

MADDOX PLANNING

PLANNING STATEMENT

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**GARAGES AND LAND TO THE REAR OF OSNEY WAY, LOWER HIGHAM ROAD, GRAVESEND.
NOVEMBER 2021**

Description of development

Demolition of 14 existing lock-up garages and the erection of 4 no. three storey terraced houses, with associated parking, gardens, access, refuse, bike storage and boundary treatment.

Type of application

Full planning application.

Applicant

Stem Homes Limited.

List of supporting documents (as per planning permission ref: 20201379)

1. Archaeological Statement – Wessex Archaeology (November 2021)
2. Construction Management Plan – Paul Mew Associates (November 2021)
3. Daylight, Sunlight Assessment – T16 Design (November 2021)
4. Design and Access Statement – Office S&D (November 2021)
5. Flood Risk Assessment and SUDs Strategy – Herrington Consulting (November 2021)
6. Landscaping Plan – Maude (November 2021)
7. Transport Statement – Paul Mew Associates (November 2021)

Development plan

The adopted development plan comprises:

1. Gravesham Local Plan Core Strategy and Policies Map (2014)
2. Gravesham Local Plan First Review 'saved' Policies (1994)
3. Kent Minerals and Waste Local Plan 2013-2030 (2020)

The emerging development plan comprises:

1. Gravesham Local Plan Regulation 18 Stage 2 Consultation Part 2: Development Management Policies Document (2020)
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Policies map

The following designations on the policies map are particularly relevant:

1. Urban Area
2. Local distributor road – fronting the Site.
3. Area of Archaeological Potential

Planning policies

The following adopted and emerging planning policies are particularly relevant:

Document	Policy number	Policy title
Core Strategy	CS01	Sustainable Development
	CS02	Scale and Distribution of Development
	CS11	Transport
	CS12	Green Infrastructure
	CS14	Housing Type and Size
	CS15	Housing Density
	CS18	Climate Change
	CS19	Development and Design Principles
	CS20	Heritage and Historic Environment
Local Plan First Review 'saved' Policies	TC7	Other Archaeological Sites
	T1	Impact of Development on the Highway Network
	T2	Primary and District Road Network
	T5	New Accesses onto Highway Network
	P3	Vehicle Parking Standards
	LT6	Additional Open Space in New Housing Development
Emerging Local Plan, Regulation 18 Stage 2 Consultation Part 2: Draft Development Management Policies	INF2	Transport Design Principles
	INF3	Understanding and Mitigating Transport Impacts
	INF4	New Accesses and Junctions
	INF5	Electric Vehicle Charging Points
	RES2	Residential Space Standards
	RES6	Residential Intensification through New Build
	AM1	Air Quality
	AM4	Sunlight and Daylight within New Development

Other material considerations

Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

1. The National Planning Policy Framework (2021)
2. National Planning Practice Guidance (2021)
3. Kent Design Guide (2006)
4. Kent Vehicle Parking Standards (2006)
5. Vehicle Accesses on Classified Highways (1992)
6. Residential Layout Guidelines, including Housing Standards Policy Statement (1996; as amended 2020)
7. Technical Housing Standards: Nationally Described Space Standards (2015)

Relevant planning decisions

Reference/address	Description	Status/decision date	Referred to in paragraph number of this statement
20201379	Demolition of 14 existing lock-up garages and the erection of 3no three storey houses, with associated parking, garages, access, refuse and bike storage, and boundary treatments.	Planning permission granted 17.03.2021	Throughout statement.

Contents of this statement

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Introduction

- 1.1 On the 17th March 2021 Gravesham Borough Council ('the Council') granted planning permission for the demolition of the existing garages on site and erection of three 3-bedroom houses, extending to three storeys in height (LPA reference: 20201379 / 'the previous planning permission'). Notably, this established the principle of residential and other key development parameters at the Site, which was subject to extensive pre-application dialogue with officers, the Southeast Design Review Panel, alongside engagement with the local community (as detailed within the supporting Design and Access Statement).
- 1.2 The Applicant is now seeking to build on the previous planning permission, including an extension to the development boundary (including underutilised grass land to the south of the garages) to provide much needed family housing, at a sustainable, brownfield site, whilst taking on-board previous officer comments in proposing improvements to the previous scheme. This ultimately supports the objectives of the NPPF and Gravesham Core Strategy; meeting an identified housing need – as evidenced in the most recently Strategic Housing Market Assessment ('SHMA'). Optimising previously developed land for housing is also a key aspiration for the Government, as stated in the Housing White Paper (2021) which has been published since the previous planning permission was granted at the site. This is particularly important for areas where suitable land is sparse, and there is a pressure to deliver against housing targets. This includes Gravesham, where the presumption in favour of sustainable development must be applied in assessing housing proposals, due to the most recent Housing Delivery Test Results (2021). This should be afforded significant weight, with the proposals as submitted herein wholly welcomed in planning terms.

