



Delegated Report

Minor Material Amendment

Planning Application No: 20241034

Location: 14 Royal Pier Road Gravesend Kent DA12 2BD

Description: Application for variation of condition 2 attached to planning permission reference 20221075 for Internal alterations & external including a front roof dormer access alterations all to convert existing lower ground floor flat and house above into three flats including 2 x 1 bed flats and 1 x 2 bed flat; to omit the dormer roof windows and replace with velux conservation windows to the rear and dormer window to the front roof slope, with internal alterations to remove bathroom and enlarge bedroom.

Applicant: Mr Onk Pardesi

Site Visit Date: 28/11/24

Submitted Documents/Plans

Application Form
2039-210 Rev E – Proposed First and Second Floor Plan
2039-220 Rev D – Proposed Roof Plan
2039-230 Rev B – Proposed Front Elevation 1
2039-240 Rev C – Proposed Front Elevation 2
2039-250 Rev D – Proposed Rear Elevation 3
2039-260 Rev B – Proposed Side Elevation 4
2039-270 Rev B – Proposed Side Elevation 5

Superseded Plans:

~~2039-210 Rev D – Proposed First and Second Floor Plan~~
~~2039-220 Rev C – Proposed Roof Plan~~
~~2039-230 Rev A – Proposed Front Elevation 1~~
~~2039-240 Rev B – Proposed Front Elevation 2~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20221075	Internal alterations & external including a front roof dormer access alterations all to convert existing lower ground floor flat and house above into three flats including 2 x 1 bed flats and 1 x 2 bed flat.	Permitted	11.01.2023

Other relevant local planning history:

It is noted that, based on aerial views and historic maps that the front dormer extensions at no.s 6 and 10 Royal Pier Road appeared at different times. The front dormer at number 6 appeared sometime between 1960 and 1990. The front dormer at number 10 appears between 1990 and 1999. No planning permission

records are available for these developments. However, planning policies since have changed substantially and such development at that time may have not required planning consent. Given their historic nature, they are not material planning considerations or justifications.

It is noted that 11 Royal Pier Road had planning consent in 2002 for '*Construction of dormer windows in the front and rear roof slopes and conversion of the roof space into a bedroom*' under ref 20020717. However, this permission was never implemented.

Number 12 sought planning permission for 'Construction of a dormer extension in the rear roof slope and velux window in the front roof slope and conversion of the roof space into habitable rooms' in 2018 under ref 20181052. However, this was refused.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS10 – Physical and Social Infrastructure
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- P5 – Change of Use of Building and Vehicle Parking Standards
- TC3 – Development affecting Conservation Areas
- H5 – Conversion of Existing Buildings

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision Making
- Section 5 - Delivering a Sufficient Supply of Homes
- Section 6 – Building a strong, competitive economy
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving sustainable development and well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Planning (Listed Building and Conservation Areas) Act (1990)

- Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesend Riverside Conservation Area Appraisal (2009)
- Management Plan – Gravesend Town Centre Conservation Areas

Consultations, Publicity and Representations

Consultees

Ward Councillors: No responses received.

Neighbouring properties

12 surrounding properties were consulted and a site notice placed on 28/11/24. The final date to submit comments ended on 20/12/24. 0 comments were received from members of the public.

