

8 week date	Application No.	Date of meeting	Report No.
17/9/2009 14/8/2009	GR/09/0487 GR/09/0488	27 May 2009	

Siri Guru Nanak Darbar Gurdwara, Clarence Place, Gravesend, Kent, DA12 1LD

**GR/09/0487**

Demolition of existing building and erection of two, four storey linked buildings with undercroft parking and vehicular access on to William Street, to provide a total of 19 self contained flats, comprising 16 two bedroom and three, one bedroom flats and erection of two, two storey three bedroom dwellings at the rear fronting William Street.

**GR/09/0488**

Application for Conservation Area Consent for the demolition of the building.

**Applicant: Thamesview Living**

**Recommendation:**

**Defer GR/09/0487 and GR/09/0488 back to Service Manager, Development Control for further negotiations.**

**1. Site Description**

The application site is located on the north side of Clarence Place which is currently used as a Sikh Temple and was the former Milton Congregational Church and is a landmark building within the Windmill Hill Conservation Area. The site has a frontage of some 28 metres and a depth of 32 metres on the west side and a depth of 37 metres on the east side.

The building presents a well mannered façade towards Clarence Place in gothic revival style, displaying features in the design and overall composition that makes it identifiable as an early work of the architect Sir John Sulman. Since its original construction in the 19<sup>th</sup> century the building has undergone a series of changes which have compromised the building to a degree. These changes include rendering of the front of the building and a some unsympathetic extensions to the side and rear.

Topography of the site is one in which the site slopes on a steep gradient from Clarence Place down to the level of William Street to the north.

**2. Historical Background and Planning History**

The Sikh Temple, the former Milton Congregational Church, is a landmark building within the Conservation Area in views along Clarence Place and in views from Windmill Hill towards the river Thames. It is a large bulky building built to house 750

people and designed with 'special consideration to the wants of Congregational worship, particularly so that the entire congregation could see and hear the minister'. The building was laid out in a way that two-thirds of the congregation were seated within 35 feet of the minister.

Sulman (1849 – 1934), born in Greenwich, began his career as a professional architect in partnership with John W. Rhodes and gained recognition as a designer, mainly of Congregational churches. At the age of 35, after having built 70 or so churches, he moved to Australia where he rose to become a distinguished architect, designer and town planner who played an outstanding and influential role in the country's architectural scene and in the development of an Australian style of architecture. His life and works have been fully appreciated in a recently written PhD thesis by Zenaida Edwards (*The Life and Work of Sir John Sulman 1849 – 1934*, University of Technology Sydney, 2006). In the chapter about Sulman's early works in England she discusses the designs of seven churches, one of which is the Milton Congregational Church (p.107-109).

Milton Congregational Church was founded following a split of the Gravesend and Milton congregation caused by the controversial then minister Wilhem Guest. The Congregational Church was located in Princess Street but in 1872, Guest and his followers moved into the newly built church at Clarence Place, which also served as chapel for Milton Mount College on Windmill Hill, a boarding school for the daughters of Congregational Ministers. In the early 1950s, following ever decreasing numbers in churchgoers, the two congregations re-united, as a consequence of which the building at Clarence place became surplus to the requirements of the Congregational Church. After a short spell of vacancy the building served first as a warehouse until it was acquired in 1967 by the Sikh community and it has since been in use as place of worship and community facility.

The Planning history for the above site is as following:

**GR/2003/0232** - Application for renewal of temporary planning permission for the temporary display of decorative lighting/bunting across Clarence Place in front of Gurdwara. Permitted 12 May 2003

**GR/2001/10294** – Retention of covered area at the side. Permitted 13 December 2001

**GR/2001/0158** – Temporary display of decorative lighting/bunting across Clarence Place in front of Gurdwara. Temporary permission granted 10 April 2001.

**GR/1999/0139** – Display of temporary cross street banner/archways and associated lighting at Trinity Road/Khalsa Avenue Junction for the Vaisakhi Festival – Permission Display of temporary cross street banners/archways and associated lighting for Vaisakhi Festival plus flags and lighting across Clarence Place and gates sides of Clarence Place and one side of Brandon Street - Refused

**GR/82/0417** – Erection of single storey side extension on the west side to form toilet accommodation and single storey extension on the east side to form entrance hall. Permitted 6 September 1982.

**GR/81/0487** – Retention of 0.63m high railings surmounting existing front boundary wall and retention of 2 sets of 2.25m high iron double gates. Permission 29 May 1981.

