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Dear Sirs

Planning, Design and Access Statement

Description of Development: Change of Use of dwelling to a self-contained one bedroomed flat at basement level, with new bin and bike store in back garden and a seven bed, seven person HMO above and ongoing management plan for those areas.

Location: 49 Pier Road, Northfleet, Gravesend DA11 9NB

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H. Photosheet: Recently completed project examples from Mr. G. Daramola

* Acknowledgements —Dan Butler (ArchiTechnology.Design) technical text adapted in this Statement.

1.0 Introduction

This Planning, Design & Access Statement accompanies the planning application, existing and proposed drawings and Heritage Statement for the Change of Use of No. 49 Pier Road from a single family dwelling (Use Class C3) to a self-contained ground floor flat and a 7 bed / 7 person HMO above. The application is supported by a Household Management Plan and a Rubbish / Recycling / Bin Management Plan which set out the practical arrangements to ensure the property is managed in a quiet, neighbourly and effective manner. A Flood Risk Statement and surface water, Noise & Fire Safety Statement and an Energy & Sustainability Statement are also included.

2.0 Site context and existing situation

No. 49 Pier Road comprises an existing residential property within the established urban area of Northfleet and Gravesend and is located in a sustainable location with good access to local services and public transport. No.49 is within Flood Zone 1, as is the rest of Northfleet and Gravesend and comprises an area with low probability of flooding.

A Certificate of Lawfulness of Proposed Use application for a C3 to a C4 small HMO use is currently under consideration, Ref: 20251258. This proposal would add an additional bedroom and person and provide better internal arrangements as well as bin and cycle store for all 7 tenants.

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.

The property has, for a long period, been in one family use with an informal separation of the basement section as a ground floor flat, having both internal and external access. However, this arrangement has not benefitted from formal planning permission and this application seeks to regularise the current pattern of use in a managed and policy-compliant way.

3.0 Heritage & Article 4

The site sits within the Lansdowne Square Conservation Area and within an Article 4 Direction area. See separate Heritage Statement.

Gravesham's Article 4 guidance explains that Directions remove certain householder permitted development rights from C3 dwellings and from C4 and other HMOs to prevent incremental erosion of a Conservation Area's character and lists examples of external works commonly controlled (e.g. replacement windows/doors, roof works/rooflights, painting/rendering, boundary works, hard surfacing and outbuildings).

This proposal is conservation-led: it requires no substantial external alteration to the Pier Road principal elevation; the building's external form and principal features will be retained. Any necessary external repairs or limited replacements will be undertaken as like-for-like conservation repairs or will be the subject of express planning submissions where Article 4 controls take force. The Household Management Plan and a Rubbish, Recycling and Bin Management Plan have been created specifically to prevent the issues identified in the Appraisal, thereby protecting the streetscape.

4.0 Key planning policies

This application has been prepared with regard to the Development Plan and other material considerations, including:

Gravesham Local Plan Core Strategy and Policies Map, September 2014 — in particular:

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS14 – Housing Types and Size
- 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 — notably:

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- 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.

The above policy list is drawn together with the Council's local guidance on conservation and Article 4 Directions as described in the Lansdowne Appraisal and the Article 4 guidance (Gravesham Borough Council) and which guide management of change within the Conservation Area.

These documents and policies provide the framework for assessing the acceptability of this proposal, having regard to the need to conserve heritage assets whilst making efficient use of existing housing stock.

5.0 Principle of development

The proposal regularises an established pattern of occupation by creating a self-contained ground floor flat and a modest 7-person HMO above. The site is within the urban area and the principle of residential conversion is supported by CS14 and saved Policy H5, subject to detailed considerations relating to residential amenity, highways and conservation. The site is well served by a range of public transport and nearby amenities for employment, leisure and everyday requirements.

6.0 Design, layout and residential amenity

The proposed change of use requires no substantial external extension or remodelling of the Pier Road principal elevation, roof form, or external fabric. The subdivision is entirely internal and the property will retain its existing external appearance. Any necessary repairs or limited replacements will be carried out in appropriate materials and traditional detailing. The Household Management Plan will ensure communal areas are maintained and that residential amenity for occupants and neighbours is preserved.

6.1 Internal subdivision

- **Ground floor self-contained flat (basement/ground):**
  - One bedroom, living/kitchen, bathroom;
  - Independent access from the ground floor level via its own original external steps;
  - Dedicated refuse and cycle access and storage at rear ground level.
- **Upper 7-bed, 7-person HMO (first floor and above):**
  - Seven bedrooms with appropriately located communal kitchen / living facilities;
  - Bathrooms and kitchens stacked where possible to make best use of existing services;

- Internal circulation via the existing staircore (removal of internal stair access to the ground floor flat);
- shared communal areas designed to modern amenity standards for HMOs.

These internal changes avoid structural alteration to principal elevations or roof forms and preserve the external character of the building. All room sizes and layouts meet the Council's HMO amenity guidance.

6.2 Internal amenity & servicing

- All habitable rooms will receive adequate daylight and ventilation.
- Communal spaces and kitchens are sized and located to provide good levels of amenity.
- Internal storage for refuse, recycling and tenant storage is provided, together with cycle parking at the rear.
- The Household Management Plan sets out cleaning, servicing and bin presentation arrangements to avoid street clutter and nuisance.

