



PLANNING STATEMENT

Project Number:

2020-1398

Project:

Kesson House, Council Avenue, Northfleet, DA11 9HL

Proposal:

Demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 1x bedroom units for supported living use and overnight staff accommodation (Class C3b) Erection of 5 x 1 bed flats and 15 x 2 bed flats (Class C3a) in a separate block, hard and soft landscaping, parking spaces and cycle storage.

Date:

May 2024

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1. Introduction

- 1.1 This statement has been prepared in support of my clients' planning application. This is in relation to the demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 1x bedroom units for supported living use and overnight staff accommodation (Class C3b) Erection of 5 x 1 bed flats and 15 x 2 bed flats (Class C3a) in a separate block, hard and soft landscaping, parking spaces and cycle storage.
- 1.2 First this statement will set out the details of the site description to provide a context in which the proposal has been designed. Secondly, we review the sites planning history and set out the details of the proposal, subject of this application. Next, we provide a summary of the relevant national and local planning policies. Following this we set out a detailed assessment of the proposal and the relevant material considerations. Finally we provide a short conclusion.
- 1.3 In addition to this statement the following documents have been provided;

- Application forms
- Design and Access Statement
- Transport Statement
- Flood Risk Assessment
- Daylight and Sunlight Assessment
- Preliminary Ecology Survey
- Bat Roost Assessment
- Viability Appraisal

Drawings

- A-21251-P-00 001 – Site Location Plan
- A-21251-P 00 100 – Existing Site Plans and Demolitions
- A-21251-P 00 101 – Existing Basement Floor Plans
- A-21251-P 00 102 – Existing Ground Floor Plans
- A-21251-P 00 103 – Existing First Floor Plans
- A-21251-P 00 104 – Existing Second Floor Plans
- A-21251-P 00 105 – Existing Elevations Sheet 1 of 2
- A-21251-P 00 106 – Existing Elevations Sheet 2 of 2
- A-21251-P 00 200 – GA Ground Floor Site Plan
- A-21251-P 00 201 P7 – GA First Floor Site Plan
- A-21251-P 00 202 P7 – GA Second Floor Plan
- A-21251-P 00 203 P7– GA Third Floor Plan
- A-21251-P 00 204 P7 – GA Roof Plan
- A-21251-P 00 210 P7 – Landscaping Plan
- A-21251-P 00 211 P7 – Site Surface Finishes
- A-21251-P KH 220 P7 – Block A – GA Plans
- A-21251-P NB 221 P7 – Block B GA Ground and First Plans
- A-21251-P R01 222 P7 – Block B – GA Second and Roof Plans
- A-21251-P R01 223 P7 – Block C GA Floor plans
- A-21251-P ML 300 P7 – Block A Elevations
- A-21251-P ML 301 – Block B Elevations
- A-21251-P ML 302 P7 – Proposed Elevations Kesson House
- A-21251-P ML 303 P7– Proposed Street Scenes
- A-21251-P ML 304 P7- Proposed Street Scenes

2. Site Description

- 2.1 The site is located in a prominent position at the confluence of Council Avenue and East and West Kent Avenues, just south of High Street, Northfleet. The building was previously used as a 46 bed care facility (formally known as Kesson House). The former care home has been extended a number of times in the past, which have not been sympathetic to the design of the original building. The annex which is located to the west of the main building is located on the boundary with the adjoining site. The site area is irregular in terms of its shape, and shares a boundary with a number of other residential properties.
- 2.2 Due to changes in topography and an open site frontage, the site is clearly visible from within the street scene as shown in the street scene image below.



