



Gravesham Borough Council
Planning Department
Submitted via the Planning Portal.

Our ref: RT/AN/37644

21 May 2026

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION FOR A MINOR MATERIAL AMENDMENT TO PLANNING PERMISSION 20240013

FORMER ST JOSEPHS CONVENT PREPARATORY SCHOOL AT 46 OLD ROAD

I write on behalf of the applicant, Galliard (Gravesend) Ltd, to seek a S73 ('Minor Material Amendment') application to amend planning permission ref:20240013 at the above site.

Permission was granted for the conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping, which was permitted by Gravesham Borough Council on the 21st of November 2025.

Section 73 of the Town and Country Planning Act 1990 relates to the variation or removal of conditions attached to an approved planning permission.

Planning History

Original Planning Permission - Ref: 20240013

Planning permission was permitted on the 21st of November 2025 for:

"Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping."

Non-Material Amendment (NMA)- Ref: 20260197

Following the approval of Ref: 20240013, an NMA was permitted on the 24th of March 2026:

Kent

01622 776226

Gatwick

01293 221320

London

020 3005 9725

Leeds

0113 323 6669

DHA Planning Ltd. Registered in England Registered Number: 2683290

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"Application for a non-material amendment to planning permission reference number 20240013 to allow changes to condition 19 to read If construction of the Medical Centre has not commenced prior to the first residential occupation, the NHS contribution (£46,656) will become payable."

A number of conditions have also been submitted in accordance with the above permissions. The applications are currently pending approval; these include:

- Condition 3- CEMP (partial discharge)
- Condition 6- Archaeology (partial discharge)
- Condition 11- Invasive Plants
- Condition 12- Landscape and Ecological Management Plan
- Condition 16- Biodiversity Improvement and Enhancement

Conditions to be Amended

Condition 2- Approved Plans

This application seeks to amend Condition 2 of the approved planning permission ref:20240013. For completeness, the list of drawings and documents to be superseded are listed in the table below.

Approved Plan	Amended Plan
Design and Access Statement Rev. 1	Design and Access Statement Rev.2
Drawing no. 040 - Rev. P4 - Proposed Site Plan Ground Floor	Drawing no. 040 - Rev. P5 - Proposed Site Plan Ground Floor
Drawing no. 041 - Rev. P5 - Proposed Roof Plan	Drawing no. 041 - Rev. P6 - Proposed Roof Plan
Drawing no. 042 - Rev. P4 - Proposed Site Plan - Landscape	Drawing no. 042 - Rev. P5 - Proposed Site Plan - Landscape
Drawing no. 043 - Rev. P4 - Proposed Site Plan - Density	Drawing no. 043 - Rev. P5 - Proposed Site Plan - Density
Drawing no. 044 - Rev. P4 - Proposed Site Plan - Boundaries	Drawing no. 044 - Rev. P5 - Proposed Site Plan - Boundaries
Drawing no. 050 - Rev. P3 - Proposed Site Section AA	Drawing no. 050 - Rev. P4 - Proposed Site Section AA
Drawing no. 051 - Rev. P3 - Proposed Site Section BB & CC	Drawing no. 051 - Rev. P4 - Proposed Site Section BB & CC
Drawing no. 052 - Rev. P3 - Proposed Site Section DD	Drawing no. 052 - Rev. P4 - Proposed Site Section DD
Drawing no. 053 - Rev. P3 - Proposed Site Section EE	Drawing no. 053 - Rev. P4 - Proposed Site Section EE
Drawing no. 054 - Rev. P3 - Proposed Site Section FF	Drawing no. 054 - Rev. P4 - Proposed Site Section FF
Drawing no. 080 - Rev. P1 - House Type A - Level	Drawing no. 080 - Rev. P2 - House Type A - Level
Drawing no. 081 - Rev. P2 - House Type A - Stepped	Drawing no. 081 - Rev. P3 - House Type A - Stepped
Drawing no. 082 - Rev. P2 - House Type B & C	Drawing no. 082 - Rev. P3 - House Type B & C
Drawing no. 083 - Rev. P1 - House Type D	Drawing no. 083 - Rev. P3 - House Type D
Drawing no. 084 - Rev. P2 - House Type E	Drawing no. 084 - Rev. P3 - House Type E

Table 1: Approved and Proposed Plans

The following sections explain the purpose of these amendments and how the proposed scheme continues to comply with the necessary policy requirements.

Reduction in Gross Internal Area of Proposed Housing Units

This application seeks to secure amendments to the proposed size of the housing units. No amendments are proposed to the new build flats or the converted Victorian building flats. The proposed amendments to the approved scheme have arisen following the detailed design stage. This review identified that a number of approved dwellings far exceed their required size and resulted in challenging angles and roof structures in a number of the dwellings, which presents challenges in terms of efficient construction.