6.3 Access

- **Primary access** from the public pavement to the main entrance is retained.
- **Separate access arrangements** are provided for the flat and the HMO to ensure clear functional separation between units.
- **Inclusive access:** there is no material change to existing inclusive access arrangements across the public frontage. Any minor alterations to thresholds, internal ramps or handrails will be designed to meet Building Regulations where feasible without harming the external appearance.

6.4 Conservation sensitivity

All internal works and any minimal external repairs will be carried out in a conservation-sensitive manner (like-for-like repairs or by express application where Article 4 applies). The design therefore secures high quality internal accommodation while preserving the Pier Road façade and streetscape.

7.0 Highways, accessibility and sustainable travel

The site occupies a sustainable, town-fringe location with good pedestrian and public transport links to Gravesend town centre and its railway station. access to local shops, bus services and Gravesend mainline station. The immediate area is characterised by a historic pattern of terraced houses, conversions and small HMOs, and has limited on-street parking provision. However conversely this also makes for an efficient and regular public transport system as well as a walkable neighbourhood. Burch Road bus stop on London Road is a 5 minute walk away and there are local shops nearby. Gravesend Railway station is a 16 minute walk away or a 6 minute cycle ride, with regular rail services to all stations between the town and London as well as the Kent coast. Northfleet station has a less regular rail service and is a 9 minute cycle ride or a 36 minute walk. There are many vehicle hire companies nearby. The Imperial Retail Park backs onto No.49 with a range of employment opportunities, further reducing the need to travel.

7.1 Local context and accessibility

- Strong public transport accessibility and walking distance to shops and services reduce the need for private car use.

7.2 Highway impact

The proposal creates **one additional household unit** (the formalisation of the flat + HMO) and will therefore generate only a negligible increase in vehicular trips. HMO tenancy

typically generates lower car ownership; the scheme is therefore not anticipated to cause severe highway impact and accords with CS11 and saved policies T1 and P3.

7.3 Parking & cycle provision

No on-site car parking is proposed, consistent with local practice for small conversions in sustainable locations. Secure, ground-level cycle storage is provided at the rear for both the flat and the HMO; the Management Plan contains measures to ensure cycle facilities are maintained and used. Refuse and recycling arrangements are organised to avoid obstruction and street clutter.

7.4 Conclusion

Given the sustainable location, small scale of the subdivision and proposed cycle provision, the development is considered to raise no highway safety or severe traffic impact concerns.

8.0 Key legislation and overlapping regimes

It is a matter of good planning practice to not overlap the regimes of other legislation[i].

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.

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'.

HMO accommodation is regulated by housing legislation (including management regulations) and building regulations. The Management Plan and HMO operation will ensure compliance with those regimes. Where external works fall within the scope of the Article 4 Direction the applicant will either carry out like-for-like repairs (where acceptable) or submit express planning applications for approval.

9.0 Energy Efficiency of No 49 Pier Road

The current energy rating of this solid wall building is EPC 'F'. This will be significantly upgraded to an EPC rating of above 'C' (or demonstrably equivalent carbon reductions). See Separate Energy & Sustainability Statement.

Proposed measures include internal solid-wall insulation where appropriate, loft insulation, repair-led window works with discreet secondary glazing where necessary, efficient heating and controls, LED lighting, and tenant energy-management guidance to reduce operational consumption. Final uplift will be confirmed by SAP modelling and the post-completion EPC.

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 2035ii.

10.0 Compliance with Validation Requirements

The application bundle submitted meets the Gravesham validation checklist for this type of proposed development and Conservation Area proposal. The submission includes:

- Completed application form and fee
- Location plan and block/site plan

- Existing and proposed floor plans, sections and elevations (showing neighbouring context)
- Heritage Statement (conservation area appraisal response)
- Design & Access content (included, proportionate to the proposal)
- Fire Safety Statement (see separate combined statement)
- Noise / Acoustic separation note (see separate combined statement)
- Parking & Transport Statement and cycle provision details (included)
- Bin & Cycle Storage Strategy and Household Management Plan (HMO see separate statements)
- Flood Risk Assessment and Surface Water / Drainage strategy (see separate statement)
- Energy & Sustainability Statement and EPC (baseline) (see separate statement)

11. Summary

The proposal will regularise an established internal arrangement and make efficient use of an existing building within a sustainable urban location.

It is conservation-led: the Pier Road elevation, roof form and principal features will be retained; any external repair or replacement will be sympathetic to the Conservation Area or the subject of express applications where Article 4 controls apply.

Operational safeguarding: The Household Management Plan and the Bin Management Plan are designed to avoid the adverse operational impacts identified in the Lansdowne Appraisal. For these reasons the proposal is considered to preserve the character and appearance of the Conservation Area and is acceptable in heritage and planning terms.

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 Policies CS14: Housing Type and Size and CS20: Heritage of the Local Plan Core Strategy (2014) and saved Policies H5: Increasing the Housing Stock by the Conversion of Existing Buildings and TC3 Conservation Areas of the Local Plan First Review (1994) making efficient, sustainable use of an existing building whilst preserving the character and appearance of the Lansdowne Square Conservation Area.

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

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[i] NPPF 2025, 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."
[ii] https://www.thisismoney.co.uk/money/mortgageshome/article-10191013/Britains-Victorian-housing-stock-values-plummet-government-introduces-EPC-regulation.html