

PLANNING REPORT

Site Name : 22a Kitchener Avenue,

Site Location : Gravesend, DA12 5HY.

Combined Planning and Design & Access Statement in support of a Planning Application to erect 2 no. 2 bedroom semi-detached dwellings.



On behalf of

Mrs Joyce Ayen.

December 2024.

Job Number C/0389/1

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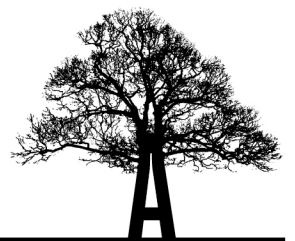
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1.Introduction

1.1. Background.

1.1.1. This statement, which comprises both a Planning Statement and a Design & Access Statement, has been prepared in support of a Planning Application to erect 2 no. 2 bedroom semi-detached dwellings.

1.2. The Site and its surroundings.

1.2.1. The application site is a 0.04 ha plot forming an external yard to the rear of an existing pharmacy at 22a Kitchener Avenue, a parade of commercial premises which all back on to School Road, a single track road that provides service access to 18-22a Kitchener Avenue, a builders yard to the rear of flats at 24 -28 Kitchener Avenue and Whitehill Primary School and Nursery. The site is set behind a high concrete block wall built up tight to the site boundary.



Images 1 – south looking views onto site as existing.

1.2.2. Image 2 below shows an approximate site boundary on an aerial photograph base. The site location plan included as Plan 1 shows the extent and location of the proposal/application site edged in red.



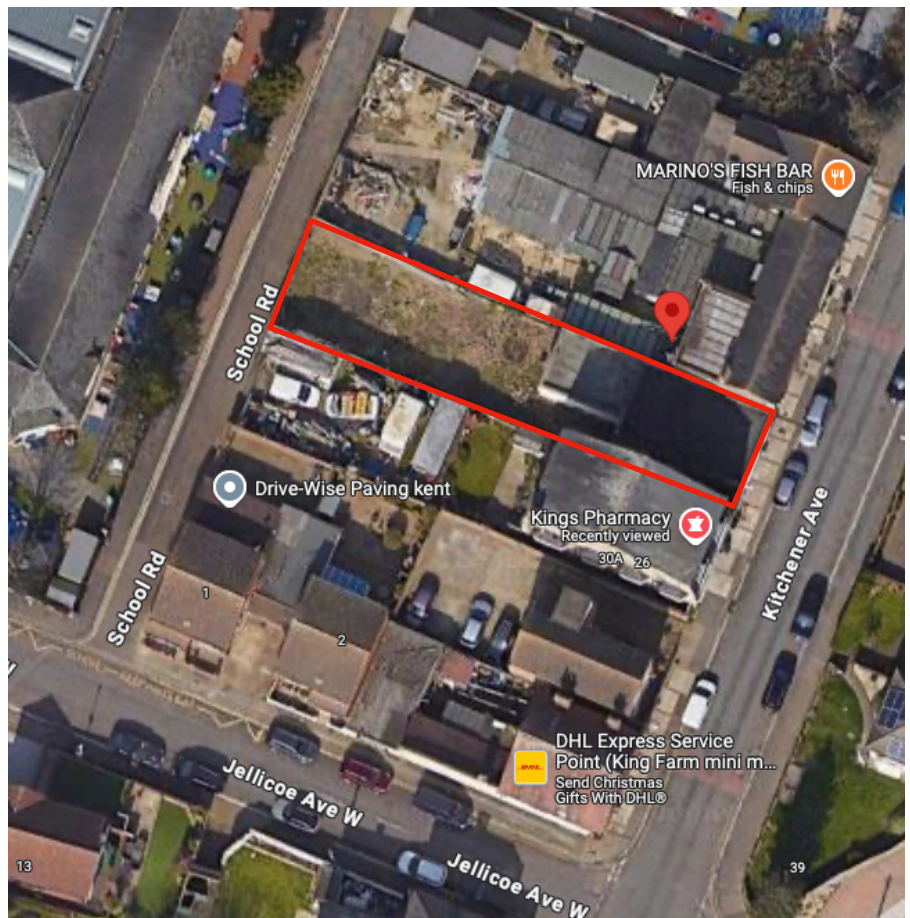
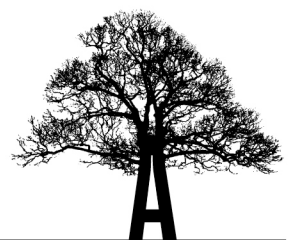


Image 2 – Aerial view of the application site.

