

Planning, Design and Access and Heritage Statement

7 Wrotham Road, Gravesend, DA11 0PD

“First floor rear extension and mansard roof extension to enlarge one residential unit and create 2no. new residential units, with associated building facade improvements and landscaping”

Report prepared by Ben Kelly MRTPI

For and on behalf of Forma Property Ltd

September 2025

CONTENTS

1.0 Introduction and Summary

2.0 The Site

3.0 Proposal

4.0 Planning Policy Summary

5.0 Planning Assessment

7.0 Conclusion

1.0 Introduction and Summary

- 1.0 The proposal seeks planning permission for amendments to a recently converted former office building at 7 Wrotham Road, to introduce new residential floorspace and two new units. The proposal will result in an uplift in the overall number of units from 11 to 13 (two additional units) and will improve the living space at Flat 10, as indicated on the accompanying plans. The application also presents the opportunity for external alterations to the façade and to the hard landscaped parking area to improve the appearance of the building and the environment for residents.
- 1.1 The application drawings indicate all proposed new development in red, with already approved/implemented and unchanged layouts in blue for the sake of clarity.
- 1.2 The application is described as follows:

“First floor rear extension and mansard roof extension to enlarge one residential unit and create 2no. new residential units, with associated building facade improvements and landscaping”
- 1.3 The amendments will improve the development proposal agreed under the Prior Approval application to convert the building from office to residential use (Ref: 20231143). The provisions of Class MA Prior Approval do not allow for external alterations to the building and as such a follow up application addressed requirements for replacement windows and new window openings (Ref: 20241015). These proposals will complete the development, leading to better quality living accommodation, as well as boosting local housing supply in a sustainable location via the re-use of an existing building.
- 1.4 This application consists of the following:
 - Site Location and Block Plans, Existing and Proposed Planning Drawings
 - Planning, Design and Access and Heritage Statement (this document)
 - Daylight Sunlight Assessment
 - Application Forms and CIL Form

2.0 The Site

- 2.1 The proposal site comprises 7 Wrotham Road, a vacant office block that has recently had prior approval agreed for a change of use to eleven self-contained units.
- 2.2 The property was originally built as a residential building prior to being converted to offices and extended at roof level and to the rear. The 1960s rear extension infilled a large area of garden space with a two-storey office building fronting Cobham Street, with a small area of car parking to the rear.
- 2.3 The existing building has lower and upper ground floors, with two storeys above, one of which is within the extended roofspace. The rear extension is two storeys from ground level and has an additional storage room at third storey level. There is a car park to the rear of the extension that is accessed via an undercroft.
- 2.4 The site area is 564.35sqm (0.054ha) and the footprint of the building is 317.28sqm. The remaining space is occupied by car parking and the hard landscaped front garden space in front of the original house.
- 2.5 Wrotham Road is an arterial route from the A2 to the centre of Gravesend. It has a varied character and at the north end, around the site, is mixed and predominantly residential. Cobham Street is entirely residential and made up of two, three and four storey terraces, with one three-storey detached home directly opposite the site. The majority of homes here have been subdivided into flats or HMOs.
- 2.6 The front part of the site is within the Upper Windmill Conservation Area and the rear part of the site is within the Darnley Road Conservation Area.
- 2.7 As described in the Upper Windmill Conservation Area Appraisal, the principal feature of the built form in the area is its urban character, with residential buildings dating from the last quarter of the 19th Century. Typically, buildings in the area are two and three storeys and set back from the pavement behind front areas, with dwarf walls and cast-iron railings. Buildings are constructed of yellow brick with detailing of stucco and polychrome brickwork. The front part of the application site is typical of the

Conservation Area in these regards, whilst the rear part of the site is seen as a negative feature.

2.8 The site is well located for shops and services being just 200m from Gravesend Town Centre. It is also just 100m from Gravesend Central Rail Station, with regular services into London and surrounding town centres in Kent.

