



Delegated Report

Full Planning Application

Application No:	20221183
Location:	Joynes House, New Road, Gravesend, Kent, DA11 0AJ
Description:	**REVISED DESCRIPTION** Proposed external alterations to existing building facade including new windows, aluminium infill panels and infill glazing to lower ground floor. Relocation of existing entrance and lobby from ground floor to lower ground floor and minor amendments to internal layout of 2 no. ground floor residential units consented under reference 20210958, as amended by non-material amendment ref 20220391.
Applicant:	Mr Greg Kuzdenyi, Joynes House Development Limited
Site Visit:	N/A Desktop Assessment

Submitted Documents/Plans

- Application Form - dated 31/10/2022;
- Covering Letter - dated 30/10/2022;
- Planning Statement - dated 09/2022;
- Fire Statement - dated 13/03/2023;
- Drawing no. 001 - Rev. A - Existing Site Plan / Parking Plan - received 07/11/2022;
- Drawing no. 001 - Rev. B - Proposed Elevations - received 20/04/2023;
- Drawing no. 002 - Rev. B - Proposed Elevations - received 20/04/2023;
- Drawing no. 003 - Rev. B - Lower Ground Floor Plan - received 20/04/2023;
- Drawing no. 004 - Rev. A - Proposed Block and Site Location Plan - received 07/11/2022;
- Drawing no. 005 - Rev. A - NMA for 20210958 Ground Floor Plan - received 07/11/2022;
- Drawing no. 009 - Rev. A - Existing South Elevation - received 07/11/2022;
- Drawing no. 010 - Rev. A - Existing North Elevation - received 07/11/2022;
- Drawing no. 011 - Rev. A - Existing East and West Elevation - received 07/11/2022.
- ~~Drawing no. 001 - Rev. A - Proposed Elevations - received 07/11/2022 - SUPERSEDED;~~
- ~~Drawing no. 002 - Rev. A - Proposed Elevations - received 07/11/2022 - SUPERSEDED;~~
- ~~Drawing no. 003 - Rev. A - Lower Ground Floor Plan received 07/11/2022 - SUPERSEDED;~~
- ~~Drawing no. 001 - Rev. A - Proposed Elevations - received 27/03/2023 - SUPERSEDED.~~

Preliminary Matters

The proposed materials and cladding were changed during the application process, with timber cladding removed and replaced by aluminium infill panels. Therefore, the original description was incorrect. The Local Planning Authority amended the description, removing 'cladding' and including 'aluminium infill panels' to read as follows:

****REVISED DESCRIPTION****

Proposed external alterations to existing building facade including new windows, aluminium infill panels and infill glazing to lower ground floor. Relocation of existing entrance and lobby from ground floor to lower ground floor and minor amendments to internal layout of 2 no. ground floor residential units consented under reference 20210958, as amended by non-material amendment ref 20220391.

Relevant Planning History

Reference	Description	Decision	Decision Date
20221111	Application for prior approval under Part 20 Class AA of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for upward extension of existing commercial building through the construction of 2 additional storey to provide 24no. flats along with necessary ancillary works.	PRIOR APPROVAL IS REQUIRED AND APPROVED	02.12.2022
20220799	Application for prior approval under Part 20 Class AA of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) for upward extension of existing commercial building through the construction of 2 additional storey to provide 24no. flats along with necessary ancillary works.	PRIOR APPROVAL IS REQUIRED AND REFUSED	23.09.2022
20220392	Application for non-material amendment to planning permission reference number 20210962 to allow minor amendments to the internal layout.	PERMITTED NON MATERIAL AMENDMENT	20.04.2022
20220391	Application for non-material amendment to planning permission reference number 20210958 to allow minor amendments to the internal layout.	PERMITTED NON MATERIAL AMENDMENT	20.04.2022
20220390	Application for non-material amendment to planning permission reference number 20210974 to allow minor amendments to the internal layout.	PERMITTED NON MATERIAL AMENDMENT	20.04.2022
20210974	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part Ground, First and Second Floors from Class E (previously Class B1(a)) (offices) to 26 residential units (Class C3 (dwellinghouses)).	PRIOR APPROVAL IS REQUIRED AND APPROVED	16.09.2021
20210973	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part First, Second and Fourth Floors from Class E (previously Class B1(a)) (offices) to 22 residential units (Class C3 (dwellinghouses)).	PRIOR APPROVAL IS REQUIRED AND APPROVED	16.09.2021

