

St. Joseph's Prep School, Gravesend

Response to Highway Comments (Ref. GB/20240013)

Client:	Galliard (Gravesend) Limited	Job No:	327223
Date:	21 May 2024	File Name:	240523 327223 TN 002 Rev A
Prepared by:	GB	Approved by:	JEGB

1. Introduction

1.1 Overview

- 1.1.1 This Technical Note (TN) has been produced following post application comments (dated 05/03/2024) from Kent County Council (KCC) in their role as Local Highway Authority (LHA) and Gravesham Borough Council (GBC) their role as Local Planning Authority (LPA) on the proposed planning application (Ref. GB/20240013) (copies attached at **Appendix A**).
- 1.1.2 The proposed scheme comprised of the proposed conversion of existing Victorian building (former prep school), demolition of other existing buildings and development of the site to provide a mixed-use development comprising a new 3-storey GP surgery, 54 new residential dwellings (41 houses and 13 flats) with access, public open space and landscaping.
- 1.1.3 The responses raised a number of queries but was primarily focussed on parking provision. This TN therefore formally addresses the comments made by KCC and GBC. It should also be read in conjunction with the Transport Statement (TS) (Ref. 231130_J327223_TS_001 Rev A) that was submitted as part of planning application.

2. KCC Comments

2.1 General Comments

- The application is supported by a Transport Statement dated November 2023 which is considered mainly acceptable and is based on pre-application discussions undertaken with KCC on 18th September 2023.*

2.1.1 Agreed.

- *The other elements of the Transport Statement are found to be acceptable and generally comply with the pre-application discussions and advice.*

2.1.2 Agreed, no comments have been made on the traffic generation/impact of the scheme nor the Travel Plan that was submitted and therefore it is considered that these are agreed.

- *However, there are a number of errors in the TS that require attention, for example, there are two Appendix Cs.*

2.1.3 The TS includes Appendices A – J and Appendix B of the TS is a copy the scoping note that was issued to KCC at pre app. That note had three appendices within itself (Appendix A – C) and have been included. This is not an error, it's a document that has its own appendices that has been included in the appendices of the TS (at Appendix B).

2.2 Parking Provision

- *Section 4.5.2 states that KCC Parking Standards (IGN3) require a maximum of 1 space per 1 bed dwelling, 2 spaces per 2 or 3 bed dwelling, and 3 spaces per 4 bed dwelling. This is incorrect for an "edge of centre" location which recommends a maximum of 1 space per 1, 2 or 3 bed dwellings. Section 4.5.3 then states that all properties will be provided with 1 parking space which conflicts with the previous statement in 4.5.2. The calculation in Section 4.5.4 stating that a maximum of 96 spaces should be provided is also conflicting stating that 60 spaces are being provided (54 + 4 garages + 2 visitor spaces) which, although this is somewhat correct, is most confusing.*
- *KCC Parking Standards recommends a total of 20% visitor parking (not within curtilages) which would amount to 11 spaces. Whilst the 20% figure is a maximum, it is recommended that in such a location where on-street parking is limited by layout, particularly on shared surfaces, that the full 11 visitor spaces should be provided and that these should be evenly spread across the development. The site layout should be amended accordingly.*

2.2.1 It is understood that the difference in standards being referred to is with regards to levels required by KCC and that Gravesham Borough Council (GBC) has outlined that are used within the borough.

2.2.2 The submitted TS reviewed the parking standards as set out in KCC's Supplementary Planning Guidance 4 Vehicle Parking Standards July 2006 document. These are maximum levels (therefore lower is accepted in sustainable areas) and include:

- 1 parking space for 1 bedroom;
- 2 spaces per dwelling for 2 and 3 bedrooms;
- 3 spaces per dwelling for 4 or more bedrooms;