Planning History

2.9 The following planning history for the site is available on the planning register:

- 20241015 – Creation of new window openings, replacement windows and associated alterations – **Approved July 2025**
- PRE20240198 – Resubmission of proposal for amendments to former office building with Prior Approval to convert to residential use (Ref: 20231143) including; roof level extension to create 2x 2b4p additional units (Use Class C3); first floor rear extension (to amend a 1b 2p unit to a 2b 3p unit); altered external staircase access and internal rearrangement (to amend a 1b 1p flat to a 1b 2p flat); new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation – **Written Pre-application advice received 5th November 2024**
- 20240070 – Amendments to former office building with Prior Approval to convert to residential use (Ref: 20231143) including; roof level extension to create 1x 1b2p and 1x 2b 3p additional units (Use Class C3); first floor rear extension (to amend a 1b 2p unit to a 2b 3p unit); altered external staircase access and internal rearrangement (to amend a 1b 1p flat to a 1b 2p flat); new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation – **Refused 4th April 2024**
- 20231143 - Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted

Development) (England) Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use from office to 11 Flats, internal reconfiguration and all associated works – **Approved 4th January 2024**

- 19880706 - Erection of single storey extension on the north elevation to form a document store – **Approved September 1988**
- 19910077 - Erection of two storey rear extension at first and second floor levels to form boardroom at first floor level with document store over – **Approved July 1991**

2.10 The applications above are material to the consideration of this proposal as they establish the change of use of the building to residential; identified internal layouts that can be achieved under permitted development; established new window types; and established the principle for increased height to the rear office building. The pre-application advice also supported the principle of the proposal and the design approach taken for the mansard. The full written advice is included at **Appendix 1** and summarised below:

- Submit planning application for window replacement and external elevation treatments first:
 - Windows - please follow email advice and use Gravesham's window guidance.
 - Elevations – remove the panelling below first floor windows, to match the general wall construction. Painted render and colour to respond to adjacent painted surfaces.
- Mansard roof upward extension should be option A-2 with velux windows;
- Address internal floor area for the flats – currently undersized and substandard;
- Ensure that the floor-ceiling height meets the 2.3m minimum within the NDSS;

- Provide daylight/sunlight assessment for the northern flats;
- Remove carparking and create a shared amenity space for future occupiers.

2.11 The proposal has evolved in line with this advice, with some minor changes. The windows application has been submitted and approved, with only the painting and rendering of the façade reserved for consideration under this new application. The car parking has only been part removed, with two spaces retained for the new flats, allowing the rest of the area to be used for communal cycle storage, waste storage and as general amenity for residents. This creates a more easily managed and secure space for all.

3.0 Proposal

3.1 The proposal seeks to extend the building and improve on the recently approved proposal to change the use of a vacant office premises to residential (11 flats), via a series of minor amendments and small extensions to the building.

3.2 The proposals will increase the total amount of residential floorspace from 752.79sqm to 901.69sqm, facilitating two new units at roof level (Flats 12 and 13) and an enlarged Flat 10 at first floor level.

3.3 The change of use of the building has already been established and a follow up application has replaced windows and infilled areas of cladding that have been removed. The proposed changes within the scope of this application are summarised as follows:

- Two additional C3 units (2x 2b3p) within a roof extension;
- Enlargement of Flat 10 by 34.8sqm via a second storey rear extension (1b2p unit to a 2b3p unit);
- Reconfiguration of car park and servicing area and introduction of soft landscaping;
- New gated access to rear communal area;
- Painting of the brickwork and stone bands around the façade.

3.4 These changes are summarised in the proposed development description as follows:

“First floor rear extension and mansard roof extension to enlarge one residential unit and create 2no. new residential units, with associated building facade improvements and landscaping”

3.5 The principle of residential use at the site has already been established via the prior approval application and the design of the extension has been supported in pre-application following the refusal of an earlier application. The proposals will add two new units to the local housing stock in a sustainable town centre location and will

ensure a better standard of accommodation for future occupants.

- 3.6 The proposal responds to the previous refusal at the site, seeking to amend the design of the roof level extension and proposing a new material palette with the aim of making the extension more attractive, improving the local built environment, and enhancing the Conservation Area. Accordingly, the brickwork will be painted white, in order to remove the mismatch in the brick type compared with surrounding development, and the existing stone bands will be painted grey to provide a contrast, and to tie in with the proposed zinc cladding of the roof.
- 3.7 Internally, the layouts have been reviewed following the guidance set out in the Residential Layout SPG and the National Technical Space Standard. Minor adjustments have been made, and the spaces now show that the living spaces meet the requirements of the SPG and can easily accommodate the furniture and fittings normally associated with their use. The window positioning has been reviewed for each room to ensure that internal light levels are maximised whilst the potential for overlooking or privacy issues are minimised.

