

Mrs Lisa Fisher
Planning Department
Gravesham Borough Council
Civic Centre
Gravesend
DA12 1AU

21st August 2026

Dear Lisa,

Application Ref: 20260131

Description: Erection of 67 Retirement Living Apartments for older people (comprising 67no. 1 bedrooms) including communal facilities, access, car parking and landscaping.

Site: Site Of Former Police Station 133 Windmill Street Gravesend Kent DA12 1DB

I write in respect of the above-mentioned planning application. Following the amendments submitted in April 2026, further information has been requested in respect of the proposed substation.

Please find enclosed:

- Updated contextual elevations PL111 P2
- Sub Station Details PL113 P1
- Updated Landscape Strategy JBA 20/0022-01 Rev C
- BNG Metric August 2026
- Post Development Habitats Plan
- Noise Assessment Update - Substation
- Updated Arboricultural Impact Assessment
- Updated Tree Protection Plan

The substation has been included following further information from the energy provider that it is necessary to power the development.

The substation has now been included on the contextual elevations (PL111 P2) and in addition more detailed substation plans are submitted to assist with your consideration (PL113 P1). The substation will be screened by a timber fence, which will be surrounded by landscaping. Apart from the gated access, from Wrotham Road and Zion Place the substation will be screened by new hedging. From within the site, landscaping will be planted up to the proposed fence. Further details of this are shown on the updated landscape strategy (JBA 20/002-01 Rev C).

The previously consented scheme on the site (ref 20220432) includes a substation in exactly this location. Below is a snapshot of the approved site plan PL001 P2 which shows this:



Approved Site Plan PL001 P2, Application Ref 20220432

A BNG Metric and BNG Gain Plan are both submitted to take account of the updated landscape strategy. They continue to demonstrate significant environmental improvements offered by this scheme, with a 2,348.02% net gain. I would be grateful if the net gain plan could be considered to enable the condition to become compliance.

As requested, an update to the Noise Impact Assessment is submitted. This shows that the operational noise levels of the proposed substation of 17 and 7 dB fall significantly below background noise levels of 40-50 dB during the day and 30-40 dB at night and would therefore generate a noise impact substantially below 'low' as defined in the standard.

An updated Arboricultural Impact Assessment is also submitted, demonstrating the sub station will have no impact on the existing trees but also taking account of the additional footpath that will extend through the RPAs.

I trust this information addresses your concerns about the proposed substation. Substations are provided on most of our developments and no complaints are received from new or existing residents.

This scheme seeks to provide 100% affordable retirement housing for local residents on a brownfield site in a highly sustainable location. The new NPPF Policy S4 sets out that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.

There are numerous and significant planning benefits associated with this application which I just wanted to reiterate:

- **The delivery of 67 homes within the next five years.** Policy HO7 of the NPPF sets out that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced based accommodation needs of the community. The July 2026 housing land supply assessment shows the Council can only demonstrate a 2.53 year housing land supply. The delivery of homes should be afforded substantial weight.
- **The provision of much needed housing for older people.** The housing register identifies a need for housing for older persons in Gravesend. 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. The delivery of older people's housing should be given substantial weight in the determination of this application.
- **The provision of 100% social rented affordable housing.** The site will be owned and managed by Housing 21, in perpetuity, and will address the greatest social housing needs in Gravesend. This should be given substantial weight in the planning balance.
- **The redevelopment of previously developed land.** This will reduce the need for housing development on greenfield sites. Policy L2 of the NPPF sets out that substantial weight should be given to the benefits of making better use of vacant and underutilised land and buildings. Substantial weight should be afforded to this benefit.
- **Redevelopment of a site which is in a highly sustainable location.** The site is in a highly sustainable location. This should be given substantial weight in the planning balance.
- **Making efficient use of land.** The proposals make an efficient use of land. This is in accordance with NPPF policies L2 and L3. This should be afforded moderate weight in the planning balance.
- **The proposal will assist in freeing up under occupied housing stock.** The proposed development will free up general needs accommodation to provide

much needed affordable homes for younger families. This should be afforded substantial weight in the planning balance.

- The **economic benefits** of the proposed development include savings to the NHS and increased spending in local shops and services. There will be jobs created throughout the construction and operational phases. These benefits should be afforded substantial weight in the determination of this application.
- The **social benefits** include encouraging independence in later life with suitably designed housing. This should be afforded substantial weight in the determination of this application.
- The **environmental benefits** include provision of solar panels on site; EV charging, high quality landscaping, and ecological enhancements resulting in a 2,348% biodiversity net gain. Substantial weight should be afforded to these environmental benefits.

The scheme is very similar to the approved scheme with the added benefit of providing 100% affordable housing. As highlighted above, Policy S4 of the NPPF requires development proposals within settlements to be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. It is not considered that there are any adverse effects that would substantially outweigh these benefits.

Yours sincerely,



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