Site and area description

- 2.1 The site is located on the south side of Lower Higham Road near its junction with Chalk Road, in Gravesend, Kent. The site area is approximately 0.0538 hectares.

Lower Higham Road Local Centre is located to the north-west of the site, with several local shops and amenities. This is highlighted on page 27 of the submitted Design and Access Statement.

- 2.2 The Site predominantly comprises 14 semi derelict lock-up garages and an associated access road, connecting to the south side of Lower Higham Road, alongside a strip of grass land to the south of the garages. This was formerly part of the residential plot of The Brambles, Osney Way, located directly to the south-west corner of the site.
- 2.3 The existing garages are not used by local residents and the leases have been brought to an end. Thus, the Site is heavily underutilised and continues to attract anti-social behaviour, dumping and other criminal damage – whereby its redevelopment would help to benefit the local area whilst providing much needed housing for the Borough at a sustainable, brownfield site.
- 2.4 The full extent of the Site is highlighted in red on the submitted Site Location Plan with an aerial image included below. Further images are also included on page 11 of the submitted Design and Access Statement (as prepared by Office S&M):



Figure 1.1: aerial image of the site with indicative site boundary (source: Google Maps)

- 2.5 Vehicular access to the Site is obtained via a ramp that runs along the west side of the Chalk Parish Hall. The Parish Hall is a large modern building that adjoins the Site, immediately to the east of the garages (as shown on Figure 1.1).
- 2.6 Directly to the north lies a Council owned public car park which is currently leased to the Parish Hall. Although lapsed, the car park previously received planning permission for the erection of two three storey houses (ref: 19760070); highlighting the acceptability of housing in this location.

- 2.7 The wider area is residential in character with a two-storey detached property (known as the Brambles) located directly to the south-west of the Site. Pirrip Close is also located to the east, comprising a cul de sac of terraced houses. There are also several houses in the immediate vicinity which have been subject to loft extensions, extending to three storeys in height. This includes properties along the Lower Higham Road frontage, located directly opposite the site.
- 2.8 The Site lies in Flood Zone 1 (as per the Environment Agency Flood Map for Planning as held online) with low susceptibility to flood risk. Whilst the Site area and nature of development falls outside the threshold for a Flood Risk Assessment, this has been submitted in accordance with feedback from officers on the previous planning application, alongside a SUDs strategy.
- 2.9 The Site is not subject to any statutory or local listings and does not lie within a designated conservation area. However, the Site does fall within an area of archaeological potential whereby an archeological assessment has been prepared by Wessex Archaeology and submitted in support of this planning application.

Proposed development

3.1 The proposed description of development is:

'Demolition of 14 existing lock-up garages and the erection of 4no. three storey terraced houses, with associated parking, gardens, access, refuse, bike storage and boundary treatment.'

Table 3.1: Housing size and tenure

	No of units	Tenure	%
Two-bed	1	Private	25%
Three-bed	3	Private	75%
Total	4	Private	100%

Table 3.2: Existing and proposed floor space areas

	Existing GIA	Proposed GIA
Garages	250sqm	N/A
Grass land	77sq.m	N/A
Residential	N/A	396.3sqm
Total	327sqm	396.3sqm

Layout

- 3.2 The proposed development is for a terraced mews of houses, located towards the Parish Hall, with gardens to the rear and car parking at part undercroft level. The placement of the "mews" closer to the Parish Hall allows the creation of larger gardens, whilst being respectful of neighbouring boundaries. This approach was welcomed previously by the Southeast Design Review Panel. The houses are accessed from the east and orientated towards the side elevation of the Parish Hall with a front court extending along the eastern boundary in providing an inviting and dedicated access for future occupiers. The proposals have been carefully laid out to ensure adequate separation between neighbouring residential properties and meet and exceed national space standards in terms of bedrooms and the overall size of the units. This is summarised in Table 3.3 and on page 28 of the submitted Design and Access Statement.

