

Planning and Design Statement

For
Best Western Manor Hotel



In Support of Planning Application
at Manor Hotel, Hever Court Road,
Gravesend DA12 5UQ

July 2023



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1. Delegated Report for application Ref 20200104

1 INTRODUCTION

- 1.1 This Planning and Design Statement has been prepared on behalf of Best Western Manor Hotel in support of a planning application for minor external alterations and a reduction in car parking associated with the proposed enhancement of the Manor Hotel, Hever Court Road, Gravesend DA12 5UQ.
- 1.2 The development proposal represents a revised version of the scheme (Ref 20200104) which was approved by the Council in June 2020 and proposed minor external alterations and a reduction in car parking associated with the general enhancement of the Manor Hotel (as examined in further detail at Section 3).
- 1.3 The Statement addresses the following matters:
- A description of the site and surroundings;
 - A review of the background and history of the site;
 - An explanation of the development proposal;
 - A review of relevant planning policy;
 - An appraisal of the relevant planning issues, and
 - Conclusions.
- 1.4 Accordingly, this Statement addresses the design principles and concepts that have been applied to the development in respect of the location, use, layout, scale, appearance and landscaping – in relation to the site's context. As such, the Statement meets the requirement to formally state how design and access issues have been considered.
- 1.5 The Statement should be read in conjunction with the other documents submitted in support of the application, namely:
- Drawings package (prepared by Sub Rosa Architecture), and
 - Transport Statement (prepared by Vectos).
- 1.6 The submissions conclude that the development proposal is acceptable, and supportable, in planning terms and that planning permission should be granted.

2 SITE AND SURROUNDINGS

- 2.1 The site comprises the two storey Best Western Manor Hotel and associated car park. The hotel itself is a private, family run facility which originally opened in 1991. It provides a total of 64 bedrooms together with associated business/function accommodation and ancillary uses including a restaurant.
- 2.2 The site is rectangular in shape and extends to 0.5 ha. It falls within the urban area of Gravesend, forming part of its south eastern fringes approximately 2.5 km to the south of the town centre.
- 2.3 The hotel building is positioned within the western part of the site, with the main car parking area (extending to 78 spaces) encompassing the central element (as shown on the 3D overhead image overleaf). The eastern part of the site comprises an overspill gravel parking area.
- 2.4 There is a single central vehicular access point into the central part of the site from Hever Court Road.
- 2.5 To the south of the site lies a footpath and landscaped green buffer extending to approximately 60 meters width, which separates the site from the A2 dual carriageway. To the west is a Premier Inn and The George public house/restaurant.
- 2.6 The north of the site abuts Hever Court Road, beyond which lies a large established residential area and park (known locally as Mackenzie Way open space). The visual character of the urban area predominantly comprises two storey semi detached and terraced residential properties.
- 2.7 In summary, the site comprises a hotel within the urban area that incorporates a large underutilised, overspill car parking area. Accordingly, the wider site is considered to represent an acceptable location (in principle) for new development subject to adhering to standard planning/design considerations and ensuring that there will be no adverse impact upon the operational requirements of the hotel.
- 2.8 A selection of site images/photographs is provided below.



Image 1 - Overhead view of site showing hotel building, main car park and overspill gravel area



Image 2 - Photograph of hotel and existing site entrance from Hever Court Road to north



Image 3 – View of main car park facing west towards hotel



Image 4 – View of overspill car park facing east



Image 5 - View of overspill car park facing east

Background to Manor Hotel and the application proposal

- 2.9 The hotel is a private, family run facility which has been operational since 1991 and provided a range of employment opportunities for the local community throughout this period.
- 2.10 During recent years, occupancy levels and average daily room rates have both fallen resulting in reduced viability. This trend can be attributed, in part, to the introduction of 180 new budget hotel rooms within a 3 miles radius of the Manor Hotel. Furthermore, operating costs have risen in recent years and there has been a significant social change to both the needs of the overnight traveller and the event and function market sector.
- 2.11 The latter has resulted in less weddings and considerably fewer corporate meetings and events. By way of demonstration, in 2013 the Manor Hotel was host to over 25 weddings year in addition to numerous conferences and business meetings. In 2019, the number of weddings had reduced to 3. This means that the hotel's function suites are now significantly underutilised, with the hotel now operating as a resident only business (ie with no external weddings or functions).
- 2.12 Against this background, the owners of the hotel are seeking to undertake a series of internal reconfigurations which will result in the improvement of the hotel's offer by offering a mix of different room types that will help differentiate the hotel from the saturated local budget and limited service market.
- 2.13 It is proposed to introduce a selection of upgraded 4 star rooms and suites based on the fastest growing hotel sector in major UK cities and across the USA in conjunction with Best Western. The rooms will provide greater space and quality of service that is not currently available within the local area, enabling the continued operation of the hotel and preservation of existing jobs. The reconfigurations to existing rooms (as shown on the submitted floorplans) will result in the overall reduction on the number of rooms from 64 to 25.
- 2.14 To help fund this significant programme of works, the owners of the hotel are seeking to develop the existing underutilised overspill car parking area (and part of the existing hotel car park) for a new residential scheme with associated parking.
- 2.15 Without the potential financial uplift that could be generated from this development, it is highly unlikely that the programme of modifications/improvements to the hotel would be viable.

3 PLANNING HISTORY

3.1 A review of the Council's records indicates that the site has been subject to several previous applications, all associated with the use of the site as a hotel, as summarised below:

