

OUR REF: 4122.SC

PLANNING DESIGN & ACCESS STATEMENT



4 GOUGE AVENUE NORTHFLEET DA11 8DP

MAY 2024

1 INTRODUCTION

- 1.1** This statement is prepared in support of an outline planning application submitted on behalf of Nathan Bal and Ashveer Bains for the following development;

Outline application for the demolition of existing dwelling and erection of new residential development with layout and access to be determined.

in respect of land at 4 Gouge Avenue Northfleet DA11 8DP.

- 1.2** The application is a re-submission following the refusal of application 20240071 on 25 March 2024. The application was refused on the following grounds;

1. The proposed layout of the development hereby proposed fails to safeguard the amenity of neighbouring properties, through direct overlooking, loss of light, loss of outlook and sense of enclosure to habitable rooms of the adjoining bungalow, resulting in an unneighbourly form of development. Therefore, the proposal would have an overbearing impact on surrounding properties to the detriment of their amenity contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (2014) and paragraph 135 of the National Planning Policy Framework (2023).

2. The proposed access represents a risk to pedestrian safety by virtue of unacceptable and impeded visibility splays. Therefore, the proposal is contrary to Policy CS11 of Gravesham's Local Plan Core Strategy (2014), saved policies T1 and T5 of Gravesham's Local Plan First Review (1994), Kent County Council dropped kerb guidance (2023), as well as paragraph 115 and 116 of the National Planning Policy Framework (2023).

2 SITE CONTEXT

- 2.1** The application property, 4 Gouge Avenue is situated on the south west of Gouge Avenue some 50m from its junction with Park Avenue to the south east. Land levels along Gouge Avenue fall away from Park Avenue towards Thames Way.
- 2.2** The site is rectangular in shape and extends to 1264m² (approx. 0.13 ha) in area. It is some 78m in length and 16m in width and is currently occupied by a detached two-storey dwelling set-back into the site. It is adjoined by dwellings and their extensive rear gardens on either side.
- 2.3** The surrounding area is predominantly residential in character and is largely comprised of two-storey terraced dwellings. The dwellings either side of the application site are, however, detached bungalows. They are set slightly higher (approximately 1.2m) than the highway.

3 PLANNING HISTORY

3.1 The previous planning history relating to the property is as follows.

19490846 (TH/3/49/44): Use of land for residential purposes: Permitted 02/05/1949

20071085: Outline application for erection of a detached dwelling with car parking space: Withdrawn

20080488: Outline application for the erection of a detached dwelling with off-street car parking: Permitted 24/09/2008

20240071: Outline application with some matters reserved for the demolition of existing dwelling and erection of 4 no. residential dwellings, with layout and access to be determined. Refused 25/03/2024.

4 PROPOSALS

4.1 Planning permission is sought for the following development:

Outline application for the demolition of existing dwelling and erection of new residential development with layout and access to be determined.

4.2 It is proposed to demolish the existing dwelling and undertake a redevelopment of the site for residential purposes.

4.3 Drawing 4121.03 indicates that two pairs of semi-detached dwellings with one pair directly fronting the street and one pair behind would be provided. The dwellings would be separated by a distance of approximately 31m.

4.4 It is envisaged that the dwellings fronting the street would be two-storeys in height and the rear pair would be single-storey bungalows.

4.5 A new access is shown provided to the south of the front pair of houses and would serve a parking area located between the two pairs of dwellings which would provide two spaces per dwelling.

4.6 In response to the Council's refusal of the previous application the following changes have been made to these revised proposals.

- The access has been handed and is now on the south side of the site.
- The bin collection location has been moved further into the site.

5 PLANNING POLICY

5.1 Section 38(6) of the Planning and Compensation Act 2004 requires that where regard is had to the Development Plan decisions should be made in

accordance with the development plan unless material considerations indicate otherwise. The statutory Development Plan for the District comprises the Core Strategy 2014 and the saved policies of the Gravesham Local Plan First Review 1994.

