

PLANNING & HOUSING STATEMENT

FORMER POLICE STATION, 133 WINDMILL STREET,
GRAVESEND, KENT

Redevelopment for retirement living accommodation for older people comprising 67 retirement apartments including communal facilities, access, car parking and landscaping



Submission on behalf of:

Churchill Living Ltd and Housing 21



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EXECUTIVE SUMMARY

- i. This Planning Statement has been prepared in support of a detailed planning application for a proposed retirement living development at the Former Police Station, 133 Windmill Street, Gravesend on behalf of Housing 21 and Churchill Living. The application proposes redevelopment of the site to form 67 x 1bed retirement living apartments together with access, parking and landscaping. The application is almost identical to consent granted on 15th February 2023 for the erection of 75 Retirement Living apartments for older people (Ref: 20220432) which has been implemented.
- a. This application follows a previous application on the site (reference 20220432) that was granted permission on 15th February 2023. The planning permission granted consent for the redevelopment for retirement living accommodation for older people comprising 75 retirement apartments. The proposals are very similar, with the design improved and reduced in scale and changes resulting from this being a partnership application between Churchill Living and Housing 21. The application seeks 100% affordable housing. The affordable units will be taken forward as 100% social rented and managed in perpetuity by Housing 21 alongside Homes England grant funding – the tenure is to be secured within the s106 agreement rather than planning condition to support Housing 21 continued growth.
- ii. The proposed design is an amendment to the previously approved scheme (Ref: 20220432). The main amendments to the scheme comprise of a reduction of unit numbers from 75 to 67, a change of unit mix to 100% 1 bed units, this is achieved through the reduction in height of the building from 5 storeys to 4 storeys and the building footprint has been slightly reduced.
- ii. The UK faces a rapidly growing and ageing population. The NPPF sets a requirement to “**significantly boost the supply of housing**”. The Government has provided a clear target to deliver 1.5 million new homes over the next five years and speed up the delivery of housing.
- iii. The Census data shows that on Census Day in 2021, there were more people than ever aged 65 years and over in England. In Gravesham around 18% of the population is aged 65 and over, which shows a high proportion of older people in the district, which is in line with the national average of 18%.
- iv. The site is vacant and brownfield in a highly sustainable location, within walking distance to the town centre and has planning consent for of 75 Retirement Living apartments for older people. **The NPPF is clear that substantial weight should be given to the value of using suitable brownfield land within settlements for homes (paragraph 125(c))** and the policy strengthened stating that proposals for which should be approved **unless substantial harm would be caused**. Significant weight should be given to the benefits of delivering as many homes as possible on brownfield land.
- iii. The revised NPPFs change in the calculation of a standard housing requirement has led to the Council **not being able to demonstrate a 5 year housing land supply** and the ‘tilted balance’ of **Paragraph 11(d) being engaged**. Gravesham Council issued a five year housing land supply statement updated to reflect the December 2024 NPPF changes which advises that the Gravesham can only demonstrate a 3 year housing land supply and therefore the

policies that are most important for determining the application should be considered to be out-of-date and given little weight in decision-making.

- iv. This is a suitable vacant brownfield site in a highly sustainable location, within walking distance of the town centre. The design ensures the scheme protects the character and amenity of the local area whilst maximising the use of previously developed land as required by the NPPF. **Paragraph 125(c) is clear that substantial weight should be given to the value of using suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused.** Paragraph 129 supports development that makes efficient use of land having regard to the identified need for different types of housing and the availability of land suitable for accommodating it.
- v. The proposal will deliver sustainable development in accordance with the NPPF, delivering a range of social, economic and environmental benefits. The development will encourage companionship, reduce loneliness and social isolation. It will encourage independence in later life with suitably designed housing and reducing reliance on residential and nursing care. Providing safety and security and reducing management and maintenance concerns.
- vi. Overall, the proposal will provide redevelopment of a brownfield site in a highly sustainable location. It will provide much needed housing for older people.
- vii. The site is a longstanding regeneration opportunity specifically referenced in CS05: *Gravesend Town Centre Opportunity Area* of the Core Strategy (2014).
- viii. It is considered there are numerous benefits associated with the development which should be afforded weight in the planning balance. These are summarised in the table below:

Planning benefits of the current proposal	Weight to be given
Provision of 67 units of residential accommodation	Substantial weight
Provision of much needed housing for older people, where the need for such accommodation is 'critical'.	Substantial weight
Provision of affordable housing	Substantial weight
Development of previously developed land	Substantial weight
Development in a sustainable location	Substantial weight
Efficient use of land	Moderate weight
Freeing up under occupied housing stock	Substantial weight
Economic benefits	Substantial weight
Social benefits	Substantial weight
Environmental benefits	Substantial weight
67 Affordable Housing units	Substantial Weight

- ix. The Council are currently unable to demonstrate a 5 year land supply and so the presumption in favour of sustainable development is engaged. In accordance with paragraph 11d(ii) there are no adverse impacts that would significantly and demonstrably outweigh the benefits when assessed against the development plan taken as a whole. The proposal should be approved without delay.

