

Delegated Report

Planning Application

Planning Application No: 20260131

Location: Site Of Former Police Station 133 Windmill Street Gravesend Kent

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

Applicant: Churchill Living and Housing 21

Site Visit Date: 23/07/2026

Submitted Documents/Plans

Application Form

20085GD_PL101 P1 – Location Plan

20085GD_PL102 P2 – Site Plan

20085GD_PL103 P2 – Ground Floor Plan

20085GD_PL104 P2 – First Floor Plan

20085GD_PL105 P2 – Second Floor Plan

20085GD_PL106 P2 – Third Floor Plan

20085GD_PL107 P3 – Roof Plan

20085GD_PL108 P1 – East Elevation (AA) & Context Elevation

20085GD_PL109 P1 – North and West Elevation (BB, CC and DD)

20085GD_PL110 P1 – West and South Elevation (EE, FF & GG)

20085GD_PL111 P2 – Context Elevations

20085GD_PL112 P2 – Site Distances and Levels Plan

20085GD_PL113 P1 – Substation Enclosure Elevations Proposed

CRL:20085GD:201 B – Existing Site Sections

CRL:20085GD:709 – Proposed Broadband Provision

CRL:20085GD:710 – Proposed Internal Cycle Store

30 – Proposed levels

31 – Cut and Fill Volumes

32 – Site Sections

JBA/20/022-01 C – Detailed Landscape Proposals

21203-TPP-05 – Tree Protection

14480 P02 – Post Development Plan

Archaeology Note dated 14th July 2026

Construction Environmental Management Plan Rev D

Revised Flood Risk and Drainage Technical Note

Revised BNG Metric

Additional Ground Investigation and Risk Assessment Report

Revised Noise Assessment

Planning and Housing Statement

Preliminary Ecological Appraisal

Archaeological Desk Based Assessment

Archaeology Note Update

Heritage Statement

Revised Arboricultural Impact Appraisal and Method Statement

Written Scheme of Investigation for Archaeological Watching Brief
Energy Statement
Design and Access Statement
Air Quality Assessment
Transport Statement
Covering Letter
Covering Letter dated 21st August 2026
Viability Letter and associated documents.

Third Party documents:

Financial Viability Assessment from Pathfinder including all attachments

Superseded Documents:

~~20085GD_PL102 P1 – Site Plan~~
~~20085GD_PL107 P2 – Roof Plan~~
~~20085GD_PL111 P1 – Context Elevations~~
~~20085GD_PL112 P1 – Site Distances and Levels Plan~~
~~Revised Flood Risk and Drainage Technical Note Rev C~~
~~Revised Flood Risk and Drainage Technical Note Rev E~~
~~JBA/20/022-01 B – Detailed Landscape Proposals~~
~~BNG Metric~~
~~Noise Assessment~~
~~Arboricultural Impact Appraisal and Method Statement~~
~~21203-TTP-03 – Tree Protection~~
~~Construction Environmental Management Plan Rev C~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20220432	Demolition of existing structures on site and the erection of 75 Retirement Living apartments for older people (comprising 48 no. 1-bed and 27 no. 2-beds) including communal facilities, access, car parking and landscaping.	Permitted	15.02.2022
20130177	Application for Conservation Area Consent for the demolition of the buildings on site.	Permitted	21.08.2013
20120590	Application for renewal of planning permission reference number 20090409 for demolition of police and erection of four buildings, four-six storeys in height to provide a total of 86 self contained flats, comprising 30 x one bedroom, 48 x two bedroom and 8 x three bedroom flats with approximately 923 sq. metres of commercial floorspace at ground floor level in blocks B, C, D; laying out of 98 car parking spaces and cycle stores in basement.	Permitted	13.11.2013
20090409	Demolition of police station and erection of four buildings, four-six storeys in height to provide a total of 86 self contained flats, comprising 30 x one bedroom, 48 x two bedroom and 8 x three bedroom flats with approximately 923 sq. metres of commercial floorspace at ground floor level in blocks B, C, D; laying out of 98 car parking spaces and cycle stores in basement.	Permitted	13.08.2009
20080095	Demolition of police station and erection of four buildings, four-six storeys in height to provide a total of 86 self contained flats, comprising 30 x one bedroom, 48 x two	Permitted	30.04.2008

	bedroom and 8 x three bedroom flats with approximately 923 sq. metres of commercial floorspace at ground floor level in blocks B, C and D; laying out of 98 car parking spaces and cycle stores in basement.		
20080096	Application for Conservation Area consent for the demolition of the police station.	Permitted	27.03.2008

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS10 – Physical and Social Infrastructure
- CS12 – Green Infrastructure
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

As set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012 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, a further review is currently being progressed.

The September 2019 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 that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the then NPPF, the Council will also seek to replace these.

The August 2026 NPPF introduces significant changes and, in Annex 2, states that Development Plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight.

National Planning Policy Framework (2026)

- Section 3 – Decision-making policies
- Section 4 – Achieving Sustainable Development
- Section 6 – Delivering a Sufficient Supply of Homes
- Section 8 – Ensuring the Vitality of Town Centres
- Section 12 – Making Effective Use of Land
- Section 14 – Achieving Well-Designed Places
- Section 15 – Promoting Sustainable Transport
- Section 17 – Pollution, Public Protection and Security
- Section 18 – Managing Flood Risk and Coastal Change
- Section 19 - Conserving and Enhancing the Natural Environment
- Section 20 - Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020

- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Other Relevant Guidance

- Nationally Described Space Standard (NDSS)

Emerging Local Plan as a Material Consideration

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (Planning and Compulsory Purchase Act 2004) and section 70(2) of the Town and Country Planning Act 1990 (Town and Country Planning Act 1990) make it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise.

Decision Making Policy DM4 of the Framework sets out that when considering development proposals, relevant policies may be given weight, however, this is subject to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement, the Court found that the weight to be given to an emerging Local Plan was a matter of planning judgement, which had to be reached having fully considered the relevant part of the Framework, which, from 17 August 2026, is Decision Making Policy DM4 of the Framework.

The Council's emerging Local Plan has reached the Regulation 19 Consultation stage, with the consultation having ended on 18 August 2026. The emerging Local Plan does not form part of the Development Plan.

The Council is aware that third parties have raised objections to the wider emerging Local Plan and specific policies within it. Therefore, at present the Council cannot categorically state that the emerging Local Plan can be considered sound and consistent with the National Planning Policy Framework (2024) [as an emerging Local Plan being brought forward under the legacy system, it would be examined under the 2024 Framework]. Accordingly, at this stage of the process, only **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan.**

This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council fully aware of policies subject to unresolved objections and of policies whose soundness and conformity against the Framework have been challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Conservation Officer

No comments received.

GBC Environmental Protection

Updated comment on 03.09.2026:

The inclusion of an electricity substation into the scheme is noted. An assessment has been provided by 24 Acoustics and although not a full BS4142 assessment, the assumption made are sensible. Using data provided by the substation provider, noise levels at the nearest noise sensitive premises both on and off site are predicted to be well below the existing background.

Based on this there is not objection to the inclusion of the substation in the proposed location. If permission is granted then substation should be installed in accordance with the submitted details.

Updated comment on 28.07.2026:

It's noted that an updated CEMP (Rev D) has been submitted. This contains a Dust Management Plan at Appendix 6 which follows the guidance in the Air Quality Assessment.

This is acceptable.

Original Comment on 02.03.2026:

It is understood that this is a revision/amendment of the previously granted and implemented scheme under 20220432. This application reduces unit numbers from 75 to 67 by reducing in the building height from 5 to 4 storeys.

The following reports are relevant to Environmental Protection:

Air Quality Assessment by AQA Consults (Ref 13247B-10-R01-01-F dated 03/11/2025)

The methodology and findings of the report for both the construction and operational phase are accepted. Reference to appropriate guidance has been made.

For the construction phase, the assessment concludes that with appropriate mitigation measures, impacts will be 'not significant'. These mitigation measures are given in Table A5-1 and should be incorporated into a Dust Management Plan which can be submitted as part of a comprehensive Construction Environmental Management Plan.

Traffic movements associated with the development are below the trigger in the IAQM/EPUK guidance for a detailed air quality assessment to be undertaken. In terms of site suitability for future residents, pollutant levels have been falling in this area and have been below the AQO since 2022. No mitigation measures are therefore needed but it's noted that the development will include good practice measures - EV charging, provision of cycling/mobility scooter parking and an all electric energy strategy.

Construction Management Plan by Churchill Living (Rev C)

As advised in the Air Quality Assessment, the CMP needs to include a Dust Management Plan (measures given in Table A5-1). It is therefore advised that the CMP is revised to make reference to these more fully.

Noise Assessment by 24 Acoustics (dated 30th January 2026 R9433-2 Rev 1)

The report assesses the impact of noise from traffic on the future residents of the apartments. Providing the recommendations in the report for double glazing (Table 2) and ventilation systems (acoustic trickle/through wall ventilators or MVHR) are incorporated into the build, internal noise levels will be compliant with BS8233:2014. An external amenity area is to be provided in the southern part of the site. This is afforded some protection by its location and therefore noise levels are predicted to be compliant with the upper

guideline value of 55dB. Whilst it is preferred that levels in external amenity areas are 50dB or below, the upper guideline value of 55dB is acceptable in this area being a busy town centre location.

Ground Investigation/ Site Investigation Report by Southern Testing (11th April 2023 Ref J15380 Issue 2)
This report was submitted previously for a discharge of condition application under 20220432. The following comments were made:

The 'Additional Ground Investigation and Risk Assessment Report submitted by STC dated 11th April 2023 report follows on from earlier investigation on the site and has examined areas not previously investigated due to existing structures etc on site. A large underground storage tank previously indicated has now been located and removed. Due to the thickness of the encasing concrete, no evidence of any hydrocarbon egress was found. In addition, additional soil sampling and groundwater sampling did not provide any evidence of soil or groundwater contamination of the site. Based on the findings of this report, Condition 5 can be discharged.