- **Ref 20200104** - Minor external alterations and reduction in car parking associated with the general enhancement of the Manor Hotel – Approved 11th June 2020;
- **Ref 20100882** - Display of internally illuminated free standing pole sign to replace existing – Approved 14th December 2010;
- **Ref 20100854** - Erection of part single storey, part 2/3/4 storey extension on eastern elevation to provide additional guest accommodation on first, second and third floors with coffee/games room, dining room, tv room, kitchen, lobby, wc accommodation and reception on ground floor with a link above functions room to additional rooms – Approved 10th December 2010;
- **Ref 20090027** - Partial demolition and erection of part four, part three, part two and single storey extensions to provide additional guest rooms (to make a total of 89 rooms), kitchen, brasserie, cafe/bar and offices with associated alterations – Approved 26th February 2009;
- **Ref 20080423** - Partial demolition and erection of part two store, part three storey extension to form 22 guest rooms, kitchen, cellar, bar, function room entrance hall, maintenance room, staff car parking and canvas entrance canopy with associated alterations – Approved 1st July 2008;
- **Ref 20000809** - Erection of two storey extension on the north elevation facing Hever Court Road to form eight additional guest rooms, demolition of the existing single storey buildings and erection of a single storey extension to form six additional guest rooms, enlarged restaurant and linen/garden stores incorporating the provision of new garden/courtyard on the south elevation facing A2; and alterations to the east elevation – Approved 11th January 2001;
- **Ref 19950440** - Erection of two storey extension on the north-west corner and conversion of the Manager's dwelling to provide 16 no. additional guest rooms; variation of conditions (vii) and (ii) of planning permission reference no. GR/90/815 and GR/92/336 to allow use of the pool and leisure facility for non-residents and revised landscaping scheme in pursuance of outline planning permission reference no. GR/86/158 – Approved 22nd August 1995;
- **Ref 19930039** - Construction of a roof over enclosed courtyard area – Approved 11th March 1993;
- **Ref 19920358** - Display of non-illuminated goal post sign facing west, 1 non-illuminated goal post sign at junction of A2 slip- road & Hever Court Rd, 1 non-illuminated panel set in- to the fence facing south, non-illuminated V shaped sign on south elev. at 1sr floor level, 1 three sided advert & 1 neon hotel signs on east gable – Approved 9th October 1992;

- **Ref 19920336** - Erection of single storey extension on south elevation to form exercise room – Approved 21st July 1992;
- **Ref 19910469** - Erection of single storey extension on the north elevation to form hotel breakfast room/coffee lounge and erection of a conservatory on the west elevation of the manager's house – Approved 3rd February 1992, and
- **Ref 19910374** - Display of 2 free-standing externally illuminated double-sided goal post signs; 3 no flag-poles; externally illuminated projecting hanging sign; illuminated and non-illuminated individual lettering; externally illuminated panels inset to both sides of entrance walls to Hever Court Road – Refused 11th July 1991.

4 THE PROPOSAL

- 4.1 The existing hotel building will be subject to a series of internal reconfigurations which will result in the improvement of its offer to visitors, enabling the site to evolve to meet modern requirements and helping to preserve the long term viability of a hotel use at this location (together with all existing jobs).
- 4.2 The principal change relates to the removal of the existing flat roof single storey laundry facility which currently occupies part of the central element of the hotel extending to its southern side elevation (the removal of this part of the existing building was approved in association with the previous application at the site Ref 20200104).
- 4.3 Minor external changes are also proposed to the front (eastern) elevation comprising the demolition of the ground floor bay serving the existing conference room, removal of the two gable roof features and replacement with three new dormers set within the eastern roofslope.
- 4.4 As demonstrated on the submitted layout plans, these external alterations form part of a wider programme of (largely internal) works to the existing hotel which will result in the improvement of the hotel's offer by offering a mix of different room types and enhanced facilities (including modern dining space, social hub, residents garden and external terraces at first floor) that will help differentiate the hotel from the saturated local budget and limited service market.
- 4.5 As outlined in Section 2, it is proposed to introduce a selection of upgraded 4 star rooms and suites based on the fastest growing hotel sector in major UK cities and across the USA in conjunction with Best Western. The rooms will provide greater space and quality of service that is not currently available within the local area, enabling the continued operation of the hotel and preservation of existing jobs.
- 4.6 The reconfigurations to existing rooms (as shown on the submitted floorplans) will result in the overall reduction on the number of rooms from 64 to 25 within the following mix:
- 5 standard rooms;
 - 5 larger suites;
 - 15 executive apartments for longer stay visitor accommodation.
- 4.7 These alterations will not result in a material change to the use of the existing hotel (Class C1) or to the visual character or appearance of the hotel building given that the vast majority of works will take place internally. The flat roof structure to be removed is essentially screened from view given its position relative to the southern side elevation of the building. It does not make a positive contribution to the visual appearance of the existing hotel building (please refer to Figure 2 below).



Figure 1 – 3D model of southern elevation of existing hotel identifying flat roof structure to be removed as part of proposed works

- 4.8 To help fund the above programme of works, the owners of the hotel are seeking to develop the existing underutilised overspill car parking area (and part of the existing hotel car park) for a new residential development (comprising 12 houses) with associated parking and amenity space.
- 4.9 The area of the wider site to which this proposal relates is highlighted in blue on the submitted site layout plan. As a result of this scheme, the total car parking spaces that currently serve the hotel will reduce from 100 to 20 (to reflect the oversupply in provision and the proposed reduction in the overall number of rooms).

5 PLANNING POLICY

5.1 This section provides a review of relevant national and local planning policy and guidance.

NATIONAL POLICY

5.2 The National Planning Policy Framework (NPPF) was revised in July 2021 and sets out the Government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development.

5.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

5.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework.

5.6 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Building a Strong and Competitive Economy

5.7 Chapter 6 of the NPPF emphasises that the government is committed to ensuring that the planning system should help create conditions in which businesses can invest, expand and adapt. Significant weight is afforded to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This section also recognises that a poor environment and lack of housing can act as a potential barrier to investment.

Promoting Sustainable Transport

5.8 To protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities; address the needs of people with disabilities by all modes of transport; create safe and secure places minimising conflicts between traffic and pedestrians; allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Making Effective Use of Land

- 5.9 The NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 5.10 Paragraph 120 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs. Furthermore, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.11 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 124 sets out that the planning system should support development that makes efficient use of land, taking into account the following:
- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) Local market conditions and viability;
 - c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) The desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change; and
 - e) The importance of securing well-designed, attractive and healthy places

Achieving Well Designed Places

- 5.12 This chapter sets out at paragraph 130 that planning policies and decisions should aim to ensure that developments:
- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Are visually attractive as a result of good architecture and appropriate landscaping;
 - Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks, and
 - Create places that are safe, inclusive and accessible and which promote health and well-being.

