CGI taken from New Road (Stolon Studio)

Combined Planning Statement - Prior Approval Class MA (Conversion) & Full Planning (external alterations to building)

Former Debenhams Store, New Road, Gravesend

Prepared for: GBD PROPS LTD
Prepared by: Agility Planning and Design
22 June 2026
Proposal number: APD-00605

INTRODUCTION

Overview

Agility Planning and Design have been appointed by GBD PROPS LTD (The Applicant) to prepare and submit this Prior Approval Application for the change of use from offices (Use Class E) to residential dwellings (Use Class C3). Application is made under Class MA of The Town and Country Planning (General Permitted Development) (England) Order 2015 at the former Debenhams Store and Barclays Bank, New Road, Gravesend (Figure 1: Site location).

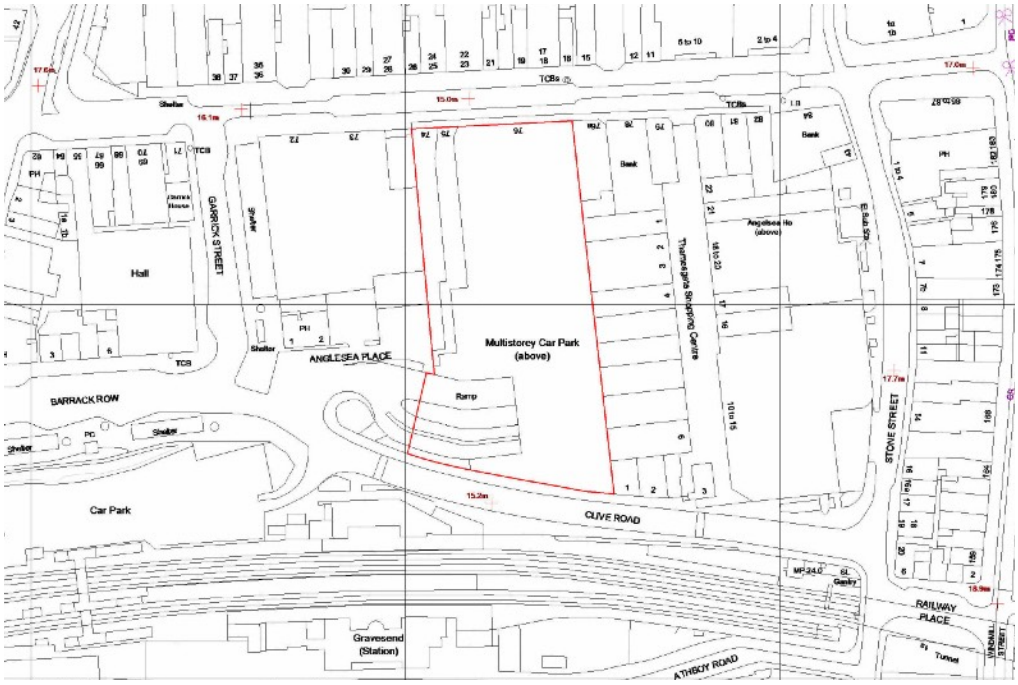

Figure 1: Site location (Stolon Studio)

As the conversion involves external alterations, including but not limited to replacement windows, the installation of entrances and alterations to the façade, a full planning application has been submitted to run concurrently with the Prior Approval application. Both applications have been submitted to Gravesham Council.

Pre-application Consultation

In November 2025, the Applicant undertook pre-application consultation with the Council, setting out a vision to transform the vacant building into a high-quality residential conversion above the commercial ground floor. Feedback from the Council was supportive, as the proposal would align with the overall vision and strategy to regenerate Gravesend town centre.

The pre-applicant proposed additional storeys above the existing building, which would have been addressed through a full planning application. Due to economic constraints and market conditions, the additional storeys

will not be brought forward in the near future, although they are not ruled out. Furthermore, the proposals submitted herewith would not prejudice any potential future application for additional storey(s), as the design would allow for access to the roof space and services.