Table 3.3: Proposed internal areas against national space standards

	House Size	Proposed Internal Area	National Space Standard
House 1	3-bedroom 4 person	96.8sq.m	90 sq.m – exceeds
House 2	3-bedroom 4 person	99.9sq.m	90 sq.m – exceeds.
House 3	3-bedroom 4 person	97.9sq.m	90 sq.m – exceeds.
House 4	2-bedroom 4 person	101.7sq.m	80 sq.m – exceeds.

Scale and massing

- 3.3 The houses extend to three storeys in height, including a dormer bedroom at the roof level and gable ends which is in keeping with existing properties in the surrounding area and the heights approved by way of planning permission reference 20201379. The dormers have also been carefully angled to the north, away from the Parish Hall to prevent overlooking and noise impacts, whilst tying into the form of the surrounding context. Undercroft parking is also provided, with the upper floors of the houses overhanging this element (as indicated on the Proposed Floor Plans).

Tenure

- 3.4 All four of the proposed houses are for private sale.

External appearance

- 3.5 The proposals are of high-quality and comprise a contemporary design, as illustrated within the submitted Design and Access Statement, Proposed Elevation Plans and CGIs (as prepared by Office S&M). Whilst the final materials will be conditioned, it is proposed to use a fibre cement weatherboarding for the houses, which will seek to replicate the weatherboarding which was historically used for the construction of houses in the local area. It is also proposed to incorporate a lighter coloured cladding for the undercroft area, in creating an open and inviting arrival to the houses. Rotated glazed windows are also proposed on the northern elevations, looking northwards, and turned away from the Parish Hall and front dormers. The material palette is illustrated and explained in further detail on pages 40-42 of the submitted Design and Access Statement.

Landscaping and amenity

- 3.6 All the houses have private amenity space in the form of gardens which all meet the minimum requirements set out under SPG2 (Residential Layout Standards), with Houses 1 and 4 exceeding the guidance standards. A breakdown for each house against SPG2 requirements is provided in the table 3.3 below and page 50 of the Design and Access Statement.

Table 3.4: Breakdown of private amenity space per house

	House size	Total Proposed Private Amenity (sq.m)	SPG2 Minimum Garden Requirements
House 1	3-bedroom 4-person	61.1sq.m	60sq.m – exceeds.
House 2	3-bedroom 4-person	60sq.m	60sq.m – meets.
House 3	3-bedroom 4-person	60sq.m	60sq.m – meets.
House 4	2 bedroom 4-person	37.5sq.m	37.2sq.m – exceeds.
Total:	N/A	218.6sq.m	N/A

- 3.7 Tree planting and biodiversity features are also proposed in the rear gardens, including bird boxes and bug houses. It is also proposed to use reinforced grass, gravel and permeable resin bound to enhance the green infrastructure network and existing outlook of the site. This is illustrated on the submitted Landscaping Plan (as prepared by Maude).

Access and parking

- 3.8 It is proposed to utilise the existing access for pedestrians and vehicles, which incorporates a gated system at the top of the ramp. Five car parking spaces are provided at part undercroft level, with one of the parking spaces proposed to have electric vehicle charging. Dedicated cycle storage is also provided for each of the houses within a secure shed, in each of the rear gardens. This includes three cycle spaces for each house. Both the car and cycle parking are provided in line with the Council's standards (as discussed in further detail in the key considerations section of this statement).

Refuse and servicing

- 3.9 The proposals include dedicated bin storage for each of the residential units at ground floor level, within an enclosed waste storage area. The bins can be accessed from the front door of each house. Euro compost bins are also provided within the rear gardens, in supporting sustainability objectives and helping to reduce food waste. Refuse will be collected from Lower Highman Road (as per the strategy agreed under planning

permission reference 20201379). The location of the bin storage areas, compost bins and speciation details are included on page 59 of the submitted Design and Access Statement and Proposed Ground Floor Plan.

Gravesham Borough Council

Considerations

4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are considered to be:

- Principle of residential development.
- Loss of existing garages.
- Design and massing.
- Housing mix and tenure.
- Residential quality.
- Neighbouring amenity including daylight/sunlight.
- Highways and servicing.
- Archaeology.
- Surface Water Drainage.