4.0 Planning Policy Summary

4.1 Planning law sets out that planning applications are determined in accordance with the Councils Development Plan unless material considerations indicate otherwise. The Development Plan for Gravesham consists of:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) – saved Policies
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)

4.2 In accordance with the Local Plan Policies Map, the proposal site is within an Opportunity Area (CS03-CS06) and at the edge of the defined Town Centre (CS08). The front part of the site is within the Upper Windmill Conservation Area and the rear part of the site is within the Darnley Road Conservation Area (CS20). Each have a Conservation Area Appraisal associated.

Core Strategy

4.3 The following policies of the Core Strategy are considered most relevant:

- Policy CS01: Sustainable Development
- Policy CS02: Scale and Distribution of Development
- Policy CS05: Gravesend Town Centre Opportunity Area
- Policy CS11: Transport
- Policy CS14: Housing Type and Size
- Policy CS15: Housing Density
- Policy CS18: Climate Change
- Policy CS19: Development and Design Principles
- Policy CS20: Heritage and the Historic Environment

4.4 The Council undertook a review of the Plan in September 2019 finding that there was a need for a partial review in terms of Policy CS02, due to the increased need for

housing.

Local Plan (Saved Policies)

4.5 The following saved policies of the Local Plan are of most relevance:

- P3 – Vehicle Parking Standards
- P5 – Exceptions to Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas
- T1 – Impact on the Highway Network

Supplementary Planning Guidance

4.6 The following documents provide additional guidance to support adopted policy.

- SPG2 - Residential Layout Guidelines (2020)
- SPG 4 - KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Darnley Road Conservation Area Appraisal
- Upper Windmill Conservation Area Appraisal
- Management Plan Gravesend Town Centre Conservation Areas (2009)

Other Material Planning Considerations

4.7 Other material considerations include:

- National Planning Policy Framework
- National Design Guide
- Nationally Described Space Standards

4.8 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

- 4.9 Gravesham are not current able to demonstrate a 5-year housing land supply, with a 3 year supply most recently calculated in the February 2025 Housing Delivery Test. As this is substantially below (less than 75%) that required, the housing delivery element of Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF.
- 4.10 The presumption in favour of sustainable development therefore applies, with planning permission granted 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.*
- 4.11 In determining applications for planning permission involving housing, the Council must therefore apply a weighted balance in favour of granting planning permission.

4.0 Planning Assessment

4.1 The principle of residential development at this site has already been established and the existing building has been recently converted. The key planning considerations in relation to this proposal are as follows:

- Housing Need
- Design, appearance and impact on the Conservation Area
- Amenity of Future Occupiers
- Neighbouring Amenity
- Environmental Protection
- Highways Impact

Housing Need

4.2 With regard to housing need, Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence shows that the Council is not able to demonstrate a five-year housing supply, with the latest figures showing just 3 years (Housing Delivery Test, February 2025).

4.3 In decision making, if an authority cannot demonstrate a five-year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply when considering planning applications, as set out in paragraph 11(d) of the NPPF. As Gravesham is unable to demonstrate a five-year housing land supply, the council is required to undertake a balancing exercise when considering planning applications, to ensure that the correct weight is attached to the shortfall in meeting the five-year housing land supply requirement and the provisions within the NPPF.

4.4 The proposal provides a modest uplift of two units but will support a scheme that will deliver a total of 13 units in a highly sustainable location, walking distance from

Gravesend Rail Station and the town centre. Given the substantial shortfall in housing supply substantial weight can be given to any development that delivers housing in the area, particularly in a location such as this. The principle of converting the office space has already been established and the current proposal seeks to improve the buildings and make more efficient use of the available land, in accordance with paragraph 128 of the NPPF.

Design, appearance and impact on the Conservation Area (Heritage Assessment)

- 4.5 The main change to the building relates to the replacement of the existing office storage area at roof level with a set-back third storey consisting of two self-contained residential units. The additional storey will form a mansard roof, set back from the building edge to ensure that it is a recessive feature in the streetscape and that it does not disrupt the transition in the building line to 55-58 Cobham Road.
- 4.6 Whilst visible from the street, the set back and sloping roof will significantly reduce the impact. The proposed use of zinc cladding was supported by officers during pre-application discussions where different design options were presented. The existing building is an anomaly in the streetscape and has been identified as being of poor design. As such, the design approach is to enhance the building to improve the general quality of development, without seeking to replicate the more traditional design and materials of the other buildings in the street, which are more characterful of the conservation area.
- 4.7 The proposal will significantly improve the site in views along Cobham Road and views from Rathmore Road and Wrotham Road, replacing the box like storage building with an attractive zinc-clad mansard. Two different options for the windows of either projecting dormers or velux style windows were presented to officers at pre-application stage. Following the written advice received, the velux style dormer has been selected and the windows have been sized and positioned to align with the windows below. The painted building would complement the existing white render at the end of the street (opposite corner of Cobham Street and Wrotham Road).

