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Planning Statement

**Land To The West Of Nursery Mews,
Gravesend, Kent**

October 2024



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Project Name: Gravesend

Location Land To The West Of Nursery Mews
Gravesend

Client: Hyde Housing Association

File Reference: P2037i

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1. Introduction

- 1.1. This Statement has been produced by **ECE Planning**, on behalf of Hyde **Housing Association** ('the Applicant') in support of a Full Planning Application for the following development relating to the Land to the West of Nursery Mews, Gravesend, Kent ('The Site'). The description of development is as follows:

'Erection of 6no. affordable residential dwellings, emergency access / pedestrian / cycle route with associated parking and landscaping'.

- 1.2. The Applicant has previously undertaken Pre-Application discussions with Gravesham Borough Council which resulted in a response dated 31 August 2023 (reference PRE20230194). Following the feedback from the meeting and written response, amendments have been made to the scheme to address the comments received.
- 1.3. It should be noted that the pre-application feedback was for 2no. different options including a larger scale scheme. This is explored in detail within this Statement and the Pre-Application response can be found at **Appendix A**.
- 1.4. The proposals are for 100% affordable dwellings. The Applicant is unable to enter into a Section 106 agreement for this scheme, as this will affect the grant funding which the Applicant has secured from Homes England. However, Hyde Housing, as a well-known Registered Provider, is committed to delivery of this form of housing in perpetuity.
- 1.5. This Statement considers the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and an assessment of relevant planning conditions.
- 1.6. The proposals of the site have been informed by local and national planning policies including the National Planning Policy Framework, the Planning Policy Guidance, Gravesham Local Plan Core Strategy (2014) and the Saved Policies in the Gravesham Local Plan First Review (1994).
- 1.7. The proposals for Full Planning Permission should be considered with full regard to the following suite of supporting documents, drawings and plans:
- Planning Application and Notice Forms
 - Planning Statement
 - Location and Block Plans
 - Proposed Floorplans, Elevations and Roofplans
 - Design and Access Statement
 - Noise Assessment
 - Highways Note
 - Tree Constraints, Tree Protection Plan, Arboricultural Impact Assessment and Arboricultural Method Statement
 - Ecology Walkover Survey, Biodiversity Net Gain Metric Report and Calculation
 - Landscaping Scheme
 - Drainage Strategy
 - Lighting Report

2. The Site

- 2.1. The application site itself is located within the Built-Up Area Boundary and consists of areas of vacant and unused hardstanding. As such the site is brownfield land. The site is located to the east corner of an existing housing development. The site is 1160m² in area (excluding the access to the site) and is has a flat topography.

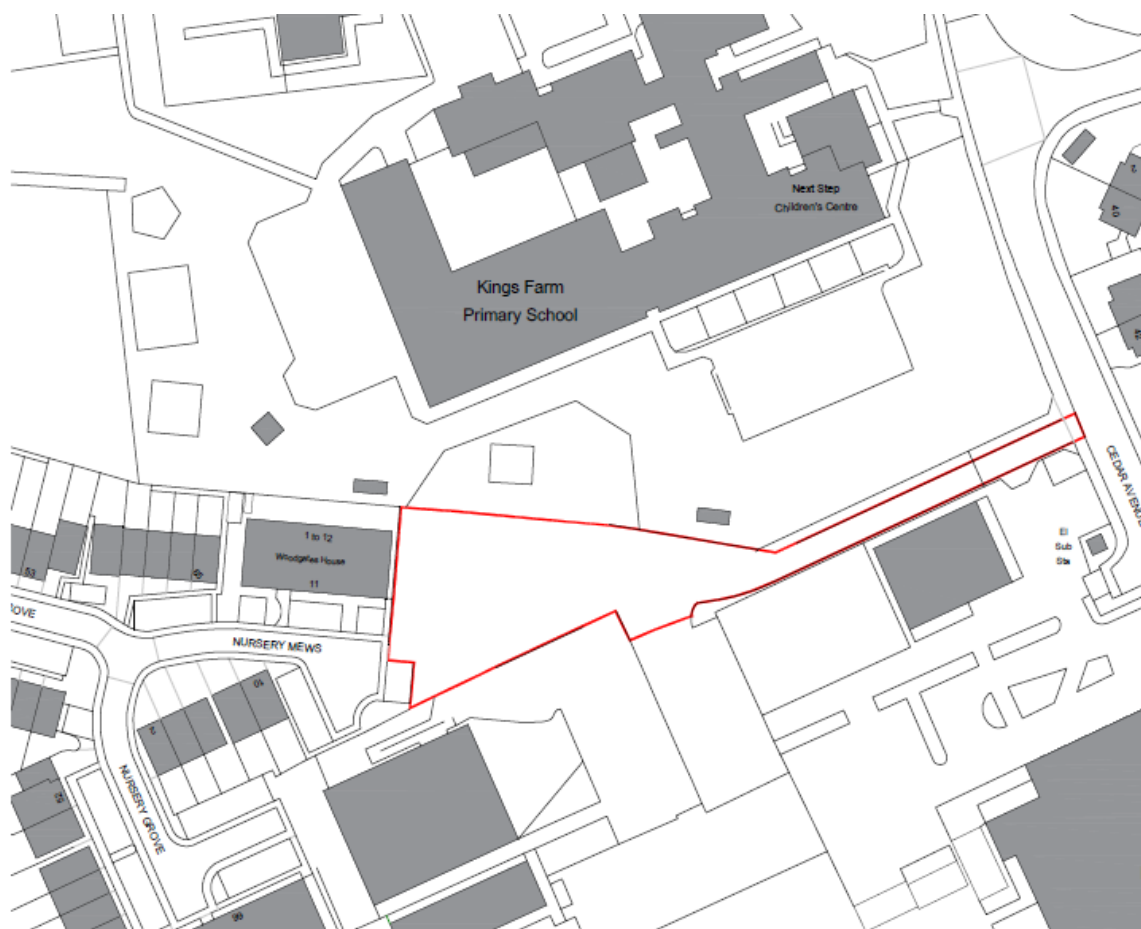


Figure 1- The Site (Red Line)

- 2.2. The site was originally retained for provision of a day nursery associated with the residential scheme planning reference: 20040814 but the requirement for the day nursery was removed by planning approval reference: 20110236 (considered further in the Planning History section). The area has since been unused and is known as an area for antisocial behaviour.
- 2.3. The site has, over the years, been boarded up / fenced off to prevent access by members of the public. A cycle / pedestrian link through the site has also been closed off by fencing, hoarding and concrete blocks making pedestrian / cycle and emergency access impossible from Nursery Mews in the west to Cedar Avenue in the east. As such the emergency access and pedestrian / cycle path permitted under 20070516 was never fully implemented.
- 2.4. The existing development to the west comprises of a mix of two and three storey terraced houses, and three storey blocks of flats, as well as some detached and semidetached two storey houses. Directly adjacent to the site in the west is a three-storey block of flats. There are two schools near the site; King's Farm Primary School sits directly adjacent to the site along the north boundary, and Ifield School is located to the southeast of the site.

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Figure 2: Site and Surrounds

- 2.5. To the south of the site is the Meapa Gymnastics Club, a local football pitch and associated clubhouse. Connected with these buildings are two car parks, one used by the Gymnastics Club, and one used by the football ground.
- 2.6. The site is located within 6km of the Thames Estuary and Marshes Ramsar Buffer Zone. Please refer to Figure 3 below.



Figure 3- SAMMS 6k Buffer Zone Map

- 2.7. The site is within Flood Zone 1 and therefore has a low probability of flooding from tidal and fluvial sources. Please refer to Figure 4.

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Figure 4- Governments Flooding Maps for Planning

2.8. The Site has a low risk to surface water flooding (Figure 5).

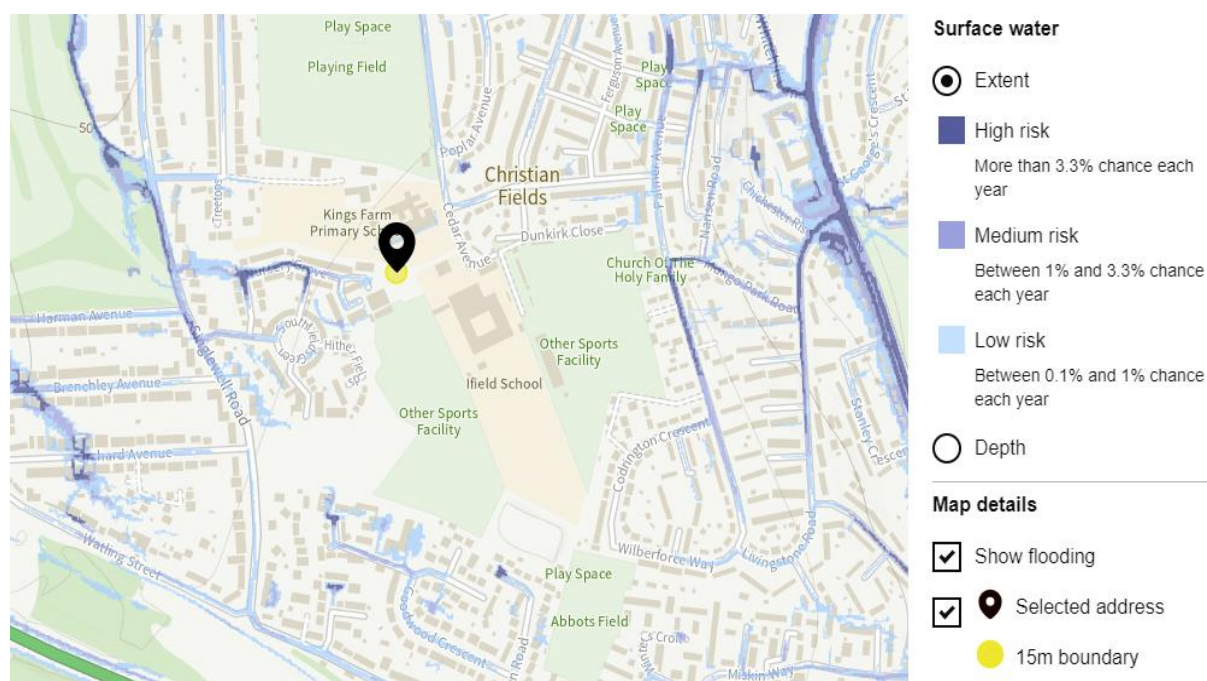


Figure 5- Governments Flooding Maps for Planning (Surface Water)

- 2.9. The site is well located for recreational space and public open space, including Hever Farm recreational area, Cyclopark, local playing fields and Mid Kent Golf club
- 2.10. The application site is in a highly sustainable location and sits 1.7 miles to the south of Gravesend station, which has direct links to central London stations in under an hour. The site also benefits from close road links to the A2 with ongoing connections to the central London and east into Kent.