Principle of residential development

- 4.2 At the heart of the NPPF there is a presumption in favour of sustainable development. As set out in paragraph 8, there are three components of sustainable development that the planning system seeks to achieve. These are its economic role, its social role, and its environmental role. The planning system should support the growth of strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. It should also foster a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 4.3 As set out in paragraph 8 of the NPPF, one of the three components of sustainable development that the planning system seeks to achieve is its social role, whereby it must provide the supply of housing required to meet the needs of present and future generations. Paragraph 60 of the NPPF also seeks to boost significantly the supply of housing, and paragraph 119 encourages the effective use of land by re-using land that has been previously developed.
- 4.4 Paragraph 120 of the NPPF further states that planning decision 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, and available sites could be used more effectively. Local authorities should also take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.
- 4.5 NPPF paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, considering the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it. Notably, *'where there is an existing or anticipated shortfall of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.'*
- 4.6 The NPPF Paragraph 69 is also clear that small and medium sized sites can make an important contribution to meeting the housing requirement for an area, recognising that they be built out relatively quickly.

4.7 The Local Plan Core Strategy Policy CS02 sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2026) and states that there is a need for **6,170** new dwellings. The most recent Annual Monitoring Report (January 2021) acknowledges that the Council is not able to currently demonstrate a five-year housing supply, reporting only **3.27 years** over the next five years. In January 2021, the Government published their National Housing Delivery Test 2020 Measurements, which set out the calculated total net homes required for each local authority over the Housing Delivery Test period 2017/18, 2018/19 and 2019/20). The total number of homes Gravesham has delivered in this three-year period is **731** out of a total calculated requirement of **1,043**. This represents significantly **less than 75% delivery** on what is required by the Government. Delivery below 75% requires Local Planning Authorities to apply the presumption in favour of sustainable development when assessing housing development. This means that planning permission should be granted unless adverse impacts "significantly and demonstrably" outweigh the benefits. Indeed, this was acknowledged in the officer's report for the previous planning permission, noting that the housing delivery element of Policy CS02 must be regarded as out of date, with the principle assessed against the requirements of the NPPF Paragraph 11(d) which states that:

- Where there are no relevant development plan policies, or the policies are out of date¹ which are most important for determining the application are out-of-date, granting permission unless:
 - i) The applications of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework as a whole.

4.8 Taking account of the above and the previous planning permission for the site, it is considered that the principle of residential development, should be welcomed in planning terms – which will further assist the Council in meeting their housing requirements including much needed family accommodation as identified within the most recent Strategic Housing Market Assessment ('SHMA'). This also explicitly supports the requirements of the NPPF Paragraph 120 which states that housing development should be supported *'especially if this would meet identified needs for housing, where land supply is constrained.'* This will also help in reducing pressures on the Council to release rural land for housing, as evidenced by the emerging Local Plan Regulation 18 document which specifically seeks the allocation of sites for housing. A case is further supported by the fact that the Site lies within the designated urban area, whereby housing development is prioritized in supporting sustainable forms of development (as per Core Strategy Policy CS02). This explicitly includes the redevelopment and recycling of previously developed land, particularly sites located close to public transport and local amenities (i.e., the site) and should therefore be supported on this basis.

4.9 Further, it is noted that the Site itself does not lie in any protected areas, nor does it comprise any asset of particular importance; the same applying to the wider site area/demise. This provides further justification for redevelopment of the land for housing, against the requirements of the NPPF Paragraph 11(d)(i) in applying the presumption in favour of sustainable development. It is also considered that there are no adverse impacts which would significantly or demonstrably outweigh the benefits – as demonstrated in the remaining sections of this statement.

Loss of existing garages and grass land

¹ This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

- 4.10 Since planning permission ref: 20201379 was granted at the site, the 14 existing garages have become increasingly dilapidated, with only 7 previously rented and used for lock-up storage. None of the garages were being used for car parking by local residents. The leases have now ended, with the garages being vacant; increasingly attracting anti-social behaviour and are a blight on the townscape. As such, it is considered that redevelopment for housing would be more in keeping with the character of the area and make a better use of the Site into the future, whilst increasing public safety and security – in accordance with the NPPF Section 11. This was indeed acknowledged and established by way of planning permission reference 20201379 which should also be considered acceptable in this case.
- 4.11 The grass strip of land within the southern portion of the Site is also underutilised and in a poor state of repair, which is not allocated/protected for any land use, again supporting its redevelopment for housing (acknowledging that it also lies within the urban area of Gravesham). The loss of both the garages and grass land is therefore justified on this basis and will significantly enhance the existing outlook of the site to the benefit of the local area.