Combined Statement

This Combined Planning Statement supports both the Prior Approval application and full planning application for external alterations. Both applications are submitted to Gravesham Council.
The Statement is structured as follows:

- Site and Surrounds
- Relevant Planning History
- Council's Vision and Masterplan
- Prior Approval Class MA
- Full Planning External Changes
- Conclusion

SITE AND SURROUNDS

The Site

The site is located between New Road to the north and Clive Road to the south. As mentioned above, the site was once the Debenhams Store and also Barclays Bank (Figure 1). The building footprint is 100 metres (approx) in length and 42 metres in depth.

The building is early 1970s with two storey at the front (New Road elevation) with additional mansard roof; and, a fourth storey to the rear (Clive Road elevation). Figures 2 - 3 shows the site from front and rear elevations.

Figure 2: View from New Road

Figure 3: View from Clive Road

Surrounds

As mentioned above, the site is situated within Gravesend town centre which is a highly sustainable location. As demonstrated in Figure 4, the site is within easy walking distance from buses and the railway station. Additionally, the benefits enjoyed of town centre locations include access to employment opportunities, retail, cafes, restaurants, bars, pubs and retail.

Figure 4: The Site and transport and context

The site is within the Primary Shopping Area (PSA) with ground-floor retail frontage and New Road is a pedestrian zone which enhances the retail experience and makes for a pleasant walk along the road (Figure 5).

Figure 5: New Road with site in background on left

The site is located between Tesco and Thamesgate Shopping Centre, with the Thamesgate Shopping Centre car park situated above the rear portion of the ground floor (Figure 6).

Figure 6: Clive Road entrance to Thamesgate Shopping Centre

The site is not within a conservation area. However, as illustrated further below (Figure 7), there are three listed buildings further south of the site:

A. The Railway. Bell Public House, Grade II Listed - list entry no: 1089042
B. Gravesend Railway Station (Downside), Grade II Listed - list entry no: 1341495
C. Gravesend Railway Station (Upside), Grade II Listed - list entry no: 1057649

Heritage is discussed in detail under Full Planning External Changes section of this statement.

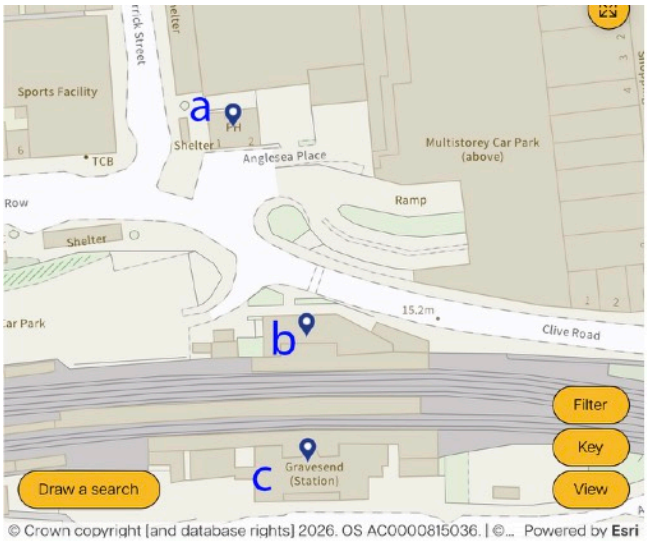

Figure 7: Listed buildings and proximity to the site

Finally, according to the Environment Agency's website for flood mapping and planning, the site is within Flood Zone 1 (low probability of flooding).

RELEVANT PLANNING HISTORY

The site

Information provided courtesy of the Council, records dating back circa. 1969.

- LPA ref: TM/2/69/193 (05.03.70) - shopping development.
- LPA ref: TM/2/69/193A (16.07.70) - shopping development.
- LPA ref: TM/2/69/193B (12.10.72) - details of shopping, multi-storey car park and offices.
- LPA ref: TM/2/69/193C (15.03.73) - erection of shops with storage and service facilities and multi-storey carpark and offices.

