

## **PLANNING STATEMENT**

Supporting a planning application for the erection of a detached dwelling, associated parking along with the creation of a new vehicular access

LAND ADJ 33 IVY CLOSE  
GRAVESEND,  
KENT,  
DA12 5NP

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## 1. Introduction

This planning statement has been prepared to support the submission of a detailed planning application for the erection of a single detached dwelling and associated parking and access at land adj to 33 Ivy Close, Gravesend.

This statement accompanies the proposal together with various other information and detail contained within the application form, submitted to Gravesham Borough Council.

It offers a compelling case for the proposed development and considers the context of the site, relevant local and national planning policies and all other material planning considerations.

## 2. Description of Site

The application site lies along a residential street with detached and semidetached properties of various styles and where the character of the wider area is urban. The plot is located on a turning head adjacent to the semi-detached dwelling house known as 33 Ivy Close. The area benefits from good public transport services There are bus stops opposite Whitehill Parade and opposite Ivy Close providing good links through to the town centre and farther afield.

The plot is located to the west of the highway from which access is also gained. The site lies within the development boundary for Gravesend and is not subject to any Tree Preservation Orders and there are no public rights of way running through it.

The site lies within an urban settlement boundary of Gravesend as defined in the Gravesham Local Plan Core Strategy (Adopted) (September 2014).

The site is not located within a Conservation Area but is located within an Archaeological Notification Area.

The site is not within an area at risk from flooding.

### Relevant Planning History

The most recent and relevant submission at the site is planning application **2018/0641** which sought the erection of a detached one-bedroom bungalow in the side garden with associated

parking space. The application was approved on the 8<sup>th</sup> April 2019 but has not been implemented. It is relevant to note that the footprint of the approved dwelling was larger than that currently being proposed.

Prior to this application **2012/0452** for the erection of a detached one-bedroom bungalow in the side garden with associated parking space was approved.

Of some relevance to the current submission was an earlier application under **2010/0491** which sought the erection of a detached two storey, two-bedroom dwelling in the side garden with detached double garage at the side. The scheme was refused and upheld at appeal. One of the key concerns over this submission was the awkward arrangement of external space at the resultant property. The Inspector concluded that in respect of the amenity areas the 'awkward shape and shallow depth would place severe limitations on its use'. The current submission addresses these concerns by creating a property with a reduced depth along with parking to the front of the property. This allows for a staggered garden with a greater depth than that previously considered.

It should be noted that no concerns were raised with regard to overlooking or overbearance to the erection of a two-storey unit on the site.

Prior to the appeal and application under **2008/0510** for the erection of a two-storey extension in the side garden had been approved but not implemented.

### 3. Description of Proposal

We are seeking confirmation from Gravesham Borough Council that the erection of a new dwelling would be considered acceptable. In this instance we have included plans to indicate the layout and appearance of the proposed development.

The scheme proposes the erection of a two storey residential unit and associated parking and landscaping. This proposal is advanced on the guidance of the Council concerning the design requirements within this part of Gravesend and in view of the neighbouring developments and previous decisions made at this site.

The site forms land adjacent to existing development and fronts Ivy Close. The site is generally level and there is good highway access with clear visibility to and from the site.

The form and scale of the building has been carefully considered and designed to relate to the street scene and neighbouring properties. In this instance, it is not considered that the erection of new built form as proposed would have an impact on the significance of the adjoining property.

The plans submitted for consideration within this statement emphasize the type of design that is forwarded as a modest sized dwelling.

#### Design and access Statement

The National Planning Policy Guidance (NPPG) sets out that: *"A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users. ... The level of detail in a Design and Access Statement should be proportionate to the complexity of the application but should not be long."*

#### Surrounding context and development

As a settlement, Gravesend has a predominantly historic setting as a market town with a range of property types and designs forming an archetypal 'Kentish' vernacular which has evolved over a number of centuries.

The dwellings which make up the town and the more local vicinity as it appears today comprise a number of forms ranging from bungalows to chalet bungalows, two-storey traditional dwellings, terraces and flats. A wide range of materials have been used on the existing housing stock, so it could be said that there is no overriding architectural style that can be favoured.