INTRODUCTION

- 1.1 This Planning Statement has been prepared by Planning Issues Limited, on behalf of Housing 21 and Churchill Living, in support of a detailed planning application for the redevelopment of the Former Police Station in Gravesend.
- 1.2 This application follows a previous application on the site (reference 20220432) that was granted permission on 15th February 2023. The planning permission granted consent for the redevelopment for retirement living accommodation for older people comprising 75 retirement apartments. The proposals are very similar, with the design improved and reduced in scale and changes resulting from this being a partnership application between Churchill Living and Housing 21.
- 1.3 The proposed design is an amendment to the previously approved scheme (Ref: 20220432). The main amendments to the scheme comprise of a reduction of unit numbers from 75 to 67, a change of unit mix to 100% 1 bed units, this is achieved through the reduction in height of the building from 5 storeys to 4 storeys and the building footprint has been slightly reduced.
- 1.4 The application seeks 100% affordable housing. The affordable units will be taken forward as 100% social rented and managed in perpetuity by Housing 21 alongside Homes England grant funding – the tenure is to be secured within the s106 agreement rather than planning condition to support Housing 21 continued growth.
- 1.5 There has been an amendment to the mix to a change of unit mix to 100% 1 bed units – this is based on correspondence with the councils Housing Enabling team to better meet the needs of those on the housing register.
- 1.6 In summary the changes comprise:
 - Provision of 100% social rented affordable retirement housing.
 - Change in housing mix to 100% 1bed units totally 67 apartments.
 - Increase in parking ratio from 0.31 to 0.32 spaces per unit.
 - Change in design to slightly reduce the height of the building from 5 storeys to 4 storeys removed previously approved dormers in the roof.
 - Loss of 8 units in total whilst reducing the building by a storey (from 5 to 4)
 - The buildings footprint has been slightly reduced.
- 1.7 This statement accompanies a detailed planning application. It should be read in conjunction with the following supporting documents which accompany the application:
 - Acoustic Assessment by 24 Acoustics,
 - Arboricultural Assessment by Barrell Tree Consultancy,
 - Archaeological Desk Based Assessment by Ecus,
 - Air Quality Assessment by AQA Consults
 - Biodiversity Net Gain Assessment by Tyler Grange,
 - Construction Management Plan by Churchill Living,

- Design and Access Statement by Churchill Living,
- Details of Fixed Telecommunication Infrastructure by Churchill Living,
- Flood Risk Technical Note and Drainage Strategy by AWP Partnership,
- Ground Investigation/ Site Investigation Report by Southern Testing,
- Heritage Statement by Cura Terrae,
- Detailed Landscape Strategy by James Blake Associates,
- Preliminary Ecological Assessment by Tyler Grange,
- Proposed Ground Floor Levels by Churchill Living,
- Sustainability and Energy Statement by Focus,
- Transport Statement by AWP Partnership,
- Written Scheme of Investigation for Archaeological Watching Brief by Ecus.
- Cycle Store Details by Churchill Living.

1.8 The application includes the following plans:

Site Location Plan	20085GD_PL101 Rev P1
Site Plan	20085GD_PL102 Rev P1
Ground Floor Plan	20085GD_PL103 Rev P1
First Floor Plan	20085GD_PL104 Rev P1
Second Floor Plan	20085GD_PL105 Rev P1
Third Floor Plan	20085GD_PL106 Rev P1
Roof Plan	20085GD_PL107 Rev P1
East Elevation AA	20085GD_PL108 Rev P1
North and West Elevation BB CC DD	20085GD_PL109 Rev P1
West and South Elevation EE FF GG	20085GD_PL110 Rev P1
Context Elevations	20085GD_PL111 Rev P1
Site Distances and Levels	20085GD_PL112 Rev P1

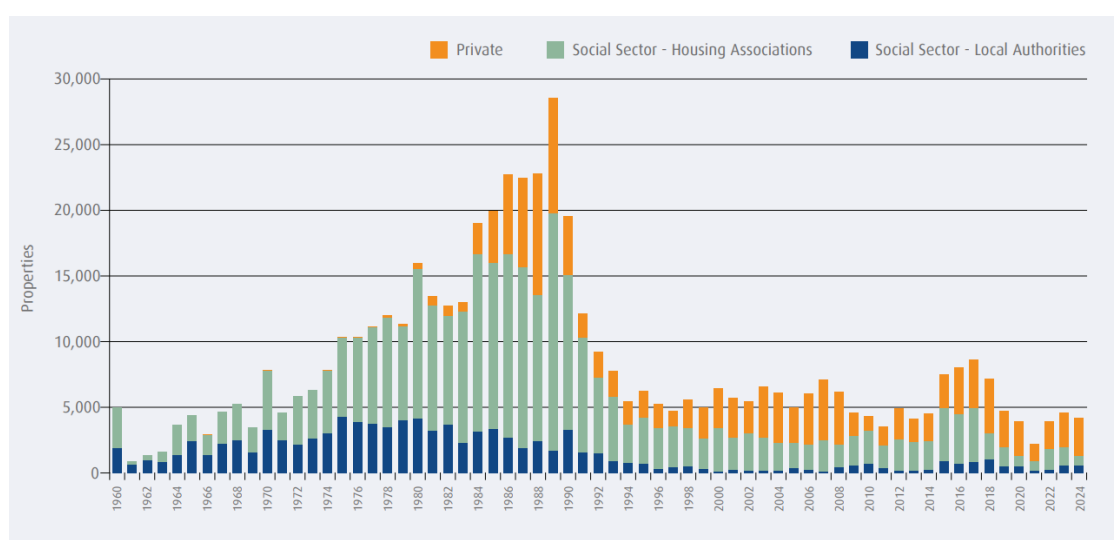
1.9 Additional Information is included within this application which relates to the condition discharge of some of the pre-commencement conditions that have been approved on the previous consent Ref: 20220432. These discharged conditions comprise:

- Condition 3: Construction Management Plan – discharged
- Condition 7: Archaeological Watching Brief – discharged
- Condition 11: Proposed Ground Floor Levels – discharged
- Condition 5: Site Investigation – discharged
- Condition 18: Installation of Fixed Telecommunication Infrastructure – discharged
- Condition 21: Cycle Store details - discharged

1.10 This statement briefly explores the national and local housing need; the planning policy context; an analysis of the scheme against the development plan and wider material considerations; and considers the overall planning balance.

