



**“St James House,
6-8 Overcliffe,
Gravesend,
DA11 0HJ”**

Planning Statement

OCTOBER 2024



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Gravesend,
DA11 0HJ"**

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1.0 INTRODUCTION AND SCOPE OF APPLICATION

Introduction

- 1.1 This Statement has been prepared by Directive Planning and Developments Ltd ("the Agent"), on behalf of Tower Group Developments Ltd ("the Applicant"), in support of an application for a full planning application to Gravesham Borough Council ("the LPA") for a residential development at St James House, 6-8 Overcliffe, Gravesend, DA11 0HJ ("the Site").
- 1.2 The proposed development is described as follows:
- "Demolition of Class E storage building to the rear and change of use from office building (E-Class) to 13x one bedroom self-contained flats with associated landscaping, boundary treatments, 13x car parking spaces and refuse and cycle stores."***
- 1.3 The purpose of this document is to set out the background information regarding the Site and its context, whilst also highlighting its planning history and any other matter that is to be considered a material consideration for the determination of the application.
- 1.4 In addition, this document will provide a comprehensive analysis of the planning context referencing the Gravesham Borough Council Development Plan, the National Planning Policy Framework (2023) and any other relevant supplementary planning guidance documents.
- 1.5 This document and the accompanying application are supported by relevant architectural drawings.

Scope of Application

- 1.6 This document is divided into eight main sections, and the relevant sections are set out as follows:
- **Section 2.0** (Application Site and Surrounding Context);
 - **Section 3.0** (Relevant Planning History);
 - **Section 4.0** (Current Configuration);
 - **Section 5.0** (Proposed Development);



- **Section 6.0** (Planning Policy Context);
- **Section 7.0** (Planning Assessment); and
- **Section 8.0** (Conclusion).

Supporting Documents

- 1.1 This document should also be read alongside the following submitted drawings:

Document Name
Completed Application Form and Certificate A; Covering Letter (produced by Directive Planning and Developments Ltd); and Transport Statement Note (produced by Directive Planning and Developments Ltd)

Supporting Drawings

- 1.2 This document should also be read alongside the following submitted drawings:

Drawing Name	Drawing Reference
Existing Ground Floor Plan	Existing Plans
Existing First and Second Floor Plan	Existing Elevations
Existing Front and Side Elevation	Proposed Plans
Existing Rear and Side Elevation	Proposed Elevations
Proposed Ground Floor Plan	Existing and Proposed Parking-Garden Plan



2.0 APPLICATION SITE AND SURROUNDING CONTEXT

Application Site

- 2.1 St James House, located at 6-8 Overcliffe, Gravesend, DA11 0HJ, is a prominent mixed-use building situated on a busy arterial route into Gravesend's town centre. St James House is a three-storey with lower ground floor level E-Class office building located prominently on Overcliffe in Gravesend. The building is set slightly back from the main road, allowing for some off-street parking in the front and to the rear, a feature that supports its commercial functionality.
- 2.2 The building was constructed in 1965 and architecturally reflects the utilitarian design typical of mid-20th century commercial structures, featuring a brick façade with large rectangular windows that allow natural light into the office spaces. The existing layout is practical, and optimised for commercial use, with internal spaces divided into various offices to accommodate multiple businesses. Planning history once dictated that the building in the late 70's was in use as an adult education centre, however since 2008 at the very latest, the building was operating under office usage.
- 2.3 The Site is classified as being in Flood Zone 1, which indicates a very low risk of flooding, with a less than 1 in 1,000 annual probability of flooding from rivers or the sea. There are no Listed Buildings or Structures on the Site, however, the property is located within the Overcliffe Conservation Area.



Figure 1: A Street View image of the Site bounded in red. (Source: Google Maps, 2022)



Surrounding Context

- 2.4 Overcliffe is a key road and area situated within the town of Gravesend in Kent, running parallel to the River Thames. The road itself forms part of a larger network connecting the town centre to various residential and commercial zones. Overcliffe's strategic location makes it an essential route within Gravesend, linking directly to major transport hubs, including Gravesend railway station, which offers fast links to central London.
- 2.5 The area is primarily characterised by a mixture of commercial properties, including office buildings, small businesses, and local amenities, as well as residential dwellings. The surrounding context of the Site is experiencing a surge in redevelopment, with several nearby properties undergoing transformations that include both residential and commercial elements. This aligns with the broader trend in Gravesend toward urban renewal, positioning the Site as part of a growing and evolving neighbourhood that aims to balance heritage with modern development.
- 2.6 Gravesend's close proximity to London, combined with its historic and cultural significance, has positioned it as a desirable location for both businesses and residents. Its transport connections, including high-speed rail links to London St Pancras and proximity to the A2 and M25 motorways, make it a well-connected town that balances the appeal of suburban life with the convenience of city access.

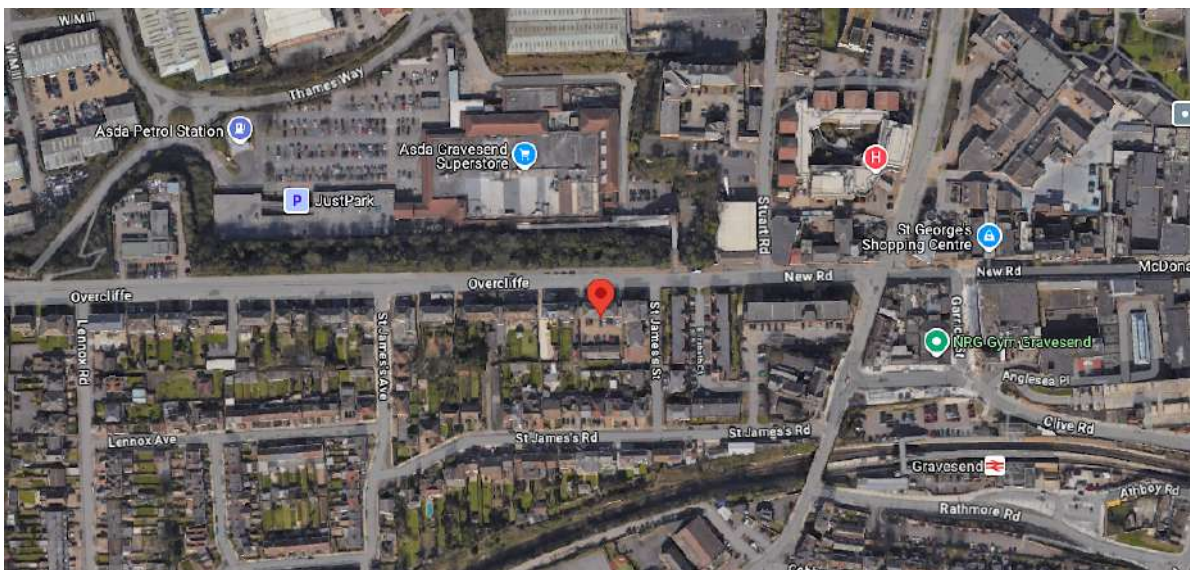


Figure 2: A satellite image of the Site pinned in red and the surrounding context. (Source: Google Maps, 2024)



3.0 THE PROPOSED DEVELOPMENT

Introduction

- 3.1 The submitted full planning application seeks permission for the following proposed development:

"Demolition of Class E storage building to the rear and change of use from office building (E-Class) to 13x one bedroom self-contained flats with associated landscaping, boundary treatments, 13x car parking spaces and refuse and cycle stores."

