

Delegated Report

Householder Planning Application

Planning Application No: 20250479

Location: Land at St Albans Close, Gravesend, Kent DA12 5SE

Description: Erection of 8 Solohaus self- contained modular homes for temporary homeless accommodation with associated plant, bin and bike stores and landscaping

Applicant: The Hill Partnership

Site Visit Date: 26/08/25

Submitted Documents/Plans

Application Form
SAP Report for Building Regulations Compliance
Desktop Utility Search
Carbon Emissions Reduction Statement
Assessment of Air Source Heat Pump Noise
Planning Statement
17906_R01_Biodiversity Net Gain Assessment
17906_Biodiversity Net Gain Metric
109-133-PA-001 Site Location Plan
109-133-PA-002A Proposed Site Layout
109-133-PA-003A Proposed Ground Floor Plan
109-133-PA-004A Proposed Roof Plan
109-133-PA-005A Fire and Refuse Distances
109-133-PA-006 Cycle Store – Plans and Elevations
109-133-PA-007 Refuse Store – Plans and Elevations
109-133-PA-008 Block A Elevations
109-133-PA-009 Block B Elevations
10164-PTA-XX-XX-DR-C-9100 Rev P01 Proposed Drainage Layout
10164-PTA-XX-XX-RP-C-9071 Rev P01 Flood Risk Assessment and Drainage Strategy Statement

0000-HF-000-00-DR-BC-0001 Rev C08 Floor Plan and Roof Plan
0000-HF-000-00-DR-BC-0002 Rev C12 Elevations
0000-HF-000-00-DR-BC-0006 Rev C04 3D Visuals
0000-HF-000-00-DR-BC-0007 Rev C01 3D Visuals and Floor Plan

Superseded plans

~~109-133-PA-002 Proposed Site Layout~~
~~109-133-PA-003 Proposed Ground Floor Plan~~
~~109-133-PA-004 Proposed Roof Plan~~
~~109-133-PA-005 Fire and Refuse Distances~~

Relevant Planning History

There is no relevant planning history for this application.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 8 – Promoting Health and Safe Communities (para 104)
- Section 11 – Making Effective Use of Land
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

Designing Out Crime Team

Received on 23/05/25

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance the National Planning Policy Framework (NPPF).

Applicant/ agents should consult us as Designing Out Crime Officers to address CPTED and incorporate Secured by Design (SBD) as appropriate. We use details of the site, relevant crime levels/ type and intelligence information to help design out the opportunity for crime/ fear of crime, anti- social behaviour, nuisance and conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet out Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces around the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.
2. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways to have secure side gates, which are lockable from both sides, located flush to the front building line.
3. To meet SBD guidance, we would strongly recommend the installation of pavements on both sides of the roads to avoid vehicle and pedestrian conflict and promote safer spaces for families. It is now common practice to have some shared vehicle/ pedestrian areas on secondary routes. If pavements cannot be installed in these shared spaces, we strongly recommend traffic calming measures, especially where there is a curvature in the road.
4. Parking – to help address vehicle crime, security should be provided for motorbikes, mopeds, electric bikes and similar. SBD or solid secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an “active” window eg, lounge or kitchen, and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays and avoid conflict and misuse. If cars ports are unavoidable, we recommend they be lit and painted in a light colour to optimize surveillance opportunities. For cars parks, we recommend the Safer Parking Scheme, which follows CPTED guidance from both the Police and the British Parking Association.
5. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees are more suitable than “round-shaped” trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than one metre, so they do not obscure vulnerable areas.
6. Lighting – please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer, particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided; SBD Homes Guide 2024 states; “19.3 Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result, causes an increase in the fear of crime. It should be avoided”. Lighting of all roads including main, side roads, cul- de- sacs, and car parking areas, should be to BS5489-1: 2020 in accordance with SBD and the British Parking Association Park Mark Safer Parking Scheme specification and standards.
7. All external doorsets including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note PAS 24 is a minimum security standard, and communal doors may require a higher standard, such as STS or LPS.

8. Windows on the ground floor or potentially vulnerable eg, from flat roofs or balconies to PAS 24: 2022 UKAS certified standard, STS 204 Issue 6: 2006, LPS 1175 Issue 8: 2018 Security Rating 1/A1. Glazing to be laminated, toughened glass alone is not suitable for security purposes.
9. For cycle storage, we advise on the use of ground/ wall SBD or sold secure anchors within a lockable shed or storage area. Bin storage must also be secure with access control.
10. Mail delivery to meet SBD TS008 with a fire guards are strongly recommended for dwellings.
11. Defensible spaces. Corner properties require well established boundaries to avoid desire lines across front gardens. This can be provided by using hedges or knee rails/ fences, for example.
12. Blank walls. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, inappropriate loitering and ball games. The provision of a one metre buffer zone using either a 1.2m – 1.4m railing or a one metre high hedge with high thorn content should address these issues.
13. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing a nuisance.
14. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict or ball games causing nuisance. For any LAP or LEAP, we recommend fencing to a minimum height of 1.2m and vandal resistant play equipment. Consideration should be given to a single dedicated entry and exit point to enable adult control/ supervision.

Management office if proposed

15. All external doorsets including folding, sliding, or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note, PAS 24 is a minimum security standard, and communal doors may require a higher standard, such as STS or LPS.
16. Windows on the ground floor or potentially vulnerable eg, from flat roofs or balconies to PAS 24: 2022 UKAS certified standard, STS 204 Issue 6: 2006, LPS 1175 Issue 8: 2018 Security Rating 1/A1, , STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated, toughened glass alone is not suitable for security purposes.
17. CCTV is advised, especially at entry points, and other areas with limited natural surveillance or storage areas containing high- value equipment. Please ensure the CCTV supports the lighting plan.
18. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
19. Waste bins should be kept in a secure enclosure, ideally away from the building as bins can become a climbing aid or even an arson hazard.

If approved, site security is required for the construction phase. There is a duty for the principal contractor “to take reasonable steps to prevent unauthorised person to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be specific to geography and site requirements.

We welcome a discussion with the applicant/ agent about site specific designing out crime. If the above points are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCOs and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

KCC Heritage

Received on 23/05/25

The site lies within an area of multi- period archaeological potential. However, based on existing Historic Environment Record data for the area and the relatively limited extent on the proposed works, I consider it unlikely that these proposals would have a significant below- ground archaeological impact and have no further comments to make in this case.