Figure 1: Existing street scene showing site frontage

- 2.3 The site is located within Northfleet, where a number of services and facilities are located on the High Street, approximately 300m to the east of the site. Amenities include take-away services, restaurants, a pharmacy, social club and barbers. In terms of recreational space, Northfleet Urban Country Park is located 700m to the south east of the site. Lawn Road Primary School is easily accessible and is located 150m to the north of the site.
- 2.4 Gravesend is located approximately 2.6km to the east of the site with Bluewater Shopping Centre located 4km to the south west of the site.
- 2.5 In terms of transport links, Northfleet train station is located 540m to the north west of the site and provides regular services to Rainham, Gravesend, Luton and Charing Cross. Ebbsfleet International is located 700m to the south west of the site St Pancras International, Margate, Faversham and Margate. In addition, there are two bus stops 100m from the site frontage which provide regular bus services to Gravesend, Dartford and Bluewater Shopping Centre. The site is therefore in a very sustainable location.
- 2.6 The site is located within the urban area and is not affected by any landscape constraints. The property is not listed and nor are there any other listed buildings within close proximity of the site.
- 2.7 Neighbouring development is wholly residential and principally comprises terraced and semi-detached dwellings. Development in this area is fairly dense with properties set within relatively modest plots. External building materials predominantly comprise white painted render and brickwork.

3. Planning History and Proposal

Planning History

- 3.1 Planning permission was granted in March 1990 for change of use of former Town Hall & ground floor annexe from offices to nursing home for the elderly incorporating two storey rear extension; erection of a lift tower in the main building, a linked covered walkway & laying out of 18 no car parking spaces & formation of garden area at rear under ref 19900042.
- 3.2 The Case Officer concluded within their report that *'In planning terms I am satisfied that the scheme is a beneficial use of the buildings and grounds and in general presents a more acceptable layout with additional amenities for the area than does its established use as offices.'*
- 3.3 Planning permission was subsequently granted for the erection of first floor extension at the rear to form lounge in August 1992 under reference 19920424.
- 3.4 More recently pre-application discussions have taken place with the LPA to discuss the redevelopment of the site.

Planning Proposal

- 3.4 Planning permission is sought for Demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 1x bedroom units for supported living use and overnight staff accommodation (Class C3b) Erection of 5 x 1 bed flats and 15 x 2 bed flats (Class C3a) in a separate block, hard and soft landscaping, parking spaces and cycle storage.
- This proposal would include the conversion of the existing Kesson House into 9 x 1 bedroom supported living apartments plus staff accommodation which would include a flat to allow for 24 hour care.
 - The supported living units would be managed by registered provider Voyage Care.
 - Occupiers of the supported living units would be registered as individual tenants with the aim of living as independently as possible whilst still have access to care. Occupiers can opt into various levels of care, depending on their specific needs.
 - The redevelopment of Kesson House aims to restore its original design and bring it back into use. Kesson House would be sensitively extended to the rear to enable the provision of the supported living units.
 - The proposal seeks to remove the newer 1950s extensions which are not sensitive to the original design of Kesson House. In order to make efficient use of the land it is proposed to develop 20 flats where the extensions are currently located.
 - Blocks A and B would comprise a mix of 2, 3 and 4 storeys and provide 15 x two bedroom flats and 5 x one bedroom flats.
 - Shared amenity space would be provided within the site. Landscaping would be provided to enhance the setting of the new development.
 - The two existing vehicular accesses would be retained.
 - 21 parking spaces, 6 motorcycle and 10 cycle spaces would be provided throughout the site. Two visitor parking spaces would be provided close to the site entrance.
 - Refuse and recycling storage points would be provided within the site.
 - Solar PV Panels would be provided within the roofspace of both Kesson House and Block B to reduce carbon emissions.



Figure 2: Proposed elevations of Kesson House and Blocks A and B

3. **National Planning Policy**

National Planning Policy Framework 2023

- 4.1 The NPPF sets out the government's planning policies which Local Plans need to accord with. Relevant paragraphs include;

Achieving Sustainable Development

- 4.2 Para 7 of the NPPF states that 'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.'
- 4.3 Para 8 states that 'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a. **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b. **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c. **An environment objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Presumption in favour of sustainable development

- 4.4 Para 11 of the NPPF states that 'plans and decisions should apply a presumption in favour of sustainable development.'
- For decision-taking this means:
- c. Approving development proposals that accord with an up-to-date development plan without delay; or
 - d. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. The application 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 in this Framework taken as a whole.