Design and massing

- 4.12 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development. Paragraph 126 of the NPPF states that 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. In October 2019 the Government also published the National Design Guide, helping to address the question of how well-designed places are recognised, by outlining and illustrating the Government's priorities for well-designed places. In July 2021 the National Model Design Code was published which provides detailed guidance on the production of design codes, guides, and policies to promote successful design.
- 4.13 The NPPF Paragraph 130 further states that planning policies and decisions should ensure that developments:
- a) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping.
 - b) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
 - c) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - d) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.
- 4.14 Paragraph 134 also outlines that significant weight should be afforded to '*outstanding or innovative solutions which promote high levels of sustainability or help raise the standard of design more generally in the area, so long as they fit in with the overall form and layout of their surroundings.*'
- 4.15 With regards to Paragraph 130 of the NPPF, houses in the neighbouring area predominantly comprise of two storey terraces, with a bedroom in the roof with a dormer. The proposals adopt that same approach and therefore are considered to complement the character and scale of the area which should be supported on this basis. Indeed, this principle is also established by way of planning permission ref: 20201379, which provides further justification for the proposals submitted herein. The houses have also been set-back from the site boundary and away from adjacent properties that are more sensitive to increased massing, which again supports the general urban form of the locality and guidance set out under SPG2 Paragraph 17. All the units meet nationally described floor to ceiling height requirements, with the finished floor level being 9.5 metres from ground floor to the top of the roof. It is also noted that the proposals fall outside the 25-degree rule stated and illustrated under Paragraphs 21-22 of the SPD2 since there is a significant amount of open

space around the proposed houses. This prevents overshadowing and therefore further supports the proposed massing in this regard. This is further illustrated in the supporting Design and Access Statement.

- 4.16 The proposals equate to a density of 65 dwellings per hectare, which exceeds the minimum requirements set out under Core Strategy Policy CS15 for housing proposals at sites within the urban area. This is considered highly appropriate, given the brownfield nature of the site, located close to the Gravesham Local Centre, in tandem with being in keeping with the character of the surrounding area. The NPPF Paragraph 125 is also clear that *'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.'* As evidenced by the most recent Housing Delivery Test Results (2021), the Council are currently underdelivering on their housing targets and are actively seeking the allocation of sites for housing by way of the emerging Local Plan, in recognizing that there is a shortage of suitable and available land. As such, redevelopment of a heavily underutilized, brownfield site for four houses is wholly justified on this basis and should be welcomed by the Council in actively supporting aspirations of the NPPF whilst reducing pressures on the Council to find additional land for housing. Notably, the proposals also include larger family units, which are specifically required again supporting the proposed density of the proposals on this basis.
- 4.17 The proposals have been informed by the Willow Road Grade II* listed trio of houses in Hampstead. This includes the incorporation of a recessed front doors next to parking, with entrances to the houses being relatively closed and clad in a vertical board. This makes the entrances clear and inviting, with the panelling providing screening for the cars and bins. The first floor level then comprises the primary living space, with large windows, with windows that are extruded to negate overlooking to neighbours. The glazing on all levels is expressed differently in helping to identify spaces. Bedrooms are located on the top floors, expressed with smaller individual windows. As such, the proposals adopt a design quality which is like a high-quality, listed building; significantly enhancing the existing outlook of the site and wider area. This is further illustrated within the submitted Design and Access Statement (page 41).
- 4.18 In terms of external appearance, the proposals incorporate a high-quality and contemporary design, which whilst different from the finish of most neighbouring properties, is considered to significantly enhance the existing outlook of the Site and the general design standard of the wider area. Indeed, it is noted that there are other houses which incorporate different design finishes in the immediate vicinity, including 75A Lower Higham Road whereby the proposals should not be precluded on this basis. Further, the proposals are not considered to cause any harmful impact to the wider appearance of the area, with no heritage sensitivities on, or near the site, including listed buildings or Conservation Areas, with the proposals set-back from the main street scene of Lower Higham Road. Notwithstanding, the design team have carefully considered the historic use of the site and area, with the proposals taking design cues from former, historic buildings. This includes the use of the gable elevations which are a direct reference to the form of the former Lord Nelson pub and other properties along the Lower Higham Road streetscene. The design also picks up historic references to listed buildings along Chalk Road and adopts the use of weatherboard, in relating to the scheme to its historic context through the design fabric. The form and massing then complements more recent housing in the immediate vicinity – ensuring that the proposals are in keeping with the surrounding area, whilst reinforcing a sense of place and identity. This actively supports the Core Strategy Policy CS20 which states that the Council will accord a high priority towards the preservation of its historic environment, particularly where this reinforces a sense of place. The design of the houses also ultimately supports the aspirations of Core Strategy Policy CS19 and the NPPF Paragraph 134 which specifically states that **significant weight should be afforded** to *'outstanding or innovative solutions which promote high levels of sustainability or help to raise the standard of design more generally in the area, so long as they fit in the overall form and layout of their surroundings.'* The proposals actively meet these policy objectives and are therefore justified on this basis.

