

Design & Access Statement - 5316

June 2022

Conversion of part of the existing offices into 2 [no] 2b3p duplex flats and erection of new building to the rear to provide 4no.1b2p flats with associated parking

*49-50 Windmill Street
Gravesend, Kent DA12 1BG*



Fig 1 - 1-4 South Street Mews

1.0 Introduction & Use

This planning application is for the development of Nos. 49 and 50 Windmill Street and land to the rear facing Parrock Street Car park to provide 4 no. 1b2p flats with associated parking. The development also comprises the replacement of an existing rear outrigger and conversion of existing offices at Nos. 49-50 to provide 2 no. 2b3p flats. A substantive amount of office space within the existing building is to be retained

Nos. 49 and 50 Windmill Street are part of the Grade II Listed St George's Terrace (Nos. 38-50) on the eastern side of Windmill Street.

The existing building has two principle entrances on Windmill Street. The rear yard accommodates staff parking and is accessed from via North Street to the south of the site.

The existing building provides dated office accommodation and as a result of this the existing leasee intends to vacate and relocate to more modern office accommodation. As a result of this intension the existing owner proposes the enclosed proposal to make best use of the site while still retaining a viable office and commercial area presence.

2.0 Site Context, Constraints and Opportunities

Principle of Development

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014; and
- Saved policies in the Gravesham Local Plan First Review, November 1994.

The relevant policies are as follows:

Gravesham Local Plan Core Strategy (September 2014):

CS01 – Sustainable Development
CS02 – Scale and Distribution of Development
CS05 – Gravesend Town Centre Opportunity Area
CS07 – Economy, Employment and Skills
CS11 – Transport
CS12 – Green Infrastructure
CS18 – Climate Change
CS19 – Design and Development Principles
CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (November 1994):

TC2 – Policy for Listed Buildings
TC3 – Development Affecting Conservation Areas
T1 – Impact of Development on the Highway Network
T2 – Channelling of Traffic onto the Primary and District Distributor Network
P3 – Vehicle Parking Standards
E5 – Change of Use to Offices

National Planning Policy Framework (February 2019):

Section 2 – Achieving sustainable development
Section 5 – Delivering a sufficient supply of homes

Section 6 – Building a strong, competitive economy
Section 8 – Promoting healthy and safe communities
Section 9 – Promoting sustainable transport
Section 11 – Making effective use of land
Section 12 – Achieving well-designed places
Section 15 – Conserving and enhancing the natural environment
Section 16 – Conserving and enhancing the historic environment

Other Material Considerations

Supplementary Planning Guidance and other Documents:

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals.

In addition the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/home/planning-and-building/supplementary-planning-guidance/supplementary-planning-guidance>

The following documents are relevant to the application:

- SPG2 – Residential Layout Guidelines (2020)
- SPG4 – KCC Parking Standards (2006)
- Technical Housing Standards – Nationally Described Space Standards (March 2015)
- Upper Windmill Street Conservation Area Character Appraisal (2009)
- Management Plan – Gravesend Town Centre Conservation Areas (2009)

The site is located in close proximity to the town centre boundary and lies within the Gravesend Town Centre Opportunity Area (CS05), in which a mix of employment and residential uses are encouraged.

This application has considered the main issues raised in Gravesham's pre application response letter (*ref. PRE20210063*) which states *'the principle of residential development as proposed would generally be supported'*, and *'Indeed, the conversion of the upper floors to flats in other buildings in the terrace has been established'*.

The proposal is fully consistent with national, strategic and local policies in relation to housing provision in that it represents the re-development of previously developed land for residential purposes, at a density reflecting the fact that this is an urban area with good access to public transport and local facilities, especially schools and local industrial estates. This is therefore a sustainable location for such a development. The housing to be provided will assist in meeting the Council's overall housing land requirement without the need to develop fresh land. The proposal is to provide housing in the form of 2 and 1 bedroom apartments, which will add to the diversity of housing provision in the area.

Similar proposals converting offices above commercial space has been approved by Gravesham Council with listed building consent.