2.2.3 The above standards do not make reference to the requirement for any visitor spaces to be provided.

- 2.2.4 Para 4.5.4 of the submitted TS provided a review of the total policy maximum requirement based on the above standards which totalled 96 spaces but detailed that a lower number of spaces would be provided (54 spaces, 4 garages and 2 visitor spaces) due to the sustainability of the site and to help reduce car usage.
- 2.2.5 The KCC comment above suggests the requirements should be based on the Kent Residential Parking Standards (IGN3) (2008) and the standards would fall under the category of "Edge of Centre" given that there are adequate parking restrictions in the adjacent roads. The level of parking is a maximum and is:
- 1 space for 1 - 3 bed houses and flats
 - 1.5 spaces per 4 bed dwelling and above
 - In addition visitor parking at a rate of 20% should be provided
- 2.2.6 However, on the Gravesham Borough Council (GBC) website it is indicated that GBC do not use KCC's most recent parking standards (IGN3) and simply revert back to the 2006 standards with the website stating that they use the Kent Design Guide "except the supplementary guidance on residential parking".
- 2.2.7 However when both standards and the proposed provision on site are reviewed against one another, there is little difference between the two (with the exception of visitor spaces). Based on KCC's parking standards, the scheme would require 54 spaces and 20% visitor spaces which equates to 11 spaces. The policy does however add that visitor spaces are 'not always needed for flats', if the flats (13) are removed from the total, the visitor space requirement would be 8 spaces.
- 2.2.8 The current site provides 2 visitor spaces, however, to satisfy KCC's comments, an additional 9 have been included in the revised masterplan. A copy of this is provided in **Appendix B** of this TN.
- *Similarly, for the Medical Centre, the maximum parking provision in accordance with Kent Parking Standards (SPG4) is 1 space per 2 staff and 1 space per 4 consulting / treatment rooms - a total of $20 \times 4 + \text{no of staff} / 2 = 80 + \text{staff parking (number of staff not provided but needed)}$. The proposal is for 40 spaces in Section 4.5.7 which is considerably less than the maximum standard. The TS (4.5.7) states that "This level of parking will be justified through an accumulation assessment to demonstrate that it can serve the expected demand." but no justification is provided and needs to be, possibly based on other similar facilities in the locality. Given the low level of residential parking on the development there are concerns that should the parking quantum for the Medical Centre be found to be inadequate, there is no space on the development site to expand at a later date. There are risks that the residential parking may overspill into the medical centre car park or vice versa resulting in further parking on existing local roads which would not be acceptable.*

- 2.2.9 A parking accumulation assessment is provided in Table 6.3 on page 35 of the submitted TS. The table shows a maximum accumulation of 33 which is below the 40 spaces provided. Therefore, the proposed number of spaces are considered suitable to serve the scheme.
- 2.2.10 The drawings submitted as part of the application have been updated for completeness and attached at **Appendix C**.
- 2.2.11 The trip rates and trip generation have been accepted by KCC and the parking accumulation detailed in the TS has been derived from the arrivals and departures of the trip generation. The trip generation is a function of parking demand (i.e. departures removed from arrivals equates to the level of cars that remain in the site) and therefore considered suitable to justify the proposed parking provision.

3. GBC Comments

- 3.1.1 Further comments were provided by the LPA with regards to highways – these were additional and separate to the comments made by the LHA. It is noted that the LHA in their formal response confirmed that “The other elements of the Transport Statement are found to be acceptable and generally comply with the pre-application discussions and advice.” On this basis elements not raised by KCC are considered to be agreed and acceptable given their role as the LHA.

3.2 Layout

- First I will address the issue of an emergency access as there appears to be some misunderstanding on the requirements for one and I accept it depends on the interpretation of the guidance. For this I will refer to the Kent Design Guide. This development is on the boundary of a minor access road and a minor access way. The first can serve up to 100 dwellings or a cul-de-sac if it serves no more than 50 dwellings unless an emergency access route, to serve also as a pedestrian and cycle route can be provided.*
 - A minor access way serves a maximum of about 50 dwellings (or 25 if a cul-de-sac) As this proposal serves some 54 dwellings and a proposed Doctors Surgery, it is my understanding that an emergency access route is required. This should be possible with an appropriate link to Coombe Road, unless there is a ransom strip, in which case the developer may need to reconsider the number of dwellings being provided. (Pages 126 and 128 of the Kent Design Guide)*
 - The detailed layout will be checked by Kent County Council if the road is to be adopted to ensure that it conforms to their requirements*
- 3.2.1 The layout of the road and scheme has been reviewed by KCC in their role as LHA and was found to be acceptable with no comments raised. KCC will ultimately adopt the road and therefore be responsible for maintenance and operation and therefore with no objection made to it, is considered to be acceptable.

- *With the development being a cul-de-sac adequate on site turning readily able to accommodate a 12 metre refuse vehicle is required and none seems to be shown. The Kent Design Guide permits a maximum reversing distance of 20 metres for a refuse vehicle.*
- *Vehicle Turning Considerations*
 - *large service vehicles should not be expected to reverse more than 40m refuse*
 - *vehicles should not be expected to reverse more than 20m*
 - *pantechnicons should not be expected to reverse more than 60m*
 - *cars and smaller service vehicles should not be expected to reverse more than 25m.*
 - *designers should note that poor provision for parking of large vehicles will affect accesses.*

3.2.2 Tracking drawings were provided at Appendix G of the submitted TS and demonstrated that the vehicles could turn within the site at the appropriate locations. A turning head is provided at the end of the access road and is designed to reduce conspicuousness. In the GBC response, the refuse team also commented the following:

3.2.3 I am happy with the refuse collection vehicle sweep analysis which proves a turning point at the Coombe Road end of the development.