KCC Flood and Water

Received on 28/05/2025

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangements put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving one or more of the following;

- a) the winning and working of minerals or the use of land for mineral- working deposits;
- b) waste development;
- c) the provision of dwellinghouses where;
 - i) the number of dwellinghouses to be provided is 10 or more;
 - ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls with sub- paragraph c) i);
- d) the provision of a building or buildings where the floorspace to be created by the development is 1,000sqm or more; or
- e) development carried out on a site having area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

KCC Fire and Rescue

Received on 29.05.2025

Upon reviewing the plans on the Gravesham planning portal, I note that the fire and refuse distances (drawing 109-133-PA-005), where hose lay to the four southern modular homes appear just within the 45m and therefore acceptable. However, I would like to point out that hose lay distances to the furthest home in the northern section will extend slightly from the plan drawing. Our fire crews would inevitably use the steps by the grass bank, which would extend hose lay by a short distance, therefore please take this into consideration.

Please be aware that should this proposal be successful, it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under Section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Public Rights of Way

Received on 04/06/2025

A new water connection for the proposed modular homes, planned to run from the existing Southern Water foul water manhole near 70 Winchester Crescent, is indicated on the Drainage Layout Plan to cross the northern section of Public Right of Way NGX28. This will impact NGX28, which otherwise runs in a southerly direction from Winchester Crescent through St Albans Close Open Space. Technical advice will also be sought on crane access for delivering the modules. To ensure the safety of pedestrians who will be using Public Right of Way NGX28, please ensure at least eight weeks' notice is given for any temporary closure of the path, subject to the conditions outlined below. I enclose a copy of the Public Rights of Way network map showing the line of the path for your information.

The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt, the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary enclosures be required to ensure public safety, then this office will deal on the basis that:

- The applicant pays for the administration costs
- The duration of the enclosure is kept to a minimum
- Alternative routes will be provided for the duration of the enclosure
- A minimum of eight weeks' notice is required to process any applications for temporary closure.

This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any buildings materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.

Natural England

Received on 11/06/2025

Natural England is a non- departmental body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The proposed development has the potential to have a harmful impact on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Designated Sites

Further Information is required – recreational pressure impacts to European Sites (habitats sites)

This development is within the zone of influence (ZoI) for recreational pressure impacts to one or more European Sites (habitats sites). Within the ZoI, proposals for any net increase in residential units will likely have a significant effect on the qualifying features of the European Site(s) (habitat site(s)) through increased recreational pressure when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s). Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the Natural England Access to Evidence – Conservation Objectives for European Sites and in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on integrity of the European Site(s) (habitats site(s)) in relation to recreational disturbance. Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/ removal/ variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Species and Habitats Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service.

Impact Risk Zones for Sites of Special Scientific Interest.

We strongly recommend that Local Planning Authorities use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal

(arcqis.com) and to use on MAGIC (defra.gov.uk) along with the guidance) to decide when to consult Natural England on development proposals that might affect an SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal e mail consultation on some development proposals, reducing unnecessary delays in the planning process. In turn, this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning – GOV.UK (www.gov.uk) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Annex A – Natural England general advice

Protected landscapes

Paragraph 189 of the NPPF requires great weight to be given to conserving and enhancing scenic beauty within Areas of Outstanding Natural Beauty (AONB; known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (including LPAs) to seek to further the statutory purposes of a National Park, the Broads or an AONB in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting upon its natural beauty.

The LPA should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider Landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. The application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment – Landscape Institute – for further guidance.

Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on local planning authorities to conserve and enhance biodiversity as part of its decision- making.

Designated Nature Conservation Sites

Paragraphs 193- 195 of the NPPF set out the principles for determining applications impacting on SSSIs and habitats sites (SACs and SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site and Natural

England must be consulted on 'appropriate assessments'. Natural England must also be consulted where development is in or likely to affect an SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified.

Protected Species

Natural England has produced Protected Species and Development: Advice for Local Planning Authorities to help the planning authorities understand the impact of a particular development on protected species.

Natural England will only provide bespoke advice on protected species where they form part of an SSSI or in exceptional circumstances. A protected species license may be required in certain circumstances. We refer you to Wildlife Licences: when you need to apply for more information.

Local Sites and Priority Habitats and Species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sights and improve their connectivity and to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environment records centre, wildlife trust, geoconservation groups or recording societies. Emerging local nature recovery strategies may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity list published under section 41 of the Natural England and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and Species of Principal Importance in England for a list of priority habitats in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making.

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitats Inventory, which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and Wider Environmental Gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to small scale development from April 2024. For nationally significant infrastructure projects, it is anticipated that the requirements for biodiversity gain will be implemented from 2025.

Biodiversity Net Gain guidance provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate Biodiversity Value with the Statutory Biodiversity Metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed firstly to consider what existing habitats within the site can be retained or enhanced. Where on- site measures are not possible,

provision off- site will need to be considered.

Where off- site delivery of biodiversity gain is proposed on a special site designed for nature (eg. an SSSI or habitats site), prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: Managing Your Land.

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species with the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool – Beta Test Version JP038 – may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural Environment – GOV.UK provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental gain.

Ancient Woodland, Ancient and Veteran Trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence – Ancient Woodlands map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient Woodland, Ancient Trees and Veteran Trees: Advice for Making Planning Decisions – GOV.UK (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland and veteran trees where they form part of an SSSI or in exceptional circumstances.

Best and Most Versatile Agricultural Land and Soils

Local planning authorities are responsible for ensuring that they have sufficient detailed Agricultural Land Classification information to apply NPPF policies (paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to Assessing Development Proposals on Agricultural Land – GOV.UK. Find open data – data.gov.uk on Agricultural Land Classification or use the information available on MAGIC.

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites provides guidance on soil protection and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim Minerals Extraction and Landfill Sites to Agriculture – GOV.UK, which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence- based advice and tools on how to design, deliver and manage green and blue infrastructure (GI), we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, green spaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well- managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long- term delivery and management plan. Relevant aspects of local

authority GI strategies should be delivered where appropriate.

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating footpaths, together with the creation of new footpaths and bridleways, should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation and promote wider green infrastructure.

