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Full Planning Application for the construction of 76 dwellings and associated infrastructure

Milton Place Car Park, Gravesham

Planning Statement

On Behalf of
Gravesham Community Investment Partnership

February 2025

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a Full Planning Application for the construction of 76no. dwellings with associated infrastructure.
- 1.2 Gravesham Community Investment Partnership (GCIP) was formed in November 2022 and is a 50:50 partnership between Gravesham Borough Council (GBC) and Hill Group. GCIP is overseen by a Board which includes Members from both parties. Due to the pressing need for affordable housing in Gravesham, both Hill Group and GBC have worked together to identify opportunities to deliver affordable housing on Council owned land.
- 1.3 This Planning Statement sets out the relevant Site history and planning policy background, together with the details of the Site's context and suitability for development.
- 1.4 It is the conclusion of the Planning Statement that the proposals accord with National and Local Planning Policy Guidance and represent a sustainable form of development that should be supported by Gravesham Borough Council (GBC) and approved without delay (NPPF, para 11).

2.0 APPLICATION SITE & PLANNING HISTORY

i) The Site & Surrounding Area

- 2.1 The Site is a roughly triangular plot of land which currently includes a public car park (known as Milton Place Car Park) to its north western corner and a disused BT storage depot to its south western corner. The eastern part of the Site accommodates a skate park, and the central area of the Site is currently used as open space.
- 2.2 The Site fronts onto Milton Place to the west, Ordnance Road runs to the south of the site. Along the southern boundary, between Ordnance Road and the site, is an area of car parking which is partially in a third party ownership.
- 2.3 A tree lined footpath/cycleway runs along the northern boundary of the Site. To the north of the footpath is the Riverside Leisure Area, a key area of open space within Gravesend. The Site is separated from the Riverside Leisure Area by metal railings which is accessed via gates along the northern side of the footpath.
- 2.4 Building heights vary in the immediate context, with 4-storey townhouses in Milton Place to the east, up to 9 storey residential development to the north west.
- 2.5 The Site is situated within the Riverside Conservation Area and directly adjacent to the Milton Place Conservation Area (to the west). New Tavern Fort, a Scheduled Ancient Monument, is located to the north, which is accessible to the public.
- 2.6 The Site has historically hosted various forms of development including the Holy Trinity Church which was located to the south western corner of the Site (demolished in 1963). This area of the Site subsequently operated as a BT storage depot until the early 2000's. An open air swimming pool occupied the central part of the site between the 1930s and 1980s.
- 2.7 A public car park is located to the north west of the Site. Access to Milton Place Car Park is provided from Ordnance Road to the south. There is also an access which is not currently used and blocked with concrete blocks from Khartoum Place to the north west of the Site.
- 2.8 Part of the Site is located within an Air Quality Management Area (AQMA) (further details on the location and impact of the AQMA are considered later in this Planning Statement). The Site falls within Flood Zone 1. The local area is of no other environmental designations.
- 2.9 The Site is in a sustainable location with Gravesend Railway Station located approximately 0.5 miles away. Gravesend Railway Station offers regular high-speed services to London St Pancras

and Ashford International. There are also bus stops along Milton Road which provide connections to Medway, Dartford, and Bluewater Shopping Centre.

ii) Planning History

- 2.10 There is various history associated with the application site; however, the majority of development was undertaken prior to the existence of the planning system. A summary of the relevant planning history is included below.

Former Depot Site:

- 2.11 19890771- planning permission refused for the retention of the 3.8m high weldmesh and lattice post security fence and security gates
- 2.12 19900069- planning permission granted for the retention and reduction in the height of the weldmesh and lattice post security fence and entrance gates at 2.8m high
- 2.13 20050434- temporary planning permission granted for the change of use of the land for use as a car park for 74no. spaces as an extension to the existing Milton Place car park
- 2.14 20060551- renewal of temporary planning permission for use of land as a car park
- 2.15 20070764- further renewal of planning permission for use of land as a car park. This planning permission required the use to cease by 31 October 2009. There has been no further application to extend the temporary use.

Skate Park:

- 2.16 2010074- Outline planning permission granted for the laying out of a skateboard park with associated landscaping. At the time of the application the land was identified as 'land at former Outdoor Swimming Pool, Ordnance Road'
- 2.17 20110034- Planning permission granted for the construction of a skateboard park with associated facilities including lighting, earth mounding and landscaping.
- 2.18 The Officer's Committee Report relating to the skateboard park applications describes the planning history for the Site as:

The application site is part of the site of the former Gravesend Outdoor Swimming Pool which was originally opened in 1938. There used to be a building (Slipper Baths) on this particular part of the swimming pool site. The outdoor swimming pool had been converted in 1977 for use as a skateboarding arena. The pool and all the buildings were demolished in 1989.

(iii) Pre-Application Advice

- 2.19 An ongoing series of pre application advice discussions have been undertaken with Gravesham Borough Council (GBC). A total of 3no. pre application meetings have been held with GBC as follows:
- 1) Pre-App 1- 29 July 2024- discussion on the broad principles of the proposed scheme. This meeting comprised the consultant team, the Head of Planning at GBC, the Case Officer at GBC, the Open Spaces Officer at GBC, and GCIP.
 - 2) Pre-App 2- 1 October 2024- discussion of technical matters and included officers of GBC, Kent County Council (KCC) Highways and Drainage (LLFA).
 - 3) Pre-App 3- 05 November 2024- presentation of final layouts and illustrative elevational details.
- 2.20 Separate pre-application discussions were undertaken with Historic England on 18 July 2024 and a Site meeting was held with Historic England on 14 October 2024.
- 2.21 The Applicants also held a public consultation event on 02 October 2024 which was attended by 67no. people including local residents, a number of local councillors and opposition members and, notably, a group of skatepark users.
- 2.22 Further details of the pre-application meetings and design evolution are provided in the Design and Access Statement and the Statement of Community Involvement.

3.0 DEVELOPMENT PROPOSALS

i) Overview of the Development Proposals

3.1 This application seeks Full Planning Permission for the construction of 61no. apartments and 15no. houses, totalling 76no. dwellings. A number of technical reports and documents which have informed the development of the proposals and are submitted both in support of the Full Planning Application.

3.2 The proposed application description is as follows:

Full Planning Application for the construction of 76 dwellings and associated infrastructure

3.3 The key principles of the proposal consist of:

- The rationalisation of the surface parking at Milton Place by approximately 50% (to 84no. spaces) to reflect the number of spaces required for the maximum usage of the car park. The retained car park would be to the north western corner of the Site.
- Construction of an assisted living apartment block to the south western corner, primarily on the former BT Depot area of the Site to.
- Construction of 15no. family market homes.
- Height created to the south western corner to reflect the previous location of the church with a stepping down in scale and height to the north and east.
- Open space retained and enhanced to the centre and east of the Site including the retention of the skate park.
- Maintenance and enhancement of key sight lines from the Fort to and from Ordnance Road.
- Retention of all high quality and value mature trees.
- Frontage to the east to provide passive surveillance to the open space.
- Frontage onto Ordnance Road with overlooking to the open space to the north.