4.8 The model images at Figures 1 & 2 illustrate the improvements to the building and how the extension mirrors the angles of the original building and fits in. The roof extension offers the opportunity to enhance a poor quality extension.

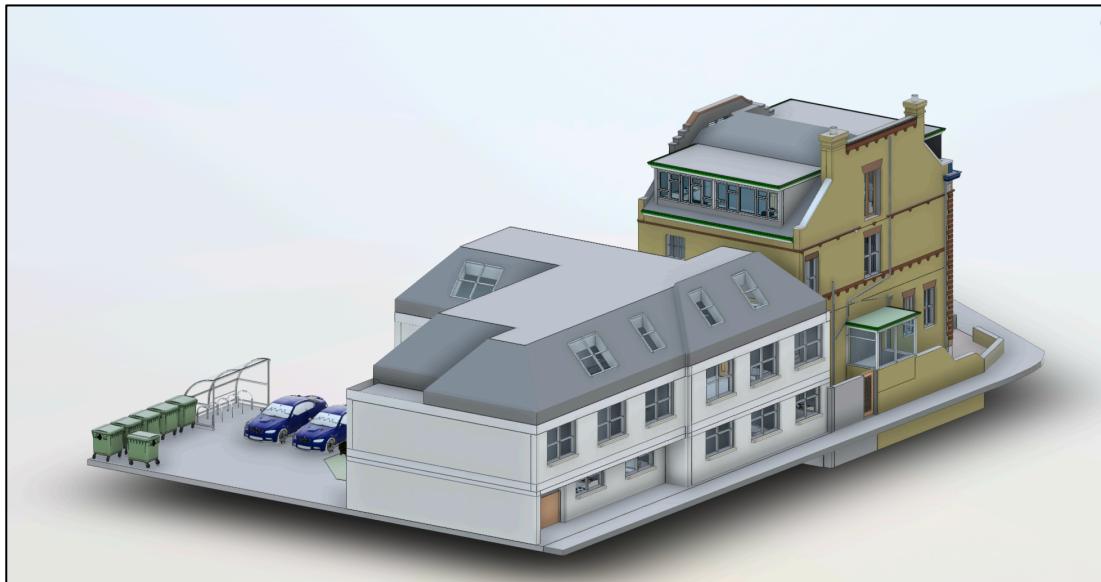


Figure 1 – Computer generated model of proposed extension (front)



Figure 2 – Computer generated model of proposed extension (rear)

4.9 The other amendments to the building are minor in nature and mainly confined to the rear. The extension to the rear will be above an existing extension and will only be visible in glimpsed views from Rathmore Road. The existing office car park is to be reconfigured to provide space for two vehicles and a soft landscaped amenity area,

along with the bin and bike store (all visible in Figure 2).

4.10 Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. The site is located partly within the Upper Windmill (front), partly within the Darnall Road (rear) Conservation Area, and partly outside of both (See Fig 3).

4.11 The site is within Upper Windmill Character Area 4: Wrotham Road. No 7 Wrotham Road is described in the appraisal as being of two storeys over a raised basement, with centrally placed canted bay at basement and ground floor levels. The building is constructed from yellow brick, with distinctive raised red and blue brick detailing of architectural features, such as quoins and a cornice. Unfortunately, it notes, this building has been the subject of a large box roof extension, which has undermined the well-considered proportions of the historic building.