1.3. Description of the Development.

- 1.3.1. The applicant seeks to redevelop the site to provide 2 modestly sized 2 storey 2 bedroom semi detached dwellings. The development and the design concept are further described in Section 4, “Design and Access”, of this statement.



1.4. Planning History.

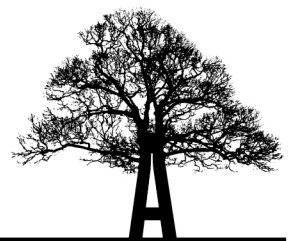
- 1.4.1. There is no relevant site specific planning history pertaining to this application.
- 1.4.2. In February 2021 an appeal against the refusal of a planning application (ref 20191097) was allowed on neighbouring land to this application site at 20 Kitchener Avenue (Appeal Ref W/ 4001327, decision letter attached as Appendix 1 to this report) for the partial demolition of rear single storey shop extension of 20 Kitchener Avenue and re-development of land to the rear of 20, 20a and 22 Kitchener Avenue fronting onto School Road to create 2 two bedroom two storey homes with associated landscaping and parking. I will reference Inspector Tivey's decision letter throughout this report.



2.Case in Support of the Application.

2.1. Introduction.

2.1.1. This statement will go on to demonstrate that the proposal is compliant with existing National & Local policies and as such, there is a robust case for considering this application as fully compliant in policy terms. It will also demonstrate that there are no unacceptable adverse effects on interests of acknowledged importance resulting from the proposal.



3.Planning Policy.

3.1. Planning Framework.

- 3.1.1. The following sections will provide an analysis of key policy issues that impact on this proposal.
- 3.1.2. For the purposes of this application, the relevant development plan is the National Planning Policy Framework (“NPPF”, “The Framework”) December 2024 and the adopted Gravesham Local Plan Core Strategy (“GLPCS”) 2014. The GLPCS predates the most recent iterations of the Framework (of 2018, 2019, 2021 and twice in 2023).

3.2. National Planning Guidance and Local Policy.

- 3.2.1. The proposal site is shown without designation on the policies map to the **GLPCS**.
- 3.2.2. Delivering a sufficient supply of homes.
- 3.2.3. **Framework** Para 73 provides that: *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should (inter alia):*
- d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; ...”*
- 3.2.4. **GLPCS** Policy CS02: “Scale and Distribution of Development” provides (inter alia) that:
- “The strategy prioritises development in the urban area as a sustainable location for development. This will be achieved by:*
- *Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area.*
 - *Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development.”*



3.2.5. **GLPCS** Policy CS14 “Housing Type and size” provides (inter alia) that:

“The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.”

3.2.6. Issues relating to the determination of this application.

3.2.7. **NPPF** December 2024 makes it clear that proposals for development on brownfield land such as the application site should be approved unless substantial harm would be caused. This is considered to weigh heavily in the planning balance in favour of positive consideration of this application.

3.2.8. The proposal is considered to represent an efficient use of the site, in term of providing a windfall housing opportunity which will contribute towards meeting housing targets within the existing urban area.

3.2.9. The Strategic Housing Market Assessment (SHMA) that underpins the **GLPCS** indicates that there is a need for a mix of house sizes for both market and affordable housing. For market housing, it shows a significant need for three bedroom (47%) and two bedroom (31%) properties. The application proposal therefore makes a modest contribution to meeting the acknowledged shortfall in 2 bedroom market housing provision.

3.2.10. The fact that the proposal is in principle in accordance with all the above policies weigh heavily in favour of development and should be considered positively as part of the overall assessment of the planning balance.



3.2.11. Maintaining supply and delivery.

3.2.12. **Framework** Para 78 provides that:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies.”

3.2.13. Para. 11 (d) of the **Framework** is therefore highly relevant, in stating (inter alia):

“Plans and decisions should apply a presumption in favour of sustainable development. ... For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply), granting permission unless:

the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

3.2.14. Issues relating to the determination of this application.

3.2.15. As of March 2023 the Gravesham Council area does not have a deliverable 5 year housing land supply, with a published housing land supply figure at 2.9 years. As such, given the acknowledged housing supply shortfall in the Gravesham Council Area, the so called “tilted” balance is triggered in respect of the application hereby submitted. In the event of a finely balanced decision the “tilted” balance attracts significant material weight in favour of allowing this application.