Other relevant applications nearby

1. LPA ref: 20200343 - Erection of 242no. residential units for Build to Rent (C3 Use Class), within three blocks ranging from 3 to 10 storeys, together with multi-storey car park as well as access, pedestrian links, landscaping, highway and other associated works. Address: Land At Market Square And Horn Yard Car Parks, New Swan Yard.
2. LPA ref: 20190304 - Subdivision of the existing retail units at ground floor to provide 7 A1 retail units, 2 A1 retail kiosks and new pedestrian links together with the conversion of the first and second floor and additional storey to provide 1 B1(a) office and 35 no. residential units, associated amenity, landscaping, parking, waste, cycle storage. Address: 1 - 2 King Street & 34 & 35, High Street.
3. LPA ref: 20220953 - Subdivision of the existing residential unit that is located across the 1st - 3rd floors of the property into 6 residential studio flats. Address: 22 - 25 New Road.
4. LPA ref: 20210453 - Repair, restoration, extension and repurposing of 11-12 King Street to provide a residents' workhub at ground floor level and 6 flats above along with the construction of a new part 6, part 7 storey building to the rear to contain 42 flats creating 48 flats in total together with car and cycle parking, refuse and recycling storage and private and communal amenity spaces. Address: 11-12 King Street.

Summary

Various applications indicate that the site and immediate area were developed in the early 1970s as a purpose-built shopping centre with parking and offices.

Relevant nearby examples of residential flats and mixed use developments in the town centre which supports the overall regeneration and vision, summarised further below.

COUNCIL'S VISION AND MASTERPLAN

Council's Vision

The Applicant has acquired the former Debenhams Store located at New Road, Gravesend which is part of the independent shopping offer within the core retail centre.

As set out in the Gravesham 2040 the '*town was a thriving local retail centre at the end of the 20th century but today the town centre faces familiar challenges and needs to diversity to offer more for the community and visitors to the town.*

This includes a rich mix of opportunities; from a retail offer on New Road, to an independent offer of small businesses and artisans along the historic High Street, a vibrant riverside shifting the town back to the Thames, cultural destinations, from a Theatre, art centres, to community pop-ups and LV21 to brownfield regeneration sites that deliver housing and employment, stimulating footfall and economic investment in the town.'

The Gravesend Feasibility Study Stage 2 Report (March 2025) builds on the recommendations of the initial study with a focus on three priority areas: Station North Entrance, Riverside Street Link, and Gate to Gate.

The site is part of the Gate to Gate and the report draws out key opportunities to enhance the quality, identity, and functionality of its public spaces (Figure 8 showing artists impression of the vision).

Figure 8: Gravesend Town Centre Feasibility Study Appendix 1 RIBA Stage 2 Report (source: Gravesend Borough Council)

Masterplan for the Site

The initial Masterplan for the site supports the Council's wider regeneration objectives by re-introducing viable commercial uses at ground-floor level, with residential accommodation above. The proposals would also deliver physical enhancements along Clive Road, a key route within the town centre for those arriving from the railway station and moving towards the centre. Computer-generated images (CGIs) at Figures 9–10 demonstrate the high-quality development proposed.

Figure 9: CGI taken from New Road (Stolon Studio)

Figure 10: CGI taken from Clive Road (Stolon Studio)

PRIOR APPROVAL CLASS MA

Introduction

This section of the Statement addresses the Prior Approval application for the proposed conversion to provide 33 residential units pursuant to Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.

It is demonstrated below that the proposal satisfies the relevant eligibility criteria, that the required assessment matters have been addressed, and that the necessary supporting plans and information have been submitted. Accordingly, Prior Approval should be granted within the statutory 56-day determination period.

External alterations associated with the development are addressed separately under the full planning application section dealing with external changes.

Eligibility Criteria

A schedule of drawings has been submitted to assist the Local Planning Authority in its assessment of the application.

Commercial Use History

Until recently, the site was occupied by Debenhams and Barclays Bank, operating as a large department store and associated offices within the town centre's primary shopping area.

Exclusion Checks

The building is not listed, is not a scheduled monument, and is not located within a safety hazard area or a military explosives storage area. The Council has also not introduced an Article 4 Direction that would remove Class MA permitted development rights from the site.