Decision Taking

- 5.13 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

DEVELOPMENT PLAN

- 5.14 The Development Plan comprises the Core Strategy (adopted in 2014). The Council is in the early stages of preparing its Site Allocations/Development Management Policies Documents, which will ultimately replace the Core Strategy. However, it does not represent a material consideration at this stage.
- 5.15 Accordingly, the Core Strategy sets out the detailed policies for consideration of planning applications within the borough. The policies relevant to the assessment of the development proposal are summarised below.
- 5.16 **Policy CS01 (Sustainable Development)** states that planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.
- 5.17 When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 5.18 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - Specific policies in that Framework indicate that development should be restricted.
- 5.19 **Policy CS07 (Economy, Employment and Skills)** – As part of the Council’s strategy to encourage the delivery of new employment floorspace and opportunities within the borough, the Council will support the refurbishment and upgrading of existing commercial premises to facilitate more flexible working practices and the changing economic needs of the Borough.
- 5.20 **Policy CS11 (Transport)** advises that new developments should mitigate their impact upon the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.
- 5.21 Sufficient parking should be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 5.22 **Policy CS19 (Development and Design Principles)** advises that new development should be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti- crime standards. The design and construction of new development will incorporate sustainable

construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

- The design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;
- New development will be located, designed and constructed to:
 - safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
 - avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
 - not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
- The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
- New development will be designed in an inclusive way to be accessible to all members of the community;
- New development will provide appropriate levels of private and public amenity space;
- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- Car parking will be well related to the development it serves;
- New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste; and
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

6 PLANNING CONSIDERATIONS

- 6.1 The planning issues relevant to the determination of the development proposal are assessed in detail below.

Principle of Development

- 6.2 As explained within Section 5, the hotel building will be subject to a series of internal reconfigurations which will result in the improvement of its offer to visitors, enabling the site to evolve to meet modern requirements and helping to preserve the long term viability of a hotel use at this location (together with all existing jobs) in accordance with guidance set out within the NPPF and Policy CS07 of the Core Strategy.
- 6.3 The principal change relates to the removal of the existing flat roof single storey laundry facility which currently occupies part of the central element of the hotel extending to its southern side elevation (the removal of this part of the existing building was approved in association with the previous application at the site).
- 6.4 As demonstrated on the submitted layout plans, the external alterations form part of a wider programme of (largely internal) works to the existing hotel which will result in the improvement of the hotel's offer by offering a mix of different room types and enhanced facilities (including modern dining space, social hub, residents garden and external terraces at first floor) that will help differentiate the hotel from the saturated local budget and limited service market.
- 6.5 The reconfigurations to existing rooms (as shown on the submitted floorplans) will provide greater space and facilitate an enhanced quality of service that is not currently available within the local area, enabling the continued operation of the hotel and preservation of existing jobs.
- 6.6 This will result in the overall reduction on the number of rooms from 64 to 25 within the following mix:
- 5 standard rooms;
 - 5 larger suites;
 - 15 executive apartments for longer stay visitor accommodation.
- 6.7 Given that the existing use of the building as a hotel (Use Class C1) will be preserved, the key matter for consideration relates to the minor external alterations to the existing building, as discussed in further detail below.
- 6.8 The proposed alterations should be considered acceptable in principle, on the basis that these will enable the hotel to evolve to meet modern requirements and help preserve its long term viability (as explained within Section 2) together with all existing employment roles for the benefit of the local community in accordance with Policy CS07 of the Core Strategy.
- 6.9 This position was confirmed by the Council in approving the similar application at the site (Ref 20200104). Please refer to the delegated report attached at **Appendix 1**.

Design

- 6.10 The considered approach to scheme design is outlined in Section 5.
- 6.11 The proposed alterations will not result in a material change to the use of the existing hotel or to the visual character or appearance of the hotel building given that the majority of works will take place internally.
- 6.12 The flat roof structure to be removed is essentially screened from public view given its position relative to the southern side elevation of the building. It does not make a positive contribution to the visual appearance of the existing hotel building and its removal will enable the creation of an outdoor garden area for the benefit of hotel guests.
- 6.13 Minor external changes are also proposed to the front (eastern) elevation comprising the demolition of the ground floor bay serving the existing conference room, removal of the two gable roof features and replacement with three new dormers set within the eastern roofslope.
- 6.14 The scope of external alterations to the existing hotel building is similar to what was assessed as acceptable in association with the previous application at the site.
- 6.15 Accordingly, the scheme complies with all relevant design related criteria (as outlined within Policy CS19).

Highways

- 6.16 As explained in Section 4, the owners of the hotel are seeking to develop the underutilised overspill car parking area within the eastern element of the wider site (as well as part of the existing hotel car park) for a new residential development (comprising 12 houses) with associated parking and amenity space.
- 6.17 As a result of this scheme, the total car parking spaces that currently serve the hotel will reduce from 100 to 20 which reflects the current oversupply in provision and the proposed reduction in the number of hotel rooms.
- 6.18 The application is supported by a Transport Statement which demonstrates that the amount of car parking provision retained for the reconfigured hotel is acceptable and will ensure no adverse impacts upon highways safety.
- 6.19 Accordingly, the scheme will comply with Policies CS11 and CS19 in ensuring that an acceptable amount of car parking will be retained for the hotel. There will be no adverse impact upon its operational requirements.
- 6.20 Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Against this background, we do not consider that there is any reason to refuse the scheme on highways grounds.

7 CONCLUSIONS

7.1 It is concluded that the scheme is in accordance with the NPPF as well as the Council's Core Strategy. It constitutes appropriate development and should be supported for the following reasons:

- The application represents a revised version of the scheme (Ref 20200104) which was previously considered acceptable by the Council in June 2020;
- The hotel building will be subject to a series of internal reconfigurations (with associated minor external works) which will result in the improvement of its offer to visitors, enabling the site to evolve to meet modern requirements and helping to preserve the long term viability of a hotel use at this location (together with all existing jobs) in accordance with guidance set out within the NPPF and Policy CS07 of the Core Strategy;
- The extent of external alterations are minor in nature and will have no discernible impact upon the visual appearance of the existing hotel building. Accordingly, the scheme complies with all relevant design related criteria (as outlined in Policy CS19 of the Core Strategy), and
- The total car parking spaces that currently serve the hotel will reduce from 100 to 20, which reflects the current oversupply in provision and the proposed reduction in the number of hotel rooms. The Transport Statement submitted as part of this application demonstrates that the reduced amount of car parking retained for the reconfigured hotel is acceptable and will ensure no adverse impacts upon highways safety in compliance with Policies CS11 and CS19 of the Core Strategy.