**GR/80/0891** - Erection of single storey extension at side to form lobby and toilet block. Permitted 17 November 1980.

**GR/80/0789** - Erection of single storey side extension for the parking of four cars and toilet accommodation. Withdrawn

**GR/80/0535** - Erection of two first floor side extensions for reading rooms. Permitted 19 February 1975.

**GR/74/0638** - Retention of former loading and unloading bays for use as entrance lobbies. Refused 4 April 1968

**TH2/68/39A** - Retention of and alterations to former loading and unloading bays for use an entrance lobbies. Permitted 8 July 1968

### **3. Proposal**

The proposal (GR/09/0487) is for the demolition of existing building and erection of two, four storey linked buildings with undercroft parking and vehicular access on to William Street, to provide a total of 19 self contained flats, comprising 16 two bedroom and three, one bedroom flats and erection of two, two storey three bedroom dwellings at the rear fronting William Street.

The Second proposal (GR/2009/0468) is an application for Conservation Area Consent for the demolition of the Siri Guru nanak Darbar Gurdwara.

Finally there is a third application for 11 The Grove (GR/2009/0486) for the conversion of building into six self contained flats, comprising four, one bedroom and two, two bedroom flats involving demolition of rear part of building and erection of two storey rear extension. This application is dealt with in a separate application and the proposal by the applicant is the 6 flats in The Grove will provide the off site affordable housing the proposed development at Clarence Place.

### **4. Development Plan**

The following policies from the Gravesham Local Plan First Review 1994 are of relevance to the determination of this application:

Policy H0	General Housing Policy
Policy H2	Application of Residential Design Guidance
Policy H3	Character of Housing Areas
Policy TC1	Design of New Developments
Policy TC3	Development Affecting Conservation Areas
Policy P3	Vehicle Parking Standards

The South East Plan (SEP), which is the name for the Regional Spatial Strategy for the South East of England, was formally published on 6 May 2009, and confirmed that the none of the policies contained within the Kent & Medway Structure Plan 2006 would be saved beyond their original three year lifespan. Whilst these policies are saved until 6 July 2009. The relevant policies from the South East Plan are as follows:

Policy BE6	Management of the Historic Environment
Policy T4	Parking

Policy H4	Type and Size of New Housing
Policy H5	Housing Design and Density
Policy S6	Community Infrastructure
Policy CC7	Infrastructure and Implementation

## 5. Reason for Report

At the request of Service Manager, Development Control

## 6. Consultations and Publicity

### Consultations

#### Southern Water Services:

Awaiting Comments

#### GBC Housing Development Manager:

See supplementary report.

#### Senior Development Engineer Gravesham Borough Council:

I have looked at the proposal for redeveloping the above as 16 x 2 bed flats; 3 x 1 bed flats; 2 x 3 bed house with underground car parking for 21 cars accessed from William Street.

The main issues are (a) the adequacy of the off street parking provision and (b) the suitability of the means of access.

On the first question, there are 21 car park spaces proposed for the 21 properties in a location which is close to the boundary of acceptability (given the high proportion of 2 and three bed properties). Although the site is within close proximity to the town centre and that, in its previous use, has never had the benefit of any off-street parking there is still the likelihood of multi car ownership within the site. With no visitors parking available, there is still likely to be demand for additional parking on the street. As there is no possibility of providing more parking space in the basement, I would recommend that the number of units should be reduced to allow at least two parking spaces to be available for visitors.

On the second question, William Street is narrow (4.5 metres wide) and on street parking would restrict the street to single file traffic in places. It is a cul de sac with limited traffic usage and low vehicle speeds. The site entrance is of a similar width which will enable two vehicles to pass and there are vision splays at the point of entry. I am therefore satisfied that cars can manoeuvre safely in and out of the site.

#### GBC Conservation Officer:

### Condition and significance

The church is a landmark building that in terms of its architectural qualities and historical associations clearly contributes positively to the special character of the

area. It is also a building of local interest and has been as such included in the Council's list of local interest buildings. Furthermore, the building has been identified as one of the key positive buildings in the recent appraisal of Windmill Hill Conservation Area undertaken by the Conservation Studio.

Having been in constant use the building is in a good condition. To suit its new uses it has been altered and adapted over the years - not always in a sympathetic manner - but despite the loss of the original furnishing and fittings, it has retained much of its interest.