The proposal has been rationalised to deliver a more practical and deliverable development, whilst not increasing the number of units on site. This has resulted in the new proposal providing additional rear garden access to the terraces on the western boundary and the northeastern boundary and has allowed number of units to be moved further from the site boundary in the southwestern corner and the eastern boundary.

As a result of these changes, amendments are proposed to a number of the dwellings and approved house-types, which is set out Tables 2 and 3 below, however does not result in an increase to the overall floorspace, but rather will deliver an overall reduction in Gross Internal Area (GIA) of approximately 165 sqm.

Table 2 below demonstrates the Schedule of Accommodation (SoA) for the approved scheme and Table 3, the SoA for the proposed amended scheme.

HOUSE TYPE	NUMBER OF UNITS	BED NUMBER	GIA (M ²)
A-Level	17	2B4P Terrace	96
A-Stepped	16	2B4P Terrace	96
C	1	2B4P Detached	111
D(1)	1	2B4P Terrace	97.2
D(2)	1	2B3P Terrace	86
B	4	3B5P Detached	140
E	1	3B5P Detached	136.4

Table 2: Approved SoA

HOUSE TYPE	NUMBER OF UNITS	BED NUMBER	GIA (M ²)
A	18	2B4P Terrace	87.4
D	1	2B4P Terrace	82.4
C	17	3B5P Terrace	95.8
E	1	3B6P Detached	136.4
B	4	4B7P Detached	116+20 (garage)

Table 3: Proposed SoA

The amended scheme will now incorporate 4-bedroom houses, additional 3-bed houses and reduced number of 2-bed units. As addressed previously, the total number of housing units are to remain the same.

Policy CS14 (from the Local Plan Core Strategy) seeks to ensure that new housing development provides a range of dwelling types and sizes. This proposed scheme will deliver a wider range than was previously approved and therefore continues to meet the policy requirement and offer an improvement.

Internal Space Standards

In terms of the Nationally Described Space Standards (NDSS), the approved scheme far exceeded these requirements, therefore in order to ensure the scheme remains deliverable and buildable, dwelling sizes have been reduced, however still comfortably meet the NDSS requirements. This is detailed in the table below.

HOUSING TYPE (BED NUMBER)	GIA (M ²)	NATIONAL SPACE STANDARD (M ²)
2B4P Terrace	87.4	79
2B4P Terrace	82.4	79
3B5P Terrace	95.8	93
3B6P Detached	136.4	102
4B7P Detached	116+20 (garage)	115

Table 4: Proposed Development against National Space Standards

Parking Standards

It is noted as a number of the house types are changing, parking should be considered in line with Kent County Council's adopted Parking Standards (2025) which has superseded Gravesham's Supplementary Planning Guidance 4 (2006). The level of parking on site is not proposing to change.

The proposed development is within a sustainable location, as it is 1.6km from the Town Centre and 1.4km from Gravesend Train Station, providing connections to London and wider locations in Kent, as acknowledged by the Council in the Committee Report for the previous decision. For the purposes of the adopted parking standards, the site remains to assessed against the 'edge of centre' standards, as per the previous application.

The current approved level of parking is 46 spaces for residents and 11 spaces for visitors. The parking standards currently recommend 1 parking space per unit for 2 and 3 bed houses on the edge of the town centre. The standards also require 2 spaces per unit for 4+ bed houses. The 46 spaces will remain and are within the required standards, with an additional space in excess. This is detailed in the table below.

2006 STANDARDS	(APPROVED SCHEME)	2025 PARKING STANDARDS	SUGGESTED PROVISION (PROPOSED SCHEME)
1 space per 2-bedrooms	36	1 space per 2-bedrooms	19
2 space per 3-bedrooms	10	1 space per 3-bedrooms	18
4-bedrooms N/A permitted scheme	-	2 spaces per 4-bedrooms	8
TOTAL	46		45

Table 5: Parking Standards and Suggested Provision



The amended development therefore continues to apply with the relevant, current parking standards.

Summary and Conclusion

As set out above, the proposed amendments do not result in a material change to the scheme as approved, in accordance with the Town and Country Planning Act, these amendments can be dealt with via a S73 Minor Material Amendment application.

The applicant is committed to progressing the scheme to the next stage and is keen to commence the development to deliver against the Borough's housing need. The proposed amendments will ensure the development remains deliverable and buildable, whilst continuing to comply with the applicable development plan policies.

I trust you have sufficient information to consider this application and validate the submission of information I look forward to receiving acknowledgement of its receipt in due course. If, however, you require additional information please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'R. Crayford', is positioned above a horizontal line.

Rebecca Crayford MRTPI
Associate
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Enc.