4.0 PLANNING POLICY FRAMEWORK

4.1 The following section of this report identifies the most relevant planning policy and guidance at National and Local level. Generally, only policies relevant to the consideration of this application are included. The proposals are assessed against the relevant policy and guidance on a topic basis in the following section.

4.2 The starting point for the determination of this application is Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires all applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance, the development plan includes:

- Gravesham Local Plan Core Strategy (2014)
- Gravesham Local Plan First Review (1994) – Saved Policies
- Kent Minerals and Waste Local Plan 2013-30 (2020)

i) National Planning Policy Framework

4.3 National policy and guidance is set out in the National Planning Policy Framework (NPPF) (2024).

4.4 The NPPF (para 8) identifies three objectives to 'achieving' sustainable development; economic, social and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways.

4.5 The NPPF sets at the heart of the planning system the presumption in favour of supporting sustainable development. This means securing Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable Development is described as comprising three dimensions which include:

- An **Economic** Role;
- A **Social** Role; and
- An **Environmental** Role.

4.6 The NPPF does not change the statutory status of the Development plan as the starting point for decision making, yet it is a material consideration. Therefore, to achieve sustainable Development the NPPF directs (para 11) that decision takers should approve Development proposals where they accord with the Development plan 'without delay'; or, where there are

no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, to grant planning permission unless:

- i) The application of the policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination

4.7 Section 4 relates to Decision Making and requires LPAs to approach decisions on proposed developments in a positive and creative way, working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Para 39 identifies decision makers should seek to approve applications for sustainable development where possible.

4.8 Paras 40-47 focus on the benefits of early engagement and the need to undertake good quality pre-application discussions to facilitate any issues being resolved at pre-application stage.

4.9 Paras 56-59 require LPAs to consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations but seeks planning conditions to be kept to a minimum.

4.10 Paras 103 and 104 relate to open space and recreation. Para 103 highlights that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change.

4.11 Para 104 seeks to protect existing open space, sports and recreational buildings and land unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use

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- 4.12 Section 11 'Making Effective Use of Land' focuses on the need for planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (para 124).
- 4.13 Para 125 states that planning decisions should:
- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 4.14 Section 12 'Achieving Well-Designed Places' confirms the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.15 Para 135 requires planning decisions to ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and

disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

- 4.16 Para 137 sets out that design quality should be considered throughout the evolution and assessment of individual proposals. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals would meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.
- 4.17 Section 14 'Meeting the Challenge of Climate Change, Flooding and Coastal Change' seeks the planning system to support the transition to a low carbon future, taking full account of flood risk and coastal change. Para 161 states the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.
- 4.18 Paras 162-182 require new development to be planned for in ways that:
- Avoid increased vulnerability to a range of impacts arising from climate change (para 164);
 - Help reduce greenhouse gas emissions (para 164);
 - Direct new development to areas with the lowest probability of flooding (para 170);
 - Apply a sequential, risk-based approach to the location of development (para 172); and
 - Ensure that new developments do not increase the risk of flooding elsewhere (para 181).
- 4.19 Para 187 states that when determining planning applications, local planning authorities should ensure development minimises impacts on and provides net gains for biodiversity.
- 4.20 Section 16 relates to conserving and enhancing the historic environment. Para 203 requires that in determining applications, Local Planning Authorities should take account of:
- b) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - c) The positive contribution that the conservation of heritage assets can make to sustainable communities, including their economic vitality; and
 - d) The desirability of new development making a positive contribution to local character and distinctiveness.

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- 4.21 Para 205 states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

ii) Local Planning Policy

Gravesham Local Plan Core Strategy (2014)

- 4.22 The Gravesham Local Plan Core Strategy covers the period from 1 April 2011 to 31 March 2028. It outlines the strategic objectives for the Borough based on the characteristics of the area and the key issues to be addressed. It also sets out a delivery strategy, identifies the areas where major change is likely to take place, allocates Key urban Sites for development, defines areas where policies of restraint will apply and those places or characteristics that will be preserved or enhanced.
- 4.23 **Policy CS01: Sustainable Development** states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF and Core Strategy. It confirms the Council will work proactively with applicants to find solutions which mean that proposals can be approved where possible and to secure development that improves the social, economic, and environmental conditions of the area.
- 4.24 **Policy CS02: Scale and Distribution of Development** sets out how development will be distributed within the Borough over the Plan Period. The policy seeks to make the most efficient use of previously developed land and focus development in the most sustainable locations. It also reflects local priorities to secure regeneration through the creation of new neighbourhoods and employment along the riverfront.
- 4.25 **Policy CS05: Gravesend Town Centre Opportunity Area** promotes a number of objectives for the Opportunity Area, including:
- Seek to improve pedestrian access between the town centre, the River Thames and surrounding areas and reduce the physical barriers created by the one-way system;
 - Manage traffic accessing and passing through the area through its approach towards the provision and distribution of public car parks;
 - Support improved public transport access, including the provision of an integrated
 - transport interchange at Garrick Street/Barrack Row;

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- Support and enhance retail, leisure, entertainment, cultural and tourism provision in accordance with the sequential approach;
 - Support the provision of new offices in accordance with the sequential approach, in particular where they have good access to the proposed integrated transport interchange;
 - Support the provision of new residential development where a satisfactory living environment can be achieved;
 - Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character; and
 - Support existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.

4.26 **Policy CS10: Physical and Social Infrastructure** states that support will be given to proposals and activities that protect, retain, and enhance existing physical and social infrastructure.

4.27 **Policy CS11: Transport** requires new developments to mitigate their impact on the highway and public transport networks as required. Transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking in new development will be provided in accordance with adopted parking standards.

4.28 **Policy CS12: Green Infrastructure** seeks to create, protect, enhance, and maintain a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones. The Policy also states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.

4.29 **Policy CS13: Green Space, Sport and Recreation** states that the Council will seek to maintain adequate provision for and to protect and enhance their quantity, quality and accessibility of green space, playing pitches and other sports facilities.

4.30 **Policy CS14: Housing Type and Size** states that the Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties. The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of the local need to create sustainable and balanced communities.

4.31 **Policy CS15: Housing Density** requires all new housing to be developed at a density that is consistent with achieving good design. This Policy states that the form and density of housing will vary across larger sites, in response to accessibility and other characteristics. Within the

urban area, new residential development will be expected to achieve a minimum density of 40no. dwellings per hectare.

4.32 **Policy CS16: Affordable Housing** requires affordable housing to be provided on all new housing developments of 15no. dwellings or more or on sites of 0.5 hectares or more in the urban area. The amount of affordable housing to be provided by private housing development sites above the threshold will be 30% in the urban area. The Council seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing through this Policy.

