

105 Windmill Street

Gravesend

Kent

DA12 1BW

18th August 2022

The Planning Officer

Gravesham Borough Council

Civic Centre, Windmill Street,

Gravesend

DA12 1AU

Dear Sir/Madam,

Planning Application 196/197 Parrock Street DA12 1EW

This letter addresses the response of the Conservation Officer to the pre-planning application and the planning application itself.

Building Control Approval

Although formal Building Control approval has not been applied for, drawings have been submitted to them and consultations held, both on the phone and in person. We have amended the design accordingly and believe that design submitted will meet their requirements.

Steps to the Basement

Since this design was carried out, the steps outside 195 Parrock Street have been unearthed and we acknowledge the possibility, indeed probability, that similar steps to 196 are still in place. These will have to be carefully excavated as stated. Depending on their position and layout they may, or may not, serve as access to the basement flat. So an alternative access will have to be created, perhaps from 197 Parrock Street.

Layout of Top Two Floors

Three options were considered in detail. The option submitted is for one flat on each floor and has the following attributes:

- It avoids partitioning or closing off of the stairs below second floor level, so there is no loss of light to the stairwell and no partitioning off of the original banister.

- The second floor flat has a floor area of 35m² (including the cupboard under the stairs but excluding the chimney breasts). Although this is below the recommended minimum of 37m², it does have good flow, three large windows and in our opinion is a more workable and pleasing space than many flats which exceed the minimum floor area. It would also have the use of a room off the landing (not included in the floor area) recently used as a w.c., which will be plumbed for a washing machine or may alternatively simply be used for storage.
- If the two floors were combined into a single flat, the top front room would be a bedroom and the added benefit of a gallery to a bedroom would not warrant the expense. The dormer window would then open into the ceiling void and offer no benefit to the occupants.

But our primary concern about a single flat spanning the top two floors is the limited range of tenants or owner/occupiers to whom it would appeal. In our experience as developers, second floor flats of two or more bedrooms in buildings without lifts do not appeal to first time buyers starting a family and tend to be purchased by landlords.

As landlords ourselves we have experience of owning such a flat, also in a town centre listed building without outdoor space. The current Benefits System allows tenants to enjoy enhanced cash flow if they choose to live in properties with less than the prescribed number of rooms for their family size. On routine inspections we have too often had to take action on more people living in the property than what we were told, the living rooms filled with beds, buggies left on the stairs, obstructed fire exits and general discord which distracts from the appeal to other tenants – as well as placing greater stress on our listed building. We would guard against owning such a flat in the future.

We consider the proposed scheme the best for the preservation, use and enjoyment of this unique building and hope you will concur with our views.

Yours faithfully

Donald Holden