1. Much of the office accommodation has been empty for some time with little demand for viable occupancy levels.
2. The proposal will utilise the floor space for residential apartments as shown and encouraged by National Planning Policy.

3.0 Site Planning History

Relevant Planning History

<i>Application No.</i>	<i>Description</i>	<i>Status</i>	<i>Decision</i>
20140680	change of use of single storey rear extension from Class A2 offices to a one bedroom self-contained flat, change of use of 1st and 2nd floors from Class A2 offices to two, 2 bedroom self-contained flats incorporating external alterations to rear elevation and demolition of an outbuilding at the rear.	Permitted	Dec 2014
20180664	Erection of a single storey rear extension.	Permitted	Aug 2018
20180996	Conversion of existing retail shop and basement, and erection of rear extension at ground floor and basement level to provide 1no. two bedroom self-contained flat	Permitted	Aug 2019
20210018	Demolition of rear extension with the construction of a two storey rear extension from basement level, alterations to front elevation and change of use from Use Class E(a) hairdressers to Use Class E(gi) office space on ground floor and basement level	Permitted	June 2021
PRE20210063	Extension and change of use from offices to 8 flats (Nos. 49-50)	Pre App Advice	March 2021
20211590	Conversion of existing first and second floors from a 3 bedroom dwelling to 2 x 1 bedroom self-contained flats.	Permitted	April 2022
19960618	Application for Listed Building consent for the demolition of the	Permitted	Feb 1997

	garages at the rear to provide car park and erection of a 1.85m high brick boundary wall to the side and rear involving the repositioning and widening of the existing entrance gates. (Nos. 48-50)		
19960617	Demolition of the garages at the rear to provide a car park and erection of a 1.85m high brick boundary wall to the side and rear involving the repositioning and widening of the existing entrance gates. (Nos. 48-50)	Permitted	Feb 1997
19830766	Demolition of garage at the rear. (Nos. 48-50)	Permitted	Dec 1983
19740485	Retention of three lock-up garages. (Nos. 49-50)	Permitted	Oct 1974
19790349	Formation of a car park for 3 parking spaces. (Nos. 48-50)	Permitted	June 1979
19770288	To reinstate bricked up window to basement front room. (No. 49)	Permitted	June 1977
19740485	Extension and change of use from Retention of three lock-up garages. (Nos. 49-50)	Permitted	Oct 1974
20140680	change of use of single storey rear extension from Class A2 offices to a one bedroom self-contained flat, change of use of 1st and 2nd floors from Class A2 offices to two, 2 bedroom self-contained flats incorporating external alterations to rear elevation and demolition of an outbuilding at the rear.	Permitted	Aug 2018
20180664	Erection of a single storey rear extension.	Permitted	Aug 2018
20180996	Conversion of existing retail shop and basement, and erection of rear extension at ground floor and basement level to provide 1no. two bedroom self-contained flat	Permitted	Jun 2021
20210018	Demolition of rear extension with the construction of a two storey	Permitted	

	rear extension from basement level, alterations to front elevation and change of use from Use Class E(a) hairdressers to Use Class E(gi) office space on ground floor and basement level		
PRE20210063	Extension and change of use from offices to 8 flats (Nos. 49-50)	Pre App Advice	March 2021
20211590	Conversion of existing first and second floors from a 3 bedroom dwelling to 2 x 1 bedroom self-contained flats.	Permitted	Nov 2022

The conversion of the upper floors to flats in other buildings in the terrace has been established in the past, including at Nos. 40-42 (granted under application 20060861):

Application for Listed Building Consent for internal and external alterations in connection with conversion of first and second floors into two self contained flats; installation of decorative railings to first and second floor front windows; erection of dwarf walls topped with railings with piers and gates along front boundary and improvements to forecourt.

Ref. No: 20060860 | Status: Application Permitted

4.0 Design & Amount

The scheme proposes to retain office use on all levels at no.49 and to retain office use at the ground floor level at no.50. The existing two storey extension at no.50 will be allocated to residential use accessed from the principle entrance.