Nothing further is required for contaminated land.

GBC Planning Policy

No comments received.

GBC Economic Development

No comments received.

GBC Leisure and Tourism

No comments received.

GBC Parking Services

No comments received.

GBC Housing

We can confirm Private Sector Housing have no comments to relay in relation to our housing legislations and regulations. We believe the proposed scheme is currently out of our remit with Planning requirements and Building Regulations taking precedence.

GBC Commercial Team (Regulatory Services)

There doesn't appear to be anything in these plans that would fall within this team's remit.

The plans do not propose any commercial kitchen / restaurant on site and health and safety matters would be enforced by the HSE

No objections

GBC Service Manager

No comments received.

GBC Waste and Refuse

I have reviewed the above planning application and the bin store appears to be in a good location with easy access.

In the design and access statement, it states; Churchill Retirement have developed a detailed understanding of the typical waste requirements attributed to their schemes based on research carried out from operational Churchill lodges across country.

I am interested to see how this strategy has led to the waste collection provision for this development. I am interested in the number of bins for both refuse and recycling plus the expected frequency of collection. The requirement for a food waste collection must be included in the plans

The Council operates a fortnightly collection for residual and recycling waste, with food waste collected weekly. If the development requires a more frequent collection, then a quote can be provided to cover the additional collection costs.

Developers are required to pay for the provision of all bins required for a development and these can be purchased through the Council. Developers are welcome to purchase their own 1,100 litre bins however the bins must be metal and comply with European Standard EN840.

Collections from sites will not occur until containers are in place. It is the responsibility of the developer to collect and remove any waste at their cost until the Council is satisfied that all waste requirements have been met. All complaints in regard to non-collection due to the fault of the developer will be passed onto the developer for response.

The Council should be informed at least two weeks prior to the waste collections by the council taking place.

GBC Council Tax
No comments received.

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
Yes	2348.02%	397.32%	1	No

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as significant and so does not require securing for 30-years. Even though there is no on-site significant habitat identified on-site for legislative biodiversity net gain, we recommend that a Landscape and Ecology Management Plan secures habitat retention and creation at the site under planning policy.

FULL COMMENTS

This application is for the erection of 67 apartments including access, car parking and landscaping. Due to on demolition works we are satisfied that no protected species are likely to be present within the site.

PROTECTED SITES

The application site falls within the 6km zone of influence of the Thames Estuary and Marshes Special Protection Area and its/their associated Wetland(s) of International Importance under the Ramsar Convention (Ramsar Site).

This type of development may cause additional recreational disturbance, and likely significant effects on birds using the SPA and Ramsar sites. As such, the North Kent Strategic Access Management and Monitoring Strategy (SAMMS), applies and the applicant will be required to make a tariff payment which is based on the net number of additional dwellings proposed. The payment is to mitigate for additional

recreational effects on the designated sites. The local planning authority must ensure that adequate means are in place to secure this mitigation before first occupation.

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended) and the National Planning Policy Framework (NPPF) 2026.

PROTECTED SPECIES

Bats

A Preliminary Roost Assessment identified that no Preliminary Roosting Features (PRFs) are on or adjacent to the site, indicating that bats are unlikely to roost within the site. However, numerous bat records exist in the wider area. Trees located to the east and west of the site, along with habitats in the wider area, are likely to support foraging and commuting bats.

Lighting in the vicinity of a bat roost or along commuting/foraging routes could result in disturbance, resulting in roost abandonment, which is an offence under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the National Planning Policy Framework (NPPF) 2026.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23 Bats and Artificial Lighting at Night' should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

Suggested Condition Wording:

No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity shall result. Such details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux contour plan showing light spill. The details shall be implemented as approved and retained thereafter.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2026. With consideration for bats and other nocturnal wildlife in accordance with the NPPF 2026.

Other Protected Species

The Preliminary Ecological Appraisal (PEA) was undertaken on 16th February 2022 and concluded that the site is unlikely to support protected species due to the absence of suitable habitat, and that it is of negligible ecological value with limited opportunities for protected species. The PEA refers to vegetation on site, which the Biodiversity Net Gain metric confirms 552m of ruderal/ephemeral vegetation was present. In our opinion, this would have offered a low potential to support breeding birds. However, upon review of satellite imagery indicates that this vegetation has now been removed as part of works carried out under a previous planning application (please see figure 1 & 2 below).

As the site is enclosed by fencing, roads, and other infrastructure, this further limits its accessibility and connectivity for commuting species such as reptiles and badgers. This, combined with recent site clearance, leads us to agree with the PEA's conclusion that the site currently provides minimal opportunities for protected species. Therefore, it is our view that there is limited potential for impacts to

other protected and priority species.

KCC Heritage

Updated Comments received on 12.08.26

This response aims to supersede my previous response given on the 13th May 2026, suggesting the need for archaeological conditions on this development. The demolition works that were previously carried out on the site were extensive and were subject to archaeological monitoring and I have since been in contact with the archaeological contractors (Currae Terra) who undertook this work, who were able to provide me with documentation demonstrating the extensive truncation of the entirety of the site. Therefore, I am now of the opinion that there is likely to be no archaeology remaining within the site and that no archaeological mitigation or conditions would be required as part of this development.

I hope the above advice is helpful and would be happy to discuss further.

Original Comments received on 14.05.26

Thank you for your letter consulting us on the above planning application.

The site of the proposed development has previously been subject to archaeological conditions (condition no. 7 of Planning application ref. 202220432) on demolition and other groundworks and this has revealed surviving structural remains dating relating to the WW2 era Civil Defence Control Centre (PCA 2024). The watching brief was able to demonstrate that while archaeological evidence of the Civil Defence Control Centre basement and foundation elements had been heavily truncated by later development, a significant proportion had survived. By carefully plotting the surviving remains with a GPS and overlaying them on to an existing plan of the Civil Defence Control Centre, the watching brief was able to confirm that parts of the basement did survive on site, as well as identify walls not marked on the basement plans.

The proposed development may impact upon areas of the site that the previous archaeological watching brief did not monitor, and further remains of the structures and deposits seen during the monitoring of the demolition works may be present.

For this reason I would recommend that a continuation of archaeological fieldwork in the form of an archaeological watching brief is carried out during this development and recommend the following condition. Areas of the site monitored and recorded during the previous watching brief would not require any further archaeological works

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of an archaeological watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that groundworks are observed and items of interest and finds are recorded, reported on and the new information made publicly accessible. The watching brief shall be in accordance with a Written Scheme of Investigation, which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded.

KCC Highways

This application is similar to that submitted under ref 20220432 which was given consent by GBC on 15th February 2023, except there is a reduction in the number of units from 75 to 67. The site is located within easy walking distance of Gravesend town centre and the railway station.

I have no objection in principle to the revised application for the same reasons as given in the previous application submitted in 2022, the parking provision being similar in number (which accords with KCC

Parking Standards (2025) for a town centre location and the likely traffic generation being considerably lower than the former police station use.

I do however repeat the same concern as raised previously that the existing lay-by fronting Wrotham Road is to be removed leaving the existing narrow footway that is obstructed completely by a number of mature trees. Currently pedestrians utilise the lay-by area, even though it does not form part of the public highway. It must be requested that part of the development proposals would be to widen the existing footway alongside Wrotham Road, particularly around the trees. This would then make walking routes around the site much improved, and the applicant should be requested to provide such an improvement but cannot be legally required.

I would also request that, since this is a retirement-type facility, that a dedicated ambulance parking space should be provided close to the building entrance. However, this generally only applies to care home when the likelihood of needing an ambulance is greater. This is therefore a request of the applicant and not a formal reason for objection on highway grounds.

Overall, no objection on highway grounds is raised to this proposal provided the Conditions given below are applied to any consent granted:

1 Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing.

2 Provision of EV vehicle charging for at least 3 parking spaces and cabling / ducting provided for the remaining spaces.

3 Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

4 Any gates / barriers to open away from the highway and to be set back a minimum of 6.0 metres from the edge of the carriageway.

5 The proposed units shall only be occupied by residents aged 55 and over

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls

which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

KCC Flood and Water Management

Kent County Council as Lead Local Flood Authority have reviewed the Technical Note prepared by AWP dated 28.05.2026 and have the following comments:

It is proposed to manage the surface water for the site through using raingardens, permeable paving, and a cellular tank prior to a restricted discharge at 2.1 l/s into the surface water sewer beneath Wrotham Road. Water butts will also be connected to external rainwater downpipes, to support landscape irrigation. We have no objections to the proposals in principle at this stage.

Should the Local Planning Authority be minded to grant permission, we would recommend for the following conditions are attached to any approval:

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Technical Note prepared by AWP dated 28.05.2026. The submitted scheme shall demonstrate compliance with the National Standards for SuDS at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding, pursuant to Paragraph 182 of the National Planning Policy Framework and the National standards for sustainable drainage systems (SuDS). These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

KCC Fire Safety Officer

Thank you for your letter dated 13 February 2026. Following my assessment of Fire and Rescue Service emergency access provisions for planning application; 20260131, I would like to make the following observations.

Upon reviewing the available plan drawings, I note the 'Site Plan' (20085GD_PL102, Rev P1) where access to the proposed site appears to be broadly compliant. I acknowledge the proposed dry risers serving stairs 1-3, however, dry riser 3 appears to be >18m from a suitably parked position despite the comments made within the Design and Access Statement under point 5.3 in relation to 18m to the 'site boundary'. Please ensure a fire appliance can reach within 18m of each proposed dry riser from the access road, and clearly visible.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5 in greater detail.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010

and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Economic Development

We refer to the above planning application which concerns proposed residential development at Site of Former Police Station, 133 Windmill Street, Gravesend DA12 1DB and comprising of up to 67 Retirement Living Dwellings.