3.2.4 The layout is therefore considered sufficient to serve the scheme and acceptable to both the LHA and LPA.

3.3 Parking

- *Kent Design Guide Page 144 Creating the Design.*
- *The use of maximum car parking standards is no longer considered appropriate under the National Planning Policy Framework, except in special circumstances which do not apply here see paragraph 112 of the NPPF repeated below*
 - *112. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.*
- *The applicant needs to demonstrate the appropriate level of parking provision, via the use of available data or site surveys/questionnaires. Using old TEMPro data, the average vehicle ownership in the area is 1.32 vehicles per household, giving a residential requirement of 71 spaces plus at least 10 visitor spaces (20% of household numbers, Kent County Council Interim Guidance Note 3 of the Kent Design Guide Residential Parking, which whilst not adopted by Gravesham Borough Council, better reflects the NPPF and is the Highway*

Authority's requirements and the parent document is adopted by Gravesham Borough Council) which can be on street, plus the requirement for the doctor's surgery which should be based on TRIC's analysis and is. It is also noted that the garage is not necessarily wide enough to accommodate some modern vehicles, although there is storage space due to its length. SPG4 suggests garages should be 3.6metres wide. The minimum width I would consider appropriate is 2.9 metres which provides room to open the doors to gain access to the vehicle, 2.7 metres absolute minimum to provide pedestrian access on one side. I measure the internal width at some 2.8 metres, so they are just appropriate for parking a car.

- *Given the proposal only provides 60 residential spaces, inclusive of garages and 2 visitor spaces, this is less than 80% of the anticipated need. The applicant needs to do more work to justify the provision and adjust accordingly. With regards to the Travel Plan, the emphasis should be on the reduction of single occupancy car trips, how this achieved is of less relevance, and the chasing of unnecessary targets can lead to a waste of resources, so the shift to bus target is not important as people may depending on where they live use other acceptable options Table 5.1 of the Framework Travel Plan.*

3.3.1 There appears to be some conflicting comments with regards to parking between both GBC and KCC in terms of the standards to be used. The position on parking is discussed at Chapter 2.2 of this TN and addresses the comments made by GBC above. A copy of the revised layout is provided in **Appendix B** of this TN.

4. Conclusion

4.1.1 It is therefore concluded that the information detailed above is considered sufficient to address the comments raised by KCC and GBC. The revised proposals are therefore considered to be acceptable in highway terms.

APPENDIX A



Gravesham Borough Council

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Highways and Transportation

Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 5 March 2024

Our Ref:

Application - GB/20240013

Location - Former St Josephs Convent Preparatory School , 46 Old Road East, Gravesend, Kent DA12 1NR

Proposal - Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

I apologise for the slight delay in responding to your consultation request.

The application is supported by a Transport Statement dated November 2023 which is considered mainly acceptable and is based on pre-application discussions undertaken with KCC on 18th September 2023.

However, there are a number of errors in the TS that require attention, for example, there are two Appendix Cs. Also the section on Parking - Section 4.5 is confusing.

Section 4.5.2 states that KCC Parking Standards (IGN3) require a maximum of 1 space per 1 bed dwelling, 2 spaces per 2 or 3 bed dwelling, and 3 spaces per 4 bed dwelling. This is incorrect for an "edge of centre" location which recommends a maximum of 1 space per 1, 2 or 3 bed dwellings. Section 4.5.3 then states that all properties will be provided with 1 parking space which conflicts with the previous statement in 4.5.2. The calculation in Section 4.5.4 stating that a maximum of 96 spaces should be provided is also conflicting stating that 60 spaces are being provided (54 + 4 garages + 2 visitor spaces) which, although this is somewhat correct, is most confusing. KCC Parking Standards recommends a total of 20% visitor parking (not within curtilages) which would amount to 11 spaces. Whilst the 20% figure is a maximum, it is recommended that in such a location where on-street parking is limited by layout, particularly on shared surfaces, that the full 11 visitor spaces should be provided and that these should be evenly spread across the development. The site layout should be amended accordingly.