7.2 In light of the above, the revised scheme has been demonstrated to comply with all relevant planning policies (most notably the NPPF and Policies CS07, CS11, CS19) and should be considered acceptable.

Appendix 1

Delegated Report

Application No: 20200104

Location: Manor Hotel Hever Court Road Gravesend Kent

Description: **RECONSULTATION** Minor external alterations to existing hotel including reduction in car parking area.

Applicant: Mr Mike Rossi

Site Visit Date: 10 March 2020

Submitted Documents/Plans

The application comprises the following documents and plans:

Application for planning permission form;
 Red/blue line site boundary plan;
 Drawing no. 19-1354-20B Existing block plan;
 Drawing no. 19-1359-01 Existing block plan;
 Drawing no. 19A-1359-02B Proposed block plan;
 Drawing no. 19-1359-03 Existing ground floor layout;
 Drawing no. 19-1359-04D Existing first floor layout;
 Drawing no. 19-1359-05C Proposed ground floor layout;
 Drawing no. 19-1359-06C Proposed first floor layout;
 Drawing no. 19-1359-07B Proposed elevations 1 of 3;
 Drawing no. 19-1359-08C Proposed elevations 2 of 3;
 Drawing no. 19-1359-09 Proposed elevations 3 of 3;
 Drawing no. DAT/9.1 Existing elevations 1 of 2;
 Drawing no. DAT/9.2 Existing elevations 2 of 2;
 Planning and Design Statement January 2020;
 Transport Statement January 2020;
 Transport Addendum Note March 2020;
 Drawing no. VN201615-D100 Rev. A Proposed alternative pedestrian access;
 Email from agent dated 09 April 2020 responding to GBC Highway Development Management Officer comments; and
 Email from the agent dated 04 May 2020 regarding pedestrian access.

Relevant Planning History

<u>Application No.</u>	<u>Description</u>	<u>Status</u>	<u>Decision</u>
20200105	**RECONSULTATION** Redevelopment of existing overspill car parking area situated to the east of existing hotel to provide a	PCO	

B8 storage facility

20100854	Erection of part single storey, part 2/3/4 storey extension on eastern elevation to provide additional guest accommodation on first, second and third floors with coffee/games room, dining room, tv room, kitchen, lobby, wc accommodation and reception on ground floor with a link above functions room to additional rooms.	PER	10.12.2010
20090027	Partial demolition and erection of part four, part three, part two and single storey extensions to provide additional guest rooms (to make a total of 89 rooms), kitchen, brasserie, cafe/bar and offices with associated alterations.	PER	26.02.2009
20080423	Partial demolition and erection of part two store, part three storey extension to form 22 guest rooms, kitchen, cellar, bar, function room entrance hall, maintenance room, staff car parking and canvas entrance canopy with associated alterations.	PER	01.07.2008
20000809	Erection of two storey extension on the north elevation facing Hever Court Road to form eight additional guest rooms, demolition of the existing single storey buildings and erection of a single storey extension to form six additional guest rooms, enlarged restaurant and linen/garden stores incorporating the provision of new garden/courtyard on the south elevation facing A2; and alterations to the east elevation.	PER	11.01.2001

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS09 – Culture and Tourism
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles

- CS20 - Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network

Other material considerations

National Planning Policy Framework (February 2019)

- Section 2 – Achieving sustainable development
- Section 6 – Building a strong, competitive economy
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG2 - Residential Layout Guidelines (1996)
- SPG 4 - KCC Parking Standards (2006)

Other documents

- Gravesham Landscape Character Assessment (2009)
- PGN 6 – Planning Guidance Note 6 Vehicle accesses on Classified Highways

Consultations, Publicity and Representations

GBC Highway Development Management Officer

Initial response:

This application is complex and whilst some pre-application advice has been sought, it does not relate to the current proposal.

The traffic generation and parking figures supplied are inadequate as it only refers to a single Friday, when demand may be at its lowest as there is liable to be little business traffic and the hotel is not well located for tourists. Nor does it allow for major users of the function accommodation, which would potentially favour weekends. Kent Highways have identified they will accept a TRICS analysis which would seem appropriate.

In terms of the hotel alterations and associated car park reduction, these are acceptable and comply with guidance but would have to be completed prior to the commencement of any other development on site. All facilities would have to be restricted to the use of people staying at the hotel, so no additional parking demand is created.

It is noted that Kent Highways require provision for coach parking, which I agree with, but generally it should be possible to accommodate this with careful management of the car park to provide for a coach party staying at the hotel when car parking demand should be reduced. A suitable management plan should be in place prior to the alterations taking place. Currently the only option would be for the coach to use the overspill car park.

Given the future requirement for the country to be carbon neutral and all fossil fuelled cars ceasing to be sold from 2035 at the latest, all parking spaces within the hotel car park should be wired to accommodate a minimum continuous supply of 7kW per space. It is recommended that 20% of spaces should also have the infrastructure installed to permit on site charging now.

Kent Highways has correctly identified that the self-storage facility could generate vehicles with

trailers, but the proposal makes no provision to cater for these. As it is proposed they would have to occupy two spaces within the hotel car park.

It is noted that the pedestrian access to the hotel will remain, but this is not well suited to serve the self-storage unit, this would be better served by having its own direct access that does not take it through a car park and a shared pedestrian/vehicle gate. It is accepted that this would require alterations to the highway but should increase safety within the site. There appears to be sufficient verge width to provide a suitable adoptable highway footway on the south side of Hever Court Road.

As it currently stands the developer should review the information submitted to ensure it is robust and in particular consider vehicle with trailer parking for the self-storage unit.

Second response:

Considering this application in isolation of the adjacent B8 development which is a separate application. The size of the hotel is reduced and the conference facility is removed and the remaining car park complies with supplementary planning guidance. As such traffic flows associated with the hotel should reduce.

It is noted that the style hotel appears to be changing to accommodate the longer stay visitor, possibly removing the likelihood of coach parties using the hotel. However, if possible, it is suggested that there should be a condition that either prohibits coach parties using the hotel or a Parking Management Plan is submitted demonstrating how coaches can be accommodated.