Rights of Way, Access Land, Coastal Access and National Trails

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby national trails. We refer you to Find Your Perfect Trail, and Discover the Land of Myths and Legends – National Trails for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIECP) is a national trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of KCIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal Access and National Trails.

KCC Highways

Received on 11/06/2025

It is assumed that this site will remain private and therefore I have no objections to the application based on impacts to the existing highway, subject to the following conditions being attached to any permission granted;

- a minimum of eight cycle parking spaces in a secure shelter to be provided prior to first occupation and maintained for the life of the development;
- submission and approval of a Construction Management Plan prior to commencement of any development on site to include the following –
 - a) routing of construction and delivery vehicles to/ from the site
 - b) parking and turning areas for construction and delivery vehicles and site personnel, including vehicle tracking/ swept paths
 - c) timing of deliveries, avoiding network and school peaks where possible
 - d) provision of wheel washing facilities
 - e) measures to prevent the discharge of surface water onto the highway
 - f) temporary traffic management/ signage

Whilst not directly affecting the highway, the LPA should be aware of the following:

- a pedestrian route is shown to run north/ south past the units. As this is likely to be used by both pedestrians and cyclists, this should be a minimum of 3m in width
- it is unclear from the plan whether the cycle store will be fully secure (ie. not open on one side). The cycle store should be fully enclosed for security reasons
- whilst no dimensions are shown, the bin store is considered to be located too far from some of the units to meet the maximum carry distance of 30m by the resident, and should be relocated further north. Refuse collectors should not be required to travel more than 25m to reach the bin store

It is important to note that LPA 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) and it should not be assumed that this will be given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, 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 and near the highway that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by KCC while 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.

KCC has now introduced a pre- application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability.

The process applies to all development works affecting the public highway other than applications for vehicular crossings, which are covered by a separate approval process. Further details on this are available on our website.

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, 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 works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary limits and links to application forms for vehicular crossings and other highway matters are available on KCC's website.

KCC Ecological Advisory Service

Received on 12/06/2025

We have reviewed the documents provided and are satisfied that sufficient biodiversity net gain has been provided for determination. Recommended condition/ informative wording is provided in Appendix 1.

We consider a significant on- site biodiversity net gain to be proposed for this development. However, due to the location, size and type of the habitats proposed, we do not consider it proportionate to recommend the LPA to charge monitoring fees for the submission and approval or monitoring reports with regards to habitat creation on- site. However, we do consider that the habitat should be secured for 30 years, and that it is appropriate that a condition be imposed if planning permission is granted for the production of a habitat management and monitoring plan.

Developer contributions will need to be provided to mitigate for recreational pressure within the zone of influence of designated sites of international importance.

Biodiversity Net Gain (BNG)

Under the Environment Act 2021, and the Town and Country Planning Act 1990 (as amended), all planning applications for development (unless exempt), must deliver at least a 10% biodiversity net gain. Significant on- site gains, and all off- site gain, will need to be secured for at least 30 years.

Where required, the Statutory Biodiversity Metric will need to be used to demonstrate a minimum 10% biodiversity net gain prior to commencement of any development. Local policy may require a high level of net gain.

Having reviewed the submitted information, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following tables to aid the Local Planning Authority in ascertaining whether sufficient BNG information has been submitted.

Table 1 To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) .	Yes	No site visit was undertaken to assess the biodiversity baseline value. This is not best practice and we do not recommend this approach. The project ecologists claim to have taken a precautionary approach by putting the habitat as modified grassland in moderate condition. As the site would qualify for the use of the small sites metric which would have set the condition of the habitat as moderate, and given the simple habitats present on-site, we accept this approach. The biodiversity calculations were carried out in April 2025.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes	The site is 1510 square metres (0.151 hectares) in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool closely matches (0.16 ha) the reported red line boundary site area as per the application form. This small discrepancy is considered acceptable. We are content with the baseline habitat classifications and the post-development habitats are considered achievable and realistic.

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have: • a statement to the effect that these activities have been carried out; • the date immediately before these activities were carried out; • the pre-development biodiversity value of the onsite habitat on this date; • the completed metric calculation tool showing the calculations, and • any available supporting evidence of this.	Yes	None reported or visible on aerial imagery.
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).	-	None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes	

Table 2 To show a summary of our review of submitted information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)	Off-site Compensation Required (Yes/No)
10%	+12.75%	N/A	1 – all on-site	Yes	No

The total number of biodiversity habitat units (including insignificant units) proposed for delivery is 0.72.

Using the national and local guidance regarding significance, we consider that the on- site biodiversity net gain should be treated as significant and so requires securing for 30 years.

Table 3 takes elements from the national and local guidance to show how we have calculated the significance of habitats on- site. In Kent, guidance indicates that habitat delivery on- site over 0.5 units (excluding private gardens) should be considered significant on- site biodiversity net gain.

Table 3 On- site Significance of Habitats Calculator

1		2		3		4	
Retained/created habitats - medium distinctiveness or higher. (Y/N)	No. of BU.	Created habitats - low distinctiveness but making many BU relative to biodiversity value pre-development. (Y/N and pre-development total BU.)	No. of BU.	Created habitats - higher distinctiveness than pre-development or enhancements to condition proposed of retained habitats. (Y/N)	No. of BU.	Habitat creation/enhancement of low distinctiveness or higher (excluding individual trees, green walls, intertidal hard structures) is significant in area relative to size of development. (Y/N and comments)	No. of BU.
Y	0.53	N - 0.64	0.19	Y	0.53	Y - Site is 0.16ha and relevant habitat creation/enhancement is across 0.11ha (68.75% of the site)	0.51

Total biodiversity habitat units (BU) delivered by relevant creation/enhancement action (sum of columns 1 and 2): 0.72

* Significant enhancements contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development e.g.:

- o Habitats of medium or higher distinctiveness in the biodiversity metric;
- o Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- o Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- o Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- o Enhancements to habitat condition.

** In Kent, guidance indicates that the delivery of above 0.5 biodiversity units is considered the threshold for on-site significance.

*** Private gardens and container planting are not considered significant enhancements and have not been included in the above table.

North Kent Sites

The development includes proposals for new dwellings within the zone of influence (ZoI) (6km) of the Thames Estuary and Marshes Special Protection Area and its associated Wetland of International Importance under the Ramsar Convention (Ramsar site),

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the National Planning Policy Framework (2024).