### **The Principle**

If listed or considered to be of merit and a positive building within a Conservation Area, PPG15 cautions the unnecessary loss of historic buildings and requires applicants to seriously investigate all possibilities for the building's retention and adaptation. Government guidance therefore requires owners who consider the demolition of a positive building in a Conservation Area to meet the same criteria as set out for listed buildings. It states that the Secretary of State would not expect consent for demolition of any listed building/building of merit in a Conservation Area to be given without '*clear and convincing evidence that*

- *all reasonable efforts have been made to sustain existing uses or find viable new uses, and these efforts have failed;*
- *preservation in some form of charitable or community ownership is not possible or suitable; or*
- *redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition.*

*The Secretaries of State would not expect consent to demolition to be given simply because*

- *redevelopment is economically more attractive to the developer than repair and re-use of a historic building, or*
- *because the developer acquired the building at a price that reflected the potential for redevelopment rather than the condition and constraints of the existing historic building. (PPG15, 3.17)*

As with regard to the adequacy of efforts to retain the building in use, PPG15 further sets out: *This should include the offer of the unrestricted freehold of the building on the open market at a realistic price reflecting the building's condition. (PPG15, 3.ii)*

### **Assessment**

The PPG15 Justification Statement that has been supplied by the applicant is unconvincing, playing down the qualities of the building and any potential for its re-use. The Authority would contest the findings of this document. Since the building positively contributes to the special architectural and historic interest of the Windmill Hill Conservation Area, the case that its demolition and replacement would bring about an enhancement cannot be made. Therefore the authority is entitled to ask the applicant to meet the criteria as set out in government guidance.

The justification statement discusses possible alternative uses in a hypothetical way though there is no evidence that the feasibility of other uses, even conversion to residential, have been seriously investigated. There are some other unconvincing reasons given such as, for example, that the rendering of the exterior building with a cement render would, in the authors opinion, 'restrict any creative reuse proposals' (page 15).

Since the owner does not feel able to come forward with a scheme for its adaptation or conversion, the building should, as advised in PPG15, be offered on the open market. This marketing exercise has as yet not been undertaken. For a building of this kind, where a solution might not be an obvious one, The Council would suggest that the building should be offered on the market for **at least one year** and the applicant/owner should provide the following evidence:

- sales particulars;
- details of where and how the building was marketed;
- details of any expressions of interests, and
- details of reasons why interested parties did not feel able to take on the building.

The justification statement seeks to justify the re-development on the basis of the merits of the design of the new scheme. However, whilst these should be a material consideration, PPG 15 advises that '*subjective claims for the architectural merits of proposed replacement buildings should not in themselves be held to justify the demolition.*'

In summary of the above both the previous and current conservation officer considers that insufficient evidence has been submitted of efforts made to retain the building in use or to consider any options other than the demolition and re-development of the site.

### **Proposed scheme for re-development**

Should the authority consider the demolition of this building acceptable the following comments on the proposed scheme are made:

All development, but particularly in Conservation Areas, should respond to their immediate context, in terms of scale, density, form, materials and detailing. References to the Regency houses (Lacey Terrace) along Clarence Place have been made in terms of the roofscape and stylistic treatment of the elevations towards Clarence Place. However, the contextual approach ends with regard to plot ratio, building form, scale and density. This is essentially a 24m long, 9 window bays wide massive apartment block whose scale and massing is out of context with the surrounding suburban development and it imposes itself on to the streetscene. At a meeting between the applicant's architect and officers of the planning department, advice was given by officers as to how the scheme might be amended to better suit the conservation area context. Ultimately however, no changes reflecting the advice were made. As such it is considered that the scheme as proposed would fail to preserve and enhance the character and appearance of the Conservation Area.

#### Kent Police:

Awaiting Comments

#### Kent Fire and Rescue :

Awaiting Comments

#### GBC Regulatory Services:

There is no objection to the application subject to the following:

Contaminated Land

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the CLEA guidelines and CLR 11 methodology) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval. The desk study shall detail the history of the site uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved by the Local Planning Authority prior to investigations commencing on site.
- b) The site investigation, including relevant soil, soil gas, surface and groundwater sampling, shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- d) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.
- e) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.
- f) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

Domestic Refuse Arrangements - Multiple Occupation

Each dwelling should have sufficient storage capacity to cope with the waste generated in between collections (1 week). A large internal/external storage

area should be considered where there is more than one dwelling contained in a domestic block. The distance between the storage area and the collection point shall not be more than 30 metres.

