

PLANNING STATEMENT

PROPOSED RESIDENTIAL DEVELOPMENT OFF WORCESTER CLOSE, WORCESTER CLOSE, ISTEAD RISE

For:

GRAVESHAM BOROUGH COUNCIL

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BRINGING IDEAS TO LIFE

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PLANNING REPORT

ON: LAND OFF WORCESTER CLOSE,

WORCESTER CLOSE, ISTEAD RISE

FOR: GRAVESHAM BOROUGH COUNCIL

FRANKHAM PROJECT NO.: 700564

Signature:

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1.0 INTRODUCTION

- 1.1 This planning statement has been prepared by Frankham Projects on behalf of Gravesham Borough Council (the 'Applicant') to support a detailed planning application submitted to Gravesham Borough Council (GBC) for the construction of 8 new dwellings on land off Worcester Close, Worcester Close in Istead Rise.
- 1.2 Full planning permission is sought for the following:
- "Construction of 8 new affordable rent residential units (Use Class C3) with associated vehicular and pedestrian access, car parking, cycle parking, refuse storage and landscaping"*
- 1.3 The Applicant has identified the site as having the potential to provide 8 new affordable homes.
- 1.4 The proposals have been discussed with GBC planning officers as part of the pre-application process. Consultation has also taken place with key stakeholders, community groups and local residents.
- 1.5 This planning statement appraises the scheme within the context of the planning policies set out in the NPPF and the Council's Development Plan. It is set out as follows:
- Section 2 describes the site and surroundings;
 - Section 3 provides an overview of the proposed development;
 - Section 4 summarises the relevant national and local planning policies;
 - Section 5 assesses the scheme against the relevant national and local planning policies with regards to the key planning considerations including the principle of the development, design, landscaping, residential amenity, highways and environmental matters; and
 - Section 6 draws together the conclusions.
- 1.6 This planning statement should be read in conjunction with the following documents and drawings which form part of the overall planning application submission:
- Application Form and Notices;
 - Site Location Plan;
 - Drawings prepared by BPTW;
 - Design and Access Statement including Landscape Strategy prepared by BPTW;
 - External Lighting Strategy prepared by Frankham;
 - Statement of Community Involvement prepared by Frankham;
 - Transport Statement prepared by Motion;
 - Arboricultural Report prepared by The Mayhew Consultancy Ltd;
 - Archaeological Desk Based Assessment prepared by Allen Archaeology Limited;
 - Drainage Impact Assessment & Flood Risk Assessment prepared by Tridax;
 - Energy Statement prepared by Weald Energy;
 - Preliminary Ecological Appraisal prepared by the Ecology Partnership;
 - Ground Investigations Preliminary Assessment prepared by Soils Limited;
 - Detailed Unexploded Ordnance Risk Assessment prepared by 1st Line Defence; and

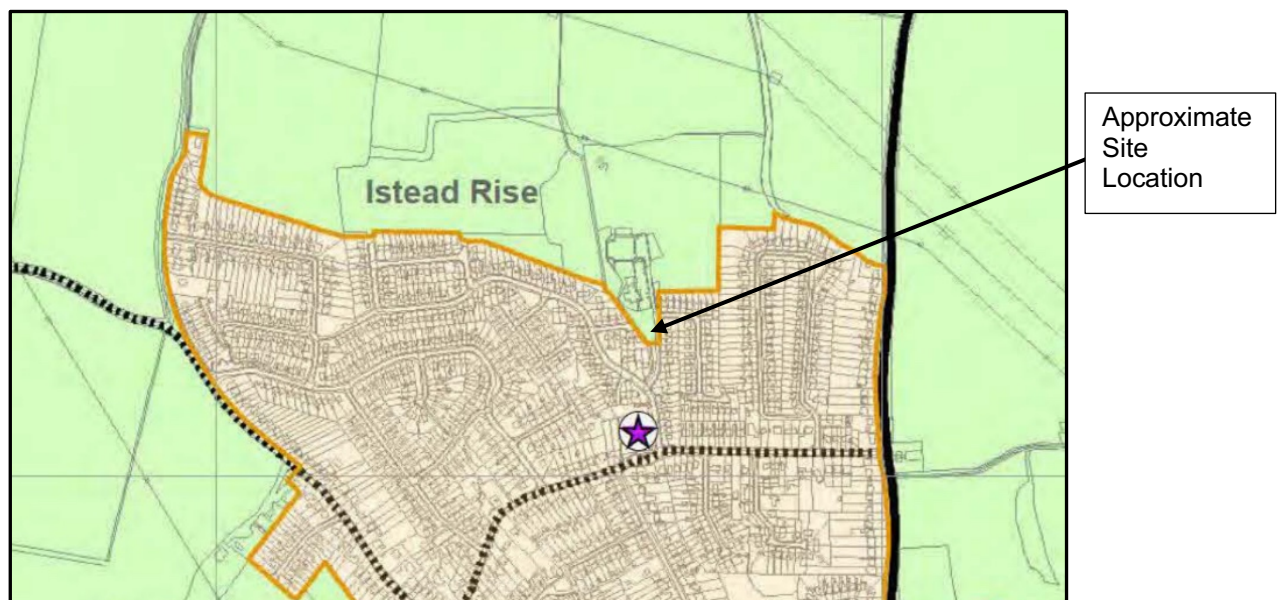
- Noise Impact Assessment prepared by Parker Jones Acoustics.