Making effective use of the land

- 4.5 Para 119 of the NPPF states that 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the

environment and ensuring safe and healthy living conditions. 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.'

Achieving well-designed places

- 4.6 Para 131 relates to achieving good design and states that 'the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development acceptable to communities.'
- 4.7 Para 135 continues to state 'Planning policies and decisions should ensure that developments:
- a. 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;
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c. 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);
 - d. 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;
 - e. 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; and
 - f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

5. **Local Planning Policy Summary**

Gravesham Local Plan Core Strategy – 2014

5.1 The Core Strategy was adopted in September 2014 and sets out the Councils long term spatial vision for the Borough. The Core Strategy covers the period from April 2011 to March 2028.

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density
- Policy CS16 – Affordable Housing
- Policy CS19 – Development and Design Principles

5.2 Policy CS01 relates to sustainable development and 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.

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.

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.*

Gravesham Local Plan First Review Saved Policies – 2014

5.3 The Local Plan was originally adopted in November 1994. In September 2007 a number of policies were saved through direction from the Secretary of State. In September 2014 the Council adopted their Core Strategy and as a result a number of saved policies were deleted. The remaining saved policy is relevant to this proposal are as follows;

- Policy P3 – Vehicle parking standards

Site Allocations and Development Management Policies

5.4 A second regulation 18 consultation was carried out between October and December 2020. No further consultations have been carried out since this time. It is understood that there have been delays to the progression of the Emerging Plan due to highways modelling. As a result, we consider that the policies contained within the emerging local plan hold very limited weight and have therefore not been referenced here. Planning Assessment

6. Planning Assessment

Principle of Development

- 6.1 Local Plan Policy CS02 relates to scale and distribution of development and sets out the Boroughs objectively assessed housing need for the period 2011-2028 as at least 6,170 new dwellings delivered at a varying rate of between 324 dwellings per year to 438 dpa over years 2011-2028. The housing requirement gradually increases during the plan period to provide a scaled increase in housing supply across the Borough.
- 6.2 Paragraph 74 of the NPPF requires that an LPA's five year housing land supply should be set against the strategic requirement as set out in the adopted strategic policies or against a local planning authority's local housing need figure as set out in the Government's Standard Method, where the relevant policies are more than five years old. As Gravesham's Local Plan was adopted in September 2014, it is now more than five years old and therefore the Standard Method, as set out in the Government's Planning Practice Guidance provides the basis for the Councils housing need.
- 6.3 When taking into account a 20% buffer (due to persistent undersupply) the Councils annual housing requirement totals 848dpa. This is significantly higher than the housing requirement figures as set out within the adopted Local Plan. As set out within the Councils latest Five Year Housing Land Supply Statement 2022-2027 (dated March 2023), there is a significant shortfall in the Councils housing supply of 1,785 dwellings. As a result, the Council are only able to demonstrate a 2.9 year supply of housing. The emerging Local Plan is some way from being adopted and as a result, it is likely that windfall developments will be required to reduce the shortfall in housing need.
- 6.4 Policy CS02 seeks to prioritise development in the urban area as a sustainable location for development. The policy aims to achieve this by '*promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area.*'
- 6.5 A recent appeal decision dated 6 February 2024 (ref APP/K2230/W/23/3318724) related to the erection of two 1 bed flats on a site in Gravesend. Whilst this appeal was dismissed on design and character grounds, when assessing planning balance the Inspector noted that '*the Council cannot demonstrate a five-year supply of deliverable housing sites and past delivery of housing was below 75% of that required by the Housing Delivery Test. The evidence before me suggest there is a substantial shortfall in housing supply in the area. Consequently, because of the provision of footnote 8, paragraph 11d) of the Framework should be applied.*'
- 6.6 The site is located within the urban area and comprises the redevelopment of the existing site to provide supported living units and market housing. The site is located within a residential area where such uses are considered to be appropriate. On this basis, we consider that the proposal is acceptable in principle. Furthermore, the proposal would provide additional residential dwellings which would contribute towards the Council's significant housing supply shortfall.