The residential proposal includes 6 units allocated thus:

- Flat 1 [2B3P] = 91.91 sqm Duplex
- Flat 2 [2B3P] = 90.2 sqm Duplex
- Flat 3 [1B2P] 53.06 sqm
- Flat 4 [1B2P] 57.01 sqm
- Flat 5 [1B2P] 53.06 sqm
- Flat 6 [1B2P] 57.01 sqm

The proposed development will provide a net increase of 6 [no] dwellings; 2[no] within the existing commercial [flats 1 and 2 set over 2 storeys] and 4 [no] within the newly constructed block to the rear [flats 3,4,5 and 6].

The proposal would contribute to local housing need and this clearly weighs in support of the application. The NPPF 2019 also encourages the effective use of land in meeting the need for homes, in particular by making as much use as possible of previously developed or 'brownfield' land (paragraph 117), which this site is considered to be.

Where possible original fireplaces and internal features including ceiling mouldings

will be retained.

Residential Amenity, Future Occupiers and Neighbours

The proposed residential units will be in full compliance and generally exceed nationally described space standards both with regard to GIA and individual room size. The residential units will be provided with a good quality of outlook and visual amenity and will provide good levels of outlook and natural light. The rear block is suitably placed to negate any detrimental effect upon neighbouring properties.

Appropriate levels of storage provision have been allocated within the flats.

The flats will be fully compliant with current building regulations and consideration of fire escape philosophy, accessibility and energy usage will be fully complied with.

Employment

From an employment perspective the loss of commercial space will still allow a reallocation of jobs within the existing commercial space and also new incoming residents will be well placed for the local and wider employment market. Holistically it is assumed that the proposal will have a positive affect upon local employment opportunities.

Transport, Parking and Highways

5 car parking spaces have been allocated in compliance with a car parking ratio of 0.75 per dwelling; one of which will allow disabled visitation. The site has good access to local transport connections on foot with the train station being .22 miles away and the local bus hub .28 miles away on foot:

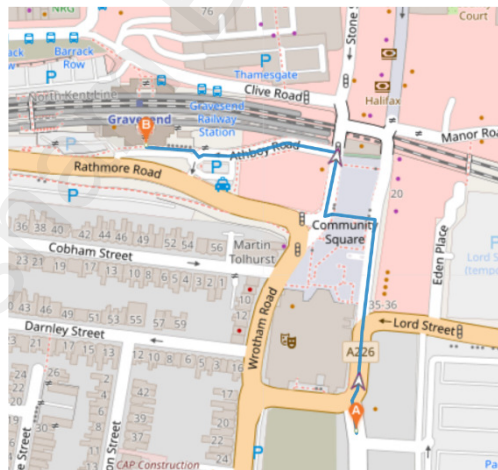


Fig 2 – Pedestrian Access Train Station



Fig 3 – Pedestrian Access Bus Hub

Storage for 8 [no] cycles has been provided which will be designated, secure and weatherproof.

Refuse

A designated refuse store has been provided.

Design and Impact on Listed Buildings and the Conservation Area

NPPF 2019, and in particular paragraphs 124, 127 and 192, require development to achieve high quality buildings and places; and add to the overall quality of the area, be visually attractive, and create acceptable amenity for future occupiers; and to sustain and enhance the significance of heritage assets. This scheme is a significantly reduced scheme from that which the previous pre-application advise is based upon and some of the points raised within the report have been incorporated within this scheme. In particular the way the proposal impacts upon the existing listed property. These matters will be considered further below.

We consider that the principle of conversion to an existing listed building, from office space to residential has already been accepted within Policy E5; especially when we consider the pre application report and other planning applications that have been approved within the locality.

As the heritage asset is clearly presented facing Windmill Street we can see that the proposal will have a little or no effect upon the front elevation view where the existing two storey extension is retained and the front elevation remains unaffected.



Fig 4.