OLDER PERSONS HOUSING

- 2.1 It is well documented that the UK faces an ageing population. The recently released Census data shows that on Census Day in 2021 there were more people than ever aged 65 years and over in England.
- 2.2 Between 2022 and 2047 over 56% of projected household growth will be made up of households with someone aged 65 or older. The 2022 sub national population projections predict that the number of people aged 65 and over will increase from 10.6 million to 14.7 million by 2047. This group has been and will continue to be the fastest growing age group.
- 2.3 Despite 18.6% of the population currently being aged 65 and over, retirement housing, including extra care housing, accounts for only around 2.6% of homes across the UK¹. As shown in the graph below, the delivery of specialist housing peaked in the 1980s and despite rapid ageing in recent decades – the delivery of specialist housing has remained at around 5,000-7,000 per year for the last 20 years. The graph fails to show that around 2000 sheltered homes are either demolished, disposed of or repurposed². With an ageing population, delivery clearly needs to increase.



Sheltered Properties Built by Year and Sector³

- 2.4 The Planning Practice Guidance includes a specific section on 'Housing for older and disabled people', which highlights that providing housing for older people is 'critical'. There is nowhere else in national planning policy where the delivery of a specific housing type is described in such terms.

¹ [Housing our ageing population | Local Government Association](https://www.housinglin.org.uk/publications/housing-our-ageing-population)

² [HLIN_APPG-HCOP_Re-HAPPI.pdf \(housinglin.org.uk\)](https://www.housinglin.org.uk/publications/housinglin.org.uk)

³ [HLIN_APPG-HCOP_Re-HAPPI.pdf \(housinglin.org.uk\)](https://www.housinglin.org.uk/publications/housinglin.org.uk) (June 2024)

- 2.5 The type of housing proposed is defined as retirement living or sheltered housing within the PPG. It sets out:

“Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.”

- 2.6 On 26th November 2024, the Older Persons Housing Task Force published their most up-to-date findings, looking at options for the provision of greater choice, quality and security of housing for older people. The taskforce was launched in May 2023, headed by Julianne Meyers, and accompanied by a host of industry specialists.

Partnership with Housing 21

- 2.7 Housing 21 are a Not for Profit Registered Provider of affordable homes for older persons – delivering retirement living and extra care accommodation, with over 700 schemes nationwide. Churchill will build the proposed scheme and Housing 21 will manage the proposed retirement apartments in perpetuity.
- 2.8 The age restriction needs to allow for those aged 55 and over, with a partner aged 50 and over. This restriction will be contained in the S106 agreement.
- 2.9 Based on their schemes across England, the age of tenants is set out below:

Age Range	55-59	60-65	66-70	71-75	76-80	81+
Number of residents	439	1595	2244	2640	2830	4023
Percentage	3%	12%	16%	19%	21%	29%

- 2.10 The table clearly shows the majority of residents are over 65, with the average age being 76. However reducing the age limit to 55 allows for the widest range of affordable housing needs to be met.

THE SITE AND PLANNING HISTORY

The Site

- 3.1 The site is located within the settlement boundary of Gravesend, the principle town of Gravesham Borough.
- 3.2 The site is located immediately to the south of Gravesend Town Centre, the shops, services and public transport facilities located therein.
- 3.3 The site is circa 0.36 hectares in area and is broadly square in shape. There is a decrease in gradient as you move south to north on Windmill Street of approximately 1 metre, however this is more pronounced adjacent to the Woodville Place access was historically used for basement parking and is broadly 2 metres lower than the remainder of the site.
- 3.4 The land was formerly in use comprising the site of the former police offices, a large, six-storey brutalist building. The building was vacated in 2008, when services were relocated to the new £30 million North Kent Police headquarters. The former police station building was demolished in 2016, and the site is largely cleared save for the high, brick perimeter walls.
- 3.5 The site's existing vehicular and pedestrian access is off Woodville Place to the north of the site.
- 3.6 The site is entirely covered by hardstanding and vegetation is limited to sparse ephemeral plant species that have populated the site's following demolition.

Planning History

- 3.7 This application follows a previous application on the site (reference 20220432) that was granted permission on 15th February 2023. The planning permission granted consent for the redevelopment for retirement living accommodation for older people comprising 75 retirement apartments. This has been implemented and so remains extant.

PLANNING POLICY FRAMEWORK

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 Other material considerations include the National Planning Policy Framework (NPPF) (2024) and the Planning Practice Guidance (PPG), relevant Supplementary Planning Documents and the emerging Local Plan.

The Development Plan

- 4.3 The development plan for Gravesham Borough Council comprises of the Gravesham Core Strategy (2014) and the 'saved policies' of the Gravesham Local Plan Review (1994).
- 4.4 The Council undertook such a review in September 2019 and the review 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 a sufficient land supply exists to meet the current need. The Council will also seek to replace the 'saved policies' of the Gravesham Local Plan Review (1994) via the emerging Local Plan.
- 4.5 The relevant policies of the Gravesham Local Plan are set out below:

Gravesham Core Strategy (2014)

- CS01: Sustainable Development
- CS02: Scale & Distribution of Development
- CS05: Gravesend Town Centre Opportunity Area
- CS07: Economy, Employment & Skills
- CS08: Retail, Leisure and Hierarchy of Centres
- CS10: Physical & Social Infrastructure
- CS11: Transport
- CS13: Green space, Sport & Recreation
- CS14: Housing Type & Density
- CS15: Housing Density
- CS16 Affordable Housing
- CS18: Climate Change
- CS19: Development & Design Principles
- CS20: Heritage & The Historic Environment

Gravesham Local Plan First Review (1994)

- P3: Vehicle Parking Standards
- T1: Impact of Development on Highway Network
- T2: Channelling Traffic onto the Primary and District Distributor Network

- T3: Development not well related to the Primary and District Distributor Network
- TC2: Listed Buildings
- TC3: Development Affecting Conservation Areas
- LT6: Additional Open Space in New Housing Development

Supplementary Planning Documents

4.6 The proposals will also give due consideration to the following Supplementary Planning Documents (SDP):

- Kent Design Guide (2021)
- Residential Layout Guidelines (2020) including Housing Standards Policy Statement (2015)
- Kent County Council Parking Standards (2025)
- Upper Windmill Street Conservation Area Character Appraisal (2009)

National Planning Policy Framework

4.7 The overriding message in the NPPF is one of sustainable development.

4.8 Paragraph 10 of the NPPF states that at the heart of the NPPF is a presumption in favour of sustainable development. There are three dimensions to sustainable development: economic, social and environmental and to achieve sustainable gains these should be sought jointly and simultaneously through the planning system.