Sustainable Location

- 6.7 Core Strategy CS02 relates to the scale and distribution of development and '*prioritises development in the urban area as a sustainable location for development.*' The site is located within the urban area and therefore is considered to accord with the aims of this policy.
- 6.8 In terms of transport links, the site is within easy walking distance of two bus stops on the B2175 (High Street) which provide regular services to Bluewater Shopping Centre, Dartford and Gravesend via bus route numbers 480 and 490. To the north-west lies Northfleet train station which provides regular services to Gravesend, Rainham, Luton and London Charing Cross. Ebbsfleet International is located to the west of the site which provides regular rail services to London St Pancras, Margate and

Ramsgate. Therefore, in terms of transport connections, the site is considered to be in a very sustainable location.

- 6.9 In addition, the site is well located in terms of amenities and services which are all located in close proximity to the site as detailed in the table below.

Service/Amenity	Proximity to site
Education	
Little Explorers Kindergarten and Nursery	360m
Lawn Road Primary School	160m
Ebbsfleet Academy	1.3km
Northfleet Technology College	1.3km
Retail	
Costcutter	330m
Premier (convenience store)	540m
Sainsburys	1.5km
Aldi	1.6km
Bluewater Shopping Centre	4km
Restaurants	
Ye olde Coach and Horses Inn	260m
White Eagle	260m
Leisure and Recreation	
Saint Botolph Church	200m
Northfleet Urban Country Park	730m
Ebbsfleet United Football Club	875m
Swanscombe Marshes	1.62km

- 6.10 Taking the above into account, we consider that the proposal for new residential development would be appropriate in this location taking into account its position within the urban area and its proximity to services and facilities. On this basis, we consider that the proposal would accord with Core Strategy Policy CS02.

Housing Mix and Density

- 6.11 Local Plan Policy CS014 relates to housing type and size and states that '*sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.*' As set out within the planning history, the site has previously been used as a care home for elderly residents. Supported living units provide an alternative care option compared to the previous use, however the principal of a care use in this location, we consider remains appropriate. Whilst this use has since ceased, we consider that the site remains appropriate for the use of supported living units.
- 6.12 The proposal includes the provision of 9 supported living units which would be managed by Look Ahead a specialist supported living operator and provider. Supported living offers an alternative to residential care and empowers people to choose the right amount of support for them, including how and when they need it, so that they can lead an enriching and fulfilling life. The aim of supported living is to achieve choice, control and community inclusion for individuals who are able to live independently with some support. People in supported living are tenants who have their own tenancy agreement, and security of tenure, with a specialist registered housing provider. In specialist supported living developments the need for support is a requirement to obtain a tenancy.