20210962	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 third floor from Class E (previously Class B1(a)) (offices) to 13 residential units (Class C3 (dwellinghouses)).	PRIOR APPROVAL IS REQUIRED AND APPROVED	16.09.2021
20210958	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class O 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 of Part Ground Floor from Class E (previously Class B1(a)) (offices) to 4 residential units (Class C3 (dwellinghouses)).	PRIOR APPROVAL IS REQUIRED AND APPROVED	16.09.2021
TH2/71/82B1	Detailed plans of office block.	APPROVED	24.01.1973
TH/2/71/82B	Detailed plans of office block.	APPROVED	12.10.1972
TH2/71/82A	Outline application for the erection of office block of 51,280 sq.ft. and erection of dwellings.	CONDITIONAL PERMISSION	31.05.1972
TH2/71/112	Outline application for the erection of an office block, flats and houses on sites of 1, 2, 3, 4 New Road, 2A St. James' Road, St. James' Church and Darnley Road.	PERMISSION	21.12.1971

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale & Distribution of Development
- CS12 - Green Infrastructure
- CS18 - Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 - Vehicle Parking Standards

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- Section 2 - Achieving Sustainable Development
- Section 12 - Achieving Well-Designed Places

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 - amended June 2020
- Technical Housing Standards - Nationally Described Space Standard (2015)
- SPG 4 - KCC Parking Standards (2006)

Consultations, Publicity and Representations

Internal Consultees

GBC Regulatory Services (Environmental Protection) - No objection to this application. The conditions and informatives placed on the 20210958 application should be re-iterated.

Local Ward Councillors - No comment received.

External Consultees

Health and Safety Executive - Fire Safety and Planning -

Initial Consultation (07/02/2023) - I have reviewed this case and as it's a full planning application for a residential building over 18 metres a fire statement is required. The issue around cladding must be dealt with at the planning stage as this could potentially affect the appearance of the building.

Therefore, could you please provide a completed fire statement form. The fire statement form must be for the purposes of planning gateway one (and therefore on the correct template) and should not be confused with fire strategy / statement for the London Plan Policy.

We will close this consultation and provide a response once the form has been submitted with a new consultation request.

Secondary Consultation (26/04/2023) - HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

"Dwellings" includes flats, and "educational accommodation" means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application, it does not appear to fall under the remit of planning gateway one because it does not meet the height requirement.

Further information is available on the HSE website here.

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-3037) in all future correspondence

Neighbouring properties

Sixty surrounding properties were consulted and no representations were received. The consultation period expired 16th February 2023.

Officer's Analysis

Joynes House is a five storey purpose-built office block, constructed in the 1970s. It is located within Gravesend Town Centre, on the corner of Darnley Road and New Road.



The building benefits from prior approval consents for conversion into 65 residential units (20210974 / 20210962 / 20210973 / 20210958) and subsequent non-material amendments to the internal layouts (20220390 / 2022391 / 2022392 / 2022393). In addition, a separate prior approval has been granted (ref. 20221111), under Class AA (Part 20) of the GPDO, for an upward extension accommodating 24 residential units.

This application seeks planning permission for the proposed external alterations to the existing building (new windows, aluminium infill panels and infill glazing), the relocation of the entrance lobby, landscaping works and minor internal alterations to the ground floor residential units.

Design, Character and Appearance

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive, fit for purpose and locally distinctive. It also seeks to conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area, whilst ensuring that the design, layout and form of new development will be derived from a robust analysis of local context and character and make a positive contribution to the street scene, the quality of the public realm and the character of the area.