Domestic Refuse Arrangements - Single Dwellings

The dwelling should have sufficient storage capacity to cope with the waste generated in between collections (1 week).

Domestic Refuse Arrangements - Advisory Notes

Plastic sacks are issued for solid waste storage and collection will be from the front entrance to the property adjacent to the road or footpath.

Works of Construction.

Please add code of construction practice informative.

Mouchel Parkman:

We write to advise that we have identified the above planning application to our clients in the Kent County Council's Children, Families & Education Directorate, Communities Directorate and Adult Social Services Directorate for them to assess whether the above development proposal will necessitate any County requirements.

We will advise as soon as we have their response and would request you reserve the County Council's position, until you hear further from us.

Windmill Hill Association:

A detailed objection letter is attached to this report. In addition to the letter of objection a petition with 49 names from local residents has been attached objecting to the scheme.

The Victorian Society:

The Society would like to register its **objection** to the demolition of the above building.

PPG15 makes it clear that the presumption should be that buildings which make a positive contribution to the character of a conservation area should be retained (section 4.27).

Despite a number of unsympathetic changes that have been made to the former chapel, it strongly retains its character as a Victorian Gothic church and is still a distinguished piece of architecture amongst the suburbs. As the historic report submitted with the application makes clear, the former chapel is a part of the history of the area and the rise of non-conformism in this country.

The characters of conservation areas are often inevitably varied and the applicant's apparent desire to homogenise the appearance of this street does not reflect the true diversity of its history. The chapel adds interest to the streetscape and skyline, and if renovated, could make an even more positive contribution to the area.

With imagination the building could be used for a use other than worship, only its exterior is protected which allows substantial scope for change. The demolition of

historic building is inappropriate at a time when sustainability is on everyone's agenda.

This is precisely the type of building which a conservation area is designed to protect. We recommend your authority refuses consent.

Spiritualist National Union:

On behalf of the Spiritualist National Union, we wish to object to the planning application in its current form.

We are the owners of the adjoining property being 19 Clarence Place, Gravesend and this has been utilized as Spiritualist Meeting Centre and the property was entered into sole trust with the Union in 1962, having been originally formed as an independent church in 1960.. Our property is Grade 2 listed and forms part of the conservation area.

It is accepted that the building, which is the subject of the application, is unlisted and therefore could be the subject of demolition and reconstruction for alternative uses.

*The Current Planning Application*

The planning application is for two, four-story linked buildings with undercroft parking and vehicular access from William Street to provide a total of 19 self contained flats, 16 two-bedroom flats and 31 bedroom flats together with the erection of two two-story three-bedroom dwellings at the rear fronting William Street.

First, in our respectful submission this is an over development of the site. On paper, the new construction will not complement the conservation area. With reference to occupation, it is likely to double the population in Clarence Place with subsequent substantial increases in vehicular traffic.

It also appears that the road system in the immediate area, particularly in the William Street is currently inadequate to cope with the potentially high numbers of vehicle movements at the rear of the new proposed development.

If demolition is permitted, then this is an opportunity for the Local Authority to consider an application, which would make any new development on the site blend in with the adjoining conservation properties. Thus giving a 21<sup>st</sup> century low-density development, which could complement the older properties in the conservation area.

It appears from the application that this is purely an exercise to achieve maximum capital return to the owners of the site by a severe over development. In our respectful submission, the whole scheme is not complementary in any way to the Gravesham's Heritage.

In the alternative, no consideration has been given for preserving the existing building and to convert the interior for resident accommodation. This alternative has not been investigated apparently by the proposed architects or the owners of the property.

Consultation Process

Apart from the public consultation meeting, neither the union nor the Church has had any approaches by the architect or owner and for any discussions concerning the impact of their proposals on our property.

Conclusions,

In our respectful submission, we can only repeat this appears to be a severe over development of the site and the new construction will merely replace an early 20th-century building with a modern construction, which will not blend in to a conservation area.