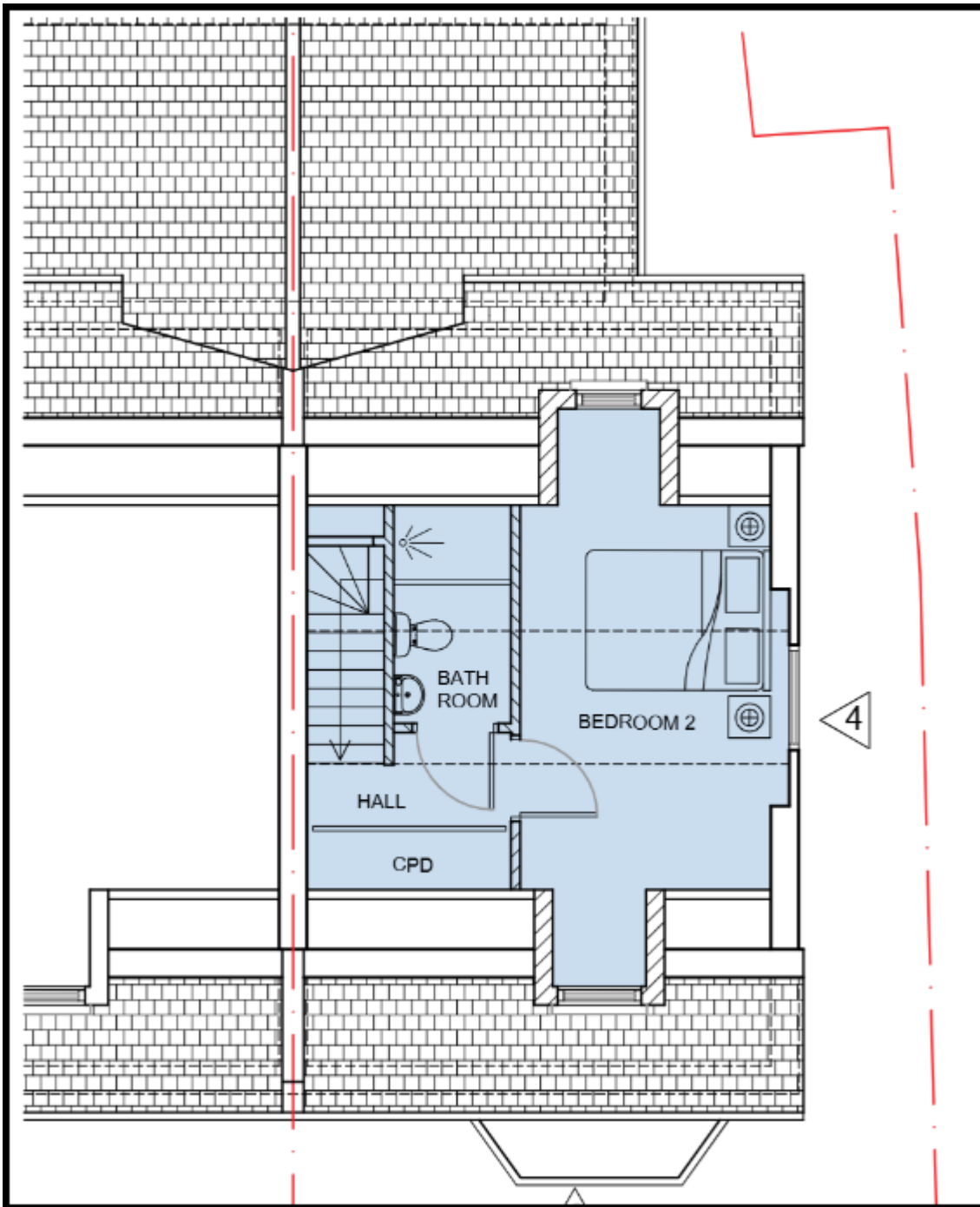
Officer's Analysis

Proposal

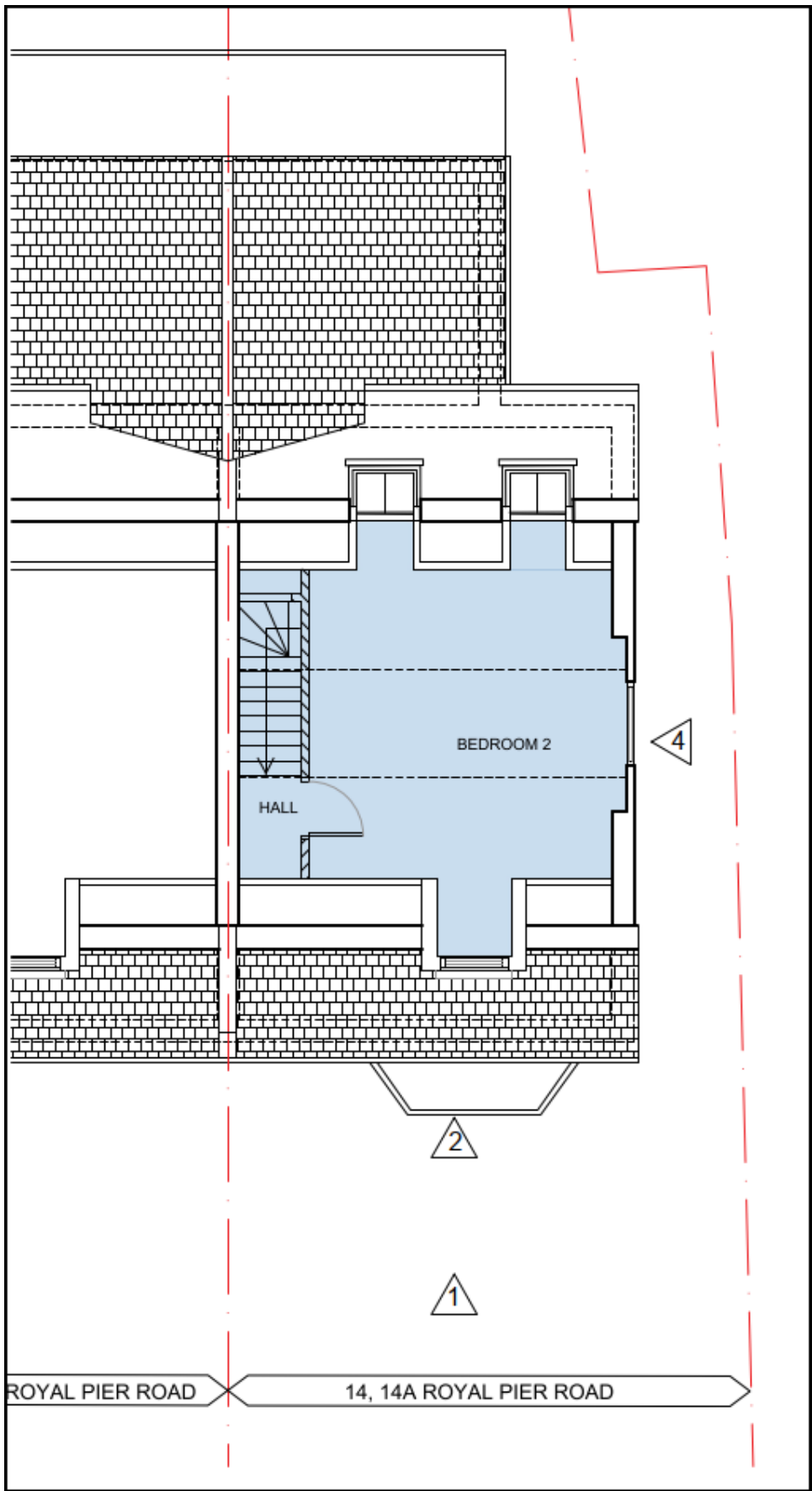
This application follows planning approval reference 20221075 for *'Internal alterations & external including a front roof dormer access alterations all to convert existing lower ground floor flat and house above into three flats including 2 x 1 bed flats and 1 x 2 bed flat.'*

This application seeks to amend the approved scheme. Based on the plans provided, the changes would include:

- Omission of the approved dormer window on the rear roof slope and replacement with (total 2no.) velux conservation windows.
- Removal of second floor bathroom, to enlarge bedroom 2.



Approved second floor Plan



Proposed Second Floor Plan

Approved front and rear elevations





Proposed front and rear elevations





Proposed front and rear elevations

Principle of Development

This dwellinghouse is located in an urban area, near Gravesend Town Centre, in the Riverside Conservation Area, in the Gravesend Town Centre Opportunity area (3.4 East of Town Centre & Riverside).

Previously, the scheme was considered acceptable in principle, the assessment noted that the scheme provided a minimal contribution to housing need and that it would be in a sustainable location. There is not change in this assessment as a result of the changes proposed. Parking requirement would also not be impacted by the internal change and proposed roof alterations. To avoid repetition, these matters will not be assessed again by this application. However, their acceptability, shall be afforded the necessary weight in the planning balance at the conclusion of the assessment.

The remaining matters for assessment of this application are:

- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity

Design, Character and Appearance (including Heritage)

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area. Section 12 (Achieving well-designed places) of the NPPF sets out that developments should function well and add to the overall quality of the area, be visually attractive and sympathetic to local character.

Policy CS20 (LPCS) sets out 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. Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. Saved Policy TC3 (LPFR) expects development to make a positive contribution to Conservation Areas.

Section 16 of the NPPF (2024) sets out national policy on heritage matters and it states that great weight should be given to a heritage asset's conservation. Account should be taken of the desirability of sustaining and enhancing the significance of heritage assets (paragraph 203(d)).

The dwellinghouse forms part of the Riverside Conservation Area and so greater weight is placed on preserving the character and setting of the area.

Although not positionally prominent to the river, this dwellinghouse is located in the Conservation Area and contributes to it. As can be seen in the below map taken from the Conservation Area appraisal, this row of three terraced buildings are considered to be positive to the Conservation Area.



These dwellinghouses are of heritage value and contribute to the Conservation Area and so those features which provide a positive contribution to the special character of the area should be preserved.