The immediate area is fairly typical of the more modern wider settlement character. The adjoining dwellings within the immediate vicinity of the site incorporate common two-storey buildings. Many of the buildings are terraced or semi-detached although there is an element of detached and flat properties within the wider vicinity.

In response to this it is anticipated that any subsequent designs encourage predominately two storey units. A variety in size and shape of plots with detached, semi-detached and terraced housing distributed evenly throughout the site can be evidenced in the accompanying block plan.

It is intended that any development reinforces the character of the townscape

#### Use

The proposal is for the creation of an additional unit. The proposed use would be in keeping with the existing residential uses adjacent to the site.

#### Amount

The site sits comfortably within a built-up area and in view of the site curtilage is an obvious location for additional residential development.

#### Layout

The plan demonstrates that an additional dwelling can be accommodated without any unacceptable impacts on neighbouring properties, boundaries of the site, or the wider area.

#### Scale

A two-storey dwelling can be comfortably accommodated at the site due to the design of other dwellings surrounding the site and the siting of these dwellings themselves.

The height, bulk and mass together with the use of similar materials all ensure the proposal would not appear visually harmful to the street scene or character of the area.

### Appearance

The principles to be adopted in regard to appearance aim to ensure the development will form an identifiable arrangement and the design of the building will be sympathetic to the predominant styles and character of the area.

### Landscaping

The following features are suggested by the proposed layout:

- Enhancement of vegetation along the boundaries of the site;
- Areas of open and garden space; and
- Permeable areas for incorporation into Sustainable Urban Drainage Systems (SUDs).

New planting and landscaping would provide an opportunity to enhance the character of the area.

### Access

It is proposed to use the existing access from the highway to serve the proposed dwelling.

The proposed development will fully comply with current adopted policy in respect of cycle parking provision.

#### 4. Planning Policy

This section sets out the relevant planning policy framework for the site.

Under Section 38(6) of the Planning and Compulsory Purchase act 2004, if regard is to be had to the development plan determination must be made in accordance with the plan unless material considerations indicate otherwise.

##### National Planning Policy Framework 2021

Paragraphs 2 and 212 of the National Planning Policy Framework (NPPF) make it clear that this national guidance constitutes a material consideration in determining applications. In addition to local planning policies, it is therefore necessary to consider the NPPF.

The NPPF places a presumption in favour of sustainable development at the heart of the planning system. The NPPF, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system. However, Paragraph 8 clarifies that there are three dimensions to sustainable development: economic, social and environmental.

In terms of the economic dimension, the proposed development would provide benefits by supporting local businesses, both during construction and in terms of the needs of occupiers. There would be an investment in local trades and suppliers. The 'Plan for Growth' published by HM Treasury in March 2011 confirms that a successful construction industry is vital for sustainable growth in the UK and sets out that this includes the construction and maintenance of homes. It notes that providing new homes in the right places is vital for future economic competitiveness. Even a purely residential project of the scale proposed is therefore able to make a contribution to the economic aspect of sustainability, primarily through its construction.

With regard to the social dimension, the proposal would provide benefits in the form of a new dwelling which would make a small, albeit valuable contribution to local housing supply in this area. This proposal would represent an appropriate intensity of development in this urban setting.

When considering the environmental dimension one of the Framework's core principles encourages the re-use of existing resources including making effective use of land. It is therefore

submitted that significant weight should be attributed to making use of this previously developed land within a sustainable location and urban confines.

This all being said, Paragraph 11 explains that, for decision-taking, the presumption in favour of sustainable development means granting permission unless any adverse impacts would significantly and demonstrably outweigh the benefits of the application, when assessed against the policies of the NPPF as a whole.

It is also emphasised that it is not appropriate only to weigh the positive impacts against the negative impacts. Moreover, it is only necessary to demonstrate that any adverse impacts would not significantly outweigh the benefits. Thus, where the decision-maker considers that there would be any adverse impacts, it is necessary to consider that these would significantly outweigh the benefits, otherwise the NPPF makes it clear that the balance should be in favour of approving the development.

As indicated above the development of the site would provide an opportunity to create a well-designed, modest development that would enhance the site and add to the visual character of the immediate vicinity.