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3. Planning History

3.1. Planning Applications – The Site

- 3.1.1. The following summary is considered to be the most relevant planning history pertaining to the site and the proposed development.
- 3.1.2. **Outline planning permission (GR/2004/0814)** for the site was granted on 13 August 2005 for residential development and for community uses including a nursery. The permission was subject to a number of conditions, including Condition 24 which required the submission of a strategy for community facilities with the provision of a pre-school nursery.
- 3.1.3. **A Reserved Matters/Approval of Details application (GR/2007/0516)** followed the Outline Permission and included Condition 14 which required submission of full details, plans and elevations of the day nursery and supporting carpark. Permission was later granted (GR/2010/0044) for the variation of Condition 14 in order to defer provision of the day nursery to enable all remaining phases of the development to be undertaken.

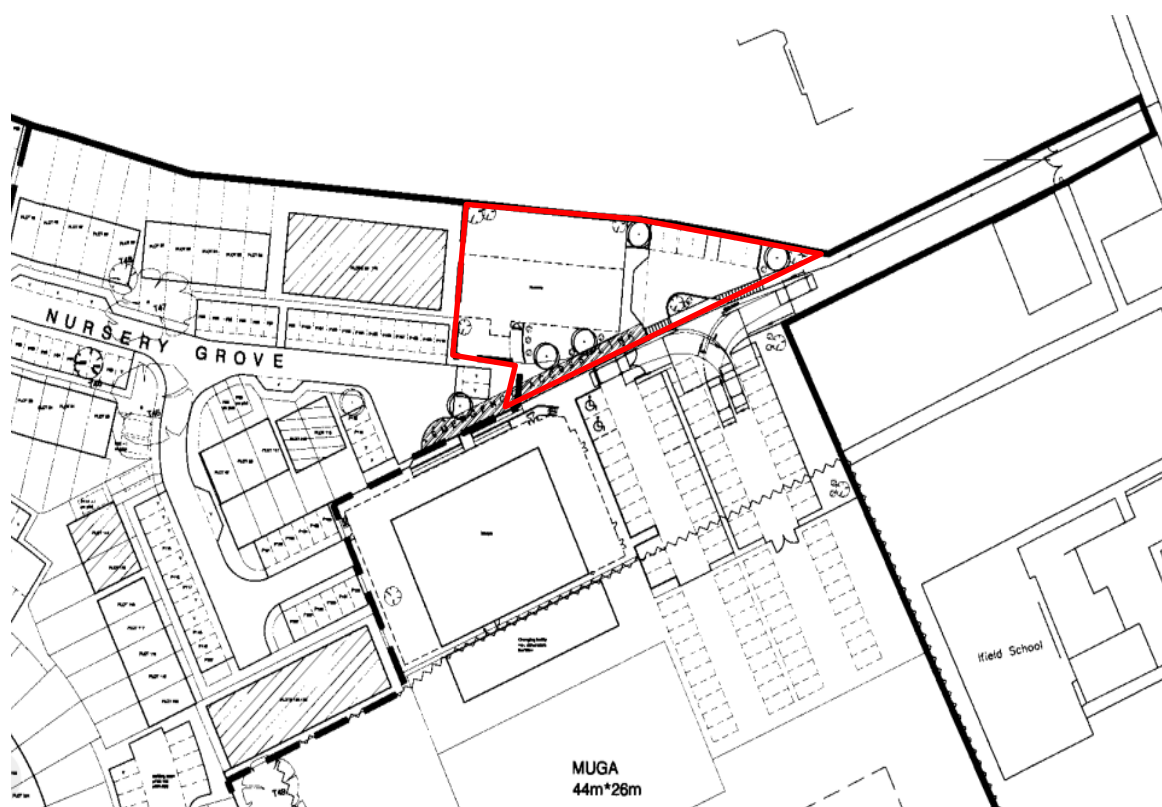


Figure 1 - GR/2007/0516 Approved Masterplan (Site Outlined in Red)

- 3.1.4. **A Section 73 application** was then submitted to remove reference to the provision of a Day Nursery in Conditions 24 and 14 (and 10 of GR/2010/0044) of the above permissions, removing the requirement for a Day Nursery at this location.
- 3.1.5. The details of the relevant permissions are listed below:

Reference GR/2004/0814 – Outline Application for residential development for up to 210 residential units and for community uses including nursery, open space with changing facilities and car parking; alterations to existing access to Singlewell Road between numbers 306 and 322 Singlewell Road; use of vehicular access from Cedar Avenue to provide access to recreation facilities at Former Southfields School, Singlewell Road, Gravesend, Kent DA11 7RF – **Application Permitted 13 August 2005.**

Reference GR/2007/516 - Details pursuant to outline planning permission reference no. GR/2004/814 relating to the siting, design, external appearance and landscaping for phases 2 and 3 of the development for a total of 134 residential units and comprising the erection of 16 detached two storey two, four and five bedroom dwellings some with detached or attached double garages; 5 pairs of two storey semi-detached two and three bedroom dwellings; 5 two storey terraces totalling 25 two bedroom dwellings and a two storey terrace of 5 two bedroom and 2 three bedroom dwellings; a semi-circular three storey terrace of 11 three bedroom dwellings with studies; a semi-circular three storey terrace of 5 three bedroom dwellings with studies and 8 two bedroom and 4 one bedroom self-contained flats; a three storey terrace of 12 two and three bedroom self-contained flats; 2 three storey buildings to provide a total of 18 two bedroom and 6 one bedroom self-contained flats; erection of a part three storey and part two storey building to provide 9 two bedroom and 3 one bedroom self-contained flats; formation of associated estate roads and laying out of associated car parking spaces; erection of a single storey building for sports changing facilities, provision of multi-use games area (MUGA) and laying out of associated car parking at Southfields School, Singlewell Road Gravesend Kent DA11 7RF – **Application Permitted 10 October 2010.**

Reference GR/2010/0044 - Application for variation of conditions 12, 13, 14 and 15 of reserved matter planning approval reference 20070516 pursuant to outline planning permission 20040814 to allow the multi-use games area (MUGA) (condition 12), the playing pitches and community changing facilities (condition 13), the day nursery (condition 14) and the car parking to support the sports facilities including the replacement car parking for the Meapa gymnastics club (condition 15) all to be provided and available for use before the first occupation of any of the units within phase 3b of the development approved– **Application Permitted 19 November 2011.**

Reference GR/2011/0236 - Application for removal of:- 1. The reference in Condition 24 attached to Outline Planning Permission reference GR/20040814 to the location, design, layout and ancillary car parking for a Pre-School Nursery and, unless otherwise agreed in writing by the Local Planning Authority, to a size as indicated in the illustrative proposals of 600m² ;and 2. Removal of Condition 14 attached to a Planning Permission reference number GR/20070516 relating to the requirement to submit for approval the plans and elevations of a Day Nursery, together with plans of the supporting car parking and associated landscaping and boundary treatments and to provide and make available for use the said Day Nursery; and 3. Removal of Condition 3 attached to Planning Permission reference number 20100044 also relating to the requirement to submit for approval plans and elevations of the Day Nursery, together with plans of the supporting car parking and associated landscaping and boundary treatments and to provide and make available for use the said Day Nursery– **Application Permitted 16 December 2011**

3.2. Pre-Application Advice (PRE20230194)

- 3.2.1. As briefly set out within Section 1 of this Statement, pre-application advice was sought from the Council for a larger scale scheme, as set out below.
- 3.2.2. Reference PRE20230194. Proposal for two options: 7 x two bedroom house terrace or 4 x one bedroom flats and 4 x two bedroom houses at Land To The West Of Nursery Mews, Gravesend, Kent.

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3.2.3. In summary, the Council summarised within the Pre-Application response that,

The proposed development would be acceptable in principle.

'Based on the details provided of both options, the design of the building would be appropriate for the area, subject to details of materials and finishes.

Concerns are raised with regard to the appropriate level of External Amenity Space, overlooking of the nearby school, closure of the emergency access road, layout of parking provision and size and location of the proposed bin store.

A SAMM's payment of £314.05 per dwelling would be required to compensate for impact on the SPA/RAMSAR sites and migrating birds'.

3.2.4. In addition, the Council noted that the pre application schemes had not provided for the emergency link required under permission 20070516 and that this should be provided as part of any future planning application. The pre application response also highlighted the need for noise surveys and contaminated land assessments to be undertaken.

3.2.5. The pre application response highlighted the sizeable housing need required in the area but noted that the scheme would only provide a 'minimal contribution to meeting housing needs'. When viewed in isolation, this may be true, however this belittles the value that cumulative windfall sites have overall in the district. This is considered further below.