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that it will have an additional impact on the delivery of its services. These impacts will require mitigation, either through the direct provision of infrastructure or the payment of an appropriate financial contribution. A summary of the projects serving the development and proportionate contributions requested is set out in Table 1.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Table 1 – Contribution Request Summary

Primary Education	Subject to a binding legal restriction (or planning condition) restricting occupancy age to the over 55s (or similar) for these dwellings, education, SEND and Integrated Children's Services contributions will not be applicable.
Secondary Education	
Special Education Needs & Disabilities (SEND)	
Integrated Children's Services	

	Per Dwelling (x67)	Total	Project
Community Learning & Skills	£34.21	£2,292.07	Contributions requested towards additional equipment and resources for Adult Education Centres and outreach provision serving the development.
Libraries, Registrations and Archives Service	£62.63	£4,196.21	Towards additional resources, equipment and book stock (including reconfiguration of space) at local libraries serving the development, including Gravesend Library.
Waste Disposal & Recycling	£194.13	£13,006.71	Towards new or expanded Waste Transfer Station(s) and HWRC(s) capacity within the Borough of Gravesham to serve the needs of the Development, including at Pepperhill
<i>Highways, PRow, SUDS, Ecology, Heritage, Conservation & Minerals.</i>	<i>Please note other KCC Service areas may respond separately</i>		

This application proposes retirement living accommodation. Therefore, subject to a legal agreement (or planning condition) restricting occupancy age to the over 55s (or similar) for these dwellings in perpetuity, Kent County Council will not seek Education, SEND or Integrated Children's Services contributions.

Please note that these figures:

- are to be index linked by the All-In Tender Price Index from Q1 2022 to the date of payment.

- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

Justification for Infrastructure Provision/Development Contributions Requested

The Developer Contributions Guide has been approved as County Council policy. Information on the areas KCC will seek for, contribution rates, methodology for calculation and policy justification are contained within the Guide and can be viewed here.

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out below and in the attached appendices.

Community Learning and Skills

KCC provides Community Learning and Skills (CLS) facilities and services in line with Framing Kent's Future – Our Council Strategy 2022/2026 (Priority 1 – Levelling UP Kent and Priority 2 – Infrastructure For Communities).

Appendix 2 provides detail of; the current shortfall in the provision of this service, the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Library, Registrations and Archives Service

Under the Public Libraries and Museums Act 1964, KCC has a statutory duty to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

There is an assessed shortfall in provision for this service. Borrower numbers are in excess of capacity, and book stock in Gravesham at 915 items per 1,000 population is below the National standard of 1,532.

An evaluation of the impact of this development is shown in Appendix 1. The appendix demonstrates; the demand generated by the application and proportionate cost requested. Table 1 identifies the mitigating projects serving the development.

Adult Social Care

The proposed development will result in additional demand upon Adult Social Care Services (ASC), including older persons and adults with Learning/Neurodevelopmental/Physical Disabilities and Mental Health Conditions.

Appendix 2 provides detail of the current shortfall in the provision of this service, and also explains the statutory duty upon KCC to provide Adult Social Care services. The appendix demonstrates; the demand generated by the application, the projects serving the development and proportionate cost requested to mitigate the impact arising from this development. Table 1 also identifies the mitigating projects serving the development.

The Department for Levelling Up, Housing and Communities identified in June 2019 guidance Housing for older and disabled people, that the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely.

The inclusion of two accessible M4(3) dwellings is welcomed. Given the previous use of the building KCC requests that all other dwellings are built to Building Reg Part M4(2) standard (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupant's requirements.

Waste Disposal and Recycling

Kent County Council is the statutory 'Waste Disposal Authority' for Kent, responsible for the safe disposal of all household waste. Appendix 3 provides detail of the current shortfall in the provision of this service, the demand generated by the application and also explains the statutory duty upon KCC.

The appendix demonstrates the projects serving the development and proportionate cost requested to mitigate the impact arising from this development, and accommodate the increased waste throughput within the Borough. Table 1 also identifies the mitigating projects serving the development.

Implementation

Any subsequent s106 agreement pursuant to approval of this Outline application will contain a formula to allow for the correct calculation of planning obligations at Reserved Matters stage. The above contributions

comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal. The Local Planning Authority is requested to seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement. Additionally, a County Council monitoring fee of £300 for each trigger point identified for County contributions within the Agreement is also required, irrespective of whether the County Council is party to the agreement.

Any Section 106 or UU containing contributions for KCC services should be shared with the authority via the Developer.Contributions@kent.gov.uk email address prior to its finalisation.

If you do not consider the contributions requested to be fair, reasonable, compliant with CIL Regulation 122 or supported for payment, it is requested that you notify us immediately and allow at least 10 working days to provide such additional supplementary information as may be necessary to assist your decision-making process in advance of the Committee report being prepared and the application being determined.

UK Power Networks

No comments received.

Southern Water

08.06.2026 (latest):

Inadequate capacity in the surface water network

Southern Water has undertaken a capacity check to understand the impact that the additional surface water flows from the proposed development will have on the existing public sewer network. This indicates that these additional flows may lead to an increased risk of flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will be provided by Southern Water. Please use the H3 guidance to offset as much surface water flow as possible from potentially entering the Southern Water network; <https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Alternatively, if this is a brownfield site redevelopment, the developer can discharge surface water flow no greater than existing levels if proven to already be connected and it is ensured that there is no overall increase in flows into the surface water system. The developer will be required to provide a topographical site survey and/or a CCTV survey with the connection application showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed surface water flow will be no greater than the existing contributing flows.

Condition

We request that should this application receive planning approval, the following condition is attached to the consent: Construction of the development shall not commence until details of the proposed means of surface water run off disposal in accordance with Part H3 of Building Regulations hierarchy as well as acceptable discharge points, rates and volumes have been agreed by the Lead Local Flood Authority, in consultation with Southern Water.

Sufficient capacity – Wastewater

There is currently adequate capacity in the local sewerage network to accommodate a foul flow of 0.67 l/s for the above development at manhole reference TQ64736801. Please note that no surface water flows (existing or proposed) can be accommodated within the existing foul sewerage system unless agreed by the Lead Local Flood Authority in consultation with Southern Water, after the hierarchy Part H3 of Building Regulations has been complied with.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewerage-sector-guidance-approved-documents/.

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment or commitment to any adoption agreements under Section 104 of the Water Industry Act 1991.

Environment Agency

Thank you for consulting us on the above application.

We have no comments to make on this planning application as it falls outside our remit as a statutory planning consultee.

Please refer to the attached 'When to consult the Environment Agency' document for guidance on when to consult us.

Please note: If the application at a later stage proposes the use of non-mains drainage, we will need to be re-consulted.

National Grid

No comments received.

Natural England

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin. Natural England's statutory advice on these potential impacts is set out below.

Designated Sites

Further information required - recreational pressure impacts to European Sites (habitats sites)

This development site is within the zone of influence (Zol) for recreational pressure impacts to one or more European Sites (habitats sites).

Within this Zol, proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the European Site(s) (habitats site(s)) through increased recreational pressure when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s).

Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the Natural England Access to Evidence - Conservation Objectives for European Sites and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on the integrity of the European Site(s) (habitats site(s)) in relation to recreational disturbance.

Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS). Refer to Developers: get environmental advice on your planning proposals - GOV.UK (www.gov.uk) for more information.

Impact Risk Zones for Sites of Special Scientific Interest

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal (arcgis.com) and to use on MAGIC (defra.gov.uk) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk) provides

further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

Health and Safety Executive

The proposed development site which you have identified does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.

This advice report has been generated using information supplied by Admin User at Gravesham District (B) on 06 July 2026.

NHS

NHS Kent and Medway Integrated Care Board (ICB) is the NHS organisation that plans and buys healthcare services to meet the needs of 2 million people living in Kent and Medway. It is our responsibility to ensure health services and all future proposed developments are sustainable from a revenue affordability, capital investment and workforce perspective. We must also ensure that, wherever possible, we maximise the delivery of care closer to where people live.

NHS Kent and Medway Integrated Care System brings partnership organisations together to plan and deliver joined up health and care services to improve the lives of people across Kent and Medway. Within the Integrated Care System there are place-based partnerships, referred to as Health and Care Partnerships (HCP), that bring together the providers of health and care services, along with other key local partners, including local councils, to work together to plan and deliver care.

This letter provides a response to the above application which concerns up to 67 residential dwellings.

We set out in the NHS Kent and Medway Developers Contributions Guide, how the ICB uses the SidM health tool to analyse planning applications in order to understand the population demand arising from the new housing units. Our assessment utilises the housing information provided in the application.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) requests for planning obligations must comply with the three specific legal tests:

1. Necessary
2. Related to the development
3. Reasonably related in scale and kind

We have applied these tests in relation to this planning application and can confirm the following specific requirements.

£ contribution	Population	Required obligation (Wording for S106 agreement)
£67,752 Index Linked	74 population (with gain factor applied)	Towards refurbishment, reconfiguration and or extension to general practices that cover the development and other healthcare facilities within a 3-mile radius of the development site or towards new healthcare facility to be provided in the community in line with the healthcare infrastructure strategy for the area. To allow the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises projects. To enable proactive development and delivery of a project the trigger of any healthcare contribution should be linked to commencement or an early stage of development, with the funding being available in full and not provided in phases.

Justification for infrastructure development contributions request

The proposed development will increase demand on primary and community healthcare services provided to the local population. The proposed development currently falls within the general practice boundaries of Old Road West Surgery, Pelham Medical Practice, Parrock Street Surgery, Rochester Road Surgery, Gravesend Medical Centre, and Springhead Health

The objectives and principles set out in the Kent and Medway ICB Estates and Infrastructure Strategy and Dartford, Gravesham and Swanley Health and Care Partnership Estates Strategy are to support transformation to deliver placed based care and improving population health outcomes through healthcare facilities that maximise integrated working.

The ICB Estates Strategy and area-based estates plans and priorities will continue to change and evolve as strategic assessments continue to be undertaken for an area informed by changes to healthcare provision, national policies and guidance and council local plans. However, the need from this development, along with other new developments, will need to be met through the creation of additional capacity in primary and community care facilities.