4.33 **Policy CS18: Climate Change** requires new development to:

- With the exception of previously developed sites along the Thames Riverside, Policy CS18 requires development to be directed sequentially to those areas at least risk of flooding. Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment
- Minimise the impact of surface water drainage from new development a waste water system by requiring SuDS Systems on all developments where technically and financially feasible and that surface water run off from new development has a as a minimum no greater adverse impact than the existing use
- all non-residential developments of 1,000sqm and above to meet the BREEAM 'excellent' standards of water efficiency and include provision for the collection of rainwater
- new development to consider the potential to include proposals for low carbon and renewable energy generation

4.34 **Policy CS19: Development and Design Principles** requires new development to be visually attractive, fit for purpose and locally distinctive. It will integrate well with the surrounding local area and incorporate sustainable construction standards and techniques. The policy sets out 13 bullet points of design criteria for new development which includes:

- The design, layout and form of new development to be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and character of the area. Account is required to be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings, the wider site context, topography strategic views and features of townscape and landscape value;
- Designed in an inclusive way to be accessible to all members of the community
- Car parking to be well related to the development it serves
- Safeguard the amenity, including privacy, daylight and sunlight of its occupants and those of neighbouring properties; and

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- Avoid adverse environmental impacts from pollution, including noise, air, odour, light pollution and land contamination.

4.35 **Policy CS20: Heritage and the Historic Environment** states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource. Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially within:

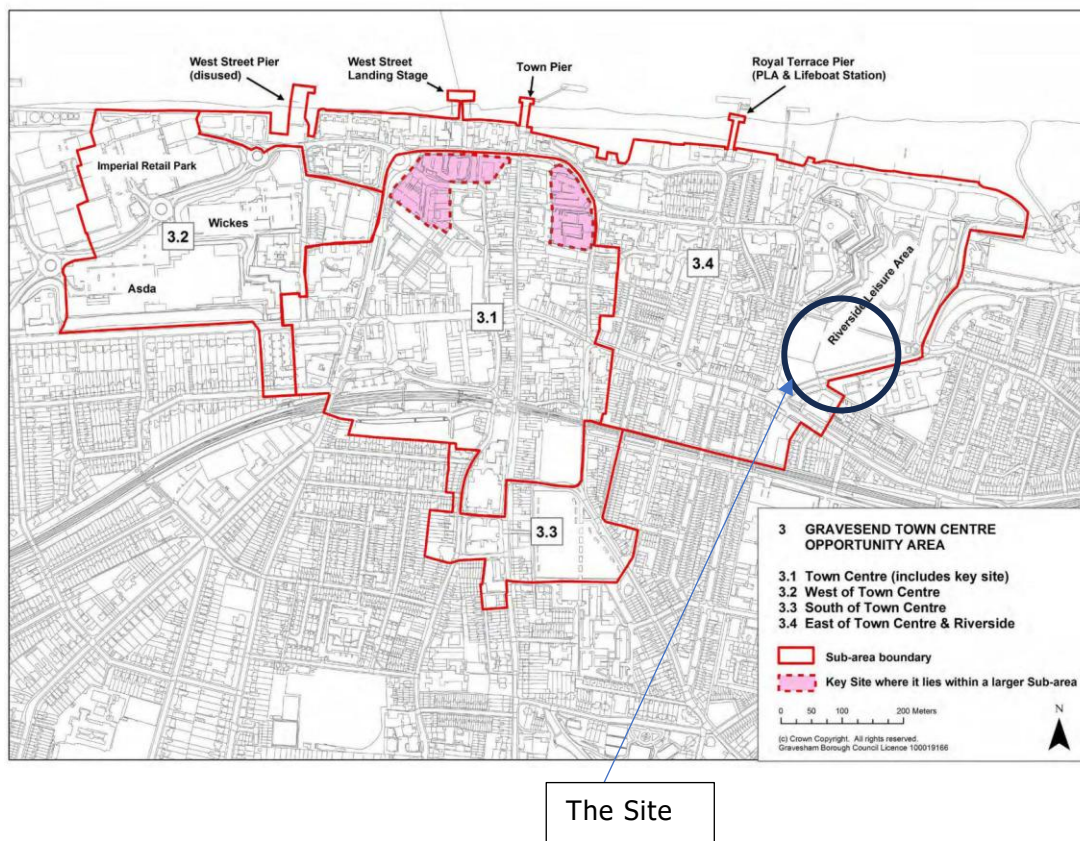
- Gravesend Town Centre, its development as a heritage riverside town, and its setting;
- The Borough's urban and rural conservation areas; and
- Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.

5.0 PLANNING APPRAISAL

i) Principle of the Development

Policy Context

- 5.1 The Site is located within the Gravesend Town Centre Opportunity Area as set out in Policy CS05. This Policy states that development of under-utilised sites within the urban area of Gravesham, and more specifically in the Gravesend Town Centre Opportunity Area, is acceptable in principle. This is due to the sustainable location of the area and the opportunity to make best use of previously developed land.



- 5.2 The pre-amble to the Policy includes the following:
- Some areas would benefit from public realm improvements and environmental enhancements for example Milton Road as an eastern gateway to the town
 - Sub area 3.4 is largely residential with pockets of land in employment and ground floor retail uses
 - Milton Road consists of a number of retail and restaurant uses at ground floor which form a local centre function.
 - The area has significant historic interest

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- The Riverside Leisure Area is a large open space forming an important part of the Gravesham Green Infrastructure network serving the local area and wider Borough. The area has benefitted from some improvements but there may be further opportunities.

5.3 Policy CS05 promotes a number of objectives for the Opportunity Area, as follows:

- Seek to improve pedestrian access between the town centre, the River Thames and surrounding areas and reduce the physical barriers created by the one-way system;
- Manage traffic accessing and passing through the area through its approach towards the provision and distribution of public car parks;
- Support improved public transport access, including the provision of an integrated transport interchange at Garrick Street/Barrack Row;
- Support and enhance retail, leisure, entertainment, cultural and tourism provision in accordance with the sequential approach;
- Support the provision of new offices in accordance with the sequential approach, in particular where they have good access to the proposed integrated transport interchange;
- Support the provision of new residential development where a satisfactory living environment can be achieved;
- Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character; and
- Support existing retail, commercial and service functions on the ground floors and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.

5.4 Development of under-used sites within the urban area of Gravesham and more specifically in the Gravesend Town Centre Opportunity Area is acceptable in principle given the sustainable location of the area and the opportunity to make best use of previously developed land as discussed below. The proposals therefore comply with policy CS05.

5.5 The Site is locationally sustainable, being well connected to Gravesend town centre by foot, cycle and public transport. Gravesend has wider connections to other areas of Kent and London by the high-speed railway line (HS1) and bus connections from the town centre. The proposals would therefore also accord with Local Plan Policies CS01 and CS02 which seek to direct new development to the most sustainable areas of the Borough, of which Gravesend is the primary settlement.