4.9 On 12th December 2024, the NPPF was amended. Paragraph 11(d) now states that in relation to decision taking and the presumption in favour of sustainable development, schemes should be granted permission unless policies in the framework provide a “*strong*” reason for refusal- whereas it previously stated “*clear*”. Furthermore, the criteria for where planning permission should be granted when a development plan is considered out of date has been enhanced to state:

“Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

4.10 The NPPF adds explicit reference to the need to consider key policies. These are listed as those for directing development to include sustainable locations, making effective use of land and securing well designed places. The addition to 11(d) has put emphasis on the re-use of brownfield sites in sustainable locations which is highly relevant to the former Police Station site. Moreover, the new NPPF contains a significant emphasis on the efficient use of land and specifically brownfield sites.

4.11 The NPPF⁴ advises that policies in local plans should be reviewed to assess whether they need updating at least once every five years, and no later than five years from the date of the plan adoption and *should take into account changing circumstances affecting the area,*

⁴ Para 34, NPPF

or any relevant changes in national policy. It continues that relevant strategic policies will need updating at least once every 5 years if their applicable local housing need figure has changed significantly. The purpose of the review is to ensure that policies remain relevant and effectively address the needs of the local community⁵. It is acknowledged that policies will age at different rates according to local circumstances and that a plan does not become out of date automatically after 5 years⁶. The Local Plan for Gravesham is now well past its fifth anniversary.

- 4.12 **Paragraph 61 sets out the Government's objective to significantly boost the supply of housing.** Alongside the revised NPPF, the revised Standard Method has been published, which defines the local housing need for all local authorities in England and aggregates to a national total of 371,451 per annum. It is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community'. This is a recognition of the level of need for new housing across the country against the recent dwindling trend of housing supply.
- 4.13 **Paragraph 63** explicitly states that plan makers need to plan for housing for older people, including those who require retirement housing. In relation to the proposed development, the emphasis on meeting the housing needs of older people is retained at Paragraph 63 with the wording continuing to identify older people as a group that needs to be reflected within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) **those who require affordable housing and older people** (including those who require retirement housing, housing with care and care homes).
- 4.14 Paragraph 78 has reinstated the housing land supply requirement to a five-year supply with a five per cent buffer. **Gravesham Borough Council is unable to demonstrate a current five-year supply, the Council published there updated Statement to reflect the December 2024 NPPF which states:**
- Gravesham has the equivalent of a 3 years' supply of housing over the next five years. Consequently, Table 7 indicates that Gravesham is unable to demonstrate a deliverable supply of sites for housing against its housing need over the next five years from 2024 to 2029. Where the Council is unable to demonstrate a five-year supply of deliverable housing sites, the presumption in favour of sustainable development, as set out in paragraph 11 of the NPPF, comes into play.*
- 4.15 The Council's Local Plan is over 5 years old and unable to demonstrate a five-year supply of housing land against the relevant number of homes required, the NPPF states that "policies that are most important for determining the application" should be considered to be out of date and given little weight in decision making. This means the presumption in favour of sustainable development applies and paragraph 11d of the NPPF is engaged.

⁵ NPPG reference ID:61-062-20190315

⁶ NPPG reference ID:61-064-20190315

- 4.16 Paragraph 96 advises that planning should promote healthy, safe and inclusive places, which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 4.17 Paragraph 116 states *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 4.18 Paragraph 124 requires decisions to make effective use of land in meeting the needs for homes and other uses. Strategic policies are required to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land.
- 4.19 Paragraph 125 requires decision makers to *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”* In relation to the Former Police Station Site in Gravesend, it is unquestionable that this is a vacant and suitable brownfield site which is in much need of redevelopment. Therefore, in accordance with paragraph 125 of the NPPF, substantial weight should be given to the re-use of the site.
- 4.20 Paragraph 129 advises that planning decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development; and of the desirability of maintaining an area’s prevailing character and setting, or of promoting regeneration and change.
- 4.21 Paragraph 130 states that where there is an existing shortage of land to meet identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 4.22 Regarding plan making, the NPPF advises that policies in local plans should be reviewed to assess whether they need updating at least once every five years, and no later than five years from the date of the plan adoption and *should take into account changing circumstances affecting the area, or any relevant changes in national policy* (paragraph 34). The purpose of the review is to ensure that policies remain relevant and effectively address the needs of the local community. It is acknowledged that policies will age at different rates according to local circumstances and that a plan does not become out of date automatically after 5 years.

Emerging NPPF

- 4.23 On the 16th December 2025 the Government published a Draft National Planning Policy Framework for consultation alongside a written ministerial statement. The draft National Planning Policy Framework is currently open for consultation until the 10th March 2026. The draft National Planning Policy Framework is capable of being a material planning consideration but it is considered at the current time that very limited weight could be afforded to it.

Planning Practice Guidance

- 4.24 The Planning Practice Guidance (PPG) is a material consideration when taking decisions on planning applications. The PPG provides guidance on how policies in the Framework should be implemented.
- 4.25 In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising its importance. Paragraph 001⁷ states:
- “The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over, **by mid-2041 this is projected to double to 3.2 million**. Offering older people, a better choice in accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from early stages of plan-making through to decision-taking”* (emphasis added).
- 4.26 Paragraph 003 recognises that *“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”* This range of housing and support needs to be planned for.
- 4.27 Paragraph 006 sets out *“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”* Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.
- 4.28 Paragraph 016 sets out that *“Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people”*. It goes on to clearly state **“Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need”** (emphasis added).