3.2.6. For further information, please refer to Appendix A which details the Pre-Application response in full.

4. The Proposal

- 4.1. The application seeks full planning permission for the Erection of 6no. affordable residential dwellings, emergency access / pedestrian / cycle route with associated parking and landscaping. Please refer to Figure 6 for the Proposed Site Plan and its relationship with the surrounding area.
- 4.2. The proposed scheme is for a total of 4no. 2-bed houses and 2no. 1-bed apartments. The proposed layout creates a density of 50 dwellings per hectare which is comparable to similar residential areas in this part of Gravesend.



Figure 6- Proposed Site Plan

- 4.3. Plots 1-4 will feature a ground floor with a living/dining area, kitchen, cloakroom, and downstairs toilet. The first floor of each dwelling will have two bedrooms and a shared bathroom. Plots 5 and 6 will include an open plan living, dining, and kitchen area, along with one bedroom and a bathroom
- 4.4. The existing access to the site via Nursery Mews will be retained. The proposal includes the provision of a new 3.7m-wide emergency access road to the south of the site, connecting Nursery Mews in the west with Cedar Avenue in the east.
- 4.5. The proposal provides sufficient parking spaces for all dwellings, in line with relevant guidance (as discussed later in this statement). Additionally, separate cycle sheds will be provided at the front or rear of each plot, depending on the layout. Electric vehicle charging points will also be installed on-site, with details to be finalized by condition.
- 4.6. Adequate space is available on-site for the storage of waste and recycling bins. These bins are expected to be collected from the front of the site along Nursery Mews, where the arrangements are considered both accessible and suitable for the scale of the development.

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- 4.7. Each dwelling is proposed with private, landscaped courtyard gardens at both the front (south-facing) and rear of the properties. Further landscaped areas are planned within the site and along its boundaries. Additionally, informal open spaces are proposed to the southwest and northeast of the site.
- 4.8. A traditional palette of materials will be used, including red multi-stock brick, plain grey roof tiles, soldier course features, grey window frames, rainwater goods, and a rendered feature panel.
- 4.9. For further information, please refer to the Design and Access Statement.

5. Policy Overview

5.1. Introduction

5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless materials considerations indicate otherwise. In this case the Development Plan for the area consists of the following:

- **Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)**
- **Gravesham Local Plan First Review (1994) – saved Policies**
- **Kent County Council Minerals and Waste Local Plan 2013-30 (2020)**

5.1.2. It is acknowledged that Gravesham Borough Council was undergoing a Local Plan Review. Work on this process has been halted and it was agreed at Full Council on 18 April 2024, that the Council will start work on a new Local Plan. On this basis, there is no emerging Local Plan policy that needs to be considered for this planning application.

5.2. National Planning Policy Framework (NPPF)

5.2.1. The NPPF, most recently amended in December 2023, sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

5.2.2. The following extracts of the NPPF are considered most relevant in the determination of this application. The below are not explored in detail within this Statement but have been fully reviewed in preparation of this application.

Chapter 2 (Achieving Sustainable Development)

Chapter 5 (Delivering a Sufficient Supply of Homes)

Chapter 9 (Promoting Sustainable Transport)

Chapter 11 (Making Effective use of Land)

Chapter 12 (Achieving well-designed places)

Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)

Chapter 15 (Conserving and enhancing the natural environment)

5.3. Planning Practice Guidance (PPG)

5.3.1. The PPG supplements the overarching objectives of the National Planning Policy Framework. The guidance provided by the PPG has been fully considered in the creation of the application and the proposed plans are seen to be fully compliant with it.

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5.4. Gravesham Local Plan Core Strategy 2014:

- 5.4.1. The Local Plan Core Strategy is the main document in the Gravesham Local Plan. It is accompanied by a Policies Map which shows the areas affected by the policies in the Core Strategy and saved policies from the Local Plan First Review (1994). The main policies of relevance are:

Policy CS01 – Sustainable Development

Policy CS02 – Scale and Distribution of Development

Policy CS11 – Transport

Policy CS12 – Green Infrastructure

Policy CS13 – Green Space, Sport and Recreation

Policy CS14 – Housing Type and Size

Policy CS15 – Housing Density

Policy CS16 – Affordable Housing

Policy CS18 – Climate Change

Policy CS19 – Development and Design Principles

5.5. Saved Policies in the Gravesham Local Plan First Review 1994:

- 5.5.1. Certain policies of the Local Plan First Review (1994) have been ‘saved’ via Direction of the Secretary of State, under provisions of Paragraph 1(3), Schedule 8 of the Planning & Compulsory Act 2004. Annex 1 of the National Planning Policy Framework confirms that these ‘saved’ policies still form part of the development plans. The following saved policies are relevant:

Policy P3 – Vehicle Parking Standards

Policy T5 – Access to the Identified Highway Network

Policy TC7 – Other Archaeological Sites

Policy LT6 – Open Space in New Housing Development

5.6. Supplementary Planning Guidance and other Documents:

- 5.6.1. The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications:
- 5.6.2. In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance. The following documents are relevant:
- SPG2 – Residential Layout Guidelines (2020).
- SPG4 – KCC Parking Standards (2006).

Householder Extensions/Alterations Design Guide (2021)

Technical Housing Standards – Nationally Described Space Standard (2015);

5.7. Gravesham Borough Council Five Year Housing Land Supply Position

- 5.7.1. Gravesham Borough Council is currently unable to demonstrate a supply of deliverable sites for housing against its housing requirement over the next five years, with the most recent Report (2022-2027) outlining a housing land supply of 2.9 years.

6. Planning Appraisal

6.1. Introduction

- 6.1.1. This section of the statement details how the proposed development complies with the policies set out within the Development Plan. The following matters are the principal considerations with regards to the proposal:

Principle of Development

Affordable Housing

Density of Development

Design, Form and Appearance

Residential Amenity

Noise

Highways and Parking

Trees

Ecology and Landscaping

Flooding and Drainage

Sustainability

Lighting

Contamination

Other Material Considerations

6.2. Principle of Development

- 6.2.1. With regards to the principle of development, the site is located within the urban area of Gravesend. Policy CS02 of the Gravesham Local Plan Core Strategy (GLPCS) (Scale and Distribution of Development) prioritises development in the urban area as a sustainable location for development.
- 6.2.2. The site is located in a sustainable location, immediately adjoining the Southfields Green development, Ifield School and King's Farm Primary School. It is less than a 10-minute drive to the Gravesend Town Centre with close public transport links including bus stops under a minutes' walk away located along Singlewell Road and Cedar Avenue.
- 6.2.3. As discussed earlier, the site was originally designated for a community facility (a day nursery) as part of a larger strategic development. However, following a Section 73 application, the requirement for a day nursery was removed, leaving the site vacant.
- 6.2.4. The proposed development of residential dwellings at a sustainable location on brownfield land aligns with Policy CS02, which prioritises the redevelopment of previously developed land within urban areas for residential purposes.
- 6.2.5. Paragraph 10 of the Framework emphasises that a presumption in favour of sustainable development is at the heart of government policy for planning. Paragraph 11 of the Framework is clear that for plan-making strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

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- 6.2.6. For decision taking, the Framework requires that where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date(8), that proposal should be considered within the context of the presumption in favour of sustainable development and 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 Framework taken as a whole.
- 6.2.7. Footnote (8) provides the definition of what is meant by 'out-of-date' which is where a local planning authority cannot demonstrate a five-year supply.
- 6.2.8. It should be noted that the Gravesham Borough Council is currently unable to demonstrate a sufficient supply of deliverable housing sites to meet its housing requirements over the next five years. The most recent Five Year Housing Land Supply Statement (2022-2027) published in March 2023 indicates that the borough has only a 2.9-year housing land supply.
- 6.2.9. Given that Gravesham is unable to demonstrate a five-year housing land supply, the council is obligated to apply the tilted balance when considering planning applications. This ensures that appropriate weight is given to the shortfall in meeting the five-year housing land supply requirement, in accordance with the provisions of the National Planning Policy Framework (NPPF).
- 6.2.10. The Council's current housing target is 6,170 dwellings over the period 2011/12 – 2018/19 equates to 362 dwellings per annum. The Five Year Housing Land report notes that windfall housing contributes about 10% of this total. Windfall housing therefore provides a very valuable, cumulative contribution to housing delivery across the Borough which must carry significant weight in the planning balance.
- 6.2.11. Therefore, the supply of 6 new dwellings is considered to make a valuable contribution to Gravesham Borough Councils severe housing need also with the site being located in a highly sustainable location.
- 6.2.12. In our view therefore, the application to provide residential development on the land is acceptable in principle and complies with Policy CS01 of the Local Plan.

6.3. Affordable Housing

- 6.3.1. Policy CS16 (Affordable Housing) of the Local Plan Core Strategy requires developments of 15 dwellings or more in the urban area to provide 30% affordable housing, with a tenure split of 70% affordable rent and 30% intermediate housing.
- 6.3.2. Gravesham Borough Council's most up-to-date Strategic Housing Market Assessment (SHMA) (June 2016) outlines an appropriate tenure split of:
- Affordable rent – 58%-66%
 - Shared ownership 22%-28%
 - Social Rent – 12%-14%
- 6.3.3. The proposed development seeks to provide 6 residential dwellings, which falls outside of the minimum requirement for affordable housing under policy CS16. As such, no affordable housing is required for the proposal to achieve policy compliance.

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- 6.3.4. Hyde Housing is however an Affordable Housing Provider and is seeking to deliver 100% affordable housing across the site. The proposed affordable housing cannot however be secured via a Section 106 agreement as this would remove the grant funding available to Hyde to make the scheme viable in the first instance. As such, the delivery of non-obligated affordable housing would be a clear benefit in meeting affordable housing needs.
- 6.3.5. In the Pre-Application Feedback (ref: PRE20230194) the Officer states,
- 'It is noted that the intention is to provide 100% affordable housing, which is considered of benefit and exceeding policy requirement in this area'.*
- 6.3.6. Policy CS14 (Housing Type and Size) outlines that new development should provide a range of dwelling types and sizes taking into account the existing character of the area and local need. The SHMA also detailed an appropriate distribution mix of affordable units, to include approximately 52% 1 bedroom properties, 34% 2 bedroom properties, 9% 3 bedroom properties and 5% 4+ bedroom properties. This appropriate future distribution places significantly higher percentage on the smaller one and two bedroom units.
- 6.3.7. On this basis, the proposals seek the provision of the smaller one bedroom and two bedroom dwellings, to meet the future distribution projections of the most up-to-date SHMA.
- 6.3.8. This proposed development at this site is considered policy compliant with regards to affordable housing and housing type and size.