Previously Developed Land

- 5.6 The NPPF 2024 places a high importance upon the use of previously developed land. Section 11 of the NPPF focuses on the need for planning decisions to promote an effective use of land in meeting the need for homes and other uses.
- 5.7 Para 125 requires planning decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused. It is supportive of taking appropriate opportunities to remediate despoiled, degraded, derelict and contaminated land and taking the opportunity to achieve net environmental gains. Finally, it seeks decisions to promote and support the development of under-utilised land and buildings, especially if it would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.8 The Gravesham Core Strategy was adopted in 2014 and therefore significantly pre-dates the current version of the NPPF. However, Policy CS02 seeks to make the most efficient use of previously developed land and focus development in the most sustainable locations. It also reflects local priorities to secure regeneration through the creation of new neighbourhoods and employment along the riverfront.
- 5.9 Gravesham is an Authority which is constrained by Green Belt with approximately 77% of the Borough area designated as Green Belt. Gravesend is identified in the Core Strategy as being the most sustainable location in the Borough, with good access to public transport links, shops and services.
- 5.10 The Site is located in the urban area of Gravesend. A significant part of the Site is previously developed land, consisting of an existing car park and former BT storage depot. Part of the Site is currently set out as open space (further details below); however, arguably, the majority of the site has been previously developed due to the historic uses of the land which has previously hosted various buildings across the Site. Aerial images below from 1940 and 1960 show how the Site was previously developed:



1940



1960

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- 5.11 The development proposals offer the opportunity to provide housing to meet a significant need on an area of primarily previously developed land. The proposals would allow for the provision of higher quality open space together with Biodiversity Net Gain. The proposals would therefore be in accordance with Section 11 of the NPPF.

Loss of Open Space

- 5.12 The NPPF para 104 seeks to protect existing open space, sports and recreational buildings and land unless:
- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use
- 5.13 In reflection of the NPPF, Core Strategy Policy CS13 States the Council will seek to make adequate provision for and to protect and enhance the quality and accessibility of green space. Policy CS12 seeks the provision of a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones to be created, protected, enhanced and maintained. The network is to improve access within the urban area.
- 5.14 It is the Council's view that part of the Site, the grassland and skatepark to the east, are Open Space. As detailed above, Policies CS12 and CS13 seek to prevent the loss of existing open space and to ensure that new development makes adequate provision for the protection and enhancement of the quality and accessibility of green space.
- 5.15 The Council previously commenced review of its Local Plan and undertook a Stage 2 Regulation 18 Consultation from 23 October to 31 December 2020. As part of the Consultation the Council published a range of evidence documents including a Green Infrastructure Background Paper (October 2020) and a Strategic Housing Land Availability Assessment (SHLAA) (2020).
- 5.16 The SHLAA includes an assessment of the Land at Milton Place / Ordnance Road (Site Reference 138) and concluded:
- The site was 'available' for development as it was promoted by the Gravesham Borough Council

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- The Site was 'achievable' for development as there were no known constraints or abnormal costs associated with developing the Site that would render it financially unviable
 - The Site was 'suitable' for development subject to addressing the loss of open space.

- 5.17 It was envisaged that a development of approximately 100no. dwellings could be delivered, with a developable site area of 1.746ha of a total site area of 1.94ha.
- 5.18 Whilst this evidence document carries no weight as the Local Plan has not progressed, it does demonstrate that the site has previously been considered by the Council as a site that could host development of a scale similar to the proposals the subject of this application.
- 5.19 The Green Infrastructure Background Paper identified the Site at Figure 5.1 as amenity greenspace and makes reference to the Gravesham Borough Council Open Space Assessment (2016) for information in relation to the quality and quantity of open space.
- 5.20 The Open Space Assessment (2016) identifies the grassed area to the east of the Site as the Ordnance Road Open Space, which is an area of amenity green space. The Assessment finds that this amenity space is of low quality and low value.
- 5.21 The commentary in the Open Space Assessment for amenity green space states:

Most sites that rate low for quality are observed as being basic pockets of green space and lack ancillary facilities intended to encourage extensive recreational use.

Sites rating below the value threshold tend to be smaller grassed areas with no noticeable features. They provide some visual amenity to their locality and the main role of certain sites is to act as a grassed area, providing breaks in the urban form.

11no. sites rate low for overall quality and value. Where sites cannot be improved, they may be better suited to different forms of open space, or may even feasibly be surplus.

- 5.22 The amenity green space at Ordnance Road is primarily a grassed area. There is a bund to the east which adjoins the skate park; this bund is also laid to grass. Observation by the project team during site visits is that the space is used as an informal shortcut by pedestrians crossing from Ordnance Road to Milton Place or into the Riverside Leisure Area. Travelling fairs also use the land approximately 4 times per year. Otherwise, the amenity grassland has very little function other than a limited visual amenity. It is also understood from discussions at the public consultation that there are issues with antisocial behaviour in the skate park and on the Milton Place car park likely caused by the lack of overlooking or passive observation over these spaces.

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- 5.23 The open space sits adjacent to the Riverside Leisure Area which is considered within the Open Space Assessment as being an excellent site in terms of quality and value. However, the amenity greenspace at Ordnance Road is physically and visually separated from it by railings and a tree line. It therefore does not function as part of the wider park.
- 5.24 As identified within the Open Space Assessment, the low value and low quality amenity grassland areas have opportunity to be improved or to be put to different uses. There is significant opportunity with the development proposals to provide a function to the open space. There is also opportunity to better integrate the open space with the Riverside Leisure Area to the north both through landscape design and functionality. Development would help overlook the car park and skate park to decrease antisocial behaviour. All of which would improve the value and quality of the open space despite a quantitative reduction in the overall space.

Housing Land Supply

- 5.25 GBC are currently unable to demonstrate a five year housing land supply, with the latest 5 year Housing Land Supply Statement (published in March 2023) stating that the Council is only able to demonstrate a 2.9 year supply of deliverable housing from 2022-2027. The Housing Delivery Test results published on 12 December 2024 confirm that Gravesham Borough Council only delivered 59% of its housing requirement over the past 3-years and are therefore the 'presumption' in favour of sustainable development should be applied in decision making.
- 5.26 It is the case of this Planning Statement that the development proposals would comply with the adopted Development Plan even though policies relating to housing supply are out of date due to the lack of housing supply. The provision of affordable housing and the efficient use of previously developed land in a sustainable location should be offered significant weight in the overall planning balance.
- 5.27 This notwithstanding, the lack of housing land supply means that Paragraph 11(d) of the NPPF is also triggered and development should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 5.28 The proposals would make a significant contribution towards the delivery of new homes, including a high percentage of affordable homes, to meet a substantial deficit in housing supply in the Borough. As set out in previous sub sections of this Report, the Site is in a sustainable location, well connected to Gravesham town centre by foot, cycle and public transport. The proposals would make best use of land which has previously been developed and would make

effective use of land by maximising housing provision on areas of the site which are currently developed, and qualitatively enhancing the retained areas of open space.