- 4.19 Whilst it is noted that the final materials will be conditioned (as per the previous planning permission), the likely palette has been carefully reviewed and is illustrated on page 45 of the submitted Design and Access Statement. This includes the weatherboard profile and colours, alongside the circular glass blocks for the windows, which will ensure that the rooms in the houses are well lit and well insulated, whilst further enhancing the outlook of the site. It is considered that this mix of materials will create a high-quality and durable finish, ensuring the sustainable use of the site into the future (in accordance with the NPPF and Core Strategy).
- 4.20 In conclusion, the proposed massing and architectural design overall has been fully optimised on the site whilst responding and respecting the surrounding architectural and historic context. Overall, it is considered the design and massing is acceptable in accordance with local and NPPF policy.

Housing mix and tenure

- 4.19 Local Plan Policy CS14 sets out a requirement for a mix of houses across the Borough, with supporting text (paragraph 5.10.3) outlining a significant need for two and three-bedroom market housing. This is also identified in the latest Strategic Housing Market Assessment ('SHMA' 2017). As such, the proposals respond directly to this identified need – through the delivery of high-quality, family homes at a sustainable, brownfield site which is wholly supported by the NPPF and aims of the Core Strategy and should be welcomed on this basis.

Quality of accommodation

- 4.20 The Core Strategy Policy CS19 states that new development should be visually attractive, fit for purpose and locally distinctive. The Residential Layout Standards SPG2, also set out standards for room sizes (only bedrooms now apply), layout, privacy distances and garden areas. The houses have been designed in accordance with the standards set out under Table 1 of the SPG2, with a full breakdown/audit of the scheme provided on page 46 of the submitted Design and Access Statement. Notably, all the houses meet and exceed national space standards for three bedroom and two-bedroom dwellings and are all dual aspect; enabling passive ventilation from the prevailing wind, whilst making the most of the sun throughout the day.
- 4.21 Private amenity space is provided for all the houses in the form of gardens, which meet and exceed (for houses 1 and 4) the standards set out under SPG2 Table 2 (as summarised in Table 3.3 of this planning statement) and exceed national standards. All the gardens also meet the minimum depth requirements of 10sq.m for each dwelling. The gardens are accessed from the rear of the houses, in keeping with the contemporary nature of properties in the neighboring area. Whilst it is acknowledged that this is not directly in line with the guidance set out under SPG2(6), with regards to aspirations for housing to have direct access to amenity space it is noted that given the constrained nature of the site, this is not practical and would create Secure by Design issues which have been proactively designed-out of the proposals (as detailed at Paragraph 4.23 of this statement). As such, it is considered that the removal of direct access creates higher-quality dwellings, which are safe and secure for modern-day occupiers, which is indeed adopted in contemporary housing developments elsewhere in the area. The Residential Design Standards SPG is also somewhat outdated, having originally been adopted in 1996, whereby a degree of flexibility should be applied when assessing the wider benefits of the proposals (i.e., the creation of higher-quality accommodation). The amenity space and access provision is therefore considered appropriate.
- 4.22 All the units have been designed to meet M4(2) standards (Accessible and Adaptable Dwellings) in line with aspirations set out under Policy CS19 and SPG2 Table 1.
- 4.23 The design team have also carefully reviewed the feedback from the Kent Police Designing Out Crime officer on the previous planning application, with several design changes made to ensure that the units are of the highest standard in terms of security and surveillance for future occupiers and visitors. This includes making use of Secure by Design homes principles and specifications where possible, including for doors, windows,

and bikes stores; all side, rear and divisional fencing will be 1.8m tall with no climbable features on the outside; all front doors and rear door sets will be certified to PAS24:2016 with laminated glazing; the undercroft has been redesigned to make the front doors visible and less recessed, which will remove the possibility for a potential offender to hide in areas unobserved; the walkway and vehicle access route to the units will have an electronic automated gate and access control; and the walkways between the units have been removed, so that there is not the risk of an offender hiding in them. Alongside the high-quality design, these measures are considered a significant attribute of the proposals, supporting the Core Strategy Policy CS13 which sets out an aspiration to create safe and secure places to call home.