2.0 SITE AND SURROUNDING AREA

- 2.2 The application site, known as 'Land off Worcester Close' is located in Istead Rise, approximately five kilometres south of Gravesend. The site extends to approximately 0.14 hectares.
- 2.3 The site forms an irregular triangular shape and as existing comprises grassland, scrub and a number of scattered trees.
- 2.4 To the north of the site lies the Downs Way Medical Practice and the Istead Rise Community Centre. The south of the site abuts Worcester Close and to the west lies Bramley Close. With the exception of the medical practice and community centre, the surrounding area is predominantly residential. An existing public bridleway runs along the western boundary of the site. Part of this bridleway lies within the site, but is currently inaccessible due to overgrown vegetation.
- 2.5 There is a significant level change in the northern part of the site of approximately 1 metre. There is also a gradual level change running east to west across the site.
- 2.6 The nearest local facilities lie further to the south on The Drove Way where there is a parade of local shops including a Co-Op convenience store.
- 2.7 The site is well connected to modes of transport other than the private car. The nearest bus stops are 220 metres to the south of the site with frequent services to Sevenoaks, Bluewater and Gravesend. Meopham railway station is located approximately 2.8 kilometres to the south of the site with services to London Victoria, Ramsgate and Dover. There is also an existing cycle trail which connects Istead Rise to Gravesend along the A227.

Planning Policy Designations

- 2.8 As shown on the Gravesham local plan policies map (2014) the site is located in the Green Belt and is located just outside the existing settlement boundary as shown on the plan extract below.



- 2.9 The site is not located within a Conservation Area and does not contain any heritage assets. The Site is located within Flood Zone 1 (lowest probability of flood risk). There are no Tree Preservation Orders on the site.

Emerging Planning Policy Designations

- 2.10 The site is identified within the latest iteration of the Council's Strategic Housing Land Availability Assessment, which was published at the end of 2020, which was undertaken as part of the Council's Regulation 18 consultation on its Emerging Local Plan Partial Review, Site Allocations and Development Management Policies. Within this document the application site is identified as 'GB08 Land adjoining Bramley Close Istead Rise', but has been discounted because it falls below the threshold.

3.0 PRE-APPLICATION DISCUSSIONS

- 3.1 The proposals have been discussed with officers from the planning team and various changes have been made to the scheme as a result of the feedback received. These discussions are summarised below and in the accompanying Design and Access Statement.
- 3.2 An initial pre-application meeting took place in April 2022, where a proposal with 9 units within a single block containing one and two bedroom apartments was presented. Planning officers commented that the scheme should seek to maximise the frontage onto Worcester Close, reflect the established building line of the adjacent properties on Bramley Close and look to retain the existing trees on the south of the site.
- 3.3 A second pre-application meeting took place in July 2022 where a revised scheme was presented comprising a 'L' shaped building with 8 units to provide an enhanced frontage onto Worcester Close and to better reflect the building line of the properties on Bramley Close. Feedback was provided as follows:
- Principle of development acceptable.
 - Concerns with over-development and the size of the building footprint.
 - Concerns that the balconies overlooking Worcester Close were too overbearing and not in-keeping with the surrounding area;
 - Landscaping proposals to consider the existing pedestrian path running along the west of the site.
 - Off-site replacement tree planting agreed in principle.
 - Concern regarding daylight and sunlight and view for north facing rooms.
- 3.4 The second pre-application meeting was followed up with a further Addendum with further changes in October 2022.
- 3.5 The technical reports required for the planning application were also confirmed through the pre-application discussions.