Gravesham Borough Council will need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS). This is to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full appropriate assessment is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS, there is still a need for an appropriate assessment to be carried out as part of this application.

The Local Planning Authority (the "Competent Authority") must consult with and take into consideration Natural England's advice in determining the application. The Local Planning Authority also needs to be confident that proposals will not adversely affect these sites in line with the NPPF.

The responsibility for carrying out a Habitats Regulations Assessment Screening and Appropriate Assessment lies with the Competent Authority, Gravesham Borough Council.

Southern Water

Received on 18/06/202

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance.

No soakaways shall be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS guidance.

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers, the applicant will need to ensure that arrangements exist for the long- term maintenance of the SUDs facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should;

- specify the responsibilities of each party for the implementation of the SuDS scheme
- specify a timetable for implementation
- provide a management and maintenance plan for the lifetime of the development

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The initial assessment does not prejudice any future assessment or commit to any adoption agreements under section 104 of the Waste Industry Act 1991.

Proposed Soakaways

The Council's Building Control Officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development. No new soakaways should be located within five metres of a public or adoptable gravity sewer, rising main or water main.

Connection to Public Sewer

Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or the developer.

We request that should this planning application receive planning approval, the following informative is attached to the consent. Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water.

GBC Housing

Agree that tenancy can be limited to 18months.

GBC Environmental Protection

The noise impact assessment submitted with the application has been reviewed. The methodology and findings are accepted. The report concludes that noise from the ASHP associated with the proposed dwellings will not be a problem to nearby houses. It has however been recommended that the ASHP are programmed to operate on the night mode between 23.00 and 07.00 to further reduce noise (this setting reduces noise levels by 5dB). A condition should be attached to any permission requiring the operation of the ASHP to be in accordance with the submitted details.

It was advised in the pre-application consultation response that a Noise Management Plan should be submitted. This should detail how noise will be addressed and how any noise complaints will be managed, if there is to be any on site supervision etc. I can't see that an NMP has been submitted so it is advised that a condition is attached requiring this to be submitted for approval prior to the dwellings being occupied.

Due to the proximity of the existing dwellings a Code of Practice on Construction condition is also

recommended.

GBC Waste Management

I have reviewed the planning application and the information on refuse collection storage is limited. Please can I have answers to the below questions.

- Type, size and number of bins which are shown in the plans
- Confirmation that provision has been made for residual, recycling and food waste collections
- Whether a dropped kerb will be installed to aid the emptying of the bins

Gravesham Borough Council operates a fortnightly collection of refuse and recycling and a weekly collection of food waste.

Developers are required to pay for the provision of all bins required for a development, quotes for bins can be obtained by emailing waste.management@gravesham.gov.uk.

Collections from sites will not occur until containers are in place.

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.***

The Council should be informed at least two weeks prior to the waste collections by the council commencing so that collections can be scheduled.

No comments from;

- Environment Agency
- Southern Gas Networks

Neighbouring properties

31 surrounding properties were consulted and the site was advertised by means of a site notice. Ten responses have been received, two making representations, and eight objecting to the proposed development.

Representations;

- the idea of helping the homeless move back into society is a good one;
- there are concerns over the proposed tree planting and tall trees should be planted;
- tree roots may affect the nearby buildings' foundations and underground utilities – it may be better not to plant trees near 64 and its neighbour;
- the site has been underused for a long time; it would have been used more had the grass been cut;
- construction traffic during the development may cause issues as there is almost no off- road parking in St Albans Close;
- what steps may be taken to ensure that residents' and emergency vehicles are not delayed during construction works?;
- how would construction vehicles access the site and where would they park?;
- how would the modules be delivered to the site? What would be the timescale for this;
- could a small children's play area and wildflower bed be provided?.

Objecting;

- loss of community green space and the small area of nature available to the local residents. The claim that only 15% of the space will be taken up is misleading. The proposal runs counter to the state's policy of protecting green nature;
- the land is used by the local residents: they would not feel safe continuing to do so with the

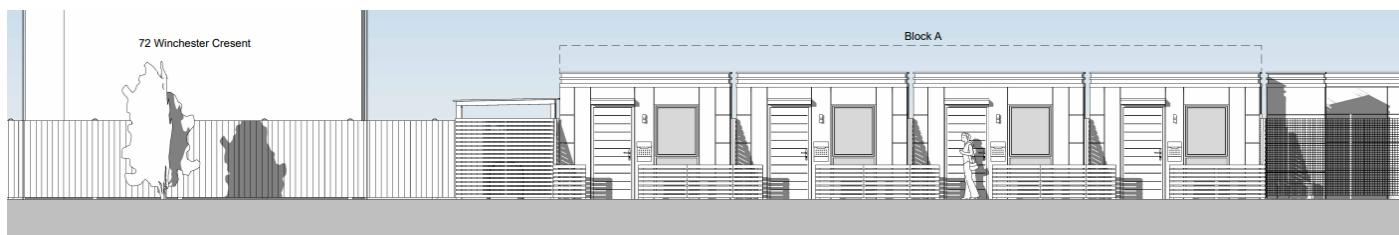
development in place;

- the proposal is out of keeping with the surrounding residential properties;
- the site is too small and the development would be cramped on the site. Eight pods are excessive for the size of the site. It would create an overdeveloped and congested feel in what is a valued open area;
- concern is raised over the background of the proposed residents;
- potential safety and well-being issues. The development would cause discontent amongst existing residents;
- the community should not be expected to bear the risk or manage issues that may arise from the development;
- parking and congestion issues would arise as the estate already struggles with parking congestion;
- negative impact upon property value;
- the short-term nature the proposed tenancies for the units will prevent meaningful integration and may contribute to community instability;
- the proposed location of the bin store is too close to the existing homes and would cause adverse smell issues;
- an increase in local crime would result;
- the best place to accommodate such people is in hotels;
- no time limit for the proposal is stated and the units could become a permanent eyesore;
- the proposal may result in an increase in fly tipping in the area;
- regular checks on the residents would not be undertaken;
- there has been a lack of community consultation on the proposal;
- the Council is urged to reconsider the siting of the proposal.