Paragraph 20 of the NPPF requires strategic policies to set out an overall strategy for the pattern, scale and quality of development and make sufficient provision of housing (amongst others). Footnote 12 clarifies this to be *"in line with the presumption in favour of sustainable development"*.

In respect of housing supply, Paragraph 60 adds further that *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*.

Section 11 of the NPPF gives substantial weight to the value of using suitable brownfield land, and planning decisions should *'promote and support the development of underutilized land and buildings, especially if this would help to meet identified needs for housing'*.

Furthermore, paragraph 119 refers specifically to making effective use of land in meeting the need for homes and other uses, with Paragraph 120(d) stating that planning policies and

decisions should *"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..."* Footnote 48 acknowledges that this should include bringing empty homes and other buildings back into residential use.

At paragraph 126 *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*. It is acknowledged that a successful scheme would enhance the currently underused site and provide an opportunity for a suitable and sustainable design to be levied.

Paragraph 130 says *"decision should ensure that developments;...add to the overall quality of the area; ...optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; ...sympathetic to local character and history... while not preventing or discouraging appropriate innovation or change; ...are visually attractive as a result of good architecture, layout and appropriate and effective landscaping"*.

The proposal would also optimise the potential development at this site, within the permissible restraints of local planning policies. The design approach seeks to reflect the identity of local surroundings and materials in an innovative manner which, respectfully should be encouraged by the Local Planning Authority.

The NPPF sends out a very clear message that the Government considers planning to play a vital role in building our economy and encouraging growth in both urban and other areas and significant weight should be attached to the advice set out within it. The planning application fully accords with advice set out in the Framework through the provision of additional residential accommodation in a highly sustainable location.

## Local Plan Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise. The relevant Development Plan against which the proposals will be considered comprises the Development Plan currently incorporates the Gravesham Core Strategy (September 2014) and the saved policies of the Gravesham Local Plan First Review (1994).

The relevant policies are set out below Gravesham Core Strategy Local Plan 2014

The Core Strategy sets out the Council's vision to guide the future pattern and form of development over the plan period until 2028.

### Policy CS01 Sustainable Development

The proposal would utilize sustainable construction methods where possible and is located in an area with good transport links and access to a range of services.

### Policy CS19 Design & Development Principles Policy

Policy CS19 of the Gravesham Borough Council Core Strategy states that new development will be visually attractive and incorporate sustainable construction standards and adaptable to changing lifestyles. This is achieved by:

- Compliance with the criteria set out in the Kent Design Guide standards;
- The proposal meets the principles of sustainable development in terms of access to public transport links local services and community facilities without placing an undue burden on existing infrastructure
- The proposal Does not inflict burdens on the neighbouring properties by loss of sunlight or privacy over that common between neighbouring properties. The overall form and scale of the property has been reduced and provides for a greater level of amenity around the dwelling.

- The unit will have no significant impact on the neighbouring properties and will hence have no impact on sunlight / shading as there will be no overshadowing.
- The design meets the national space standard guidelines

#### Policy CS14 Housing Type and Size

Policy CS.14 requires the development to be considered in relation to housing type and size:

- The site lies within an established residential area and the development proposals equate well with the occupancy ratios surrounding the site, allowing for good family accommodation with access to the principle highway.
- The overall development proposal will add to and enhance the accommodation / occupancy mix along the road both in support and in character with surrounding properties in line with sustainable development objectives.

#### Policy CS15 Housing Density

The adopted Core Strategy Policy CS15 (Housing Density) recommends a minimum density of 40 units per hectare in the urban area of Gravesend.

#### Policy P3 Parking Standards and Policies T1 Impact on Highway Network

With consideration to policies P3 and T1, Car parking is provided on site to Kent County Council (Highway) standards and there is adequate storage of waste and recycling of waste provided within the rear garden areas.

#### Policy Summary Conclusions

It remains a fundamental Government Objective to significantly boost the supply of homes and this is particularly relevant in areas like Gravesend where there is not a 5-year supply of housing and where the supply of housing provision is reduced given the constraints of the districts designated landscapes and environments.