4.0 THE PROPOSALS

4.1 Full planning permission is sought for the following:

"Construction of 8 new affordable rent residential units (Use Class C3) with associated vehicular and pedestrian access, car parking, cycle parking, refuse storage and landscaping"

4.2 As set out in the accompanying accommodation schedule within the Design and Access Statement, the proposals will provide 8 new units comprising:

- 4 x 1B2P apartments (50%);
- 2 x 2B3P apartments (25%); and
- 2 x 2B4P apartments (25%).

4.3 All of the apartments will be 'Affordable Rent' tenure. All will meet M4(2) standards internally, however only two of the units will meet this standard externally. All of the apartments will meet the prescribed national space standards.

4.4 A new vehicular access road will be created in the south of the site providing access to car parking and for delivery and emergency vehicles. A total of 10 car parking spaces will be provided including 2 visitor spaces. Two of the ground floor units have a dedicated, secure and covered cycle store with direct access. There will also be an internal secure cycle store for electric cycles and a communal, secure and covered external cycle store. With regard to electric vehicle charging spaces, the 8 proposed new parking spaces for residents will have active electric vehicle charging points, with the 2 visitor spaces being passive.

4.5 Private external amenity space in the form of patios/gardens with low level brick walls or railings provided for the ground floor units.

4.6 The new block will be set within a landscaped communal garden with high quality hard and soft landscaping. The existing bridleway running to the west of the site will be retained and it is proposed to provide a 1.2 metre high open railing with a hedge behind to provide security for residents, whilst ensuring visual permeability for pedestrians using the path. Cycle and refuse stores will be provided and will be formed of timber enclosures screened with planting.

4.7 The design of the new block takes inspiration from the surrounding area with steep, defined gable ends, pitched roofs and strong symmetry. Proposed materials include tile and shingle cladding to the upper levels and contrasting brickwork. There will also be soldier course detailing above the ground floor windows to differentiate between the ground and first floor. The design of the scheme is discussed further and in detail in the accompanying Design and Access Statement.

4.8 In order to facilitate the development, it is proposed to remove some of the existing trees on the site.

4.9 The proposal will include a range of energy saving measures including highly efficient air-source heat pumps within acoustic enclosures, a roof mounted PV array and LED lighting.

5.0 PLANNING POLICY CONTEXT

- 5.1 This section provides a summary of the national and local development plan policies against which the application will be assessed. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

National Planning Policy and Guidance National Planning Policy Framework ('NPPF') and Planning Practice Guidance ('PPG') (July 2021)

- 5.2 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF contains national policy on a range of topic areas including decision-taking, viability, affordable housing, design, open space and the economy. The 'presumption in favour of sustainable development' remains the central tenet of the NPPF.
- 5.3 Paragraph 10 of the NPPF sets out a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.4 Paragraph 11 of the NPPF states that decision makers should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where plans are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.5 The NPPF refers specifically to the need to boost the supply of homes and that land with planning permission is developed without unnecessary delay. The NPPF also highlights the need for affordable housing to be met on sites in the majority of cases and notes that small and medium sized sites can make an important contribution to meeting housing requirements.

- 5.6 Chapter 8 of the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 5.7 Chapter 9 of the NPPF highlights the requirement to consider transport issues from the earliest stages of development proposals and to ensure that opportunities to promote walking, cycling and the use of public transport are identified. The NPPF also notes that maximum parking standards for residential should only be set where there is clear and compelling justification that they are necessary.
- 5.8 Chapter 11 of the NPPF sets out policies for Making Effective Use of Land. Paragraph 120 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 124 considers achieving appropriate densities by taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 5.9 Paragraph 125 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 5.10 Chapter 13 of the NPPF covers the Green Belt. Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.11 Paragraph 149 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt with a limited number of exceptions. One exception to this is 'limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)'.
- 5.12 The NPPF also highlights the importance of achieving well designed places, which function well and add to the overall quality of the area or the long term. Developments should also be sympathetic to local character including landscape setting and the built environment. It also states the need to enhance the natural environment including protecting and enhancing valued

landscapes and biodiversity. Chapter 14 of the NPPF highlights the need to ensure that development contributes towards the government's targets for a low carbon future.

- 5.13 The PPG is published by Government to provide further detailed guidance on the application of policies set out in the NPPF.