- 6.13 Tenants will be in receipt of enhanced housing benefit. All tenancies are arranged with a housing provider who has overall responsibilities for housing management services in the development and supports each individual tenant to manage their tenancy. No properties are let separately/privately, and the properties are not available to purchase. All 9 units are 1 bedroom, over which the tenants have exclusive possession. The units include a bathroom and open plan kitchen/living/dining area. In addition, limited staff accommodation would be provided which would include an office. Staff will be on site 24 hours a day.
- 6.14 The care and support can be continuous or periodic but is always tailored to meet the supported person's individual needs. It enables people who need personal care to live as independently as possible in accommodation that is generally 'their own'. Support is typically provided to individuals on average for a minimum of 60 hours per week per person but, dependent on their needs, support can be provided round the clock.
- 6.15 Policy CS14 also states that *'the Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.'*
- 6.16 Blocks A and B would provide 20 new residential units 5 x one bedroom and 15 x two bedroom apartments. We consider that this would be an appropriate mix of dwellings alongside the supporting living units.
- 6.17 The supporting text of Local Plan Policy CS15 which relates to density states that; *'the density of housing can have an impact on local character and distinctiveness. The Council wishes to ensure that land is used efficiently but this needs to be balanced with delivering the right type of housing to meet the needs of the whole community in the right location.'* The supporting text goes on to state that *'it is important that the densities sought do not adversely affect the quality and character of an area and the general well-being of residents. The appropriate density will be design led and will have regard to the accessibility of each site. Therefore appropriate densities will vary across the Borough. A minimum density of 40 dwellings per hectare will be sought in the urban area.'*
- 6.18 Taking into account the 9 supported living units and staff accommodation, the proposal would result in a density of 97.9dph. The previous care home provided 43 single bed spaces over a floor area of 1,533m². As a result, whilst the proposed density appears relatively high (numerically) given the urban location of the site and the previous number of care home bed spaces, we consider that the proposal would provide an appropriate density. Taking this into account we consider that the proposal would accord with Policy CS14 in terms of housing mix and density.

Affordable Housing

- 6.19 Core Strategy Policy CS16 relates to affordable housing and requires on schemes of 15 or more dwellings to provide 30% affordable housing. The proposal would include the redevelopment of the site to provide 30 residential units 10 of which would be transferred to Look Ahead Housing for use as affordable rented accommodation for local people. On this basis we consider that the proposal exceeds the Council's requirements in terms of meeting affordable housing needs.

Visual Amenities

- 6.20 Policy CS19 relates to development and design principles and states that *'new development will 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 and 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.'*

- 6.21 Kesson House sits in a prominent position within the street scene and as a result is highly visible. This proposal seeks to demolish the 1950's extension which are not sympathetic to the character of the original Kesson House. This proposal seeks to restore and enhance the original building. The proposed new insertion and retained fabric has been detailed to read as an infill, organically situated with each existing 'bookend development'. The proposal presents a well organised active frontage in stark contrast to the existing fractured and poorly defined one. The relationship between the classical 'Kesson House' and the new proposed building improves the local urban grain, replacing the fragmented frontage with a proposal which bridges the grandeur of the mansion house with the mass and form of the existing surrounding purpose built housing.
- 6.22 Landscaping would be provided within the site to enhance the setting of the proposed development and provide high quality amenity space for future occupiers. Proposed landscaping is shown in the CGI image below.



- 6.23 As a result of the carefully thought out design we consider that the proposal would have a positive impact upon the character of the street scene and would enhance the wider area. On this basis we consider that the proposal would meet with the requirements of Local Plan Policy CS19.

Residential Amenities

- 6.24 Local Plan Policy CS19 sets out development and design principles including those relating to residential amenities and 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.*'
- 6.25 The site shares a boundary with a number of neighbouring residential properties and as such the proposal has been carefully designed to take account of the amenities of neighbouring properties.

4-20 East Kent Avenue

- 6.26 The extension to Kesson House would not bring development any closer to the boundaries of properties 4-20 East Kent Avenue. As a result, the development would not result in a loss of light, outlook or privacy to these neighbouring properties. Whilst additional parking spaces would be provided, the existing access arrangements would remain unchanged. Given the size of the previous care home we consider that there would be no increase in noise and disturbance to neighbouring properties.

10-14 North Kent Avenue

- 6.27 Due to proposed separation distances, we consider that the development would not have an adverse impact upon the amenities of this property in terms of loss of light, privacy, outlook or increase noise and disturbance.