Whilst it is not possible at this time to set out a specific premises project for this contribution, we can confirm that, based on the current coverage of health care services and location of this application, we would expect the contribution to be utilised as set out above. Any premises plans will include the pooling of S106 contributions where appropriate.

I would be grateful if you could advise me of the Council's decision in due course. In the meantime, should you require any further information or points of clarification please contact me using the above email address.

Kent Police Designing Out Crime Team

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be

evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.
2. Perimeter, boundary and divisional treatments must be 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
3. Parking – to minimise the opportunity for crime, vehicles should be parked in areas with natural surveillance, where they can be seen from an “active” window i.e. lounge or kitchen and sufficient lighting. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.
4. Any current or new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than “round shaped” trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
5. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) Guide 2025 states: “19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features.” Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
6. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.
7. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
8. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.
9. We recommend “A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019” for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.
10. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
11. Security Compartmentation is required in larger apartment blocks (over 25 units) or fewer in densely populated buildings or areas of higher crime. It helps reduce the opportunity for crime, the taking over the home of a vulnerable person in order to create a base for criminality and unauthorised free access throughout the building. It can be achieved with formal access control on lifts, staircases and lobby doorsets on all floors.
12. Cycle, buggy stores and bin Stores must be well lit and lockable, with controlled access for the residents within the flats.
13. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along

with a freestanding post box of SBD/Sold Secure approved Gold standard. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the ground floor to prevent access to all areas.

14. CCTV is advised for all communal entry points and to cover the mail delivery area.

15. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict.

16. Community areas/ gardens will also require more natural surveillance, appropriate boundary treatments and access control as they generally attract Crime, ASB and nuisance. It is also advised that tools and equipment that are either of high value, or can be used to commit an offence are either not left overnight or secured in lockable storage areas.

17. Public Footpaths should be at least 3 metres wide to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people.

18. Planting. We would recommend dense / prickly planting to ensure individuals stay on pedestrian routes, and do not create desire lines, or spaces where potential offenders can hide from view.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Southern Gas

Thank you for your enquiry, there is a high pressure pipeline in the vicinity of your works. Your proposals would require the exact location of this pipeline and other SGN assets to be located before any work commences, either by electronic detection or by hand excavated trial holes as specified in the attached SW/2 document. These works must be supervised by an SGN representative, please contact Thomas Skinner on 07974455867 / thomas.skinner@sgn.co.uk to arrange a pre-works site visit and any future supervision. We would like to reiterate that no works should be carried out within the vicinity of a high pressure pipeline until consultation with an SGN representative has occurred. We thank you for your patience at this time.

Please note that no mechanical excavations are permitted within 3m of the pipeline at any time.

This pipeline is registered with the Health and Safety Executive as a Major Accident Hazard Pipeline.

SGN High Pressure Gas Pipelines in the vicinity of your works		
Pipeline Number	Pressure Regime	Building Proximity Distance (Zone 1)
GM20	HP	9.0
This table does not include SGN's low medium and intermediate pressure assets, which may be in the vicinity.		

Building Proximity Distance

The building proximity distance (Zone 1) for the pipeline is shown in the table above for all our high pressure gas pipelines in the vicinity of your works. This should not however be confused with the HSE consultation zones 2 & 3 which will be considerably greater, further guidance of the requirements can be found in HSE Document: PADHI: HSE's Land Use Planning Methodology. Zone 1 is a safety factor with reference to habitable buildings as recommended by IGE TD/1. It is calculated from the diameter, material, wall thickness and pressure of the particular pipeline. Under Pipeline Safety Regulations 1996 this distance is declared to the HSE. Any intrusion within this safety zone will not be taken lightly and any intention to

proceed should be accompanied by a risk assessment or provision of other supporting evidence, especially in the event of any legal proceedings at a later date.

Vehicle Crossing

Vehicle crossings over the pipeline must be kept to a minimum and must cross at 90 degrees. The crossing will require agreement with SGN and may require design and calculations, as evidence to prove there is minimal added stress to the pipeline. Method statements must be agreed before works commence.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW/2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence. Further guidance / restrictions are detailed below:

1. No mechanical excavation is allowed within 3 metres either side of pipeline.
 2. No plant or storage of equipment shall be made within any easement strip.
 3. If any metallic pipes or cables are being laid in proximity to gas pipelines then interference testing will be required, the cost of which to be borne by the promoter of the works. A minimum clearance of 600mm is required.
 4. All precautions stated in publication SGN/WI/SW/2 (Safe Working in the Vicinity of High Pressure Gas Pipelines) shall be fully complied with in all respects. Acceptance of SGN/WI/SW/2 shall be acknowledged by the responsible site person signing and returning the form Appendix A (back page) to the SGN representative contacted in (7).
 5. No thrust boring shall take place within 3 meters of the pipeline.
 6. All planting within the easement strip should comply with 'Notes for Guidance on Tree Proximity'.
 7. Before commencing work on site you must contact our Pipeline Maintenance Section on the number above at least seven days before work commences. A Southern Gas Networks representative will then contact you to arrange to visit site. Details of working near to high-pressure gas pipelines can then be discussed.
 8. Pipeline sections that are planned and agreed by SGN to be permanently covered (i.e. by road surface) will require a coating survey. SGN will repair any indicated coating defects free of charge. The survey costs will be borne by the promoter of the works. Prior to any surface cover cathodic protection coupons and reference cells will require installation at no cost to SGN.
 9. This pipeline is cathodically protected and as such has test cables located in test posts, were these to be lost through this work we would look to you for remedial action at no cost to SGN.
 10. Intrusive construction methods will require an agreed method statement prior to work starting.
 11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.
 12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or boreholing must take place within 3 metres of the pipeline.
- Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.
- Please note that further restrictions on activities may need to be imposed as a result of a site inspection.

Network Rail

No comments received.

Arriva Southern

No comments received.

Southeastern

After a review of the proposal, it is considered that this development isn't in close proximity to the railway line or Gravesend station to significantly impact Southeastern. Gravesend station is already a fully accessible station with lifts and stairs and accessible from both platforms.

Therefore, please accept this email as confirmation that Southeastern have no comments on this Proposal.

Gravesham Access Group

No comments received.

Gravesend Historical Society

No comments received.

National Highways

Referring to the consultation on a planning application dated 13 February 2026 referenced above, in the vicinity of the M2 and A2 (Trunk Road) near the Gravesend that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

a) offer no objection (see reasons at Annex A);

Southeast Coast Ambulance Service

No comments received.

Neighbouring properties

136 surrounding properties were consulted and the overall consultation period expired on 23.09.2026. 4 comments were received in total. 2 representation, 1 objection and 1 comment in support.

Summary of Representations:

- New residences are in a good location, close to public transport options, medical facilities and shops.
- Wonderful community will come together.
- Hope that the building will be 3 floors high.
- The site currently looks like a dump.
- Clearer details of timeframe for completion should be given to nearby residents.

Summary of supporting comment:

- Details in the Transport statement are excellent.

Summary of objection:

- Windmill Street and Zion Place are conservation areas so concerns are raised regarding obstructing the view particularly to Zion Place would contravene the requirement that new developments preserve or enhance the character and appearance of the conservation area in line with Section 72 of the Planning (Listed Building and Conservation Area) Act 1990.

Officer's Analysis

Housing Need

The Local Plan Core Strategy was adopted by the Council in September 2014 and is more than five years old. Local housing need is therefore calculated using the Government's Standard Method, establishing a baseline requirement of 687 dwellings per annum.

The Housing Delivery Test (HDT), published by the Government on 17 August 2026, sets out that the presumption in favour of sustainable development applies within the Borough. National decision-making policy S3 of the Framework sets out that decisions on development proposals should apply a presumption in favour of sustainable development, as follows:

- a) National decision-making policy S4 of the Framework should be applied when considering development proposals within settlements;

- b) National decision-making policy S5 of the Framework should be applied when considering development proposals outside settlements (development in the Green Belt or on Local Green Space is not assessed under this policy and must instead be determined against the relevant Green Belt and Local Green Space policies, where it is not inappropriate paragraph 2 of S5 is to be applied); and
- c) In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies of the Framework are to be approved without delay.

The Council's most recent Five-Year Housing Land Supply Statement, covering the period 2025-2030, identifies a deliverable supply of 2,053 dwellings against a buffered requirement of 4,056 dwellings (based on the 2025 outcome of the standard method). The Council is therefore currently unable to demonstrate a five-year supply of deliverable housing land. This position equates to a housing land supply of 2.53 years. National decision-making policy HO7 sets out that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, taking into account evidence produced for the Council e.g. a local housing needs assessment, and the needs for different groups.

The proposed development is for a net increase of 67 residential units, which would contribute towards meeting an unmet need for general market housing as identified in the Council's Local Housing Need Assessment (October 2025). Therefore, substantial weight should be afforded to meeting the needs of the housing needs of the community, as set out in NDMP HO7, which states *substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community*.

However, this has to be balanced against other requirements of the Development Plan and the NPPF 2026, including as set out in National decision-making policy DP3 Para.3, compliance with relevant development plan policies when assessing the design quality of proposals i.e. Local Plan Core Strategy Policy CS19: Development and Design Principles. This and other matters will be discussed in detail in the sections below.

Principle of Development

The application site comprises a vacant previously developed site located on the southern edge of Gravesend Town Centre within the Gravesend Town Centre Opportunity Area. The site occupies a highly sustainable location with convenient access to shops, services, healthcare facilities and public transport. The site has a long planning history and has previously benefited from planning permission for mixed-use and residential redevelopment proposals, most recently planning permission ref. 20220432 for the erection of a 75-unit retirement living development, which has been implemented.

The current proposal seeks permission for a revised retirement living development comprising 67 one-bedroom apartments together with communal facilities, access, parking and landscaping. Whilst the current application must be assessed on its own planning merits, the implemented permission is a significant material consideration and demonstrates that the principle of retirement living accommodation on the site has previously been accepted, and is a fallback position.