3.2.16. Achieving Well-designed Places.

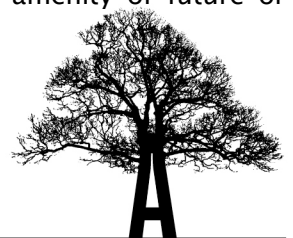
3.2.17. **Framework** Para 135 provides:

“Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

3.2.18. Issues relating to the determination of this application.

3.2.19. The current proposal has been designed, as further described in Section 4, “Design and Access”, of this statement, to be of an appropriate scale, massing, and design to ensure assimilation into the sites existing context in the surrounding townscape, with reference to the requirements of GLPCS Policy CS19 “Development and Design Principles”. As a result, there is not anticipated to be any unacceptable impact on the the character, appearance and context of the surrounding area, no unacceptable loss of landscaping, natural habitats, or play space or amenity space and no unacceptable impact on the residential amenity of future or existing occupiers.



4.Design & Access.

4.1. Background.

- 4.1.1. The purpose of a Design and Access Statement is to communicate the design process and considerations that have informed this scheme, and also how the design considers the accessibility of the site.

4.2. Context.

4.2.1. Existing buildings/structures on and surrounding the Site.

- 4.2.2. The proposed development is the erection of 2 no. two storey 2 bedroom semi detached dwellings.

- 4.2.3. The wider curtilage of the proposal site amounts to some 0.04 ha in area.

- 4.2.4. The proposal site sits well within the built up area of this part of Gravesend in an existing predominantly residential area. The Inspector to the February 2019 appeal decision characterised the surrounding area thus:

“The rear boundaries of the Kitchener Avenue premises tend to be utilitarian...in their appearance, and provide a soulless elevation to those using School road and the footway that runs along its western side. A pair of linked detached two storey dwellings have been built in recent times at 2 and 4 Jellicoe Avenue West at the junction of School Road, the flank elevation and rear garden side boundary for the latter also being contiguous with the eastern boundary of the adjoining highway. A relatively recently constructed detached garage has been built at the rear of 18 Kitchener Avenue, therefore some new development within the immediate vicinity ..is readily apparent.”

4.2.5. Existing Access.

- 4.2.6. School Road has no through route for vehicles, as such vehicle traffic is low. There is currently no rear access to 22a Kitchener Avenue off School Road. The other source of occasional vehicle access along School Road is for deliveries to the neighbouring school as it serves as occasional service entry for the school (not the main gate).



- 4.2.7. Deliveries to the existing pharmacy are to the Kitchener Avenue frontage.
- 4.2.8. The site is located within the built up urban area of Gravesend and is therefore a sustainable location for housing developments such as that proposed. The site is sustainably located with access to public transport means other than the private car.
- 4.2.9. The site is clearly highly accessible to shops, services and community infrastructure located on the Kitchener Avenue frontage. A bus stop is located some 40m to the north on Kitchener Avenue.
- 4.2.10. Landform & topography.
- 4.2.11. The site is level with no land stability issues.
- 4.2.12. Biodiversity Net Gain (BNG) , Landscaping, and Trees.
- 4.2.13. There are no existing trees on the site. The site is rough gravelled hardstanding, and hence there will be no impact on priority habitat, and the proposal is hence considered exempt from Mandatory BNG.



4.3. Design Principles.

4.3.1. Relevant Guidance.

4.3.2. Para 3.2.16 above sets out the relevant **Framework** policy by which this application should be considered.

4.3.3. **GLPCS** Policy CS19 “Development and Design Principles” provides that:

“New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti- crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

- *Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new 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. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;*
- *New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;*



- *New development will be located, designed and constructed to:*
 - *safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;*
 - *avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and*
 - *not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;*
- *The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;*
- *New development will be designed in an inclusive way to be accessible to all members of the community;*
- *New development will provide appropriate levels of private and public amenity space;*
- *New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;*
- *Car parking will be well related to the development it serves;*
- *New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;*
- *New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;*
- *The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;*
- *New development will incorporate appropriate facilities for the storage and recycling of waste; and*
- *The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism."*



4.3.4. Development Requirements.

4.3.5. The development requirement is to erect 2 no. two storey 2 bedroom semi detached dwellings.

4.3.6. Scale, Massing, Legibility & Continuity.

4.3.7. The proposal is not considered a major development, being a proposal for 2 modest dwellings within an existing highly urbanised area.

4.3.8. The 2019 Appeal Inspectors view on the design impacts of the neighbouring scheme are highly salient. Inspector Tivey found:

"I accept the introduction of a pair of two storey semi detached dwellings on the appeal site could in isolation appear at odds with their immediate surroundings although I see clear benefits in creating an active frontage along the eastern side of School Road. This would give rise to an uplift in the general ambience of the street scene, as well as providing greater natural surveillance for passing pedestrians. Combined with the enhancement of the remained of the existing site through the rationalisation of the yard and the space currently taken up by the dilapidated rear-most storeroom and other accretions that would be demolished, I consider that the aesthetics of the site would be significantly enhanced."