- 5.2** Relevant policies in the Core Strategy are policy CS01 (relating to sustainable development that reflects the advice in the NPPF and the presumption in favour of approving development that accords with the development plan), CS02 (Scale and location of New Development), CS12 (Green Infrastructure), CS14 (Housing Size and Type), CS15 (Housing Density), CS18 (Climate Change) and CS19 (Development and Design Principles) which sets out general design principles to which new development should seek to comply. The relevant policies in the Gravesham Local Plan First Review 2014 are T1 (Impact of development on the Highway Network) and P3 (Vehicle Parking Standards) The policies are attached at **Appendix One**.
- 5.3** The adopted Development Plan must now be considered as largely being out of date, even though there is some conformity with the NPPF, but not in relation to the supply and delivery of housing (see below).
- 5.4** The National Planning Policy Framework (NPPF) December 2023 is also relevant as a material consideration. Paragraph 7 advises that the fundamental basis of the planning system is to achieve sustainable development and paragraph 8 outlines the three integral and intertwined overarching objectives in pursuit of sustainable development (economic, environmental and social). Paragraphs 10 and 11 set out a presumption in favour of sustainable development. Paragraph 11 advises that when decisions are made on applications, this means (taking into account the footnotes 7 & 8 in the NPPF which are reproduced below):

'c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date¹, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed²; or

¹ This includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.

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

- 5.5** Gravesham Council cannot currently demonstrate a five-year supply of deliverable housing sites. As of 1 April 2022 supply was calculated as 2.9 years. The Council has also un-delivered in terms of the Housing Delivery Test (HDT) to the point that a presumption in favour of granting permission for sustainable development applies for decision-making. The latest published HDT measurement issued on 19 December 2023 advises that only 53% of the required number of dwellings had been delivered in the previous three years, a worsening of the position from the previously published figure of 57%.
- 5.6** The application site is not within a protected area as set out in the NPPF but lies within 6km of one. A suitable mechanism has been put in place across North Kent to which Gravesham Council is a party-to that seeks to address the impact of development on the Thames Marshes Special Protection Area and Ramsar Sites. This arrangement allows for applicants to make a SAMMS payment to mitigate the impact on nearby Special Protection Areas/Ramsar Sites. This is referred to in more detail later in this statement.
- 5.7** Section 5 of the NPPF sets out policy in relation to the supply of homes. At paragraph 60, it continues to confirm the Government's objective to significantly boosting supply and that it is important to ensure that a sufficient amount and variety of land can come forward where it is needed. Paragraph 70 acknowledges 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 (amongst others) support the development of windfall sites through their policies and decisions.
- 5.8** Section 11 sets out policy in respect of making effective use of land. Paragraph 123 states that decision should promote an effective use of land in meeting the need for homes. Paragraph 124 expands on this point by promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. Paragraph 128 adds that decisions should support development that

² The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.

makes efficient use of land, taking into account (amongst others) the desirability of maintaining an area's prevailing character and setting.

- 5.9** It is noted that the application of paragraphs 60, 70, 123-124 and 128 all do not depend on whether an authority has a five-year housing land supply (5YHLS).
- 5.10** Section 12 of the NPPF provides guidance and policy on achieving well designed places. Paragraph 131 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. A bespoke design solution has been provided for this site; the resultant development will be of a high quality and will not detract from the character of the surrounding area.
- 5.11** Other material considerations include Gravesham's Residential Layout Guidelines (RLG), which is adopted Supplementary Planning Guidance from July 1996 amended in June 2020.

6 PLANNING ISSUES

- 6.1** The key issues for consideration in this application appear to be as follows;
- The principle of development;
 - Impact on the character of the area and amenities of nearby residents;
 - Impact on the Thames Estuary and Marshes Special Protection Area and Ramsar Sites.

Principle of Development

- 6.2** Planning permission was previously granted by the Council in 2008 for the erection of an additional dwelling on the site. This was not implemented and has now lapsed. Planning policies have not materially changed in the intervening period.
- 6.3** Due to the site not being identified in the Council's Strategic Housing Land Availability Assessment, this proposal involves a windfall site. There are no specific policies in the Development Plan that deal with the issue of such housing proposals. As noted above, support for windfalls, and specifically suitable sites within existing settlements for homes, is provided in the NPPF. The site is sustainably located within an urban area and constitutes a suitable windfall site and will result in more efficient use of land. As such, the proposed development accords with the advice in paragraph 70 of the updated NPPF. The application site is located within an urban area that is surrounded by residential development. In character terms, it is therefore an appropriate site for a residential redevelopment.