Prior Approval Assessment Matters

Transport and Highways Impact

As set out in the Site and Surrounds section, the site occupies a highly sustainable town centre location, which supports the principle of a car-free residential development. Gravesend is a compact and walkable town with a well-connected street network, good quality pedestrian infrastructure, and close proximity to key services and facilities, including retail, healthcare, education and leisure uses.

Gravesend Railway Station is located within a few minutes' walk of the site and provides connections to London St Pancras, Ebbsfleet International, the Medway towns, the Kent coast and wider London stations.

The site is also served by a comprehensive local bus network connecting Gravesend with surrounding neighbourhoods and destinations, including Bluewater, Dartford, Northfleet and Ebbsfleet Garden City. Safe and secure cycle storage would be provided in association with the proposed Clive Road and New Road entrances. The proposed entrances would further enhance pedestrian accessibility and contribute positively to the public realm by creating active frontages.

Contamination Risks

The site's historical use as retail and offices does not give rise to any potential contamination hazards to human health.

Flood Risk

The building is located within Flood Zone 1, which is identified as having a low probability of flooding.

Commercial Noise Impacts

It is recognised that town centre living may be associated with a degree of activity from nearby pubs, bars and restaurants. However, the proposed flats would be located above ground-floor level, and upgraded glazing would provide an appropriate level of insulation from external noise.

Adequate Natural Light

As demonstrated by the submitted drawings, all habitable rooms, including bedrooms and living areas, would receive adequate natural light.

Fire Safety

This matter is not applicable, as the existing building is below 18 metres in height.

Living Conditions

All 33 proposed flats would comply with the Nationally Described Space Standard (NDSS). The tables below set out the proposed internal floor areas and the relevant bedspace and occupancy standards.

- 11 residential units on first floor (New Road):

Unit	Block	Area (sqm)	Bed / person
1	Front	85	Flat 2B/3P
2	Front	58	Flat 1B/2P
3	Front	58	Flat 1B/2P
4	Front	56	Flat 1B/2P
5	Front	54	Flat 1B/2P
6	Front	70	Flat 2B/3P
7	Front	40	Flat 1B/1P
8	Front	53	Flat 1B/2P
9	Front	78	Flat 2B/3P
10	Front	75	Flat 1B/2P
11	Front	95	Flat 2B/4P

- 7 residential units on first floor (Clive Road):

Unit	Block	Area (sqm)	Bed / person
12	Rear	85	Flat 2B/4P
13	Rear	57	Flat 1B/2P
14	Rear	53	Flat 1B/2P
15	Rear	58	Flat 1B/2P
16	Rear	60	Flat 1B/2P
17	Rear	50	Flat 1B/2P
18	Rear	70	Flat 2B/4P

- 7 residential units on second floor (Clive Road):

Unit	Block	Area (sqm)	Bed / person
19	Rear	106	Flat 2B/4P
20	Rear	57	Flat 1B/2P
21	Rear	58	Flat 1B/2P
22	Rear	53	Flat 1B/2P
23	Rear	60	Flat 1B/2P
24	Rear	50	Flat 1B/2P
25	Rear	70	Flat 2B/4P

- 8 residential units on third floor (Clive Road):

Unit	Block	Area (sqm)	Bed / person
26	Rear	52	Flat 1B/2P
27	Rear	51	Flat 1B/2P
28	Rear	41	Flat 1B/1P
29	Rear	62	Flat 1B/2P
30	Rear	101	Flat 2B/4P
31	Rear	59	Flat 1B/2P
32	Rear	50	Flat 1B/2P
33	Rear	70	Flat 2B/4P

Mandatory Accompanying Documents

The Prior Approval application is accompanied with following plans:

Drawing	Drawing title	Number	Revision
Existing			
	Location Plan	067-SSA-S3-XX-DR-A000	B
	Block Plan	067-SSA-S3-XX-DR-A001	B
	Existing Basement Plan	067-SSA-S3-EX.B1-DR-A100	B
	Existing Ground Floor Plan	067-SSA-S3-EX.00-DR-A101	B
	Existing Ground Floor Plan	067-SSA-S3-EX.00-DR-A101.1	A
	Existing First Floor Plan	067-SSA-S3-EX.01-DR-A102	B
	Existing Second Floor Plan	067-SSA-S3-EX.02-DR-A103	B