The benefits resulting from the proposed development are not in question with those relating to the provision of additional housing being considerable. The current proposals are for a



minor limited form of development which is not in conflict with national policy. The site specifics and nature of the proposal is such that there will be no impact on the wider area and its amenity values.

The proposal would accord with the economic, social and environmental benefits set out in the NPPF 2021.

Gravesham Borough Council

## 5. Planning Appraisal

The following section of this Statement considers the material planning issues arising from the proposed development with reference to the planning policy framework set out in the previous section, including the NPPF and the adopted Local Plan.

The primary issues regarding the proposed development and change of use are:

- Principle of development
- Impact upon character and appearance of the locality.
- Impact upon amenity of neighbouring properties
- Parking and Highways
- Landscaping
- Contributions

### Principle of Development

The principle of residential development at this site has already been established through the 2 no previously approved schemes.

Paragraph 74 of the NPPF requires local authorities to identify a supply of specific deliverable sites to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than 5 years old.

The five-year supply of sites additionally requires a 5% buffer to ensure choice and competition in the market for land, 10% where the local planning authority wishes to demonstrate a five year of deliverable sites through an annual position statement or recently adopted plan to account for any fluctuations in the market during that year. Importantly, where there has been a record of persistent under delivery of housing through the Housing Delivery Test (HDT), local planning authorities should increase the buffer to 20%.

The latest national Planning Practice Guidance (PPG) states that for local planning authorities that deliver less than 85% of their identified housing requirement, a 20% buffer would then be added to their housing land supply position, with immediate effect from the publication of the HDT results. Only a 5% buffer would apply where the local planning authority has results of at

least 85% for its HDT measurement and where they are not seeking to demonstrate a five year housing land supply position

The government has recently published its HDT results for 2021 and this confirms that Gravesham Borough Council Wealden District Council had a result of 57% against its housing requirement. The implication of this result means that the local planning authority is required to use a 20% buffer for its five year housing land supply position.

This engages the first part of footnote 7 of the National Planning Policy Framework and this means for decision-taking that planning permission for applications involving the provision of housing should be granted in line with the requirements of the National Planning Policy Framework Para 11(d). Given the Council's lack of five-year housing supply, the presumption in favour of sustainable development is engaged. Although this is not a blanket green light for housing development, the planning balance is altered so that the benefits must exceed any perceived harm.

The proposed development has been considered in relation to NPPF and GBC policy requirements.

Site context, vernacular design styles, space standards, social and occupancy add to the environmental impacts which together demonstrate a sustainable development proposal. It is considered that the principle of the erection of a dwelling would be acceptable within this location as it sits within the development boundary of Gravesend and with due regard that the Council can currently substantiate a 5-year housing land supply and would remain in accordance with the Councils policies.

#### Impact on the Street Scene and Character of the Area

A key element of this proposal is whether the Council would take the view that the creation of a well-designed dwelling would be acceptable. The elevation plans show the height of the proposed building to be generally reflective of other residential dwellings within the area, respecting the prevailing pattern of development.

As noted above the scheme has been prepared to meet with the specific criteria in relation to development in the surrounding area as set out both within the NPPF and Gravesham Development Plan.

It is strongly submitted that the proposal would result in a visually attractive scheme which enables an optimal use of the land in line with the NPPF and as a consequence of good architecture and appropriate landscaping.

The proposed building is shown to incorporate a mixture of brick work with tiles to the roof. These materials are considered to be reflective of this area. It is therefore submitted that the proposed building would not detract from the character of the street scene or wider area.

The principles to be adopted in regard to appearance aim to ensure the development will form an identifiable dwelling house with the arrangement and design of the building being sympathetic to the existing character of the area.

#### Residential amenity

This submission seeks confirmation of the suitability of the site for development. Nonetheless, it is inevitable that with any form of development on this site that there will be a change in perception and character.

The layout shown has been designed to ensure that building is located and orientated to avoid direct overlooking and achieve good levels of privacy between dwellings and adjoining neighbours.

In addition, the dwelling as proposed would retain a gap to the boundaries and so the separation distance between the site and neighbouring properties is such that no concerns are thought to arise in terms of overbearance, outlook and loss of light/overshadowing.

