

Planning and Design Statement

For
Best Western Manor Hotel



In Support of Planning Application
at Manor Hotel, Hever Court Road,
Gravesend DA12 5UQ

July 2023



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1 INTRODUCTION

- 1.1 This Planning and Design Statement has been prepared on behalf of Best Western Manor Hotel in support of a full planning application for the redevelopment of the eastern part of the site (comprising part of the hotel car park) for a residential development comprising 12 new houses with associated access, private amenity space, vehicle parking provision, refuse and cycle storage.
- 1.2 The Statement addresses the following matters:
- A description of the site and surroundings;
 - A review of the background and history of the site;
 - A summary of historical pre-application consultation;
 - An explanation of the development proposal;
 - A review of relevant planning policy;
 - An appraisal of the relevant planning issues, and
 - Conclusions.
- 1.3 Accordingly, this Statement addresses the design principles and concepts that have been applied to the development in respect of the location, use, layout, scale, appearance and landscaping – in relation to the site's context. As such, the Statement meets the requirement to formally state how design and access issues have been considered.
- 1.4 The Statement should be read in conjunction with the other documents submitted in support of the application, namely:
- Drawings package (prepared by Sub Rosa Architecture);
 - Design and Access Statement (prepared by Sub Rosa Architecture);
 - Transport Statement (prepared by Vectos);
 - Preliminary Ecology Appraisal (prepared by ArbTech);
 - Drainage Assessment (prepared by Geoson);
 - Noise Assessment (prepared by Nova);
 - Energy Strategy (prepared by Element), and
 - Air Quality Assessment (prepared by Redmore).
- 1.5 The submissions conclude that the development proposal is acceptable, and supportable, in planning terms and that planning permission should be granted.

2 SITE AND SURROUNDINGS

- 2.1 The site comprises the two storey Best Western Manor Hotel and associated car park. The hotel itself is a private, family run facility which originally opened in 1991. It provides a total of 64 bedrooms together with associated business/function accommodation and ancillary uses including a restaurant.
- 2.2 The site is rectangular in shape and extends to 0.5 ha. It falls within the urban area of Gravesend, forming part of its south eastern fringes approximately 2.5 km to the south of the town centre.
- 2.3 The hotel building is positioned within the western part of the site, with the main car parking area (extending to 78 spaces) encompassing the central element (as shown on the 3D overhead image overleaf). The eastern part of the site comprises an overspill gravel parking area.
- 2.4 There is a single central vehicular access point into the central part of the site from Hever Court Road.
- 2.5 To the south of the site lies a footpath and landscaped green buffer extending to approximately 60 meters width, which separates the site from the A2 dual carriageway. To the west is a Premier Inn and The George public house/restaurant.
- 2.6 The north of the site abuts Hever Court Road, beyond which lies a large established residential area and park (known locally as Mackenzie Way open space). The visual character of the urban area predominantly comprises two storey semi detached and terraced residential properties.
- 2.7 In summary, the site comprises a hotel within the urban area that incorporates a large underutilised, overspill car parking area. Accordingly, the wider site is considered to represent an acceptable location (in principle) for new development subject to adhering to standard planning/design considerations and ensuring that there will be no adverse impact upon the operational requirements of the hotel.
- 2.8 A selection of site images/photographs is provided below.

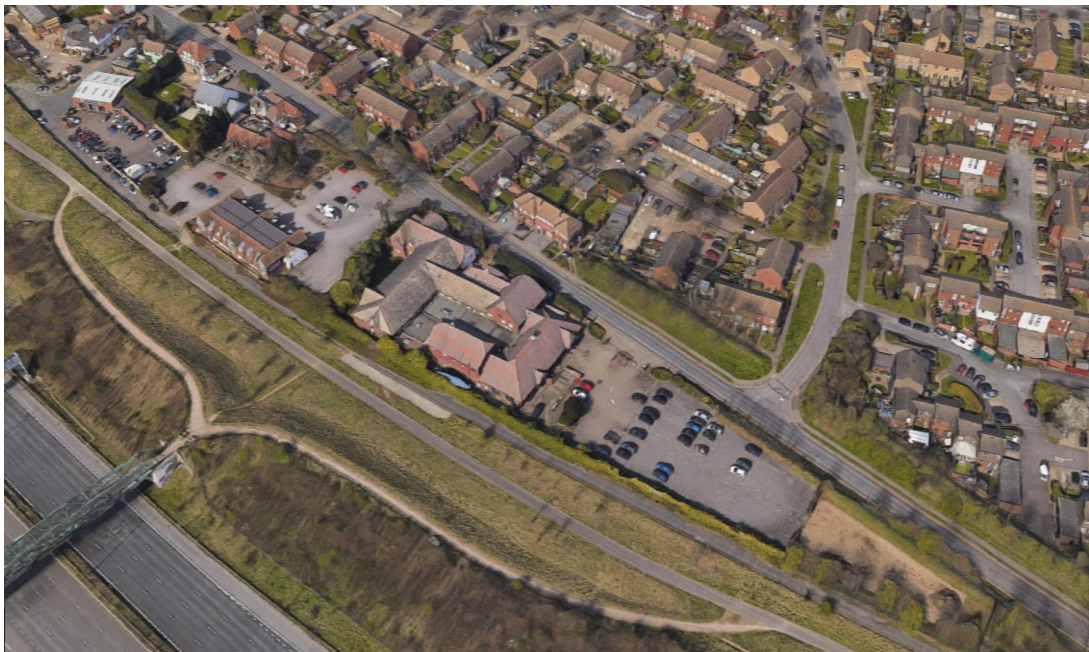


Image 1 - Overhead view of site showing hotel building, main car park and overspill gravel area



Image 2 - Photograph of hotel and existing site entrance from Hever Court Road to north



Image 3 – View of main car park facing west towards hotel



Image 4 – View of overspill car park facing east



Image 5 - View of overspill car park facing east

Background to Manor Hotel and the application proposal

- 2.9 The hotel is a private, family run facility which has been operational since 1991 and provided a range of employment opportunities for the local community throughout this period.
- 2.10 During recent years, occupancy levels and average daily room rates have both fallen resulting in reduced viability. This trend can be attributed, in part, to the introduction of 180 new budget hotel rooms within a 3 miles radius of the Manor Hotel. Furthermore, operating costs have risen in recent years and there has been a significant social change to both the needs of the overnight traveller and the event and function market sector.
- 2.11 The latter has resulted in less weddings and considerably fewer corporate meetings and events. By way of demonstration, in 2013 the Manor Hotel was host to over 25 weddings year in addition to numerous conferences and business meetings. By 2019, the number of weddings had reduced to 3. This means that the hotel's function suites are now significantly underutilised. The hotel is now only open to residents and no longer hosts any external functions or weddings.
- 2.12 Against this background, the owners of the hotel are seeking to undertake a series of internal reconfigurations which will result in the improvement of the hotel's offer by offering a mix of different room types that will help differentiate the hotel from the saturated local budget and limited service market.
- 2.13 It is proposed to introduce a selection of upgraded 4 star rooms and suites based on the fastest growing hotel sector in major UK cities and across the USA in conjunction with Best Western. The rooms will provide greater space and quality of service that is not currently available within the local area, enabling the continued operation of the hotel and preservation of existing jobs. The reconfigurations to existing rooms (as shown on the submitted floorplans) will result in the overall reduction on the number of rooms from 64 to 25.
- 2.14 To help fund this significant programme of works, the owners of the hotel are seeking to develop the existing underutilised overspill car parking area (and part of the existing hotel car park) for a new residential scheme with associated parking (which is the subject of this planning application).
- 2.15 Without the potential financial uplift that could be generated from this development, it is highly unlikely that the programme of modifications/improvements to the hotel would be viable.

3 PLANNING HISTORY

3.1 A review of the Council's records indicates that the site has been subject to several previous applications, the majority of which were associated with the use of the site as a hotel, as summarised below:

- **Ref 20200104** - Minor external alterations and reduction in car parking associated with the general enhancement of the Manor Hotel – Approved 11th June 2020;
- **Ref 20100882** - Display of internally illuminated free standing pole sign to replace existing – Approved 14th December 2010;
- **Ref 20100854** - Erection of part single storey, part 2/3/4 storey extension on eastern elevation to provide additional guest accommodation on first, second and third floors with coffee/games room, dining room, tv room, kitchen, lobby, wc accommodation and reception on ground floor with a link above functions room to additional rooms – Approved 10th December 2010;
- **Ref 20090027** - Partial demolition and erection of part four, part three, part two and single storey extensions to provide additional guest rooms (to make a total of 89 rooms), kitchen, brasserie, cafe/bar and offices with associated alterations – Approved 26th February 2009;
- **Ref 20080423** - Partial demolition and erection of part two store, part three storey extension to form 22 guest rooms, kitchen, cellar, bar, function room entrance hall, maintenance room, staff car parking and canvas entrance canopy with associated alterations – Approved 1st July 2008;
- **Ref 20000809** - Erection of two storey extension on the north elevation facing Hever Court Road to form eight additional guest rooms, demolition of the existing single storey buildings and erection of a single storey extension to form six additional guest rooms, enlarged restaurant and linen/garden stores incorporating the provision of new garden/courtyard on the south elevation facing A2; and alterations to the east elevation – Approved 11th January 2001;
- **Ref 19950440** - Erection of two storey extension on the north-west corner and conversion of the Manager's dwelling to provide 16 no. additional guest rooms; variation of conditions (vii) and (ii) of planning permission reference no. GR/90/815 and GR/92/336 to allow use of the pool and leisure facility for non-residents and revised landscaping scheme in pursuance of outline planning permission reference no. GR/86/158 – Approved 22nd August 1995;
- **Ref 19930039** - Construction of a roof over enclosed courtyard area – Approved 11th March 1993;
- **Ref 19920358** - Display of non-illuminated goal post sign facing west, 1 non-illuminated goal post sign at junction of A2 slip- road & Hever Court Rd, 1 non-illuminated panel set in- to the fence facing south, non-illuminated V shaped sign on south elev. at 1st floor level, 1 three sided advert & 1 neon hotel signs on east gable – Approved 9th October 1992;

- **Ref 19920336** - Erection of single storey extension on south elevation to form exercise room – Approved 21st July 1992;
- **Ref 19910469** - Erection of single storey extension on the north elevation to form hotel breakfast room/coffee lounge and erection of a conservatory on the west elevation of the manager's house – Approved 3rd February 1992, and
- **Ref 19910374** - Display of 2 free-standing externally illuminated double-sided goal post signs; 3 no flag-poles; externally illuminated projecting hanging sign; illuminated and non-illuminated individual lettering; externally illuminated panels inset to both sides of entrance walls to Hever Court Road – Refused 11th July 1991.