Third response:

Looking at the drawing it would be better for a direct link to Hever Court Road, with the footway extended along the verge if necessary rather than make people walk out into the edge of a large car park area just to gain access to a pedestrian gate. It's a simple modification on what they are proposing and so can easily be dealt with by condition.

Agree wholeheartedly with the imposition of conditions to control the timing of the works to protect highway safety interests.

Highways England

Initial response:

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the A2 (west) in the vicinity of Hever Court Road/ Watling Street.

We have assessed the applications and their supporting documents. While we acknowledge that the applications are separate and capable of being determined separately, they are also closely linked in transport terms. As a result, Highways England request the following information is provided:

1. An assessment of the number of trips for both existing and proposed hotel use using TRICS. The applicant provided information on trip generation based upon a one day survey, which Highways England does not consider to be a robust assessment upon which to compare the existing the proposed trip generation of this proposal.

2. An assessment of the number of trips for both existing and proposed B8 use using TRICS. Unless the applicant is seeking or wishes to accept a condition to restrict the use within B8, any assessment should be based on a “worst case scenario” ie parcel distribution style B8 use.

3. A likely trip distribution for all proposed uses. This is because the A2/Hever Court Road/Watling Street junction shows signs of operating over capacity with queuing existing on the mainline carriageway.

The applicant should formally set out the above information in a revised Transport Statement to fully address impacts to the SRN.

We look forward to receiving the required information in due course.

In the meantime we consider that the applications have yet to demonstrate that they will not materially affect the safety, reliability and/or operation of the strategic road network. They are therefore assumed not to accord with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Consequently, the local planning authority should not determine the applications, other than a refusal. If the authority wishes to permit the applications or they go to appeal, please contact us and we will provide our formal responses as they stand at that point in time.

Second response:

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the A2 (west) in the vicinity of Hever Court Road/Watling Street.

In our original response, dated 23 March, we raised concerns around

- trip generation,
- the extent and categorisation of the B8 usage and
- trip distribution.

The applicant's Transport Consultant, Vectos, has provided a Transport Assessment Addendum (VN201615, Dated March 2020) which addressed some concerns raised by Kent County Council that mirrored Highways England's own initial concerns.

Having reviewed the above addendum, Highways England has no further comments to make in regards to

- trip generation or
- the B8 usage, as the applicant is willing to agree to a condition confirming self-storage usage only.

Vectos has not fully addressed the issue of the trip distribution – preferring to indicate that the trip generation numbers associated with hotel are likely to be in the region of 8 AM peak hour two-way trips and 7 PM peak hour two-way trips. While the B8 usage is likely to generate 14 trips in the AM peak period and around 18 vehicles in the 12-13pm (interpeak period). The likely net trips onto the highway network is approximately 18 AM peak hour trips and 17 PM peak hour trips for both uses.

While the applicant has declined to provide further evidence as to trip distribution onto the network, even at a 50% split in East/West leaving the site – 9AM and 9PM (rounding up) trips would not cause a significant impact upon the SRN or at the A2/Hever Road/Watling St Junction. While the existing junction is operating at higher than normal levels due to existing traffic, Highway England would not consider the additional net trips onto the network at this particular junction to be more than could occur with natural daily fluctuations. Consequently, in this particular case, we are content to accept that the proposals would not be likely to have a detrimental effect upon the safety, reliability and/or operation of the strategic road network. They are therefore assumed to accord with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Please find attached Highways England HEPR Form recommendation and planning condition wording recommended to be attached to the above applications (we are content for the council to use alternative wording to the same effect if it so chooses). Should you have any queries regarding our response, please do not hesitate to contact us and please forward our comments to the applicant who can contact Highways England at PlanningSE@highwaysengland.co.uk.

Highways England recommends the following planning condition is included within any planning permission granted:

1) The B8 (Storage and Distribution) usage shall be specifically restricted to self-storage. Any alteration from the above land use category will require the submission of a new planning application and transport assessment to be agreed in writing by the Local Planning Authority and Highways England.

Reason: In order to ensure the safe and reliable operation of the Strategic Road Network in compliance with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Kent Highway Services

Initial response:

Thank you for your consultation in relation to the above planning applications. I have looked at both applications for the reconfiguration of the hotel and redevelopment of the adjacent land together.

The site is located approximately 2/5 miles from Gravesend town centre, and the A2 is accessed via a double roundabout layout approximately 400 metres east of the site. Hever Court Road is subject to a 40 mph speed limit and has double yellow lines parking controls in the vicinity of the site.

The proposal seeks to reconfigure the existing hotel which currently comprises 64 hotel rooms, business / function rooms, and an ancillary restaurant, to provide 34 hotel rooms, reduced conference facilities, and a guest gym and restaurant. The parking spaces are proposed to be reduced from 78 to 39, with a new B8 self storage 4,190 sqm unit on the overflow and eastern section of the site. Access is currently via a separate entry and exit barrier operated priority controlled junction.

An ATC was carried out on Thursday 20 June 2019, and identified that westbound traffic flows are higher. During the AM peak the highest volume of 455 for eastbound traffic is recorded at 0800-0900, and 529 for westbound traffic is recorded at 0700-0800. During the PM peak (1700-1800), vehicles peak at 341 for eastbound and 411 for westbound traffic.

PIC accident data has been interrogated, where there have been a number of accidents in the

vicinity of the site. However, it is considered that the records do not suggest that there are any prevailing road safety issues.

The site is accessible by walking and cycling and alternative modes of transport. However, given the location of the site in close proximity to the strategic road network, I would consider that the majority of customers will arrive by private car, or taxi hire from the station.

Development Proposals

The hotel currently provides 78 car parking spaces, with a gravel overspill parking area for approximately 20 parking spaces. The applicant has undertaken a parking survey on Friday 21 June 2019, to assess the car parking occupancy. The survey illustrates that the maximum capacity is 29 vehicles (including 7 staff) at 21:00. I consider that a more substantial survey period would make the data more robust.

