



Invicta Planning Ltd.
Chart House
10 Western Road
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Kent
TN15 8AG

Tel: 01732 885563

Ethan Bonthron
Planning Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

09 June 2025

Dear Ethan

**PLANNING APPLICATION REFERENCE 20250167
LAND AT MILTON PLACE, GRAVESEND**

I write further to our ongoing discussions in relation to the above application for residential development on land at Milton Place, Gravesend. This letter encloses a suite of amended plans/documents which I outline below together with an updated drawing and document schedule.

Architectural Amendments

The consultation responses from Historic England and the Council's Conservation Officer did not raise objections to the proposals but offered various suggestions to enhance the appearance of the development and reduce the impact upon nearby heritage assets.

The Applicants welcomed the opportunity to work with the Council both at pre-application and post submission stages and have updated the architectural design as follows:

- Houses:
 - Alteration in roof form of dwellings to the north to provide gable frontages
- Apartment Building:
 - Lowering of part of roof to Milton Place frontage to provide stepped elevation
 - Introduction of a brick recess section to create greater shadow and visual interest
 - Inclusion of alternative brick detailing underneath bedroom windows to main elevation (on corner of Milton Place and Ordnance Road)
 - Provision of cream brick banding to elevations

We also include CGI images and perspective views to provide visualisations of how the development will look once the development is completed.



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Landscape and Layout

As a result of comments from KCC Highways and the Council's Refuse team some minor changes have been made to the Site layout as follows:

- Apartment Building:
 - Refuse Store: Relocated and increased in size to accommodate additional bins and ensure residential drag distances are within 30m. Two separate stores have been provided due to space constraints.
 - Cycle Store: Now combined into a single store for increased efficiency (no change to the number of cycle spaces; no adapted bike spaces provided due to space constraints).
 - Plant Room: Relocated to the northern side of the building to accommodate the above changes.
- Landscape:
 - The route between the apartment building and Plot 15 has been widened to 3m.
 - Minor adjustments made to pavements to align with new apartment block entrances.
 - Error on landscaping plans showing planting which impedes tracking corrected

Drainage

KCC Drainage as Lead Local Flood Authority (LLFA) comments raised no objections to the proposals and recommended a condition in relation to detailed surface water design. The Applicants have taken the opportunity to address comments made by the LLFA and have updated the surface water drainage strategy to include:

- Urban creep factor for the residential houses to allow for an increase in impermeable areas in the future should homeowners build structures such as extensions
- Inclusion of summer and winter CV values within the Causeway Flow Simulation Settings uplifted to a value of 1 as opposed to the default values of 0.75 and 0.84

These amendments have resulted in a minor deepening of the proposed SUDS basin but no other landscape or layout changes.

Highways

GCIP and the consultant team have worked positively and proactively with KCC Highways to address comments raised through the application process. This has resulted in KCC Highways removing its objection to the development proposals and making recommendation of a number of planning conditions.



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We accept the majority of the recommended Planning Conditions; however, we have the following comments:

- Suggestion of a condition for the inclusion of 4 adaptive bikes- there is not space within the cycle stores for adaptive bikes which take up quite substantial amounts of space.
- Requirement for the re-surfacing of Ordnance Road car park – as the Council is aware only part of the car park is in the control of GCIP/ is adopted highway; other land is in the control of a third party. This condition, if required, should therefore only relate to the land in the control of GCIP.
- As above, KCC Highways have requested the retention of all parking spaces within the Ordnance Road car park. Only part of the land is in the control of GCIP and the Applicant should therefore not be required to ensure the retention of all parking.

Other Amendments / Additional Information

As you are aware, the Applicant has previously submitted updated information in relation to highways and ecology to address specific comments from consultees. These are not re-submitted with this revised pack of information but are referenced in the updated drawing and document schedules below.

Next Steps

I trust the above and enclosed satisfactorily addresses all the outstanding consultation comments from both internal and external consultees to the Council and will enable the application to be reported positively to the Council's Planning Committee in due course.

We would welcome the opportunity to discuss any proposed conditions, including detailed wording and triggers as soon as possible. I can also confirm that GCIP is progressing with drafting of the S106 Agreement ahead of any Planning Committee.

Please do let me know if you require any additional information at this point.