3.2 Most recently, an application (**Ref 20200105**) which proposed the redevelopment of the existing overspill car parking area situated to the east of the hotel to provide a B8 self-storage facility was approved by the Council on 12th June 2020.

3.3 A copy of the delegated report is attached at **Appendix 1**.

3.4 This planning permission was not implemented due to a lack of commercial demand.

4 PRE - APPLICATION CONSULTATION

- 4.1 The NPPF outlines the need for effective consultation as part of the development process and confirms the importance of early engagement with the local authority in association with the preparation of planning applications.
- 4.2 On 21st December 2018, the applicant submitted a formal pre-application enquiry to the Council for the development of the eastern part of the site (comprising the overspill car parking area) for a residential scheme comprising:
- 14 self-contained three bed residential apartments within a new three/four storey linear block;
 - Associated works including new parking provision for 28 vehicles, hard/soft landscaping, private/communal resident amenity space, secure refuse and cycling storage;
 - A new vehicular access from Hever Court Road to serve the new residential development.
 - In addition, the development proposal included minor external works to the western elevation of the hotel building resulting from reconfigurations that would reduce the total number of rooms from 68 to 35 and introduce 5 executive residency suites designed to provide enhanced accommodation for visitors. A reduced total of 68 car parking spaces would be retained to serve the hotel.
- 4.3 On 12th March 2019, a written response was received from the Council (please refer to **Appendix 2**). The response confirmed that the Council objected to the principle of new residential development at this location on the following basis:
- Part of the site formed part of an Air Quality Management Area (A2);
 - Traffic noise from the A2 and Hever Court Road, and
 - The 'isolated' nature of the site.
- 4.4 No objections were raised in relation to the proposed works and reconfigurations to the hotel or its reduced parking provision. These proposed works form part of a separate planning application submission.
- 4.5 Taking the pre-application feedback into account, the applicant has prepared an amended scheme which responds positively to the key concerns of Officers and is supported by a range of specialist reports which demonstrate that acceptable living conditions will be achieved for residents (including Air Quality and Noise Assessments).
- 4.6 Accordingly, discussions held with the Council have proven beneficial in refining the development proposal which forms the basis of this planning application.

5 THE PROPOSAL

- 5.1 As outlined within Section 2, the owners of the Manor Hotel are seeking to undertake a series of internal reconfigurations which will result in the improvement of its offer to visitors, enabling the site to evolve to meet modern requirements and helping to preserve the long term viability of a hotel use at this location.
- 5.2 It is proposed to introduce a selection of upgraded 4 star rooms and suites based on the fastest growing hotel sector in major UK cities and across the USA in conjunction with Best Western. The rooms will provide greater space and quality of service that is not currently available within the local area, enabling the continued operation of the hotel and preservation of existing jobs.
- 5.3 To help fund this significant programme of works, the hotel owners are seeking to develop the existing underutilised overspill car parking area (and part of the existing hotel car park) for a residential development comprising 12 new houses with associated access, private amenity space, vehicle parking provision, refuse and cycle storage. These works are the subject of this planning application.
- 5.4 Without the potential financial uplift that could be generated from this development, it is highly unlikely that the programme of modifications/improvements to the hotel would be viable.
- 5.5 Please refer to the full schedule of accommodation at the end of this Section.

Design Approach

- 5.6 As outlined within Section 2, the site to which this application relates comprises a large underutilised, car parking area.
- 5.7 The site is not located within a Conservation Area, albeit careful consideration has been afforded to ensure that all elements of the proposal respond positively to local distinctiveness and sit comfortably in terms of visual appearance and massing, whilst delivering a high quality contemporary design.
- 5.8 The scheme has been arranged in an efficient manner that will ensure the full potential of this previously developed accessible site is realised. The layout has been carefully considered taking the site's constraints and surroundings into account. The development also reflects the scale, density and character of the wider suburban residential neighbourhood.
- 5.9 The proposal represents a contemporary reinterpretation of the typical terraced dwellings within the streetscene to the north of Hever Court Road (a large number of which are separated into blocks comprising 4 or more dwellings). The proposed scheme seeks to incorporate many of the positive features of those houses.
- 5.11 As demonstrated on the plans which form part of this application submission, the site has been laid out as three individual blocks of four dwellings (Blocks A, B and C). This approach helps to break up the massing of the development into small blocks to reflect the general pattern of development within the wider area.
- 5.12 Private rear gardens are provided for occupiers of each dwelling as well as separate winter gardens and every opportunity has been taken to maximise soft landscaping and planting throughout the site.

- 5.13 The massing of the proposed houses within Blocks A and B extend vertically to two storeys to reflect the general height of structures in the locality and pitched roofs are incorporated to reflect the form and character of the surrounding houses.
- 5.14 The houses within Block C will extend to a similar height but will incorporate an additional bedroom within the roofspace. The rear elevations of these houses will incorporate contemporary dormers to provide views over the landscaped eastern apex of the site.
- 5.15 This approach ensures that the overall footprint of the proposed development will be minimised to create an efficient plan and layout.
- 5.16 Defensible landscaped space to the front elevations of the proposed houses at ground floor will ensure privacy between the units and mark the entrances to the houses. At first floor, additional bays are introduced which enable the creation of covered entrances and further fragment the overall forms of the dwellings. The bays are angled so that the views from the front elevation bedroom windows in Block C are directed away from the rear gardens of the houses within Block B to mitigate the potential for any overlooking impact.
- 5.17 The scheme proposes a simple palette of materials, namely facing brickwork, slates and zinc clad dormers. These materials are more durable than render and will help create a high quality, contemporary scheme.
- 5.18 Each new house will be served by private amenity space within ground floor garden areas ranging from a minimum 38 sqm up to over 83 sqm, which also include a winter garden extending to 9 sqm.
- 5.19 It should also be noted that each house comfortably exceeds the national floorspace standards and will benefit from being positioned closely to Mackenzie Way Park (approximately 150 metres to the east) and Hever Farm Recreation Area (350 metres to the north west).
- 5.20 The existing vehicular access junction will be reconfigured to become a shared access arrangement for the hotel and the residential element of the site and the residential dwellings will be accessed internally from the hotel car park as shown on the accompanying drawings package.
- 5.21 Footway improvements at the junction on Hever Court Road will facilitate pedestrian access at the east side of the entrance and road markings will delineate a route for pedestrians into the residential site as on-carriageway provision to the rear of the row of parking bays adjacent to Hever Court Road. In view of the low level of vehicle activity and the low-speed nature of the internal site layout, this access arrangement is considered to be appropriate for pedestrians with a minimal risk in terms of safety conflict.
- 5.22 It is proposed to provide a total of 24 car parking spaces to serve the residential dwellings, and this includes one disabled space. In addition, a motorcycle parking space will also be provided.
- 5.21 At ground floor level, provision is made within the site for safe and secure cycle and refuse storage as shown on the accompanying drawings. The dedicated refuse/recycling area is positioned centrally to the front elevation of the dwellings to ensure appropriate accessibility for residents and refuse operatives.

5.22 Overall, the considered design approach enables the creation of a visually interesting scheme which contributes in a positive manner to the streetscene as shown on the CGIs overleaf (and Section 7) as well as **Appendices 3, 4 and 5**.

House Number	National Space Standard Requirement	Gross Internal Area	Private Amenity Provision	Winter Garden
House 1 (2B/4P)	79 sqm	82.5 sqm	70 sqm private garden	9 sqm
House 2 (2B/4P)	79 sqm	82.5 sqm	35 sqm private garden	9 sqm
House 3 (2B/4P)	79 sqm	82.5 sqm	35 sqm private garden	9 sqm
House 4 (2B/4P)	79 sqm	82.5 sqm	59 sqm private garden	9 sqm
House 5 (2B/4P)	79 sqm	82.5 sqm	54 sqm private garden	9 sqm
House 6 (2B/4P)	79 sqm	82.5 sqm	29 sqm private garden	9 sqm
House 7 (2B/4P)	79 sqm	82.5 sqm	29 sqm private garden	9 sqm
House 8 (2B/4P)	79 sqm	115 sqm	45 sqm private garden	9 sqm
House 9 (3B/6P)	108 sqm	115 sqm	70 sqm private garden	9 sqm
House 10 (3B/6P)	108 sqm	115 sqm	51 sqm private garden	9 sqm
House 11 (3B/6P)	108 sqm	115 sqm	51 sqm private garden	9 sqm
House 12 (3B/6P)	108 sqm	115 sqm	74 sqm private garden	9 sqm



Figure 1 – Overhead view of proposed residential development. This demonstrates how the new development will sit comfortably within the existing site and assimilate successfully with the hotel.



Figure 2 – CGI of proposed residential development from Hever Court Road facing south east. This image demonstrates how the proposed scheme will be well screened from the roadside.

6 PLANNING POLICY

6.1 This section provides a review of relevant national and local planning policy and guidance.

NATIONAL POLICY

6.2 The National Planning Policy Framework (NPPF) was revised in July 2021 and sets out the Government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development.

6.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

6.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework.

6.6 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Delivering a Sufficient Supply of Homes

6.7 Paragraph 60 explains that in order to support the Government's commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

6.8 Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where strategic policies are more than five years old. The five year supply should include an appropriate buffer. Where the local authority chooses to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan the buffer should be 10% to account for any fluctuations in the market during that year. In the event that there has been significant under delivery when measures against the Housing Delivery Test (November 2018 onwards) then a 20% buffer should be applied.

6.9 The NPPF is clear at paragraph 11 that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five

year supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.

Promoting Sustainable Transport

- 6.10 To protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities; address the needs of people with disabilities by all modes of transport; create safe and secure places minimising conflicts between traffic and pedestrians; allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Making Effective Use of Land

- 6.11 The NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 6.12 Paragraph 120 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs. Furthermore, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 6.13 Sub Section (e) of paragraph 120 outlines that Council's should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.
- 6.14 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 124 sets out that the planning system should support development that makes efficient use of land, taking into account the following:
- 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 or of promoting regeneration and change; and
 - e) The importance of securing well-designed, attractive and healthy places

Achieving Well Designed Places

6.15 This chapter sets out at paragraph 130 that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture and appropriate landscaping;
- Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks, and
- Create places that are safe, inclusive and accessible and which promote health and well-being.