Similarly, for the Medical Centre, the maximum parking provision in accordance with Kent Parking Standards (SPG4) is 1 space per 2 staff and 1 space per 4 consulting / treatment rooms - a total of $20 \times 4 + \text{no of staff} / 2 = 80 + \text{staff parking (number of staff not provided but needed)}$. The proposal is for 40 spaces in Section 4.5.7 which is considerably less than the maximum standard. The TS (4.5.7) states that "*This level of parking will be justified through an*

accumulation assessment to demonstrate that it can serve the expected demand." but no justification is provided and needs to be, possibly based on other similar facilities in the locality. Given the low level of residential parking on the development there are concerns that should the parking quantum for the Medical Centre be found to be inadequate, there is no space on the development site to expand at a later date. There are risks that the residential parking may overspill into the medical centre car park or vice versa resulting in further parking on existing local roads which would not be acceptable.

The other elements of the Transport Statement are found to be acceptable and generally comply with the pre-application discussions and advice.

It is therefore requested that a holding objection is placed on this application whilst a revised Transport Statement is submitted which addresses the issues raised above, particularly the parking section, and a revised layout plan is produced incorporating additional visitor parking spaces and justifiable parking spaces for the medical centre. Without these revisions, a refusal is recommended on the grounds of lack of justification for the parking provision.

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.

Internal Consultee Responses

Application No:	20240013
Location:	Former St Joseph's Convent Preparatory School, 46 Old Road East, Gravesend, Kent, DA12 1NR
Description:	Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping.
Applicant:	Galliard (Gravesend) Ltd

GBC Environmental Protection (Regulatory Services) – The submitted documents and plans have been reviewed. With regards to contaminated land, the Groundsure GeoRisk report submitted does not equate to a Phase I Preliminary Risk Assessment. The GeoRisk report flags some concerns with mining and also other ground workings on the site. In this respect, a contaminated land investigation will be required based on a phased, risk based approach.

The Noise Impact Assessment undertaken by Anderson Acoustics dated 8 December 2023 ref 6969_001R_3-0_GC has been reviewed. Appropriate noise monitoring has been undertaken. The NIA looks at the impact of surrounding noise on future occupants of the dwellings and also the impact of the development on existing sensitive receptors and new receptors as a result of the proposal. Reference has been made to appropriate standards and guidance including BS8233:2014 and BS4142.

The main noise source in the area is traffic. However, the proposal includes a GP surgery which will have various plant/equipment and also has the potential to introduce traffic noise inside the perimeter of the site to some of the proposed dwellings. As the details of the plant as equipment have not yet been finalised, it is not possible to undertake a full BS4142 assessment. Instead, appropriate plant noise levels have been proposed.

In order to achieve internal noise levels that comply with the criteria in BS8233:2014, mitigation measures have been proposed which include external building fabrication specifications, glazing specifications and specifications for acoustic trickle ventilation. With certain windows open for ventilation (those dwellings in Façade Zone A in Fig 6.-1), noise levels will exceed the criteria and therefore to prevent overheating an alternative mechanical ventilation/cooling will be needed. A specification has not been given for this.

In addition, acoustic boundary treatment to the doctor's surgery car park and the residential car park area have also been proposed (Section 7.1.4).

With regards to noise levels in the external amenity areas, most of the site complies with the criteria given in BS8233:2014. However, some amenity areas on the northern site boundary adjacent to Old Road East exceed the upper guideline level (with levels of 66dB_LA_{eq} in the

day and 61 dBLAeq at night). BS8233 states that “the external noise levels in amenity areas may not be achievable in all circumstances where development might be desirable and... a compromise between elevated noise levels and other factors, such as convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces but should not be prohibited”.

The amenity spaces on the northern facades appear to be ‘designed into’ the scheme regardless of the noise levels without any mitigation measures being proposed or lowest practicable levels achieved as per the guidance above. The balconies are of limited size so therefore, prolonged use is unlikely making them more acceptable. However, there are ground floor garden areas to the apartments/flats on this façade which will tend to have more use due to their larger size. The advice from Environmental Protection is that as this is not a town centre location where noise levels are expected to be high, then the criteria in BS8233 should be being adhered to in respect of the upper guideline value of 55dBLAeq for these ground floor external amenity/garden areas and needs to be investigated further. It is noted that there is a communal external area within the proposal, however this is at the rear of the site so not immediately accessible to those living along the Old Road East part. Therefore, it is unlikely to be used by occupants of these dwellings.

To address the above and other matters, the following is recommended.

- Land Contamination

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the CLEA guidelines and CLR 11 methodology) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval. The desk study shall detail the history of the site uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved by the Local Planning Authority prior to investigations commencing on site.
- b) The site investigation, including relevant soil, soil gas, surface and groundwater sampling, shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- d) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning

Authority.