- 3.2 The proposed development seeks full planning permission for the demolition of a Class E storage building situated at the rear of the Site and the conversion of the existing office building (also Class E) into 13 one-bedroom, self-contained flats. This proposal aims to provide much-needed residential units in a highly sustainable and accessible urban location near Gravesend Town Centre, contributing to the local housing supply while retaining key elements of the Site's existing layout and character.
- 3.3 The unit breakdown is as follows:
- 9x 1-bed/1person units; and
 - 4x 1-bed/2-person units
- 3.4 The external alterations to the buildings are as follows:
- Replacement 2x front windows to timber sash; and
 - Replacement 5x rear windows to timber sash;
- 3.5 The proposed development involves significant enhancements to the Site's layout and functionality. The creation of 13 flats introduces a high standard of living, each designed to provide modern, comfortable accommodation. The flats will be equipped with all the necessary amenities and meet the local demand for high-quality residential units. The conversion of the existing office building preserves the Site's structure while adapting it to a new, residential use, allowing for the efficient use of the existing urban fabric.
- 3.6 The proposal also includes associated landscaping and boundary treatments designed to enhance the visual appeal of the site. 13 off-street parking spaces will



be provided to the rear of the property, ensuring each flat has a dedicated parking space. The design of the parking area minimises its impact on the streetscape, preserving the aesthetic character of the property and the surrounding area. This layout also ensures ease of access for residents while maintaining the Site's overall functionality.

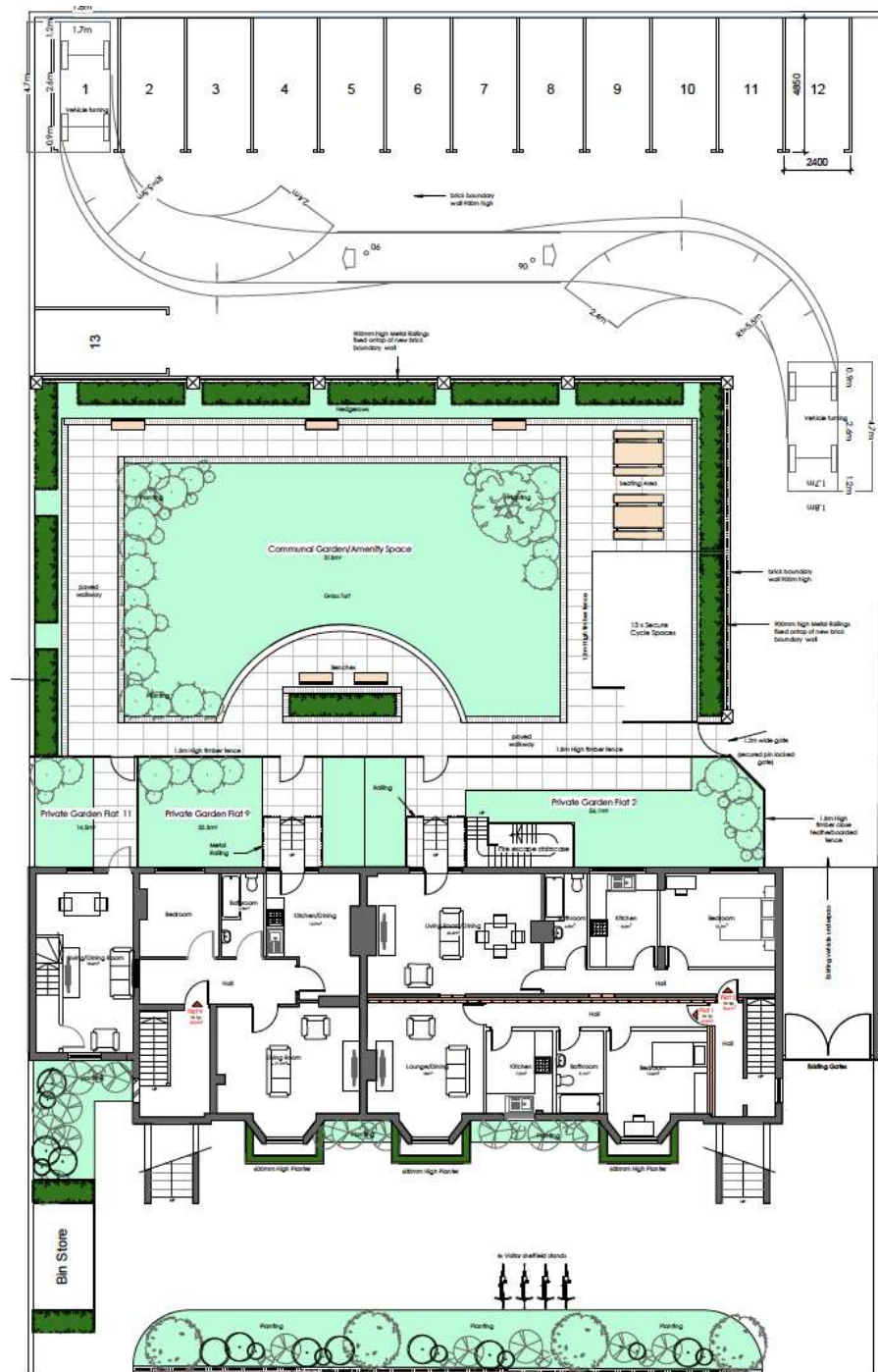


Figure 3: Extract denoting proposed garden and parking plan. (Dwg. Ref: PL-01-68OC-SD104)



- 3.7 Cycle storage will be located within the communal amenity space at the rear of the property, secured behind a gated area. This storage facility is designed to offer secure, long-term cycle parking for residents, encouraging the use of bicycles as an alternative, sustainable mode of transport. The cycle storage area will be easily accessible but discreetly located to ensure it does not detract from the overall appearance of the site. In addition to the resident cycle storage, visitor cycle stands to the front of the property will be provided, further promoting cycling as a convenient and eco-friendly travel option for both residents and guests.
- 3.8 Waste management is another important aspect of the development. Refuse storage will be located at the front of the property, offset from the boundary to ensure efficient access for collection services while maintaining the visual integrity of the streetscape. The waste store will be secure, covered, and screened by landscaping, ensuring it remains unobtrusive and blends seamlessly with the site's overall design. This setup allows for efficient refuse collection and management while aligning with local planning standards for waste storage and sustainability.
- 3.9 The proposal also incorporates several features to ensure the development's environmental sustainability. Landscaping plays a key role in enhancing the aesthetic appeal of the site, with thoughtful planting around the parking area and other communal spaces to soften the appearance of the development. The use of modern and period materials for boundary treatments and fencing further ensures that the development adheres to best practices in environmental design, while also enhancing the privacy and security of residents.
- 3.10 The demolition of the Class E storage building at the rear facilitates the Site's transformation into a residential area, opening up space for the provision of private and communal outdoor areas for the residents. These outdoor spaces will be designed to be functional and attractive, offering residents a high-quality environment in which to live and relax. The introduction of amenity spaces within the development not only enhances the residents' quality of life but also contributes to the overall visual appeal and functionality of the Site.
- 3.11 In addition to these provisions, the development remains sensitive to its urban



surroundings. The conversion respects the residential character of the area, ensuring that the residential units integrate seamlessly with the surrounding residential dwellings whilst improving its functionality and meeting modern planning requirements.