Yours sincerely

Kate Holland BSc MA MRTPI
Planning Director



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Appendix 1

Drawing Number	Description
Architect	
02324-JTP-MP-ZZ-DR-A-00001 Rev P1	Location Plan
02324-JTP-MP-ZZ-DR-A-00002 Rev P1	Existing Site Plan
02324-JTP-MP-ZZ-DR-A-00003 Rev P1	Proposed Site Plan
02324-JTP-MP-00-DR-A-10101-Apartment Block-Level 00 Rev P3	Apartment Block GA Plan - Level 00
02324-JTP-MP-01-DR-A-10102-Apartment Block-Level 01 Rev P3	Apartment Block GA Plan - Level 01
02324-JTP-MP-02-DR-A-10103-Apartment Block-Level 02 Rev P3	Apartment Block GA Plan - Level 02
02324-JTP-MP-03-DR-A-10104-Apartment Block-Level 03 Rev P3	Apartment Block GA Plan - Level 03
02324-JTP-MP-04-DR-A-10105-Apartment Block-Level 04 Rev P1	Apartment Block GA Plan - Level 04
02324-JTP-MP-RF-DR-A-10106-Apartment Block-Level RF Rev P1	Apartment Block GA Plan - Level RF
02324-JTP-MP-ZZ-DR-A-10201-2B4P Galloway – Semi Rev P2	2B4P Galloway - Semi Detached
02324-JTP-MP-ZZ-DR-A-10202-3B5P Lewis – Detached Rev P1	3B5P Lewis - Detached
02324-JTP-MP-ZZ-DR-A-10203-3B6P Walbury - Semi - Type 01 Rev P1	3B6P Walbury - Semi - Type 01
02324-JTP-MP-ZZ-DR-A-10204-3B6P Walbury - Semi - Type 02 Rev P1	3B6P Walbury - Semi - Type 02
02324-JTP-MP-ZZ-DR-A-10205-3B6P Walbury-Detatched Rev P1	3B6P Walbury - Detatched
02324-JTP-MP-ZZ-DR-A-10206-4B7P Wainwright-Detached Rev P2	4B7P Wainwright - Detached



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02324-JTP-MP-00-DR-A-10001-Sitewide GA Plan-Level 00 Rev P3	Sitewide GA Plan - Level 00
02324-JTP-MP-01-DR-A-10002-Sitewide GA Plan-Level 01 Rev P3	Sitewide GA Plan - Level 01
02324-JTP-MP-02-DR-A-10003-Sitewide GA Plan-Level 02 Rev P3	Sitewide GA Plan - Level 02
02324-JTP-MP-03-DR-A-10004-Sitewide GA Plan-Level 03 Rev P3	Sitewide GA Plan - Level 03
02324-JTP-MP-04-DR-A-10005-Sitewide GA Plan-Level 04 Rev P3	Sitewide GA Plan - Level 04
02324-JTP-MP-RF-DR-A-10006-Sitewide GA Plan-Level RF Rev P1	Sitewide GA Plan - Level RF
02324-JTP-MP-XX-DR-A-11101-Apartment Block-Elevations 1-4 Rev P3	Apartment Block Elevations 1 - 4
02324-JTP-MP-XX-DR-A-11102-Apartment Block-Elevations 5-8 Rev P3	Apartment Block Elevations 5 - 8
02324-JTP-MP-XX-DR-A-11001-Site Elevations 1 & 2 Rev P3	Site Elevation 1 & 2
02324-JTP-MP-XX-DR-A-11002-Site Elevations 3 & 4 Rev P3	Site Elevation 3 & 4
02324-JTP-MP-XX-DR-A-11003-Site Elevations 5 & 6 Rev P3	Site Elevation 5 & 6
02324-JTP-MP-XX-DR-A-12001-Site Sections 1 & 2 Rev P3	Site Sections 1 & 2
02324-JTP-MP-XX-DR-A-12002-Site Sections 3 & 4 Rev P3	Site Sections 3 & 4
Landscape Architect	
12701-FPCR-XX-ZZ-DR-L-0005 Rev P06	Landscape General Arrangement Plan
12701-FPCR-XX-ZZ-DR-L-0006 Rev P07	Planting Plan



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Drainage	
10109-PTA-XX-XX-DR-C-9300 P03	Proposed Drainage Layout

Document	Date/Author
10109-PTA-XX-XX-RP-C-9071 Rev P02 Flood Risk Assessment and Drainage Strategy	PTA, February 2025
Ecological Impact Assessment Revision B	James Blake Associates, February 2025
Biodiversity Net Gain Assessment update May 2025	James Blake Associates
Statutory Biodiversity Metric Condition Assessment	James Blake Associates, May 2025
Energy Strategy R02	Energist, 20 February 2025
Historic Environment Impact Assessment	GHC Archaeology and Heritage, February 2025
Environmental Noise Assessment	Ian Sharland Limited, February 2025
Planning Statement	Invicta Planning Ltd, February 2025
Statement of Community Involvement	Pillory Barn, February 2025
Transport Statement 2302-048/TS/01	Transport Planning Associates, February 2025
Transport Technical Note 2302-048/TN/01	Transport Planning Associated, May 2025
Arboricultural Impact Assessment and Method Statement TCTC-19152-A	Tracy Clarke Tree Consultancy, February 2025
Utility Statement	19 February 2025
Design and Access Statement	JTP, February 2025
Phase 2 Geo Environmental Assessment Revision A AW/CS/P23-2862/02 Rev A	Create Consulting Engineers, January 2024