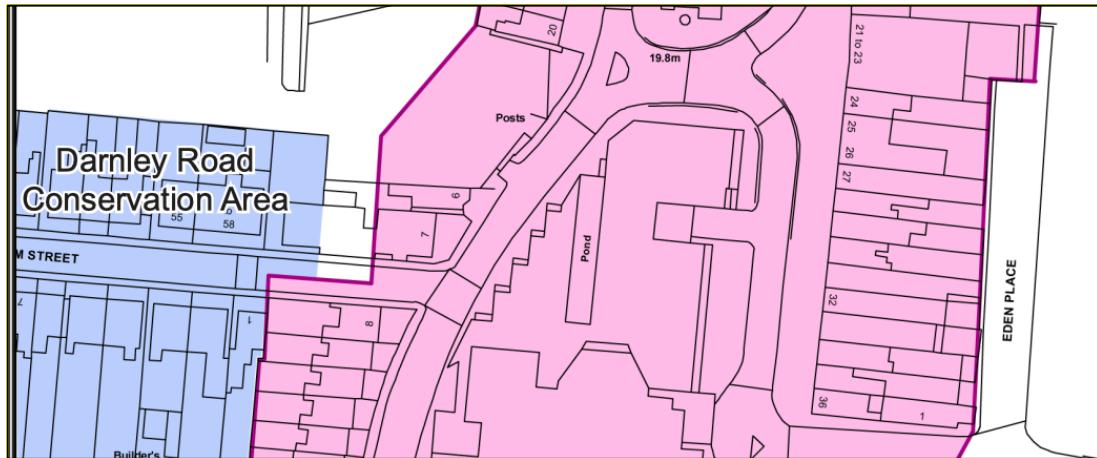


Figure 3 – Upper Windmill CA in Pink and Darnley Road CA in Blue

4.12 The principal features of the built form in the area are its urban character with residential buildings dating from the last quarter of the 19th Century. Typically, buildings in the area are two and three storeys and set back from the pavement behind front areas, with dwarf walls and cast-iron railings. Buildings are constructed of yellow brick with detailing of stucco and polychrome brickwork.

4.13 Negative features of the area are the volume, speed and associated noise of traffic;

slate roofs replaced with concrete tiles; and demolition of boundary walls to create off road vehicle parking areas. The Darnley Road Conservation Area Appraisal specifically notes the negative features of Character Area 2: Cobham Street and Darnley Street, as the appearance of the rear extension to no.7 Wrotham Road. It is therefore clear that the front of the building is worthy of more attention than the rear.

4.14 Policy TC3 requires that development in Conservation Areas will be judged on their impact and will be expected to make a positive contribution. The investment in the property as a whole will benefit the area. The use of a high quality contemporary material (zinc) for the roof will both complement and elevate the existing building, coupled with the recent refurbishment works and painting of the façade. The existing third storey storage extension is incongruous, and the proposed extension will be more suited to the host building and to the area. As such it is considered that the Council's responsibilities under S72(1) can be discharged.

Amenity of Future Occupiers

4.15 The application will improve the internal accommodation of one of the existing units agreed under Prior Approval (Flat 10) by increasing its size from a 39sqm studio flat, to a 69sqm two-bed three-person unit with large dual aspect living space.

4.16 The new units within the roof space (Flats 12 and 13) have been designed to meet and exceed national minimum space standards as follows:

Unit Number	Type	GIA	Minimum	Difference
Flat 12	2b 3p	62.95sqm	61sqm	+1.95sqm
Flat 13	2b 3p	78.13sqm	61sqm	+17.13sqm

Table 1 – Space Standards

4.17 As the proposal is predominantly a roof extension linked to a previous office conversion, there is little opportunity to provide external outdoor amenity space either individually or communally. However, the relandscaping of the car park area will provide a secluded communal space for residents with seating. There are also a number of open spaces and outdoor recreational spaces within walking distance of

the site, including the Riverside Leisure Area and Gravesend Promenade, Gravesend Cricket Club, Dashwood Open Space and Woodlands Park. There is also an indoor communal space for residents which can be used flexibly for homeworking or leisure.

- 4.18 New windows were inserted to flats under application 20241015 which has materially improved the level of daylight in the building. A daylight and sunlight assessment has been undertaken to demonstrate compliance with BRE guidelines for all flats.
- 4.19 Internally the two new flats are well proportioned and intelligently arranged. All of the rooms meet the National Guidance and SPG Guidance, with one exception. The combined area of kitchen/diner/lounge in flat 12 is 24sqm, which although well in excess of the standard for a kitchen/diner (12sqm) would fall short by 1.2sqm if the standard for a lounge (13.2sqm) is added to this. The guidance is not clear whether a total of 25.2sqm is expected when all three are combined. It would be possible to increase the area by this amount, but only at the expense of the quality of the layout. As such the potential shortfall is considered acceptable, particularly given the flat as a whole exceeds minimum standards by more than this amount.

Neighbouring Amenity

- 4.20 The proposal will add two units to that already approved under application 20231143. In terms of noise and activity, the impact of the additional units would be negligible. None of the proposed new windows directly face neighbouring windows and there is over 10m separation between the west facing windows on the new extension and the amenity area to the rear of the neighbouring houses.
- 4.21 The proposed additional storey slopes back from the building edge to avoid impinging on the outlook of neighbouring properties and ensuring no material impact on daylight, sunlight and overshadowing. This has been verified via the NRG Consulting Daylight and Sunlight Assessment. Accordingly, neighbouring amenity will be protected.

Environmental Protection

- 4.22 The proposal is located within 6km of The Thames Estuary and Marshes Ramsar site

and Special Protection Area (SPA). Developers are expected to pay a fee of £337.49 per additional C3 unit of accommodation. The proposal would provide an uplift of two new units and as such a contribution of £628.10 is due. This will be discussed with the case officer and provided prior to determination.

Highways, Parking and Servicing

4.23 Policy CS11 states that parking should be provided in line with adopted standards. In this instance it would mean the Kent Vehicle Parking Standards (2006) SPG; The Kent Design Guide Review: Interim Guidance Note 3: residential parking (2008) and the Kent design guide: movement & connectivity: parking standards (2022). These documents set out that residential car parking should be provided at a maximum of one off-street space per unit based on the proposed unit mix and edge-of-centre location. However, reduced levels of provision are supported where effective mitigation measures are in place including Controlled Parking Zones and the availability of sustainable transport modes.

4.24 Saved Policy P3 adds that parking standards can be reduced if justified as an exception. Such exceptions would include development in central Gravesend. Saved Policy P5 also states that where the provision of parking would lead to a building being unused or underused the Council will consider a relaxation of standards, providing it does not exacerbate on-street parking problems in the area.

4.25 Due to the highly accessible location, with good access to public transport and local facilities location, residential units within the Pelham Ward typically have far lower levels of car ownership when compared to the overall figures for Gravesham. Furthermore, there is a CPZ in operation in the area, ensuring that parking can be controlled. On this basis, a lower level of parking provision was considered acceptable when approving the conversion of the office to residential use, with five spaces retained for eleven flats. When discussing the addition of two more flats at pre-application stage it was suggested that the whole development should become car free. A compromise position is the retention of two dedicated parking spaces serving the new flats, with the original converted flats becoming car free. This affords more

space for servicing and cycle parking in the rear courtyard and allows for a soft landscaped and planted communal garden with benches, for the use of residents. The area to the rear will remain secure with a key/fob controlled access gate at the front.

- 4.26 Saved Policy T1 states that the Local Planning and Highways Authority will consider the impact on the transport system and the environment of traffic generated by the new development. The increase in the number of units would have a negligible impact on the local area, with traffic movements and parking requirements remaining below the equivalent office use, even accounting for the extended floorspace.
- 4.27 Secure sheltered cycle parking will be provided in the rear courtyard. Gravesham's adopted parking standards (SPG 4) (2006) seeks to ensure that adequate secure cycle storage is provided in developments, with a recommendation of 1 space per unit for flats. In this case the plans show a secure storage with space for no.14 cycles. This is acceptable for the number of units proposed in this application, inclusive of the previously approved flats.
- 4.28 In terms of servicing, a domestic residential bin and recycling storage area will be located to the rear of the site. Bins will be moved to the junction with Cobham Street on collection days.

5.0 Conclusion

- 5.1 The proposed conversion of the office building to a residential use has already been established via a recent Prior Approval application. The proposed amendments and extension to the building will make efficient use of land in a sustainable town centre location and will provide good living conditions for future occupants. There would be no harm to neighbouring amenity or adverse impact on local highways. The proposed changes will improve the building and thereby enhance the setting of the Conservation Areas the site falls within.
- 5.2 The proposal for an additional two units to add to the eleven recently granted, will provide a small but important contribution to help meet an identified shortfall in housing supply. Crucially, it can also be delivered quickly. The required SAMM contribution is agreed and will be paid prior to the development commencing.
- 5.3 The proposals accord with adopted Core Strategy and UDP Policies and the relevant paragraphs within the National Planning Policy Framework. The Council has an identified duty under supply of housing and as such the “Presumption in Favour of Sustainable Development” and the “Tilted Balance” apply. There are no clear reasons for refusal and any adverse impacts of granting permission would not significantly and demonstrably outweigh the benefits of delivering high quality housing in this location.
- 5.4 As such the proposals are considered acceptable and it is respectfully requested that the application is recommended for approval.