- 3.12 The proposed development represents a sustainable and efficient use of land, aligning with local planning policies that promote urban regeneration and the effective reuse of existing buildings. By introducing 13 high-quality residential units to the area, the development supports Gravesend's housing strategy while ensuring the Site remains vibrant, functional, and aesthetically integrated with its surroundings.



4.0 PLANNING POLICY CONTEXT

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application be determined according to the development plan unless material considerations indicate otherwise.
- 4.2 The statutory development plan for the Site comprises of:
- Gravesham Local Plan (2014);
 - Gravesham Local Plan: First Review (1994)
 - Gravesham Local Plan Policies Map (2014)
- 4.3 Other relevant documents and guidance include the National Planning Policy Framework (2023), the National Planning Practice Guidance (2023), the Technical Housing Standards (2015), the Kent Vehicle Parking Standards (2006), the Overcliffe Conservation Area Appraisal (2009), Management Plan - Suburban Conservation Areas (2009); and SPG2 – Residential layout guidelines including Housing Standards Policy Statement (2020).
- 4.4 Assessment of the aforementioned policies will be discussed in the remainder of this document.

Relevant Planning Policies

- 4.5 The key planning policies relevant to the proposal are:

Gravesham Local Plan (2014)

- Policy CS01 (Sustainable Development); and
- Policy CS02 (Scale & Distribution of Development);
- Policy CS12 (Green Infrastructure);
- Policy CS14 (Housing Types and Sizes);
- Policy CS15 (Housing Density);
- Policy CS18 (Climate Change);
- Policy CS19 (Development & Design Principles);
- Policy CS20 (Heritage);

Gravesham Local Plan: First Review (1994)

- Policy P3 (Vehicle Parking Standards); and
- Policy T1 (Impact of Development on the Highway Network);
- Policy TC3 (Development Affecting Conservation Areas)

4.6 Assessment of the aforementioned policies will be discussed in the remainder of this document.

Planning Policy Site Designations

4.7 After searching through the Gravesham Local Plan Policies Map (2014), it is clear that there are designations constraining the Site as denoted below:

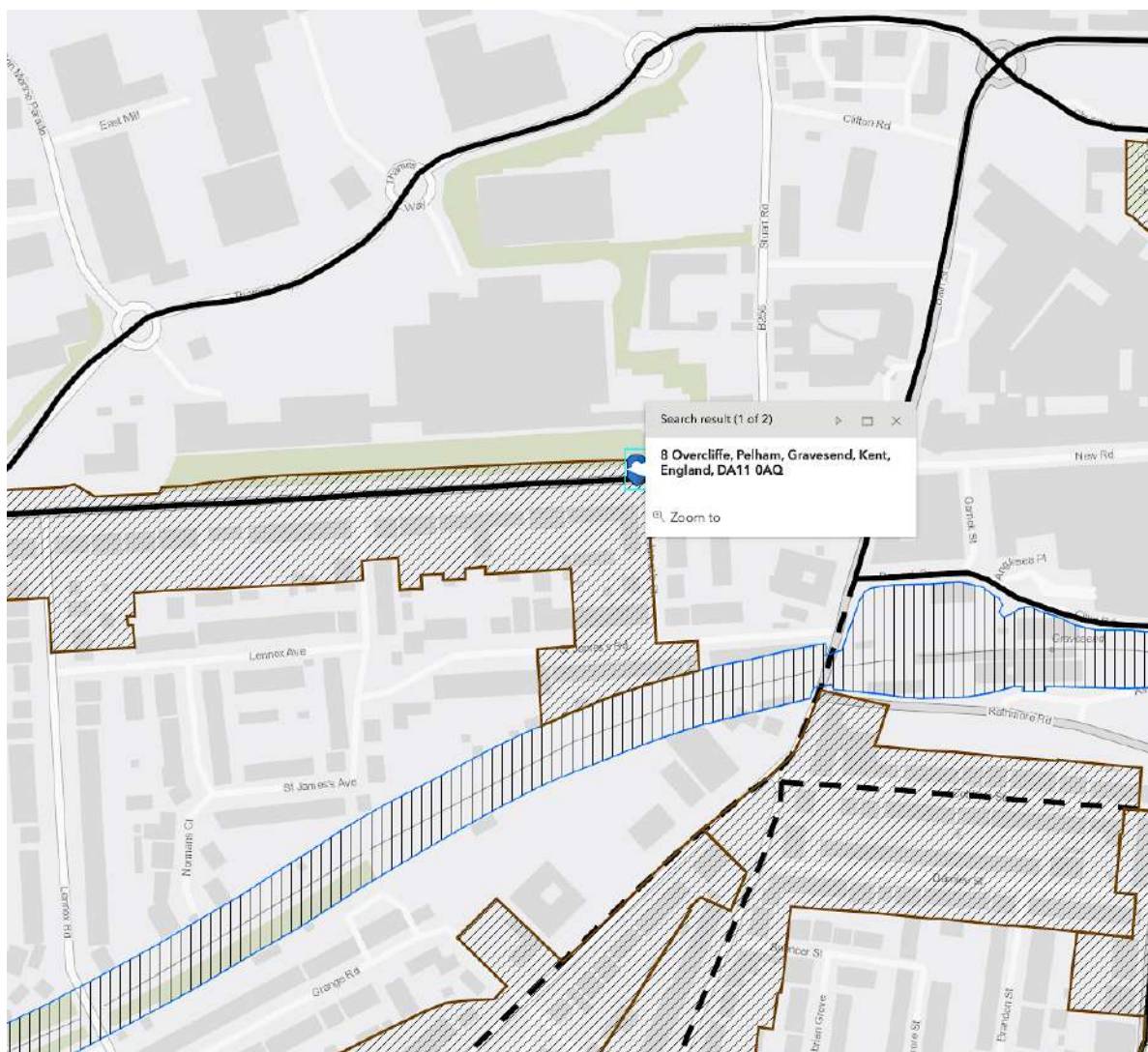


Figure 4: Policies Map with Site pinpointed in blue. (Source: Gravesham District Council, 2014)