⁷ PPG Reference ID: 63-001-20190626.

PLANNING CONSIDERATIONS

Principle of Development

- 5.1 The principle of retirement living on the site was established in the most recent consent (Ref: 20220432) in February 2023, this planning permission has been implemented, therefore a solely residential use on this site has been established and is deemed acceptable.

Sustainable Location

- 5.2 The site is within a highly sustainable location, within walking distance of the town centre of Gravesend. Residents seek to move into this area so that they can walk to local services and facilities, with many residents wanting to give up the use of their car.
- 5.3 **Policy CS02** on Scale & Distribution of Development states that the strategy prioritises development in the urban area as a sustainable location for development. The site is in a highly sustainable location in Gravesham and complies with the objectives of the policy. **Policy CS11:** Transport advises that new development should look to mitigate its impact on the highway network. The proposal is in a highly sustainable location close to Gravesend town centre and near public transport facilities and will reduce reliance on private cars, which is a key characteristic of retirement living apartments.
- 5.4 As set out by paragraph 125c of the NPPF (2024), decision makers should give substantial weight to the value of using suitable brownfield land within settlements for homes. Here the newly revised NPPF urges that proposals should on suitable brownfield land within settlements for homes should be approved unless substantial harm would be caused.
- 5.5 The benefits of delivering housing on land in a highly sustainable location should be given substantial weight in the planning balance.

Increasing Housing Delivery

- 5.6 The Council are unable to demonstrate a 5 year housing land supply and the 'tilted balance' of Paragraph 11(d) is engaged. Gravesham Council issued a five year housing land supply statement updated to reflect the December 2024 NPPF changes which advises that the Gravesham can only demonstrate a 3 year housing land supply and therefore the policies that are most important for determining the application should be considered to be out-of-date and given little weight in decision-making.
- 5.7 Paragraph 73 of the NPPF acknowledges the benefits in terms of delivery offered by small and medium sized sites. Paragraph 73 (d) requires local planning authorities to support the development of windfall sites, giving great weight to the benefits of using suitable sites within settlements for homes.

- 5.8 The planning system has a clear role in ensuring it delivers homes where they are most needed. As set out in paragraph 124 of the NPPF this means making as much use as possible of previously developed land.
- 5.9 The proposed development will be delivered within the next five years. **Overall, it is considered that increasing housing delivery should be given substantial weight in the planning balance.**

Older People's Housing Need

- 5.10 The 2021 Census shows for Gravesham, there has been an increase of 13.0% in people aged 65 years and over. In the 2021 census, the population of Gravesham that was aged 65 and over was 25.4%. This compares with the national average of 18%, showing a much higher proportion of older people in the district.
- 5.11 The ONS Population Projections data shows the 60 – 69 age group are set to see a rise of 11.2% in Gravesham between 2022 and 2032. Furthermore the Core Strategy fully notes that Gravesham has an ageing population and recognises in paragraph 2.4.3 that as a result of this, over the plan period there will be a need to provide dwellings suitable for an ageing population.
- 5.12 Policy CS14 on Housing Type and Size advises that 'Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provided for the needs of future occupants.' There is critical need for specialist older persons' housing in Gravesham, the proposal therefore are in support of this policy.
- 5.13 It should be noted that in May 2025, the Councils Housing Allocations & Voids Manager confirmed Gravesham Borough Council have a requirement of 148 over 55's (in age) needing a one bedroom housing accommodation. At that time, the Councils need for 2 bed accommodation was negligible. The application proposes that 100% of the units will be social rented. The proposals will provide the delivery of older persons social rented housing to meet the Councils Affordable Housing requirements over and above the requirements of Policy CS16 (Affordable Housing) of the Local Plan, this should be afforded substantial weight.
- 5.14 Overall, there is an identified need within the Local Plan for specialist accommodation for older persons during the plan period. The PPG is clear, *"where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need"*.
- 5.15 Paragraph 001 of the PPG on Housing for Older and Disabled People is unequivocal in its message that *"the need to provide housing for older people is critical"*. In this context, the benefits of the scheme in delivering older people's housing against the identified needs must be given substantial weight in the determination of this application.

Affordable Housing

- 5.16 As set out above the development proposes 100% social rented affordable housing. This will be owned and managed by Housing 21. The Council will receive 100% nomination rights from the Council's allocations register via a nominations agreement. Discussions have taken place with the Housing Enabling Team and there is an identified need for this type of development in Gravesend.
- 5.17 Housing 21 have worked collaboratively with Homes England and will apply for Homes England funding within the Affordable Homes funding Programme to facilitate the delivery of 100% affordable housing on the site to meet local housing need.
- 5.18 It should be noted that whilst as a general principal Housing 21 will seek to operate the social rented affordable housing in perpetuity, it is requested that the S106 agreement should include for two exclusions to any such requirement:
1. A clause clarifying that any such obligation is not binding on a mortgagee or chargee (or any receiver appointed by such mortgagee or chargee) of the whole or any part of the Property - or any successors in title to such mortgagee chargee or receiver if efforts to safeguard the relevant unit as an affordable home by way of transfer are not successful within a period of 3 months from the date of notice from such mortgagee or chargee to the local council.

Without such an exclusion, Housing 21 would face significant difficulties in raising finance against the property, limiting subsequent investments in affordable housing. This is a well-established principle in these types of development proposals. A model mortgage in possession clause is set out on the National Housing Federation website which can be found [here](#)

2. An exclusion for statutory or contractual rights for tenants to purchase (i.e. Right to Buy and Right to Acquire).

In such circumstance it should be noted that Housing 21 must recycle subsidy for alternative affordable housing provision under the terms of its grant funding agreement with Homes England, in accordance with the above NPPF definition (a(a)).