6.4. Density of Development

- 6.4.1. Development on this site should meet the requirements of Policy CS14 (LPCS), where the Council expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area.
- 6.4.2. Policy CS15 (LPCS) requires that all new housing will be developed at a density, which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. These policies will be considered and assessed against the proposal later in this report.
- 6.4.3. It has been confirmed in earlier sections that the site totals 0.12ha, in which 6 new dwellinghouses would have a density of 50 dwellings per hectare. In the Urban Area CS14 (LPCS), requires that housing provides a minimum density of 40 dwellinghouses per hectare. This scheme would achieve that density requirement.

6.5. Design, Character and Appearance

- 6.5.1. Policy CS19 (Development and Design Principles) requires new development to be visually attractive, fit for purpose and locally distinctive, enhancing the character of the local built environment and integrating well with the surrounding local area.
- 6.5.2. Across the development, the building heights will be two storeys high, matching much of the residential development within this part of Gravesend. The two-storey development is located directly next to an existing three storey flat block, however, most of Nursery Mews consists of a mix of two storey and three storey housing in a terrace format similar to the proposed scheme. The scale and massing is considered appropriate for the area.

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- 6.5.3. The scheme proposes a traditional architectural style adopting the character of the local area predominantly comprised by two storey terrace forms. The dwellings have been carefully designed to provide a cohesive design response that brings together a vernacular material palette but using contemporary architectural detailing. The proposed scheme is activated with feature soldier courses and projecting brick detailing.
- 6.5.4. The dwellings feature deep and generous window proportions and porches to provide interest and variety in the street scene. The easternmost dwellings feature a hipped roof which is in keeping with the local character.
- 6.5.5. This approach to materiality has been carefully considered to ensure the scheme sits suitably within the site context.
- 6.5.6. Following the Pre-Application advice provided by the Council, the design has sought to provide external amenity space to meet the policy requirements. The external amenity spaces for each plot are compliant with the 37.2 sqm minimum garden area for accommodation for 1-2 bedrooms as follows:
- Plot 1- 56.8 sqm garden
 - Plot 2- 38.1 sqm garden
 - Plot 3- 38.1 sqm garden
 - Plot 4- 38.1 sqm garden
 - Plot 5 (Flat)- Private amenity space provided
 - Plot 6 (Flat)- Private amenity space provided
- 6.5.7. Further to the above, the site is located in close proximity to an array of open spaces around the vicinity of the site.
- 6.5.8. The proposed dwellings have been designed to meet the standards set within the Residential Layout Guidelines (SPG2 Amended June 2020) and in line with the Kent Design Guide. Large front gardens are also provided making the most of the south facing aspect.
- 6.5.9. Overall, the proposal fully accords with the criteria outlined in Policy CS19 and seeks to incorporate the principles set out with the Kent Design Guide and Residential Layout Guidelines SPG.

6.6. Residential Amenity

- 6.6.1. Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy requires that all development should be 'fit for purpose' and be adaptable to allow changes to meet the need of users. Policy CS19 also goes on to state that the design and layout of new residential development should accord with the adopted Residential Layout Guidelines.
- 6.6.2. On this basis, the proposed dwelling layouts have all been designed in accordance with the Residential Layout Guidelines SPG, meeting the minimum floor space requirements, with appropriate layouts that have been arranged so that living rooms and bedrooms of different units do not directly adjoin each other.
- 6.6.3. Within the Pre-Application Feedback (ref: PRE20230194) the Officer states,

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'A full planning application would consult neighbouring properties and other statutory consultees which will be taken into account in the decision-making process. However, there is not considered to be any detrimental impact on the amenity of residential neighbouring properties in terms of overshadowing or sense of enclosure given their location and the nature of the plot and design.'

'Some concerns were raised with regard to potential impacts on the school to the rear in terms of overlooking. The residential layout guidance also provides guidance on reasonable distances to prevent overlooking which will be useful to consider before submitting an application'.

- 6.6.4. A further review has been undertaken with regard to the minimum depth from the rear wall of the house which revealed that Plots 1-4 meet the minimum 7.6m depth as set out within the Residential Layout SPD. Plots 5 and 6 are approx. 6.5 m which is considered acceptable for a 1 bedroom apartments given there is an array of additional communal open spaces within the site and surrounding area.
- 6.6.5. With regards to existing neighbouring uses, the site is located to the immediate south of King's Farm Primary School playing field. The rear flank of the proposed properties are located at a further distance than the existing three storey property adjacent. The existing three storey property is closer and taller with a greater impact in overlooking terms than the proposed development. In addition, boundary trees (all located within the school boundary) provide for a means of visual screening between the proposed development and school field.
- 6.6.6. Within the Pre-Application Feedback (ref: PRE20230194) the Officer states,
- 'The Environmental Protection comments also require assessment of impact of the background noise from the school, given the proximity and so it is felt necessary to assess impacts both from the school to the proposed dwellinghouse and vice versa in terms of amenity'.*
- 6.6.7. A Noise Consultant has been appointed to provide a report with regards to noise as part of this application, which is explored in subheading 6.7 below.
- 6.6.8. Overall, the proposal fully accords with the criteria outlined in Policy CS19 and seeks to incorporate the principles set out with the Residential Layout Guidelines SPG.

6.7. Noise

- 6.7.1. Policy CS19 of the Local Plan Core Strategy requires new development to be visually attractive, fit for purpose and locally distinctive. 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. As part of this policy, applicants are required to:
- *avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination;*
- 6.7.2. To accompany the application, an environmental sound measurement survey has been carried out by Airo at the site on 13 and 14 September 2024. The report details that the main causes of noise are the Kings Farm Primary School, Ifield School, Gymnastics Club and surrounding roads.
- 6.7.3. In summary, the proposals are acceptable in acoustic terms and fully accord with the criteria outlined in Policy CS19 of the Local Plan.
- 6.7.4. Please refer to the submitted report prepared by Aero for further information.

6.8. Highways and Parking

- 6.8.1. Policy CS11 of the Local Plan Core Strategy outlines that new developments should mitigate their impact on the highway and public transport networks as required.
- 6.8.2. As detailed above, the proposed development is located within the urban area of Gravesend in a sustainable location. Within the immediate vicinity of the site, under five minutes' walk, are two Schools (Ifield School and King's Farm Primary), Busy Bees Nursery, a gymnasium, King's Farm Café, public open space in the form of Gravesham Brough Youth FC, and Holy Family Church Hall.
- 6.8.3. The site is located a five-minute drive from Coldharbour Road, which is a key site within the Local Plan Core Strategy and has been developed over the local plan period to become an enterprise centre with retail and industrial space, including a Morrisons and Lidl, and larger retail units and restaurants. The site is under a ten-minute drive into Gravesend Town Centre, with Gravesend railway station providing direct links into London.
- 6.8.4. The proposed development supports the use of sustainable modes of transport, and it is anticipated that the development of 6 residential dwellings will not impact upon the highway network. There are bus stops located in close proximity of the site along Singlewell Road and Cedar Avenue, which allows the use of public transport minimising the need for car usage.
- 6.8.5. Within the Pre-Application Feedback (ref: PRE20230194) the Officer states,
- 'The GBC Highways Officer raised concerns with regard to the closing of the existing emergency access from Cedar Avenue to Nursery Mews. Re-design should be considered prior to submitting an application to ensure emergency access would remain available whilst preventing formal extension of the road and unauthorised access and parking in the area'.*
- 6.8.6. This emergency access has been closed for some time we think to deal with antisocial behaviour issues in the location (we are not clear if it was ever appropriately implemented in the first instance). Following Pre-Application Feedback, we have reviewed the proposed site plan and incorporated a 3.7m width emergency access which will serve the neighbouring residential area comprising the properties along Nursery Grove and North Lane etc. That emergency access is provided for use by drivers in emergency situations only but would also provide for pedestrian and cycle use also. The design of the residential properties also provides a positive benefit in providing for natural / passive surveillance of the pedestrian route, improving the safety of the route and reducing the potential for antisocial behaviour. The provision of the emergency access and pedestrian and cycle link must be seen as a clear benefit of the proposal in the planning balance given the absence of such provision currently.
- 6.8.7. Policy CS11 also outlines the requirement for sufficient parking in new development to be provided in accordance with adopted parking standards, which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 6.8.8. Kent County Council's residential car parking standards have been reviewed which requires 1 car parking space and cycle space per unit in suburban locations.
- 6.8.9. It is proposed that the on-site parking provision will comprise:
- All parking spaces will benefit from EV charging provision.
 - A cycle store for each dwelling, in either the front or back garden, large enough for two cycles per dwelling.

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- 6.8.10. This parking provision is in line with the KCC parking standards. In addition, all parking spaces will benefit from EV charging provision.
- 6.8.11. Further to this, it is confirmed that satisfactory refuse collection and emergency vehicle attendance can take place from the turning head in the adjacent residential area and on-site for refuse collection, and on-site for fire appliances using the existing emergency access or the site access leading from the eastern end of Nursery Mews.
- 6.8.12. It is confirmed that the proposed development will result in an increase in vehicular trips to and from the site compared to the current land use. However, the level of activity is considered manageable within the local highway network, without negatively impacting highway safety, traffic flow, or the surrounding street scene.
- 6.8.13. Please refer to the submitted Highways Note produced by Motion for further information.
- 6.8.14. The proposal is considered to be acceptable in highways terms.