Decision Taking

6.16 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

DEVELOPMENT PLAN

6.17 The Development Plan comprises the Core Strategy (adopted in 2014). The Council is in the early stages of preparing its Site Allocations/Development Management Policies Documents, which will ultimately replace the Core Strategy. However, it does not represent a material consideration at this stage.

6.18 Accordingly, the Core Strategy sets out the detailed policies for consideration of planning applications within the borough. The policies relevant to the assessment of the development proposal are summarised below.

6.19 **Policy CS01 (Sustainable Development)** states that planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

6.20 When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

6.21 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - Specific policies in that Framework indicate that development should be restricted.
- 6.22 **Policy CS02 (Scale and Distribution of Development)** states that the Council's development strategy for the Borough primarily seeks to retain and improve the existing stock of housing. The strategy prioritises the redevelopment of previously developed land within the urban area.
- 6.23 **Policy CS11 (Transport)** advises that new developments should mitigate their impact upon the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.
- 6.24 Sufficient parking should be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 6.25 **Policy CS14 (Housing Type and Size)** outlines that the Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties. 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.
- 6.26 **Policy CS15 (Housing Density)** States that sites will be developed at a variety of densities depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site.
- 6.27 All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is located. Within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport hubs of Gravesend Town Centre and Ebbsfleet, higher densities will be sought.
- 6.28 **Policy CS19 (Development and Design Principles)** advises that new development should be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti- crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:
- The design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;
 - New development will be located, designed and constructed to:
 - safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
 - avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and

- not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
- The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
- New development will be designed in an inclusive way to be accessible to all members of the community;
- New development will provide appropriate levels of private and public amenity space;
- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- Car parking will be well related to the development it serves;
- New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste; and
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

Supplementary Planning Guidance

- 6.29 In February 1996, the Council introduced Supplementary Planning Guidance 2 to inform the layout and design of new residential development within the borough. The document was updated in 2020 and forms a material consideration in the assessment of residential planning applications.

7 PLANNING CONSIDERATIONS

- 7.1 The planning issues relevant to the determination of the development proposal are assessed in detail below.

Principle of Development

- 7.2 As examined within the previous section, the National Planning Policy Framework (NPPF) requires the Council to make the most efficient use of land by maximising the use of previously developed sites.
- 7.3 The site comprises an underutilised overspill car parking area relating to the Best Western Manor Hotel, which forms part of the settlement boundary and urban area of Gravesend. As outlined within the Transport Statement, the area surrounding the site is accessible by active modes of travel (walking and cycling), with a good provision of footways and crossing facilities. The site is accessible by public transport, with bus stops in close proximity and services that link the site with Gravesend Town Centre and its railway station.
- 7.4 The existing open car park site does not make a positive contribution towards the varied visual character of the wider local area. As such, the site offers an opportunity for redevelopment to result in a more efficient and beneficial use. The scheme will bring forward a range of new residential accommodation (including family sized dwellings) that will make a positive contribution toward the borough's housing requirements and provide living opportunities for members of the local community.
- 7.5 This is particularly pertinent when considered in the context of the Council's inability to demonstrate a Five Year Housing Land Supply (FYHLS) as acknowledged in the Five Year Housing Land Supply Statement 2022 – 2027 which was published in March. Accordingly, the "tilted balance" as set out in paragraph 11 of the NPPF is engaged.
- 7.6 In this instance, the policies which are most important for determining the application are considered out-of-date and the Council should therefore grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole.
- 7.7 Accordingly, the principle of new residential development is considered acceptable at this location in accordance with the NPPF, and Policies CS01 and CS02 of the Core Strategy, provided that relevant design and living environment criteria, refuse, biodiversity and parking standards are all adhered to.
- 7.8 It is important to consider that the proposed development will help to enable the hotel to evolve to meet modern requirements and help preserve its long term viability (as explained within Section 2) together with all existing employment roles for the benefit of the local community in accordance with Policy CS07.

Design

- 7.9 The considered approach to scheme design is outlined in Section 5 and presented within the accompanying Design and Access Statement.

- 7.10 The site is not located within a Conservation Area, albeit careful consideration has been afforded to ensure that all elements of the proposal respond positively to local distinctiveness and sit comfortably in terms of visual appearance and massing, whilst delivering a high quality contemporary design.
- 7.11 The scheme has been arranged in an efficient manner that will ensure the full potential of this previously developed accessible site is realised. The layout has been carefully considered taking the site's constraints and surroundings into account. The development also reflects the scale, density and character of the wider suburban residential neighbourhood.
- 7.12 The proposal represents a contemporary reinterpretation of the typical terraced dwellings within the streetscene to the north of Hever Court Road (a large number of which are separated into blocks comprising 4 or more dwellings). The proposed scheme seeks to incorporate many of the positive features of those houses.
- 7.13 As demonstrated on the plans which form part of this application submission, the site has been laid out as three individual blocks of four dwellings (Blocks A, B and C). This approach helps to break up the massing of the development into small blocks to reflect the general pattern of development within the wider area.
- 7.14 Private rear gardens are provided for occupiers of each dwelling as well as separate winter gardens and every opportunity has been taken to maximise soft landscaping and planting throughout the site.
- 7.15 The massing of the proposed houses within Blocks A and B extend vertically to two storeys to reflect the general height of structures in the locality and pitched roofs are incorporated to reflect the form and character of the surrounding houses.
- 7.16 The houses within Block C will extend to a similar height but will incorporate an additional bedroom within the roofspace. The rear elevations of these houses will incorporate contemporary dormers to provide views over the landscaped eastern apex of the site.
- 7.17 This approach ensures that the overall footprint of the proposed development will be minimised to create an efficient plan and layout.
- 7.18 Defensible landscaped space to the front elevations of the proposed houses at ground floor will ensure privacy between the units and mark the entrances to the houses. At first floor, additional bays are introduced which enable the creation of covered entrances and further fragment the overall forms of the dwellings. The bays are angled so that the views from the front elevation bedroom windows in Block C are directed away from the rear gardens of the houses within Block B to mitigate the potential for any overlooking impact as explored in further detail below.
- 7.19 The scheme proposes a simple palette of materials, namely facing brickwork, slates and zinc clad dormers. These materials are more durable than render and will help create a high quality, contemporary development as shown in the CGIs overleaf.
- 7.20 Accordingly, the scheme complies with all relevant design related criteria (as outlined within Policy CS19).



Figure 3 – CGI of proposed scheme with front elevation of Block A in foreground). This image demonstrates how the design and form of the proposed development has been informed by an assessment of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the wider area.

Impact

- 7.21 The nature and position of the site means that there is extremely limited potential for any adverse overlooking or overbearing impacts in relation to existing neighbouring dwellings to the north of Hever Court Road or any conflicts with the hotel itself.
- 7.22 Whilst habitable room windows will be positioned within the northern facing front elevations of Blocks A and B, sizeable separation distances of at least 40 metres will be maintained to the closest facing windows on the front elevations of houses off Kilndown and Miskin Way.
- 7.23 This separation distance (re-enforced by Hever Court Road and the soft landscaping that will be maintained along the northern boundary of the site) is sufficient to mitigate the potential for any adverse overlooking or overbearing impacts.
- 7.24 Furthermore, a distance of over 25 metres will be maintained between the closest facing side elevation of Block A and the front elevation of the hotel which ensures that the two elements will sit harmoniously with each other.
- 7.25 Accordingly, the proposed development will result in no unacceptable adverse impacts upon amenity in line with the requirements of Policy CS19.

Residential Living Environment

Internal Space Standards

- 7.26 All internal rooms will comfortably exceed targets set out within the National Space Standards. Provision will also be made within the site for secure cycle accommodation and refuse storage as explored in further detail in the subsequent section.

Private Amenity Space

- 7.27 The scheme has been carefully designed to ensure that private gardens will be provided for new residents which respond positively to relevant target standards (please refer to the accommodation schedule set out at Section 5).
- 7.28 Each new house will be served by private and useable rear gardens which range in size from a minimum of 43 sqm (for the proposed 2 bed dwellings) up to 60 sqm (for the 3 bed properties). This ensures that the Council's targets of 37.2 sqm (for a 2 bed house) and 60 sqm (for a 3 bed house) as set out within the Residential Design Layout SPG are adhered to which will allow for provision of adequate outside storage, leisure use, clothes drying and play space.
- 7.29 Furthermore, it is also important to note that each of the proposed dwellings incorporates a winter garden (not included within the amenity space calculations above) extending to 9 sqm. Enclosing amenity space as a glazed, ventilated winter garden provides an alternative form of private amenity provision for occupiers dwellings that will be sheltered and unaffected by noise from the surrounding environment.
- 7.30 Please refer to the images of comparable winter gardens from other residential developments below which help to demonstrate how these spaces can make a valuable contribution to the quality and usability of private amenity space.



Figure 4 – Example of Winter Garden



Figure 5 – Example of Winter Garden

Shared Amenity Provision

- 7.31 The site is positioned closely to Mackenzie Way Park (approximately 150 metres to the east) and Hever Farm Recreation Area (350 metres to the north west). This means that all residents will benefit from easy access to large landscaped parkland and amenity space.

Outlook/Sunlight & Daylight

- 7.32 The scheme has been carefully designed to maximise opportunities for glazing within the front and rear elevations. Each dwelling will be served by several carefully positioned windows, meaning that residents will benefit from good levels of sunlight/daylight and high quality dual residential outlook.
- 7.33 The drawings package shows how the large expanses of glazing (particularly at ground, first and second floor level within the rear elevations) will maximise sunlight/daylight and help to create light, bright family homes.

Privacy

- 7.34 At ground floor, it is acknowledged that the residents will gain access to their properties by walking along the footpath positioned to the front of Houses 1-8. To ensure that acceptable privacy is maintained for occupiers of these dwellings at ground floor, sufficient space has been retained for defensible planting extending to at least 2 metres depth in front of ground floor kitchen windows.
- 7.35 Our view is that a defensible planting buffer of this width will ensure that occupiers benefit from acceptable levels of privacy.

7.36 On the front elevations at first floor level, bays are introduced which enable the creation of covered entrances and further fragment the overall forms of the dwellings. The bays are angled so that the views from the front elevation bedroom windows in Block C are directed away from the rear gardens of the houses within Block B to mitigate the potential for any overlooking impact.

7.37 All separation distances enshrined within the Residential Layout SPG (at paras 17 and 18) are adhered to.

Accessibility

7.38 Each new dwelling has been designed to accord with the M4(2) requirements to ensure appropriate accessibility for all. Further details can be provided by condition, as necessary.