5.29 Consequently, the proposals would accord with NPPF para 11(d).

ii) Affordable Housing and Housing Mix

5.30 The Gravesham Community Investment Partnership (GCIP) have a mandate to deliver 1,000no. new affordable homes by 2028 to help with the pressing need for housing in Gravesham. Gravesham Local Plan Policy CS16 requires the provision of 30% affordable housing on sites of 15 or more dwellings within the urban area.

5.31 The proposed development would offer approximately 80% affordable housing which significantly exceeds the policy compliant requirement of 30% affordable housing.

5.32 The development proposes the delivery of 61no. apartments, all of which are proposed to be affordable, tailored for the Later Living market (55+), consisting of 1-bedroom, 2-person units, with 8no. of dwellings to be M4(3) (wheelchair dwellings) compliant:

Number of Bedrooms	Number of Units
1B2P	53
1B2P M4(3)	8

5.33 The 15no. houses are to be provided as market housing with a range of housing types suitable for different household sizes and needs. The below table demonstrates the overall housing mix:

Number of Bedrooms	Number of Units
2B4P	2
3B5P	1
3B6P	11
4B7P	1

5.34 The development proposals would therefore provide a range and mix of dwelling types and exceed the affordable housing requirements in accordance with Policies CS14 and CS16 of the Gravesham Core Strategy.

iii) Design & Visual Impact

- 5.35 Paragraph 135 of the NPPF states that development should add to the overall character of the area and be visually attractive as a result of good architecture, layout and appropriate landscaping. Policy CS19 requires new development to be visually attractive, fit for purpose and locally distinctive. Gravesham Borough Council have also adopted a Design Code- Design for Gravesham to promote quality and sustainable development in Gravesham.
- 5.36 The supporting Design and Access Statement (DAS) sets out the design evolution of the proposals which have been developed in consultation with Gravesham Borough Council officers, Kent County Council officers and Historic England and incorporating feedback from the public consultation event.
- 5.37 The design principles take reference from the historic setting of the site, with the tallest buildings located on the corner of Milton Place and Ordnance Road. This provides a key gateway into the Conservation Area, providing a landmark building on a key corner on the way into Gravesham town centre and maximising development on the previously developed area of the Site.
- 5.38 Building heights step down in height from the corner along Milton Place and Ordnance Road with the lowest dwellings to the north, closest to the Scheduled Ancient Monument (SAM). This stepping in height was considered to be an important element of the setting of the heritage assets in discussions with Historic England and GBC's Conservation Officer.
- 5.39 The open space is designed to highlight the lines of fire which run diagonally across the open space. The landscape design provides pathways and planting to emphasise the alignment of the lines of fire
- 5.40 The car parking area to the north west is proposed to be reduced in size, informed by a parking survey of peak use, to provide parking to accommodate more than the maximum parking requirement identified in the survey The car park would be re-tarmacked, and the spaces would be re-painted. A new access would be created from Milton Place to the west and appropriate planting would be incorporated to soften the appearance of the car park.
- 5.41 Materiality of the buildings is a key consideration given the heritage significance of the local area. Selected materials are reflective of local buildings and draw through features such as metal railings and green colour detailing to windows and doors which are characteristic of Milton Place.

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- 5.42 The submission includes a Gravesham Design Code Compliance Checklist (In the Design and Access Statement) to demonstrate how the proposals achieve the high quality design aspirations for Gravesham Borough.
- 5.43 The proposals are therefore strongly rooted in local context, enhance the appearance of an existing under utilised site and would introduce high quality development to the benefit of visual amenity and the character and appearance of the streetscape.

iv) Residential Amenity

- 5.44 The Application Site is currently a car park and an area of open space, with residential properties to the west and south. The scheme has been designed to allow for sufficient separation distances to prevent any overlooking between new and existing properties. Windows serving habitable rooms have been avoided where there is a possibility of overlooking.
- 5.45 Gravesham have adopted Residential Layout Guidelines (Amended June 2020) which require dwellings to meet the Nationally Described Space Standards (NDSS) and set requirements for the size of private amenity space and back to back distances.
- 5.46 The proposed affordable dwellings are designed to comply with or exceed the Nationally Described Space Standards (NDSS) and would therefore provide adequate internal accommodation for future residents. The houses would be served by rear gardens generally in compliance with the Gravesham Residential Layout Guidance, providing external amenity space for future residents to enjoy which would be beneficial to their residential amenity. The apartments would be served by a communal roof terrace accessible to all residents. The Site is also located close to substantial areas of open space, offering the opportunity for residents to use and enjoy.
- 5.47 The development would therefore not cause harm to the residential amenity of the neighbouring residential dwellings or the future amenity of occupants of the proposed dwellings. This would be in accordance with Policy CS19.

v) Landscaping

- 5.48 Landscape design has been a fundamental element in the development of proposals for the application site. The landscape architect has been involved with the design development throughout pre-application discussions to create a landscape-led approach. The development proposals would result in the quantitative loss of open space; however, this space is currently primarily set out as grass and occasionally used for football matches, or to host a travelling funfair. It is therefore qualitatively of relatively low quality.

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- 5.49 The landscape proposals are strongly influenced by the historic setting of the Site, with the gun lines of fire represented within the soft and hard landscaping in the area of open space. The open space incorporates areas of new planting, provision of Sustainable urban drainage, heritage interpretation and offers biodiversity net gain benefits. It would therefore provide a high quality multi functional use, substantially increasing the quality and value of the open space provision on site.
- 5.50 The landscape design provides a delineation between the public and private spaces through the use of boundary planting and boundary treatments such as railings. The private areas around the houses would be verdant and would positively contribute to the sense of place.

vi) Heritage

- 5.51 Paragraph 200 of the NPPF states that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by the proposed development.
- 5.52 A Heritage Statement has been submitted alongside the application which assesses the potential impacts of the proposed development on the significance of relevant designated and non-designated built heritage assets. The design has evolved with the input of the Conservation Officer at GBC, and Historic England throughout the pre-application process
- 5.53 Historically, the Site was partially occupied by a Church on the southwest corner; a school; and, at a later stage, an open air swimming pool and municipal buildings. It forms an important gateway into Gravesend Town Centre and sits in an area which is of historical interest.

Scheduled Monument

- 5.54 The Site lies to the south of and within the setting of the New Taven Fort which is a Scheduled Monument and Grade II* Listed. The Historic Environment Impact Assessment (HEIA) considers the significance of the setting of the Fort which was constructed in a tactical location on the river and opposite Tilbury Fort.
- 5.55 From pre-application discussions with Historic England it is understood that Historic England consider the site of importance to the historic setting of the Fort. Historic England explained that the site would have historically been open to prevent places for the enemy to hide on approach to the fort. The HEIA sets out that contrary to Historic England's assertions, the Application Site and the New Tavern Fort were formerly part of a c.12ha parcel of land under the ownership of the Board of Ordnance in the late 18th to early 19th centuries. At this time, the Application Site appears to have limited use associated with the fort, at most providing an

open space to oversee from the gun emplacements for training purposes. For this reason, the study site is not considered to form a major contribution to the significance of the scheduled fort.