Neighbouring residential amenity incl. daylight and sunlight

- 4.24 Paragraph 123-part c of the NPPF states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 4.25 Core Strategy Policy CS19 states that 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. The design and layout of new residential development should also accord with the adopted Residential Layout Guidelines.
- 4.26 Due to the level changes and the enclosed nature of the site, there is very little overlooking from neighbouring properties. This includes The Brambles (located directly to the south-west corner of the site), whereby the windows on the eastside of this residential property are predominantly non-habitable rooms including the staircase and bathroom. The same applies to the Parish Hall directly to the east, whereby a flank wall directly faces the site. Notwithstanding, the proposed development has been carefully designed to ensure negligible impact on neighbours. Accordingly, the houses have been set-back from the boundary, with all windows of habitable rooms over 21 metres from any other habitable room window (in line with SPG2 Paragraph 18). This includes properties along Lower Highman Road, whereby a distance of over 40 metres is maintained, with over 30 metres separation to houses facing Osney Way. Windows are also located at the higher levels to ensure there is no overbearing impact or opportunity for overlooking between the proposed residential accommodation and neighbouring properties, with a 1.8 metre fence proposed to provide further screening. The proposals also adhere to the 90 degree "fields of view" principles set out under SPG2 Paragraph 20 and Figure 1. This is illustrated on pages 48 and 49 of the submitted Design and Access Statement.
- 4.27 Further, and in support of this planning application, a Daylight and Sunlight Assessment has been prepared by T16 Design Limited. The assessment evaluates the potential impact of the proposed development on the daylight and sunlight received by the neighbouring buildings. The neighbouring buildings tested include the Chalk Parish Hall and residential properties to the south and west of the site (located in Osney Way and Pirrip Close). Other neighbours do not have windows facing the site or are sufficiently far away as to not warrant assessment. Full details of the location of neighbours and their windows are included at Section 5.0 of the submitted Daylight and Sunlight Assessment and should be read alongside the summary provided herein.
- 4.28 In conclusion, the assessment found that all windows retain 80% of their current Vertical Sky Component ('VSC') value, therefore meeting the BRE recommendations in relation to daylight impacts. All windows also retain 25% of annual hours of sunlight and 5% available winter hours, or, where this is not the case, 80% of existing hours both annually and over the winter months. The neighbouring garden directly to the west (Brambles) retains more than 80% of current sunlight levels, receiving two hours or more direct sun on March 21st. The proposals are therefore considered acceptable in daylight and sunlight terms, especially in the context of this site being within a built-up urban location, and in the context of paragraph 123 of the NPPF noted above.

Transport

- 4.29 Chapter 9 of the NPPF sets out that in ensuring developments are sustainable they should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, address the needs of people with disabilities and reduced mobility in relation to all modes of transport, create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles, allow for the efficient delivery of goods, and access by service and emergency vehicles, and be designed to enable charging of plug-in and other ultra-low emission vehicles.
- 4.30 Paragraph 109 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. Paragraph 103 states that development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes
- 4.31 As part of the NPPF July 2021 update, Paragraph 108, it is stated that maximum standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimizing the density of development in city and town centres and other locations that are well served by public transport.
- 4.32 Within the Core Strategy, it is stated that currently Gravesham Council apply the Kent Vehicle Parking Standards (2006) (SPG4) in assessing development proposals. This sets out a requirement for a maximum of two spaces per dwelling. Therefore, for the four proposed dwellings comprising of one two-bedroom house and three three-bedroom houses, a maximum of eight parking spaces could be provided. However, within the pre-application response for the previous planning permission it was noted that the adopted standards would not normally be sought to be met in full, due to Kent County Council following the government on the abolition of maximum parking standards in 2011. In support of this planning application, a Transport Statement has been prepared by Paul Mews Associates. This includes an assessment of car ownership census data (2011) which concludes that four car parking spaces would be appropriate for the development proposals. However, an additional car parking space is proposed to ensure there is no overspill onto the local highway network. Therefore, the proposed level of car parking is considered to be in accordance with Kent County Council highway standards. One of the five spaces will also be provided with electric vehicle charging facilities, in line with officer feedback on the previous planning permission (ref: 20201379).
- 4.33 The report concludes that there will be no material change in the level of traffic because of the redevelopment, and therefore a negligible change in traffic flows on the local highway network. The proposals would therefore not result in a severe impact on the local highway network in terms of traffic capacity and highways safety.
- 4.34 With regards to cycle parking, Kent Cycle Parking Standards are minimum standards which set a requirement for one space per bedroom for individual residential dwellings. As such, a minimum of two cycle spaces should be provided for the two-bedroom house and a minimum of three cycle spaces for the three-bedroom houses. This equates to a minimum of 11 cycle parking spaces which are provided within a secure shed in the garden of each house. As such, the provision of cycle parking fully accords with the Council's minimum standards.
- 4.35 The existing access road will be retained for vehicle and pedestrian access into the Site with a shared surface forecourt. Pedestrians will take priority when using the pavement.
- 4.36 The refuse strategy will be as per planning permission reference 20201379; with residents placing their bins at the bottom of the driveway at the junction of Chalk Road to allow collection. This is considered appropriate as per the existing situation.