4.3.9. Inspector Tivey's findings surely apply to the application site, a similar level of "betterment" and enhancement of the aesthetics of the site must surely result from this proposal.



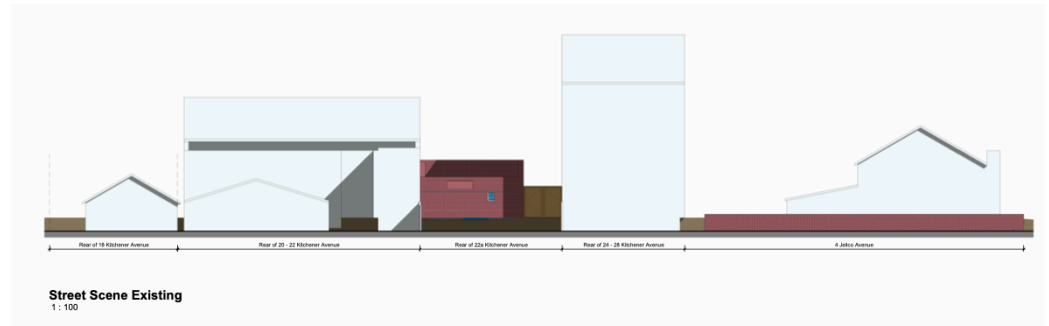


Image 3 – Existing street scene looking east from School Road.



Image 4 – Proposed street scene looking east from School Road.

4.3.10. The form and mass of the new dwellings will be of an appropriate scale to achieve a residential scheme on what is an infill development opportunity site. Design is contemporary and unostentatious for its setting, reflecting broad social aspirations for first time and middle income home buyers.

4.3.11. The fact the existing pharmacy building at 22a Kitchener Avenue is single storey, with a substantial windowless storeroom building to the rear, ensures there are no windows to residential addresses that would suffer adverse amenity impacts by way of loss of light, overlooking etc.



4.3.12. Private Amenity Space.

4.3.13. The surrounding curtilage can provide the new dwellings with ample private amenity space, rear garden areas of around 36 m.sq per dwelling are achievable.

4.3.14. Safe and Welcoming Places.

4.3.15. The development lies within a safe and accessible environment where crime and disorder and fear of crime are minimised through the consideration of natural surveillance from the proposed dwellings. Inspector Tivey recognised the benefit of “*greater natural surveillance for passing pedestrians*” on the neighbouring scheme in his decision letter.

4.3.16. Sustainability and Green Design.

4.3.17. The Framework puts great weight on approving sustainable proposals without delay. The NPPF defines three dimensions to sustainable development:

- An Economic Role
- A Social Role
- An Environmental Role

4.3.18. Economic: The proposal maintains and uplifts the value of the site to the benefit of the average value of neighbouring housing stock, and provides modest modern dwellings suitable for first time and middle income house buyers and potentially, older persons.

4.3.19. Social: The proposal ensures the site is being used efficiently in terms of providing a modest, but much needed, contribution to housing supply in the Gravesham plan area.

4.3.20. Environmental: As discussed at para 4.3.9 above the site delivers significant “betterment” and enhancement of the aesthetics of the site. The proposal achieves a good standard of private outdoor amenity space.

4.3.21. All building materials will be sourced from sustainable stocks wherever possible, and post construction, rubble and waste will be disposed of by an accredited waste disposal contractor.



4.4. Access Principles.

4.4.1. Access and parking

4.4.2. Vehicle access to the site will be served from School Road, onto hardstanding parking spaces (1 per dwelling) served by proposed dropped kerbs.

4.4.3. The Ground floor of the dwellings are to have level access from the parking spaces (for disabled user parking).

4.4.4. Inspector Tyver confirmed in his February 2019 decision letter in relation to the neighbouring site:

"Talking into account that vehicle movements from the proposed dwellings would be low I consider that at the very least there would be no increased potential for conflict between highway users.. due to the limited number of vehicle movements on the road it would be difficult to gather sufficient data to determine the exact visibility requirements by a speed survey. Nevertheless I doubt that vehicle speeds would exceed 10 mph, over such a short stretch of road.

On balance, I consider that the proposal would not give rise to harm to highway safety.."

4.4.5. A separate area for each dwelling will be provided for storage of refuse and recycling bins.

4.4.6. All internal configurations will comply with Building Regulations Approved Document Part M, 2021 edition that includes access to and into the centre, circulation within the building, and accessible electrical switches and sockets and W.C provision.