Publicity:

This application was publicised as a major development, affecting the character and appearance of a conservation area; a press notice was published, a site notice posted on site and neighbour notification letters sent to the local residents. This period of publicity expired on 24 July and representations from the following people were received:

Mrs Julie Aspinall:	4 Clarence Place
Mrs Cunningham	25 Clarence Place
Mr & Mrs Kilbane	28 Clarence Place
Mr Ross	6 Clarence Place
Mr Clay	1 Constitution Crescent
Mr & Mrs Moesli	26 Clarence Place
Mr & Mrs O'Mara	8 Clarence Place
Miss Lewis	17c Clarence Place

The following list summarises the main points raised by local residents during the consultation period:

- Objection to the principle of demolition of the existing building as PPG15 makes it clear that the presumption should be that buildings which make a positive contribution to the character of a Conservation Area should be retained (section 4.27)
- The proposal is overdevelopment of the site and is likely to double the population in Clarence Place with subsequent increases in traffic.
- The proposed scheme does not blend in with the existing street scene.
- Existing building could be kept and converted into residential
- Proposed development does not enhance nor preserve the Conservation Area.
- The former chapel represents part of the history of Gravesend and it should be preserved.
- Design of the building does not respect the streetscene, character of the area of wider Conservation Area.
- Mews Houses to the rear of the property are not in keeping with the character of the Victorian terraces of William Street.
- Internal layout of the flats is poor with inadequate space for storage and laundry
- Demolition will lead to the loss of an important local historic building which makes a positive contribution to the Windmill Hill Conservation Area.
- Concern that this development will lead to a oversupply of flats in Gravesend town centre.

## 7. Service Manager Development Control comments

The following comments, which will appraise the scheme in relation to the above consultation and neighbours' response, as well as development plan policy and national planning guidance.

The comments below will firstly deal with the principle of demolition in relation to national planning guidance PPG15. Next each element of the scheme will be considered in isolation in order to fully understand the works that are being proposed.

### Demolition of existing building:

Before the principle of the redevelopment on the site can be considered the principle of demolition needs to be assessed in relation with PPG15.

If listed or considered to be of merit and a positive building within a Conservation Area, PPG15 cautions the unnecessary loss of historic buildings and requires applicants to seriously investigate all possibilities for the building's retention and adaptation. Government guidance therefore requires owners who consider the demolition of a positive building in a Conservation Area to meet the same criteria as set out for listed buildings. It states that the Secretary of State would not expect consent for demolition of any listed building/building of merit in a Conservation Area to be given without '*clear and convincing evidence that*

- *all reasonable efforts have been made to sustain existing uses or find viable new uses, and these efforts have failed;*
- *preservation in some form of charitable or community ownership is not possible or suitable; or*
- *redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition.*

*The Secretaries of State would not expect consent to demolition to be given simply because*

- *redevelopment is economically more attractive to the developer than repair and re-use of a historic building, or*
- *because the developer acquired the building at a price that reflected the potential for redevelopment rather than the condition and constraints of the existing historic building.'* (PPG15, 3.17)

As with regard to the adequacy of efforts to retain the building in use, PPG15 further sets out: *This should include the offer of the unrestricted freehold of the building on the open market at a realistic price reflecting the building's condition.* (PPG15, 3.ii)

### Assessment:

The Conservation Officer considers that the PPG15 Justification Statement that has been supplied by the applicant is unconvincing, playing down the qualities of the building and any potential for it's re-use. Since the building positively contributes to the special architectural and historic interest of the Windmill Hill Conservation Area, the case that its demolition and replacement would bring about an enhancement cannot be made. Therefore the council is entitled to ask the applicant to meet the criteria as set out in government guidance.

The justification statement discusses possible alternative uses in a hypothetical way though there is no evidence that the feasibility of other uses, even conversion to residential, have been seriously investigated. There are some other unconvincing reasons given such as, for example, that the rendering of the exterior building with a cement render would, in the authors opinion, 'restrict any creative reuse proposals' (page 15).

Since the Gurdwara does not feel able to come forward with a scheme for its adaptation or conversion, the building should, as advised in PPG15, be offered on the open market. The Gurdwara advises that this marketing exercise has been undertaken, but no evidence of this is submitted by the applicant. For a building of this kind, where a solution might not be an obvious one, The Council would suggest that the building should be offered on the market for **at least one year** and the applicant/owner should provide the following evidence:

- sales particulars;
- details of where and how the building was marketed;
- details of any expressions of interests, and
- details of reasons why interested parties did not feel able to take on the building.

The justification statement seeks to justify the re-development on the basis of the merits of the design of the new scheme. However, whilst these should be a material consideration, PPG 15 advises that '*subjective claims for the architectural merits of proposed replacement buildings should not in themselves be held to justify the demolition.*'

It can therefore be concluded that the current application has failed to meet the criteria set out in PPG15 and it is the applicant's responsibility to provide the required evidence to support the application.