This application proposes the replacement of windows and frames, alteration of the entrance into the building, introduction of windows/infill glazing on the ground floor, as well as installation of new aluminium infill panels. The replacement windows and frames would be dark grey aluminium to meet current standards, this is not considered to impact on the external facing appearance of the building nor harm the character of the street scene. The existing window frames, as existing, are a dark grey frame and therefore it would not be a noticeable change.

The existing pedestrian entrance into the building is via the ground floor, accessed by steps up from the pavement level. As part of this application the entrance would be changed, with pedestrians accessing the building into the lower ground floor, level with the pavement. The existing steps up to the ground floor will be removed, some of the front boundary wall and railings will be reinstated and the landscaping along the

frontage will be retained. This is considered to be acceptable and will not harm the street scene nor have any significant impact on the appearance of the building.

The installation of new windows on the lower ground floor level, to the eastern side of the building, would be a material change to the buildings appearance. Currently, the lower ground level is used for vehicular parking and is an open area. However, the change to the appearance of the building by introducing windows and frames to this section of the building is not considered to be harmful or have any negative impact on the character of the street scene. There would be conditions attached to the decision notice to ensure that the windows and frames installed on the lower ground level match those using in the rest of the building to maintain a good visual relationship.

In terms of the cladding, the proposal seeks to install dark grey aluminium infill panels, which would be installed over the existing windows that are not required. The dark grey colour infill panels match the new windows, with a colouration that fits and compliments the existing red brickwork on the building. As such, the proposed panelling is considered to be acceptable in terms of colour and would be appropriate for the external façade, complimenting the existing colouration on the building. This would not impact on the character of the street scene.

Overall, the proposed external alterations to the property would not impact on the character or appearance of the street scene or the appearance of the building. Therefore, the application is in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2021).

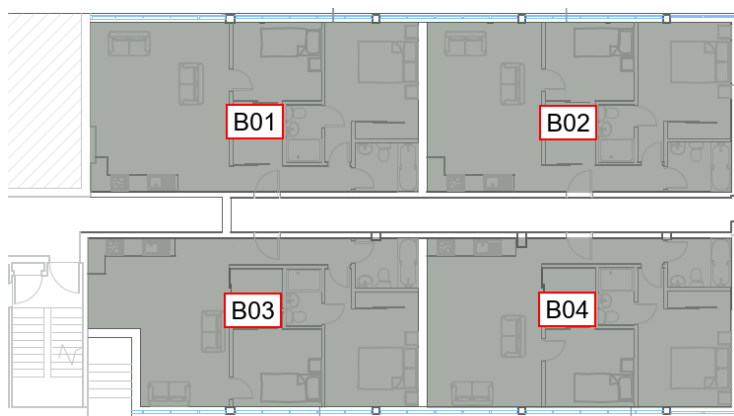
Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England, the Nationally Described Space Standards (NDSS) (2015) and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

This application proposes an alteration to the internal layout on the ground floor of the building. The layout was approved in the Prior Approval application (ref. 20210958) and related to the eastern side of the ground floor with no.4 flats, consisting of 2 x 1 person studio flats, 1 x 2 person flat and 1 x 3 person flat. The approved layout is shown in the screenshot below:



The proposed layout would provide 3 x 3 person units by increasing the floor area for residential units on the floor. The existing circulation space afforded for the entrance will be removed by virtue of the relocation of the entrance into the lower ground floor level. The proposed layout is shown in the screenshot below:



The NDSS (2015) sets out minimum gross floor areas for a 1 storey, 2 bedroom dwelling. These figures vary depending on the number of persons occupying the dwelling. In this case all of the units have a double bedroom and single bedroom, with a maximum capacity of 3 persons. Therefore, the flats should be assessed against the 61m² minimum floor area for 3 person units.