Drawing	Drawing title	Number	Revision
	Existing Third Floor Plan	067-SSA-S3-EX.03-DR-A104	B
	Existing Roof Plan	067-SSA-S3-EX.04-DR-A105	B
	Existing Elevations - Front Block	067-SSA-S3-EX.XX-DR-A300	B
	Existing Elevations - Rear	067-SSA-S3-EX.XX-DR-A301	B
	Existing Elevations - Rear Block	067-SSA-S3-EX.XX-DR-A302	B
Proposed			
	Plan, proposed grd flr (Front)	067-SSA-S3-00-DR-A100	D
	Plan, proposed grd flr (Rear)	067-SSA-S3-00-DR-A100.1	D
	Plan, proposed 1st flr	067-SSA-S3-01-DR-A101	E
	Plan, proposed 2nd flr	067-SSA-S3-02-DR-A102	E
	Plan, proposed 3rd flr	067-SSA-S3-03-DR-A103	E
	Plan, proposed 4th flr (Roof)	067-SSA-S3-04-DR-A104	D
	Area Plans	067-SSA-S3-ZZ-DR-A015	E
	Proposed Sections	067-SSA-S3-ZZ-DR-A200	D
	Proposed Bin Store Section	067-SSA-S3-ZZ-DR-A202	A
	Proposed Elevations - Front Block	067-SSA-S3-XX-DR-A300	C
	Proposed Elevations - Rear Block	067-SSA-S3-XX-DR-A301	C
	Proposed Elevations - Flat Roof	067-SSA-S3-XX-DR-A302	B
	New Road Visualisation	067-SSA-S3-XX-VS-A900	B
	Clive Road Entrance Visualisation	067-SSA-S3-XX-VS-A901	B
	Clive Road Entrance Visualisation	067-SSA-S3-XX-VS-A902	A
	Clive Road Entrance Visualisation	067-SSA-S3-XX-VS-A903	A

To assist the Council in its assessment, this Statement is submitted alongside the Design and Access Statement prepared by Stolon Studio in support of the Prior Approval application for the change of use and the full planning application for external alterations. Computer-generated images have also been provided for illustrative purposes only.

Conclusion

The plans submitted for the proposed 33 flats demonstrate compliance with the requirements of Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. As set out above, the external alterations require full planning permission and are addressed in the following section.

FULL PLANNING EXTERNAL CHANGES

Introduction

Full planning permission is required for the proposed external alterations. As shown on the submitted plans, the proposed design and materials would significantly improve the overall appearance of the building and its immediate context.

This section assesses the proposed external alterations against the relevant national and local planning policies. It is noted that the Design and Access Statement (DAS) provides detailed information on the proposed external appearance.

Policy

Local planning policy

The Development Plan for Gravesham currently consists of:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) – saved Policies
- Kent County Council Minerals and Waste Local Plan 2024-30 (adopted March 2025)

The policies most relevant to design and appearance are set out further below:

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage & the Historic Environment

Other relevant guidance is contained within the Supplementary Planning Guidance titled Design for Gravesham – Design Code (2024).

National planning policy

National Planning Policy Framework (NPPF) (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 16 – Conserving and Enhancing the Historic Environment

Considerations

External - walls

As set out below, the proposed mix of materials, colours and textures would deliver a high-quality design response and would therefore comply with Policies CS01 and CS19 of the Core Strategy, together with paragraph 135 of the NPPF in relation to design.

The DAS provides detailed design information, which is summarised below.

The existing building is characterised by a mixture of brick and concrete elements that have been altered over time, resulting in a fragmented appearance with variations in brick colour, weathering and areas of stained concrete. The current palette lacks a cohesive architectural identity and contributes to the building's visually inconsistent appearance within the street scene.