The Development Plan

- 5.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.15 The current adopted development plan comprises the adopted Gravesham Local Plan Core Strategy (September 2014) and saved policies from the adopted Gravesham Local Plan First Review (1994). Greater weight is given to those policies which are consistent with the National Planning Policy Framework (NPPF, paragraph 47).
- 5.16 GBC undertook a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need.
- 5.17 The Council has also adopted a number of Supplementary Planning Guidance documents. Of relevance are:
- SPG2 – Residential Layout Guidelines (1996) (amended June 2020 to reflect National Housing Standards);
 - SPG4 – KCC Parking Standards (2006);
 - Housing Standards Policy Statement, 1st October, 2015;
 - Technical Housing Standards: Nationally Described Space Standards;
 - KCC Guide to Development Contributions and the Provision of Community Infrastructure (2007);
 - National Design Guide (January 2021);
 - Kent Design Guide; and
 - Planning Guidance on Waste Collection Requirements (2019).

- 5.18 The relevant Development Plan Policies include:

Gravesham Local Plan Core Strategy (September 2014)

- CS01 – Sustainable Development;
- CS02 – Scale & Distribution of Development;
- CS11 – Transport;
- CS12 – Green Infrastructure;
- CS13 – Green Space, Sport and Recreation;
- CS14 – Housing Type and Size;
- CS15 – Housing Density;
- CS16 – Affordable Housing;
- CS18 – Climate Change; and

- CS19 – Development and Design Principles.

Saved Policies from Gravesham Local Plan First Review (November 2014)

- P3 – Vehicle Parking Standards;
- T1 – Impact of Development on the Highway Network;
- T5 – Access to the Identified Highway Network;
- T5 – New Access onto Highway Network; and
- LT6 – Additional Open Space in New Housing Developments.

6.0 ASSESSMENT

- 6.1 The following section assesses the scheme against the NPPF, the relevant Development Plan policies as well as any material considerations. The key planning considerations are also considered in detail.

Principle of development

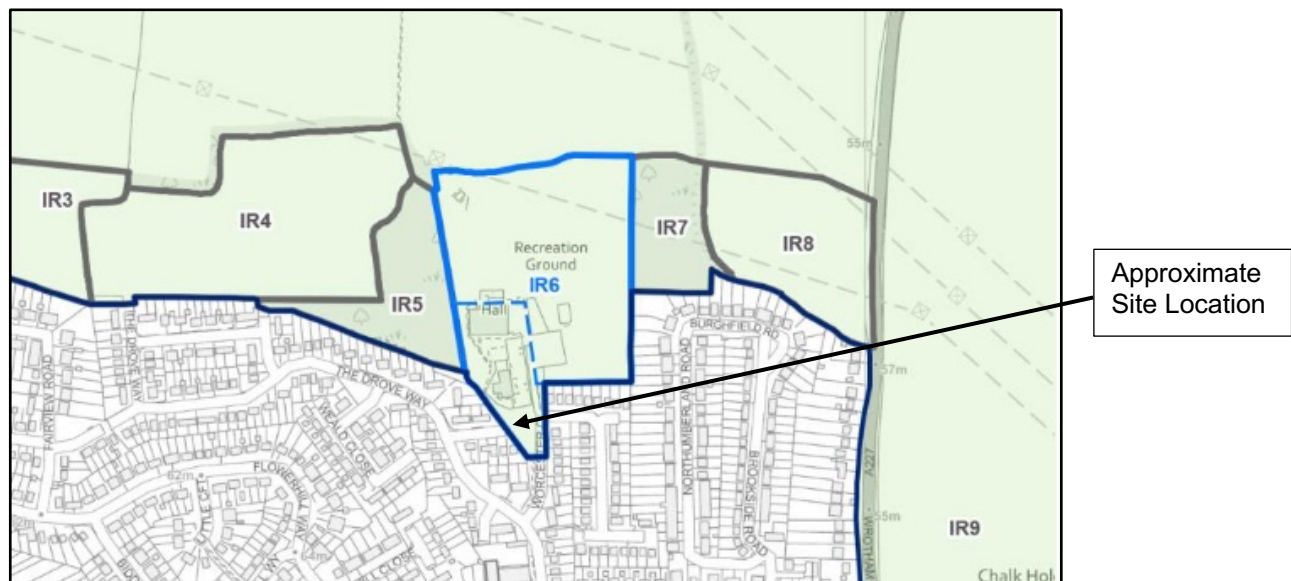
- 6.2 As set out in the NPPF, the issue of sustainability is multi-faceted, incorporating economic, social and environmental considerations. The application site is in a sustainable location with good access to local services, as well as a regular bus services to Gravesend, where a wide range of facilities are available. The site's sustainable location makes its suitable for the provision of new homes in principle.
- 6.3 Whilst the site is outside of the settlement boundary of Istead Rise as indicated on the Council's Proposals Map, the site is surrounded by built form and lies adjacent to the settlement boundary. Local Plan Core Strategy Policy CS01 (Sustainable Development) identifies Istead Rise as a Second Tier Settlement, only less sustainable than the urban area of Gravesend/Northfleet/Ebbsfleet.
- 6.4 GBC currently cannot demonstrate a five year housing supply in line with the requirements of paragraph 74 of the NPPF. The proposals will contribute towards GBC's five year housing supply and will provide 8 one and two bedroom affordable homes in a sustainable location.
- 6.5 As GBC is unable to demonstrate a five year housing supply, footnote 7 of the NPPF is engaged, which means that planning applications for the provision of new housing should be granted in line with the NPPF unless NPPF policies would provide a clear reason for refusing the proposals or if any adverse impacts of the proposals would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