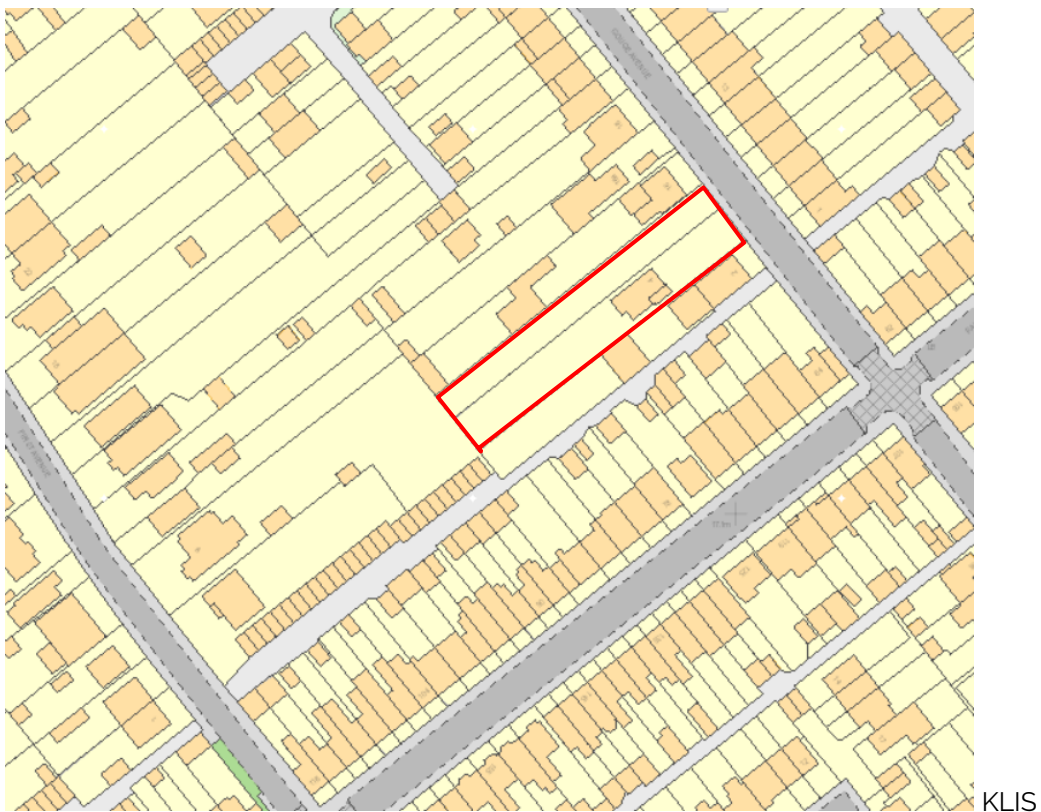
- 6.4** This coupled with the Council's worsening shortfall in housing land supply and the continuing and persistent under-delivery of housing to the point where only 53% of the requirement has been delivered over the last three years, such that a presumption in favour of sustainable development continues to apply, must lead to the conclusion that in principle, the provision of residential development on the site is acceptable.
- 6.5** The Council did not raise objections to the principle of development in relation to the last application. No objections were raised to indicated density at around 31 dwellings/ha which was considered to reflect the characteristics of the surrounding area or the proposed layout which was considered to be in character with the surrounding area.
- 6.6** Of course it remains necessary to consider whether the revised development proposals are acceptable in terms of their other details and potential impacts.
- 6.7** As indicated above these are, the impact on the character of the area generally (including adjacent dwellings as appropriate given the outline nature of the application), the impact of the development on the Thames Estuary and Marshes SPA and Ramsar site and any other pertinent issues.

Impact on the character of the area and occupiers of adjacent dwellings

- 6.8** The area around the application site is predominantly residential in character. The development will not be alien to this prevailing type of development and in principle as noted above, the provision of residential development on the site is acceptable.
- 6.9** The location, physical characteristics and size of the site is such that as indicated on drawing 4121.03 development in the form as proposed on the site layout can be satisfactorily accommodated.
- 6.10** The Council approved a (subsequently implemented) development to the rear of 44 Gouge Avenue in January 2004, application 20031032 refers. The dwellings on that site are bungalows. This was presumably to ensure that development would not adversely affect the amenities of the immediately adjacent bungalows at 23-31 (odd) Preston Road.
- 6.11** The relationship of that, more physically constrained, site to its immediate surroundings is indicated on the KLIS map extract shown below.