Viability and other S106 Requirements

- 5.19 The site benefits from an extant planning consent for a 100% open market proposal with no on-site affordable housing. A financial viability assessment was submitted as part of the extant permission planning application, and this was independently assessed on behalf of the council. This process concluded that it was unviable to provide affordable housing due to the costs of the proposal as well as site specific considerations.
- 5.20 This new proposal commits to provide affordable housing facilitated through the investment of affordable housing grant funding from Homes England under the Affordable Homes Programme. This funding facilitates the provision of affordable housing only at minimum grant rates sufficient only to allow delivery of affordable housing.
- 5.21 It remains the position that it is unviable to provide for other S106 contributions beyond affordable housing. The requirement to provide further monetary contributions beyond the affordable housing now proposed would be clearly unviable given that an extant permission for 100% open market housing exists on the site.

- 5.22 Should further information be required, the applicant will provide financial viability analysis to support this position.
- 5.23 The building is likely to be completed by April 2028.

Release of Under Occupied Housing Stock

- 5.24 The proposed development would free up general needs housing to provide much needed affordable homes for younger families.
- 5.25 Given the national housing crisis, it is important that the existing housing stock is best utilised to meet local housing needs. The proposal will not just meet the housing needs of older people but will provide opportunities throughout the whole housing market. **Substantial weight should therefore be given to the benefit of releasing under occupied housing stock.**

Accessibility

- 5.26 All the proposed dwellings will meet Part M4(2) standards. There will be level access throughout. The applicant is experienced in providing and managing apartments for older people there will be detailed design features to ensure the apartments are easy to live in and support independence in later life, such as easy opening handles, windows and light switches.

Design Considerations

- 5.27 Further information relating to the design and evolution of the scheme can be found in the supporting Design and Access statement.
- 5.28 Policy CS19: Development & Design Principles of the Gravesham Core Strategy sets out a range of criteria that new development must meet. Further detail is provided in the guidance and policies in the Kent Design Guide which have also been duly considered as part of our proposals.
- 5.29 The scale and design of the building has been strongly influenced by the existing character of the Upper Windmill Street Conservation Area, and by the approved permission (Application Ref: 20220432).
- 5.30 The built form is proposed to be four storeys with the removal of the roof accommodation (mansard roof and dormer windows) approved under application (Application Ref: 20220432). This reduced massing allows for the development to sit comfortably between and not compete with the 6-storey buildings north and south of which are both mentioned as local landmarks within the Upper Windmill St conservation area appraisal.
- 5.31 This proposal provides 4 storeys, the principal frontage of the development along the east elevation have been sympathetically split into 4 components with proportional bays through arrangement of windows. Further articulation is proposed through the use of contrasting materials to further assist with reducing the appearance of overall mass.

- 5.32 Following the approved scheme (Application Ref: 20220432), the building length facing Wrotham Road has been reduced to allow more separation distance to the properties along Wrotham Road facing into the site.

Noise Impact

- 5.33 The site is surrounded by roads where noise from road traffic e users on the neighbouring road network could impact the development.
- 5.34 A noise impact assessment has been undertaken on the site and an Acoustic report has been completed by 24 Acoustics which is submitted with the planning application.
- 5.35 24 Acoustics carried out a noise assessment of the site which found that with the recommended measures given, noise within habitable rooms would comply with maximum internal levels as stated in BS 8233:2014 and Noise levels in external amenity areas during the day are predicted to be acceptable.
- 5.36 The proposed development therefore complies with national guidance in terms of noise and disturbance.

Heritage

- 5.37 The applicant has submitted a detailed heritage statement produced by Cura Terrae, the report sets out that the site lies within the Upper Windmill Street Conservation Area, which itself contains a number of listed buildings and locally listed buildings, some of which are located opposite the stie. The Upper Windmill Conservation Area is considered to be of heritage significance due to its historic, architectural, artistic, and archaeological interests which are derived from the development of the area as a key thoroughfare in the nineteenth century.
- 5.38 In line with paragraph 219 of the NPPF and local plan policy CS20 (Heritage and Historic Environment, the redevelopment of the site will enhance the heritage significance of the Upper Windmill Street Conservation Area through removal of a gap site and infrastructure of no visual or architectural interest. This will result in improvements to the street scene along with the introduction of a building of visual interest and positive public realm.
- 5.39 The assessment has also concluded no harm on any historic buildings, both designated and non-designated as a result of the proposed scheme. The development takes the opportunity for regeneration and to introduce a sympathetic and appropriately designed building which will maintain the positive aspects of the setting of the historic buildings. The scheme will also remove a negative gap site and enhance the street scene which contributes to the setting of these heritage assets.
- 5.40 As the Heritage Statement has identified no harm and provides opportunities to make enhancements to the significance of heritage assets, the proposals are considered to accord with the Town and Country Planning (Listed Buildings and Conservation Areas) Act (1990) and comply with the NPPF and local planning policy (Policy CS20: Heritage and the Historic Environment).

Archaeology

- 5.41 An archaeological desk-based assessment (ADBA) was produced by Ecus Ltd (ref. 18582.2) in March 2022 to inform the planning application for the Site (Planning Application ref. 20220432). The report concluded that the ground had already been disturbed and that no archaeology is likely to have survived.
- 5.42 The applicant has submitted a Written Scheme of Investigation for Archaeological Watching Brief, the report was found sound and discharged the planning condition 7 of the planning permission reference 20220432.
- 5.43 The applicants both agree to continue with the agreed watching brief.