Policies CS01 and CS02 of the Gravesham Local Plan Core Strategy support sustainable development within the urban area, whilst Policy CS05 identifies the Gravesend Town Centre Opportunity Area as a focus for regeneration and redevelopment.

As set out in NDMP Policy S3 of the NPPF (2026), decisions on development proposals should apply a presumption in favour of sustainable development. For considering developments within settlements, i.e. Northfleet and Gravesend (the urban area), this means applying NDMP Policy S4 of the NPPF (2026). NDMP Policy S4 of the NPPF (2026) goes on to state that *development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse*



effects, when assessed against the national decision-making policies in this Framework.

The proposal would make effective use of a vacant brownfield site within a sustainable town centre location and would contribute towards the provision of specialist accommodation for over 55s in the form of retirement living accommodation. These benefits are also supported by Policies HO7, TC2 and L2 of the NPPF (2026), which respectively attract substantial weight to meeting evidenced accommodation needs, relevant benefits of town centre development and making better use of vacant and underutilised land.

Accordingly, the principle of the proposed development is considered acceptable, subject to the detailed assessment of the scheme set out below. The proposal accords with Policies CS01, CS02 and CS05 of the Gravesham Local Plan Core Strategy (2014) and is supported by national decision-making Policies HO7, TC2 and L2 of the National Planning Policy Framework (2026). Whether the proposal fully accords with NDMP S4 will depend on the detailed assessment.

Design, Character and Appearance

The application site occupies a prominent location on the southern edge of Gravesend Town Centre within the Upper Windmill Street Conservation Area. Following demolition of the former police station, the site forms a highly visible brownfield site, which is boarded, where any redevelopment will have a significant influence on the character and appearance of the surrounding area. Consequently, the design quality of the proposed development is of particular importance.

The proposal retains the established design concept of the implemented planning permission through the provision of a 'T' shaped, block development arranged between the landscaped courtyard and parking area, creating active frontages to Windmill Street, Wrotham Road, Zion Place and Woodville Place whilst providing a secure and attractive communal amenity space for future residents.



Approved Site Plan (20220432)



Proposed Site Plan



Approved Contextual Elevations (20220432)





Proposed Contextual Elevations



NORTH ELEVATION (BB) (WOODVILLE PLACE) scale 1:100



WEST ELEVATION (CC) scale 1:100



WEST ELEVATION (DD) (WROTHAM ROAD) scale 1:100

Proposed North and West Elevations



Proposed South and West Elevations

In comparison with the implemented planning permission (ref. 20220432), the proposal retains the same design approach but reduces the overall scale of development. The scheme has been reduced from 75 to 67 apartments and the building reduced from five storeys to four storeys, by removing the roof accommodation element. The approved scheme has an approximate height of 14m, while the proposed scheme would be approximately 13.8m, so there would be a very minor reduction in physical height. However, the visual prominence would be reduced by the removal of windows from the roofscape. The reduction in scale and bulk of the development would lessen the visual prominence and perceived bulk of the building and is considered to be a positive factor in the overall assessment of this application.

The proposed elevations retain the approach taken in terms of material design under the approved and implemented permission reference 20220432. It would continue to use contrasting brickwork and lighter panels, with recessed and projecting sections that divide the building into clearly defined vertical elements. This gives the four storey block a more varied appearance when viewed from the surrounding streets. These features break up the building's overall mass, provide visual interest, and respond positively to the varied character of the surrounding townscape. The brickwork and pitched roof would be appropriate alongside the varied materials and roof forms within the Upper Windmill Street Conservation Area. The footprint of the building and landscaped courtyard arrangement remain broadly consistent with the implemented permission, therefore retaining an appropriate relationship with the surrounding streets whilst delivering an efficient form of development on this sustainable brownfield site. The design responds to the local character and heritage setting in accordance with Policy CS19 and the adopted Design for Gravesham Design Code. The detailed colours, textures and detailing would be important to the finished appearance, particularly given the site's prominence and its relationship with nearby listed buildings. These details would therefore be secured by condition.

The proposal includes perimeter landscaping and a good sized courtyard, together with boundary treatments and soft planting which would soften the appearance of the development and provide an attractive setting for the building. The development would make a positive contribution to the streetscene.

The site lies within the Upper Windmill Street Conservation Area and within the setting of nearby listed buildings. To the east; 38-50, 51-54 and 55-59 Windmill Street are Grade II Listed. As such, the Local Planning Authority has had special regard to the desirability of preserving the setting of listed buildings pursuant to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and has paid special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area in accordance with Section 72(1) of the Act.

Although buildings on the site have been demolished, the original boundary wall on the Windmill Street frontage contained the foundation stone of the earlier fire and police station and Civil Defence Control Centre that used to occupy this site. The previous approval recommended retaining and reinstalling this stone, where appropriate and if possible, on the site. This was agreed in the previous application, and our records indicate the stone is currently in storage.

Heritage

The site is located in the Upper Windmill Street Conservation Area and is nearby Grade II Listed buildings on St Georges Terraced (38-50 Windmill Street), 51-54 Windmill Street and 55-59 Windmill Street to the east of the site. The submitted Heritage Statement and plans identify these areas given their proximity and location in relation to the subject site. As per Policy HE5 of the NPPF (2026), The significance and contribution made by this setting form part of this assessment. The significance of this Conservation area comes from both its historic street patterns and surviving nineteenth century buildings, including the aforementioned Grade II Listed terraced. The architectural interest of these buildings is evident in their three-storey form, brickwork and sash windows. The application site forms part of the wider context in which these buildings are viewed. Although the former police station has been demolished and the site is now empty, redevelopment here would remain prominent in views along the street. The proposed building would have a different scale from the listed buildings, but its elevational design including the vertical breaks created by using contrasting materials, would reflect the wider character.

Policy HE6 of the NPPF (2026) identifies that Substantial weight shall be given to conserving heritage assets. The proposed building would retain the broad design approach of the implemented permission, with a similar footprint and elevation design and materials, albeit with the roof accommodation not omitted. Having regard to the siting, form and proposed materials and subject to a condition securing the final façade finishes, the development would preserve the character and appearance of the Conservation Area and the setting and significance of the nearby listed buildings. It is concluded that there is no identifiable harm to significance of the Conservation Area or nearby Listed Buildings. The proposal would therefore satisfy policy HE4 in that it would preserve the existing heritage significance and further assessment under HE6 is not required.

Having carefully assessed the submitted plans and Heritage Statement and the relationship of the development with surrounding heritage assets, it is considered that the proposal would preserve the character and appearance of the Upper Windmill Street Conservation Area and preserve the setting of nearby listed buildings. The reduction in height, design prominence and overall scale compared with the implemented permission further assists in reducing the visual impact of the development within the Conservation Area whilst maintaining a high-quality appearance which would be appropriate in this prominent town centre location.

Overall, the proposal is considered to represent a well-designed development which responds appropriately to its context and would successfully regenerate this prominent brownfield site. The proposal would conserve the significance of the Upper Windmill Street Conservation Area and the setting of nearby listed buildings and is therefore considered to accord with Policies CS19 and CS20 of the Gravesham Core Strategy (2014) and national decision-making Policies DP3, HE4, HE5, HE6 and HE9 of the National

Planning Policy Framework (2026).

Archaeology

Policy CS20 of the Gravesham Local Plan Core Strategy seeks to conserve and enhance the Borough's historic environment, including archaeological heritage. National decision-making Policy HE5 of the National Planning Policy Framework (2026) requires the significance and potential effects on heritage assets, including archaeological interest, to be properly assessed, while Policy HE10 requires archaeological assets to be preserved in situ where feasible and otherwise appropriately investigated, recorded and made publicly accessible where loss occurs.

The site has previously been the subject of archaeological investigation undertaken pursuant to Condition 7 of planning permission reference 20220432. The archaeological watching brief identified surviving structural remains associated with the Second World War Civil Defence Control Centre. Whilst later development had truncated parts of the structure, the investigation confirmed that elements of the basement and associated walls survived beneath the site.

Kent County Council Archaeology having had the opportunity to consider the information gathered in relation to Condition 7 of planning permission reference 20220432, have confirmed that the proposed development would not harm any archaeological areas on site (as none exist).

Therefore, having regard to the previous archaeological investigation and the updated advice from KCC Archaeology, no further archaeological works are considered necessary in connection with the current proposal. The development is therefore considered acceptable in archaeological terms and accords with Policy CS20 of the Gravesham Local Plan Core Strategy and national decision-making Policies HE4, HE5 and HE10 of the National Planning Policy Framework (2026).

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy seeks to ensure that development provides a high standard of amenity for future occupiers. National decision-making Policy DP3 requires development to support liveability and healthy, integrated communities, whilst Policy P3 requires healthy living conditions, including adequate light and avoidance of unacceptable air, noise and other pollution. As this is specialist housing for older persons, Policy HO9 also requires appropriate access to frequently-used services and delivery to M4(2) or M4(3) accessibility standards.

It is noted that one objection was received from a member of the public concerned about the impact of the development on the conservation area. The 2 representations and 1 supporting comment are also noted which approve of the quality of the transport statement, improved character, design and community benefits, and sustainable location.

The proposal would provide 67 purpose-built retirement living apartments together with communal facilities including a residents' lounge, wellbeing facilities, mobility scooter storage, refuse storage and extensive communal landscaped amenity space. The development has been specifically designed to meet the needs of older persons and provides opportunities for social interaction whilst allowing residents to maintain independent living.

The Residential Layout Guidelines SPG (2015), provides expected internal space standards for flats, maisonettes and bedsits as follows:

Table 3

Function of room	Floorspace
Double bedroom	11.2 sq. m.
Single bedroom	6.5
Living room	13.2
Dining room	9.5
Kitchen	7.2
Kitchen/diner	12.0
Lounge/diner	18.0
Bathroom & WC	3.5
Bathroom only	2.8
WC only	1.3
Bedsits (including Kitchen/bathroom/WC)	30.0
Hallways & landings	900mm width

The floor plans indicate that the smallest units are 51.1m² in total.