- 4.8 The above Policy Map and its designations have been reviewed in relation to the following planning constraints:

Constraint	Yes/No
Article 4 Direction (HMO)	No
Listed Building	No
Conservation Area (Overcliffe)	Yes
Flood Zone (2 or 3)	No



5.0 PLANNING ASSESSMENT

5.1 This section provides an assessment of the proposed development against relevant national, regional, and local planning policies and other material considerations. The following issues are key to this planning application and are considered in turn below:

- (i) ***Housing Land Supply and Targets***
- (ii) ***Principle of Development;***
- (iii) ***Design, Character and Appearance;***
- (iv) ***Quality of Accommodation;***
- (v) ***Impact on Neighbouring Amenity;***
- (vi) ***Parking and Highways;***
- (vii) ***Waste Management; and***
- (viii) ***Ecology and Biodiversity;***

(i) Housing Land Supply and Targets

(a) Five-Year Housing Land Supply

5.2 The National Planning Policy Framework (2023) mandates that all Local Planning Authorities (LPAs) maintain a deliverable five-year housing land supply to meet local housing needs. In the case of Gravesham Borough Council, the Housing Delivery Action Plan (2020) highlights a critical shortfall in housing land availability. From 2020 to 2025, Gravesham's five-year housing requirement is 3,930 homes, including a 20% buffer due to persistent under-delivery. However, the borough can only demonstrate a land supply of 2,574 homes, equating to just 3.27 years of housing supply. This figure underscores the borough's struggle to meet its housing targets and the pressing need for new developments, particularly on previously developed or brownfield sites within urban areas.

5.3 The proposed development at 6-8 Overcliffe responds to this shortfall by providing thirteen (13) self-contained flats in a sustainable, urban location. By reusing an existing office building, the proposal aligns with Gravesham's strategic focus on urban regeneration and efficient land use. The redevelopment of brownfield sites like



this is critical to meeting Gravesham's housing needs, as the borough's rural areas are largely protected by Green Belt policies, limiting the availability of new development land.

(b) Housing Delivery Test

- 5.4 The Housing Delivery Test (HDT), introduced by the National Planning Policy Framework, measures an LPA's ability to meet housing targets over a three-year period. Gravesham's performance has been suboptimal, with the latest HDT results (2020) indicating that the borough delivered only 70% of the required homes between 2017 and 2020. As a result, Gravesham is subject to both a 20% buffer on its five-year land supply and the "*presumption in favour of sustainable development*." This means that planning applications for residential developments should generally be approved unless there are significant adverse impacts.

(c) Presumption in Favour of Sustainable Development

- 5.1 The Government's approach as per Section 2, Paragraph 2 of the National Planning Policy Framework (2023) refers to the presumption in favour of sustainable development, a core principle which is triggered when a local authority fails to meet its housing delivery requirements, as is the case with Gravesham Borough Council. According to the most recent Housing Delivery Test, Gravesham has delivered less than 75% of the housing required over the past three years.
- 5.2 As a result, under Paragraph 11(d) of the National Planning Policy Framework (2023), the housing delivery element of Policy CS02 of the Gravesham Local Plan (2014), must be considered out of date. This triggers the presumption in favour of sustainable development, meaning that planning permission should be granted unless:
- Policies in the National Planning Policy Framework (2023) that protect specific areas or assets of particular importance, such as Green Belt, Sites of Special Scientific Interest, or Designated Heritage Assets, provide clear reasons for refusal, or;
 - The adverse impacts of the development would significantly and demonstrably



outweigh the benefits when assessed against the National Planning Policy Framework (2023) as a whole.

- 5.3 Therefore, Gravesham Borough Council is required to apply a weighted balance in favour of development due to the shortfall in housing delivery where the presumption in favour of development explicitly outweighs the provisions of the development plan in order to address the shortfall in supply in advance of the development plan review. Such circumstances prevail in Gravesham.
- 5.4 In the context of 6-8 Overcliffe and the council's requirement to apply a weighted balance in favour of development due to the shortfall in housing delivery, consideration of: 1) how the proposal contributes towards alleviating this shortfall, alongside its compliance with other National Planning Policy Framework (2023) requirements; and 2) the need to enhance the quality and character of the area and ensure acceptable living conditions for future residents is required.
- 5.5 Although the proposed development would offer a moderate contribution towards addressing local housing needs, the council must also evaluate other material considerations, such as the suitability of the unit mix and design in line with Paragraphs 131 and 135 of the National Planning Policy Framework (2023), which emphasise the need for developments to be visually attractive, sympathetic to the local character, and provide adequate amenity.

(d) Conclusion

- 5.6 The presumption in favour of sustainable development provides a strong basis for supporting this application at 6-8 Overcliffe, as it seeks to address the borough's housing shortfall by providing 13 residential flats, contributing directly to the borough's housing deficit without harming environmental or community interests. The proposed development makes efficient use of an existing building, minimising the need for new land and infrastructure while contributing positively to the local housing stock.
- 5.7 Gravesham's housing needs are projected to increase significantly over the coming years. According to the Gravesham Local Plan (2014), the borough will require an



additional 655 homes per year from 2020 to 2036 to meet its housing demand. This development, though modest in scale, aligns with the council's broader goals of urban regeneration, sustainable development, and the efficient use of previously developed land.

(ii) Principle of Development

- 5.8 The proposed development involves the conversion of an existing building into residential use, and as such, the assessment of the principle of development must be based on the relevant planning policies governing change of use and residential development. The accompanying demolition of the office storage building at the rear is considered acceptable and necessary to facilitate the successful conversion of the retained building. This demolition enhances the overall feasibility of the development by freeing up space for improved site layout and ensuring that the proposed conversion complies with both local and national planning objectives.
- 5.9 Policy CS14 of Gravesham's Local Plan (2014) emphasises the need to provide a variety of dwelling types and sizes, ensuring developments respond to local housing needs and contribute to the creation of sustainable, balanced communities. This policy aligns with the National Planning Policy Framework (2023), which encourages the provision of housing that meets local demand and supports community vitality.
- 5.10 Policy CS15 of Gravesham's Local Plan (2014) encourages residential densities that are appropriate to the scale of the building and the surrounding urban context.
- 5.11 Saved Policy H5(i) of the Gravesham Local Plan First Review (1994) states that buildings should be located in areas suitable for conversion, particularly in places where conversions to flats or multiple-occupancy units are prevalent.
- 5.12 Saved Policy H5 (ii) of the Gravesham Local Plan First Review (1994) also sets out that for a property to be suitable for conversion into smaller residential units, it must be of a size and arrangement that makes it inappropriate for continued single-family occupancy.
- 5.13 Taking the above into consideration, Overcliffe, being a busy arterial route into Gravesend town centre, is an area where properties have often been converted into



flats and maisonettes. The surrounding area is characterised by mixed-use buildings, and the proximity to the town centre enhances the Site's sustainability and accessibility.