Air Quality

7.39 The application submission is supported by an Air Quality Assessment which demonstrates that there are no adverse impacts arising from the proposed development for future residents or occupiers of neighbouring properties.

7.40 This directly addresses one of the fundamental concerns raised by the Council in assessing the previously proposed residential scheme at pre-application stage in 2019.

Noise

7.41 In a similar manner, the applicant has instructed a noise assessment in support of the planning application to address concerns raised by the Council at pre-application stage regarding noise from the A2 positioned to the south of the site.

7.42 The report concludes that external noise levels exceed the AVO Guides 'Rarely Open' criteria which means that windows cannot be used for the primary means of ventilation and an alternate ventilation strategy is required which is capable of a higher rate of ventilation.

7.43 Accordingly, a mechanical extract ventilation system should be installed to provide 'Whole Dwelling Ventilation' in accordance with Approved Document F. It is understood that continuous MEV extract fans installed in accordance with the specified trickle ventilators to allow the ingress of fresh air will be adequate and full details can be provided via condition should the Council be happy to recommend the application for approval.

7.44 External noise levels relating to the rear gardens will exceed target standards. Irrespective of noise levels, the gardens will remain fully useable for landscaping, storage and clothes drying, etc. The site also provides easy access to two local parks which are positioned further to the north away from the A2 and not impacted by noise.

7.45 It is also important to note that the noise report confirms the proposed winter gardens will not be affected by external noise sources, thereby providing a valuable contribution to the quality and usability of private amenity space for each proposed dwelling.

7.46 In summary, the scheme has clearly been informed by the comments received from the Council during pre-application consultation and will provide acceptable living conditions (in regard to internal layout,

room sizes, outlook and sunlight/daylight, private and communal amenity space, privacy, accessibility, noise and air quality) in line with Policy CS19 and the Residential Design Layout SPG.

Housing Mix

- 7.47 The proposed development will provide a net additional twelve dwellings (8 x 2 bed and 4 x 3 bed). This responds positively to Policy CS14 which seeks to ensure that new housing development provides a range of dwelling types and sizes taking into account the existing character of the area.

Highways

- 7.48 As explained in Section 5, the owners of the hotel are seeking to develop the underutilised overspill car parking area within the eastern element of the wider site (as well as part of the existing hotel car park) for a new residential development (comprising 12 houses) with associated parking and amenity space.
- 7.49 As a result of this scheme, the total car parking spaces that currently serve the hotel will reduce from 100 to 20 which reflects the current oversupply in provision and the proposed reduction in the number of hotel rooms.
- 7.50 The application is supported by a Transport Statement which demonstrates that the amount of car parking provision retained for the reconfigured hotel is acceptable and will ensure no adverse impacts upon highways safety.
- 7.51 The Transport Statement also confirms that a total of 24 car parking spaces will be provided to serve the 12 proposed homes, including a single disabled space (which equates to 100% of the Council's parking standards). In addition, a motorcycle parking space will also be provided.
- 7.52 A total of 32 cycle spaces will be incorporated within the site layout. Four of the two bedroom dwellings are provided with cycle storage for two cycles within the curtilage of the plots and the three-bedroom dwellings each contain storage for three cycles. A separate external store is provided for the remaining units that will accommodate 12 cycles. The provision accords with Kent County Council's standards, which require a minimum of one space per bedroom.
- 7.53 The proposed reconfigured vehicular access junction will form a shared access arrangement for the hotel and the residential elements of the site. The residential dwellings will be accessed internally from the hotel car park and swept path analysis for a large refuse vehicle accessing and egressing the proposed residential development is included within the Transport Statement. This demonstrates how the operatives will be able to comfortably access the refuse collection area adjacent to the main cycle store.
- 7.54 Footway improvements at the main site junction on Hever Court Road will facilitate pedestrian access at the east side of the entrance and road markings will delineate a route for pedestrians into the residential site as on-carriageway provision to the rear of the row of parking bays adjacent to Hever Court Road.
- 7.55 In view of the low level of vehicle activity and the low-speed nature of the internal site layout, this access arrangement is considered to be appropriate for pedestrians with a minimal risk in terms of

safety conflict. To the east of the first turning head within the residential development site there is also footway provision to the south of the internal access road along the frontage of dwellings 1 to 8.

- 6.56 Accordingly, the scheme will comply with Policies CS11 and CS19 in ensuring that an acceptable amount of car parking will be retained for the hotel. There will be no adverse impact upon its operational requirements.
- 6.57 Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Against this background, we do not consider that there is any reason to refuse the scheme on highways grounds.

Drainage

- 6.58 A Flood Risk and Surface Water Drainage Assessment forms part of the planning application submission.
- 6.59 The report concludes that surface water runoff generated by newly introduced impermeable areas at the development will be conveyed and stored within 735m² of permeable paving located beneath the access road and parking bays. Precipitation which lands on these areas will percolate through the paving surface and be stored within the gravel/geocellular storage sub-base. From the sub-base any stored water will be gradually discharged to ground.
- 6.60 Surface water runoff generated by the remaining impermeable surfacing comprising 707m² of roof areas and 358m² of external paving, will be directed towards the permeable paving sub-base via linear drains and subterranean pipework.
- 6.61 The SuDS system has been designed to accommodate all surface water runoff generated by post development impermeable surfacing during the 1 in 100yr plus (40%) Climate Change event. As such, the SuDS system also has capacity to accommodate all runoff generated by the 1 in 30yr plus (35%) Climate Change rainfall event with no exceedance.
- 6.62 In addition to the permeable paving, there is the potential to incorporate raingardens within the proposals (considered an optional addition in this strategy). Should raingardens be included within the final design proposals the overall SuDS schemes will provide an attenuation storage capacity greater than what is required by policy and thereby accords with Policy CS19.

Ecology

- 6.63 The application submission includes a Preliminary Ecology Appraisal of the site prepared by ArbTech. This report concludes that the site has no potential to support any protected notable species and no further surveys are therefore required.
- 6.64 The report outlines recommendations for how the proposed development can achieve biodiversity enhancements, including the provision of bat and bird nesting boxes.

Sustainability

- 6.65 The Sustainability Statement submitted in support of the application concludes that the proposed residential scheme will deliver a highly energy efficient and sustainable development which accords with the guidance provided within Gravesham Council's adopted planning policies (most notably Policy CS19).

8 CONCLUSIONS

8.1 It is concluded that the scheme is in accordance with the NPPF as well as the Council's Core Strategy. It constitutes appropriate development and should be supported for the following reasons:

- The principle of creating new residential dwellings on a previously developed site within the urban area, is supported by national and local policy. The proposed scheme will provide much needed new housing for the local community (including family sized accommodation) whilst enabling an efficient, effective use of the site. This is particularly pertinent when considered in the context of the Council's inability to demonstrate a Five Year Housing Land Supply;
- The application submission proposes a high quality, contemporary design solution that has been informed by the site's constraints and the surrounding area. It will help the site to contribute in a more positive manner to the visual character of the streetscene;
- The carefully considered layout and massing of the scheme ensures there will be no unacceptable adverse impact upon the amenity of occupiers of any existing neighbouring properties;
- The proposed accommodation is fully acceptable and of a high standard. Each new house will exceed internal space standards, and private, useable amenity space will be provided for the benefit of all occupiers;
- Every opportunity has been taken to maximise soft landscaping and tree planting within the site to enable a net gain in biodiversity to be achieved. The drawings package demonstrates how this has been taken into account in informing the proposed layout of the scheme;
- The proposed access, refuse and vehicle/cycle parking provision has been demonstrated to be acceptable; and
- The application submission is supported by a comprehensive range of specialist consultant reports including a Design & Access Statement, Transport Statement, Surface Water Drainage Strategy, Preliminary Ecological Appraisal, Air Quality and Noise Assessments. These submissions conclude that the proposed scheme is acceptable in regard to key relevant planning, design, landscape, amenity and highways issues.

8.2 Overall, the scheme adopts the principles of sustainable development in relation to social, economic and environmental factors. This is because it recycles urban land and delivers a mix of residential dwellings which are accessible by a choice of travel modes including foot, cycle and public transport. The proposals thereby accord with the emphasis of national policy (set out within the NPPF), which confirms a presumption in favour of sustainable development.

8.3 The Council should therefore grant permission for the proposed development given that there would be no adverse impacts which would significantly and demonstrably outweigh the clear benefits that the scheme will provide. The application thereby accords with the NPPF and Policies CS 10, 02, 11, 14, 15 and 19 of the Core Strategy as well as the Residential Layout SPG.

Appendix 1

Delegated Report

Application No:	20200105
Location:	Land Adjacent To Manor Hotel Hever Court Road Gravesend Kent
Description:	**RECONSULTATION** Redevelopment of existing overspill car parking area situated to the east of existing hotel to provide a B8 storage facility
Applicant:	Mr M Rossi
Site Visit Date:	10 March 2020

Submitted Documents/Plans

The application comprises the following documents and plans:

Application for planning permission form;
 Red/blue line site boundary plan;
 Drawing no. 19-1354-30 Existing block plan;
 Drawing no. 19-1354-31C Proposed block plan;
 Drawing no. 19-1359-32 Proposed ground and first floor layouts;
 Drawing no. 19-1359-33 Proposed second and third floor layouts;
 Drawing no. 19-1359-34 Proposed roof layout, elevations and section;
 Drawing no. 19-1359-35 Proposed elevations;
 Drawing no. 200204S Proposed ground and first floor layouts and section;
 Drawing no. 200204S Proposed second and third floor layouts;
 Planning and Design Statement January 2020;
 Transport Statement January 2020;
 Transport Addendum Note March 2020;
 Drawing no. VN201615-D100 Rev. A Proposed alternative pedestrian access;
 Email from agent dated 09 March 2020 responding to case officer queries;
 Email from agent dated 09 April 2020 responding to GBC Highway Development Management Officer comments; and
 Email from the agent dated 04 May 2020 regarding pedestrian access.

Relevant Planning History

<u>Application No.</u>	<u>Description</u>	<u>Status</u>	<u>Decision</u>
20200104	**RECONSULTATION** Minor external alterations to existing hotel including reduction in car parking area.	PCO	
20100854	Erection of part single storey, part 2/3/4 storey extension on eastern	PER	10.12.2010

elevation to provide additional guest accommodation on first, second and third floors with coffee/games room, dining room, tv room, kitchen, lobby, wc accommodation and reception on ground floor with a link above functions room to additional rooms.