Officer's Analysis



Proposed block plan of the application site



Front elevation of Block A (adjacent to 72 Winchester Crescent)

Introduction

This application has been submitted as part of Gravesham Council Investment Partnership with the Hill Partnership in providing homes to help alleviate homelessness across the United Kingdom. Eight modular homes ('pods') have been donated and would be installed by the Hill Partnership. They would be managed by the Council's Homelessness and Rough Sleeping Team. It is expected that the development may commence within a few weeks of the grant of permission and would take about ten weeks to complete.

The self-contained modular homes would be single storey, forming a terrace extending the houses at 64-66 St Albans Close and backing on to the boundary line with 66 St Albans Crescent and 72 Winchester Crescent. A small, paved area enclosed by a timber fence would be provided in front of each of the homes to provide private outdoor space. Hard and soft landscaping would be incorporated in the development. The modular homes would be 3.1m high and would have an internal floor area of 24sqm. They would have communal air source heat pumps (one per block of four pods) and would be finished with powder coated aluminium and cementitious colour cladding (black and blue). The pods would provide high quality transitional/ short term accommodation for people who require low- level support in maintaining their tenancy before transitioning into an Assured Shorthold Tenancy in the private sector or social housing. The documentation states that it is expected that the residents of the pods would be in the accommodation for between six months and two years as this is the projected length of time that the individuals transitioning from supported accommodation to private sector or social housing would need to make the transition. This is stated to be consistent with other supported and temporary accommodation across the borough, managed by the Rough Sleeping Team. The pods would be equipped with essential amenities while encouraging occupants to take on additional responsibility gradually, such as managing electricity and water bills and paying their rent.

A Mechanically Ventilated Heat Recovery System (MVHR) would be provided for the pods. As they would be mechanically ventilated, further passive ventilation should not be required.

Cycle parking would be provided in the form of five Sheffield Stands sited to the north of the northernmost unit (providing parking for ten bicycles in total). Waste storage would be provided in two bin stores – one at either end of the site. Car parking would not be provided in the development.

It is understood that the pods would provide transitional/ short term accommodation for people who require low- level support in maintaining their tenancy before transitioning into an Assured Shorthold Tenancy in the private sector or social housing. The pods would seek to bridge the gap between homelessness and independent living. It is expected that most of the pods would be used by former rough sleepers though some will accommodate individuals from the Council's 24/ 7 supported living accommodation when their support is no longer high, and others could be single homeless households with a moderate to low support need. The pods would provide a secure, clean and private space for a single person ensuring they have access to necessities such as shelter, sanitation and personal safety. They would provide stability and a foundation for the individuals to focus on their personal development and growth.

The site comprises approximately 1510 sqm of land forming part of the public open space at St Albans Close, in Gravesend. It is bound to the east by the rear gardens of 66 St Albans Close and 72 Winchester Crescent and to the west by a concrete footpath running across the open space from north to south. To the south, the site fronts St Albans Close while to the north is a public footpath that runs alongside Winchester Crescent. There are two footpaths, one running north – south through the open space and one running east

– west along the southern boundary of the site.



The Gravesham Borough Council Open Space Assessment Report (2016) identifies the open space as St Albans Close under ID 152 – Amenity Greenspace. It is for informal recreation, though the agent for the application understands it to be primarily used for dog walking and as a pedestrian cut through route. Case Officer observation at the time of his site visit showed dog walkers and people relaxing on the grass to be present. The Open Space Assessment Report considers the site to have a low- quality score of 40.9% (anything below 45% is regarded as low- quality) and a value score of 20% (the threshold for high value space is 20%).

The site is located close to a local parade of shops (within 5 minutes' walk of the site) with further shops and surgeries within 15 minutes' walk. There are bus stops along nearby Valley Drive, within a few minutes' walk of the site. The site is in Flood Zone 1 and is therefore at low risk of flooding. It is not at risk of surface water flooding.

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath re- emphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states the starting point for decision- making is the development plan. Lord Carnwath, as part of the Supreme Court decision, stated,

“It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan- making in which it has a statutory recognition), it is no more than “guidance” and as such, a “material consideration” for the purposes of section 70(2) of the 1990 Act. It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme”.

It is a matter of law that all planning applications need to be considered in accordance with the legislation

and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023 which demonstrates that based on data up to the period 2022- 2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council's current inability to demonstrate a five year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014), Policy CS02 must be regarded as being out of date, as required by paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless:

- i. the application of 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.

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

- Habitats sites (and those listed in NPPF paragraph 189)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- National Landscape
- Irreplaceable habitats
- Designated heritage assets (and other heritage assets of archaeological interest, see NPPF footnote 75)
- Areas at risk of flooding or coastal change

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 130(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development for an increase of eight (albeit specialised) residential units would offer a modest contribution towards meeting this local need and, accordingly, officers consider this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the development plan and the NPPF (2024) which require new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and to create a high standard of amenity for existing and future occupiers.

Principle of Development/ Loss of Open Space

The application site is located within the Urban Boundary of Gravesend where new dwellings are acceptable in principle in accordance with Policy CS02 of the Core Strategy: Scale and Distribution of Development. The site is within an existing residential estate and is surrounded by one and a half and two storey dwellings. It is a sustainable location and has good access to local services and facilities and public transport. The weight in support of the development for the provision of housing of must be balanced against the loss of open space. In terms of open space, central Government guidance states;

“Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework [paragraph 96](#)). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits

to people living and working nearby; have an ecological value and contribute to [green infrastructure](#) (see National Planning Policy Framework [paragraph 171](#)), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework [paragraphs 7-9](#)).

“It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the [duty to cooperate](#) where open space serves a wider area. See [guidance on Local Green Space designation](#), which may form part of the overall open space network within an area”.

Local and national planning policy provide a strong basis for the retention of the site for open space. Policy CS13 of the Council’s Core Strategy states *“The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities”*. Policy CS19 of the Core Strategy requires *“New development will... ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure”*.

The NPPF (2024) seeks to protect existing open space, sport and recreational land and buildings and ensure that developments include greenspace. Paragraph 104 of the document states;

“Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless;

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;*
- 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 outweigh the loss of the current or former use”.*





The St Albans Close Open Space

The proposed pods would be sited adjacent to the fence visible in the bottom photograph.