- 5.14 In addition, the building at 6-8 Overcliffe also meets the requirements of Saved Policy H5 of the Gravesham Local Plan First Review (1994) as it is considered a substantial multi-storey building, exceeding two storeys and contains various rooms. Its size and internal layout, historically designed for office use, do not lend themselves well to a single-family residence. The structure's larger footprint and existing arrangement make it an ideal candidate for conversion into multiple smaller units, maximising its potential while aligning with housing demand trends in the area.
- 5.15 The proposed development for the Site includes the creation of 13 self-contained flats, which is consistent with the density requirements outlined in Policy CS15 of Gravesham Local Plan (2014). The conversion of 6-8 Overcliffe meets these expectations by providing a moderate number of units that optimise the use of the available floor space while ensuring the development remains compatible with the character of the area. The proposal effectively balances the need for housing with considerations of density, preventing the risk of overdevelopment in a location that supports such an intensification of use.
- 5.16 Furthermore, although the building is currently designated for commercial use, its location on the fringe of Gravesend town centre is highly favourable for residential conversion. The Site's proximity to transport links, services, and amenities makes it particularly suitable for residential occupancy. 6-8 Overcliffe benefits from easy access to Gravesend railway station and local bus routes, reducing the reliance on private vehicles and supporting the shift towards sustainable modes of transport. The Site's urban location ensures that future residents will benefit from the wide range of services available within the town centre, including retail, educational, and healthcare facilities.
- 5.17 Finally, given Gravesham's urgent need for housing, as previously evidenced by recent Housing Delivery Test results and the borough's ongoing shortfall in housing provision, the conversion of 6-8 Overcliffe will provide a timely contribution to the local



housing supply. The development also aligns with Policy CS02 of the Gravesham Local Plan (2014) which promotes broader objectives regarding housing growth within sustainable, well-connected urban areas. By redeveloping an existing building within the urban core, the proposal minimises the need for development on greenfield sites or within the Green Belt, aligning with national and local policy goals that emphasise sustainable urban regeneration and the efficient use of land.

- 5.18 Therefore, it is considered that the principle of development aligns with Policies CS02, CS14 and CS15 of the Gravesham Local Plan (2014), Saved Policy H5 of the Gravesham Local Plan First Review (1994) and the National Planning Policy Framework (2023), subject to further considerations regarding the design, quality of accommodation, impact on neighbouring amenity, and compliance with other relevant policies.

(ii) Design, Character, and Appearance

- 5.19 Section 12 of the National Planning Policy Framework (2023) focuses on ensuring that all developments are well-designed, contributing to the overall quality of the area. It stresses the importance of being visually attractive, functionally effective, and sympathetic to the local character, promoting sustainable, safe, and inclusive environments.
- 5.20 Section 16 of the National Planning Policy Framework (2023) emphasises the protection and enhancement of heritage assets, such as listed buildings and conservation areas. It requires any harm to these assets to be justified by substantial public benefits, with the reuse of heritage assets encouraged to ensure their preservation.
- 5.21 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act (1990) requires planning authorities to give special consideration to preserving or enhancing the character and appearance of conservation areas when deciding on development proposals, ensuring no harm is caused to their historical or architectural significance.
- 5.22 Policy CS19 of the Gravesham Local Plan (2014) requires that new developments in Gravesham integrate with and enhance the local environment, ensuring a high-



quality design that respects the area's character and preserves the natural and built environment.

- 5.23 Policy CS20 of the Gravesham Local Plan (2014) focuses on protecting and enhancing Gravesham's heritage assets, including listed buildings and conservation areas. Developments must avoid harming the historic environment and align with national heritage protection guidelines.
- 5.24 Saved Policy TC3 of the Gravesham Local Plan First Review (1994) mandates that developments in conservation areas must preserve or enhance their character. Proposals for new development or alterations should be sensitive to the area's historical and architectural significance, respecting the existing structures and streetscape.
- 5.25 The proposed development at 6-8 Overcliffe has been designed with great care and sensitivity, recognising its location within the Overcliffe Conservation Area. The design approach prioritises preserving and enhancing the character and appearance of this historically sensitive site, ensuring that the building remains harmonious with its surroundings and contributes positively to the architectural continuity of the area. The development's design reflects a commitment to safeguarding the conservation area's historical integrity while still allowing for the functional conversion of the building to residential use.
- 5.26 The alterations to the main building are intentionally minimal, focusing on retaining and respecting its original architectural features. The key changes involve the replacement of seven windows; two at the front and five at the rear. These windows will be replaced with timber sash windows, a choice that reflects a more traditional style and is consistent with the building's historical period. The introduction of these period-consistent fenestration elements significantly enhances the overall aesthetic of the building, ensuring that it aligns more closely with the conservation area's architectural standards. The careful selection of materials and design ensures that the alterations remain in keeping with the property's historic context.
- 5.27 Timber sash windows are a prevalent feature within the Overcliffe area, and their inclusion in this development strengthens the building's connection to the local



vernacular. By replacing the existing, mismatched windows with these traditional, high-quality features, the proposal ensures that the building maintains a cohesive architectural style. This enhances the building's ability to reflect its historical surroundings while also accommodating the functional requirements of the conversion to residential flats. The choice of timber sash windows ensures seamless integration into the building's façade, minimising visual disruption and allowing for the feasible introduction of habitable rooms within these spaces. Importantly, these changes have been designed to minimise any impact on the street scene, preserving the visual integrity of the Overcliffe Conservation Area and ensuring that the development respects its historical significance.

- 5.28 In addition to these modest external alterations, the development also includes the demolition of an office storage building located at the rear of the site. This building, which holds no architectural or historical significance, is being demolished to facilitate the conversion of the main structure into residential flats, making more efficient use of the available space. Positioned at the rear of the site and completely out of view from the public domain, the office building does not contribute to the character or appearance of the conservation area. Its demolition will not result in the loss of any features that are of historical or architectural importance. The removal of this non-significant structure is considered to have a neutral impact on the conservation area, as it does not affect any key views or contribute to the area's architectural heritage. Therefore, the proposed demolition is regarded as acceptable, supporting the overall conversion project while maintaining the conservation area's integrity.
- 5.29 It is considered that the proposed alterations and demolition strike a careful balance between facilitating modern residential use and preserving the historical and architectural integrity of the building and the surrounding area. The development will improve the building's functionality without compromising the conservation area's character, in full compliance with Policies CS19 and CS20 of the Gravesham Local Plan (2014), Saved Policy TC3 of the Gravesham Local Plan First Review (1994), Sections 12 and 16 of the National Planning Policy Framework (2023), and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.



