

10 September 2024

Dear Ms Fisher

Planning, Design and Access Statement

Description of Development: Change of Use of former Anglo-Saxons Friendly Society offices and meeting space (Use Class E) to 2 x 1 bed flats (Use Class C3), HMO (Use Class Sui Generis), demolition of existing rear single storey flat roofed extensions and removal of 2-storey rear external metal fire escape, construction of new single storey rear extension, new traditionally detailed fenestration at front of building, new dormer window to rear, and new cycle and bin store and the ongoing management plan for those areas.

Location: 2-3 Anglo-Saxons Hall, Berkley Road, Gravesend DA12 2EU

- 1.0. This Planning, Design & Access Statement accompanies the planning application, existing and proposed drawings and Heritage Statement for Change of Use of former Anglo-Saxons Friendly Society offices and meeting space (Use Class E) to 2 x 1 bed flats (Use Class C3), HMO (Use Class Sui Generis), demolition of existing rear single storey flat roofed extensions and removal of 2-storey rear external metal fire escape, construction of new single storey rear extension, new dormer window to rear, new traditionally detailed fenestration at front of building and new cycle and bin store and ongoing management plan at No. 2-3 Berkley Road. A Management Plan for the HMO is included within this planning application. An Acoustic Assessment has informed this application where the two one bedroomed flats are proposed in the former Hall part of the building adjoining the Post Office garage, para. 5.1.3 of that report confirms the current noise protection levels exceed standard requirements.
- 2.0. The Anglo-Saxons Friendly Society moved its premises from Berkeley Road in 2019 in favour of its offices in Northfleet and has been vacant since that time.
- 3.0. This application has been informed by the planning history of this site, discussions with the Anglo-Saxons Friendly Society, pre-application response, site meeting, Heritage Statement (being within the King Street, High Street and Queen Street Conservation Area), Acoustic Assessment and the detailed work undertaken by Clay Architecture Ltd. The applicants have over 20 years experience of producing high quality homes with minimum fuss and providing effective long term management of homes for professional working people, refurbishing existing buildings to a high quality of finish and environmental performance. The attached Brochure shows the quality of their homes.

4.0. The site

- 5.0. The site comprises former office premises for The Anglo-Saxons Friendly Society, at Nos 2-3 Berkley Road. The premises have been extended over the years to include single storey flat roofed extensions and a rear two storey flat roofed extension with external metal fire escape serving the offices. The front elevation has changed little and has a late arts and crafts appearance. The primary alteration to this front façade has been in the insertion of UPVC windows.
- 6.0. The south side of the building adjoins the Post Office garage which has a vehicular entrance operating one way from Queen Street right through its covered way and exiting onto Berkley Road which is gated outside of working hours. To the rear, west, beyond the site's high brick wall is a narrow access route before a flat roofed former industrial unit which has now been converted to a retail unit named Dolphin Yard. Terraced dwellings adjoin the north side of the building and residential dwellings are on opposite side of the road, to the west, infilling towards Harmer Street.
- 7.0. The site sits within The King Street Conservation Area (see separate Heritage Statement). Berkeley Road is part of the historic infil development of late 19th century residential dwellings between Queen Street and Harmer Street. The Anglo-Saxons Friendly Society premises, being named as such on the front of the building, were most likely constructed not long after inception of its own business in 1877.
- 8.0. The total floor area of the existing building is 341m² (3,670.5 ft²).

9.0. Key Planning Policies

Gravesham Local Plan Core Strategy and Policies Map, September 2014

- Strategic Objective 1: Make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet.
- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS14 – Housing Types and Sizes
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review 1994:

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- H6 (iii) – Provision to Meet Special Housing Needs
- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas

Gravesham Borough Council “Guidance for HMO Amenity Standards” Version 2, 2023.

10.0.Key legislation and overlapping regimes

- 11.0. It is a matter of good planning practice to not overlap the regimes of other legislation¹.
- 12.0. However, it is important to emphasise in regard to HMOs and once planning permission has been granted that checks and balances are available outside the planning system and that continue beyond the planning decision.
- 13.0. Specifically in regard to HMOs, the Councils' Housing Department has authority to ensure that HMOs offer decent accommodation via the 2004 Housing Act and its accompanying Statutory Instrument No. 372 'The Management of Houses in Multiple Occupation (England) Regulations 2006'.