Parking

The above mentioned parking survey has been utilised to establish a figure of 0.45 cars per bedroom. The survey provides a snapshot scenario, and is not considered robust enough. Supplementary Planning Guidance (SPG4) outlines parking standards for hotels at 1 space per bedroom and 1 space per 2 staff. In line with this guidance, it is considered that a provision of 39 spaces is sufficient. SPG4 provides further guidance whereby developments exceeding 20 bedrooms should make suitable provision for coaches, either in the form of a drop off and pick up facility or coach parking contained within the allocated spaces for car parking.

Access

The proposal seeks to change the existing separate entry and exit arrangements to provide a standard priority T-junction, which will provide access to the hotel and the self storage unit. Tracking has been provided to illustrate access and movement for refuse freighters, a large transit and a large private car. It would be reasonable to assume that a number of users would utilise a trailer to move items to and from the site.

I am concerned about conflicts that may arise with pedestrians crossing in close proximity to a number of different vehicles. It would be more beneficial to site a pedestrian access gate closer to the access to the self storage. The two uses will be utilised in different ways, and it does not seem appropriate for pedestrians for the self storage to utilise the hotel access and walk through the car park.

The proposed dropped kerb and tactile paving should be sited where it will be easily manoeuvred by partially sighted and blind individuals. The movement lines should not cause confusion with movement into the main carriageway. The access will be subject to a separate Section 38 Agreement.

Trip Generation

A traffic survey was undertaken at the existing access junction on Friday 21 June 2019, and recorded vehicle trips entering and exiting the site during the AM and PM periods. The peak period saw a maximum of 14 trips. The data from the survey has been utilised to look at the trips for the proposed hotel, which will have fewer rooms. As previously noted, I do not consider this data to be robust and will require a TRICS analysis as a comparison or a larger survey over a number of days.

TRICS has been interrogated to establish the trip rates for the proposed self storage B8 unit. The proposal could generate a maximum of 14 two way trips per hour. The net trips for both the hotel and storage uses provides a maximum of 12 two way trips during the evening peak.

I suggest the following amendments / further information required:

- ☐ Suitable provision should be made for coach parking, either as a drop off pick up facility or

contained within the allocated car parking spaces.

- ☐ The pedestrian access gates for the self storage should be moved to remove potential conflicts.
- ☐ TRICS data for hotels of a comparable size and location should be utilised to establish vehicles trips. The survey data provided is not robust.

Second response:

Further to my previous comments dated 4 March 2020, a Transport Addendum Note has been submitted. As with previous comments, this is in relation to both applications for the reconfiguration of the existing hotel and the redevelopment of the overspill carpark to provide B8 self storage units.

Conference facilities have been removed from the proposal. As such I consider that the parking provision proposed is sufficient. While I questioned the robustness of the submitted parking survey, the removal of the conference facility allays concerns regarding the parking provision. As such, I am minded to accept the proposed parking.

As noted above, conference facilities have been removed from the proposal. The applicant deems that a coach parking space would not be deemed necessary given the change in configuration. I suggest a condition requesting a Parking Management Plan identifying how coaches can be accommodated, or a Condition prohibiting their use.

As previously noted, it is reasonable to assume that self storage site will be accessed by vehicles with trailers. The storage facility provides two large spaces adjacent to the building, which can accommodate vans. Trailers are envisaged to be detached at one of these spaces and moved to another parking space.

I maintain that that it would be preferable for dedicated pedestrian access to be provided for the self storage unit. While it is unlikely for any conflicts to occur, I would prefer for any potential to be removed. This would require a simple pedestrian access at the Hever Court Road frontage.

TRICS has been interrogated to establish trip rates for the hotel. It is clear that the reduced hotel function, and the removal of the conference facility would see a reduction in overall trip rates which is acceptable.

In line with the above I confirm that I am satisfied that the queries have been answered and raise no objection on behalf of the highway authority. I suggest the following conditions:

The prohibition of coaches utilising the site, or the submission of a Parking Management Plan prior to

Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

Completion and maintenance of the access shown on the submitted plans prior to the use of the site commencing.

Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.

All Electric Vehicle chargers provided for homeowners in residential developments must be

provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>

INFORMATIVE: It is the responsibility of the applicant to ensure, before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Third response:

Further to my previous response dated 22 April, I note that an updated plan 'General Arrangement of Site Layout and Access Proposals' has been submitted outlining a new pedestrian gate for the self storage unit. The proposed gate means that pedestrians would take a route behind the motorcycle parking bays to a further gate to enter the self storage unit. I am unsure as to why a single gate cannot be provided accessing directly into the unit. However, the solution provided is more satisfactory and reduces any potential of conflicts occurring.

With regard to the pre-commencement conditions, I am minded to suggest that the parking and access conditions are applied prior to first occupation.

The submission of a Parking Management Plan prior to the use of the site commencing.

Provision and permanent retention of the cycle parking facilities shown on the submitted plans prior to the first occupation and shall be permanently retained thereafter.

Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the first occupation and shall be permanently retained thereafter.

The revised access arrangements, including pedestrian access, shall be provided in accordance with the approved plans prior to the first occupation, and shall be permanently retained thereafter.

Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

NB the advice set out in the four final paragraphs of the Second response is repeated.

GBC Planning Policy Manager

No comments.

Health and Safety Executive

HSE's Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.

Natural England

Thank you for consulting Natural England on the HRA for the proposals at Manor Hotel. However, the planning statement indicates that the proposal is to reconfigure the hotel rooms to reduce the number from 64 to 34. Therefore, the proposals do not appear to result in a net increase in bedroom capacity and visitor numbers that would increase recreational disturbance to the nearby European sites.

On this basis, Natural England's view is that the proposal would not have a likely significant effect on the European sites, and so no mitigation measures, or Appropriate Assessment, are necessary.

Environment Agency

We have not received any information on the foul drainage proposed for this development.

Drainage may be restricted in a source protection zone or over an aquifer where groundwater is at shallow depths. Foul drainage should be discharged to mains sewers where possible. If alternatives are being explored then developers should check the .Gov website for Binding Rules information for small scale non mains discharges, (see link in document below). Submissions to the LPA should include all relevant information on foul drainage proposals using the following form.

<https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

Developments where there is available connection to foul sewer cannot generally use non mains drainage.

We would require details of all proposed foul and surface water drainage to be clarified and submitted with this application.