To the rear we can see that the rear of the properties is of an adhoc nature and of limited architectural merit; the rear outriggers along the rear streetscape have been wholly obscured or developed over time. Our proposal has limited direct effect upon this existing streetscape situation. When considering the historic context of the property we can see that the rear of the terraces facing Parrock Street car park was historically allocated as back to back terrace runs - refer to Heritage Statement section titled To the rear of the 49,50 Windmill Street – Parrock Street Car Park.

Although the historic development to the rear streetscape to date has been carried out with varying degrees of quality [refer to fig 2]; we believe that the principle of development facing both Parrock Street and Lord Street car parks has its merits and has a limited effect upon historic built form. We can see further examples where the principle of development to the rear has already been developed. Refer to Fig 7 and 8.

From North Street the road is very narrow and so direct lines of sight back to the site are restricted. The rear block has been introduced to the rear of the site so as to let the existing listed property to breath. This relationship can be seen when considering the North Street elevation.



Fig 5.

Both Lord Street and Parrock Street car parks have experienced a number of instances of assault and car theft both recently and historically and the provision of habitable areas with windows overlooking both of these areas; we believe will enhance security to this part of the town.



Fig 6 – Rear of site



Fig 7 - 1-4 South Street Mews



Fig 8 - 2 South Street Mews



Fig 9 – Rear of Site

It is noted that there are proposals being assessed currently by the LA for the development of the Lord Street car park area which has some bearing on this application.

20211540 Lord Street Car Park Lord Street Gravesend Kent - Change of use from existing car park. Erection of 4 to 7 storey buildings and a 13 storey tower to provide 152 flats, 3377.46 sqm of commercial space, including office, retail, and workshops, with ancillary car parking, open space and access from Eden Place.

We believe that when considering the relationship of built form and car parking areas our proposal introduces a benefit to this part of the town with has a limited detrimental impact upon the heritage asset and will create a good symbiotic relationship with the car park areas.

Other Material Considerations

Birds

As this site is within 6km of the SPA/Ramsar site it is accepted by the client that a tariff of £250.39 per dwelling will be provided towards the cost of measures to mitigate the likely significant effect of additional residential development through the recreational impact on the over-wintering and migrating bird interest. The SAMMS mitigation contribution will be required prior to the determination of this application.

Flood Risk

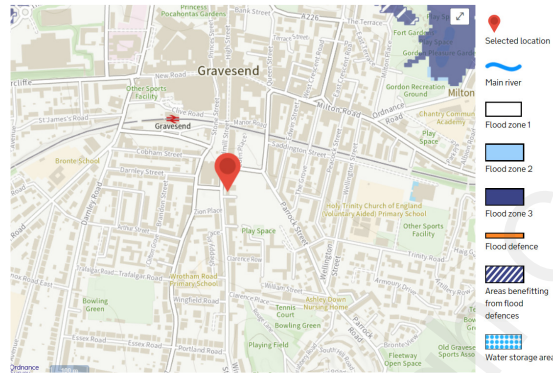


Fig 10 – Flood Risk Map

The site is in flood zone 1. This means it has a low probability of flooding from rivers and the sea.

Conclusion

The proposal addresses previously noted concerns regarding employment loss.

The proposal will provide part conversion and part new build additional housing; the incremental effect of which will contribute to a strong housing need in the borough, which currently is not being met by the LA.

We believe that the integrity of the listed building will be maintained by this proposal. The rear of the terrace buildings to this area have had various alterations over the years and new buildings formed. The existing rear streetscape of the terrace run has limited architectural value and is adhoc by its very nature and due to the previously built forms that have been constructed historically it presents as a fragmented and unattractive area that is disconnected and unsafe at night.

The impact of introducing new built form to the rear of this area will not be to the detriment of the listed building and on balance will be a positive move when considering the effect on the locality and areas facing Parrock Street car park. This proposal will enhance this area of the town and make the area more secure and overlooked and will reconnect the area with the rest of the town.

Overall we think the proposal will make good use of the site while retaining a good percentage of sustainable commercial area. It will also provide good quality residential accommodation that is sustainable and near to the town centre, this is achieved by maintaining the listed heritage asset as viewed from the community square, Windmill Street and the corner of North Street.