

25 July 2025



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Dear Sir / Madam,

APPLICATION FOR PLANNING PERMISSION TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) TOWN AND COUNTRY PLANNING ACT 1990 AT 44-46 THE GROVE, GRAVESEND, KENT, DA12 1DF

We are instructed on behalf of our client, Substantia Capital, to submit a full planning application in respect of proposals for 44-46 The Grove, Gravesend, Kent, DA12 1DF.

The description of development for the full-planning application is as follows:

“Erection of a single-storey upwards extension to provide six residential units and associated works.”

The application has been submitted electronically over the Planning Portal (PP-14031657) and is comprised of the following information:

- This Cover Letter (Savills)
- Completed Application Form and Certificates (Savills);
- Daylight & Sunlight Assessment for Neighbouring Properties (Ecolytik);
- Daylight & Sunlight Note for the Proposed Scheme (Ecolytik);
- Design and Access Statement (Hollaway Studio);
- Noise Technical Note and Noise Impact Assessment (KP Acoustics);
- Transport Statement (Evoke Transport); and
- Drawings, prepared by Hollway Studio, as follows:

Drawing Reference	Drawing Title	Scale
100.001	Site Location Plan	1:1250
100.003	Existing and Proposed Block Plan	1:200
100.002	Existing Site Plan	1:100
200.002	Proposed Site Plan	1:100
100.010	Existing Lower Ground Floor Plan	1:100
200.010	Proposed Lower Ground Floor Plan	1:100
100.015	Existing Fourth Floor Plan	1:100
200.015	Proposed Fourth Floor Plan	1:100
100.016	Existing Roof Plan	1:100
200.016	Proposed Roof Plan	1:100
100.020	Existing Elevations	1:100
200.020	Proposed Elevations	1:100
100.030	Existing Sections	1:100
200.030	Proposed Sections	1:100

1. Site Description and Context

The application site is located in central Gravesend and comprises a broadly T-shaped parcel of land which

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to the front provides pedestrian access from The Grove and to the rear, vehicular access from Edwin Street. The site comprises of a part 4, part 5 storey building which lies to the west side of The Grove, approximately 60m to the south of the junction with Milton Road.

The site has historically been in lawful Class E use, having been in use as a job centre and offices, as confirmed in respect of the site's planning history (ref: 20210256 & 20210291). At the time of writing this letter, the building is being converted to residential use following the grant of prior approval under ref: 20240942. Prior approval was granted on 9 December 2024 for the change of use of the existing building from office use (Class E) to 37 residential units (Class C3) under Part 3, Schedule 2, Class MA of the General Permitted Development (England) Order 2015 (GDPO).

The site is located within walking distance of a range of services and amenities found within Gravesend Town Centre. The site is located approximately 500m east of Gravesend Railway Station and is within walking distance of numerous bus stops, providing transport connections in the area.

The site is not statutorily or locally listed, and not within a conservation area. The site is located within Flood Zone 1 and therefore considered at low risk of flooding.

2. The Proposed Development

The proposed development comprises the erection of a single-storey mansard style roof extension to provide six residential units at the property. The six residential units will comprise four 1 bedroom 1 person units and two 2 bedroom 3 person units.

Private outdoor amenity space is integrated through the provision of recessed balconies set under dormer style window openings.

The proposed mansard roof extension will be clad with zinc cladding to provide a high-quality, contemporary addition to the building, as shown in Figure 1 below.

The provision of cycle parking and waste storage facilities will be provided at ground floor / basement level, providing appropriate provision for the proposed units as well as the consented and under construction 37 units within the existing building.



Figure 1 – Proposed North and South Facing Elevations (Hollaway Studios, 2025).

3. Planning Policy

Planning law requires that where regard is to be had to the development plan for the purpose of any determination made under the Planning Acts, the determination must be made in accordance with the development plan unless material considerations indicate otherwise¹. The Development Plan for Gravesham currently comprises:

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004

- Gravesham Local Plan Core Strategy and Policies Map (September 2014);
- Saved policies in the Gravesham Local Plan First Review (November 1994); and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

Gravesham Borough Council are currently in the process of reviewing its Local Plan to address the borough's development needs up to 2037. The Gravesham Local Development Scheme (published in March 2025) sets out that Regulation 19 consultation is due to take place in July 2025 with the intent to submit the emerging local plan to the Secretary of State in December 2025.

