



Delegated Report

Approval of Details Application

Planning Application No: 20251050

Location: Land At Market Car Parks Bank Street Gravesend Kent

Description: Application to comply with Schedule 1, Clause 1 (Residential Management Plan, Affordable BTR Management Scheme, Affordable Housing Plan and Marketing Strategy) and Schedule 2, Clause 5 (Travel Plan) of the Section 106 Agreement pursuant to 20200343.

Applicant: Reef Group

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

Marketing Strategy;
Residential Management Plan;
Management Plan and Affordable Housing;
Revised Final Travel Plan;
Covering Email;
TPC Cover Letter; and
Covering Letter.

Relevant Planning History

Reference	Description	Decision	Decision Date
20200343	Erection of 242no. residential units for Build to Rent (C3 Use Class), within three blocks ranging from 3 to 10 storeys, together with multi-storey car park as well as access, pedestrian links, landscaping, highway and other associated works	Permission	21.12.2020

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

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 4 – Decision-making
- Section 12 – Achieving well-designed places

Consultations, Publicity and Representations

Consultees

Internal

KCC – Highways and Transportation

I refer to the above planning application and having considered the amended document development proposals and the effect on the highway network, raise no objection on behalf of the local highway authority.

Officer's Analysis

Section 106 Wording

Schedule 1, Clause 1:

1.2 not to Occupy or cause or permit the Occupation of any Dwelling unit all of the following have been submitted to and approved in writing by the LPA:

- 1.2.1 the Residential Management Plan;
- 1.2.2 the Affordable BTR Management Scheme;
- 1.2.3 the Affordable Housing Plan; and
- 1.2.4 the Marketing Strategy;

Schedule 2, Clause 5:

5.2 Travel Plan

5.2.1(e) prior to Occupation of any Dwellings, review the Travel Plan (to include any remedial measures) and submit the reviewed Travel Plan to the County Council for written approval (such approval not to be unreasonably withheld or delayed);

Submission

The following information has been submitted to satisfy Schedule 1, Clause 1 (Residential Management Plan, Affordable BTR Management Scheme, Affordable Housing Plan and Marketing Strategy) and Schedule 2, Clause 5 (Travel Plan) of the Section 106 Agreement pursuant to 20200343:

Marketing Strategy;
Residential Management Plan;
Management Plan and Affordable Housing;
Revised Final Travel Plan;
Covering Email;
TPC Cover Letter; and
Covering Letter.

Residential Management Plan

The submitted Residential Management Plan outlines how the development will be managed as Build to

Rent (BTR) residential community in accordance with the requirements of the Section 106 Agreement. The document includes tenancy terms, property management standards, maintenance approach, customer service delivery and governance.

The submitted information addresses the wording of the S106 obligations.

Affordable BTR Management Plan and Affordable Housing Plan

The submitted Affordable Build to Rent (BTR) Management Plan and Affordable Housing Plan outlines the management, eligibility, affordability, and reporting arrangements for the Discount Market Rent (DMR) dwellings, ensuring ongoing compliance with the S106 obligations.

The submitted information addresses the wording of the S106 obligations.

Marketing Strategy

The submitted Marketing Strategy sets out how both Affordable and Private Build to Rent (BTR) dwellings will be marketed in accordance with clauses (a) to (f), ensuring that priority is given to eligible local applicants and that all marketing activities are transparent, inclusive, and compliant with the approved phasing and affordability criteria.

The submitted information addresses the wording of the S106 obligations.

Travel Plan

The submitted Final Travel Plan (November 2025) proposes the promotion of the existing sustainable transport modes, providing links to train and bus information, ticketing and bus vouchers, together with targets and management through the use of a travel plan coordinator and regular monitoring. The submitted information addresses the wording of the S106 obligations.

Conclusion

It is considered that sufficient information has been submitted in order to satisfy Schedule 1, Clause 1 and Schedule 2, Clause 5 of the Section 106 Agreement pursuant to 20200343.

Recommendation

Approval of details

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	12 th February 2026	Dated:	13th February 2026