#### Living conditions for future occupiers

The development would provide acceptable living conditions for its occupiers. The larger areas of amenity around the dwelling, which exceed those approved under **2018/0641**, would provide for a greater circulation around the building. There would therefore be no conflict with Policy within the Local Plan because acceptable levels of privacy would be available to the development's occupiers.

It is noted that local policy requires proposals to provide adequate residential amenities for existing and future occupiers of proposed development.

Para. 126 of the National Design Guide (2019), which is a companion to the Revised National Planning Policy Framework, states that *'well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation.'*

Nationally described space standard define the minimum levels of Gross Internal Area (GIA) that should be provided for new residential development, based on the amount of bedrooms provided and level of occupancy. The proposed dwelling would incorporate the provision of spacious living and dining areas with sufficient amenity space available within the site for a dwelling of this size. The property would each have a GIA which exceeds the nationally described space standards for a 3-bedroom, 4 person dwelling.

All primary habitable rooms across the development are served by clear glazed openings. Awkwardly shaped rooms and long corridors are avoided, thereby ensuring that the functionality and accessibility of the internal space within the property is maximised. There is ample available space to fulfil the amenity requirements of the applicants long into the future. The new dwelling will have good garden amenity space to the rear which includes a west facing aspect.

In light of the above, it is clear that there is not any amenity matter that would constitute an adverse impact that would indicate that the proposal should not be considered in accordance with the development plan. The proposed dwelling would offer sufficient levels of amenity for future and neighbouring occupiers and therefore accords with Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and the National Planning Policy Framework 2021 in this regard.

#### Highways and Transport Impacts

Policy P3 and T1 state that all new development should provide satisfactory means of access for vehicles and pedestrians and provide adequate parking in this location with 3 or more bedrooms requiring 2 no independent parking spaces. The site benefits from adequate visibility splays at this point in Ivy Close and in terms of parking, the proposed plans show that there is a designated parking for 2 cars.

The proposal for an additional dwelling would not amount to a significant material increase in traffic numbers, nor to any severe residual cumulative impacts. As such, there would be no

requirement for this application to be accompanied by a Transport Statement or Transport Assessment, in accordance with the NPPF

### Landscaping

Paragraph 180 of the Framework identifies that, where possible, developments should *'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'* Due to the poor condition of the existing area of land, the proposal is not considered to have any significant impact upon the overall character of the area and it would not result in the loss of any biodiversity features but lead to a net gain as the scheme would incorporate the provision of additional planting should the Council consider that necessary to help integrate the development within the street scene.

The gardens will be laid mainly to lawn with some hedging and tree planting proposed along borders. The existing trees to the rear are to be retained.

In terms of hardstanding the parking area, paths and patio area would be permeable materials comprising paving and gravel.

### Contributions

The applicants confirm that they are happy to make any required provision under the Community Infrastructure Levy, as required.

In addition, the applicants confirm their intention to secure a contribution towards strategic mitigation measures within Special Protection Areas, if required, to comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 175 and 176) of the National Planning Policy Framework 2019 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

## 6. Conclusion

The most relevant material consideration is the NPPF at paragraph 11 which makes it clear that when policies for provision of housing are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole. The proposal would provide a contribution towards meeting the undersupply for housing for the district. This carries significant weight.

It is submitted that this proposal would constitute a sustainable form of development when compared against the three dimensions to be considered in accordance with Paragraph 8 of the NPPF, namely the economic benefits, the social benefit, including the sustainability of the location, and the environmental benefits, including landscape and visual impacts.

The application scheme would be compatible with surrounding uses, is of a comparable design and is within a sustainable location providing access to a wide range of services and facilities, including public transport connections. In accordance with the NPPF and the local plan, the proposed development therefore makes the best use of the site.

The development is therefore considered to be in accordance with local and national planning policies and requirements, particularly in regard to paragraph 38 of the NPPF, which states that local planning authorities should approach decision-making in a positive and creative way and advises that they should use the full range of planning tools available, seeking to approve applications to sustainable development where possible.

As such, we trust that this application can be considered favourably.

For the reasons set out above the scheme accords with adopted local plan policies and national guidance documents.