The site was included in the April 2016 Open Space Assessment and Playing Pitch Assessment by Knight, Kavanagh and Page. In its recommendations, the study stated that it is important for all open space to be protected as a starting point. The study identified the site as amenity open space, but having a low- quality score of 40.9% and a high value score of 20% and as such, it considered it as a key form of open space which it was important for the Council to maintain if possible. The document identifies a high- quality scoring site as;

“High scoring sites, such as the ones above, reflect the range of ancillary facilities available as well as the good standard of appearance and maintenance. They also tend to have plenty of ancillary facilities such as bins and signage and in some cases, parking and play provision. Features such as these contribute to their overall quality and help to create more opportunities and reasons for people to access provision”.

A high value site is described as follows;

“These sites are recognised for the level of accessible recreational opportunities they offer to an excellent standard of quality intended for a wide range of users”.

It is important to clearly identify that the application site occupies only a portion of the total open space. A large portion of the open space will remain. The application site is circa 300 sqm; which is less than half the total area in the St Albans Close open space. Case Officer observations showed the space to be used for dog walking and relaxation. The Planning Statement submitted with the application states the site is surplus to requirements because of the quantity of provision in the area. The open space is classified in the Open Space Assessment Report as an Amenity Greenspace. The Gravesham Open Space

Standards Report (2016) suggests a quantity benchmark for open spaces of this type is 0.6 ha per 1000 population, as per the Fields In Trust's Beyond the Six Acre Standard Report (2015). The Borough of Gravesham as a whole has open space provision of 0.92 ha per 1000 population, within the urban areas of the borough. The open space provision within the borough therefore exceeds the Open Space Standards Report standards by 23%.

The submitted Planning Statement highlights that the amount of open space that would be lost is very small and given the overall level of open space provision within the borough (96.92 ha), the loss would be negligible. Moreover, there are six areas of amenity greenspace provision within a 400m (5 minute) walk of the site. Three of these spaces are considerably larger than the St Albans Close open space.

Site ID	Site Name	Quality Score	Value Score
155	St Dunstons Drive Open Space	24.9%	16.8%
158	St Gregorys Recreation Ground	66.7%	50.5%
166	St Patricks Gardens	42.9%	36.8%
187	Truro Road Open Space	39.6%	15.8%
204	Whitehill Road Open Space	53.9%	37.9%
220	Whitehill Lane	45.2%	10.5%

Of the six spaces, as the table above shows, they mainly have higher quality and value scores than the St Albans Close open space (40.9% and 20% respectively). The St Patricks Gardens open space has been renovated since the publication of the Open Spaces Assessment and Standards Report (2016) and given the overall provision of nearby open space, it is not considered that there is a lack of it in the vicinity of the application site.

Given that the proposed development would utilise less than 50% of the total St Albans Close open space site, it is considered that the proposed loss of 300 sqm of the site would, on balance, be acceptable. The depth and width of the remaining open space would be of a usable size and would not be too small or awkwardly- shaped for those wishing to use it. Together with the other amenity greenspaces within a 400m (5 minutes) walk of the site, it is considered that the loss of the greenspace that would arise from this application would be acceptable. The benefits that would arise from the proposed development in terms of housing eight homeless individuals with the aim of integrating them back into society, are furthermore considered to be sufficient to outweigh the harm that would arise from the loss of the amenity space. Given that homelessness is an on- going issue, all efforts and practices to reduce and eliminate it are considered necessary and worthwhile. The loss of part of a small area of open land to the particular cause is therefore considered acceptable.

In addition, the proposal would result in the sympathetic planting and the restoration of the existing grass surface of the open space to ensure that the site integrates well with the current layout of the area.

The agent for the application has not provided any evidence of other sites for the development having been considered or whether any alternative layouts for the site have been considered. There is also no explanation whether the proposed loss of open space can be mitigated. However, the arguments that the loss of the open space is limited and the presence of the six other open spaces within 400m of the site, and the above- mentioned benefits, are considered sufficient to justify the loss of the open space.

Policy CS13 of the Core Strategy states *"The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities"*, and Policy CS19 states *"New development will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure"*.

While the development would not enhance the quantity or accessibility of St Albans Close green space, it would provide benefits to society which would outweigh this.

Density of Development

Policy CS15 of the Core Strategy requires all new housing be developed at a density which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is located. Subject to this overriding consideration, new residential development within the urban area will be expected to achieve a minimum density of 40 dwellings per hectare (dph). The density of the development would be 53 dph which exceeds the minimum density but is not considered to be too high a density. It is not considered that the character of the area would be compromised by the development, in compliance with Policy CS15.

Affordable Housing

The proposed development falls below the threshold at which Policy CS16 of the Core Strategy requires the provision of affordable housing. Notwithstanding this, the development is to provide temporary accommodation for homeless individuals. Therefore, whilst affordable housing is not a requirement for the development, the intent to provide homeless housing is considered to be positive as it will help meet the Borough's housing need and provide housing for a particular element of the population.

Design, Character and Appearance

Policy CS19 of the Core Strategy states the design, layout and form of new sustainable development will 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 the character of the area. The Council's design code Supplementary Planning Document, *Design for Gravesham*, expands on this. The NPPF (2024) sets out that the creation of high- quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Considering the site's openness and clear visibility from a number of public and private viewpoints, and the extent of the proposed development, it would have quite a significant impact upon the character and appearance of the area. However, the proposed pods would be single storey only and would be set in close proximity to the boundaries of 72 Winchester Crescent and 66 St Albans Close, continuing the line of dwellings from 4 to 66 St Albans Close;



The pods would inevitably be visible from a reasonable distance to the north along Winchester Crescent and to a lesser degree from the south along St Albans Close (the proposed pods in Block B – the southern-most of the two blocks – would project forward of the dwelling at 66 St Albans Close). However, they would only be 2.8m high with flat roofs and would each be provided with a small front garden behind a low fence, with tree planting in front of the plots. While the pods' dark appearance (black and blue) would be in contrast to the mix of white render and light brown and red brick of the surrounding dwellings, their limited

extent is such that their visual impact would be limited. The dark, flank elevations of the northern- most pod and of the southern- most pods would be visible from a reasonable distance from the north and south respectively. The applicant has confirmed that changing the colour of the external flank walls of the pods is not feasible as they are of a modular, prefabricated design and therefore cannot reasonably be altered. It is considered that with a satisfactory soft landscaping plan, the visual impact of the units can be satisfactorily mitigated.