Flat	National Housing Standard Guidance	Unit Floor space
B01	61m ²	65m ²
B02	61m ²	61m ²
B03	61m ²	61m ²
B04	61m ²	61m ²

The table demonstrates that all of the units provided would comply with the minimum floor space in the NDSS (2015) and provide acceptable living conditions. However, Gravesham's RLG (2020) breaks down the measurements further, recommending minimum floor areas for specific rooms. These recommended floor areas have been compared to the proposed room sizes within each flat unit, as shown in the table below.

	RLG (minimum floor area)	B01 Room Size(s)	B02 Room Size(s)	B03 Room Size(s)	B04 Room Size(s)
Kitchen/Living/Diner	25.2m ²	27.65m ²	24.65m ²	24.95m ²	24.6m ²
Double Bedroom	11.5m ²	13.5m ²	13.35m ²	13.35m ²	13.4m ²
Single Bedroom	7.5 m ²	9.15m ²	9.2m ²	9.05m ²	9.05m ²
Bathroom	3.6m ²	3.65m ²	3.65m ²	3.65m ²	3.65m ²
Ensuite	3.6m ²	2.35m ²	2.3m ²	2.35m ²	2.35m ²

Table 2 has been colour coded (green complies / red fails) to show which rooms within the dwelling meet the guidance within the RLG. The table demonstrates that a number of rooms within the flats fail to comply with the minimum standards. However, the bathrooms that fall below the minimum recommendation are shower rooms and as a shower basin requires less space than a bath, these rooms are considered acceptable in terms of floor area.

The undersized kitchen/living/diners in units B02, B03 and B04 are not significantly below the minimum guidance and are served by relatively large storage cupboards, which could be considered part of the overall floor area. Moreover, the flats accord with the national space standards. Therefore, on balance, the proposed flats would provide adequate living environments for future occupiers in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2021).

Neighbouring Amenity

Policy CS19 (LPCS) seeks to protect amenity and ensure acceptable future living conditions. Section 12 of the NPPF (2021) also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings”.

The proposed changes to Joynes House as part of this application will not materially impact the amenity of any adjoining residential properties. There is no extension proposed and the only external alteration would be the cladding. As such, the development is considered to safeguard the amenity of adjoining occupiers in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2021).

Parking and Highways

There are no parking or highways issues related to this proposal. Although the development will reduce the number of parking spaces on the lower ground floor level of the building, in order to facilitate the new entrance lobby lounge, office space and cycle store, there will be some parking retained internally and a number of spaces outside.

However, the loss of parking is not considered to be an issue given that the site lies on the western edge of the town centre within the urban area of Gravesend and as such it is in a sustainable location with good access to public transport links. Moreover, the proposed cycle store is large and would provide more than adequate space for bicycle parking for future residents. Therefore, the building would retain adequate vehicular parking for its edge of centre location and provide sufficient cycle parking in accordance with highway policy.

Any Other Material Planning Considerations

Fire Risk & Safety - The application, as originally submitted, proposed the installation of timber cladding panels onto the external elevations of the building. The overall height of the building and proposed cladding were deemed appropriate to consult HSE Fire Safety and Planning, who initially requested the submission of a fire statement.

The agent was contacted regarding this matter and revised plans and a fire statement were submitted to the Local Planning Authority. The revised plans removed the timber cladding panels and replaced them with aluminium infill panels on the windows, due to concerns with fire regulations.

HSE were reconsulted and did not consider the building to meet the remit for planning gateway one, contrary to their earlier representation. As such, the change of materials and comment from HSE are deemed acceptable in relation to fire safety, with other matters controlled by Building Regulations.

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

The proposed external alterations to the building would not harm or alter its appearance, nor impact the character of the street scene. The new entrance would improve accessibility and the internal alterations provide acceptable living conditions for future occupiers. There is no impact on the amenity of surrounding residents or parking provision.

As such, it is recommended that planning permission is granted subject to conditions.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	02 May 2023	Dated:	03 May 2023