(iii) Quality of Accommodation

- 5.30 Paragraph 135 of the National Planning Policy Framework (2023) emphasises that developments should be designed to function effectively, contributing to the long-term quality of an area through good architecture, layout, and landscaping. It encourages maximising the site's potential by incorporating a mix of uses, including green spaces, and supporting local facilities. Developments must also be safe, inclusive, and accessible, promoting well-being and providing high standards of amenity for users without negatively impacting community cohesion or safety.
- 5.31 Policy CS19 of the Gravesham Local Plan (2014) outlines the key principles guiding the development and design of new buildings in Gravesham. The policy emphasises that all new developments must integrate well with the local environment, enhancing the area's character while ensuring high-quality design. Developments are expected to deliver sustainable, safe, and inclusive environments. Policy CS19 also requires that all applications consider the impact on residential amenities and ensure that they are designed to accommodate the future needs of the community.

(a) Room Size Standards

- 5.32 All new housing proposals must provide an acceptable standard of living, considering the internal layout, room sizes, and amenity space. Residential accommodation should meet the minimum space standards set out in the Department for Communities and Local Government's Technical Housing Standards (2015) and the Gravesham Residential Layout Guidelines (2020). Additionally, developments must ensure adequate storage space, provision for refuse and recycling, facilities for covered cycle parking, and appropriate outdoor space for private or communal use. These elements are essential to ensure that new residential developments provide a high quality of life for occupants.
- 5.33 The proposed development and provision of 13 flats all comply with the Gravesham Residential Layout Guidelines (2020) with all habitable rooms being served by windows for natural lighting.
- 5.34 Furthermore, the minimum floor area, as per the Nationally Described Space Standards (2015) for a one-bedroom dwelling for 1 and 2 people is 39m² and 50m²



respectively. The proposed development would modestly exceed this standard as demonstrated below:

First Floor Rooms	Size (Bedroom/ Person)	Minimum Floor Area (m ²)	Proposed Floor Area (m ²)	Complies (Y/N)
Flat 1	1B1P	39	42.9	YES
Flat 2	1B2P	50	52.4	YES
Flat 3	1B1P	39	42.1	YES
Flat 4	1B2P	50	65	YES
Flat 5	1B1P	39	42.3	YES
Flat 6	1B2P	50	50.7	YES
Flat 7	1B1P	39	47	YES
Flat 8	1B2P	50	52.3	YES
Flat 9	1B1P	39	65.3	YES
Flat 10	1B1P	39	39.5	YES
Flat 11	1B1P	39	42.4	YES
Flat 12	1B1P	39	50	YES
Flat 13	1B1P	39	55.4	YES



5.35 In addition to minimum space standards, the proposed floor plans demonstrate compliance with:

- Furniture, access and activity space requirements relating to declared levels of occupancy;
- Aggregate floor areas for lounge/dining/bedroom areas;
- All bedrooms also comply with the minimum areas;
- The provision of a storage cupboard with a minimum floor area of 1.5m² and 2m² for each studio dwelling respectively;
- Landings and hallways have a minimum width of 900mm;
- All flats comply with minimum floor-to-ceiling heights; and
- All flats comply with environmental comfort standards;

(b) Dwelling Mix

5.36 Policy CS14 of the Gravesham Local Plan (2014) ensures that new housing developments provide a range of dwelling types and sizes based on the local area's character and identified needs. It emphasises the protection of family-sized housing and the provision of homes designed to meet the needs of older and disabled people, as well as the need for specialist housing where required.

5.37 The decision to create 1-bedroom flats at 6-8 Overcliffe has been carefully considered, with the property's location playing a key role in the choice of unit type. Situated near Gravesend's town centre, the Site is highly accessible and well-connected, making it a prime location for smaller households.

5.38 As previously highlighted, 6-8 Overcliffe is located along a busy arterial route, providing direct access into and out of the town centre, which makes it ideal for individuals who work locally or commute. The close proximity to essential amenities, such as shops, restaurants, public services, and transport links, aligns with the housing needs of those who prefer the convenience of living in a central urban location, where car ownership may not be necessary. The town centre environment supports a higher turnover of residents, with a focus on small, manageable living



spaces that can offer both affordability and convenience. This aligns with Policy CS14 which encourages a range of housing types to suit diverse demographics and foster sustainable, balanced communities.

- 5.39 The building itself, being over two storeys and containing more than six habitable rooms, meets the requirements for conversion outlined in Saved Policy H5 of the Gravesham Local Plan First Review (1994), which identifies larger buildings in appropriate locations as suitable for conversion into flats, maisonettes, and other forms of multiple occupancy. In this case, 6-8 Overcliffe is not only well-suited for conversion due to its size and layout but also because it is in an area where similar conversions are common. The surrounding properties, many of which have been converted into flats and maisonettes, reflect the evolving character of the area, supporting the shift towards more compact, affordable residential units.
- 5.40 Additionally, the conversion of this larger building into multiple smaller units helps alleviate the pressure on family-sized housing, which is typically in demand in areas more suited for single-family dwellings. By offering 1-bedroom flats, the development addresses the need for affordable, high-quality housing in a central location without compromising the character of the area.
- 5.41 Overall, the decision to propose 13 1-bedroom flats at 6-8 Overcliffe reflects a thoughtful response to both the location's characteristics and the growing housing needs of smaller households. The Site's proximity to the town centre, coupled with its suitability for conversion, ensures that the development meets the strategic objectives of Policy CS14 of the Gravesham Local Plan (2014) and Saved Policy H5 of the Gravesham Local Plan First Review (1994).

(c) Amenity Space Standards

- 5.42 Policy CS19 of the Gravesham Local Plan (2014) promotes the importance of providing adequate space around and within dwellings to ensure high standards of living. It highlights that the space allocated contributes significantly to the overall quality of housing, well-being of occupants, and the character of the surrounding area. The policy requires that all new developments, including conversions, meet the minimum space standards set out in the Residential Layout Guidelines. This ensures



that both internal and external spaces (including private amenity areas like gardens or balconies) are sufficient for the needs of future occupants.

- 5.43 Given the urban location of the Site at 6-8 Overcliffe, the proposed development of 13 flats benefits from a variety of amenity spaces located at the rear of the building, ensuring that all units have access to suitable outdoor space. This approach balances the density of the development with the need to provide high-quality living environments for future residents.
- 5.44 The lower ground floor flats (units 1, 2, and 9) have each been provided with their own dedicated private garden space, located at the rear of the property. These private amenity areas, in combination with the installation of 1.8m high fencing, act as both defensible space and visual buffers for the habitable rooms facing the communal areas at the rear of the site, including the cycle parking. This setup ensures that the privacy and outlook of the lower ground floor units are preserved, while also providing high-quality outdoor space for the future occupants. Each private garden exceeds 10m², meeting the minimum space standards required by the Gravesham Residential Layout Guidelines (2020), and contributes to the overall quality of accommodation being offered.
- 5.45 The upper-floor flats do not benefit from private amenity spaces; however, they have access to a communal garden, which provides a substantial shared outdoor area measuring 313m². This communal garden includes a combination of grassy areas, paved sections, seating areas, and landscaped features, offering residents a functional and attractive outdoor environment. The communal amenity space has also been designed to meet the requirements of the Gravesham Residential Layout Guidelines (2020) and ensures that all residents have access to outdoor space that promotes well-being and social interaction.
- 5.46 As such, it is considered that the development provides acceptable living standards for future occupiers, and it therefore complies with Policies CS14 and CS19 of the Gravesham Local Plan (2014) and Saved Policy H5 of the Gravesham Local Plan First Review (1994) and the Gravesham Residential Layout Guidelines (2020).