- 5.56 There are 2no. barbette emplacements for guns on traversing platforms designed to facilitate a wide arc of fire. These were installed on the south of the principal batteries in 1868 as a practice battery to train artillery volunteers for the use of the main guns. The emplacements remain on the Fort but in a poor state of repair. As part of the pre-application discussions, Historic England identified the site lines of these guns as being an important element of the setting of the Fort. Consequently, the development proposals include historic reference to the rear training guns in the design of the layout and heights of the proposals.
- 5.57 Whilst the study site currently forms open space, including a carpark and derelict land, it has historically contained development (church, school and leisure buildings) and the reintroduction of built form to the site is not incongruous with the site's history. The proposed development would also be set back from the edge of the scheduled area to provide a significant buffer. The proposals also allow for the stepping down in height of the new buildings to ensure that a sense of space is maintained and the Fort is not dominated by the new development.
- 5.58 With these measures in place and with appropriate detailing of the final design, it is considered that the development can be achieved whilst causing no harm to the significance of the Scheduled Monument.

Listed Buildings

- 5.59 The Site is located opposite Gordon House and Milton House and 14 Milton Place, all of which are Grade II Listed Buildings. There would be intervisibility between the Listed Buildings and the proposed development; however, due to the location of the built development on the Site the proposals would not block views of their facades or impact the immediate sense of openness opposite.
- 5.60 It is therefore considered that due to the design and detailing of the proposed development, together with improvements to the landscaping around the car park, the changes to the setting would not result in any harm to the significance of the Listed Buildings.

Conservation Areas

Gravesend Riverside

- 5.61 The Site is located within the Gravesend Riverside Conservation Area. Parts of the Site are currently considered to be a negative element within the Conservation Area with the remainder forming neutral elements.
- 5.62 The proposed development is sited in areas that have historically contained development. The scale of the proposals reflects the historic development of the site with the tallest element in the south western corner, stepping down in scale to the east. The eastern side of the site would remain open.
- 5.63 The layout and massing of the development channel views of the elements of the Conservation Area that best display its special interest. The proposed landscaping would enhance the historical interest of the Conservation Area by highlighting the Fort's rear gun splays, enhancing the buffer around the car park and improving the appearance of the entrance to Fort Gardens.
- 5.64 The proposed development, therefore, has potential to improve the condition of an underused portion of the conservation area and, with its considered design and detailing, presents an enhancement to its character and appearance

Milton Place

- 5.65 The Site is located immediately adjacent to the Milton Place Conservation Area and therefore falls within its setting. As detailed previously, the Site has previously contained built development and the Conservation Area Appraisal notes there is a lack of sense of enclosure to the southern end of Milton Place.
- 5.66 The proposed apartment block would provide a gateway to frame and channel the positive view from the Milton Place/Ordnance Road junction. It has also been designed to reflect the historical residential use and incorporate key elements of the architecture and materials visible in the townhouses along the west side of Milton Place.
- 5.67 The sense of openness to the east of Milton Place would be maintained with the retention of the existing car park and would be enhanced by the provision of landscaping to improve what is currently a negative element of the setting of the Conservation Area.
- 5.68 As a consequence, whilst there would be a change to the setting of the Conservation Area, there would be no harm to its heritage interests.

Non-Designated Heritage Assets

- 5.69 The Heritage Statement also considers the impact of the proposals upon the 12no. non designated heritage assets which are listed in the Milton Place and Gravesend Riverside Conservation Area Appraisals. The Report finds that 10no. of those assets are not sensitive to future development on the Site. The proposed development would have an impact on the setting of these assets but the impacts have been minimised by the detailed design of the proposals and there would be no harm caused.

Sub Surface Archaeology

- 5.70 The Site has been previously developed which has caused significant truncation of below ground archaeological remains during the construction works over the 19th- 21st centuries. The Heritage Statement finds that there is no evidence to suggest that the Site contains archaeological remains of sufficient importance to preclude or constrain development.

vii) Highways

- 5.71 Advice has been sought from the Parking and Environmental Enforcement Services Manager at Gravesham Borough Council and the Local Highway Authority (KCC Highways) prior to the submission of this application (pre-application meeting 2). The parking provision, access arrangements and vehicular movements have been informed by the pre-application discussions with these parties.
- 5.72 The proposals include the reduction in an existing area of public surface car parking from 148no. spaces to 84no. spaces and the Ordnance Road car park would be reduced by 3no. spaces to 27no. spaces. This reduction in parking is supported by a study into the use of the existing public car parks within Gravesend and specifically the car park occupancy data analysis for Milton Place and Ordnance Road car parks. The retained car parking would be sufficient to serve the maximum occupancy of the car park.
- 5.73 As part of the proposals, the existing Ordnance Road access into the Milton Place car park would be closed off and the Khartoum Place access to the north would be re-opened and would include a new pedestrian footway connection. The Ordnance Road car park access would not be altered.
- 5.74 As part of the pre-application discussions, Gravesham Borough Council identified that a funfair operates from the open space 4no. times per year. This funfair would be moved into the Riverside Leisure Park to the north; however HGVs would need to traverse through the Site to access the new funfair location. The submitted layout drawings include a route for HGV access

through the retained car park and through an existing access point into the Riverside Leisure Area to the north. As part of these access arrangements, some of the parking spaces within the retained public car park would need to be temporarily closed off. GBC Parking Services have confirmed that they would be able to manage this access arrangement.

- 5.75 Vehicular access to the residential development would be taken from Milton Place via a new junction. This junction would provide the required visibility splays and has been designed to accommodate refuse and emergency vehicles.
- 5.76 Pedestrian and cycle connectivity across the Site has been carefully considered and the proposals include a pedestrian / cycle link between the Milton Place car park and Ordnance Road to provide connectivity to areas to the south of the site including the primary school.
- 5.77 GBC utilises the maximum parking standards set by KCC and set out in SPG4. The vehicular parking standards for dwellings are set out below:

Bedrooms	Maximum Car Parking
1 bedroom	1 space per dwelling
2 and 3 bedroom	2 spaces per dwelling
4 or more bedrooms	3 spaces per dwelling
Sheltered accommodation	1 space per resident + 1 space per 2 units

- 5.78 For the apartment building, 8 unallocated parking spaces are provided for the 61 later living homes, equating to 0.13 spaces per home. This provision reflects the reduced car dependency typically associated with later living developments whilst meeting policy goals of discouraging use of the private car.
- 5.79 For the houses, 2 parking spaces per home are allocated for plots 01–04, whilst 1 space per home is allocated for plots 05–15. These allocations are designed to provide a diverse mix of parking options whilst balancing these resident needs with efficient land use.
- 5.80 The development proposals would provide car parking below the quantum permitted by the above maximum standards. This approach is considered appropriate in the context of the town centre location with access to a variety of services and amenities by active and sustainable modes of travel.

