preserve the character and appearance of the King Street Conservation Area.

2. National and Local Development Frameworks.

National Planning Policy Framework

2.1. The National Planning Policy Framework was revised in response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation on 19 December 2023 and sets out the government's planning policies for England and how these are expected to be applied. On 5 September 2023 the Secretary of State for the Department for Levelling Up, Housing and Communities issued a written ministerial statement to update policy on planning for onshore wind development in England. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021 and updated in September 2023.

2.2. The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). The relevant sections of the NPPF are set out below:

Introduction

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other

development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.

2. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

3. The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.

4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.

5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.

Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the

United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.

8 This includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.

Development Contributions

34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

Decision Making

38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Pre-Application engagement and front-loading

39. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.

40. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they

should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.

41. The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.

Determining Applications

47. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

48. Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Planning conditions and obligations

55. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

56. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.

Delivering a sufficient supply of homes

60. 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.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

63. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with

disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

70. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing;*
- c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
- d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

72. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

79. To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing

requirement over the previous three years, the following policy consequences should apply:

a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;

b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of this framework, in addition to the requirement for an action plan.

c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

80. The Housing Delivery Test consequences set out above will apply the day following the annual publication of the Housing Delivery Test results, at which point they supersede previously published results. Until new Housing Delivery Test results are published, the previously published result should be used.

83. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

c) the development would re-use redundant or disused buildings and enhance its immediate setting;

d) the development would involve the subdivision of an existing residential building; or

e) the design is of exceptional quality, in that it:

- is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area

Promoting healthy and safe communities

97. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Promoting sustainable transport

108. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) 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 e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

110. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large scale transport facilities that need to be located in the area 42, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements;

and f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

111. If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

112. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

113. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

115. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

116. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

Making effective use of land

123. 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. Strategic policies

should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

124. Planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

Achieving well-designed places

131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these

will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

132. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

133. To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.

134. Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.

135. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) 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 users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Conserving and enhancing the historic environment

200. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary

expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

203. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

208. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

212. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

213. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Local Policy

2.3. The relevant policies are located within the Gravesham Local Plan Core Strategy and are set out below.

2.4. The applicant sets out below their reasons why this development complies with the noted policies in full.

Policy	Comment
Policy CS01: Sustainable Development	The proposal re-uses an existing part of an existing building which meets the objectives of sustainable development.
Policy CS19: Development and Design Principles	The proposed development would not have a substantive impact on the appearance of the existing building and the proposed lightwell allows light penetration into the basement improving its utility.
Policy CS20: Heritage and the Historic Environment	The proposal would preserve the character and appearance of the Conservation Area.

3. The Planning History

3.1. The relevant planning history of the site is as follows:

Conversion of ground floor into a one bedroom self contained flat.

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Ref. No: 20160451 | Status: Application Permitted



Application for the approval of condition 5 attached to planning permission reference no. 20160451 relating to the positioning of the windows within the opening and details of the rendered window cills.

Ref. No: 20180047 | Status: Permitted

4. Site, Context and Comparable Forms of Development

4.1. The existing building relates to a three storey end-of-terrace building that contains two self contained flats (Class C3), located at the end of Edwin Street on the corner with Saddington Street.

4.2. The property is within a predominantly residential area interspersed by commercial buildings and within the King Street Conservation Area.

4.3. The property was, up until approximately 2008, a tap room/ale house (Public House) with residential accommodation above. This use ceased in 2009 and the property was finally converted to a pair of dwellings in approximately 2018.

5. The Development Team

5.1. The developer comprises a small business operating within Gravesend and delivering quality units of living accommodation for local occupations.

5.2. Where possible the applicant utilises local builders and other trades in order to carry out development.

6. Alternative Forms of Development Considered

6.1. The basement accommodation forms part of the ground floor flat's demise. As such the basement can be used by the ground floor flat already for purposes that are non-habitable such as a study, storage, kitchen or games room.

7. Constraints to Development

7.1. Aside from the location within the Conservation Area, subject to the Heritage Assessment below and the location of the former draymans hatch/lightwell within the front forecourt which will necessitate the protection of the opening via railings there are no other constraints that would prevent opening the hatch and exposing the original opening below.

8. The Social Benefit to Development

8.1. A sustainable development reduces their environmental impact and promotes health and well-being.

8.2. In 2015 the House Builders Federation reported that housebuilding nationally:

- Supports 600,000 jobs
- Contributes £19.2bn a year to the UK economy
- Spends £5.5bn with suppliers, 90% of which stays in the UK
- Generates £1.4bn per year in tax revenues for the Exchequer
- Provides 32,000 affordable homes – worth £2.3bn – built or financed by private house building with a further £1bn paid to local authorities as a contribution to more affordable housing
- Pays £576M towards community facilities including;
- £225M towards education facilities alone - enough to fund 52,000 classroom places;
- £131m in open spaces and community and sports facilities, and
- Generates a £3.8bn spend in local shops and services

8.3. A Sustainable building has the following ten advantages:

- Efficiency in energy use: One of the primary benefits of sustainable building is increased energy efficiency. It can reduce carbon footprints because they use less energy. In addition, energy-efficient technologies such as double-paned windows and insulation are utilised.