- e) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.
- f) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

Watching Brief: The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Noise Control

1. New plant/equipment

Prior to commencement, a noise impact assessment shall be carried out and submitted to the LPA for approval demonstrating that the rating noise from fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014+A1:2019.

2. Noise Mitigation measures new Dwellings

The noise mitigation measures as detailed in report 'Noise Impact Assessment' by Anderson Acoustics dated 8 December 2023 ref 6969_001R_3-0_GC (The Report) shall be implemented by competent persons. Prior to operation a post completion noise survey must be undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. The post completion testing shall assess performance of the noise mitigation measures and the performance of any ventilation and cooling/heating system that has been installed to the satisfaction of the local authority and against the noise levels as set in The Report.

If the mitigation measures tested in the post-completion report prove to be insufficient, additional noise mitigation measures (where necessary to ensure the appropriate noise levels can be met), shall be submitted and approved in writing by

the Local Authority and installed and tested prior to operation.

The mitigation measures and the approved alternative means of ventilation and cooling/heating shall be maintained thereafter.

3. Mechanical Ventilation and Heat Recovery systems

a) Details for an air handling system for dwellings those dwellings in Façade Zone A (Fig 6.-1 in the Noise Impact Assessment undertaken by Anderson Acoustics dated 8 December 2023 ref 6969_001R_3-0_GC), shall be submitted to and approved, in writing, by the Local Planning Authority. The air quality handling system shall then be installed in accordance with the approved details. For the avoidance of doubt the installation of the air handling system will ensure the indoor air quality of each apartment is good and will enable the windows to be kept closed to reduce disturbance from outside noise. The air handling system must bring in clean air to each residential apartment so as to create positive pressure to ensure that pollution from outside is prevented from entering the unit. The scheme must also include:

- i. An inlet flow greater than the outlet flow to ensure a positive pressure;
- ii. heat recovery;
- iii. the air supply must come from a suitable clean source e.g. a rear roof of building etc. Care must be taken to locate the inlet such that it ensures that only clean air is brought into the residential units and that excessively hot or cold air is not brought in; and
- iv. sound attenuation such that there is no breakout noise or vibration from the system.

b) Prior to first occupation of the apartments, a suitable post-completion commissioning report by a competent ventilation engineer confirming that the approved system has been incorporated into the residential apartments and that the systems fulfil the purpose (i.e. that it prevents outside air entering the residential apartments) shall be submitted to and approved, in writing, by the Local Planning Authority. For the avoidance of doubt this shall include an inspection by an officer of the Local Authority to see the system is in place and in suitable working order.

The approved scheme shall be maintained in full working order for the lifetime of the development.

4. Noise levels external amenity areas

External amenity areas shall be designed and located to ensure that amenity areas are protected on all boundaries as to not exceed 50 dBLAeq,16hr. If a threshold level relaxation to 55 dBLAeq,16hr is required for external areas full justification should be provided.

Informatives

- *Code of Practice on Construction and Demolition*: Please apply as appropriate. This is a large development which is surrounded by residential premises in close proximity so it will be essential to ensure that any impacts are minimised during the demolition, groundworks and construction phases.
- *Lighting*: Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install

external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

- *Smoke Control Informative:* The proposed development is situated in a smoke control area. As such, only authorised smokeless fuels as listed in the Smoke Control Areas (Authorised Fuels) Regulations 1991 shall be burnt or fireplaces/appliances exempted by Smoke Control (Exempted Fireplaces) Orders shall be utilised. Exempt appliances are appliances (ovens including pizza and tandoori ovens, wood burners and stoves) which have been exempted by Statutory Instruments (Orders) under the Clean Air Act 1993. These have passed tests to confirm that they are capable of burning an unauthorised or inherently smoky solid fuel without emitting smoke. They must be fitted and used according to manufacturer's instructions and they can only be used for the fuel for which they are designed. When purchasing fuels and fireplaces the applicant should clarify with the vendor their suitability with respect to use in Smoke Control Areas. For further information, including confirmation that an appliance and/or fuel is suitable for use in a smoke control area, the applicant should contact the Council's Regulatory Services air.quality@gravesham.gov.uk

GBC Housing –

- The development will provide 54 units of residential accommodation. This consists of the conversion of a Victorian building into 6 flats, seven new build flats and 41 houses.
- Planning Policy CS16 requires 30% of the properties to be for affordable housing. This equates to 16.2 dwellings rounded up to 17 affordable housing units.
- The applicant is applying for a reduction in the affordable housing requirement to take account of vacant building credit.
- The vacant building credit calculation is at point 6.4.9 of the Planning Statement submitted as part of the planning application:

Revised number of affordable housing units to be provided = Expected number of affordable housing units to be provided prior to application of vacant building credit (ie 30% of total number of dwellings proposed) – (30% x existing floorspace to be demolished)/proposed floorspace to be created.