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- 5.81 There are no specific adopted standards in relation to electric vehicles; however, all houses will be equipped with provisions for individual electric vehicle charging points and communal charging points will be available within the parking areas serving the apartments.
- 5.82 It has been agreed with the GBC Parking and Environmental Enforcement Services Manager that there would be 5% provision of disabled spaces, and the 3no. BP Pulse EVP chargers located to the south west of the car park would be re-provided.
- 5.83 Cycle parking would be accommodated within 2no. shared cycle stores for the apartments which would provide 54no. cycle spaces. A further 8no. Sheffield stands would be provided outside of the building for use by visitors. The houses would benefit from cycle storage in the rear gardens for the dwellings.
- 5.84 The proposals are predicted generate circa 16 vehicle movements (equating to 1 vehicle every 3.75 minutes) in either traditional network peak hour. In this context, the proposals predict would not result in an impact on the highway network that could be considered to be severe in the context of the NPPF.
- 5.85 The proposed scheme is in accordance with KCC SPG4.

viii) Ecology & Trees

Ecology

- 5.86 This application is supported by an Ecological Impact Assessment (EIA) undertaken by James Blake Associates Ltd. The EIA finds that the majority of the site comprises amenity grassland with hardstanding consisting of car parking areas, pathways and a skate park area, boundary trees, and shrubs. It therefore concludes that no further species specific surveys are required; however, precautionary measures for vegetation clearance in relation to active bird nesting should be followed in full.
- 5.87 Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) makes Biodiversity Net Gain (BNG) a mandatory requirement for new development in England. Development must deliver a BNG of 10% to ensure that proposals would result in more or better quality natural habitat than there was before development.
- 5.88 The application is supported by a Biodiversity Net Gain Assessment to consider the impact of the development upon biodiversity. The BNG Assessment concludes that the proposals would result in a net gain in biodiversity of 18.11% for habitat units and 836.20% for linear hedgerow

units. This is achieved through the planting of wildflower meadows, mixed scrub, 97no. new trees and hedgerow planting.

Trees

- 5.89 The central portion of the Site is currently generally open land with minimal trees; however, the boundaries of the Site include a range of trees of various variety and size. All trees on site have been the subject of a tree survey undertaken by Tracey Clarke Tree Consultancy.
- 5.90 The Arboricultural Assessment includes 49no. individual trees and 4no. groups of trees and finds that there are 3no. poor quality, 29no. low quality and 21no. moderate quality and value trees. There are no high value, veteran or ancient trees on or adjacent to the site.
- 5.91 The proposals include the loss of 9no. individual trees and 2no. groups to facilitate the development. Of the trees to be removed, all are considered low value (Class C or U) due to their condition, inappropriate location, limited remaining life expectancy or young age. All of the high quality and value trees are to be retained by the development proposals.
- 5.92 The landscape proposals include the planting of 97no. individual trees together with other tree species within hedgerows throughout the site. The retention of the existing higher quality trees together with the planting of new trees would help integrate the built form onto the site and would positively enhance the existing local landscape character.

ix) Flood Risk and Drainage

- 5.93 The Site is located in Flood Zone 1 and therefore at a low risk of flooding; however, as the Site is over 1ha in size the application is supported by a Flood Risk Assessment, prepared by PTA.
- 5.94 The Flood Risk Assessment identifies that the Site is at low risk of flooding from rivers, the sea, and ground water. There is a small area in the centre of the open space which has some risk of flooding from surface water; however, it is intended that this area of the site will be raised which will reduce the flood risk. This notwithstanding, the affected area is located in the proposed open space.
- 5.95 The development incorporates surface water drainage. Surface water runoff from the hardstanding areas and roofs would be collected via rainwater pipes, drainage channels and road gullies before being conveyed via underground pipe network to an attenuation basin the soft landscaped area of the Site.

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- 5.96 The surface water drainage network has been designed to accommodate all storms up to and including the critical 1:100 year + 45% climate change design storm without any onsite or offsite flooding.
- 5.97 The foul drainage would flow by gravity in an underground pipe network that runs through the development before ultimately discharging into Southern Water's public sewer that exists under Ordnance Road to the south of the development.
- 5.98 The development proposals are therefore not at an unacceptable risk of flooding, incorporate sustainable drainage features, would make adequate provision for foul drainage and would not result in an increased risk to flooding off site.

x) Contamination

- 5.99 As a result of previous uses of the Site, this application is supported by a Phase 2 Geo-Environmental Assessment, prepared by Create Consulting Engineers Ltd. The report recommends the following:
- Given the presence of demolition materials, contaminants of concern and the likely presence of asbestos-containing materials, further site investigation should be undertaken to determine the nature and extent of contamination present.
 - If the material is to be retained, remediation works would be required to mitigate exposure risk to future site residents, particularly in private gardens and soft landscaped areas.
 - A remediation method statement would need to be prepared to detail the proposed remediation works and outline the validation process to render the Site suitable for residential use
 - Some form of ground improvement in areas of proposed hardstanding may be required, in the form of lime/cement stabilisation or the use of a geogrid
 - If significant earthworks are required on removal of any below ground structures, targeted laboratory geotechnical testing would be recommended and a detailed earthworks specification prepared.
- 5.100 Contamination can be addressed through appropriately worded condition to ensure that remediation is undertaken ahead of any development being undertaken on the Site.

xi) Noise

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- 5.101 The Site is located adjacent to Ordnance Road and on a busy road junction at a gateway location into the town centre. There is therefore potential for noise disturbance to be caused as a result of vehicular movements on the road network. This application is supported by an Environmental Noise Assessment produced by Ian Sharland Ltd which considers the impact of noise upon both the proposed dwellings and their private amenity space to establish whether a suitable noise climate can be achieved in accordance with British Standard (BS) and World Health Organisation (WHO) guidance.
- 5.102 The Environmental Noise Assessment finds that the predicted external noise levels exceed the limits set out in ADO Overheating for about 75% of the flats and all of the houses with windows open. The affected properties are those fronting onto Ordnance Road and Milton Place, and those dwellings fronting onto the proposed open space. It is possible that houses 1-4 & 12-15 could adopt an open window strategy for bedrooms on the north facades of each house.
- 5.103 The Assessment therefore recommends that all properties where predicted noise levels exceed the limits in ADO include a Mechanical Ventilation Heat Recovery (MVHR) system with acoustic trickle vents (or equivalent, mechanical solution), designed to counter any overheating issues. This would allow the windows to be kept closed and appropriate ventilation to be provided to the dwellings. It is not proposed to fix the windows shut to allow future occupants the option of opening the windows if they wish to.
- 5.104 Overall, it is concluded that, with the recommended measures in place, occupants of new properties can be provided with an acceptable acoustic environment using very practicable methods of construction.
- 5.105 In relation to the garden areas, suitable external noise levels in compliance with the requisite guidelines can be achieved for all gardens with the exception of plot H-10 where there is a minor exceedance due to the orientation of the garden which sits side-on to Ordnance Road. Whilst the noise levels are marginally higher than the guidelines, a balance needs to be struck between the benefits of providing a garden, the design of the scheme and how it sits in its context and the impact of noise upon the future occupants. The British Standard Guidance and the National Planning Policy Guidance recognise that in urban areas the benefits of providing outside space, even in higher noise climates, can outweigh any disadvantages of higher noise levels. In this case, given the small exceedance of one garden, it is considered that the overall harm to future residential amenity would be limited.