20090027	Partial demolition and erection of part four, part three, part two and single storey extensions to provide additional guest rooms (to make a total of 89 rooms), kitchen, brasserie, cafe/bar and offices with associated alterations.	PER	26.02.2009
20080423	Partial demolition and erection of part two store, part three storey extension to form 22 guest rooms, kitchen, cellar, bar, function room entrance hall, maintenance room, staff car parking and canvas entrance canopy with associated alterations.	PER	01.07.2008
20000809	Erection of two storey extension on the north elevation facing Hever Court Road to form eight additional guest rooms, demolition of the existing single storey buildings and erection of a single storey extension to form six additional guest rooms, enlarged restaurant and linen/garden stores incorporating the provision of new garden/courtyard on the south elevation facing A2; and alterations to the east elevation.	PER	11.01.2001

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS09 – Culture and Tourism
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards

- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network

Other material considerations

National Planning Policy Framework (February 2019)

- Section 2 – Achieving sustainable development
- Section 6 – Building a strong, competitive economy
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG2 - Residential Layout Guidelines (1996)
- SPG 4 - KCC Parking Standards (2006)

Other documents

- Gravesham Landscape Character Assessment (2009)
- PGN 6 – Planning Guidance Note 6 Vehicle accesses on Classified Highways

Consultations, Publicity and Representations

GBC Regulatory Services

Initial response:

The nearest residential properties are located approx. 30 to 40 meters north of the site, on the other side of Hever Court Road.

It is important that the use of the development does not adversely affect occupiers of these dwellings in terms of noise arising from the proposed use or artificial lighting (including from illuminated signage) associated with it.

No details have been provided in relation to such matters as:

- Opening hours
- Noisy operations or details of how the site will function and mitigate noise arising from its use, e.g. from customer and works vehicles, loading and unloading of goods, trolleys, intercoms, etc.
- Lighting, including from any illuminate signage

Such information is required alongside details of the likely impacts on the existing residential dwellings, in order for this Service to provide a more informed view/set of comments.

Second response:

Given the proposed opening hours on the email you refer to, I have no concerns about noise provided these hours are conditioned please.

With regard to lighting, my concern is about introducing an large illuminated sign and any additional lighting facing the dwellings (most likely their bedrooms) on the other side of Manor Road.

The issue with applying a technical condition that needs to be met before bringing it into use from my perspective is that it will already have been designed, purchased and installed by then. It could be that it is such low level that it won't be a problem, but I would rather know this information before commencement rather than before use for this reason to save them from a potentially

expensive headache and delay later down the line. I appreciate however that this may not be agreed/possible.

So, I have no objections but would like to see the hours of use, and ideally also the hours of illumination on the side facing Hever Court Road, conditioned if possible please.

If the hours of illumination of the sign facing residential will not be suitably limited and conditioned, we would ask for a scheme detailing the proposed lighting, and specifically the illuminated signage, to be provided and approved prior to commencement of the development. The lighting scheme shall include a suitable report detailing and explaining the lighting impact of the scheme on nearby light sensitive properties and confirm compliance with The Institution of Lighting Professionals (ILP) Guidance Notes (01/20) for the Reduction of Obtrusive Light.

GBC Planning Policy Manager

No comments.

GBC Highway Development Management Officer

This application appears to be a duplicate of application 20200104 and so the same comments apply.

This application is complex and whilst some pre-application advice has been sought, it does not relate to the current proposal.

The traffic generation and parking figures supplied are inadequate as it only refers to a single Friday, when demand may be at its lowest as there is liable to be little business traffic and the hotel is not well located for tourists. Nor does it allow for major users of the function accommodation, which would potentially favour weekends. Kent Highways have identified they will accept a TRICS analysis which would seem appropriate.

In terms of the hotel alterations and associated car park reduction, these are acceptable and comply with guidance but would have to be completed prior to the commencement of any other development on site. All facilities would have to be restricted to the use of people staying at the hotel, so no additional parking demand is created.

It is noted that Kent Highways require provision for coach parking, which I agree with, but generally it should be possible to accommodate this with careful management of the car park to provide for a coach party staying at the hotel when car parking demand should be reduced. A suitable management plan should be in place prior to the alterations taking place. Currently the only option would be for the coach to use the overspill car park.

Given the future requirement for the country to be carbon neutral and all fossil fuelled cars ceasing to be sold from 2035 at the latest, all parking spaces within the hotel car park should be wired to accommodate a minimum continuous supply of 7kW per space. It is recommended that 20% of spaces should also have the infrastructure installed to permit on site charging now.

Kent Highways has correctly identified that the self-storage facility could generate vehicles with trailers, but the proposal makes no provision to cater for these. As it is proposed they would have to occupy two spaces within the hotel car park.

It is noted that the pedestrian access to the hotel will remain, but this is not well suited to serve the self-storage unit, this would be better served by having its own direct access that does not take it through a car park and a shared pedestrian/vehicle gate. It is accepted that this would require alterations to the highway but should increase safety within the site. There appears to be sufficient

verge width to provide a suitable adoptable highway footway on the south side of Hever Court Road.

As it currently stands the developer should review the information submitted to ensure it is robust and in particular consider vehicle with trailer parking for the self-storage unit.

Second response:

I note Highways England concern about the potential use of the site as a parcel distribution facility which would have a significant distortion of the traffic generation from the site. It is therefore essential that parcel distribution is prohibited at this site in whole or part. Providing the storage is suitably restricted to domestic and business use that does not include parcel distribution, I have no objections.

Third response:

Looking at the drawing it would be better for a direct link to Hever Court Road, with the footway extended along the verge if necessary rather than make people walk out into the edge of a large car park area just to gain access to a pedestrian gate. It's a simple modification on what they are proposing and so can easily be dealt with by condition.

Agree wholeheartedly with the imposition of conditions to control the timing of the works to protect highway safety interests.

Highways England

Initial response:

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the A2 (west) in the vicinity of Hever Court Road/ Watling Street.

We have assessed the applications and their supporting documents. While we acknowledge that the applications are separate and capable of being determined separately, they are also closely linked in transport terms. As a result, Highways England request the following information is provided:

1. An assessment of the number of trips for both existing and proposed hotel use using TRICS. The applicant provided information on trip generation based upon a one day survey, which Highways England does not consider to be a robust assessment upon which to compare the existing the proposed trip generation of this proposal.
2. An assessment of the number of trips for both existing and proposed B8 use using TRICS. Unless the applicant is seeking or wishes to accept a condition to restrict the use within B8, any assessment should be based on a "worst case scenario" ie parcel distribution style B8 use.
3. A likely trip distribution for all proposed uses. This is because the A2/Hever Court Road/Watling Street junction shows signs of operating over capacity with queuing existing on the mainline carriageway.

The applicant should formally set out the above information in a revised Transport Statement to fully address impacts to the SRN.

We look forward to receiving the required information in due course.

In the meantime we consider that the applications have yet to demonstrate that they will not materially affect the safety, reliability and/or operation of the strategic road network. They are therefore assumed not to accord with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Consequently, the local planning authority should not determine the applications, other than a refusal. If the authority wishes to permit the applications or they go to appeal, please contact us and we will provide our formal responses as they stand at that point in time.

Second response:

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the A2 (west) in the vicinity of Hever Court Road/Watling Street.

In our original response, dated 23 March, we raised concerns around

- trip generation,
- the extent and categorisation of the B8 usage and
- trip distribution.

The applicant's Transport Consultant, Vectos, has provided a Transport Assessment Addendum (VN201615, Dated March 2020) which addressed some concerns raised by Kent County Council that mirrored Highways England's own initial concerns.

Having reviewed the above addendum, Highways England has no further comments to make in regards to

- trip generation or
- the B8 usage, as the applicant is willing to agree to a condition confirming self-storage usage only.

Vectos has not fully addressed the issue of the trip distribution – preferring to indicate that the trip generation numbers associated with hotel are likely to be in the region of 8 AM peak hour two-way trips and 7 PM peak hour two-way trips. While the B8 usage is likely to generate 14 trips in the AM peak period and around 18 vehicles in the 12-13pm (interpeak period). The likely net trips onto the highway network is approximately 18 AM peak hour trips and 17 PM peak hour trips for both uses.

While the applicant has declined to provide further evidence as to trip distribution onto the network, even at a 50% split in East/West leaving the site – 9AM and 9PM (rounding up) trips would not cause a significant impact upon the SRN or at the A2/Hever Road/Watling St Junction. While the existing junction is operating at higher than normal levels due to existing traffic, Highway England would not consider the additional net trips onto the network at this particular junction to be more than could occur with natural daily fluctuations. Consequently, in this particular case, we are content to accept that the proposals would not be likely to have a detrimental effect upon the safety, reliability and/or operation of the strategic road network. They are therefore assumed to accord with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Please find attached Highways England HEPR Form recommendation and planning condition wording recommended to be attached to the above applications (we are content for the council to use alternative wording to the same effect if it so chooses). Should you have any queries regarding our response, please do not hesitate to contact us and please forward our comments to the applicant who can contact Highways England at PlanningSE@highwaysengland.co.uk.

Highways England recommends the following planning condition is included within any planning permission granted:

1) The B8 (Storage and Distribution) usage shall be specifically restricted to self-storage. Any alteration from the above land use category will require the submission of a new planning application and transport assessment to be agreed in writing by the Local Planning Authority and Highways England.

Reason: In order to ensure the safe and reliable operation of the Strategic Road Network in compliance with national planning and transport policy set out in DfT Circular 02/2013 (particularly paragraphs 9 & 10), and MHCLG NPPF (particularly paragraph 109).

Kent Highway Services

Initial response:

Thank you for your consultation in relation to the above planning applications. I have looked at both applications for the reconfiguration of the hotel and redevelopment of the adjacent land together.

The site is located approximately 2/5 miles from Gravesend town centre, and the A2 is accessed via a double roundabout layout approximately 400 metres east of the site. Hever Court Road is subject to a 40 mph speed limit and has double yellow lines parking controls in the vicinity of the site.

The proposal seeks to reconfigure the existing hotel which currently comprises 64 hotel rooms, business / function rooms, and an ancillary restaurant, to provide 34 hotel rooms, reduced conference facilities, and a guest gym and restaurant. The parking spaces are proposed to be reduced from 78 to 39, with a new B8 self storage 4,190 sqm unit on the overflow and eastern section of the site. Access is currently via a separate entry and exit barrier operated priority controlled junction.

An ATC was carried out on Thursday 20 June 2019, and identified that westbound traffic flows are higher. During the AM peak the highest volume of 455 for eastbound traffic is recorded at 0800-0900, and 529 for westbound traffic is recorded at 0700-0800. During the PM peak (1700-1800), vehicles peak at 341 for eastbound and 411 for westbound traffic.