Landscaping & Trees

- 5.44 The application is supported by an Arboricultural Assessment undertaken by Barrells and detailed Landscape Strategy by James Blake Associates.
- 5.45 There are no trees currently within the site, however there are street trees adjacent to the site on the pavements on the eastern and western boundaries on Windmill Street and Wrotham Road.
- 5.46 The proposed development does not require the loss of any trees and the Tree Protection Plan demonstrates that the development can be progressed without adverse impact on these trees.
- 5.47 The detailed landscape strategy submitted with the proposals introduces additional tree planting on the site. Overall, it is concluded that the proposed development will improve the potential tree cover on the site and enhance the character and appearance of the area.
- 5.48 The proposed development will include landscape amenity space in the form of a communal garden area which will be maintained in perpetuity by Housing 21.

Ecology and BNG

- 5.49 The site has been cleared with the implementation of the extant consent.
- 5.50 A Biodiversity Net Gain calculation has been submitted as part of the planning application and demonstrates a +1811% net gain in habitat units, and a +418% in hedgerow units meaning a substantial increase of biodiversity net gain will be delivered on site. Substantial weight should be afforded to the substantial increase of biodiversity net gain.
- 5.51 This should be afforded substantial weight.

Highways & Parking

- 5.52 The existing approved access is to be retained.

- 5.53 As set out in the accompanying the Transport Statement, the development proposes the provision of 22 unallocated parking spaces. The consented scheme (ref: 20220432) for 75 retirement apartments has a parking ratio of 0.31 spaces per unit. This is a betterment increasing the parking ratio to 0.32 spaces per unit.
- 5.54 Policy CS11 broadly covers Transport within the Local Plan. The proposed scheme demonstrates having regard to Paragraph 115 of the NPPF and Policy CS11 of the Local Plan, the proposed scheme would result in a safe and suitable access and would not unacceptably impact on highway safety.

Refuse

- 5.55 Refuse collection is proposed to be conducted from within the internal layout where there would be access to the bin store. As per the Transport Statement swept path analysis has therefore been undertaken to demonstrate that the refuse vehicle can enter and exit the site in forward gear, manoeuvring within the internal car park.
- 5.56 Within the refuse room small bags or household waste and recycling material from each individual flat can be decanted into larger shared wheeled bins, clearly designated for specific waste storage.
- 5.57 Churchill Living and Housing21 have developed a detailed understanding of the typical waste requirements based on experience of their existing lodges. The vast majority of flats are single occupancy and the owners are daily basket shoppers typically with a low carbon footprint who generate small amounts of waste. The proposed refuse room is therefore suitable to meet the required needs.

Flood Risk & Drainage

- 5.58 The application is supported by an additional drainage note produced by Awcock Ward Partnership.
- 5.59 The proposed development has been assessed in line with the National Planning Policy Framework, to allow the planning application to be progressed and to show that the development can be undertaken in an acceptable manner from a flood risk perspective.
- 5.60 The proposed development is located within Flood Zone 1 and is not known to be susceptible to flooding from pluvial, groundwater, infrastructure or artificial sources.
- 5.61 The development will be safe from flooding throughout its lifetime and will actively reduce the flood risk to properties within the downstream catchment.

Sustainability

- 5.62 Policy CS18: Climate Change sets out the Council strategy on Flood Risk, Water Quality, Sustainable Drainage and Surface Water Run-Off, Water Demand Management and Carbon Reduction, Policy CS19: Development and Design Principles states that the Council requires a good quality of design.

- 5.63 The proposed scheme complies with Policy CS18 by developing a fabric first approach to sustainable construction, it also takes the opportunity of providing solar PV's on the roof.
- 5.64 The application is accompanied by an energy statement which sets out the extent to which the proposed sustainable design has maximised as much as possible renewable energy generation and water efficiency. The Proposals comply with both Policy CS18 and CS19 of the Local Plan.

Sustainable Development

- 5.65 Paragraph 7 of the NPPF is clear the purpose of the planning system is to contribute to the achievement of sustainable development. This statement puts sustainability at the heart of planning and is the thread that runs through the NPPF. Paragraph 8 of the NPPF sets out the component parts that constitute 'sustainable development', namely economic, social and environmental.

Economic Considerations

- 5.66 The NPPF identifies the planning system as having a key role in building a strong and competitive economy. The site is a vacant site which currently provides no economic benefit to the town.
- 5.67 Research by the Local Government Association has found that the value derived from sheltered housing can be found in benefits to the individual and to the community.
- 5.68 Research for the National Housing Federation⁸ identified clear financial benefits that are delivered by sheltered housing to local authorities across health and social care, particularly in increasing independence and reducing or delaying the need for older people to enter residential care. The Happier and Healthier Report has identified each person living in a home for later living contributes fiscal savings to the NHS and social care service of approximately £3,500 per year (Homes for Later Living September 2019).
- 5.69 Recent evidence within a report 'Silver Saviours of the High Street' (February 2021) has shown the significant economic benefits that retirement living developments can have on local high streets. The residents are 'basket shoppers', often walking into town on a daily basis to get the shopping they need. They will also utilise the high street during the week, when it's typically at its quietest.
- 5.70 **Substantial weight should be afforded to these economic benefits.**

Social Considerations

- 5.71 Housing for older people enables residents to be as independent as possible in a safe and warm environment. Retirement housing help to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs.