6.9. Trees and Landscaping

- 6.9.1. To accompany the application, a Tree Constraints Plan, Tree Protection Plan, Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement has been produced by Ginger Landscape to support the application.
- 6.9.2. In summary the report states that,
- *To implement the planning permission being sought 1no. tree (T002 willow, category C) is proposed to be removed.*
 - *As a mitigation measure 5no. new trees, hedging and shrubs benefiting wildlife are proposed to be planted to increase biodiversity and to provide interest.*
 - *A very small portion of the hedgerows with trees; T004 & T007 RPAs is affected by the construction of the bin/ bike stores and the proposed car park. Any work within the Root Protection Area (RPA) along the boundary fence shall be done by hand to minimise damage to the existing trees. Impact is within acceptable parameters.*
 - *The areas of future structural landscaping will be fenced off from the construction activities to minimise compaction damage to the soil.*
- 6.9.3. It is concluded that as long as the tree protection measures specified in the AMS are enforced, it is not expected that there will be any significant arboricultural impact on the health of the retained trees.
- 6.9.4. A landscaping plan has been developed to compensate for the loss of trees, hedges, and shrubs. The plan includes the introduction of five new trees within and along the site's boundaries, as well as seven new small and specimen trees. Additionally, the scheme incorporates new shrubs, hedging, bulbs, and lawn features
- 6.9.5. Please refer to the submitted Landscaping Scheme produced by Ginger Landscape for further information.
- ## 6.10. Ecology
- 6.10.1. To accompany the application, a Walkover Survey and Biodiversity Metric Report and Calculation has been produced by SCJecology to support the application.

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- 6.10.2. It is confirmed in the walkover survey note, a qualified ecologist visited the site on the 25th of July 2024 and confirmed that,

'The site itself and the habitats found on-site are common and widespread throughout the UK, and the habitats are of limited ecological value and only site value.'

Habitats for protected species were evaluated for their likelihood of providing shelter, roosting, foraging, basking and nesting habitat. The likelihood of protected species is negligible, and no further consideration is needed'.

- 6.10.3. A Biodiversity Assessment has been produced following the site visit in July. The project's net gain target was to increase biodiversity units above the baseline Defra's Small Sites Biodiversity Metric measured. The proposal indicates a biodiversity gain in area-based habitat units has been achieved with a total net change of 22.26% in Habitat Units and a gain in 0.0502 Hedgerow Units. (refer to excel metric submitted with the application).
- 6.10.4. It is concluded that the proposals are acceptable in ecology terms. Please refer to the submitted Ecological Documentation produced by ACJecology for further information.

6.11. Flood Risk and Drainage

- 6.11.1. Policy CS18 of the Local Plan Core Strategy states 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.*

- 6.11.2. A Drainage Strategy Statement has been produced by Infrastruct CS to support the application.

- 6.11.3. It is proposed that foul water flows are to drain to the existing manhole outside the site boundary to the west of the site via gravity, subject to Southern Water's confirmation of section 106. The main drainage run is also going to be offered for adoption under a section 104 agreement.

- 6.11.4. The surface water drainage design proposed for the new dwellings is to follow the drainage hierarchy to ensure the site reflects the natural flows from the site as closely as possible:

1. Rainwater reuse
2. [Infiltration](#)
3. Discharge to Surface Water or a Watercourse
4. Discharge to a Surface Water sewer or a Highway Drain
5. Discharge to a Foul Sewer

- 6.11.5. Surface water falling onto the roof and hardstanding areas will be drained via infiltration using modular/crate soakaways. The soakaway has been sized to manage the surface water from the roofs, car parking areas as well as the emergency access road.

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- 6.11.6. It is proposed that finished floor levels will be raised 150mm above the average ground level to mitigate against the risk of any surface water flooding. Exceedance flows will replicate the existing and flow at a surface level from the lowest point on the surface water system towards the public highway.
- 6.11.7. The proposed surface water drainage measures will be designed to contain the peak storm event that can be expected for a 1 in 100-year situation. A 40% allowance has already been applied to the site to account for future climate change and a further 10% added to the impermeable areas to allow for urban creep.
- 6.11.8. During construction, the SuDS systems will be maintained by the contractor. Upon sale of the last plot, the SuDS drainage system inclusive of access road, permeable paving and silt traps are to be maintained by the owner of the freehold or their appointed representative.
- 6.11.9. It is concluded that the proposals are acceptable in drainage and flood risk terms. Please refer to the submitted Drainage Strategy produced by Infrastruct CS for further information.

6.12. Sustainability

- 6.12.1. Policy CS18 of the Local Plan Core Strategy states that Council will seek to manage the supply of water in the Borough and reduce the impact of new development on the supply of potable water as much as possible. In addition, the Policy puts emphasis on reducing the overall carbon footprint of the Borough.
- 6.12.2. The site is considered to offer adequate accessibility, being located within walking distance of several local bus routes, local shops and conveniences, while Gravesend Train Station is a short drive. Secure cycle storage will be provided for each new dwelling within a garage supporting sustainable travel methods. There will also be provision for EV charging points supporting the transition to sustainable energy sources.
- 6.12.3. All dwellings will have Airsource heat pumps, offering a modern and sustainable method of heating.
- 6.12.4. Water consumption in all dwellings will be reduced through the use of practical and hygienic water saving measures such as flow restrictors, reduced bath volumes, water efficient white goods, dual flush toilets and water butts.
- 6.12.5. The orientation of buildings and aspect of the main habitable rooms allows for good levels of daylight within the dwellings, with natural ventilation to all habitable rooms.
- 6.12.6. High quality materials are proposed, with long life spans and requiring minimum levels of maintenance. Materials will be specified where possible to minimise their travel distance to site, ensuring where relevant that materials are specified from recognised sustainable sources with the appropriate certification.
- 6.12.7. To reduce the energy consumption associated with the building services, the dwelling shall utilise LED lighting, low energy mechanical extract fans that only operate when rooms are occupied
- 6.12.8. Please refer to the submitted Design and Access Statement produced by ECE Architecture for further information.

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6.13. Lighting

- 6.13.1. Policy CS19 of the Local Plan Core Strategy states that new development will include details of appropriate lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained.
- 6.13.2. A detailed external lighting strategy has been designed by EDS to accompany the application.
- 6.13.3. Four new led lamp posts are proposed along the existing vehicular access road and shared emergency access. The lights will provide ample light to the street allowing residents to safely use the space after dark. The lamp posts will feature hoods to direct the light to the target location and prevent unnecessary light spillage to surrounding areas.
- 6.13.4. The proposed parking area on site will also be lit using an LED lamppost which will further help with natural surveillance.
- 6.13.5. The front and rear elevation of each proposed dwelling will feature a wall mounted PIR light, aiding surveillance over the front gardens and allowing the rear the rear gardens to be used after dark.
- 6.13.6. The proposed amenity spaces will be lit via low level led bollard lights, providing ample light in order to use the space without creating unnecessary light spillage.
- 6.13.7. Please refer to the submitted Lighting Strategy produced by EDS for further information.

6.14. Contamination

- 6.14.1. To accompany the application, a Phase I and Phase II Geo-environmental and Geotechnical Investigation Report has been produced by Geo-Integrity.
- 6.14.2. Following survey works, the report recommended that 600mm clean cover layer or hardstanding will be required in areas of proposed soft landscaping and communal planting in the areas of CBR 101 and CBR 102 where granular subbase Made Ground is present. A plan showing the areas requiring the clean cover layer can be found in the Appendix of the Report.
- 6.14.3. It is also recommended that the standpipe in CT 1 is decommissioned in line with the EA guidance "Good practice for decommissioning redundant boreholes and wells", 2012.
- 6.14.4. Barrier pipe should be used to protect underground water pipes in the granular sub-base Made Ground of CBR 101; this should be confirmed with the local water company.
- 6.14.5. It is recommended that a watching brief should be undertaken during the construction phase, and if during development any previously undiscovered contamination (including visual or olfactory evidence) is found then site management should be immediately informed and inspection by a suitably qualified person should be undertaken.
- 6.14.6. It is recommended that a Stage 2 DRA is undertaken prior to the development works commencing which can be dealt with via a suitably worded condition.
- 6.14.7. On the basis of the above, it is considered that the accompanying report is acceptable if all recommendations are followed,

6.15. Other Material Considerations

- 6.15.1. The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes.
- 6.15.2. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites, which means that further declines in the bird population cannot be ruled out.
- 6.15.3. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £314.05 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them.
- 6.15.4. In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS).
- 6.15.5. In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £314.05 per new dwelling unit, **totalling £1,884.3 in total in this instance.**

7. Conclusions

- 7.1. The proposal seeks consent for the erection of 6no. affordable residential dwellings, emergency access / pedestrian / cycle route with associated parking and landscaping at the Land to the West of Nursery Mews Gravesend Kent.
- 7.2. It is of note that the Council does not have a 5-year housing supply, and for the reasons set out in this report it is concluded that the site is sustainably located, and the development proposed is of an entirely appropriate form outside the settlement boundary.
- 7.3. The site lies directly within the Built-up Area Boundary and within a sustainable location and therefore this proposal is considered to contribute positively to the area's much needed housing delivery, providing 5no. affordable homes therefore complying with Paragraph 11(d) of the Framework.
- 7.4. The application is further supported by a suite of reports which detail how the development responds to the landscape, ecological and arboricultural context of the site and how it relates to the surrounding context of the area. Information about drainage, highways, lighting and energy and sustainability have also been provided.
- 7.5. Overall, the development provides a high quality small scale housing development fully responsive of the site and the surrounding character.
- 7.6. For the reasons set out in this statement it is considered to comply with the Development Plan, as updated by the National Planning Framework and associated supplementary planning guidance. We therefore respectfully request that full planning permission is granted without delay

Appendix A- Pre-Application Feedback (PRE20230194)

Pre Application Response

Reference	PRE20230194
Site	Land To The West Of Nursery Mews Gravesend Kent
Proposed Development	Proposal for two options: 7 x two bedroom house terrace or 4 x one bedroom flats and 4 x two bedroom houses.
Case Officer Details	Ms Lisa Williams E-mail: lisa.williams@gravesham.gov.uk
Date of Advice	31 st August 2023

I am writing with reference to your request for pre-application advice at the above site, received as valid on PRE20230194 following the site meeting which took place on 24th August 2023.