PIC accident data has been interrogated, where there have been a number of accidents in the vicinity of the site. However, it is considered that the records do not suggest that there are any prevailing road safety issues.

The site is accessible by walking and cycling and alternative modes of transport. However, given the location of the site in close proximity to the strategic road network, I would consider that the majority of customers will arrive by private car, or taxi hire from the station.

Development Proposals

The hotel currently provides 78 car parking spaces, with a gravel overspill parking area for approximately 20 parking spaces. The applicant has undertaken a parking survey on Friday 21 June 2019, to assess the car parking occupancy. The survey illustrates that the maximum capacity

is 29 vehicles (including 7 staff) at 21:00. I consider that a more substantial survey period would make the data more robust.

Parking

The above mentioned parking survey has been utilised to establish a figure of 0.45 cars per bedroom. The survey provides a snapshot scenario, and is not considered robust enough. Supplementary Planning Guidance (SPG4) outlines parking standards for hotels at 1 space per bedroom and 1 space per 2 staff. In line with this guidance, it is considered that a provision of 39 spaces is sufficient. SPG4 provides further guidance whereby developments exceeding 20 bedrooms should make suitable provision for coaches, either in the form of a drop off and pick up facility or coach parking contained within the allocated spaces for car parking.

Access

The proposal seeks to change the existing separate entry and exit arrangements to provide a standard priority T-junction, which will provide access to the hotel and the self storage unit. Tracking has been provided to illustrate access and movement for refuse freighters, a large transit and a large private car. It would be reasonable to assume that a number of users would utilise a trailer to move items to and from the site.

I am concerned about conflicts that may arise with pedestrians crossing in close proximity to a number of different vehicles. It would be more beneficial to site a pedestrian access gate closer to the access to the self storage. The two uses will be utilised in different ways, and it does not seem appropriate for pedestrians for the self storage to utilise the hotel access and walk through the car park.

The proposed dropped kerb and tactile paving should be sited where it will be easily manoeuvred by partially sighted and blind individuals. The movement lines should not cause confusion with movement into the main carriageway. The access will be subject to a separate Section 38 Agreement.

Trip Generation

A traffic survey was undertaken at the existing access junction on Friday 21 June 2019, and recorded vehicle trips entering and exiting the site during the AM and PM periods. The peak period saw a maximum of 14 trips. The data from the survey has been utilised to look at the trips for the proposed hotel, which will have fewer rooms. As previously noted, I do not consider this data to be robust and will require a TRICS analysis as a comparison or a larger survey over a number of days.

TRICS has been interrogated to establish the trip rates for the proposed self storage B8 unit. The proposal could generate a maximum of 14 two way trips per hour. The net trips for both the hotel and storage uses provides a maximum of 12 two way trips during the evening peak.

I suggest the following amendments / further information required:

- ☐ Suitable provision should be made for coach parking, either as a drop off pick up facility or contained within the allocated car parking spaces.
- ☐ The pedestrian access gates for the self storage should be moved to remove potential conflicts.
- ☐ TRICS data for hotels of a comparable size and location should be utilised to establish vehicles trips. The survey data provided is not robust.

Second response:

Further to my previous comments dated 4 March 2020, a Transport Addendum Note has been submitted. As with previous comments, this is in relation to both applications for the reconfiguration of the existing hotel and the redevelopment of the overspill carpark to provide B8 self storage units.

Conference facilities have been removed from the proposal. As such I consider that the parking provision proposed is sufficient. While I questioned the robustness of the submitted parking survey, the removal of the conference facility allays concerns regarding the parking provision. As such, I am minded to accept the proposed parking.

As noted above, conference facilities have been removed from the proposal. The applicant deems that a coach parking space would not be deemed necessary given the change in configuration. I suggest a condition requesting a Parking Management Plan identifying how coaches can be accommodated, or a Condition prohibiting their use.

As previously noted, it is reasonable to assume that self storage site will be accessed by vehicles with trailers. The storage facility provides two large spaces adjacent to the building, which can accommodate vans. Trailers are envisaged to be detached at one of these spaces and moved to another parking space.

I maintain that that it would be preferable for dedicated pedestrian access to be provided for the self storage unit. While it is unlikely for any conflicts to occur, I would prefer for any potential to be removed. This would require a simple pedestrian access at the Hever Court Road frontage.

TRICS has been interrogated to establish trip rates for the hotel. It is clear that the reduced hotel function, and the removal of the conference facility would see a reduction in overall trip rates which is acceptable.

In line with the above I confirm that I am satisfied that the queries have been answered and raise no objection on behalf of the highway authority. I suggest the following conditions:

The prohibition of coaches utilising the site, or the submission of a Parking Management Plan prior to

Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

Completion and maintenance of the access shown on the submitted plans prior to the use of the site commencing.

Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.

All Electric Vehicle chargers provided for homeowners in residential developments must be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>

INFORMATIVE: It is the responsibility of the applicant to ensure, before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like

roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Third response:

Further to my previous response dated 22 April, I note that an updated plan 'General Arrangement of Site Layout and Access Proposals' has been submitted outlining a new pedestrian gate for the self storage unit. The proposed gate means that pedestrians would take a route behind the motorcycle parking bays to a further gate to enter the self storage unit. I am unsure as to why a single gate cannot be provided accessing directly into the unit. However, the solution provided is more satisfactory and reduces any potential of conflicts occurring.

With regard to the pre-commencement conditions, I am minded to suggest that the parking and access conditions are applied prior to first occupation.

The submission of a Parking Management Plan prior to the use of the site commencing.

Provision and permanent retention of the cycle parking facilities shown on the submitted plans prior to the first occupation and shall be permanently retained thereafter.

Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the first occupation and shall be permanently retained thereafter.

The revised access arrangements, including pedestrian access, shall be provided in accordance with the approved plans prior to the first occupation, and shall be permanently retained thereafter.

Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

NB the advice set out in the four final paragraphs of the Second response is repeated.

Health and Safety Executive

HSE's Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.

Kent County Council Heritage Conservation

Thank you for your letter consulting us on the above planning application for the redevelopment of existing overspill car parking area situated to the east of existing hotel to provide a B8 storage facility.

The application site lies within an area of archaeological interest with evidence for human activity

from prehistoric periods to the present day. The site lies adjacent to the line of the Roman Watling Street with the potential for below ground archaeological remains associated with the road and adjacent activity of Romano-British and subsequent date.

I recommend the following condition is placed on any forthcoming consent:

AR5 No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of

- i. archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and
- ii. following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

Environment Agency

Please can you check what the foul drainage details are for this application. It says unknown on the application form.

No response has been received from the following consultees:

Natural England
Thames Estuary Partnership
Thames Defence Heritage
National Grid
West Kent Public Rights of Way
GBC Economic Development Manager

Neighbouring properties

The application was publicised by a site notice and to 17 neighbouring properties by letter. No representations have been received.

It should be noted that although the site notice refers to the development affecting a Public Right of Way (PROW), the case officer specifically checked the location of the PROW. It is located to the south of the application site and no proposed works would directly affect it. Therefore there is no statutory requirement to publicise the proposed development in a local newspaper.

Analysis

This application is one of two that have been submitted involving proposed developments at The Manor Hotel, Singlewell Road (references 20200104 and 20200105). Planning application reference 20200104 relates to external and internal alterations to the existing hotel, including a reduction in the size of the car parking area and the number of bedrooms, which the applicant states would be facilitated by the development proposed in this application.

In this application, planning permission is sought for the erection of a four storey building (between 10.2 and 13.1 metres in height) with a footprint of some 1085 square metres, to be used for self storage. Pedestrian and vehicle access would be provided via an amended entrance to the hotel and via the hotel car park. Parking would be provided for 10 vehicles within the application site (8

car spaces and 2 commercial vehicle spaces).

Appropriateness of the development in principle

Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 prioritises development in the urban area as a sustainable location and promotes the redevelopment and recycling of underused, derelict and previously developed land. Policy CS07 of the Gravesham Local Plan Core Strategy September 2014 seeks to secure the delivery of 186,490 square metres of gross new employment floorspace in Gravesham. Policy CS09 of the Gravesham Local Plan Core Strategy September 2014 seeks to maximise opportunities for expansion in culture and tourism activity in the Borough and to protect and support improvements to existing cultural and tourist facilities.

The proposed development would create 4190 square metres of floor space to be used as a Class B8 self-storage facility (similar in operation to established nationwide operators such as Big Yellow storage). It would employ 5 full time persons, be located within the urban area and be highly accessible by local roads and the A2 Trunk Road. The applicant has indicated that the proposal would facilitate the upgrading and re-configuration of The Manor Hotel, which would be a positive feature of the proposal. As such, the proposal would be in line with Policies CS02, CS07 and CS09 of the Gravesham Local Plan Core Strategy September 2014 and be acceptable in principle.

As the applicant has indicated that the proposed works to the hotel would be facilitated by the proposed development and because the proposed storage facility would result in the loss of existing car parking for the hotel, both applications are intrinsically linked. As such, the following discussion has been written with this in mind.

The following paragraphs consider the proposed development in detail and make an assessment of the specific impacts of the proposal.

Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires that new development is well designed and respects the character and appearance of surrounding area.

The southern edge of the application site is located in the Gravesend Southern Fringe Landscape Character Area and as such, Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications. In relation to the Gravesend Southern Fringe Landscape Character Area, this document states that the overall condition of the landscape is poor and that it has moderate sensitivity. It recommends that a new landscape identity and function should be created and that the fragmented landscape should be restored.

The application site is located in an urban area, close to the A2 trunk road. There are relatively tall residential properties to the north and The Manor Hotel, a large commercial building (some 11 metres tall (at its highest point)) is located to the west. The application site is open land, which is mainly surfaced with gravel and is used as an overflow parking area for the adjacent hotel. Planting and earthen banks on the site boundaries soften the site and screen much of the existing use from public view.

The proposed development would introduce a large building across the majority of the site, which would remove its open nature and along with the proposed car parking area, would completely urbanise its appearance. The building would be commercial in character and due to its height and bulk, would be highly visible in the surrounding area. However due to the proximity of the A2 trunk road, to the size and bulk of the surrounding buildings and to its separation from other built form, it

is considered that the proposed building would not look significantly out of character in this location. A comparison can be drawn with the Travelodge building, located further along the A2, to the west (approved under reference 20110398). That building is taller and more bulky than the building proposed under the current application and it is located in a similar (albeit further back from the A2 trunk road) location.