It is not considered they would appear cramped on the plot, or appear as an overdevelopment of the site, given their reasonably limited size and the space that would remain around them. Together with some planting in the area to the front of the pods and their front gardens (which may be achieved by condition), it is considered that the development would have an acceptable impact upon the overall character and appearance of the area. The size of the proposed pods together with the softening effects of the landscaping are such that the development would have an acceptable visual impact.

While no time limit for the proposal has been included with the application, it is understood that the proposed initiative is on- going between Gravesham Council Investment Partnership with the Hill Partnership in providing homes to help alleviate homelessness across the United Kingdom. The pods are designed to last for 60 years. There is no reason to suspect that the proposed pods would be abandoned or become an eyesore and therefore harm amenity. Nonetheless, a condition will be attached ensuring the removal of the homes if they cease to become occupied.

Amenity of Future Occupiers

The NPPF (2024) states planning decisions should aim to secure a high standard of amenity for all existing and future users. Policy CS19 of the Core Strategy states new development should be located, designed and constructed to safeguard the amenity, privacy, daylight and sunlight of its occupants, and those of neighbouring land buildings. The policy is supported by the guidance in the Design Guide Supplementary Planning Document.

The proposed pods are to be let to individuals, rather than families. They would each have an internal floor area of 24sqm. While this is less than the minimum recommended 37sqm for a one- bedroom dwelling (in the Technical Housing Nationally Described Space Standards 2015), the fact that they are to be for individuals in a comparatively short term basis, it is considered they would provide a suitably sized unit with a satisfactory level of amenity for their occupiers. The information provided with the application stated occupancy would be between 6 months and two years. Given the modest sized of the units, there is a concern regarding their length of occupation. Having undertaken research of other similar developments around the country, a maximum of 18 month appears to be more acceptable. A discussion was had with Housing and the Agent, and shorter 18month tenancy length was agreed.

Given the short term length of stay, the units would not, on balance, result in an adversely cramped internal living environment. With high ceiling heights and large windows (though only in the front and rear elevations), they would provide a sufficient level of internal lighting for their future occupiers. The units will only be inhabited by an individual and they would provide satisfactory accommodation subject to a management plan detailing how they would be managed. This may be achieved by condition.

The lack of significant individual amenity space for the units is not considered to be an issue given the site is part of an open space site and the future residents of the site would have direct access to the space (and the other nearby open spaces), alongside the temporary nature of the accommodation.

Neighbouring Amenity

The proposed pods would be 2.8m high with flat roofs and would be a little over one metre from the flank boundaries with 66 St Albans Close and 72 Winchester Close. The boundaries of the application site with these properties comprise a 1.8m/ 2m high close boarded fence. The pods would therefore project above the fence by up to one metre. In the case of Block B (adjacent to 66 St Albans Close), this is not considered to be an adverse issue as the adjoining boundary of 66 is splayed away from the dwelling at 66. While there are ground and first floor windows in the flank elevation of the dwelling at 66 facing the application site, as the pods would be single storey only, they would not have a harmful impact upon the outlook of the

occupiers of the dwelling. While the proposed dwellings would be visible from the rear garden of 66, they would not be visually intrusive from here due to their limited size.



The proposed pods would be sited to the fence in this photograph. 72 Winchester Crescent is on the left, and 66 St Albans Close is the white rendered dwelling to the right.

The pods in Block A would have a greater visual impact for 72 Winchester Court as they would be visible from the windows in the rear elevation of this dwelling (and from its rear garden). However, as they would be sited more than one metre from this boundary fence and would project above it by around one metre, it is considered that the proposed visual impact would be acceptable. The impact of the pods on the amenity of the other neighbouring and surrounding dwellings would be acceptable, due to the distances involved.

Considering the height of the boundary fence of 72 Winchester Crescent and 66 St Albans Close and the finished floor level of the pods, it is considered appropriate to obscure glaze the rear-facing pod windows in order to prevent the possibility of overlooking of those dwellings (given that the finished floor level of the pods would be 250mm above ground level). These windows would be top hung and, finished in obscured glass, would not permit overlooking of the boundary fences of the neighbouring properties. It is not considered that requiring these windows to be obscure glazed would have a harmful impact upon the amenities of their future occupiers, or result in a loss of outlook as the outlook from the rear of the pods would only be onto boundary fences at a distance of around one metre.

It is not considered that the proposed pods would result in undue noise and disturbance for either each other or the nearby and surrounding residential properties given their nature and limited levels of occupation. Nonetheless, a noise management plan will be conditioned to further safeguard neighbour amenity.

The Council's Environmental Protection Team is satisfied that the proposed air source heat pumps for the development would not have an adverse impact upon the amenities of the neighbouring properties, subject to their being programmed to operate on night mode between 23.00 and 07.00 each day as this would reduce the noise levels arising from them by 5dB. A condition may be imposed upon the permission that the pumps be used in accordance with the submitted details.

The proposed bin stores would be around 5m from the dwelling at 64 St Albans Close and around 4m from the dwelling at 72 Winchester Close. Over this distance and providing the bins are emptied in a regular basis, it is not considered that the bins would result in unpleasant smells for the occupiers of that dwelling. A condition requiring the submission of details of a refuse collection strategy for the site may be imposed upon any permission granted.

The proposed development would therefore comply with the relevant guidance in the NPPF, Policy CS19 of the Core Strategy and the Design Guide SPD.

Parking and Highways

Considering the proposed development would provide temporary accommodation for homeless people, it is

considered highly unlikely that it would generate a parking demand. It is nevertheless considered that the management plan for the site should ensure that the future occupiers of the site do not have cars.

The development would include Sheffield Stands for cycle parking which is considered to be a positive element of the proposal. The stands may be made secure in accordance with the Secured By Design guidance from Kent's Designing Out Crime Team. This may be conditioned.

The submitted plans indicate that only five Sheffield Stands would be provided in the development. This would provide parking for 10 bicycles, sufficient for one space per pod.

Kent County Council Highways have advised that as the pedestrian route running past the units is likely to be used by both pedestrians and cyclists, it should be 3m in width. However, the agents for the application have stated that path is not proposed to be a shared pedestrian/ cyclist route as its use by cyclists would likely result in noise disturbance for the occupiers of Block A and furthermore the path does not connect to a shared use path at its northern end. It connects to the footpath at Winchester Crescent which is not designed for bicycle traffic as it is only around 1.5m in width and features stairs at its connections to the roadway of Winchester Crescent. The nearest step free connection to this footway is around 120m away.