- 6.12** The clear difference between the 44 Gouge Avenue site and the current application site is immediately apparent from the KLIS map extract below and arises from the separation of the rearmost plots from nearby dwellings.



- 6.13** The two dwellings at the front of the application site respect the established 'building-line' in Gouge Avenue. The two dwellings at the rear would be located more than 53m from the rear of the houses in First Avenue to the south west, their flank walls would be in excess of 28m from the houses in Park Avenue to the south east and 31m or more from the two frontage plots and the rear of 2 and 16 Gouge Avenue
- 6.14** It is clear that the development will not result in harm to the character of the surrounding area in general. This was accepted by the Council in their consideration of the previous application.
- 6.15** In terms of maintaining the privacy and amenities of adjacent properties, given that scale and appearance are reserved matters, the detailed design of the proposed houses will follow, assuming that outline permission is granted in the terms sought.
- 6.16** However some conclusions can be drawn as to whether the proposed layout and siting of the dwellings respects the amenities of existing occupiers in nearby dwellings.
- 6.17** With regards to privacy distances, the Council's adopted SPG2 Residential Layout Guidelines states as follows.
- '17 Where windows of habitable rooms face each other (whether across a road, pedestrian way or private garden) a window-to-window distance of at least 21 metres should be provided. Habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms.*
- 18 In addition, a minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling.'*
- 6.18** The submitted proposed block plan clearly demonstrates that this requirement is met by the application proposals, which leave a distance of 31m between the two pairs of houses on the site. Given that the rearmost dwellings are proposed to be single-storey there would be no impact on the private amenity space at the rear of the two proposed frontage houses. This also applies to the relationship of the rearmost dwellings to numbers 2 and 16 Gouge Avenue.
- 6.19** This revised application directly addresses the principle concern of the Council on the previous application which was the impact on the privacy amenity and outlook of the occupiers of No.2 Gouge Avenue, particularly in respect of an extant (but unimplemented) Lawful Development Certificate Approval under application 20181018 granted on 8 November 2018 for proposed roof alterations which include the introduction of fenestration onto its north facing flank roof slope.
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- 6.20** The Council concluded that;
'The proposed development would erect a new dwelling 2.15m from the windows on the neighbour, which would have a detrimental impact on the outlook, create an unacceptable sense of enclosure and loss of light. As demonstrated by the screenshots below, some of the flank windows serve habitable rooms and therefore the development fails to safeguard neighbour amenity contrary to Policy CS19 (LPCS) and paragraph 135f of the NPPF (2023).'
- 6.21** The revised proposals have increased the total separation to around 6.1m. It is considered that this will no longer result in an unacceptable sense of enclosure or loss of light, should the permitted alterations ever be implemented.
- 6.22** Objections were raised to the separation from the rear units to the rear of No. 2. The rear projection that has recently been erected to no2 is single-storey. Given the rearmost dwellings would also be single-storey with intervening boundary treatment, no unacceptable overlooking would occur. The separation from the approved (unimplemented) hip-to-gable and new first floor window secured under 20181018 and the rear units would be 31m.
- 6.23** The use of the proposed access will not result in a loss of amenity to the occupiers of 2 Gouge Avenue in that appropriate boundary treatments and landscaping will be provided and adequate separation maintained. The level of activity and relationship will be no different to that which exist with other accesses in the vicinity of the application site.
- 6.24** Number 16 Gouge Avenue has no flank windows facing the application site and as such there will be no adverse impact.
- 6.25** It is contended therefore that the proposed development as revised will not adversely affect the general character of the area or the amenities of the occupiers of the dwellings that adjoin the site.