The Local Plan is supported by the Policies Map, as shown in Figure 2, which demonstrates that the site is subject the following designations:

- Site located in Gravesham Town Centre
- Situated within an Opportunity Area (CS03-CS06)
- Adjacent to boundary for Crossrail Safeguarding (CS11)
- Located in a region where change of use to Offices is deemed acceptable (E5)



Figure 2 – Policies Map (September 2014)

4. Planning Assessment

Principle of Development

Policy CS02 of the Core Strategy (2014) sets out that the plan will prioritise development in the urban area as a sustainable location for development. Paragraph 124 of the National Planning Policy Framework (NPPF) states that planning decisions should promote the 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. In addition, Paragraph 125 (e) of the NPPF states that planning decisions should support opportunities to use the airspace above existing residential and commercial premises for new homes, in particular they should allow upwards extensions, including mansard roofs. It is considered that the proposed upwards extension would prioritise housing delivery to the urban area and make effective use of land and airspace for meeting the needs of homes.

Paragraph 78 of the NPPF requires local planning authorities to add an additional 5% buffer to their housing need figure over the five-year period to ensure choice and competition in the market for land. Paragraph 78 of sets out for local authorities where there has been significant under-delivery in the last 3 years, this buffer is to be increased to 20% to improve the prospect of achieving the planned supply. The Five-Year Land Supply Statement 2024-2029 (February 2025) sets out that against a need of 1,789 dwellings, 1,056 dwellings were delivered in the Borough which results in a Housing Delivery Test 2023 measurement of 59%. As a result, a 20% buffer needs to be applied to Gravesham's housing need figure, and the presumption in favour of sustainable development is engaged. This presumption in favour of development further supports the principle of delivering residential accommodation on the site.

As the site is located in the urban area, an opportunity area and located close to public transport and Gravesend Town Centre, it is considered that there the principle for residential use accommodated within an upwards extension is established and acceptable, aligning with Policy CS02 of the Core Strategy and Paragraphs 124 and 125 of the NPPF.

Unit Mix

In regard to unit mix, Policy CS14 which requires development to offer a range of dwelling sizes. The proposed development will provide six residential units comprising of 4 x 1b1p studio units and 2 x 2b3p units. It is considered that that this provides a range of dwelling sizes suitable to the scale and location of proposed development within the Town Centre, aligning with Policy CS14 of the Core Strategy.

Design

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

A Design and Access Statement, prepared by Hollway Studios, accompanies this letter and provides full details of the proposed design. This letter should be read alongside the submitted Design and Access Statement.

The proposed development seeks to erect a single storey upwards extension which would extend the building to five storeys in height. The surrounding area comprises buildings of height varying from two to five storeys. It is noted that Stephenson House at 7-10 The Grove gained full-planning permission on 31/07/2015 (ref: 20150454) for *"Erection of a single storey roof extension to create 5no. self-contained flats."* This consent has since been implemented and is located across the road from Heron House. Therefore, buildings comprising of five storeys in height are found within the immediate vicinity of the site and therefore an additional storey will not result in a building height which is uncharacteristic or inappropriate in the wider area. It is considered that the proposed development will make effective use of land and use of airspace above an existing building in accordance with Paragraphs 124 and 125 of the NPPF.

The proposed upwards extension will form a 'mansard style' roof extension with sloping roofs to the front and rear providing visual relief from the wider streetscene and creating a subordinate addition to the existing building. The extension will be clad in zinc metal cladding to create a high-quality, contemporary addition to the building which will enhance the appearance of the building.

Taking into account the proposed extensions, height, massing and materiality, it is considered that the proposed development is well designed and respects the character and appearance of the surrounding area, in accordance with Policy CS19 of the Core Strategy 2014.

Heritage

Policy CS20 states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place.

The site is close to the Harmer Street Conservation Area to the north and the King Street Conservation area to the north and west.