Green Belt

- 6.6 The application site lies within the Green Belt as shown on the Council's adopted proposals map. The Local Plan Core Strategy notes that the purpose of the Green Belt in Gravesham is:
- To maintain the break in development between the eastern edge of Gravesham and the Medway Towns which is one of the few barriers preventing the further eastward sprawl of London and the merging of towns along the southern part of the Thames Estuary;
 - To assist in safeguarding the countryside by minimising the expansion of the Borough's rural settlements; and
 - To assist in concentrating development on underused, derelict and previously developed land in the urban areas of Gravesend and Northfleet.
- 6.7 The NPPF states that the construction of new buildings is inappropriate in the Green Belt, however an exception is 'limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)'. Local Plan Core Strategy Policy CS02 (Scale and Distribution of Development) notes that development will be supported

within those rural settlements inset from the Green Belt and defined on the Proposals Map. The policy states that development outside those settlements, including affordable housing will be supported where it is compatible with national policies for protecting the Green Belt and other policies in the development plan. It is also noted that Local Plan Core Strategy Policy CS16 (Affordable Housing) states at para 5.12.13 that in the Green Belt, limited affordable housing in a sustainable location for a proven and justifiable local community need will be supported.

- 6.8 The proposals will provide eight new affordable homes to meet a local need in the community of Istead Rise. Notwithstanding this, it is considered that there are 'exceptional circumstances' to justify the development of this site and that the harm to the Green Belt is minimal and is outweighed by the benefits of the scheme.
- 6.9 Gravesham Stage 2 Green Belt Study (August 2020) defines the application site (and the health centre and community centre to the north) as a 'Green Belt sub-parcel' forming part of a larger parcel of land referred to as 'Parcel ID6' as shown on the following diagram.



- 6.10 The Stage 2 Green Belt Study describes Parcel IR6 as follows:

"slightly elevated land containing playing fields, a play area, the buildings of Istead Rise Community Centre, the Istead Rise Medical Centre and associated car parking areas, adjacent to the northern edge of Istead Rise. The Community Centre, Medical Centre and associated car parking constitute urbanising development, but the rest of the parcel is open and uncontained by urbanising development, although its usage creates an association with the urban area. The boundaries of residential gardens on the northern edge of Istead Rise create minimal distinction between the Green Belt and the adjacent urban edge, and the combination of relatively small parcel size and strong woodland and hedgerow boundaries help to strengthen association with urbanising uses to the south".

- 6.11 The study states that the release of this land on the contribution of adjacent land to the Green Belt would create minor containment of open land to the east and west, but the strength of its woodland boundaries would limit this impact. The release would result in a slightly stronger

revised boundary marked by woodland and tree cover. It states that release of the parcel would constitute relatively limited encroachment on countryside and a minor weakening of the integrity of adjacent Green Belt land. The study concludes that the harm to the purposes of the Green Belt of releasing this parcel would be low-moderate. The study also notes that limiting the release of land to the developed area (Community Centre, Medical Centre and associated car parking), which lies on the inset settlement edge, would cause low harm to Green Belt purposes.