The use of the proposed path for pedestrian only is entirely appropriate therefore and the width of 1.2m is consistent with the Kent Design Guide, Section 2, Step 3 (Designing for Movement), where a minimum footway width of 1.2m is identified. The agent of the application have also stated that the provision of a wider footpath would also reduce the value of the open space for recreation and its ecological value. The provision of a 1.2m wide footpath is therefore considered to be acceptable in this instance.

Biodiversity

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The application has been supported by a BNG metric and accompanying report demonstrates that the total number of biodiversity habitat units proposed is 0.72. KCC Ecology have reviewed the BNG documents and are satisfied that these gains are achievable, providing these habitat creation creation/enhancement measures are securable and should be done for 30 years

If planning permission is granted, the applicant should submit a biodiversity gain plan in accordance with the Biodiversity Net Gain Assessment (Ref: 17906_R01_JW) dated 14th April 2025 and prepared by Tyler Grangeform. A Habitat Management and Monitoring Plan is also required.

Ecology

The application site is within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/ or vulnerable in a European context, and also sites that form a critically important network for birds on

migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over- winter or breed on the SPA and the Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £337.49 per dwelling). This approach is approved by Natural England for all new residential developments.

For every planning application for a new dwelling (including flats and HMOs) which does not require any other contributions to be secured through a s106 legal agreement or unilateral undertaking, the tariff has been secured through a contribution agreement.

The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However, a more recent European Union Court of Justice (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between “the plan or project” itself and “measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

In this case, a contribution agreement would be required and a SAMMS fee of £2,699.92 is required, which has been made. With this payment made, the Local Planning Authority is satisfied that the proposal would put in place adequate measures to mitigate potential significant adverse effects on the Thames Estuary and Marshes SPA/ Ramsar site.

Any Other Material Planning Considerations

Drainage

Policy CS18 of the Core Strategy states the Council will seek to minimise the impact of drainage from new development on waste water systems, including through the use of sustainable drainage systems. The NPPF also promotes the uses of sustainable drainage in new developments.

Southern Water have stated a condition requiring the submission of foul sewerage and surface water drainage be imposed upon any permission granted, in order that the proposed development does not have an adverse impact in terms of drainage and flooding. However this information has been provided with the application, and a condition requiring compliance will be attached.

Safety

Concern has been raised from third parties regarding the safety of the future occupiers of the pods and the occupiers of the surrounding properties. The Planning Statement submitted with the application does not cover the issue of safety in detail but states the future occupiers of the pods would be provided with support from the Council's Homelessness and Rough Sleeping Team and other well- trained professionals (support workers) who would phone and/ or regularly visit the accommodation to ensure the residents needs are supported. They would provide between two and six hours support per week. A tenant management plan will be condition in order to secure the safeguarding of surrounding residents.

Waste and Refuse

The originally submitted land indicated the bin store would be located too far from the northern- most of the proposed pods such that it would be exceed the maximum refuse carrying distance for residents of 30m. However, amended plans have been received, indicating two bin stores would be provided on the site – at the southern and northern ends of the site – meeting this concern. The maximum refuse carrying distances for both the residents and the waste operatives would not be exceeded.

It is considered necessary to require a refuse collection strategy be submitted to and approved in writing by the Local Planning Authority in order that issues of waste remaining on site and causing issues of smell and visual intrusion do not arise. This may be achieved by condition.

Archaeology

Policy CS20 of the Core Strategy states the Council will accord a high priority towards the preservation, protection and enhancement of its historic environment. The NPPF provides a similar level of protection to historic assets.

The application site comprises an area of undeveloped land in an area of archaeological potential. However, Kent County Council's Heritage Officer considers the development would be unlikely to have a significant below ground archaeological impact. No conditions are suggested.

Other Issues

The comments and objections received about the application are noted. While there is likely to be a degree of noise and disruption during the delivering of the pods to the site/ the erection of the development, the negative impact upon residents will be minimal. The routing, access and siting of construction vehicles may be controlled by a CEMP condition. This may include how the pods would be delivered to the site and would limit the congestion issues that may be caused during the construction of the development.

While the provision of a children's play area and a wildflower bed may be beneficial, it is not considered that these could be reasonably asked of the developer. The comments regarding tree roots potentially damaging the nearby dwellings and utilities are noted. However, in the event of permission for the proposal being granted, a condition for a landscaping scheme may be imposed, in which details of the species of trees may be controlled. The extent of root spread may also therefore be limited in this manner as only trees with restricted root spread may be permitted.

There would not be a requirement for the community to bear the risk or manage issues that may arise from the development. The use of a management plan for the development would remove this need.

The effect of a development upon property values is not a planning issue.

Whether the future occupiers of the pods would be able to successfully integrate into the local community as a result of their short tenancies is not known. There is also no reason to consider the development would result in an increase in local crime or fly tipping. Accommodating the proposed occupants of the pods in hotels would not achieve the aim of assisting them back to living on their own.

Conclusion

The proposed development would be of significant benefit in providing eight homes to help alleviate homelessness in the borough. Though they would result in the loss of around 300 sqm of the St Albans Close open space, the remaining open space would be of a size and shape which would provide a high level of amenity for the local residents. Moreover, the presence of a further six areas of open space within a 5 minute walk of the application site is such that the limited loss of open space that would arise from this development is, on balance, considered acceptable. Due to their limited size and proposed landscaping, the pods would not have an adverse impact upon the character and appearance of the area.

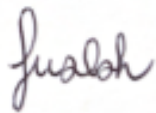
The proposed development would provide suitable living accommodation for its future occupiers, without having an adverse impact upon the amenities of the neighbouring and surrounding occupiers. The development would not have adverse parking or highway safety issues as the future residents would not have cars. The provision of Sheffield Stands for cycle parking would encourage the use of cycling as a

means of transport.

Recommendation

The recommendation for this application is that it be approved.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Tom Gabriel	Team Leader:	Mrs Faye Walsh
Signed:	Tom Gabriel	Signed:	
Dated:	9 th September 2025	Dated:	16 October 2025