Taking room no.6 from the floor plans as an example, the following spaces are provided:

Living Room: 18.22m²

Kitchen: 6.34m²

Bedroom: 14.25m²

Shower and WC: 5.14m²

In terms of the National Space standards, the overall space for each unit would exceed the minimum required for a 1 bedroom flat. When compared to local space standards, the kitchen, would be undersized. However, this would be marginally undersized; the other rooms proposed would however exceed the minimum guidance, and on balance the undersized kitchens do not justify a reason for refusal.

It is considered that on balance, the submitted plans demonstrate that the flats would provide an appropriate standard of accommodation with acceptable levels of outlook and natural light. The landscaped courtyard would provide an attractive communal environment for residents, supplemented by internal communal facilities. Given the specialist nature of the accommodation, the communal amenity provision is considered appropriate and would provide opportunities for recreation and social interaction.

Environmental Protection has reviewed the submitted Noise Impact Assessment and Air Quality Assessment, which were updated to address impacts of the substation and raises no objection subject to appropriate planning conditions. Subject to the recommended conditions, future occupiers would therefore benefit from an acceptable living environment.

Policy HO9 of the National Planning Policy Framework requires specialist housing for older or disabled people to be delivered to M4(2) or M4(3) accessibility standards. The proposed development deliver all dwellings to M4(2) accessible and adaptable standards. This would ensure that the accommodation is suitably designed to meet the accessibility needs of older residents and would accord with the requirements of Policy HO9. The proposal is therefore considered acceptable in this regard.

Overall, it is considered that the proposal would provide a high standard of residential accommodation for future occupiers and accords with Policy CS19 of the Gravesham Local Plan Core Strategy and Section 12 of the National Planning Policy Framework (2024).

Neighbouring Amenity

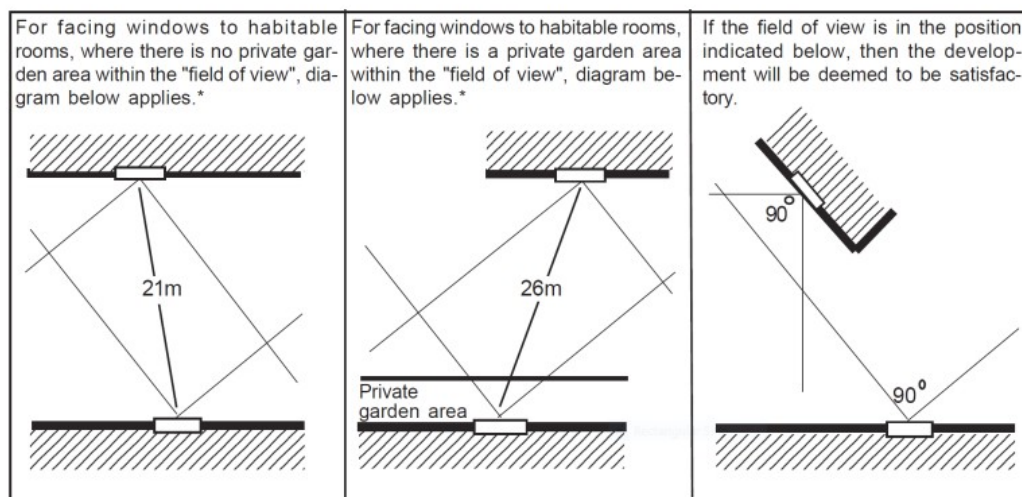
Policy CS19 of the Gravesham Local Plan Core Strategy seeks to ensure that development safeguards the amenity of neighbouring occupiers. National decision-making Policy DP3 requires development to support liveability and respond appropriately to its context, while Policy P3 requires development not to give rise to unacceptable effects on neighbouring residents, including in relation to daylight, sunlight, air, noise, artificial light and other pollution.

The application site occupies a town centre location characterised by a mix of residential, commercial and

community uses, with buildings of varying scale and form. In assessing the proposal, regard has been had to the relationship between the proposed building and surrounding residential properties, with particular regard to privacy, outlook, overbearing impact and disturbance.

The Residential Layout Guidelines detail appropriate privacy distances for dwellings. The impact of the scheme upon the privacy distances of nearby dwellings should be considered. Figure 1 below details the principles upon which the privacy distances will be applied.

Figure 1



The Council's Residential Layout Guidelines identify indicative separation distances between facing habitable-room windows in order to safeguard privacy. The proposal has been assessed against neighbouring residential properties to the east, south and west.

The land to the north is occupied by the Borough Council offices and, as such, the residential privacy separation standards are not directly applicable to that relationship for those within the Council Building. However, potential overlooking of the occupiers of this development from the council building shall be considered. Given the stepped nature of the development the distance between the proposed building and the council officer is between 14.7m and 38.7m. The closest distance therefore warrants particular attention. Windows in the Civic Centre face towards the application site. The ground floor layout would place plant and refuse accommodation towards the northern elevations, but the upper floor plans show flats with habitable room windows on this side. Furthermore, the implemented permission 20220432 established a broadly similar relationship between residential accommodation on this site and the Civic Centre. In addition, the living rooms closest to the Civic Centre that have north facing windows also have a second window on another elevation providing an alternative outlook and allowing occupants to maintain privacy without relying only on the north facing window for daylight. Taking account of that approved position, the intervening public street, the office use and the greater separation across much of the northern elevation, the proposal would provide acceptable privacy for future occupiers.

To the east, the proposed building would be separated from residential development on the opposite side of Windmill Street by approximately 28.3 metres, whilst to the west the separation across Wrotham Road would be approximately 23.4 metres. These relationships provide satisfactory separation between the proposed development and neighbouring residential properties.

To the south, the closest separation would be approximately 15.8 metres. This is below the Council's indicative 21 metre separation distance between directly facing habitable-room windows. However, significant regard is had to the implemented planning permission under reference 20220432, which established a materially similar relationship. In assessing that scheme, the Council recorded distances of 19.6–21.5 metres to properties in Wrotham Road, 27.1–29.9 metres to properties in Windmill Street, approximately 15.9 metres to the flank wall of Cygnet House, and 33.6 metres to residential properties to the south in Zion Place. The previous officer assessment considered those relationships acceptable, noting

that they represented, in most cases, a significant increase in separation compared with historic permitted schemes and the former police station building which previously occupied the site.

The current proposal retains substantially the same siting and a comparable window arrangement to the implemented permission, including an almost identical closest southern relationship, whilst reducing the overall development from five storeys to four storeys and from 75 to 67 apartments. The proposed hedge planting along the southern boundary would provide some screening and visual softening at lower levels, although given the height of the respective buildings it would not materially restrict views between upper-floor windows. The acceptability of the relationship therefore principally derives from the comparable relationship previously assessed and accepted under the implemented permission, together with the fact that the current proposal would represent a reduction in the overall scale of development.

Overall, having regard to the separation distances achieved, the established relationship with surrounding development, the previous assessment of the site and the implemented fallback position, it is not considered that the proposal would result in an unacceptable loss of privacy or outlook, or an overbearing impact upon neighbouring residential occupiers.

The proposal broadly retains the siting and footprint established under the previously approved planning permission, whilst reducing the overall scale of the development from five storeys to four storeys and reducing the number of apartments from 75 to 67. The reduction in height lessens the overall visual impact of the building in terms of bulk and potential overshadowing specifically upon neighbouring occupiers when compared with the approved scheme.

It is considered that the proposed window arrangement would provide appropriate outlook for future residents whilst maintaining acceptable relationships with surrounding properties. Having regard to the town centre context of the site, the relationship with neighbouring development and the reduction in the overall scale of the proposal, it is not considered that the development would result in an unacceptable overbearing impact or unacceptable loss of privacy to neighbouring occupiers.

Environmental Protection has reviewed the submitted Noise Impact Assessment and Air Quality Assessment and raises no objection to the proposal subject to the recommended planning conditions. Subject to those conditions, it is not considered that the development would result in unacceptable noise, air quality or other environmental impacts upon neighbouring occupiers.

The proposal is therefore considered acceptable in neighbouring amenity terms. Accordingly, the proposal is considered to comply with Policy CS19 of the Gravesham Local Plan Core Strategy and national decision-making Policies DP3 and P3 of the National Planning Policy Framework (2026).

Parking and Highways

Policy CS11 of the Gravesham Local Plan Core Strategy seeks to ensure that development provides safe and suitable access for all users, promotes sustainable transport and makes appropriate provision for parking, servicing and accessibility. National decision-making Policy TR4 requires transport considerations to be integral to development design, prioritising walking, wheeling and cycling, meeting the needs of older and disabled people and providing suitable parking having regard to location and connectivity. Policy TR6 requires proportionate assessment of transport impacts and provides that development should be refused where, after mitigation, it would result in a severe adverse impact on the transport network or an unacceptable adverse impact on highway safety.

The proposal would utilise the existing access arrangements and provide associated car parking, accessible parking, cycle parking, mobility scooter storage and servicing facilities appropriate for a specialist retirement living development. The scheme would include 22 vehicular parking spaces and 6 cycle spaces. This is under the standard requirement of 1 vehicular parking space, per 1 bedroom flat and 1 cycle store per dwelling. However, given the nature of the accommodation and the likely reduced mobility of many users of the site given their age it would be reasonable to accept a reduced parking provision.

Particularly in this highly sustainable, town centre location with public transport options nearby.

KCC Highways have raised concerns that the existing lay-by along Wrotham Road would be removed leaving a number of mature trees. They request that the development proposal would widen the existing footway along Wrotham road particularly around the trees.

Kent County Council Highways has reviewed the application and raises no objection in principle to the proposal, subject to the recommended conditions and the resolution of the above matter.