- 6.12 In light of the above, it is considered that the development of the application site, which is surrounded by existing building in the form of the medical centre to the north and residential homes to the east, west and south, would result in a low level of harm to the Green Belt. The proposals will not result in any adverse impacts on the character or openness of the Green Belt and will provide affordable housing in a sustainable location. The proposal will not adversely impact on the planning purposes of the Green Belt.

Efficient Use of Land

- 6.13 There are various constraints on the site, which have informed the proposals. The site is an irregular triangular shape with a wider frontage to the north. The site is also subject to a significant level change and there are a number of existing trees.
- 6.14 Paragraph 124 of the NPPF notes that densities should reflect the need for different types of housing, the availability of land, viability, and the desirability of maintaining an area's prevailing character. The proposal seeks to make the most efficient use of land, whilst having full regard to the context of the site, including the character of the surrounding area.
- 6.15 The proposed layout has been developed over time and seeks to enhance the active frontage onto Worcester Close. The proposed building comprises an 'L' shape footprint which has been designed to respect the existing building lines along Bramley Close and Worcester Close, whilst responding to the proportions of nearby residential properties. The layout also seeks to maximise the quantum of external amenity space and landscaping.
- 6.16 The site area is 0.14 hectares and the proposed density is 57 units per hectare. This is considered to be an appropriate density taking into account the character of the surrounding area and represents the most efficient use of land in the context of the site constraints and the need to ensure no adverse amenity impacts on existing and proposed residents with adequate separation distances.
- 6.17 Overall, in the context of the site constraints, the proposals make the most efficient use of land and achieve appropriate densities in accordance with the NPPF and Local Plan Core Strategy Policy CS15 (Housing Densities).

Housing

- 6.18 Local Plan Core Strategy Policy CS14 (Housing Type and Size) states that the Council will expect new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need, to create sustainable and balanced communities.

6.19 The proposals will provide 8 new affordable rent units comprising:

- 4 x 1B2P apartments (50%);
- 2 x 2B3P apartments (25%); and
- 2 x 2B4P apartments (25%).

6.20 All of the apartments will be 'Affordable Rent' tenure. All will meet M4(2) standards internally, however only two of the units will meet this standard externally. All of the apartments will meet the prescribed national space standards. This accords with the Council's Residential Layout Guidance Supplementary Planning Guidance (June 2020).

6.21 The proposed mix has been informed through discussions with the Council's housing team to ensure it meets an identified local need. The July 2017 Istead Rise Rural Housing Needs Survey identified a need for up to 10 homes for local people who are in need of affordable housing, including 5 single persons, 4 couples and 1 family.

6.22 In addition to this detailed survey, the Council's current housing register has 15 households registered for new affordable housing in the DA13 postcode area. This comprises households in need of 1, 2 and 3 bedroom housing for various reasons including medical needs, overcrowding or the need to downsize. It is proposed that households needing to downsize and who have a local connection to Istead Rise could be prioritised for the ground floor one bedroom accommodation particularly.

6.23 The Council's intention is that the new homes are for local people. Once the new homes are completed, they will be advertised on Kent Home Choice or the equivalent Choice Based Lettings system for households on the Housing Register who have a defined local connection to Istead Rise. Whilst the exact details of 'local connection' is not yet defined, it is likely to be via a current or previous residency in the settlement for the past 5 years, or a through direct close family living in the settlement, (parents, children over 18, brothers or sisters), or through employment or providing an essential service in the settlement.

6.24 Should there not be enough applicants with a local connection for the new homes then the homes will be 'cascaded' to households with a local connection to the wider Meopham Parish area who are registered for housing with GBC.

6.25 100% of the units will be for affordable housing, which significantly exceeds the targets set out in Local Plan Core Strategy Policy CS16 (Affordable Housing) and represents a significant planning benefit.

Parking, Accessibility and Highway Safety

6.26 Paragraph 105 of the NPPF states that the planning system should actively manage patterns of growth, focussing significant development on locations which are sustainable through limiting the need to travel and offering a genuine choice of modes of transport. The site is in a sustainable location close to local amenities with regular bus services.

6.27 A new vehicular access will be provided from Worcester Close. This has been designed to ensure that adequate visibility splays are provided at all times.