Therefore, the design approach seeks to retain and enhance the existing structure wherever possible, minimising unnecessary demolition and intervention whilst improving the overall quality and coherence of the building's external appearance.

The proposed material palette is simple, durable and cost-effective. New infill elements will be clad in fibre cement panels in complementary pink and patinated copper-green tones, providing a clear distinction between old and new while creating a cohesive architectural identity. Existing brickwork and concrete surfaces will be painted to match the boarding, unify the building's appearance and conceal inconsistencies in the retained fabric.

As illustrated in Figure 11, the proposed mix of materials, colours and textures would deliver a high-quality design response and would comply with Policies CS01 and CS19, together with paragraph 135 of the NPPF in relation to design.

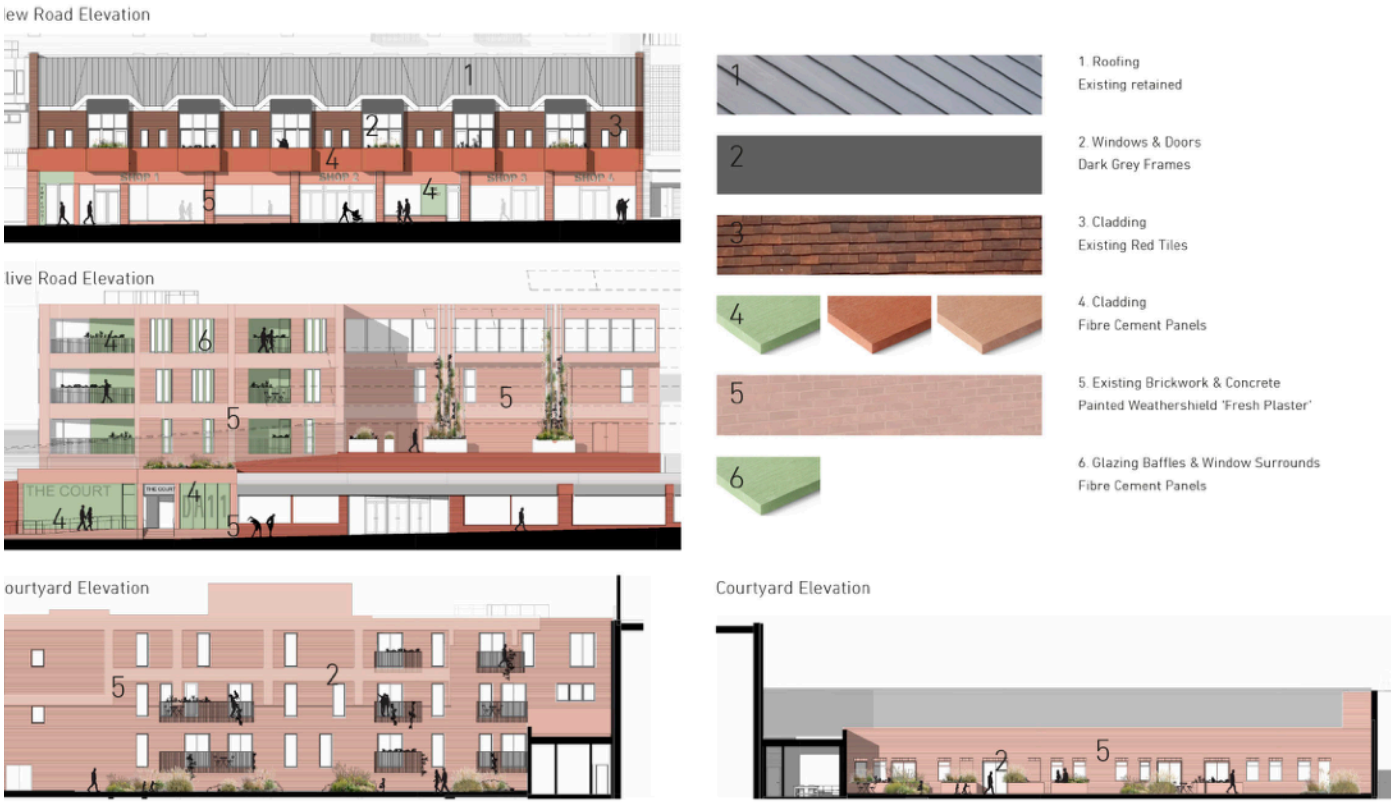

Figure 11: Transformation of facade

External - windows

The proposed window enhancements comprise three main elements: balconies on the New Road façade, courtyard windows, and glazing baffles, as illustrated in Figure 12. Each element is considered in turn below:

- The design would integrate new balconies within the retained facade. This would create a more coherent architectural expression.
- Courtyard windows are designed with retained brick walls using fibre cement surrounds and copings to create a crisp and durable finish. This provides a distinction between existing and new elements.
- The glazing baffles would be integrated within new window openings formed in the existing brickwork. But the baffles provide depth and articulation to the facade while helping to frame views and introduce subtle solar shading.

External - entrances

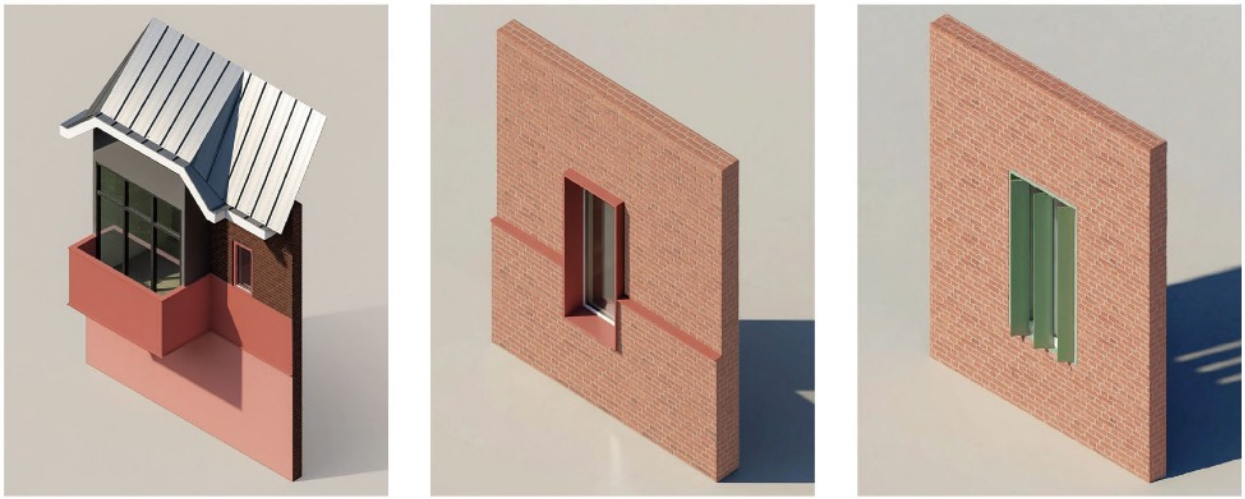

Figure 12: Openings: balconies, courtyard and baffle window systems

Enhanced signage and clearly defined entrances would improve legibility and wayfinding, helping to establish a strong and contemporary identity for the building while remaining sympathetic to its context. The principal frontage has been designed to act as a gateway to the development, clearly signalling arrival, promoting activity and creating a welcoming presence along New Road (Figure 13), thereby strengthening the overall sense of place.

Figure 13: CGI taken from New Road (Stolon Studio)

Along New Road, the proposal includes consistent fibre cement backing panels with polished stainless steel lettering for each shop, creating a coherent façade. The residential entrances would be identified in a contrasting green finish, consistent with the design language of the entrance on Clive Road (Figure 14).

Figure 14: CGI taken from Clive Road (Stolon Studio)

Heritage - listed buildings

As set out in the Site and SurroundS section, there are three listed buildings to the south of the site. Although, these assets are located within approximately 60 metres of the site, two form part of Gravesend Railway Station, while the third is a small public house whose setting is substantially drowned by the unsympathetic 1970s shopping centre development.