On the matter of the footway, the previous 2022 officer report stated:

The existing parking lay-by on Wrotham Road is to be closed and the footway is to be reinstated so that there will be continuous footway coverage around the perimeter of the site, and this also will need to be secured by a planning condition. Servicing and deliveries will occur within the parking and turning area in the site. Dedicated parking provision for an ambulance / delivery vehicle is not considered necessary.

A condition was included which was as follows:

Within 12 months of the commencement of the development,, and notwithstanding the details as shown in the approved plans and documents, full details shall be submitted for the approval of the Local Planning Authority showing all adjustments to access and dropped kerbs and all footways to be re-instated/re-established around the perimeter of the whole site including to the western side of the site to Wrotham Road, the removal of the parking lay-by and including any level changes and proposals to remove/replace any associated street furniture and signage. The details shall include any new proposed hard surfaces. Such details as may be approved shall be implemented prior to the first occupation of the development hereby permitted, and thereafter permanently retained.

Reason: *In the interests of highway and pedestrian safety and in accordance with Policy CS11: Transport of the adopted Gravesham Local Plan Core Strategy (September 2014) and saved policy T5 (Access to the Identified Highway Network) of the Gravesham Local Plan First Review (November 1994).*

It is considered that a similar approach would be reasonable in this instance to ensure that the footway would provide adequate manoeuvrable space.

Having regard to the submitted information, it is considered that the proposal would not give rise to an unacceptable impact on highway safety or the operation of the local highway network. Appropriate provision is made for parking, servicing and sustainable modes of transport.

Accordingly, the proposal is considered to accord with Policy CS11 of the Gravesham Local Plan Core Strategy together with Policies TR4 and TR6 of the National Planning Policy Framework (2026).

Biodiversity

Ecology

Policy CS12 of the Gravesham Local Plan Core Strategy seeks to conserve and enhance biodiversity and ensure that development does not result in unacceptable harm to ecological interests. National decision-making Policy N2 of the National Planning Policy Framework (2026) requires development proposals to contribute positively to the natural environment and support nature's recovery, including by conserving or enhancing environmental qualities and providing appropriate biodiversity enhancements.

The application has been supported by a Preliminary Ecological Appraisal and associated ecological information. Kent County Council Ecology has reviewed the submitted information and advises that sufficient ecological information has been provided to enable the application to be determined.

The site has been subject to demolition and site clearance undertaken pursuant to the previously

implemented planning permission. Kent County Council Ecology advises that, as a result of the absence of suitable habitat and the extent of the site clearance, the site currently provides limited opportunities for protected species. Nevertheless, habitats within the wider area have the potential to support foraging and commuting bats and, as such, ecological enhancements remain appropriate as part of the proposed development.

KCC Biodiversity recommends conditions requiring the submission of a sensitive lighting strategy to safeguard bats, together with a Landscape and Ecological Management Plan (LEMP) to secure habitat creation, retention and ecological enhancements, including integrated bat and swift bricks. These measures are consistent with Policy N2, which supports measures for species such as bats and swifts, including integrated nesting and roosting features where appropriate. Subject to the recommended conditions, the proposal would conserve and enhance biodiversity and accords with Policy CS12 of the Gravesham Local Plan Core Strategy and Policy N2 of the National Planning Policy Framework (2026).

Biodiversity Net Gain

The application has been supported by a Statutory Biodiversity Metric and associated Biodiversity Net Gain information. Kent County Council Ecology has reviewed the submitted information and advises that sufficient biodiversity net gain information has been provided to determine the application. Furthermore, it confirms that the proposal is subject to the statutory requirement to deliver a minimum 10% Biodiversity Net Gain and advises that there is no local policy requirement exceeding this threshold.

The baseline ecological value of the site is low following demolition and site clearance undertaken pursuant to the previously implemented planning permission. The submitted Biodiversity Metric therefore demonstrates a substantial uplift in biodiversity value through the proposed landscaping and habitat creation measures, reporting an on-site habitat increase of 2716.23%. KCC Biodiversity considers the proposed habitat creation and biodiversity uplift to be achievable and realistic and is satisfied that sufficient information has been submitted to demonstrate that the biodiversity gain hierarchy has been appropriately applied.

Whilst KCC Biodiversity does not consider the on-site biodiversity gain to be significant for the purposes of the statutory Biodiversity Net Gain regime, it recommends that habitat retention, habitat creation and ecological enhancements are secured through a Landscape and Ecological Management Plan to ensure the long-term delivery of the proposed biodiversity measures.

Accordingly, subject to the recommended planning conditions, the proposal is considered to comply with the statutory Biodiversity Net Gain requirements, Policy CS12 of the Gravesham Local Plan Core Strategy and national decision-making Policy N2 of the National Planning Policy Framework (2026).

Thames Estuary and Marshes

The Thames Estuary and Marshes Special Protection Area (SPA) is classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Local Planning Authority has mitigated out the impacts of this in relation to relevant planning

application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £350.16 per additional dwelling), and if appropriate, other mitigation identified through the Habitats Regulations Assessment process. This approach is approved by Natural England for all new residential developments. For every planning application for a new dwelling (including new apartments), the tariff contributions are secured through a Section 106 legal agreement or unilateral undertaking or if there are no other financial contributions this is secured through a contribution agreement.

Where a developer is unwilling to make the SAMMS payment, sufficient evidence is required to be supplied by the applicant to enable the Council to undertake a Habitats Regulations Assessment (HRA). A HRA is a process that determines whether or not development plans could negatively impact local plans on a recognised protected European site beyond reasonable scientific doubt.

The tariff has previously been accepted effectively in lieu of an Appropriate Assessment (AA). However, in a Court of Justice European Union (CJEU) ruling this approach was not considered to be valid, as the CJEU considered the first stage to be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. In this respect, the CJEU judgement made a distinction between “the plan of project itself and measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an Appropriate Assessment and that mitigation measures cannot be taken into account at the screening stage.

The Strategic Access Management and Monitoring Strategy (SAMMS) mitigation contribution via a s.106 agreement would be required to offset any potential recreational impacts, to ensure the scheme is policy compliant and will be incorporated into the planning obligations secured through a legal agreement.

The Local Planning Authority is therefore satisfied that the proposals would put in place adequate measures to mitigate potential significant adverse impacts on the Thames Estuary and Marshes SPA/Ramsar sites and protect their integrity in accordance with their conservation objectives. Subject to securing the SAMMS contribution, the proposal is considered to comply with Policy CS12 of the Gravesham Local Plan Core Strategy, national decision-making Policy N6 of the National Planning Policy Framework (2026), and the Conservation of Habitats and Species Regulations 2017 (as amended). Potential impacts on the European Sites do not therefore impose an impediment to the grant of planning permission in this instance.

Drainage and Flood Risk

Policy CS18 of the Gravesham Local Plan Core Strategy seeks to ensure that development incorporates appropriate drainage infrastructure and sustainable drainage measures.

The application is supported by a revised Flood Risk and Drainage Technical Note, which has been reviewed by the KCC Flood and Water Management raises no objection to the proposed drainage strategy in principle. Surface water is proposed to be managed through a combination of rain gardens, permeable paving, a cellular attenuation tank and water butts, with discharge restricted to 2.1 l/s into the surface water sewer beneath Wrotham Road. The consultee recommends conditions requiring the submission of a detailed sustainable surface water drainage scheme and a verification report to demonstrate that the approved drainage system has been implemented correctly.

Southern Water advises that there is insufficient capacity within the existing surface water network to accommodate unrestricted additional flows from the development and notes that any reinforcement required to the public sewer network would be undertaken by Southern Water. It recommends a condition requiring details of the proposed surface water drainage, discharge rates, volumes and outfall arrangements to be agreed before development commences. Southern Water also confirms that the foul sewerage network has adequate capacity to accommodate the proposed development, provided surface water is not discharged into the foul sewer and the approved drainage hierarchy is followed. Planning conditions can secure appropriate arrangements for the future management and maintenance of the

sustainable drainage system.

Subject to the recommended planning conditions, it is considered that the proposal would provide satisfactory surface water and foul drainage and would not increase flood risk on or off the site. The proposal therefore accords with Policy CS18 of the Gravesham Local Plan Core Strategy and national decision-making Policies F7 and F8 of the National Planning Policy Framework (2026), including the requirement for appropriate sustainable drainage systems and long-term maintenance arrangements.

Trees and Landscaping

Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy seek to protect and enhance green infrastructure and require development to incorporate high quality landscaping that responds positively to its surroundings. National decision-making Policy DP3 requires development to integrate green infrastructure and enhance tree cover where appropriate, while Policy N3 specifically addresses the provision, placement and long-term management of trees in new development.

The application is supported by an Arboricultural Impact Assessment and a detailed Landscape Strategy.

The site has previously been cleared pursuant to the implemented planning permission and does not contain any existing trees within its boundaries. Existing street trees located within the adjacent highway on Windmill Street and Wrotham Road are retained. The submitted Arboricultural Impact Assessment confirms that the proposed development would not require the removal of any existing trees and demonstrates that appropriate tree protection measures can be implemented during construction to safeguard retained trees adjoining the site.

The Landscape Strategy proposes a comprehensive planting scheme comprising new standard and specimen trees, native and ornamental shrub planting, hedgerows, grass, wildflower areas and seasonal planting throughout the site. A substantial landscaped communal garden is provided to the south of the building, with additional planting around the site's perimeter. These measures would soften the appearance of the development, enhance the setting of the building, improve the public realm and contribute positively to biodiversity.

Accordingly, it is considered that the proposal would protect existing trees and provide a high-quality landscape appearance. The proposal therefore accords with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy and national decision-making Policies DP3 and N3 of the National Planning Policy Framework (August 2026).

Affordable Housing

Policy CS16 of the Gravesham Local Plan Core Strategy seeks to secure the provision of affordable housing to meet identified local needs. It requires that on sites of 0.5 hectares or more and for 15 dwellings or more in the urban area that 30% of housing would be affordable.