- 6.28 The proposal will result in a negligible increase in trips to the site and as set out in the Transport Statement, the development will not result in any adverse impacts on the highway network in accordance with Local Plan Core Strategy Policy CS11 (Transport) and the relevant saved policies of the Local Plan Review.
- 6.29 The proposal will provide car parking in line with Kent County Council's adopted parking standards (KCC's Design Guide Review: Interim Note 3 Residential Parking November 2008) with one parking space per unit and two visitor spaces, resulting in a total of 10 car parking spaces overall. The 8 residents parking spaces will have active electric vehicle charging and the two visitor spaces will be passive. Secure and covered cycle parking will also be provided.

Refuse Storage and Collection Arrangements

- 6.30 Policy CS19 of the Local Plan Core Strategy requires new development to incorporate facilities for the storage and recycling of waste generated further clarification is provided in Planning Guidance on Waste Collection Requirements (2019).
- 6.31 A communal refuse, recycling and food waste store will be provided to serve all units. The refuse store is approximately 15 metres from Worcester Close, where the refuse vehicles from Gravesham's refuse team will stop to collect the refuse and recycling. No refuse vehicles will enter the site.

Ecology

- 6.32 The application is accompanied by a preliminary ecological assessment. The findings of the assessment note that the site is within 10 kilometres of three internationally designated nature conservation areas. The proposals would not have any major direct impacts on these sites. There are no statutory designated areas within 2 kilometres of the site, however it is noted that the site does fall within the impact risk zones for a number of SSSIs, specifically Shorne and Ashenbank Woods approximately 3 kilometres to the east. It is not considered that the proposals would result in any adverse impacts on these sites.
- 6.33 The assessment found that none of the scattered trees on the site were considered to support higher than 'negligible' roosting bat potential due to the lack of visible roosting features or to the size and age of the trees. The grassland habitats on the site were also considered to be of limited interest for foraging bats. The survey found no evidence of badger activity, but considers that the site could be suitable for foxes, hedgehogs and nesting and foraging birds.
- 6.34 The proposals will introduce bird boxes, which will be integrated into the new buildings at suitable levels on suitable elevations (the exact locations will be determined at the detailed design stage). Construction will also follow best practice recommendations to ensure that no small mammals are harmed and any external lighting will be 'bat friendly'. Overall, there is not considered to be any adverse or harmful effects on ecology arising from the development in line with Local Plan Core Strategy Policy CS12 (Green Infrastructure).

Trees

- 6.35 As set out in the accompanying Arboricultural Assessment a tree survey was carried out in August 2022. The survey recorded 13 individual trees and 2 groups of trees both on and off the site. The development will result in the removal of 11 trees on the site, identified as Category B and C trees.
- 6.36 Whilst it is regrettable that the development will result in the loss of 11 existing trees within the site boundary. This loss is considered to be warranted in order to ensure that the site can be developed as efficiently as possible, and the retention of additional trees would result in the delivery of significantly fewer affordable housing units. From an ecological perspective, the removal of the trees is not considered harmful.
- 6.37 The loss of the existing trees will be compensated for by the replacement planting of 4 new trees on site and at least 24 new trees off site in an area of adjacent open space, which will more than adequately compensate for the trees to be removed. As such, the proposals accord with local plan policy EN 12 (Trees, Woodland, Hedges and Development).

Drainage & Flood Risk

- 6.38 Paragraph 167 of the NPPF states that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.
- 6.39 The site is located within Flood Zone 1 and is considered to be at a low risk of flooding from all sources considered (fluvial / tidal, reservoir, surface water, groundwater, and artificial sources). The development will discharge to public foul sewers. A suitably designed Sustainable Urban Drainage System (SUDs) will also be implemented to deal with any increase in surface water, the design of which will be determined at the detailed design stage.
- 6.40 The proposals are therefore considered to accord with Local Plan Core Strategy Policy CS18 (Climate Change).

Energy and Sustainability

- 6.41 Local Plan Core Strategy Policy CS18 (Climate Change) states that the Council will seek to reduce the overall carbon footprint of the Borough. It is also noted that the Council declared a climate emergency including a target to make the Borough carbon neutral by 2030 at a full Council meeting on 25 June 2019.
- 6.42 The need to respond to the climate change emergency and provide significant energy saving measures has been considered from the outset and the proposals will comply with Part L of the Building Regulations.
- 6.43 As set out in the accompanying Energy Statement a 'fabric-first' approach has been adopted. All the units will benefit from highly efficient air-source heat pumps (within acoustic enclosures), a roof mounted PV array and LED lighting.