16 West Kent Avenue

- 6.28 The existing annexe is built on the site boundary with the shared vehicular access which runs between the site and the neighbouring property at 16 West Kent Avenue. This proposal would involve the demolition of the existing annexe and the provision of 20 flats in a similar position. The proposed flats would be set back from the site boundary and would be split into two blocks. On this basis, we consider that the proposal would have no greater impact upon the amenities of the neighbouring property at number 16.
- 6.29 The proposal would incorporate the provision of balconies to each 2 bedroom unit. Screening would be provided to ensure that these balconies would not have an adverse impact upon the amenities of existing or future residential occupiers. In addition, as shown in the CGI image below, areas of communal open space would be provided within the site.



- 6.30 Refuse and recycling areas are proposed to the west of Block B within the communal area adjacent to the building and to the south east of Kesson House. These would be located to provide easy access by residents and refuse collectors. The refuse area would be screened with a timber roof pergola. On this basis, we consider that the proposal would not have an adverse impact upon the residential amenities of future occupiers and neighbouring residential properties.

Highways and Parking

- 6.31 Core Strategy Policy CS11 relates to transport and states that;

'New developments should mitigate their impact on 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. Transport assessment work is required to be undertaken in accordance with national and local policy guidance and to identify detailed highway and public transport network requirements and management arising from the development.'

- 6.32 A Transport Statement has been prepared by consultants Richard Jackson which confirms that;

- A number of local amenities, including primary education, lie within walking or cycling distance of the site. The local amenities can be reached via a network of existing footways and cycleways.
- The nearest bus stops are located within 150m of the development and provides regular services to Gravesend, Dartford and Bluewater Bus Station.
- For travel by private car, Gravesend, Dartford and further locations such as London and eastern Kent can be reached.
- The review of local highway safety records found no significant reoccurring issues, casualties or locations of accidents. The development is considered unlikely to have a disproportionate impact on local highways safety.
- Multi-modal trip generation for the current proposals has been reviewed and considers the level of trip generation from the development to not cause a detrimental impact on the highway network and is also suitable for the sites T-Junction access proposals.
- The expected construction traffic has been considered with construction vehicles likely to use the B2175 and Council Avenue to/from the development. A Construction Management Plan has however been identified to help manage traffic movements during the construction period.

6.33 Core Strategy Policy CS11 states in relation to parking provision that;

'Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.'

6.34 In order to encourage future occupiers of the development utilise sustainable modes of transport, 10 cycle spaces are proposed to be installed within communal areas. These areas of cycle storage will provide secure spaces for the storage of bicycles. These cycle spaces will serve the occupiers of the supported living units and those within the market housing. In addition, 23 car parking spaces would be provided along with 6 motorcycle spaces, which has been designed in accordance with KCC guidance. Emerging Policy INF5 requires the provision of electric vehicle charging points. Three spaces across the site are proposed to be provided with electric vehicle charging points in accordance with Emerging Policy INF5.

Biodiversity

6.35 Strategic Objective 16 of the Core Strategy seeks to *'safeguard and enhance the biodiversity of the borough'* Policy CS12 relates to green Infrastructure and states that *'sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designed Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.'* This policy goes on to state that *'there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.'*

6.36 Arbtech have carried out a Preliminary Ecological Appraisal of the site comprising a desk top study and Phase 1 Habitat Survey, together with an assessment of impacts at this site. This confirmed that the site is not subject to any designation and there are no known statutory sites nearby. In terms of protected species, no further surveys were considered necessary in relation to reptiles, amphibians, badgers or dormice. An initial bat roost assessment has confirmed that building 1 was considered to have moderate value for bat roosting potential. As a result, two bat surveys have been recommended and are scheduled to be carried out during May and June 2024. A biodiversity net gain assessment has been carried out which has concluded a net loss. Offsite credits will therefore need to be purchased to ensure that biodiversity net gain can be achieved.

- 6.37 On this basis, we consider that the proposal would not have an adverse impact upon protected habitats or species such that the development would accord with Policy CS12. On-site mitigation can be provided to ensure that the proposal would result in a biodiversity net gain.