I have now had the opportunity to review your proposal and can offer the following comments:

Proposal

The proposal is for one of the following options:

- Option 1: Erection of 7no., 2 bedroom terraced houses
- Option 2: Erection of 4no., 1 bedroom flats and 4no., 2 bedroom houses

Site Description

The proposal relates to a triangular piece of land, formerly used as parking servicing the Meapa Gymnastics club, football pitch and clubhouse located to the south until it was boarded up following car park alterations some time around 2013 and 2014. There are schools nearby to the northeast and southeast of the site, with residential buildings to the west.

It is noted that the site was originally retained for provision of a day nursery associated with the residential scheme ref 20040814 but the requirement for the day nursery was removed by planning approval ref 20110236. The area has since been in disuse.

The following constraints apply to the site:

- Urban Boundary
- Thames Estuary And Marshes Ramsar Buffer Zone
- Archaeological Notification Areas
- Sites of Special Scientific Interest

Relevant Planning History

Reference	Description	Decision	Decision Date
20110236	Application for removal of:- 1. The reference in Condition 24 attached to Outline Planning Permission reference GR/20040814 to the location, design, layout and ancillary car parking for a Pre-	Permitted	16.12.2011

	School Nursery and, unless otherwise agreed in writing by the Local Planning Authority, to a size as indicated in the illustrative proposals of 600m² ;and 2. Removal of Condition 14 attached to a Planning Permission reference number GR/20070516 relating to the requirement to submit for approval the plans and elevations of a Day Nursery, together with plans of the supporting car parking and associated landscaping and boundary treatments and to provide and make available for use the said Day Nursery; and 3. Removal of Condition 3 attached to Planning Permission reference number 20100044 also relating to the requirement to submit for approval plans and elevations of the Day Nursery, together with plans of the supporting car parking and associated landscaping and boundary treatments and to provide and make available for use the said Day Nursery.		
20100044	Application for variation of conditions 12, 13, 14 and 15 of reserved matter planning approval reference 20070516 pursuant to outline planning permission 20040814 to allow the multi use games area (MUGA) (condition 12), the playing pitches and community changing facilities (condition 13), the day nursery (condition 14) and the car parking to support the sports facilities including the replacement car parking for the Meapa gymnastics club (condition 15) all to be provided and available for use before the first occupation of any of the units within phase 3b of the development approved.	Permitted	19.11.2010
20070516	Details pursuant to outline planning permission reference no. GR/2004/814 relating to the siting, design, external appearance and landscaping for phases 2 and 3 of the development for a total of 134 residential units and comprising the erection of 16 detached two storey two, four and five bedroom dwellings some with detached or attached double garages; 5 pairs of two storey semi-detached two and three bedroom dwellings; 5 two storey terraces totalling 25 two bedroom dwellings and a two storey terrace of 5 two bedroom and 2 three bedroom dwellings; a semi-circular three storey terrace of 11 three bedroom dwellings with studies; a semi-circular three storey terrace of 5 three bedroom dwellings with studies and 8 two bedroom and 4 one bedroom self-contained flats; a three storey terrace of 12 two and three bedroom self-contained flats; 2 three storey buildings to provide a total of 18 two bedroom and 6 one bedroom self-contained flats; erection of a part three storey and part two storey building to provide 9 two bedroom and 3 one bedroom self-contained flats; formation of associated estate roads and laying out of associated car parking spaces; erection of a single storey building for sports changing facilities, provision of multi-use games area (MUGA) and laying out of associated car parking.	Permitted	10.10.2007
20040814	Outline application for residential development for up to 210 residential units and for community uses including nursery,	Permitted	13.05.2005

	open space with changing facilities and car parking; alterations to existing access to Singlewell Road between numbers 306 and 322 Singlewell Road; use of vehicular access from Cedar Avenue to provide access to recreational facilities.		
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Development Plan and other related Planning Policies and Guidance

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

One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014;
- Saved policies in the Gravesham Local Plan First Review, November 1994; and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy 2014:

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Design and Development Principle

Saved Policies in the Gravesham Local Plan First Review 1994:

- P3 – Vehicle Parking Standards
- T5 – Access to the Identified Highway Network
- TC7 – Other Archaeological Sites

National Planning Policy Framework 2021:

- Section 2 – Achieving sustainable development
- Section 12 – Achieving well-designed places

Other Material Considerations

Supplementary Planning Guidance and other Documents:

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

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

<https://www.gravesham.gov.uk/local-plan-policy/supplementary-planning-guidance>

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

- SPG2 – Residential Layout Guidelines (2020).
- SPG4 – KCC Parking Standards (2006).
- Householder Extensions/Alterations Design Guide (2021)
- Technical Housing Standards – nationally described space standard (2015);

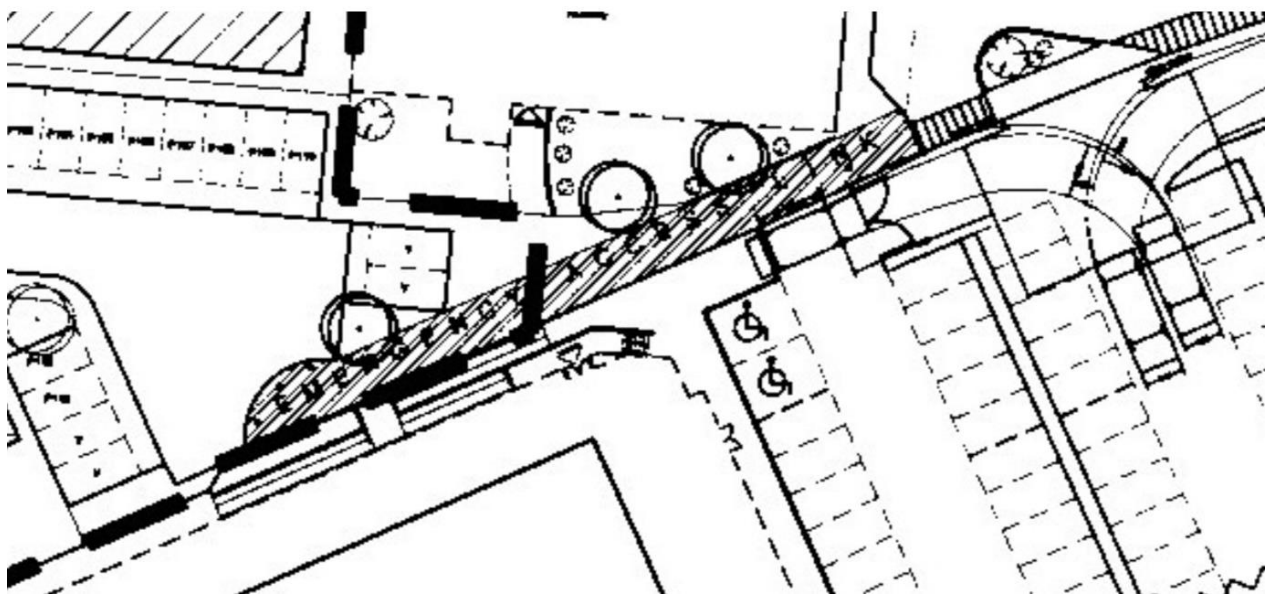
Consultees

GBC Highways Officer:

Despite its size this application requires very careful consideration and on the basis of the information available would be recommended for refusal.

The Design and Access Statement for application 20070516 states that the previous developments on the surrounding site will maintain emergency links across to the Cedar Avenue entrance.

Off Southfields Green, to the north is Nursery Grove. This road follows the line of the north and west boundaries, extending along the northern perimeter of the development site. It is lined with detached, semi-detached and terraced 2-storey houses and a 3-storey block of flats. It has been carefully considered, with Gravesham planners and highways to design out unauthorised parking and provide emergency links across to the Cedar Avenue entrance.



Extract from Masterplan 20070516

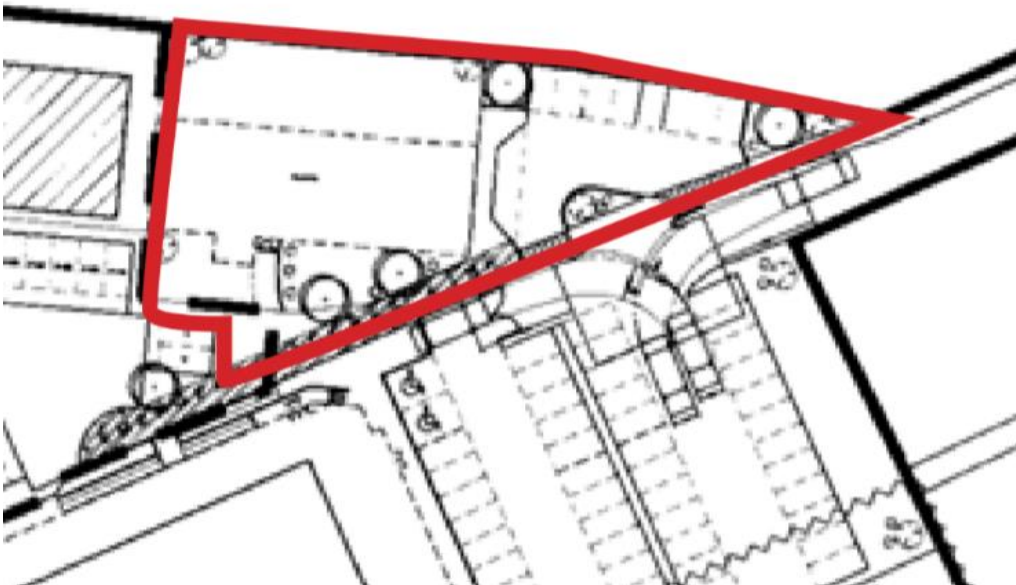
This proposal appears to remove the potential for the use of the emergency access link and so the development would not conform to the requirements of the Kent Design Guide.