The proposed development comprises 67 affordable flats, all of which would be owned and managed by Housing 21. The Planning and Housing Statement advises that the Council would receive 100% nomination rights through a nominations agreement and that the development is intended to be delivered with support from the Homes England Affordable Homes Programme. The applicant also advises that the extant planning permission for 75 market retirement apartments was supported by a viability assessment which concluded that the provision of on-site affordable housing was not viable. The current proposal would therefore deliver affordable housing on a site where the extant permission secures no on-site affordable housing.

The provision of 67 affordable apartments for the over 55s would make a substantial contribution towards meeting an identified need for specialist accommodation for older persons within the Borough. Policy HO7 of the NPPF (2026) requires substantial weight to be given to the benefits of homes which contribute towards meeting evidenced accommodation needs, while Policy HO8 supports proposals which meet or exceed up-to-date development plan affordable housing requirements. The affordable housing provision exceeds the requirements of policy, and should be afforded substantial weight in the planning balance,

subject to the provision, nomination rights and occupancy arrangements, including the age restriction of tenants, being secured through a planning obligations Agreement.

Planning Obligations

The Community Infrastructure Levy Regulations 2010, as amended, set out legal tests relating to the use of planning obligations. Regulation 122 states (where there is no CIL charging regime) a planning application may only constitute a reason for granting planning permission for the development if the obligation is:

- i. necessary to make the development acceptable in planning terms;
- ii. directly related to the development: and
- iii. fairly and reasonably related in scale and kind to the development.

National decision-making Policy DM5 of the National Planning Policy Framework (2026) addresses viability assessments and requires them to fully evidence inputs and assumptions, reflect the recommended approach in Planning Practice Guidance and be publicly available. Policy DM6 addresses the use of planning conditions and obligations. The Planning Practice Guidance provides further detail on the assessment of viability and the appropriate evidential approach. The submitted viability material and independent review are considered in this context.

Policies CS10 (Physical and Social Infrastructure) and CS16 (Affordable Housing) of the Local Plan Core Strategy (LPCS) (2014), require development to be supported by relevant infrastructure and to deliver affordable housing, subject to viability considerations. The following financial contributions are requested.

Consultee	Contribution	Amount (£)	Notes / Status
KCC	Community Learning and Skills	£2,292.07	£34.21 per dwelling
KCC	Libraries, Registrations and Archives Services	£4,196.21	£62.63 per dwelling
KCC	Waste Disposal and Recycling	£13,006.71	£194.13 per dwelling
NHS	NHS	£67,725.00	
Natural England	SAMMS	£23,460.70	£350.16 per dwelling
Total		£110,680.69	

Policies CS10 and CS16 of the Gravesham Local Plan Core Strategy require development to be supported by necessary infrastructure and to make appropriate provision for affordable housing, subject to viability considerations. The financial contributions requested by consultees are set out above.

A viability letter was submitted and independently reviewed by Pathfinder. The viability letter essentially advised that the extant permission contained a viability statement which confirmed that, the scheme as proposed then was not viable and therefore could not deliver the financial contributions sought.

Since the grant of that permission, the economic climate in England has seen construction costs rise at a greater pace than house price inflation, with the values of flats not keeping at pace with low density dwellings. The evidence supporting this application therefore concludes that no financial contributions can be made toward infrastructure. The Local Planning Authority commissioned an independent review of this viability evidence from Pathfinder. Pathfinder concludes that a scheme for 67 retirement homes for market sale would not be viable to deliver any financial contributions, thereby agreeing with the applicant's evidence.

It should be noted that the applicant's ability to deliver 67 affordable units in the form of social rent rests with Housing 21 obtaining funding from Homes England; the affordable units are not being delivered as a result of any gains from the sale of market homes on site, as no market homes are now being delivered.

The required SAMMS contribution is, however, necessary to mitigate the recreational impacts of the development upon the Thames Estuary and Marshes SPA/Ramsar site and is required in order for the

development to be acceptable under the Conservation of Habitats and Species Regulations 2017. This contribution would therefore be secured through a planning obligations agreement.

Whilst the inability to secure the full package of infrastructure contributions weighs against the proposal, this matter is considered further within the overall planning balance below.

Conclusion & Planning Balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Paragraph 3 of the National Planning Policy Framework (2026) reiterates this statutory starting point. NDMP Policy S3 establishes the presumption in favour of sustainable development and directs decision-makers to NDMP Policy S4 for proposals within settlements. Under NDMP Policy S4, development proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies in the Framework.

The proposal represents the redevelopment of a sustainable brownfield site within the Gravesend Town Centre Opportunity Area and is considered acceptable in principle. Subject to the recommended planning conditions and completion of a Section 106 Agreement, the proposal is considered acceptable in respect of the detailed matters assessed, including design, heritage, residential amenity, highway safety, ecology, biodiversity, trees and landscaping, archaeology, drainage and flood risk, and would make effective use of previously developed land in a highly sustainable location.

The application is accompanied by a Financial Viability Assessment which has been independently reviewed on behalf of the Local Planning Authority. That review concludes that the development cannot viably support the full policy compliant package of planning obligations requested by consultees. Consequently, the KCC and NHS financial contributions sought would not be secured. This weighs against the proposal despite the independent review of the viability evidence which establishes why the contributions cannot be secured. Moderate weight is therefore given against the inability of this scheme to provide the contributions requested to mitigate additional demand created by the scheme on KCC and NHS services.

Balanced against this, the proposal would deliver 67 apartments for older persons, of which all 67 units would be affordable and delivered as social rented units. This is in comparison to the existing implemented planning permission for 75 market retirement apartments, which secures no on-site affordable housing and limited financial contributions (SAMMS Contribution of £23,460.72). The current proposal would therefore attract substantial weight for delivering new homes in an area with unmet need (NDMP HO7); it would also attract substantial weight for delivering affordable housing and, in particular, social rented units, which would again contribute to meeting an unmet need. The planning obligations agreement would secure the affordable housing provision, appropriate occupancy arrangements, and the required SAMMS mitigation.

Substantial weight is afforded to the redevelopment of this long-vacant brownfield site. NDMP Policy L2 requires substantial weight to be given to the benefits of making better use of vacant and underutilised land, while LPCS Policy TC2 requires substantial weight to be given to relevant benefits of town centre development. The proposal would regenerate a prominent site, make effective use of previously developed land in a highly sustainable location and reduce the scale of the previously approved development whilst retaining the benefits of bringing the site forward for redevelopment.

The proposed development has been designed to reflect the wider character of the area, using a high quality mix of materials and design features, and would cause no harm to the significance of nearby listed buildings or the Upper Windmill Street Conservation Area. The proposal is therefore in accordance with Policies TC2 and TC3 of the Local Plan First Review (1994), Policy CS20 of the Local Plan Core Strategy (2014) and NDMP Policies HE4, HE5, HE6 and HE9 of the National Planning Policy Framework (2026). Furthermore, the development would not result in an overdevelopment of the site or have a detrimental impact on the character, appearance or quality of the area and has an appropriate layout, in accordance with Policy CS19 of the Local Plan Core Strategy (2014) and NDMP Policy DP3 of the National Planning

Policy Framework (2026).

The proposal would safeguard the amenity of neighbouring residents and future occupiers in accordance with Policy CS19 of the Local Plan Core Strategy (2014) and national decision-making Policies DP3 and P3 of the National Planning Policy Framework (2026). As specialist accommodation for older persons, compliance with the M4(2)/M4(3) accessibility requirement in Policy HO9 would be necessary and would be achieved.

The proposal would promote sustainable modes of transport and provide adequate on-site parking to serve the proposed units, having regard to the sustainable town centre location and the specialist nature of the accommodation. The proposal is considered to accord with Gravesham's adopted parking standards (SPG 4) (2006), Policy CS11 of the Local Plan Core Strategy (2014), saved Policies T1 and P3 of the Local Plan First Review (1994) and NDMP Policies TR4 and TR6 of the National Planning Policy Framework (2026).

The development would provide biodiversity net gain and secure ecological habitat and enhancements, subject to the recommended conditions and completion of the Section 106 legal agreement securing SAMMS mitigation. The proposal would therefore comply with the requirements of the Habitats Regulations Assessment, the Environment Act 2021, Section 40 of the Natural Environment and Rural Communities Act 2006, Policy CS12 of the Gravesham Local Plan Core Strategy (2014), and national decision-making NDMP Policies N2 and N6 of the National Planning Policy Framework (2026).

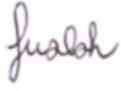
The NDMP policies also identify circumstances in which development should be refused. As assessed above, the proposal would make efficient use of this previously developed town centre site and would achieve an acceptable standard of design having regard to NDMP Policies L3 and DP3. It would not have a severe adverse impact on the transport network or an unacceptable impact on highway safety under NDMP Policy TR6. Significant biodiversity harm that could not be addressed through mitigation has not been identified under NDMP Policy N2, nor would the proposal result in the loss or deterioration of irreplaceable habitat under NDMP Policy N6(2). Subject to securing SAMMS mitigation through the Section 106 agreement. The identified grounds for refusal in these policies therefore do not apply.

Applying NDMP Policy S4, the proposal attracts substantial positive weight through the delivery of 67 affordable specialist homes for older persons (NDMP Policy HO7), the beneficial reuse of a vacant brownfield site (NDMP Policy L2), and the regeneration and residential use of a sustainable town centre site (NDMP Policy TC2). The inability, on viability grounds, to secure the full package of planning obligations requested by consultees weighs against the proposal. However, subject to completion of a planning obligations agreement securing the affordable housing arrangements and SAMMS mitigation, the recommended planning conditions, and compliance with the accessibility requirement in Policy HO9, the identified adverse effects do not substantially outweigh the benefits of granting permission. The proposal therefore accords with the Development Plan when read as a whole and is supported by the national decision-making policies in the National Planning Policy Framework (2026).

Recommendation

Planning permission is therefore recommended, subject to the completion of a Section 106 Agreement and the conditions set out in the recommendation.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	1 st October 2026	Dated:	05 October 2026