⁸ [Value of Sheltered Housing Report.pdf \(housinglin.org.uk\)](#)

- 5.72 Residents can walk to local shops and services, or use their mobility scooter, giving them independence if they are no longer able or wish to drive. This is important as people age, reducing reliance on formal social care or help from family and friends.
- 5.73 The requirement of the NPPF at paragraph 96 to achieve healthy, safe and inclusive places are a fundamental part of the scheme proposed.
- 5.74 **Overall, it is considered that substantial weight should be afforded to these social benefits.**

Environmental Considerations

- 5.75 The proposal is on brownfield land. It is a high-density scheme ensuring the optimum use of brownfield land as required by the NPPF, thereby reducing the need to use limited land resources for housing. A block of apartments is more resource and energy efficient than the equivalent number of detached dwellings.
- 5.76 The site is in a highly sustainable location. Shops and services can easily be accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- 5.77 The proposal will meet the relevant building regulations requirements and will assist in the reduction of carbon emissions. It will utilise a good thermal envelope to minimise heat loss as well as efficient heating and lighting systems to drive energy efficiency in the building.
- 5.78 The development will deliver a biodiversity net gain of +1811% of habitat units and a +418% net gain in hedgerow units. The proposal will enhance biodiversity in accordance with the Environment Act.
- 5.79 **Substantial weight should be afforded to these environmental benefits.**

PLANNING BALANCE

- 6.1 As set out above, Section 38(6) of the Planning and Compulsory Purchase Act requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 It is considered that when taken as a whole, the scheme complies with the development plan. The application should therefore be approved unless material considerations indicate otherwise. It is considered that in this case the material considerations weigh heavily in favour of the grant of permission.
- 6.3 The planning benefits with the weight to be given are set out below:

Planning benefits of the current proposal	Weight to be given
Provision of 67 units of residential accommodation	Substantial weight
Provision of much needed housing for older people, where the need for such accommodation is 'critical'.	Substantial weight
Development of previously developed land and re-developing a derelict site.	Substantial weight
Development in a sustainable location, close to the town centre	Substantial weight
Efficient use of land reducing the requirement to build housing on the Green Belt	Moderate weight
Freeing up under occupied local housing stock	Substantial weight
Economic benefits of the proposed scheme through job creation and enhancing town centre vitality and viability	Substantial weight
Social benefits including an intergenerational community, reducing isolation and creating community cohesion, together with benefits to health and wellbeing	Substantial weight
Environmental benefits of the proposed scheme including the delivery of ecological enhancements and a biodiversity net gain.	Substantial weight
67 Affordable Housing units	Substantial Weight

- 6.4 To reiterate, the site already benefits from planning consent for residential retirement apartments on site, therefore the principle for redevelopment of this site is already established. The Council are currently unable to demonstrate a 5 year land supply and so the presumption in favour of sustainable development is engaged. In accordance with paragraph 11d(ii) there are no adverse impacts that would significantly and demonstrably outweigh the benefits when assessed against the development plan taken as a whole. The proposal should be approved without delay.

CONCLUSION

- 7.1 The application proposes redevelopment of the site to form 67 x 1bed retirement living apartments together with access, parking and landscaping. The application is almost identical to **consent granted on 15th February 2023 for the erection of 75 Retirement Living apartments for older people (Ref: 20220432) which has been implemented.**
- 7.2 The UK faces a rapidly growing and ageing population. The Government aims to 'significantly boost the supply of housing'. **The PPG is unequivocal in its message that "the need to provide housing for older people is critical".**
- 7.3 The PPG is clear: **"where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."** Substantial weight should be given to the proposal considering the high levels of specialist housing needs.
- 7.4 Paragraph 125(c) which advises that decisions should **give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs**, proposals for which should be approved unless substantial harm would be caused. It is considered that the proposal complies with the new NPPF with particular regard to paragraph 125(c) and planning permission should be allowed.
- 7.5 The Council are **unable to demonstrate a 5 year housing land supply and the 'tilted balance' of Paragraph 11(d) is engaged.** Gravesham Council issued a five year housing land supply statement updated to reflect the December 2024 NPPF changes which advises that the Gravesham can only demonstrate a 3 year housing land supply and therefore the policies that are most important for determining the application should be considered to be out-of-date and given little weight in decision-making.
- 7.6 It is considered the redevelopment of this site being previously developed land, in a highly sustainable location complies with the aims of the NPPF. **The principle of retirement housing on site has already been established.**
- The proposal will deliver the following benefits:
- 7.7 **The delivery of 67 homes within the next five years.** The NPPF clearly sets out the Government's intention to significantly boost the supply of new homes. The delivery of market housing should be given substantial weight in the planning balance. **The weight to be given to this also needs to be substantial in light of the Council declaring a housing crisis.**
- 7.8 **The redevelopment of previously developed land.** This is a vacant brownfield site. It will reduce the need for housing development on greenfield sites. The NPPF is clear that decision makers should give substantial weight to the value of using suitable brownfield land within settlements for homes (para 125(c)). **Substantial weight should therefore be afforded to this benefit.**
- 7.9 **Redevelopment of a site which is in a highly sustainable location.** The site is close to the town centre, enabling residents and visitors to walk to the local shops and facilities they

need. This will reduce the need to travel by car and encourage sustainable modes of transport. **This should be given substantial weight in the planning balance.**

- 7.10 The proposals will provide the **delivery of 100% older persons affordable social rented housing**. The site will be owned and managed by Housing 21 in perpetuity, addressing the greatest housing needs in Gravesend **over and above the requirements of Policy CS16 (Affordable Housing) of the Local Plan, this should be afforded substantial weight.**
- 7.11 **Making efficient use of land.** The proposals have been carefully designed to protect the character and amenity of the surrounding area whilst ensuring an efficient use of land. **This should be afforded moderate weight in the planning balance.**
- 7.12 **The environmental benefits include efficient use of brownfield land**, reducing the need for greenfield release. Provision of solar panels on site; reduced water usage; and high-quality landscaping and ecological enhancements to meet well beyond 10% biodiversity net gain onsite. The development will encourage walking and reduce car usage. **These environmental benefits should be afforded substantial weight in the determination of this application.**
- 7.13 Paragraph 11 (d) of the NPPF is engaged in this case because of the Council's lack of a 5 year housing land supply. No footnote 7 policies are engaged that provide a clear reason for refusal. The tilted balance in footnote 11(d)(ii) of the NPPF applies and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. **There are no impacts that significantly and demonstrably outweigh the benefits; the application should therefore be approved.**