14.0. Recent Planning History and legislative changes

- 15.0. Planning permission was granted February 2020 (ref. 20191203) for conversion to residential (1 x 2bed dwelling and 1 x 3 bed dwelling) and to Offices (B1 Use) with demolition of rear extensions and erection of new extensions. This followed an appeal decision, that, whilst dismissed for reasons of lack of outdoor space for family sized dwellings, did accept key principles comprising: the principle of residential conversion; demolition of the more recent rear flat roofed extensions, and; the construction of a large rear flat roofed dormer for converting the roofspace. The current planning permission lapsed in February 2023 and was unimplemented.
- 16.0. The Anglo-Saxons Friendly Society listed their vacant premises for sale on the open market in 2021 – 1 March 2024 with Haart Estate Agents that marketed it through a number of channels including On The Market, Rightmove (online site , haart website, Shop window and email to Haart's client list. There was no interest for partial or total commercial use of the building as per the 2020 permission, ref 20191203 nor its previous commercial use of the entire building.
- 17.0. Subsequent to the 2020 permission, and an earlier refusal concerning loss of offices, Part 3: Changes of Use of the General Permitted Development Order was amended by Statutory Instrument 2021 No.814, that came into force 1 August 2021. It introduced a new permitted change of use, Class MA, intended to help revitalise town centres, for permitting conversion of previously commercial buildings (under Use Class E) to residential use.
- 18.0. This change of legislation occurred after the 2020 planning approval and denoted a seachange in providing a new positive approach to new residential development in place of previously retail and employment uses. The new Use Class E category has further cemented this approach.

¹ NPPF, para. 194 "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes Planning decisions should assume that these ..(other).. regimes will operate effectively."

19.0.The Proposal

- 20.0. The proposal for conversion to residential contributes to delivering Gravesham Borough Council's Strategic Objective 1 of its 2014 Core Strategy where this proposal will bring forward a previously underused building resource for reuse as new dwellings in the form of conversion of a commercial building into 2 new one-bedroomed flats and a 10 bedroomed HMO. Thereby delivering 12 countable units to contribute to the Council's 5 Year Housing Supply and that currently has a significant underdelivery representing 2.9 years, less than 75% of that required by the Housing Delivery Test.
- 21.0. Nos 2-3 Berkley Road sit between mixed commercial uses and a residential area, directly adjoining the Post Office garage to the south, Dolphin Yard commercial yard to the east and residential dwellings to the north and east. The proposed mixed residential use of Flats and HMO therefore fits well with its robust edge of commercial location.
- 22.0. Whilst the front façade of the building is quite striking, the rest of the building behind is of basic plain construction with the interior likewise being very plain and unornamented.
- 23.0. No. 2 comprising the former hall double-height space and kitchens and wcs in the flat roofed single storey buildings to the rear, has a floor area of 68m². This part of the building is proposed to be converted to two one bedroomed flats as its current layout lends itself to this type of accommodation.
- 24.0. No. 3, has a double frontage and is a robustly constructed building already divided into office rooms that will be retained. It is two rooms deep each side, over two floors with a lower ground floor all on the same floor plan. The roofspace within the attic is high and spans the entire width and depth of No. 3. The existing floor areas within No3 is 332m² (3,573 ft²) and with the attic space a further 73m² (785.8 ft²). This part of the building is proposed to be converted to a sui generis HMO. Stacking of like functions above each other has been paid careful attention and there will be a new ground floor deck between the bedrooms and the lower ground kitchen, dining and living room designed to meet acoustic requirements using either Able Acoustics' specification or an equivalent robust detail.
- 25.0. The building is in a sustainable location and, subject to other matters, is of a size, configuration and condition that is suitable for residential conversion in the manner proposed, thus according with Policy CS14: Housing Type and Size of the Local Plan Core Strategy (2014) and saved Policy H5: Increasing the Housing Stock by the Conversion of Existing Buildings of the Local Plan First Review (1994).
- 26.0. Gravesham Borough Council's Adopted Local Plan Policies (2014) provide for sustainable development, of which HMOs are a component part in delivering local housing provision.

27.0. Sustainable travel, car and cycle ownership and parking

- 28.0. The site is highly sustainable location within Gravesend Town Centre. Within a 2 minute radius of walking, are local shops selling a range of foods, takeaways, pubs and retail from Milton Road, to Queen Street and King Street. Within a 7 minute walking radius are local entertainment venues including The Woodville Halls Theatre and Cinema.
- 29.0. Gravesend's Garrick Street bus stops are a 6 minute walk away.
- 30.0. Gravesend mainline station is a 7 minute walk away (0.3 miles), equating to a 5 minute cycle ride and with links to the south coast and London.
- 31.0. Gravesend is situated on National Cycle Route 1 (from Dover to the Scottish Highlands) and is linked to the Cyclopark a 42 ha site purpose-built facility for cycling and other outdoor activities adjacent to the A2. Shorne Wood Country Park has a cycle route within it, as does Jeskyns Community Woodland to the south of the Town.
- 32.0. Space for 10 bicycles is provided to the rear of the building that is secure and weatherproof and easy to access through the front door, straight through to the rear garden.
- 33.0. Each new one-bedroomed flat will have space within for one or two bicycles to be stored inside.
- 34.0. Regarding vehicle use, Enterprise vehicle hire at Parrock Street is a 10 minute walk away and this company will also deliver its vehicles. Other vehicle hire companies exist locally. Being within the town centre there is a low expectation of car ownership with local services and entertainment
- 35.0. The former B1 office use, occupying the entire building comprising 2-3 Berkley Road, had a floor area of 332 m². At one car parking space per 20m², the expectation would have been a minimum of 17 spaces of on-street car parking requirement, more would have been expected on occasion arising from visits of staff from their other offices and visitors.
- 36.0. Maximum vehicle parking standards for Hotels, Motels, Boarding & Guest Houses are 1 space per 2 staff and 1 space per bedroom.³ This would entail 10 spaces for the 10 bedroomed sui generis accommodation (no staff) and 1 space for each flat, making a further 2 spaces to total 12 spaces, assuming a maximum case scenario: below the 17 notional spaces applied to the former use.
- 37.0. People renting rooms in HMO accommodation tend to stay for one or two years on average and most are either contract workers between to 3 to 12 months or as a first step in saving deposits for self-contained accommodation. There is traditionally low car ownership, typically one car per 3 or 4 residents.