The Harmer Street Conservation Area was designated on 16th January 1970 by Kent County Council and extended on 17th May 1990 by Gravesham Borough Council. The Conservation Area's boundary contains the historic thoroughfare of Harmer Street, Berkley Crescent and part of Milton Road in the south, and part of The Terrace in the north. Harmer Street was not established until the early 19th century, before which the area had been part of the open fields of Milton-next-Gravesend. The principal landmarks in the Harmer Street Conservation Area are:

- The clock tower;

- The (former) post office;
- No.146 Milton Road (former bank);
- The Call Boy Public House;
- No.1a to 1e Harmer Street;
- No.39 The Terrace.

These landmark buildings, as identified above, are linked by groups of buildings (both sides of Harmer Street and nos. 1 to 9 Berkley Crescent), providing focal points between them. The site forms part of the setting of the Conservation Area and several of the above landmarks.

The King Street Conservation Area encompasses much of the 18th and 19th century commercial expansion of Gravesend. It is focused on the central east-west highway of New Road, King Street and Milton Road that was firmly established when New Road was laid in 1801, as part of a stagecoach route to London via Northfleet. The streets are lined with commercial buildings, most of them ground floor shops and accommodation above, interspersed with civic buildings and some residential houses.

It is considered that the proposed upwards extension would be appropriate in the setting of the Conservation Areas, replicating similar developments found in the immediate vicinity of the site, notably Stephenson House. In regard to the proposed materiality, the external metal cladding adopts a grey colour to complement the slate grey roofs in the area.

It is considered therefore that the proposed development accords with Policy CS20.

Residential Amenity

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users (Paragraph 135 (f)). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy (2014), which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

The proposed units will meet the nationally described space standards and benefit from generously sized windows to provide high-quality residential accommodation. A daylight sunlight note, prepared by Ecolytik, accompanies this letter and sets out that units will benefit from sufficient levels of daylight as the new upper storey is positioned above the surrounding built context and, as such, the windows serving the proposed dwellings would be entirely unobstructed by neighbouring structures. Given their elevated location and lack of any immediate obstructions to the sky, it is considered that the new habitable rooms will meet the daylight and sunlight targets, in a similar manner to all habitable rooms on the lower floors consented under prior approval.

A Noise Technical Note accompanies this application and demonstrates that the proposed units would have acceptable internal noise levels during daytime and nighttime scenarios provided that suitable glazing specification as outlined in the Note is provided. Therefore, it is considered the proposed units would not suffer from adverse noise impacts.

In regard to private outdoor amenity space, SPG2 Residential layout guidelines (2020) sets out that for self-contained units which have two or more bedrooms and are capable of providing family accommodation, an area of amenity space in excess of 10 sq. metres will be expected. There is no guidance requiring amenity space provision for one bedroom units. The proposed development integrates private amenity space for each residential unit in the form of balconies between 5-7 sq.m. in size. In regard to 1 bedroom units, the provision of private amenity space is in surplus to local guidance which does not require private amenity space for 1 bedroom units. In regard to 2 bedroom units, it is acknowledged that the units will benefit from balconies of 7 sq.m., rather than 10 sq.m expected under SPG2 (2020). It is considered this is a minor reduction on local guidance is acceptable given the constrained nature of the development being restricted to within the current footprint of the building. While these balconies could be increased in size for 2 bedroom units, this would compromise the ability to deliver private amenity space for 1 bedroom units. Therefore, on balance it is considered that the private amenity space provision is acceptable within the proposed development.

Neighboring Amenity

Policy CS19 of the Core Strategy (2014), which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

No windows are proposed on side elevations which immediately adjoin neighboring properties. Windows are proposed to the front and the rear, mirroring the existing situation found on site. Balconies will be adequately screening by virtue of the mansard roof extension forming hard barriers at either ends of each balcony, as a result, it is considered that the proposed development would not result in any reductions in privacy of neighboring properties or land.