(iv) Impact on Neighbouring Amenity

- 5.47 Policy CS15 of the Gravesham Local Plan (2014) while primarily focused on housing density, also takes into account the need to ensure that higher-density developments do not compromise the amenity of neighbouring properties. It outlines that developments must be designed to avoid overdevelopment, ensuring that there is no adverse effect on the living conditions of neighbouring residents in terms of space, privacy, and overall living environment.
- 5.48 Policy CS19 of the Gravesham Local Plan (2014) emphasises that it ensures that developments are designed in such a way that they do not result in unacceptable impacts on neighbouring properties. This includes aspects like overlooking, overshadowing, and noise. The policy stresses the importance of integrating new developments into their surroundings while respecting the character of the local area, ensuring that the amenity of existing residents is maintained.
- 5.49 The proposed development has been carefully designed to respect the amenity and privacy of neighbouring properties, ensuring that the impact is minimal. The external changes are limited in scope and primarily focused on improving access to the Site rather than altering the structure's overall footprint or massing. This approach preserves the existing form and character of the building, which remains in harmony with the surrounding conservation area that features residential properties.
- 5.50 By maintaining the existing building layout, the development minimises the potential for overshadowing or overlooking neighbouring properties. The proposed alterations do not introduce new windows or external features that would compromise the privacy of adjoining residences. The separation distances between the proposed development and neighbouring properties are consistent with local planning guidelines, ensuring that there will be no adverse impact on sunlight, daylight, or privacy.
- 5.51 Furthermore, the proposed alterations, such as the reconfiguration of access points and the provision of private amenity spaces, are functional rather than aesthetic and do not contribute to a substantial increase in the bulk or height of the building. As a result, the proposal avoids creating any significant visual dominance or sense of



enclosure for adjacent properties, preserving their outlook, and maintaining the overall character of the streetscape.

- 5.52 In terms of noise, light, and other potential disturbances, the development is designed in a way that ensures no material increase in such impacts on neighbouring properties. The residential nature of the development is consistent with the existing uses in the area, and no intensification of activity is anticipated that would disrupt the quiet enjoyment of adjacent properties.
- 5.53 Overall, the proposed development is considered to have a minimal impact on neighbouring occupiers, ensuring no unacceptable effects on their living conditions and as such in compliance with Policies CS15 and CS19 of the Gravesham Local Plan (2014), as well as the overarching principles of the National Planning Policy Framework (2023). The proposal strikes a balance between development and protecting the amenity of neighbouring properties.

(v) Parking and Highways

- 5.54 Policy CS11 of the Gravesham Local Plan (2014) outlines the requirement for new developments to mitigate their impacts on the highway and public transport networks. It emphasises the need for transport assessments and travel plans to ensure that developments promote travel choices and sustainable transport options, such as walking, cycling, and public transport. The policy also supports sufficient parking provisions, which must be aligned with the availability of alternative transport modes and accessibility to services and facilities.
- 5.55 A Transport Statement Note (produced by Directive Planning and Developments Ltd) accompanies the submission documents and will be referenced throughout this section to provide detailed analysis and justification for the transport and parking provisions within the proposed development.
- 5.56 It has been considered that there are no parking or highway issues associated with this proposal. The Site's strategic location near Gravesend Town Centre makes it an exemplary candidate for a car-free development, benefitting from excellent access to a wide range of local amenities and sustainable transport options. Future residents



will enjoy easy access to public transport services, including buses and Gravesend Railway Station, as well as dedicated cycling and walking routes, all of which make private vehicle use less necessary. This supports both local and national policies aimed at reducing car dependency and promoting the shift towards more environmentally sustainable travel modes.

5.57 However, the ample size of the plot at 6-8 Overcliffe provides the flexibility to include off-street parking spaces at the rear of the property. While the development encourages the use of sustainable transport, the inclusion of off-street parking offers residents the choice to use private vehicles if needed. This dual approach—promoting sustainable transport while allowing for car use—ensures the development caters to a wide range of residential preferences and lifestyles, offering both flexibility and convenience.

5.58 The decision to include off-street parking also mitigates potential parking pressures on surrounding streets, particularly in this central location where demand for on-street parking may be higher due to the site's proximity to the town centre. By providing dedicated parking spaces for each flat, the development helps maintain the efficiency of local roads and prevents additional strain on the public parking supply. This approach ensures that the proposal does not negatively impact traffic flow or the availability of parking for nearby residents and businesses.

5.59 The parking provision is broken down as follows:

(a) Car Parking

5.60 The development's layout has been carefully and thoughtfully designed to include off-street parking at the rear of the property, ensuring each flat is allocated a designated parking space. These spaces provide secure, convenient, and practical solutions for residents who own private vehicles, offering the flexibility of private transport while maintaining a commitment to sustainability. By situating the parking at the rear, the visual impact on the streetscape is minimised, preserving the overall aesthetic of the development. The provision of these parking spaces meets the Kent Vehicle Parking Standards (2006) ensuring compliance with local regulations and guidelines. This approach not only caters to residents' vehicle parking needs but also



supports the development's broader goals of promoting sustainable urban living by balancing private vehicle use with sustainable transport options.

(b) Cycle Parking

- 5.61 To further enhance sustainable travel options, the development includes a dedicated, secure cycle storage area to provide 13 cycle spaces located within the communal amenity space at the rear of the property. This cycle storage facility is positioned behind a secured gate, providing access exclusively to residents, which adds an extra layer of security by limiting access. The gate, combined with the location of the cycle parking being away from the front of the property, offers additional protection, ensuring that residents' bicycles are stored in a safe, secure, and discreet area. In line with the Kent Vehicle Parking Standards (2006), the cycle parking is designed to provide a long-term storage solution for residents, encouraging the use of bicycles as a primary or supplementary mode of transport.
- 5.62 Although detailed plans of the cycle storage have not yet been provided, the applicant is happy to secure this by condition should the application be minded for approval. This condition will ensure that the cycle storage meets the necessary standards and is appropriately integrated into the development to align with the sustainability objectives.
- 5.63 In addition to secure resident cycle storage to the rear, the development will also provide visitor cycle stands, promoting the use of bicycles for guests and encouraging more sustainable travel options for all. The location of the cycle parking to the front of the Site allows for easy access while maintaining security and convenience for both residents and visitors. This initiative supports the wider goal of reducing car dependency and fostering the adoption of more sustainable, low-emission travel methods among future occupants and their guests.
- 5.64 For further details regarding the specifics of both the car parking and cycle storage provisions, please refer to the accompanying Transport Statement Note, which outlines the technical aspects of these facilities in compliance with local policies and guidelines. The Transport Statement Note provides an in-depth analysis of how these features contribute to the overall functionality, security, and sustainability of the



proposed development.