The detailed design of the proposed development is illustrated below;



The building would be modern in appearance, with illuminated signage and coloured panelling. To ensure that the proposed materials/signage would be appropriate, conditions can be attached to any planning permission granted to require the submission of specific details for approval. Details of hard and soft landscaping, boundary treatments and refuse storage could also be required to be submitted for approval, to ensure that the areas around the building are visually attractive.

Overall it is considered that the proposed development would not be out of character with the surrounding area and would be of appropriate design. As such the proposal would be in line with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy September 2014.

Neighbouring Amenity

The closest residential properties to the application site are nos. 1 to 5 Kilndown and nos. 4 to 12 The Glades. These are located to the north of the application site (the closest of which would be some 28 metres away).

As a new commercial facility, the proposal would have the potential to cause adverse noise/disturbance impacts (from vehicles accessing the site and from the use itself). However it is noted that the surrounding residential properties are a significant distance away and some screening is provided by planting and earthen banks located between the dwellings and the proposed building. Furthermore, due to there not being a significant number of new vehicle movements associated with the proposal and because the surrounding area already has a noisy environment (due to road layout/traffic noise), it is considered that any adverse noise/disturbance impacts would not be so significant as to warrant a refusal of planning permission. Indeed GBC Regulatory Services has raised no objection to the proposal, provided that the hours of operation are suitably controlled.

The proposal would also have the potential to cause adverse lighting impacts (from proposed illuminated signage/other external lighting). In this regard, GBC Regulatory Services has raised no objection to the proposal, provided that details of lighting are submitted and approved.

Due to the distance between the residential properties and the proposed development; to the lack of windows in the design and to the fact that the building steps down (so that the lowest part of the roof would be closest to the dwellings); it is considered that there would be no adverse overlooking, overshadowing or overbearing impacts to surrounding residential occupiers.

Any planning permission granted can be subject to a condition requiring details of the proposed

refuse storage arrangements to be approved, in order to ensure that there are no adverse odour impacts to surrounding residential occupiers.

Overall, subject to the imposition of appropriate planning conditions, it is considered that the proposed development would have no adverse impacts to residential amenity and it would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Parking and Highways

The application site is an overflow car parking area for The Manor Hotel with 23 spaces. The site is accessible by walking, cycling and public transport but due to the proximity to the strategic road network and the nature of the proposed use, the majority of customers would utilise private vehicles (cars and vans).

The proposed development would be undertaken in conjunction with works to re-configure the internal layout and the car parking provision for The Manor Hotel. These works would reduce the demand for car parking and result in revised car parking arrangements, which no longer rely upon the overflow parking at the application site.

Following initial concerns being raised, Highways England does not object to the proposed development, provided that it is conditioned as being used as a self storage facility only. This is because Class B8 uses in general can be significant traffic generators and it is important to ensure that the building is used exactly as proposed (with a lower level of vehicle movements than a general B8 use).

It is noted that the GBC Highway Development Management Officer and Kent Highways do not raise objections, provided that appropriate conditions are attached to any planning permission granted to ensure that the development is constructed and operated without adverse impacts to highway safety (including the submission and approval of details of the alterations to the vehicle and pedestrian access, a parking management plan for the hotel and a construction management plan and to require that the hotel re-configuration works are completed before works to erect the storage building commence).

The proposal would not result in a significant increase in vehicle movements on surrounding roads and would have appropriately designed access and parking arrangements, which would be of sufficient capacity. Furthermore, provided that the hotel parking requirements are reduced prior to the loss of its overflow car park, there would be no adverse parking impacts on the hotel operation. Therefore it is considered that the proposed development would have no adverse impacts on highway safety and it would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1 and P3 of the of the Gravesham Local Plan First Review November 1994.

Groundwater Protection Zone

The application site is located in Groundwater Protection Zone 3. The Environment Agency has requested the provision of foul drainage details before the development commences. Therefore, provided that an appropriately worded planning condition is attached to any planning permission granted, the proposed development would have no adverse impacts to groundwater and it would be in line with Policy CS18 of the Gravesham Local Plan Core Strategy September 2014.

Biodiversity

Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought within new development.

The proposed development would replace an existing overflow car park with a substantial building. Due to the nature of the existing use, the site does not provide a good quality habitat, with the exception of existing planted areas around the site boundaries. Provided that as much as possible of this existing planting is retained, it is considered that there would be no net loss of biodiversity. A landscaping scheme can be required to be submitted and approved to ensure that any opportunities for enhancing habitats at the application site are undertaken. As such, the proposed development would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy September 2014.

Area of Archaeological Potential

The application site is within an area of archaeological interest, with evidence for human activity from prehistoric periods to the present day. As such, Kent County Council Heritage Conservation requires the implementation of an archaeological evaluation. As such, it is considered that, provided a suitable archaeological condition is imposed, there would be no adverse impacts to archaeology and the proposed development would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy September 2014.

Air Quality Management Area (AQMA)

The application site is located in the A2 Trunk Road AQMA. The proposed development would not result in a significant increase in vehicles movements and as such, there would be no adverse air quality impacts and the proposed development would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Gas Pipelines

The application site is located in close proximity to existing gas pipelines (to the north and south). No objection has been raised by the Health and Safety Executive but no response has been received by National Grid. It is noted that no significant groundworks are proposed to be undertaken but due to the proposed amendments to the site entrance, the northern pipelines in particular should be drawn to the attention of the applicant, by way of an informative attached to any planning permission granted.

Public Rights of Way (PROW)

PROW reference NS365 runs to the south of the southern boundary of the application site and would be unaffected by the proposed development.

Other issues

In light of the limited amount of external space at the application site and the need to ensure that any increased capacity or alternative B8 storage use would not cause unacceptable highway safety or residential amenity impacts, it is considered appropriate to remove the permitted development rights available under Parts 3, 4 and 7 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), by appropriately worded planning conditions.

Suggested Conditions

Time limit

Development in accordance with the approved details

No commencement until the works approved under planning permission 2020104 are completed

Approval of Construction Management Plan pre-commencement

Approval of foul drainage strategy pre-commencement
 Approval of external lighting pre-commencement
 Archaeological field evaluation and safeguarding measures pre-commencement
 Approval of vehicle and pedestrian access arrangements prior to first use
 Approval of hard landscaping and boundary treatments prior to first use
 Approval of soft landscaping prior to first use
 Approval of refuse storage prior to first use
 Approval of external facing materials prior to above ground works
 Self storage use only, no other Class B8 uses
 No extension or alteration to the building
 No change of use of the building
 No self-storage use outside of the building
 Hours of operation
 Provision and retention of approved parking spaces

Conclusion

The proposed development would be located in a sustainable urban location, close to the strategic road network and be of appropriate design. It would provide self-storage accommodation, employment opportunities and facilitate the upgrading and improvement of a long standing hotel. There would be no adverse impacts to the character of the surrounding area, highway safety, residential amenity, groundwater, biodiversity, archaeology, air quality or the PROW network.

Recommendation:

Permission subject to conditions.

See draft Decision

Case Officer: Mrs Kelly Joyce	Team Leader: Myles Joyce
Signed: 	Signed:  Service Manager - Development Management
Dated: 10 June 2020	Dated: 11 June 2020

Appendix 2

Tim Cropper

From: Hart, Richard <richard.hart@gravesham.gov.uk>
Sent: 12 March 2019 08:49
To: Tim Cropper
Subject: PRE20180654 - Manor Hotel

Dear Mr Cropper

With regard to your enquiry (Ref: **PRE20180654**) I am providing a formal response which outlines the material planning considerations for redeveloping the site and this response is based on the information you submitted on 21 December 2018 (Proposed Plans, 3D Images and draft planning statement).

Please note the comment in this e-mail only relate to the residential element of your enquiry and a subsequent e-mail will be sent in due course relating to alterations/operation of the hotel.

Site Description

Section 2.1 of your draft planning statement accurately covers the description of the site. However the following site specific constraints apply to the site

- Ground Source Protection Zone 3
- Areas Of Archaeological Potential
- Within 6km of Thames Estuary And Marshes (RAMSAR SPA)
- Lower Thames Crossing - Buffer Safeguarding Zone
- Part of the Site is within the A2 AQMA
- There are a number of Southern Gas Network pipes around the site.
- To the west of the site there is a Grade II listed building

Proposal

From the information submitted you are looking to alter the hotel to reduce the number of rooms down from 64 rooms to 35 rooms to reflect the changes in the UK hotel industry and secondly the construction of 14 three bedroom apartments at the eastern end of the site.

Relevant Planning History

With your supporting planning statement you have adequately covered the relevant planning history and there are no further applications you should be aware for the purposes of your enquiry.

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014;
- Saved policies in the Gravesham Local Plan First Review, November 1994; and
- Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016)

The relevant policies for your proposal are as follows

Gravesham Local Plan Core Strategy (September 2014):

Core Strategy Policy CS01: Sustainable Development
Core Strategy Policy CS02: Scale and Distribution of Development
Core Strategy Policy CS09: Culture and Tourism
Core Strategy Policy CS10: Physical and Social Infrastructure

Core Strategy Policy CS11: Transport
Core Strategy Policy CS12: Green Infrastructure
Core Strategy Policy CS14: Housing Type and Size
Core Strategy Policy CS15: Housing Density
Core Strategy Policy CS18: Climate Change
Core Strategy Policy CS19: Development and Design Principles
Core Strategy Policy CS20: Heritage

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- TC2 – Development Affecting Listed Buildings.

National Planning Policy Framework (2019)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance and other Documents

The Council has adopted a number of Supplementary Planning Guidance documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/home/planning-and-building/supplementary-planning-guidance/supplementary-planning-guidance>

The following documents are relevant to the consideration of this enquiry:

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006)
- GBC Residential Layout Guidelines (SPG2 February 1996)
- Housing Standards Policy Statement 1st October 2015
- Technical Housing Standards - Nationally Described Space Standards

The principle issues for consideration with this pre-application are as follows:

- Principle of Development
- Layout/Design
- Highway issues
- Living conditions for future occupiers
- Impact on amenity of surrounding properties
- Refuse Arrangements
- Flood Risk and Surface Water Drainage
- Developer Contributions
- Heritage

Principle of Development

The site is within the urban boundary of Gravesend which is covered by Policy CS02 of Gravesham Core Strategy (LPCS) which supports the principle of residential development within the urban area of

Gravesend and rural settlements inset from the Green Belt. The proposed development should look to achieve a minimum density of 40 dwelling per hectare which would meet the target of Policy CS15 (LPCS).