A daylight sunlight assessment, prepared by Ecolytik, accompanies this application and has assessed the impacts of the upwards extension on neighboring properties. The assessment sets out that an analysis has been carried out on the closest neighbouring buildings to the application site. The assessment results demonstrate that all windows, rooms and amenity spaces of neighbouring properties will receive satisfactory levels of daylight and sunlight in line with BRE's guidelines. Therefore, it is considered that the proposed development will have an acceptable impact on neighbouring properties and accords with Policy CS19.

Transport and Highways

The maximum vehicle and minimum cycle parking standards for residential developments within Gravesham are outlined in the Kent County Council SPG4 Parking Standards Guidance (2006).

The building is currently accessed by vehicle via an existing access road off Edwin Street to the rear of the property. This vehicular entrance will be maintained following the conversion of the building, ensuring that the site will be accessed safely in line with the existing arrangements.

A Transport Note, prepared by Evoke Transport, accompanies this application and sets out the proposed development will be supported by 22 car parking spaces, equating to a parking ratio of 0.59 spaces per unit. Notably this parking ratio is marginally in excess of the Census car ownership data which shows an average of 0.53 cars per household for flats in the area, equating to a parking demand of 20 vehicles. The proposed provision of 22 car parking spaces is therefore broadly in accordance with the average car ownership of existing residents living within the vicinity of the site. As such, this provision is suitable to accommodate the anticipated vehicles to be generated by the proposed development whilst providing two additional spaces to accommodate visitors and any additional demand. This reduced provision compared with the adopted parking standards and the previously approved ratio of 0.71 spaces per unit which was accepted by the Local Authority due to the sustainable location of the site. The proposed parking provision is therefore considered suitable for the proposed development quantum, in accordance with Census car ownership data. The under-provision compared to adopted standards and previously approved parking ratio is reflective of the sustainable location of the site in accordance with key objectives of national and local policy and guidance.

The Kent County Council SPG4 Parking Standards Guidance (2006) state that one cycle parking space per unit should be provided for flats. As such it is considered that a total of 37 cycle parking spaces should be provided at the site. A total of 44 cycle parking spaces are currently proposed at basement level with 22 Sheffield Stands (44 spaces) provided. The cycle parking is accessible via the ramp to the rear off Edwin Street or via the lifts. All cycle parking is secure, sheltered and safely accessible.

Refuse and recycling stores are proposed at lower ground floor level of the proposed development and will be managed by the in house building management team. An area has been identified for the storage of bins for before and after collection and building management will return bins to the storage at lower ground floor level following collection.

In accordance with Paragraph 109 of the NPPF the site offers a genuine choice of transport modes including more sustainable modes of transport such as cycling through the provision of secure and sheltered cycle parking.

BNG

In regard to BNG, The Environment Act 2021 require development proposals to deliver a net gain in biodiversity following a mitigation hierarchy which is focused on avoiding ecological harm over minimising, rectifying, reducing and then off-setting.

It is considered that the proposed development is exempt from biodiversity net gain requirements as the application will not impact a priority habitat and impacts less than 25 sq.m. of on-site habitat and less than 5.0m of on-site linear habitats.

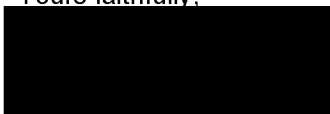
5. Summary

In summary, as the site is located in the urban area, an opportunity area and located close to public transport and Gravesend Town Centre, it is considered that the site is suitable for a single storey upwards extension to deliver further residential units and make effective use of brownfield land in a sustainable location. The application will enable the delivery of a further 6 residential units, in addition to 37 units previously approved under prior approval on the site, making a valuable contribution to delivery of housing in the Borough. In addition, the proposed upwards extension will be of a high-quality design which will enhance the existing building and wider area.

The relevant technical and environmental matters have been appropriately addressed, particularly in relation to heritage and impact on neighbouring amenity. Therefore, for the reasons set out in this statement and in the documents supporting this planning application, we request Gravesham Borough Council to consider these development proposals favourably and to grant planning permission.

We trust you have all the relevant information to register and validate this application. We would be grateful if you could acknowledge receipt of this application.

Yours faithfully,



Ben Tattersall MRTPI
Associate