² Kent Highway Authority Parking Standards 2021 and Adopted KMSP SPG4: Vehicle Parking Standards (July 2006)

³ Adopted KMSP SPG4: Vehicle Parking Standards (July 2006)

38.0.Sui Generis HMO standards for No. 3 Berkley Road

- 39.0. Of the 10 proposed bedrooms in the part of the building comprising No. 3 Berkley Road, all exceed 10m² floor area. In addition to the 10m²+ sleeping area, each room will have its own en-suite wc and shower room at 3m².
- 40.0. Gravesham Borough Council HMO standards seeks 10.22m² for double occupancy rooms, matching the National minimum standard⁴ size for a sleeping/ sitting room at 10.22m² (110ft²) for 2 persons.
- 41.0. The proposed rooms are for single occupancy and the measurements below exclude the en-suites in all rooms:-

Table 1: Schedule of room sizes (excluding floor areas of the individual en-suite bathrooms at a further approx. 3m ² per room)	
Room 1	10.22m ²
Room 2	10.29m ²
Room 3	10.15m ²
Room 4	10.70m ²
Room 5	10.71m ²
Room 6	10.94m ²
Room 7	10.83m ²
Room 8	10.94m ²
Room 9	12.21m ²
Room 10	10.15m ²

- 42.0. Shared communal areas within the lower ground floor comprising Kitchen, Breakfast, Living and Dining measure a total of 35.18m². It would be an open plan space, with access to the garden behind from existing external steps and from within the building where the layout would foster a ‘collegiate’ atmosphere.
- 43.0. The rear garden will be landscaped and will be accessed via the main route through the dwelling and the two points of access and exit from the two existing stairs at each side of the building leading up from the lower ground floor.

44.0. One bedroomed flat provision for 2 flats at No. 2 Berkley Road

- 45.0. No. 2 Berkley Road, the former Hall part of the building comprises a double-height space with no first floor or attic space and having later single storey flat roofed extensions for kitchen and wcs. Its existing ground floor area is 68m² (732ft²). These later single storey flat roofed extensions are proposed to be removed to make way for an external courtyard. This Hall part of the building is proposed to be converted to two one bedroomed flats of 40m² each.
- 46.0. The Gravesham Core Strategy was adopted in 2014. Its policies do not include the Nationally Described Space Standards brought out in 2015. Planning Practice Guidance and the Government’s Written Material Statement to Parliament dated 25

⁴ Ministry of Housing and Local Govt. ‘Houses in Multiple Occupation and residential property licensing reform Guidance for Local Housing Authorities’ published 2018

March 2015 state that “*decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy*”. A relevant current Local Plan policy for this metric therefore does not exist. The flats would be of a sufficient size for the double occupancy of future occupiers taking into account the more general design and amenity policies in the development plan for the area and in themselves would include all the amenities needed for day to day living (e.g. kitchen, shower etc). The internal ceiling heights, particularly for the upstairs flat would exceed the minimums, retaining the vaulted element and the flats and common area would be light and airy from the fine arched arts and crafts style windows retained in the original building. Two person occupancy of each flat would provide a balance of types of occupation in the proposed development.

47.0. The ground floor flat would have its own outside garden space at a depth of 3.6m and the width of the former Hall building at 4.3m to provide a private enclosed courtyard area, contiguous with garden sizes in this part of Berkley Road and the characteristics of this Conservation Area generally. With a total area of 15.48, it would exceed the Residential Guideline minimum of 10m². The one-bedroomed first floor flat is considered to not comprise family accommodation and so would not need immediate access to an outdoor space. Public open space is easily accessible from this location, including green spaces at the river’s edge a 6 minute walk away.

48.0. Energy Efficiency of No 2 – 3 Berkley Road

49.0. The current energy rating of this solid wall commercial building is EPC ‘F’. This will be significantly upgraded to an EPC rating of above ‘C’.

50.0. By comparison, 3 out of 4 dwellings in the UK have an EPC rating of ‘D’ or less, with the average Victorian aged dwelling being rated at ‘E’. The govt. is aiming for as many properties as possible to achieve an EPC rating of C by 2035¹.

I trust this information is sufficient to enable Gravesham Borough Council to grant planning permission for this proposal.

Please let me know should you require any further information or amendments.

Yours sincerely

C. B. Wright

Clare B. Wright MA GDip MRTPI
Chartered Town Planner
Director, C.B.Wright & Associates Ltd.



¹ <https://www.thisismoney.co.uk/money/mortgagehome/article-10191013/Britains-Victorian-housing-stock-values-plummet-government-introduces-EPC-regulation.html>