- **Water Efficiency:** Sustainable buildings also conserve water. They use low-flow toilets, showers, and faucets and implement rainwater harvesting systems. As a result, water is saved, water bills are reduced, and local water resources are less strained.
- **Enhanced indoor air quality:** Indoor air quality is improved by sustainable buildings. They use low-emission materials, have sound ventilation systems, and promote healthy indoor air by reducing pollutants and allergens.
- **Durability:** Durable materials are often used in sustainable buildings. The result is both a reduction in waste generation and a reduction in the need for frequent maintenance and repairs.
- **Better Health:** Sustainable buildings promote better health for those who use them. The air quality is better, natural light is encouraged, and green spaces are available. This can lead to reduced stress levels and improved mental and physical health.
- **Increased Productivity:** Sustainable buildings have been shown to increase productivity. A healthier, more comfortable work environment leads to higher motivation and engagement.
- **Cost Savings:** Although Sustainable buildings may have a higher upfront cost, they can result in significant cost savings in the long term. Energy-efficient buildings reduce energy bills, and water-efficient buildings reduce water bills.
- **An increase in property value:** Sustainable buildings are often more valuable than conventional ones. They are in high demand and can fetch a higher rent or sale price.
- **Environmental Sustainability:** Environmentally friendly buildings reduce the impact on the environment. They conserve resources, reduce waste, and promote sustainable practices.
- **Increased Market Demand:** There is a growing demand for sustainable buildings from consumers and businesses alike. As a result, sustainable building technologies and practices have attracted more investment.

8.4. Ultimately, sustainable building offers a multitude of benefits to both individuals and the environment. It promotes energy efficiency, water conservation, improved indoor air quality, durability, better health, increased productivity, cost savings, increased property value, environmental sustainability, and increased market demand.

8.5. To this end modern development on sites such as that as presented by this application assists the government in achieving the 18 global sustainability goals and improves the sustainability of the wider area as a whole.

9. The Principle of Development

9.1. There is no policy impediment to the opening of the former draymans hatch and the creation of a lightwell to provide light into the existing basement area. As such the principle of development is acceptable.

10. Site Capacity Assessment.

10.1. This proposal does not alter the scale, layout, quantum of development, landscape setting or amenity of adjoining or surrounding occupants. In addition the development will improve the amenity of the existing occupants of the ground floor flat allowing greater utilisation of the basement. As such the site is considered capable of accepting this alteration without substantial effects to surrounding or existing occupiers.

11. Appearance and Heritage Assessment

11.1. The site is within the King Street Conservation Area and therefore a heritage assessment is required. The site is located within Character Area 5 of the CA and the Conservation Area Appraisal remarks upon the building stating:

On the southern side of the road is a characterful group of 19th century commercial properties that include large timber gates and a 19th century public house on the corner. The Little Wonder Alehouse has a distinctive rounded corner with a curved timber sash window, but stands rather forlornly on the corner where it marks the southern extent of the area before the streetscape gives way the network of residential roads, interspersed with

small chapels and commercial premises that fill the New Town.

11.2. The re-use of the property is noted as an area for improvement on page 26 of the CAA.

11.3. The proposal seeks to re-use the existing draymans hatch which has been retained within the front of the property as a lightwell providing light into the basement via an existing opening. This in itself would see the removal of the existing hatch doors, cleaning out of the hatchway and installation of a window at basement level.

11.4. The proposed window will match that found on the building above and would not be readily visible within the streetscene.

11.5. The lightwell will be protected by a simple railing to prevent fall or trip hazards down into the lightwell from any person transgressing the private forecourt of the property.

11.6. As such the proposed window, railings and lightwell would preserve the character and appearance of the Conservation Area and therefore accords with local and national policy in this regard.

12. Access Appraisal

12.1. Aside from the partial closure of the existing private forecourt the development would have no effect on the safety and convenience of the Highway.

13. Planning Obligations and Affordable Housing Statement

13.1. The development does not cross the threshold for planning obligations or affordable housing.

14. Conclusion

14.1. The proposed lightwell offers an opportunity to provide natural light to the basement of this property in a manner which would have no deleterious effect on the character and appearance of the street scene, nor would it impact the amenity of adjoining and surrounding occupiers.



14.2. As such it is submitted that planning permission should be granted for this development and the applicant looks forward to discussing the matter with the Gravesham Borough Council.