Major Access Road

- 1 a road type applicable to all sites on the outskirts of main towns or in fill sites within existing suburban areas
- 2 gives direct vehicle and pedestrian access to dwellings and often links several residential areas to a local distributor road
- 3 generally serves between 50 and 300 dwellings (or equivalent mixed uses) including those located on other access roads feeding onto it. In some cases it could serve as a bus route.
- 4 preferably has two points of access or is a loop with a short connection to a single point of access and a secondary emergency access link
- 5 discourages non-essential through traffic but only where a more desirable alternative through-route exists
- 6 provides an opportunity for boulevard or avenue planting.

Here we have a loop with a short connection to a single point of access serving more than an existing hundred+ properties, so it is essential to maintain the emergency access link, which can be private, but preferably adopted by the Local Highway Authority.

Site boundary plan taken from the current submission, note the overlap with the emergency access.



Extract from the proposals document



If the emergency access can be retained the following car/cycle parking requirements would be required.

Cycle parking, one space per flat and one space per bedroom in each house. Parking to be arranged so it does not conflict with visibility requirements, both pedestrian and vehicular.

Car Parking, the National Planning Policy Framework states except in very special circumstances, maximum vehicle parking standards should not be set and so the Gravesham adopted guidance is no longer considered relevant. Compliance with Interim Guidance Note 3, issued by Kent County Council as part of the Kent Design Guide will therefore be considered as acceptable.

In a suburban area, for both 1 and 2 bedroom flats or houses a minimum of one space per dwelling is considered appropriate plus an additional 20% for visitors, so the minimum provision would be 8 spaces for 7 units and 10 spaces for 8 units, plus any replacement for existing spaces
In establishing a link to the original development. The size of parking bays should confirm to SPG4 issued by KCC

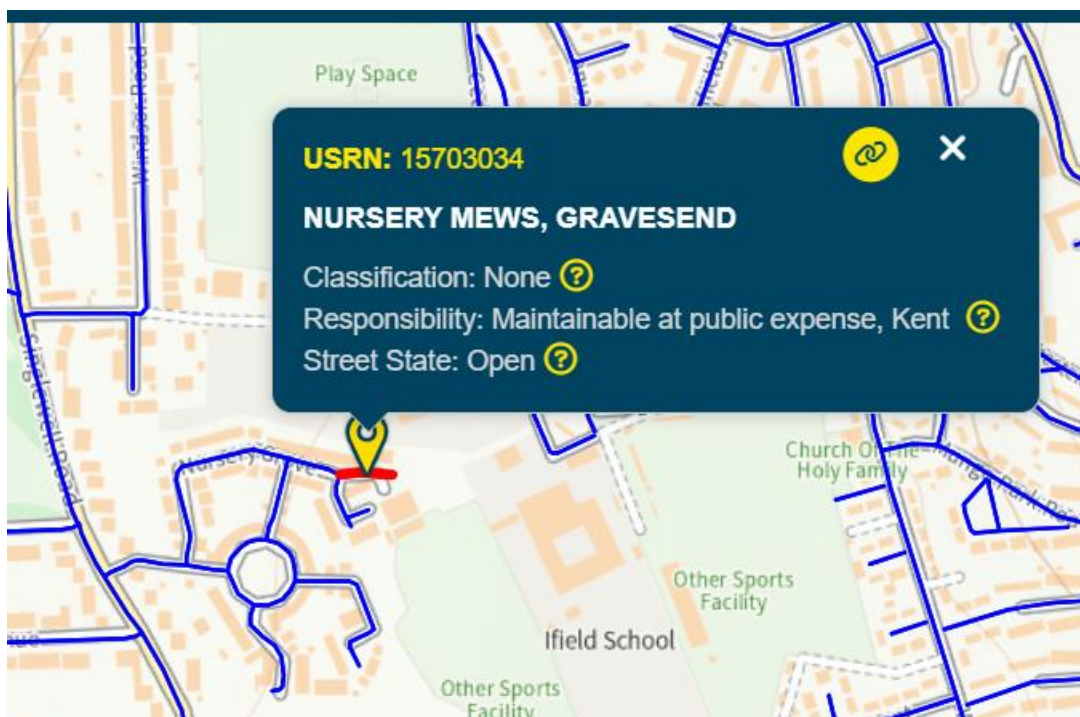
In addition, the bin store needs to be relocated or adjusted to ensure it does not compromise visibility to and from the parking spaces.

The applicant needs to reconsider this proposal to retain and potentially enhancing the emergency access link. If there are no overriding issues a pedestrian/cycle route to Cedar Avenue should be provided, linking with the nearby schools.

It is noted in application 20040814, Condition 17, refers to an emergency link and no residential units to be served by what is now Nursery Mews but am unclear if this condition would still apply given the site history. Although I note that 20070516 was submitted as details pursuant to 20040814, so presumably the original conditions apply, and the emergency link is shown on the Masterplan of the later application.

17 Unless as otherwise agreed in writing by the Local Planning Authority and Highway Authorities the layout to be submitted pursuant to condition 1 shall show that none of the residential units are accessed by the existing access from Cedar Avenue and with an emergency link only between that access road and the internal residential access roads

It is noted that the residential element of Nursery Mews is adopted so any extension should also ideally be adopted by Kent County Council, so ideally any proposals should be discussed with them prior to application.



GBC Environmental Protection:

Environmental Protection would advise that the following matters need to be considered/addressed should a planning application be submitted:

Noise:

A Noise Impact Assessment (NIA) will be required. The site is close to several potential noise sources including 2 schools, an open field/recreation area, football club/ground and a gym club (and associated car park). The NA needs to look at background noise levels when activities at these sites are taking place. So, this will need to include daytime and potentially evening monitoring during both weekdays and also at the weekends. Monitoring during terms time will need to take place to ensure that representative noise levels from the schools are measured. Noise measurements internally and also in any external amenity spaces should comply with the values in BS8223:2014. If mitigation is needed, this should be detailed in the report.

It's noted that ASHP's are to be installed. If the installation of this is considered to be under Permitted Development, then an MCS Assessment must be submitted. It should be highlighted that MCS compliance does not include noise impact from characteristics such as vibration or tonal components so this must also be considered. If the ASHP installation falls outside of PD a BS4142:2014+A1:2019 assessment should be undertaken to ensure that does not exceed 35dB as far as is reasonably practicable (including penalties for noise characteristics such as tonal components) at 1m from the façade of noise sensitive (and this is likely to the individual flats/houses themselves) and also neighbouring residential premises. This decibel level is based on a L_{Aeq} measurement made over 15 minutes.

Contamination:

It looks like some contaminated land assessments were undertaken for the adjacent site of Nursery Mews, but it's not clear if the assessments included this area. However, this was some time ago and reference standards will have changed since then. Due to this past historical use of this site, a n updated contamination assessment will be required. At the minimum, a Phase 1 Preliminary Assessment (desk Top study) should be submitted with any application.

GBC Waste and Refuse: No formal comments have been made. However we do have a Planning Guidance document on Waste Collection Requirements which will be included as an appendix for information.

Officer's Analysis

The principle considerations in the assessment of this application are:

- Housing Need
- Density of Development
- Affordable Housing
- Design and Impact on Listed Buildings
- Amenity of Future Occupiers
- Neighbouring Amenity
- Parking and Highways
- Any other Materials Planning Considerations

Housing Need

Adopted Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply (a 2.9 year supply has most recently been calculated), and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF.

This requires that in regard to housing development, planning permission should be granted unless: "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 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."

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF(2021) at footnote 7 (rather than those in development plans) relating to any of the following:

- Sites of Special Scientific Interest;
- Green Belt,
- Local Green Space,
- Areas of Outstanding Natural Beauty
- Irreplaceable habitats;
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 67); and
- Areas at risk of flooding or coastal change.

The proposed development for a net increase of '6/7' residential units would offer a minimal contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the NPPF (2021) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

As part of this balancing exercise, it should be noted that paragraphs 130 and 134 of the NPPF (2021)

requires development to add to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the National Planning Policy Framework (NPPF) and established local planning policy taken as a whole.

Whilst the Council is currently unable to demonstrate a five year housing supply, the proposed development for a net increase of up to 7/8no. dwellings would offer a minimal contribution towards meeting this local need and, accordingly, the Local Planning Authority considers that very limited weight in support of the application can be applied in this instance.

Density of the Development

Development on this site should meet the requirements of Policy CS14 (LPCS), where the Council expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area. Policy CS15 (LPCS) requires that all new housing will be developed at a density, which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. These policies will be considered and assessed against the proposal later in this report.

It has been confirmed in the information provided that the 0.12ha site. 7 new dwellinghouses would have a density of 58 dwellings per hectare and 8 dwellinghouses would have a density of 67 dwellings per hectare. In the Urban Area CS14 (LPCS), requires that housing provides a minimum density of 40 dwellinghouses per hectare. This scheme would achieve that density requirement with either option.

Affordable Housing

Core Policy CS16 requires the provision of affordable housing on developments of 15 dwellings or more or on sites of 0.5 hectares or more in the urban area. The provision of affordable housing is not a requirement on this proposal for 7/8 dwellinghouses on this site of 0.12ha. However, it is noted that the intention is to provide 100% affordable housing, which is considered of benefit and exceeding policy requirement in this area. It was noted during the meeting that the 100% affordable housing would not be guaranteed. In any case this would be policy compliant but given that the affordable housing would not be guaranteed, limited weight can be given to the benefits of such a proposal.