- 4.37 A Construction Traffic Management Plan has also been prepared by Paul Mews Associates, setting out the demolition and construction process for the proposed development. This includes the construction programme, methodology, vehicle routing and access provisions, and strategies to reduce impacts on the environment, neighbouring residents, and businesses. A monitoring and management strategy is also set out to ensure that this is properly considered from the outset.
- 4.38 Considering the above, it is considered that the proposals accord with the NPPF, Core Strategy, and Kent Parking Standards and should not be precluded on highways grounds.

Archeology

- 4.39 The Site lies within an area of low archeological potential whereby an Archeological Statement has been prepared by Wessex Archeology and submitted in support of this planning application. The findings of the report are as per planning permission reference 20201379 whereby the document notes that archaeological remains of the roman or medieval periods is expected to be limited. Therefore, there are no overriding archaeological constraints which should prohibit development.

SUDs and Drainage

- 4.40 Whilst the Site area and scale of the proposed development falls below the threshold requirement for a Flood Risk Assessment ('FRA'), this has been prepared in accordance with pre-application advice received for the most recent planning permission at the site, alongside a SUDs strategy. The report considers a wide range of flood risk sources and concludes that the risk to the proposed development is low and is therefore acceptable in line with the NPPF and local planning policies.
- 4.41 In terms of surface water drainage, the report recommends that this is managed via infiltration to the ground, with discharge via a public sewer recommended if this approach is not possible during detailed design stage. Again, this is considered appropriate.

Conclusions

- 5.1 This planning statement is submitted in support of a full planning application submitted to Gravesham Council for residential development comprising four new homes, including high-quality family accommodation with associated car parking, cycle parking, amenity space and landscaping.
- 5.2 This statement provides a comprehensive review of the national, strategic and local planning policy and guidance relevant to the proposals. It assesses the degree to which the proposals accord with the policies of the statutory development plan and considers other material considerations, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory tests for the determination of planning applications.

Benefits of the proposal

- 5.3 The development proposals ultimately provide much needed family housing for the Borough, which is specifically identified as being required by way of the most recent SHMA and Housing Monitoring Report. The presumption in favour of sustainable development must also be applied, in acknowledging that the Council have undelivered on their housing targets for the past three years and are unable to demonstrate a five-year supply of housing. In line with the justification set out in this statement, there is no overriding reason as to why planning permission should not be granted – in line with the NPPF Paragraph 11(d) 124 tests. Other key benefits are summarised below, which should be afforded significant weight alongside the presumption in favour of sustainable development:
- Delivery of high-quality homes at a heavily underutilised, brownfield site which will significantly enhance the existing outlook of the site to the benefit of the local area – in line with the priorities of the NPPF and Core Strategy policies.
 - Provision of housing which is in keeping with the form and urban character of the area, whilst creating a sense of identity and retaining Gravesham's historic legacy through the design detailing.
 - Making optimum use of previously developed land (which is not subject to any heritage or other technical sensitivities) in a Borough where suitable and available sites are scarce (as evidenced by the emerging Local Plan) – supporting the fundamental objective of the NPPF Paragraph 125 and recent Government incentives to increase the supply of homes at brownfield sites as a priority. This will also reduce pressures on the Council to find additional land for housing – including rural areas.
- 5.4 The proposal complies with Section 38(6) of the Planning Compulsory Purchase Act 2004 which states the determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Planning Statement has demonstrated that the proposal is in accordance with the broad aims of the development plan, and that where minor conflicts with policy do occur the significant range of benefits highlighted above are deemed to weigh in favour of justifying the conflicts. The proposal is therefore acceptable and planning permission should be granted without delay.