- 6.44 During the demolition and construction phase, measures to minimise the amount of waste going to land-fill will also be put in place once a contractor is appointed.

Noise

- 6.45 It is not considered that the development will result in an adverse noise impacts in line with Local Plan Core Strategy Policy CS19 (Development and Design Principles). This is discussed further in the accompanying Noise Impact Assessment and the recommended mitigation measures will be incorporated into the design.

Land Contamination

- 6.46 A Phase 1 Preliminary Risk Assessment has been undertaken for the site, which concludes that no potential for significant risk of contamination has been identified. A UXO Study has also been carried out which confirms that there is low to negligible risk from UXOs across the site. As such, the proposals accord with Local Plan Core Strategy Policy CS19 (Development and Design Principles), which indicates that new development will be located, designed and constructed to avoid adverse environmental impacts from land contamination.

Archaeology

- 6.47 An archaeological desk based assessment has been undertaken. This report concludes that there is a negligible archaeological potential for the site and as such accords with Local Plan Core Strategy Policy CS20 (Heritage and the Historic Environment) and the NPPF.

Design

- 6.48 The layout of the proposal reflects the site constraints, but also the need to ensure that there are no adverse impacts on existing and proposed residents. Consideration has also been given to the relationship of the new buildings with the existing buildings to ensure a harmonious relationship.
- 6.49 The design has evolved throughout the pre-application process in response to the feedback received and seeks to reflect the character of the local area. This is discussed further in the accompanying Design and Access Statement.
- 6.50 The design follows the principles set out in Local Plan Policy CS19 (Development and Design Principles) and seeks to achieve a high standard of urban and architectural design. The new block will be an 'L' shape and extends to two storeys, reflecting the scale of the houses in the surrounding area.
- 6.51 The proposed materials have been chosen to reflect the character of the surrounding areas. Steep gable ends and pitched roofs are incorporated in the design, reflecting the presence of these in the area immediately surrounding the site, particularly along Bramley Close. This creates a harmonious relationship with the existing context.

Residential Amenity

- 6.52 Policy CS19 of the Local Plan Core Strategy requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and paragraph 130 of the NPPF (2021) requires development to have a high standard of amenity for existing users (In this case surrounding properties).
- 6.53 Throughout the design process, careful consideration has been given to ensuring that the new development provides a high quality of living accommodation for future occupiers including the provision of public and private amenity space, but also to ensuring that existing residents continue to enjoy a good living environment with no impact in terms of overlooking, overshadowing, privacy or loss of daylight/sunlight. This is discussed further in the Design and Access Statement.

Landscaping

- 6.54 The Design and Access Statement includes a landscape masterplan for the site and discusses the rationale for the proposed landscaping in more detail. New hedging is proposed along the site boundaries, and to provide separation between private and communal external amenity spaces.
- 6.55 A new area of amenity planting will be created with a wildflower mix. Porous surface paving is proposed for the car parking and access. Block paving will be used for the pedestrians paths. It is also proposed that the existing bridleway will be reinstated to its original route, ensuring that this public access is available at all times, which is a public benefit.

Section 106 Contributions

- 6.56 In line with the Council's policies a SAMMS payment will be made to mitigate any impacts arising from 8 new residential units on the Thames Estuary and Marshes Ramsar and SPA.

7.0 CONCLUSIONS

- 7.1 Overall it is considered that the proposal described in this planning application represents sustainable development as set out in the NPPF providing economic, social and environmental benefits.
- 7.2 Whilst the site is located in the Green Belt, it is surrounded by built form and its development will result in a low level of harm to the Green Belt. Notwithstanding this, the NPPF and the Local Plan Core Strategy recognise that affordable housing meeting a local need in the Green Belt is a form of development allowed in the Green Belt as an exception. The scheme will provide 8 affordable units.
- 7.3 Furthermore, GBC cannot demonstrate a five year supply of housing in accordance with paragraph 74 of the NPPF, which means that planning applications for the provision of new housing should be granted in line with the NPPF unless NPPF policies would provide a clear reason for refusing the proposals or if any adverse impacts of the proposals would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.
- 7.4 The scheme has been carefully considered to represent the most efficient use of land. All of the new homes will provide a high quality living environment for future residents with private and communal amenity space and will not result in any adverse impacts on amenity.
- 7.5 It is considered that the development will not result in any adverse impacts. Having regard to the presumption in favour of sustainable development and the requirements of paragraph 11 of the NPPF, planning permission should therefore be granted.