- The above calculation has been applied by the applicant to argue for a reduced affordable housing requirement to 10 units.
- My recommendation is that the above calculation is tested by an independent viability consultant at the applicant's expense.
- In addition to the above the viability assessment submitted as part of the application concludes that no affordable housing is viable on the site.

The site should be providing 17 affordable housing units on site to comply with CS16. These units should be provided as 12 affordable or social rented units and five intermediate homes, (normally shared ownership).

Given that there are currently 247 households in temporary accommodation and 865 households waiting for social housing on the GBC housing register then I believe that all evidence for a reduced percentage of affordable housing is thoroughly scrutinised by a qualified independent viability consultant at the applicant's expense.

GBC Leisure – With regards to the above application, please find some updated comments

following the earlier Pre-application from the Leisure Team - Communities & Inclusive Growth Directorate;

Policy CS13 and the NPPF recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. It is noted positively that the development will maintain an element of informal play provision/kick about area/community green etc. The council would be happy to offer further advice via the Parks & Open Spaces Team with the developer prior to formalising the equipment layout on the scale and size of the play equipment.

With regards to the impact of the development itself, it would not be expected for the developer to provide on-site formal leisure provision, but it is reasonable to expect the applicant to offset the impact of the increased population that the development will generate onto the existing leisure facility infrastructure within the area. The approach promoted by officers for this element is to secure a financial contribution towards the upgrading and development of existing local sporting and recreational facilities. Based on all the assessment data currently available including, the Open Space, Sport & Recreation Assessment, Sport England's Facilities Planning modelling and Active Places database; there is a particular shortage for example, with swimming pool hall space linked to the overall ageing leisure centre facility stock at Cygnet Leisure Centre in particular, and Cascades Leisure Centre, of which a new leisure centre is currently being designed and developed. Using Sport England's Sports Facility Calculator (SFC), and if we assume 2.5 residents per dwelling (x 54), this gives a contribution from the proposed development of £72,604.

The main overriding issue from a leisure perspective regarding the proposal relates to the actual development on formal disused playing field land, which was also used for some weekend community use by a local junior football club up to 2018, but due to the size of the site, then moved on to other local sites with larger facilities and amenities. However, there is a strategic shortfall of pitches within the borough, especially junior pitches, to satisfy current but also future demand. This is supported by the increasing number of junior teams and associated leagues that contact the council during the year, looking for local sites to access. The Leisure Team will therefore consider mitigation for the loss of the disused playing field land, based on industry standard costs for grassed junior pitch replacement (x2) to support existing and new projects that provide enhancements to current playing pitch facility stock. Projects that this contribution could be put towards include ancillary provision improvements at Kings Farm Playing Fields, which is a major junior/youth hub site, or towards future 4G pitch provision within the borough, in consultation with the Kent FA. With regards to a contribution amount towards off site provision, the loss of the pitches would be £60,000. This is an estimated cost of provision for grass pitches as outlined within the Sports England Facilities cost document (2023 Q2) for 2 x mini U7/U8 pitches. Payment should be made at an early phase of the development and should be received in full.

GBC Highways – First I will address the issue of an emergency access as there appears to be some misunderstanding on the requirements for one and I accept it depends on the interpretation of the guidance. For this I will refer to the Kent Design Guide. This development is on the boundary of a minor access road and a minor access way. The first can serve up to 100 dwellings or a cul-de-sac if it serves no more than 50 dwellings unless an emergency access route, to serve also as a pedestrian and cycle route can be provided. A minor access way serves a maximum of about 50 dwellings (or 25 if a cul-de-sac) As this proposal serves some 54 dwellings and a proposed Doctors Surgery, it is my understanding that an emergency access route is required. This should be possible with an appropriate link to Coombe Road, unless there is a ransom strip, in which case the developer may need to reconsider the number of dwellings being provided. (Pages 126 and 128 of the Kent Design

Guide)

With the development being a cul-de-sac adequate on site turning readily able to accommodate a 12 metre refuse vehicle is required and none seems to be shown. The Kent Design Guide permits a maximum reversing distance of 20 metres for a refuse vehicle.

Vehicle Turning Considerations

- large service vehicles should not be expected to reverse more than 40m refuse vehicles should not be expected to reverse more than 20m
- pantechnicons should not be expected to reverse more than 60m
- cars and smaller service vehicles should not be expected to reverse more than 25m.
- designers should note that poor provision for parking of large vehicles will affect accesses.