#### Impact on the Conservation Area/ Design:

The proposed redevelopment of the Sikh Temple, which was formally the Milton Congregational Church, is a landmark building within the Conservation Area and is identified as a building in need of a new use.

Clarence Place is one of the highest quality streets with the borough of Gravesham Consisting of a mixture of 19<sup>th</sup> Century properties varying in design, all of which add character to the streetscene and Conservation Area.

All development, but particularly in Conservation Areas, should respond to their immediate context in terms of scale, density, form, materials and detailing. References to the immediate context, in terms of scale, density, form, materials and detailing. References to the Regency houses (Lacey Terrace) along Clarence Place have been made in terms of the roofscape and stylistic treatment of the elevations towards Clarence Place.

However, beyond the above references to the surrounding properties the contextual approach ends with regard to plot ratio, building form, scale and density. This is essentially a 24.8m long, 9 window bays wide massive apartment block whose scale and massing is out of context with the surrounding suburban development and it imposes itself on to the streetscene.

Reference is made on the plans that the building proposed is not as high as the current building on the site. However the height of the proposed development being 12.5 metres high is significantly higher than the existing dwellings to the east and the west of the site. It should be noted that the existing building is an iconic public building which is significantly higher than the surrounding residential properties. Any residential development on the site should respect the streetscene which would require a significant reduction in the height and bulk of the building. To the east under the current proposal there would be step up from two to four storey which is unacceptable.

Rear of the property also raises series concerns. The rear part of the scheme has taken a much simpler approach and the only reference to the neighbouring buildings on Clarence Row are the use of sash windows. Beyond this the proposed rear of the building is bulky mass which will dominate the streetscene of William Street. Furthermore as the flank elevation of the development can be viewed clearly from Parrock Street this will result in further harm to the wider streetscene.

With any large building it is vital that the building proposed on the plot is in scale with the plot it is situated on unfortunately the existing Chapel has been compromised to a degree with a number of unsympathetic extensions up to the boundary on the north elevation. However, just because the current public building has been compromised it does not automatically give the right for the redevelopment on the site to fill up the space as the compromised structure did. If a scheme for redevelopment was found to be acceptable it should be reduced in footprint to give any new development a sense of spaciousness around the development.

The two mews houses to the rear of the property are not strictly in keeping with the character of William Street. However the use of velux windows at first floor in the mansard roof help reduce any overlooking onto the neighbouring bungalows on the north side of William Street.

#### Access and parking arrangements:

Parking provision for the development is to be provide underground and accessed from William Street from the north of the property. In terms of parking provision the following is being proposed:

- provision 21 car parking spaces including 4 for the disabled
- Storage space for 21 cycles in a secure area.

Following consultation with Senior Development Engineer (Gravesham) concern is raised that the proposed development providing 21 spaces for 21 units is not acceptable and there is no scope to provide any visitor spaces within the development. Therefore there is likely to be a demand for on street parking. To overcome the concern of the parking issue the scheme would need to be reduced in units to allow more provision of visitor parking spaces and the expected multi-car ownership which commonly occurs in 2 bedroom flats.

#### Impact on the surrounding properties:

The proposed development being under 2 metres from the boundary on the east and west and having a height of 12 metres from street level to ridge level will create a structure which will be overbearing for the neighboring properties which will be unacceptable impact on the neighboring properties.

Internal Layout:

All the proposed flats within the development are open plan with kitchen dining room, and living room all combined into one room. None of the flats within the proposal fail to meet the Council's Residential Layout Guidelines.

The two, three bedroom properties facing onto William Street are acceptable in terms of internal layout. However, these two properties have only one entrance, which goes straight onto Clarence Place. This means that these two dwellings have no direct access to the shared amenity space to the rear of the property. Therefore these two dwellings which would be orientated at families would result in people having to go straight onto William Street which will be unacceptable.

Amenity Space:

Directly opposite the site is the public park of Windmill Hill which would provide future residents with amenity space. To the rear of the main block there is shared amenity space provided for residents. It should be noted that no private amenity space is provided for the two three bedroom houses which is contrary to the Council's Residential Layout Guidelines which states three bedroom dwellings should have gardens with a maximum depth of 10 metres and a minimum garden space of 60m

Affordable Housing:

See supplementary report.

**Consultation expiry date: 24 July 2009**

**Recommendation: Defer back to Service Manager, Development Control for further negotiations.**