The Railway Bell Public House is located to the south-west of the site. Its setting and available views are already affected by the existing 1970s shopping centre and multi-storey car park. The listing entry describes the Railway Bell Public House as: '*Mid C19. 2 storeys weatherboarded. Hipped slate roof, 3 sashes set in moulded architraves with verticals only. The ground floor has 2 doorcases with cornices and brackets and left side contemporary bar front.*'

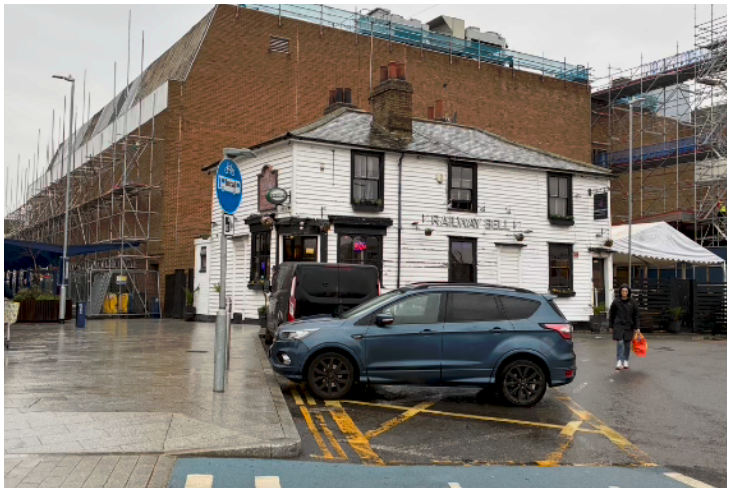

Figure 15: The Railway Bell Public House

The second listed building is part of Gravesend Railway Station, named as the upside railway station built in 1849. The listing entry states '*This consists of a central portion of 1 storey stock brick with a cornice and colonnade of 4 columns, now boxed in and 3-light sashes behind. This portion has a room with a 3-light bow window looking on to the platform. The central block is flanked by 2 2-storey stock brick pavilions with stuccoed cornices. 1 sash to each and a 3-light sash window on the ground floor, on the left hand side incorporating a door. Each of these pavilions is in turn flanked by a recessed portion of 2 storeys stock brick with 1 sash and a round-headed doorcase with fanlight.*'

The third listed building also forms part Gravesend Railway Station (Figure 16) but named as the Downside. Build mid 19th century single storey stock brick. '*Hipped slate roof and cornice. 5 sashes with glazing bars intact. To the left is an extension of 1 storey with a colonnade of 4 cast iron columns and 2 further sashes.'*

The proposed works are unlikely to result in harm to the setting of the heritage assets. Although, there are limited views of the site in context to the heritage assets, however, it is regarded that the proposal would be a positive attribute to setting and would not result in perceived harm.

Figure 16: Gravesham Railway Station

Conclusion

The proposed design is considered to be of high quality and would result in a significant enhancement to the building and its immediate context. The proposal is therefore considered to comply with the relevant development plan policies and the NPPF.

CONCLUSION

This Statement has been prepared in support of the Prior Approval application submitted pursuant to Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, for the proposed change of use of the former Debenhams store and Barclays Bank, New Road, Gravesend. The associated external alterations are addressed separately through the accompanying full planning application.

The site occupies a highly sustainable town centre location, with excellent access to local services, facilities and public transport connections.

Pre-application discussions were undertaken with the Council in November 2025. The initial Masterplan, which seeks to bring the vacant building back into viable use and deliver meaningful improvements to its appearance, was supported in principle by the Council.

The proposal would support the regeneration of Gravesend town centre by delivering much-needed housing, reactivating a prominent vacant building, and contributing positively to the vitality and viability of the area. It would also accord with the Council's wider vision for the town centre and support the principles of sustainable development.

The proposed external alterations would result in a significant enhancement to the existing building and its immediate context. The works would not cause harm to the setting of nearby listed buildings and would instead make a positive contribution to the wider townscape and the setting of heritage assets.

For the reasons set out in this Statement, the proposal is considered to comply with the relevant planning policy framework. Accordingly, Prior Approval and planning permission should be granted without delay.