(c) Conclusion

- 5.65 The combination of secure off-street parking and well-designed cycle storage aligns with local and national policies that advocate for sustainable transport choices. While the development's proximity to Gravesend Town Centre makes it suitable for car-free living, the inclusion of parking options ensures that residents have the flexibility to choose their preferred mode of transport. This balanced approach encourages sustainability while maintaining practicality for residents. As such, the proposed development complies fully with Policy CS11 of the Gravesham Local Plan (2014) and the Kent Vehicle Parking Standards (2006).

(v) Waste Management

- 5.66 Kent County Council (KCC) provides supplementary guidelines on waste and recycling provision in residential developments with respect to the Waste Management Supplementary Planning Documents ensuring that developments are adequately serviced in terms of waste collection and management to maintain public health and amenity standards.
- 5.67 Waste storage for the development at 6-8 Overcliffe has been carefully planned to ensure both functionality and minimal visual impact. The refuse store for all flats will be located within the front driveway of the property. By situating the bins offset from the front boundary, the development strikes a balance between accessibility and aesthetics. This ensures that the waste storage area is close enough to allow for efficient and convenient access by the waste collection teams but far enough from the boundary to maintain the integrity of the frontage and the Overcliffe Conservation Area.
- 5.68 Although detailed plans of the refuse and recycling storage have not yet been provided, the applicant is happy to secure this by condition should the application be minded for approval to ensure it is in compliance with the local waste management guidelines. The bins will be housed in a secure and covered area, ensuring that waste is safely contained and protected from external factors such as weather or wildlife, while also maintaining hygiene and cleanliness on-site. The covered structure not



only enhances the practicality of the waste storage but also contributes to a more organised and visually appealing frontage.

- 5.69 To further mitigate the visual impact of the waste storage area, the development proposes the use of landscaping on either side of the storage location. The screening provided by landscaping will ensure that the waste bins remain unobtrusive, blending seamlessly with the surrounding environment and enhancing the overall aesthetic quality of the property. This thoughtful approach to landscaping ensures that the waste storage area does not dominate the front of the property or disrupt the architectural harmony of the street scene.
- 5.70 By integrating secure waste storage with aesthetic considerations, the development at 6-8 Overcliffe achieves a solution that ensures practical waste management without detracting from the property's appearance or the wider urban environment and complies with KCC Waste Management Supplementary Planning Documents.

(v) Ecology and Biodiversity

- 5.71 Paragraphs 185 and 186 of the National Planning Policy Framework (2023) stress the importance of safeguarding and enhancing biodiversity in planning decisions.
- 5.72 Policy CS12 of the Gravesham Local Plan (2014) states the importance of creating, protecting, enhancing, and maintaining a linked network of green spaces, footpaths, and wildlife corridors throughout the borough. It highlights the protection of sites designated for their biodiversity value, including internationally designated Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and Ramsar sites. These areas receive the highest level of protection, followed by Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites.
- 5.73 The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally significant for nature conservation, primarily as wetland habitats supporting large numbers of wintering waterbirds and migrating birds. However, recent studies have indicated a decline in bird populations in these areas, which has been partly attributed to increasing recreational activities.
- 5.74 The North Kent Bird Disturbance Report highlights that new housing developments



within 6km of the North Kent Ramsar Sites and Special Protection Areas, including the Thames Estuary and Marshes, may contribute to further declines by increasing recreational pressure. Larger housing developments beyond the 6km boundary may also result in adverse impacts on these important ecological sites.

- 5.75 As the proposed development at 6-8 Overcliffe is located within this 6km zone, it falls within the scope of these environmental concerns. Additional residential units, such as those proposed in this development, could result in increased visits to the protected sites, contributing to further recreational disturbance. To mitigate these impacts and support local conservation efforts, Gravesham Borough Council has adopted the Strategic Access Management and Monitoring Strategy (SAMMS), which outlines measures to protect these vulnerable bird populations.
- 5.76 In line with Policy CS12, the Council has introduced a tariff for new housing developments within 6km of these sensitive sites. The applicant at 6-8 Overcliffe will be required to make a contribution of £253.84 per new dwelling, totalling £3,299.92 for the 13 units proposed. These contributions will be used to fund ecological management and bird conservation projects that mitigate the increased pressures on the Ramsar site and SPA, ensuring that new housing developments do not exacerbate the decline in bird populations.
- 5.77 The applicant has indicated their willingness to comply with this requirement and is prepared to complete the SAMMS Mitigation Contribution Agreement. This commitment ensures that the development aligns with the Habitat Regulations and Paragraphs 180 and 181 of the National Planning Policy Framework (NPPF, 2021),
- 5.78 Therefore, while the development is within a sensitive ecological zone, the applicant's contribution to the SAMMS Mitigation Strategy ensures compliance with the Habitat Regulations, minimises adverse impacts on the Thames Estuary and Marshes Ramsar site, and supports Gravesham's broader biodiversity and conservation efforts in line with Policy CS12 of the Gravesham Local Plan (2014) and the National Planning Policy Framework (2023).



6.0 CONCLUSION

- 6.1 In conclusion, Directive Planning and Developments Ltd, on behalf of Tower Group Developments Ltd, has prepared this Planning Statement to support the proposed demolition of the Class E storage building and conversion of the existing office building at 6-8 Overcliffe, Gravesend, into 13 one-bedroom self-contained flats.
- 6.2 The proposal addresses Gravesham Borough Council's need for housing by offering 13 high-quality residential units in a sustainable urban location. The development has been designed with sensitivity to its context within the Overcliffe Conservation Area, ensuring that the proposed alterations respect the area's historical character while enhancing the property's functionality for residential use.
- 6.3 The design incorporates minimal external alterations, focusing on replacing windows to reflect the period architecture of the conservation area and improving the site's overall aesthetic through landscaping and boundary treatments. Provisions for parking, cycling, and waste management have been carefully planned to meet local standards and support the sustainability of the development, with off-street parking, secure cycle storage, and refuse areas located to minimise their impact on the streetscape.
- 6.4 In terms of ecological considerations, the applicant is committed to mitigating any adverse effects on nearby designated sites, particularly the Thames Estuary and Marshes Ramsar and Special Protection Area (SPA), by contributing to the Strategic Access Management and Monitoring (SAMMS) measures.
- 6.5 The development provides an exemplary model of urban regeneration, making efficient use of previously developed land while contributing to Gravesham's housing supply. It aligns with national and local planning policies, encouraging sustainable development and transport, high-quality design, and protection of heritage assets.

It is respectfully requested that Gravesham Borough Council grants full planning permission for the proposed development, given its adherence to planning policies and its contribution to the local housing need, urban regeneration, and sustainable transport initiatives.



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