Otherwise we would seek the following condition:

Condition:

Development here by approved shall not commence until a foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented with a connection to foul sewer, has been submitted to and approved by, the local planning authority in consultation with the water undertaker and EA. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy. No occupation of any premises can take place until the installed scheme is confirmed as meeting the agreed specifications and connections are made to the SW network.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

Kent County Council Heritage Conservation

Thank you for your letter consulting us on the above planning application for minor external alterations to existing hotel including reduction in car parking area.

The application site lies within an area of archaeological interest with evidence for human activity from prehistoric periods to the present day. The site lies adjacent to the line of the Roman Watling Street with the potential for below ground archaeological remains associated with the road and adjacent activity of Romano-British and subsequent date. The proposed works are, however, relatively limited in terms of below ground impacts and therefore I recommend the following condition is placed on any forthcoming consent:

AR4 No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that the excavation is observed and items of interest and finds are recorded. The watching brief shall be in accordance with a written programme and specification, which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded.

The watching brief would be for the proposed works associated with the carpark area and not those immediately adjacent to the hotel building.

No response has been received from the following consultees:

National Grid
West Kent Public Rights of Way
GBC Economic Development Manager
Thames Estuary Partnership
Thames Defence Heritage

Neighbouring properties

The application was publicised by a newspaper advertisement and a site notice and to 18 neighbouring properties by letter. No representations have been received.

It should be noted that a Public Right of Way (PROW), runs across the application site. As such, the proposed development has been publicised by a site notice and in a local newspaper.

Analysis

This application is one of two that have been submitted involving proposed developments at The Manor Hotel, Singlewell Road (references 20200104 and 20200105).

In this application, planning permission is sought for;

- Alterations to the existing vehicle and pedestrian access;
- Demolition of a single storey laundry facility and formation of a terrace;
- Erection of a new corridor link on the southern elevation;
- A reduction in the size of the car park from 101 spaces to 39 spaces (the gravel overspill car park would be removed);
- Removal of an entrance and small gable end roof feature from the front (eastern) elevation;
- Erection of a small dormer and insertion of a four panel roof light in the front (eastern) roof slope;
- Erection of three dormers in the southern side roof slope;

- Internal alterations to upgrade and increase room sizes;
- Internal alterations to provide a resident gym, modern dining area, outside terrace and to reduce the size of meeting rooms; and
- A reduction in the total number of bedrooms from 64 to 34 (8 standard rooms, 17 larger suites and 9 executive apartments for longer stay visitors).

Planning application reference 20200105 relates to the redevelopment of an existing overspill car parking area at the hotel, to erect a four storey building to be used for B8 self-storage purposes. The applicant states that the development proposed in application 20200105 would facilitate the proposed alterations to the hotel set out in this application.

Appropriateness of the development in principle

Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 prioritises development in the urban area as a sustainable location and promotes the redevelopment and recycling of underused, derelict and previously developed land. Policy CS07 of the Gravesham Local Plan Core Strategy September 2014 supports the refurbishment and upgrading of existing industrial and commercial premises to facilitate more flexible working practices and changing economic needs. Policy CS09 of the Gravesham Local Plan Core Strategy September 2014 seeks to maximise opportunities for expansion in culture and tourism activity in the Borough and to protect and support improvements to existing cultural and tourist facilities.

The applicant has advised that due to reductions in occupancy levels and average daily room rates in recent years, the viability of the hotel has decreased. In addition, social change in the event and function market sector has led to the existing function suites being under utilised. As such, the existing hotel (with 64 bedrooms, large areas of business/function accommodation and other ancillary uses) is not viable.

The proposed development would amend and upgrade the accommodation and facilities at an existing hotel and as such, would be in line with Policies CS02, CS07 and CS09 of the Gravesham Local Plan Core Strategy September 2014 and be acceptable in principle.

As the applicant has indicated that the proposed works to the hotel would be facilitated by the proposed development of the land currently used as a car park and because the proposed storage facility would result in the loss of existing car parking for the hotel, both applications are intrinsically linked. As such, the following discussion has been written with this in mind.

The following paragraphs consider the proposed development in detail and make an assessment of the specific impacts of the proposal.

Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires that new development is well designed and respects the character and appearance of surrounding area.

The southern edge of the application site is located in the Gravesend Southern Fringe Landscape Character Area and as such, Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications. In relation to the Gravesend Southern Fringe Landscape Character Area, this document states that the overall condition of the landscape is poor and that it has moderate sensitivity. It recommends that a new landscape identity and function should be created and that the fragmented landscape should be restored.

The application site is located in an urban area, close to the A2 trunk road. Planting on the site

frontage and rear boundary softens the built form and screens some of the hotel building from public view. The proposed development would not alter the commercial nature of the application site and would reduce the footprint of the hotel building (by virtue of the demolition of a single storey extension). A new link corridor and various dormers and external alterations would be erected and be of a design that matches the existing building. No details of the proposed facing materials have been submitted but these can be subject to condition (requiring them to match existing).

The application site has various areas of mature planting (mostly on the boundaries) and it is not clear how much of this would be retained. The proposal would involve alterations to the car park and site entrance but no detail of the proposed hard surfacing or boundary treatments have been provided. Therefore to protect visual amenity, conditions should be attached to any planning permission granted to ensure that these details are submitted and approved.

Overall it is considered that the proposed development would be appropriate in terms of design and would not detract from landscape character. As such, the proposal would be in line with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy September 2014.

Amenity of Future Occupiers

The proposed development would result in improvements to the rooms and facilities at the hotel. Room sizes would be increased and a central terrace, gym and modernised restaurant would be provided and as such, the amenity of future hotel occupiers would be enhanced.

Neighbouring Amenity

The closest residential properties to the application site are no. 1 Ruffets Wood and nos. 1, 2 and 3 Hever Court Cottages (located to the north of the hotel building) and nos. 5 and 6 Kilndown (located to the north of the hotel entrance).

Due to the distance between the properties and the application site and because much of the proposed development would be screened from view, it is considered that the proposal would have no adverse overlooking, overshadowing or overbearing impacts to surrounding occupiers.

The application site would remain in use as a hotel (albeit with amended facilities) and as such, there would be no adverse noise or disturbance impacts to surrounding residential occupiers.