xii) Sustainability

5.106 Paragraph 159 of the NPPF states that new development should avoid increased vulnerability to the range of impacts arising from climate change. The proposed development includes a range of sustainability measures as follows:

- Each house would have an air source heat pump with internal hot water cylinder, under floor heating to the ground floor and wet panel radiators to the upper floors
- Each house would have electric mechanical ventilation fans to each floor and acoustic trickle vents to prevent overheating
- Each apartment would have an air source heat pump and electric panel radiators
- The apartments would have a centralised electric mechanical fan, and each apartment will have acoustic trickle vents to avoid overheating
- Each dwelling would have an electric vehicle charging point
- Residents would have access to external amenity space either in the form of a roof garden (apartments) or private garden
- Cycle storage would be provided for each apartment and dwelling to encourage the use of cycles
- The Site is in close proximity to public transport links together with opportunities to walk and cycle into Gravesend town centre. The site includes opportunities to encourage cycling including the provision of pathways across the site which are suitable for cycle use.
- Solely north facing dwellings have been avoided to allow natural lighting to properties and dual aspect apartments have been incorporated where possible.

xiii) Air Quality

5.107 The Site frontage is located in an Air Quality Management Area (AQMA) which runs along Ordnance Road. An Air Quality Assessment Report produced by KP Acoustics considers the impact of the development upon local air quality and the impact of air quality upon future residents of the Site.

5.108 The Air Quality assessment undertakes dispersion modelling to predict pollutant concentrations and sensitive locations as a result of emissions from the local highway network with and without the development in place. The results show that impacts on annual mean NO₂, PM₁₀ and PM_{2.5} concentrations as a result of traffic generated by the development were predicted to be negligible at all receptor locations.

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- 5.109 The results of the dispersion modelling assessment also indicated that predicted annual mean NO₂, PM₁₀ and PM_{2.5} concentrations were below the relevant AQOs and Concentration Target across the development, including within the partial AQMA area across the site. The site is therefore considered suitable for the proposed use from an air quality perspective. No additional mitigation measures, such as sealed windows or mechanical ventilation would be required at any location throughout the development due to air quality issues.
- 5.110 During the construction phase of the development there is the potential for air quality impacts construction dust emissions from the site. Site-specific dust control measures are proposed and subject to implementation, air quality impacts from dust generated by earthworks, construction and trackout activities are predicted to be not significant.
- 5.111 Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 (the "2004 Act") confirms that, planning applications are to be determined in accordance with the Development Plan unless material circumstances dictate otherwise.
- 6.2 The proposals would be located in the urban area of Gravesend, in the Town Centre Opportunity Area where the principle of redevelopment of previously developed land in sustainable locations is supported by Core Strategy Policies CS01, CS02 and CS05.
- 6.3 The Site is well located in relation to access to shops and services via a range of transport methods including foot, cycle and public transport. Some of the site currently hosts built development, the central portion of the Site is currently laid out as open space; however, the site as a whole has been historically developed as evidenced by aerial photography and an analysis of the Site history. The proposals would therefore provide the opportunity to redevelop previously developed land in a central town centre location in accordance with Policies CS01, CS02 and CS05.
- 6.4 In terms of loss of open space, the Council has previously assessed the open space as being low quality and low value. It has also previously identified that the site might be suitable for a development of up to 100no. houses. The proposals offer the opportunity to significantly improve the value and quality of the open space, integrating it into the Riverside Leisure Area to the north and enhancing the multi functional use of the space. This would accord with NPPF para 104 and Core Strategy Policies CS12 and CS13.
- 6.5 The Council is currently unable to demonstrate a 5 year housing land supply and is in the 'presumption in favour of sustainable development' as part of the Housing Delivery Test. The proposals would deliver 76no. new homes to meet significant housing needs and 80% affordable homes. The proposals would represent a sustainable form of development and notwithstanding the assertion that the proposals would comply with Development Plan Policy, planning permission should also be granted in accordance with the tilted balance in favour of sustainable development as set out in NPPF para 11d.
- 6.6 Design, heritage and landscape design have been fundamental to the development of the proposals. The Applicant has proactively engaged in pre-application discussions with the Local Planning Authority, technical consultees and Historic England. The NPPF and Local Plan Policy (including the adopted Design Code) place substantial emphasis on the delivery of high quality,

visually attractive and locally distinctive development. The proposals are strongly rooted in local context, drawing reference from the historic environment in architectural design, landscape and layout. The proposals have been developed in consultation with the Council, Historic England and the public through the public consultation exercise. The design proposals would therefore comply with Policy CS19 and NPPF para 135.

- 6.7 The application is accompanied by an HEIA which considers the impact of the proposals upon the local designated and non-designated heritage assets. The HEIA concludes that the proposals would either cause no harm, or in the case of the Gravesend Riverside Conservation Area, provides an opportunity to enhance, the character, appearance and setting of the assets.
- 6.8 The reduction in size of the Milton Place car park has been evidenced by parking survey data and ANPR recordings to provide for the maximum parking requirement. EVPs and disabled parking have been integrated into the car park as required by Gravesham Borough Council Officers. The car park is also able to accommodate the tracking of fairground vehicles to allow access to the Riverside Leisure Area to the north as requested.
- 6.9 The residential area of the Site provides adequate parking reflective of the sustainable location of the site with excellent access to public transport. The layout of the site accommodates walking and cycling, providing cycle parking and integrated pedestrian connections across the Site. This would help encourage the use of methods of travel other than the private car.
- 6.10 The Site is at low risk of flooding from all sources, with a small area within the open space currently marginally impacted by surface water flows. The proposals provide sustainable drainage through the provision of a SUDS attenuation basin in the open space. There is adequate capacity within the local foul water system to accommodate flows from the development. The proposals would therefore not put the development at unacceptable risk to future flooding or increase the risk of flooding off site.
- 6.11 The proposals would provide an 18.11% BNG for habitats, 836.20% net gain for linear features and would retain all of the higher quality and value trees on site. The proposals incorporate sustainable technologies and would ensure that future residents are not put at risk of issues of undue noise or air quality.
- 6.12 As such, the proposals would comply with the NPPF and adopted Development Plan Policy and should therefore be approved.