Kent Design Guide Page 144 Creating the Design.

The use of maximum car parking standards is no longer considered appropriate under the National Planning Policy Framework, except in special circumstances which do not apply here see paragraph 112 of the NPPF repeated below

112. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists

The applicant needs to demonstrate the appropriate level of parking provision, via the use of available data or site surveys/questionnaires. Using old TEMPro data, the average vehicle ownership in the area is 1.32 vehicles per household, giving a residential requirement of 71 spaces plus at least 10 visitor spaces (20% of household numbers, Kent County Council Interim Guidance Note 3 of the Kent Design Guide Residential Parking, which whilst not adopted by Gravesham Borough Council, better reflects the NPPF and is the Highway Authority's requirements and the parent document is adopted by Gravesham Borough Council) which can be on street, plus the requirement for the doctor's surgery which should be based on TRIC's analysis and is. It is also noted that the garage is not necessarily wide enough to accommodate some modern vehicles, although there is storage space due to its length. SPG4 suggests garages should be 3.6metres wide. The minimum width I would consider appropriate is 2.9 metres which provides room to open the doors to gain access to the vehicle, 2.7 metres absolute minimum to provide pedestrian access on one side. I measure the internal width at some 2.8 metres, so they are just appropriate for parking a car.

Given the proposal only provides 60 residential spaces, inclusive of garages and 2 visitor spaces, this is less than 80% of the anticipated need. The applicant needs to do more work to justify the provision and adjust accordingly.

With regards to the Travel Plan, the emphasis should be on the reduction of single occupancy car trips, how this achieved is of less relevance, and the chasing of unnecessary targets can lead to a waste of resources, so the shift to bus target is not important as people may depending on where they live use other acceptable options Table 5.1 of the Framework Travel Plan.

The detailed layout will be checked by Kent County Council if the road is to be adopted to ensure that it conforms to their requirements and the developer needs to note that any alterations or extensions to Traffic Regulation Orders and the provision or removal of signs and lines will be charged to him. Such as removal of school keep clear markings and signs and the provision of no waiting road markings at the approach to the Old Road East junction to protect the corner from indiscriminate parking, not necessarily by estate residents. Consideration should be given to the installation of road humps to ensure the target speed or less can be maintained but this is a detailed matter that can be resolved during the adoption process. If the road is not to be adopted, then a condition would be appropriate to ensure the road layout conforms to the requirements of the Kent Design Guide.

In its current format, I would recommend refusal for the following reasons.

1. The development layout does not provide an emergency access, which is required for roads serving more than 50 dwellings. (It is noted that some dwellings front Old Road East but all vehicular parking is accessed from the new estate road and so the road serves more than 50 dwellings)
2. There does not appear to be adequate on site turning for large vehicles to comply with the requirements of the Kent Design Guide.
3. The level of residential car parking has not been justified using analysis of data, instead relying on out-of-date policies that no longer comply with the requirements of the National Planning Policy Framework

Other than the issues raised above I have no objections.

GBC Waste – I have reviewed the attached planning application and have the following comments.

1. Service Provision - Houses

- 1.1. All collections are made from the front boundary of the property. Sufficient space should be allocated to allow space for storage and presentation for:
 - Refuse - 1 x 180ltr bin grey body and lid
 - Recycling - 1 x 240ltr bin grey body and green lid
 - Food Waste - 1 x 23ltr bin black body and orange lid with an individual 5ltr caddy per property
 - Garden Waste - opt-in' garden waste service collected via a 240ltr, 140ltr bin or paper sack
- 1.2. The boundary (point of presentation) should be as close as possible to where the vehicle passes. Collections are from the point of the property nearest to the adopted highway. Collection crews and vehicles do not go on to private driveways, this includes shared driveways.

2. Service Provision - Flats

- 2.1. Flats are generally serviced by communal bin stores. Bin stores should be large enough to accommodate and manoeuvre sufficient 1,100 litre refuse and recycling Eurobins for the number of dwellings in each block.
- 2.2. The following provision is required:

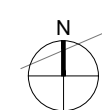


- Refuse - 1 x 1100ltr bin per 6 flats
 - Recycling - 1 x 1100ltr bin per 6 flats with specialised recycling lid
 - Food Waste - 1 x 140ltr bin per 10 flats with an individual 5ltr caddy per flat
- 2.3. The immediate area outside the bin store should be level with the road, should not include an incline and the installation of a drop kerb where necessary is mandatory. Car parking spaces should not be allocated immediately in front of the access to the bin store.
- 2.4. Collection crew members are not expected to move wheeled bins a distance greater than 15m nor over surfaces which hinder their smooth passage, for example, steps, slopes greater than 1 in 12 and uneven surfaces. The collection point should be accessible to the size of collection vehicle that is used by Gravesham Borough Council.
- 2.5. It is recommended that bin stores are fitted with a lock which is accessed via a key or a key code pad.
3. It is the responsibility of the developer to collect and remove any waste at their cost until the Council is satisfied that all waste requirements have been met. All complaints in regard to non-collection due to the fault of the developer will be passed onto to the developer for response.
4. Developers are required to pay for the provision of all bins required for a development
5. I am happy with the refuse collection vehicle sweep analysis which proves a turning point at the Coombe Road end of the development.
6. If the highway is not adopted the Council does not take responsibility for any damage caused to the road surface whilst undertaking its collections. The gross weight of refuse collection vehicles is 26t.

APPENDIX B



PROPOSED SITE PLAN @ 1:500



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P0 Planning Submission JH 13/10/2023
P1 Updated to feedback PA 14/12/2023
P2 Updated to feedback PA 06/04/2024

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Project | St. Josephs
Old Road East
Client | Galliard Homes
Title | Proposed Site Plan
Status | Planning

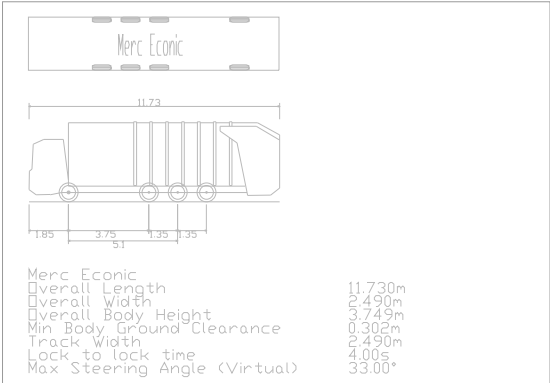
Scale @ A1 | 1:500 Date | October 2023 Drawn | SA Chk'd | MP

Project Number 22.112 Drawing Number 040 Revision P2
Bim Number

APPENDIX C



- NOTE;
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GALLIARD (GRAVESEND) LIMITED

JOB TITLE
ST. JOSEPH'S PREP SCHOOL,
GRAVESEND

DRAWING
TITLE
REFUSE
VEHICLE TRACKING

DRAWING NO.
J32-7223-PS-002

DRAWN	GB	CHECKED	JEGB
CREATED	NOV '23	SCALE	1:500 @A3

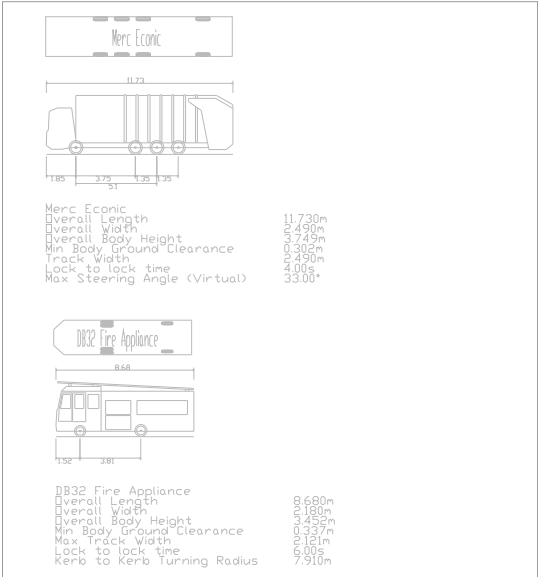
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Large Car (2006)

5.079

1.872

1.505

0.310

1.831

4.00s

5.900m

Large Car (2006)	5.079m
Overall Length	1.872m
Overall Width	1.505m
Overall Body Height	0.310m
Min Body Ground Clearance	1.831m
Max Track Width	4.00s
Lock to lock time	5.900m
Kerb to Kerb Turning Radius	

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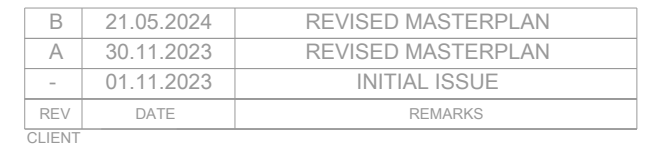


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- KEY:
- FORWARD VISIBILITY 14M (BASES ON KCC STANDARDS)
 - VISIBILITY SPLAY 2.4m x 43m (30mph MfS STANDARDS)
 - HIGHWAY BOUNDARY

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J32-7223-PS-006

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