Design, Character and Appearance

The proposed development should comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 130 of the NPPF (2021) in terms of design, character and appearance.

The massing diagrams also clearly show that both options would reflect heights in the local area. It is noted that Woodgates House would be taller and deeper but the proposed development would have a similar depth and height to those terraced dwellinghouses to the west of Woodgates House. The effect this has is both one of improved symmetry and subservience.

The two options provided offer similar footprints which would reflect that of the wider area and would in that regard represent a cohesive extension to the existing residential development.

Both options provided offer benefits in terms of design and refer to surrounding architecture. However, based on the design and scale option 1 is the preferred option as a more symmetrical and cohesive design tapered onto the end of the existing development. Option 2 is still considered to be of good design however, given the nature and location of the site and its surroundings, Option 1 is the preference.

Whilst specific details of materials to be used have not been provided, the provided visuals appear to use a mix of brick and dark weatherboarding akin to the area. Full details of materials should be provided with the application to ensure that they are appropriate, and result in a high-quality finish but in principle there are no objections to the materials suggested.

Impact on Listed Buildings

The nearest Listed buildings are half a mile from the site and so the proposed development would have a limited impact on them. However, the proposed design could take the opportunity to enhance the area, by ensuring that the development is of a high quality in terms of design and finish, taking note of the Listed Buildings.

Amenity of Future Occupiers

The NPPF (2021) states that planning decisions should aim to secure a high standard of amenity for all existing and future users. The impact on amenity is also considered with regard to the criteria with Policy CS19 of the Core Strategy, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

During the meeting it was confirmed that the external amenity space fell short of the standards by some significance. Reconsideration of the design may be needed to bolster the amount of external amenity space available. If the standards are not met, justification for non-compliance with external space standards should be given in any case (i.e nearby public spaces etc...). However, for transparency, non-compliance with the policy in any case will result in harm to the amenity of future occupiers and weight will be given to the harm in the balancing exercise when a decision is made. Therefore any improvement to the amount of external amenity space/ justification will strengthen the likelihood of the scheme being accepted.

In terms of internal space standards, the development should comply with the residential layout guidance as shown below for clarity:

Table 1

Function of room	Floorspace sq.m
Double bedroom	11.2
Single bedroom	6.5
Living room	13.2
Dining room	9.5
Kitchen	7.2
Kitchen/diner	12.0
Lounge/diner	18.0
Bathroom and WC	3.6
Bathroom only	2.8
WC only	1.3

- 6 External access should be provided to the rear garden of a house. This standard will be deemed to be satisfied where access is available through a garage without entering the house. In addition, a way through the house from front to back, avoiding habitable rooms, should also be provided.
- 7 Direct access should be provided to a public highway or to a non-adoptable road, designed to the satisfaction of the Borough Council's Engineering Services Manager.

Table 2

Accommodation with :	Minimum garden area (sq. metres)	Minimum depth from rear wall of house (metres)
1-2 bedrooms	37.2	7.6
3 bedrooms	60.0	10.0
4 or more bedrooms	100.0	10.0

Neighbouring Amenity

Policy CS19 (LPCS) seeks to protect amenity and ensure acceptable future living conditions. Section 16 of the NPPF (2021) also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to "secure high-quality design and a good standard of amenity for all existing and future occupants of land and

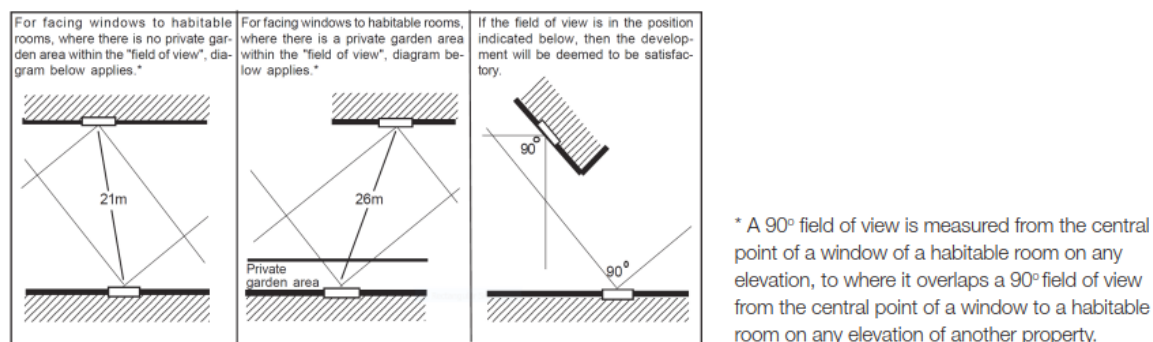
buildings”.

A full planning application would consult neighbouring properties and other statutory consultees which will be taken into account in the decision-making process. However, there is not considered to be any detrimental impact on the amenity of residential neighbouring properties in terms of overshadowing or sense of enclosure given their location and the nature of the plot and design. Some concerns were raised with regard to potential impacts on the school to the rear in terms of overlooking. The residential layout guidance also provides guidance on reasonable distances to prevent overlooking which will be useful to consider before submitting an application. These are included below for ease of reference:

Privacy distances and overshadowing

- 16 All applications for new dwellings (including flats) will be expected to comply with the Borough Council's privacy distances and guidance on overshadowing. The standards specified protect the privacy and amenity of the occupiers of existing and proposed dwellings and protect against loss of light and overshadowing from obstructing buildings.
- 17 Where windows of habitable rooms face each other (whether across a road, pedestrian way or private garden) a window-to-window distance of at least 21 metres should be provided. Habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms.
- 18 In addition, a minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling.
- 19 For “single aspect” dwellings, the minimum distance from the window of a habitable room to any house wall of equivalent height containing no habitable room windows can be reduced to 11 metres.
- 20 In all cases, the privacy distances will be applied on the basis of the principles set out in figure 1 on “fields of view” which are illustrated below.

Figure 1



As advised during the meeting, consultation with the school would be useful to ascertain what the area to the rear of the site is used for and the potential implications on the school from the development. Details should be included in a submitted application. The Environmental Protection comments also require assessment of impact of the background noise from the school, given the proximity and so it is felt necessary to assess impacts both from the school to the proposed dwellinghouse and vice versa in terms of amenity.

Highways & Parking

The GBC Highways Officer raised concerns with regard to the closing of the existing emergency access from Cedar Avenue to Nursery Mews. Re-design should be considered prior to submitting an application to ensure emergency access would remain available whilst preventing formal extension of the road and unauthorised access and parking in the area. The officer also raised concerns regarding the position of the bin store and its impact on visibility splays.

Another additional query is the practicality of the parking provision with the primary parking spaces for residences being accessed from Nursery Mews and visitor parking located to the rear, accessed from a different road, being Cedar Avenue. The concern is that visitors will tend to be directed to Nursery Mews and park along the road/by the emergency access instead of redirecting to the visitor parking which is accessed from Cedar Avenue. The below image shows the likely route visitors would have to take if

directed to Nursery Grove in error. Note that as the road is gated it would not be possible to take the route travelling up to Singlewell Road, Windsor Road then Cedar Avenue and so the likely routes require travelling some distance. One such solution would be to have primary occupier parking located to the back of the site and visitor parking to the front elevation.





The required parking and cycle provision has been fully detailed in the comments from GBC Highways Officer. However, it is advisable to contact KCC Highways who have their own pre-application advice service, prior to submitting a planning application.

Any Other Material Planning Considerations

Ecology and Biodiversity (Bird Mitigation) - The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites, which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £314.05 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the

adverse impacts of new housing development on the birds.

In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £314.05 per new dwelling unit.

Environmental Protection

The Environmental Protection Team have provided detailed comments on surveys and reports required as part of the application in terms of both Land Contamination and Noise Impacts.

Waste and Refuse

Queries were raised with regard to the size of the bin store shown on the plans and further consideration should be given to both its position in terms of highway comments and appropriate size for the number of dwellinghouses it would serve in the borough.

Section 106/CIL

Section 106 contributions would not be required on this development as it is under 10 units. Gravesham Borough Council is also not a CIL charging Authority.

Summary

- The proposed development would be acceptable in principle.
- Based on the details provided of both options, the design of the building would be appropriate for the area, subject to details of materials and finishes.
- Concerns are raised with regard to the appropriate level of External Amenity Space, overlooking of the nearby school, closure of the emergency access road, layout of parking provision and size and location of the proposed bin store.
- A SAMM's payment of £314.05 per dwelling would be required to compensate for impact on the SPA/RAMSAR sites and migrating birds.

A full application would as a basis required the following plans/documents to be submitted:

- A Full Planning Application Form
- A Site Location Plan
- Existing and Proposed Site/Block Plans
- Proposed Floor Plans
- Proposed Elevations
- Site Levels/Sections
- Visibility Splays and Parking Plans
- A Noise Impact Assessment
- Refuse Arrangements
- BS4142:2014+A1:2019 assessment in relation to the ASHP
- At minimum a Phase 1 Preliminary Assessment (desk Top study)
- Tree Survey/Tree Retention Plan

Other details you may wish to submit to avoid conditional requirement:

- Soft Landscaping Scheme with full details of materials and Tree Planting Plan
- Hard Landscaping Scheme with full details of materials
- Sustainable Surface Water Drainage Scheme and Infiltration

- Full Details of External Materials
- Full Details of Boundary Treatments and Positions
- Details of EV Charging Points and Cabling
- Tree Protection Plan

Please note that as part of the consultation process of a full application there may be requirement to submit additional supporting information.

Next Steps

If planning permission is sought, an application can be made through the Planning Portal, here:

<https://www.planningportal.co.uk/applications>

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at:

<https://www.gravesham.gov.uk/downloads/file/382/local-validation-list>

Prior to submitting a planning application, you may wish to engage the services of planning agent;

<https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website;

<https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application-service>

You are advised that PRE20230194 is now closed.

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