Overall it is considered that the proposed development would have no adverse impacts to residential amenity and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Parking and Highways

The application site has 101 existing parking spaces (78 in the main car park and 23 in the overspill area). The site entrance has an 'in and out' arrangement with an automatic barrier and the overspill car park is separated from the main parking area by fencing, hedges and a gate. The site is accessible by walking, cycling and public transport but due to the proximity to the strategic road network, the majority of customers would utilise the private car.

The proposed development would reduce on-site parking to 39 spaces, remove the in and out access arrangement and reduce the number of rooms at the hotel to 34. The proposal would create space which is proposed to be used to provide a self-storage facility (on the overspill parking area and land to the east). Following requests from the GBC Highway Development Management Officer, Kent Highways and Highways England, the applicant has provided additional traffic and parking information to justify the two proposals.

The hotel would be reduced in capacity and therefore would generate less vehicle movements and require less parking. The proposed access and parking arrangements for the hotel and the storage building would be appropriately designed and of sufficient capacity. No objection has been raised from GBC Highway Development Management Officer, Kent Highways and Highways England, provided that appropriate conditions are attached to any planning permission granted to ensure that the development is constructed and operated without adverse impacts to highway safety (including the submission and approval of details of the alterations to the vehicle and pedestrian access, a parking management plan for the hotel and a construction management plan).

In order to ensure that there would be no adverse highway safety impacts, it would be imperative to ensure that the proposed alterations to the hotel layout are undertaken prior to any alteration of the car park area. This is because a reduced demand for parking at the hotel would be contingent upon the proposed re-configuration to reduce the number of rooms. Furthermore the works to re-configure the hotel must be completed prior to the commencement of the self-storage development. This is because the loss of the overflow car park, prior to a reduction in parking demand, may lead to adverse highway safety impacts. Planning conditions can be used to ensure that the timing of all the proposed works is appropriate.

Overall it is considered that the proposed development would have no adverse impacts on highway safety and it would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1, T5 and P3 of the of the Gravesham Local Plan First Review November 1994.

Impacts on the Thames Estuary and Marshes Special Protection/Ramsar Site

The application site falls within 6 km of the Thames Estuary and Marshes Special Protection Area (SPA). However the proposed development would not result in an increase in bedroom capacity or visitor numbers that would increase recreational disturbance to the nearby European sites. Therefore Natural England has advised that the proposal would not have a significant effect on the European sites and that no mitigation measures or Appropriate Assessment are necessary. As such, it is considered that there would be no adverse impacts to protected habitats and the proposed development would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy September 2014.

Groundwater Protection Zone

The application site is located in Groundwater Protection Zone 3. The Environment Agency has requested the provision of foul drainage details before the development commences. Therefore, provided that an appropriately worded planning condition is attached to any planning permission granted, the proposed development would have no adverse impacts to groundwater and it would be in line with Policy CS18 of the Gravesham Local Plan Core Strategy September 2014.

Biodiversity

Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought within new development.

The proposed development comprises of alterations to existing built form at an established hotel and as such, there would be no net loss of biodiversity. A landscaping scheme can be required to be submitted and approved to ensure that any opportunities for enhancing habitats at the application site are undertaken. As such, the proposed development would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy September 2014.

Area of Archaeological Potential

The application site is within an area of archaeological interest, with evidence for human activity from prehistoric periods to the present day. As such, Kent County Council Heritage Conservation requires the implementation of an archaeological watching brief (to cover the works to the car park). As such it is considered that, provided an archaeological watching brief condition is imposed, there would be no adverse impacts to archaeology and the proposed development would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy September 2014.

Air Quality Management Area (AQMA)

The application site is located in the A2 Trunk Road AQMA. As the proposed development would involve alterations to an existing hotel, it is considered that there would be no adverse air quality impacts and the proposed development would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Gas Pipelines

The application site is located in close proximity to existing gas pipelines (to the north and south). No objection has been raised by the Health and Safety Executive but no response has been received by National Grid. It is noted that no significant groundworks are proposed to be undertaken but due to the proposed amendments to the site entrance, the northern pipelines in particular should be drawn to the attention of the applicant, by way of an informative attached to any planning permission granted.

Public Rights of Way (PROW)

PROW reference NS365 runs to the south of the southern boundary of the application site and would be unaffected by the proposed development.

The PROW map indicates that PROW reference NG16 crosses the application site. However there appears to be no such PROW on the ground (due largely to the existence of the hotel building). As this is an existing situation, it is considered that the proposed development would not have an adverse impact on NG16.

Suggested Conditions

Time limit

Development in accordance with the approved details

Approval of Construction Management Plan pre-commencement

Approval of a parking management plan pre-commencement

Approval of foul drainage strategy pre-commencement

Archaeological watching brief pre-commencement of any works to the car park.

Works to reduce the number of bedrooms and re-configure the hotel facilities shall be completed prior to commencement of works to reduce the capacity of the car park

Approval of vehicle and pedestrian access arrangements prior to first use

Approval of hard landscaping and boundary treatments prior to first use

Approval of soft landscaping prior to first use

Use as Class C1 hotel only

Materials to match existing

Provision and retention of approved parking spaces

The development shall be completed prior to the commencement of 20200105

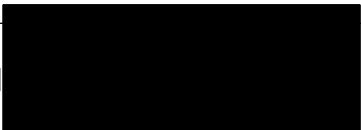
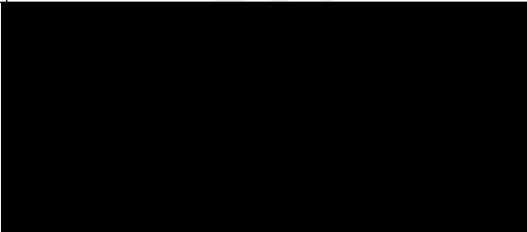
Conclusion

The proposed development would amend and upgrade the accommodation and facilities at an existing hotel and be of appropriate design. There would be no adverse impacts to the character of the surrounding area, highway safety, residential amenity, groundwater, biodiversity, archaeology, air quality or the PROW network.

Recommendation:

Permission subject to conditions.

See draft Decision

Case Officer: Mrs Kelly Joyce	Team Leader: Myles Joyce
Signed: 	 Service Manager - Development Management
Dated: 10 June 2020	Dated: 11 June 2020