In this case in particular, the roof dormers as approved, were considered appropriate only due to the reflectiveness of the neighbouring properties, and the symmetrical appearance it would give. Elsewhere in Pier Road, dormers have been resisted and considered harmful to the character of the Conservation Area. One particular instance is refused planning application 20181052, for 12 Pier Road, which proposed

'Construction of a dormer extension in the rear roof slope and velux window in the front roof slope and conversion of the roof space into habitable rooms.'

In that case, the Conservation Officer made the following comments

'The proposal is for a large rear dormer window and a single pane roof light to the front roof slope. The roof of the proposal is visible from Royal Pier Road and both front and rear roof slopes are visible as the road turns north through 90 degrees after passing the end of the terrace (number 13).

Of the 13 two storey buildings in Royal Pier Road that are of the same late nineteenth century style, 3 have windows on the front roof slope; two with non-matching late addition dormers and the adjacent building with a later addition two pane roof light. These later additional front roof windows detract from the appearance of the group of roofs that contribute to the appearance of this part of the conservation area. Such cumulative alterations detract from the special character and appearance of the conservation area and should be avoided.

The adjacent building has a front roof light (two pane) and a pair of dormer windows on the rear roof slope. This is the only visible pair of rear roof dormer windows in Royal Pier Road, including those visible roofs of buildings in Clarendon Road.

The proposed alterations to the front and rear roof slopes will be visible from the public highway and will appear out of character with the predominant appearance of the two storey terrace houses in this part of the conservation area, which is roof slopes with no windows.

It is not possible to support the proposed roof alterations due to the harm cause to the appearance of the conservation area as a result of the cumulative loss of plain roofs that positively contribute to the conservation areas appearance.'

Whilst these comments are from a different application, given the close proximity, in the same Conservation Area, similarity between the buildings, and similar nature of the proposals, it is clear that these comments can be applied to the situation at hand. It is noted that in the examples given above, the location and visibility of the roof alterations plays a key role in its impact.

Whilst it is noted again that the neighbouring properties forming part of this row of terraces have dormers, neither have velux windows. The dormers were acceptable as an exception to other properties in the area, as they would reflect the neighbouring properties in the row. Roof windows to the rear roof slope as this application proposes, would create would have lesser impact given its reduced visibility. The proposed replacement of the approved rear dormer would therefore not result in harm to the high quality appearance of Conservation Area.

On balance, the proposed development would comply with the requirements of Saved Policy TC3 of the Gravesham Local Plan: First Review (1994). Policy CS19 and CS20 of the Core Strategy 2014 and Sections 12, 15 and 16, of the NPPF (2024) and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in terms of design, character and appearance and impact on the Conservation Area

Amenity of Future Occupiers

The only internal changes from the approved scheme, is the removal of the second floor bathroom and enlargement of bedroom 2 as a result.

Previously, the proposed rooms were considered to comply with the residential internal space guidelines within the Residential Layout Guidelines SPD with exception the existing of the lower ground bathrooms and wc which fall below the limit. However, this is not changed from the existing wc and bathroom facilities currently serving the house which extends over 2 floors, as such it was considered to be unreasonable to refuse the application based on this alone. The proposed application does not change the layout of these

floors and so this is still considered to be acceptable. The removal of the bathroom is not considered unacceptable as there would be a bathroom retained in the lower floors and the larger bedroom, would not raise concerns regarding inadequate space standards.

The altered rooms meet the required minimum space standards and would not result in inadequate rear garden depth and area as per SPG2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020.

Neighbouring Amenity

The subject property adjoins 8-13 Royal Pier Road, located to the north. Their rear gardens face the rear garden and side elevation of the subject building. To the south, attached is 15 Royal Pier Road. The use of rooflights in place of the approved dormers would result in a reduced impact. The rooflights would also be obliquely angled so as not to result in overlooking.

The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014.

Conclusion

Given the limited visibility of the proposed rooflights at the rear, this change would be considered acceptable in design terms. No other matters would be impacted by the change. The proposed development as altered would therefore comply with all relevant national and local planning policies.

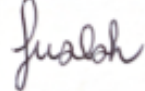
Recommendation

The recommendation is to approve this application.

Conditions

The following conditions should be amended. Condition 1 (Standard Time Limit) relates to the time limit applied for works to begin. This should be updated to clarify the date by which works shall begin. Condition 2 (approved plans, should be amended to refer to the new and updated drawings. Condition 3 (approved materials), should not be altered.

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	13th January 2025	Dated:	13 January 2025