Policy CS14 (LPCS) at 5.10.9 states that the Council will expect new housing to provide a range of dwelling types and sizes which take into account the existing character of the area and Policy CS15 (LPCS) at paragraph 5.11.7 states that the development should have regard to the character and location of the area.

At a national level, section 11 of the NPPF makes it clear that planning decisions should promote an effective use of land in meeting the need for homes and promote and support the development of under-utilised land and buildings.

However, the location of the site is severely constrained by the following:

- Part of the site is within the AQMA (A2)
- Traffic noise from A2 and Hever Court Road
- Isolated nature of the site.

As such the proposal for residential development at the eastern end of the site would not be supported as it would be contrary to Policy CS19 (LPCS) which requires the following:

- **New development will be located, designed and constructed to:**
 - **safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;**
 - **avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and**
 - **not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;**

In addition paragraph 170 of the NPPF states

- e) **preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and**

In summary I can confirm that the principle of residential development at the eastern end of the site would unlikely be supported due to the conflict with Policy CS19 (LPCS) and paragraph 170 of the NPPF. Furthermore, I would question if the proposal for 14 three bedroom family apartments in this location would be acceptable. The close proximity to the A2 would mean that the noise and air quality would make the terracing unusable and the lack of amenity space would provide unacceptable living conditions for families.

Layout/Design

The application will be going to the Design Surgery on 13 March 2019 and I will provide feedback in due course following the Design Surgery.

Highway issues

Adopted planning policy requires that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities.

Gravesham Highway Development Management officer has reviewed the enquiry and provided the following comments

1. Three bedroom apartments are not defined within the parking guidance issued by the highway authority. The nearest equivalent is a 3 bedroom house. This requires for the suburban edge, 2 parking spaces per unit plus 0.2 spaces per unit for visitors which can be on street. However Hever Court Road is subject to a 40 mph speed limit and no waiting at any time parking restrictions, which means three additional parking spaces, should be provided for visitors, giving a total of 31 spaces. In addition some provision should be made for the disabled and so it is suggested these additional parking spaces, whilst not reserved for the disabled should be of adequate width to accommodate their needs.
2. A standard size parking space is 2.5 metres x 5 metres, but the width increases to 2.7 metres when the space is adjacent to a boundary wall etc. A disabled parking space has a minimum width of 3.6 metres and the depth is increased to 5.5 metres minimum to allow access around the vehicle, however there is some suggestion this should be increased to 6 metres
3. Whilst not current Council policy, every space should be prewired for electric vehicles. But the actual EV charging point is not required at the current time, as this can be vehicle dependent and the technology is still being developed. However there will need to be sufficient space to install charging points on the wall. It is anticipated that if wall mounted, dual charging points will be installed between vehicles so allowing pedestrian access to the sockets. If the charging point is a pad under each parking space, then it is assumed there will still be a need to access a control box to activate the pad.
4. The end wall of the building where the vehicular access passes through should be provided with windows/openings to allow for drivers to see oncoming vehicles or pedestrians.
5. Cycle parking provision should be provided at the minimum rate of one space per flat, giving a minimum requirement of 14 spaces. In addition it is suggested that provision for at least 3 bicycles should be provided externally for visitors.
6. Sight line requirements at the access for a 40 mph road will be 103 metres x 2.4 metres x 103 metres minimum, based on the formula in Manual for Streets.

Living conditions for future occupiers

Policy CS19 (LPCS), which deals with Development and Design Principles, requires the design and layout of new residential development to accord with the adopted Residential Layout Guidelines document. This sets out the standards for the provision of internal space in new dwellings. In March, 2015, the Government introduced Nationally Described Space Standards. Since then, the Council has had to interpret its own standards according to the nearest equivalent national standard. It will continue to do this until a new set of standards is included in the adopted Site Allocations and Development Management Policies Document. The proposed development will need to meet current standards.

Notwithstanding the above as I have stated previously in this e-mail due to the site constraints; namely;

- Part of the site is within the AQMA (A2)
- Traffic noise from A2 an Hever Court Road
- Constrained nature of the site

The LPA view is that this site is unacceptable for residential development which I do not believe can be adequately addressed through redesign or planning conditions.

Impact on amenity of surrounding properties

Due to the isolated nature of the site the schemes which you are proposed would comply with GBC Residential Layout Guidelines (SPG2 February 1996).

Refuse Arrangements

Policy CS19 of Gravesham Core Strategy requires new development to incorporate appropriate facilities for the storage and recycling of waste. I have spoken with Gravesham Waste Management who have provided the following comments:

All collections are made from the front boundary of the property. Sufficient space should be allocated to allow space for storage and presentation for

- Refuse - 1 x 180ltr bin grey body and lid per property

- Recycling - 1 x 240ltr bin grey body and green lid per property
- Food Waste – 1 x 23ltr bin black body and orange lid with an individual 5ltr caddy per property

The Council offers an 'opt-in' garden waste service collected via a 240ltr or 140ltr bin. The take up of the service is extremely high therefore space should also be allocated to accommodate an additional bin.

The boundary (point of presentation) should be as close as possible to where the vehicle passes. The maximum distance bins will be moved by collection crews should be no more than 15 metres. Collections are from the point of the property nearest to the adopted highway. Collection crews and vehicles do not go on to private driveways, this includes shared driveways

Developers are required to pay for the provision of all bins required for a development.

Collections from sites will not occur until containers are in place. It is the responsibility of the developer to collect and remove any waste at their cost until the Council is satisfied that all waste requirements have been met. All complaints in regard to non-collection due to the fault of the developer will be passed onto to the developer for response.

The Council should be informed at least two weeks prior to collections taking place.

Wheelie bins specification

Capacity	180ltr Refuse Bin	240ltr Recycling Bin	23ltr Food Caddy
Length	540mm	585mm	380mm
Width	650mm	740mm	290mm
Height	1060mm	1100mm	405mm

Vehicle Dimensions

The Council uses three axle, rear steer 26 tonne collection vehicles.

Width – 2.5m

Overall length – 10.5m

Height – 3.8m

Kerb Turning Circle – 18m

Wall to Wall Turing Circle – 19m

With regard to Gravesham Waste Management being able to safely access the site I would suggest you make contact with Waste Management if you have any further questions. I would suggest you contact stuart.alford@gravesham.gov.uk

Flood Risk and Surface Water Drainage

Policy CS18 of Gravesham Core Strategy (2014) sets out the requirements for dealing with sustainable drainage and surface water run-off. Sustainable Urban Drainage Strategy (SUDS) for the site should include the following details within a scheme

Any future scheme should take into account the recommendations of your flood risk assessment and I would suggest that prior to submitting an application you engage directly with the Environment Agency who provided a pre-application service.

Any future application would need to include a drainage strategy for the site ideally with the planning application or it would be the requirement of a planning condition. Kent County Council is the lead Local Flood Authority so I would advise that you contact them if you require pre-application advice. Details of this service can be found online at <https://www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems#>. Please note any SUDS scheme would need to take into account the recommendations set out by the EA/flood risk assessment.

In addition I would suggest you contact Southern Water to discuss capacity within their network and their contact details are as follows: Southern Water, Sparrowgrove House Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk

Developer Contributions

It is important to ensure that sufficient infrastructure is provided to meet the needs of new residents, employees and businesses in the Borough. As recognised in the NPPF, the provision of new infrastructure is an important part of new development and the Council has worked with local service providers to identify their infrastructure needs over the plan period. Policy CS10 (LPCS) states that where new development generates an need for new infrastructure, developers will have to provide or contribute towards such provision, subject to viability consideration.

For a scheme of this size it is likely to trigger the following obligations **This may not be an exhaustive list*

Obligation	Sum	Trigger
Financial towards Primary School Expansion		Prior to commencement.
Financial contribution towards Secondary School Expansion		Prior to commencement.
Financial contributions towards Library Bookstock		Prior to commencement.
Financial contribution towards SAMMS		Prior to commencement.
NHS Contributions		Prior to commencement.
GBC Leisure/open space		Prior to commencement.
Adult Education/Social Care		Prior to commencement.

The Borough Council's position on affordable housing, as set out in Policy CS16 (LPCS), is that it will be required at a provision of 30% on sites in the urban area proposing 15 or more dwellings. The Council seeks a broad mix of 70% rented and 30% shared ownership, although the tenure mix should meet local needs and achieve a socially inclusive development. For 28 units this would equate to 9 units.

If you wish feel that the scheme would be unviable with the above contributions you would need to include an open book (Publicly available) viability assessment which would need to be independently reviewed and the applicant would be required to cover the cost of the Council's appointed surveyor.

I note that currently your proposal is below the threshold of 15 dwelling and in Policy CS16 (LPCS) would not be currently applicable.

In addition the application site is located in the Thames Estuary and Marshes Ramsar Buffer Zone. The Ramsar site is of international biodiversity importance, particularly for birds. Recent evidence suggests that there has been a decline in bird populations in the internationally significant Special Protection Areas (SPA) and Ramsar sites that make up the North Kent Marshes. There is currently insufficient evidence to adequately assess the cause of this decline although interim findings indicate that recreational activity causes disturbance to birds and that more development will lead to an increase in disturbance. In the meantime, a precautionary approach to development will be applied. It will be imperative that developers address and mitigate any detrimental impacts on biodiversity.

In this instance, the proposed development would result in the creation of 28 additional residential properties and as such, additional recreational activity would result. Therefore it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Gravesham Local Plan Core Strategy Policy CS12. In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site.

The proposed payment of £3,354.54 would be secured as part of the S.106 agreement (£239.61 per new dwelling unit) or you may sign the Strategic Access Management and Monitoring Strategy (SAMMS) Contribution Agreement. Details of which can be found online at.

<http://www.gravesham.gov.uk/home/planning-and-building/nature-conservation-and-landscape/thames-estuary-and-marshes>

<https://birdwise.org.uk/>

Heritage

Any future application should be aware that due to the close proximity to Watling Street the area may be an area of archaeological interest and I would suggest you make contact with KCC Archaeologist Wendy Rogers (Wendy.Rogers@Gravesham.gov.uk) to discuss further. Secondly 62m to the west of the hotel is Grade II listed public house (The George) any future application would need to consider the impact on this designated heritage asset.

Conclusion

In summary I can confirm that notwithstanding the comments from Design South East the principle of residential development on the site appears to be unacceptable and I would suggest you do not peruse the residential element any further on this site.

Many thanks

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.

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GRAVESHAM BOROUGH COUNCIL

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Appendix 3



Appendix 4



Appendix 5