Heritage

- 6.38 The site is not located within a conservation area or within the setting of a listed building. The original building was built circa 1842 and is an attractive and prominent feature within the street scene. The building makes a positive contribution to the setting of the street scene and as a result, this proposal has been designed to ensure that the original building is retained and enhanced. Whilst the existing annexe and previous extensions are proposed to be demolished as part of this proposal, these are much later additions to the main house and do not provide a positive contribution to its setting, as shown in the streetscene image below.



- 6.39 It is considered that these later additions were not sensitively designed and therefore the removal of these structures is considered to result in a positive impact upon the setting of the original property.

Sustainable Construction

- 6.40 Local Plan Policy CS18 relates to climate change and sets out within the supporting text that '*The Core Strategy seeks to reduce greenhouse gas emissions through the appropriate location and design of future development in the Borough. The NPPF requires local planning authorities to support energy efficiency improvements to existing buildings and to take into account the Government's zero carbon buildings policy and national standards when setting local requirements for building sustainability. The aim is to move towards zero carbon development and to reduce the overall carbon footprint of the Borough.*'
- 6.41 Policy CS18 confirms that the Council will '*support other proposals which lead to a reduction in carbon footprint.*' The reduction of carbon emissions has been given full consideration as part of this proposal. In line PV Solar Panels are proposed to be installed within proprietary trays to the south facing faces of pitched roofs to Block B. PV Solar Panels are also proposed to the roofspace of Kesson House.

Flood Risk and Drainage

- 6.42 A site specific flood risk assessment and SUDs assessment has been prepared by Richard Jackson Engineering Consultants and submitted in support of this application. This confirms that the site is located in Flood Zone 1 and where residential development such as that which is proposed is considered to be appropriate. A sequential approach and exception test are not therefore necessary.
- 6.43 Local Plan Policy CS18 states in relation to sustainable drainage and surface water run-off that;
'The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:
- *Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and*
 - *Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.'*
- 6.44 Permeable paving is proposed for all road and parking areas within the development to treat and attenuate all road run-off. Most of the proposed paving falls towards the centre of the road to aid in water collection and is on a typical 1 in 100 crossfall. The permeable paving would infiltrate water directly into the ground with the exception to areas of paving within 5m of a building, which are lined with an impermeable geomembrane to prevent infiltration in accordance with KCC Design Guide.
- 6.45 Surface water storage areas are also proposed within the roof to Blocks A and B, the roof of Kesson House and balcony areas/raingardens. The surface water strategy which has been designed will appropriately accommodate all associated flows for up to a 1 in 100 year (1.0% AEP) plus 45% climate change event in accordance with KCC LLFA guidance.
- 6.46 On this basis, we consider that the proposal would not have an adverse impact upon flood risk or surface water flooding and would be in accordance with Policy CS18.

7. Conclusion

- 7.1 Planning permission is sought for the demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 1x bedroom dwellings for supported living use and staff accommodation including 1 x warden flat. Erection of 18 flats in a separate block, hard and soft landscaping, parking spaces and cycle storage.
- The site is located within a sustainable location within the settlement boundary of Gravesham and comprises a brownfield site. The LPA cannot currently demonstrate a five year housing land supply and therefore in principle we consider that the proposal is acceptable in principle.
 - Whilst the proposed density is high, we consider that this is appropriate in this location.
 - By demolishing the former unsympathetic extensions to Kesson House and restoring the original character of this property, we consider that the proposal would have a positive impact upon the character of the street scene.
 - Due to the siting, scale and size of the proposed development there would be no adverse impact upon the amenities of neighbouring properties in terms of loss of light, outlook or privacy.
 - The development would not result in an adverse impact upon highways safety or lead to capacity issues.
 - The proposal would not result in an increase in flood risk.

The scheme accords with the NPPF (2023), Policies CS01, CS02, CS14, CS15, CS16 and CS19 of the Core Strategy. We respectfully request that planning permission is granted.