Impact on the Thames Estuary and Marshes Special Protection Area and Ramsar Sites and ecology/biodiversity

- 6.26** Policy CS12 of the Core Strategy seeks to protect and enhance Green Infrastructure and to ensure no net loss of biodiversity in the Borough. The Thames Estuary and Marshes SPA and Ramsar sites are an important and integral part of the Borough's Green Infrastructure, but they have increasingly been under recreational pressure from residential development in nearby areas on an in-combination basis, which has affected their role and existing biodiversity.
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- 6.27** A mechanism was put in place in 2015 following discussion with Natural England and the affected North Kent Authorities seeking to mitigate this in-combination impact and which led to the initiation of a SAMMS payment regime, which raises funds to undertake mitigation work to offset recreational impact. This is applied to all proposed residential development situated within 6km of the SPA/Ramsar Sites.
- 6.28** The applicant is willing to and will make an appropriate SAMMS payment of £942.15 (£314.05/dwelling) for the net increase of three dwellings on the site.
- 6.29** That being the case, it is contended that any in-combination impact on the SPA/Ramsar sites is capable of mitigation and the applicant has demonstrated their willingness to make the appropriate SAMMS payment. As such there will be no clear reason for refusing the development as set out in the footnote to paragraph 11(d) of the NPPF.
- 6.30** The application is accompanied by a preliminary ecological assessment and baseline Biodiversity Net Gain assessment. The survey indicates that no further survey work is required. Potential mitigation and enhancement measures are suggested in the report and can be secured by means of an appropriate condition. A completed BNG Metric has been submitted alongside the application as well as an indicative Biodiversity Net Gain plan for on-site improvement. A biodiverse green roof is proposed for the flat roofs of the rear two units, alongside extensive new mixed native species hedgerows and additional tree planting. The metric indicates the proposed measures will exceed the 10% improvement required.

Other issues

- 6.31** The proposed development will not result in a level of traffic generation that would result in an unacceptable additional impact on the local highway network or pedestrian and vehicular safety.
- 6.32** The proposed provision of two car parking spaces for each of the new dwellings plus visitor spaces is considered acceptable. Charging points for electric vehicles (Type-2) will be provided for the dwellings.
- 6.33** The site is an urban site of less than 0.5 ha in area and as such, in accordance with Core Strategy Policy CS16, there is no affordable housing requirement.

7.0 CONCLUSIONS

- 7.1** The Council's current lack of a five-year housing land supply and the presumption in favour of permitting development as a result of the consistent under-delivery of new dwellings against the Housing Delivery
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Test are factors that weigh significantly in favour of the approval of the application. The site is not within an area specifically listed in the footnote to Para 11(d) of the NPPF and any in-combination impact on the SPA and Ramsar sites will be addressed through the SAMMS payment that the applicant is committed to making. The 'tilted-balance' therefore applies to the determination of the application.

- 7.2** The proposed development being a small site that is capable of being delivered quickly and in making a small but nevertheless important contribution to the delivery of housing within the District, accords with the advice in paragraph 70 of the NPPF. This is particularly the case as the site is in an area where Development Plan policies are outdated in that they do not make specific provision for 10% of allocated sites being no greater than 1ha in area.
- 7.3** The development as now proposed, will not result in an unacceptable impact on the character and amenities of the area or the occupiers of the properties that are situated nearby or adjoin the site.
- 7.4** An appropriate SAMMS payment will be made to ensure that the potential recreational impact of the development in-combination with other planned and approved development on the Thames Estuary and Marshes SPA and Ramsar sites is mitigated. Appropriate Biodiversity Net Gain improvements can also be achieved to reach the required target.
- 7.5** For all these reasons, the Council are respectfully requested to grant planning permission for this revised and re-submitted development without delay in accordance with the NPPF.

APPENDIX ONE

Development Plan Policies



Gravesham Local Plan Core Strategy

Adopted September 2014



Connecting with the Community

Gravesham
Borough Council



Policy CS01: Sustainable Development

4.1.6 Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

4.1.7 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

4.1.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted.**

Policy CS02: Scale and Distribution of Development

4.2.24 The development strategy for the Borough is to retain and improve the existing stock of housing and suitable employment land and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028, and at least 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) during the plan period.

4.2.25 Development will be distributed throughout the Borough as follows: around 3,890 new dwellings and around 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East; Gravesend Riverside East and North East Gravesend; Ebbsfleet (Gravesham) and Gravesend Town Centre and on land at the Coldharbour Road Key Site; around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt.

4.2.26 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. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas;**

- The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;
- Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and
- Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including Land at Coldharbour Road Key Site.

4.2.27 In the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.

Policy CS12: Green Infrastructure

5.7.22 A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Green Infrastructure Network.

5.7.23 Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

5.7.24 There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

5.7.25 Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

5.7.26 The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of

Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.

Policy CS14: Housing Type and Size

5.10.8 The Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties.

5.10.9 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.

5.10.10 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 provide for the needs of future occupants

Policy CS15: Housing Density

5.11.5 Sites will be developed at a variety of densities, depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.

5.11.6 All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration:

- **Within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport hubs of Gravesend Town Centre and Ebbsfleet, higher densities will be sought;**
- **In the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.**

5.11.7 Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.

Policy CS16: Affordable Housing

5.12.9 The provision of affordable housing will be required on all new housing developments of: 15 dwellings or more or on sites of 0.5 hectares or more in the urban area; and 3 units or more or on sites of 0.1 hectares or more in the rural area.

5.12.10 The amount of affordable housing to be provided by private housing development sites above the threshold will be 30% in the urban area and 35% in the rural area.

5.12.11 The Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.

5.12.12 Development will be subject to site viability and a tenure mix necessary to meet local needs and achieve a successful sustainable and socially inclusive development.

5.12.13 In the Green Belt, limited affordable housing in a sustainable location for a proven and justified local community need will be supported. Such units once

constructed will be occupied by people with a proven local community connection. This includes affordable rural workers dwellings. In all cases, permissions granted under this policy will be restricted to those uses in perpetuity.

Policy CS18: Climate Change

Flood Risk

5.14.36 With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding.

5.14.37 Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests.

5.14.38 The Council will prioritise the maintenance, improvement or replacement of flood defence infrastructure over other land uses where relevant. In addition to meeting their own flood defence and management needs, the Council will expect new development to take advantage of opportunities to reduce the causes and impacts of flooding from all sources where it is technically and financially feasible.

Water Quality

5.14.39 As part of its approach to climate change and environmental improvement, the Council will have regard to the delivery of the Water Framework Directive and associated Thames River Basin Management Plan objectives to support water bodies being progressively improved to “good” status over the plan period. Sustainable Drainage and Surface Water Run-Off

5.14.40 The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:

- Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and
- Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.

Water Demand Management

5.14.41 The Council will seek to manage the supply of water in the Borough and reduce the impact of new development on the supply of potable water as much as possible. In particular, the Council will:

- Require all new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption). Where it can be demonstrated that a development is unable to meet these standards, or the additional standards set out below, permission will only be granted if provision is made for compensatory water savings elsewhere in the Borough;

- Seek 5% of homes on Key Sites to act as exemplars by meeting level 5/6 of the Code for Sustainable Homes in terms of water use (80 litres per person per day consumption);
- Require all non-residential developments of 1,000 sq m and above to meet the BREEAM "excellent" standards of water efficiency and include provision for the collection of rainwater; and
- Support proposals to retrofit existing residential properties in ways which reduce water consumption.

Carbon Reduction

5.14.42 The Council will seek to reduce the overall carbon footprint of the Borough. In particular, the Council will:

- In the context of national policy on the transition to zero carbon development via amendments to Part L of the Building Regulations, require proposals for development of the Key Sites throughout the Borough and other major development elsewhere in the Gravesend Town Centre Opportunity Area to consider the potential and include proposals for low carbon and renewable energy generation, including combined heat and power. Where choosing not to do so, applicants must submit evidence which demonstrates that compliance is not technically or financially feasible or that improved fabric energy efficiency or an allowable solution results in improved carbon saving benefits;
- Support stand-alone decentralised, renewable or low carbon energy development where it is compatible with national policies for protecting the Green Belt and where it accords with policies in this plan, in particular those relating to Development and Design Principles, Transport, Green Infrastructure, and Heritage and the Historic Environment; and
- Support other proposals which lead to a reduction in carbon footprint including the retrofitting of existing homes and businesses, including local initiatives based on carbon off-setting via allowable solution

Policy CS19: Development and Design Principles

5.15.14 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.

Gravesham Local Plan First Review
Saved and Deleted Policies Version (September 2014)

Connecting with the Community

Gravesham
Borough Council 

Policy T1

The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.

Policy P3

The Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates.