



Planning Statement

Samra Property SE LTD

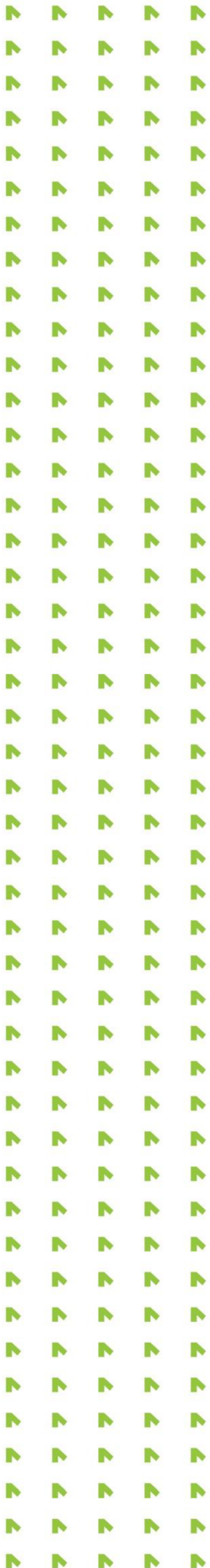
No 1 Russell Road, Gravesend

DA12 2RT

Regulated by RTP1

May 2024

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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Samra Property SE Ltd in support of a full planning application for the demolition of an existing detached dwelling (No 1 Russell Road, Gravesend DA12 2RT) and the subsequent construction of a new two storey block with habitable roof space comprising of 1 x 3b/5p house, 3 x 1b/1p studio apartments and 3 x 1b/2p apartments with associated access, private and communal amenity space, refuse and cycle storage.
- 1.2 The Statement addresses the following matters:
- A description of the site and surroundings;
 - A review of the background and history of the site;
 - A summary of the development proposal;
 - An assessment of relevant planning policy;
 - An appraisal of the relevant planning and design issues; and
 - Conclusions.
- 1.3 The Statement should also be read in conjunction with the following documentation submitted in support of the application:
- Drawings Package (prepared by Sub Rosa Architecture);
 - Design & Access Statement (prepared by Sub Rosa Architecture);
 - Transport Statement (prepared by Axis), and
 - Sunlight and Daylight Assessment (prepared by T16).
- 1.4 The submissions conclude that the revised development proposal is fully acceptable and supportable in planning terms.

2 SITE AND SURROUNDINGS

- 2.1 The site comprises a detached bungalow which is positioned on the corner of Russell Road and Albion Terrace. The western side elevation of the property adjoins No 25 Albion Terrace which in turn forms part of a terrace of two storey dwellings fronting onto Albion Terrace to the west.
- 2.2 The main elevation of the property faces onto Russell Road. The rear (north) of the site accommodates a detached garage which is served by a single width vehicular access. Beyond the northern boundary of the site lies the side elevation of No 17 Russell Road, which forms part of a terrace of two storey dwellings that gradually descend in height along the road.
- 2.3 On the opposite side of Russell Road to the east of the site lie the front elevations of a terrace of two storey residential properties that are positioned approximately 16 metres away.
- 2.4 Given the general character and built form of the immediate surrounding area (along Albion Terrace and Russell Road) the site represents a somewhat incongruous feature which does not contribute in a particularly positive manner to the visual appearance of the streetscene.
- 2.5 Furthermore, the existing property extends considerably beyond the rear elevation of No 25 Albion Terrace at ground floor level given its orientation.
- 2.6 Within the wider context there are other buildings of relevance to the site including the three storey residential building 'Broadwater House' that is approximately 30 metres west of the site along Albion Terrace and the three storey residential building 'Amber Court' which is approximately 45 metres to the east along Norfolk Road.
- 2.7 Broadwater House is arranged into a C-shape building with the principal elevation fronting onto Albion Terrace. It features habitable windows within all elevations and maintains a separation distance of approximately 15 metres with the properties positioned opposite to the north, east, and west.
- 2.8 Meanwhile, Amber Court to the east is arranged in an 'V' shape formation and accommodates 10 flats. Importantly, Amber Court uses the space at its rear to provide parking and a separate private garden for one of the ground floor flats. The site maintains separation distances of approximately 11 and 12 metres to habitable room windows on neighbouring residential properties to the north and west respectively.
- 2.9 Accordingly, the wider surrounding area is also predominantly residential in character and includes several apartment buildings ranging between 3-5 storeys alongside the two storey terraced homes immediately local to the site as explored above. There is a general consistency in scale of three stories within the terrace block on the northern side of Russell Road, with the majority of buildings having been constructed in the 1970's.
- 2.10 With regard to amenities, Gravesend Town Centre lies less than 750 metres from the site and provides a diverse retail offer with a range of local shops and services including a supermarket, bank, pharmacy and a range of restaurants and bars all within easy reach. Within 500 metres are multiple sports clubs providing opportunity for physical and social activities.

- 2.11 Furthermore, approximately 200 metres away from the site lies the Riverside leisure area and Gordon Promenade offering considerable quality green space for the benefit of nearby residents. This park is classified locally as the premier greenspace within Gravesend.
- 2.12 It is confirmed that the site is not within a Conservation Area but is near to the Riverside Conservation Area. This Conservation Area does not relate to the built environment, rather the marina and greenspace surrounding it. There aren't any listed buildings situated in the immediate proximity. The site is acknowledged to lie within Flood Zone 1.
- 2.13 Please refer to the selection of site photos and images below and overleaf.

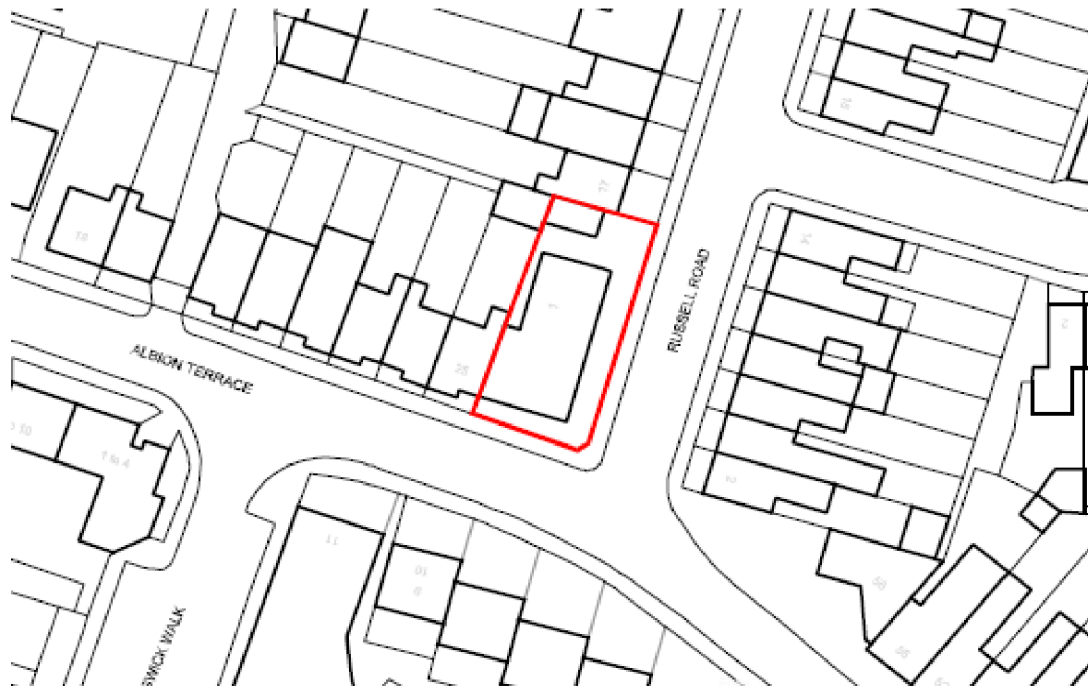


Image 1: Site Location Plan



Image 2: Photo of east elevation of site from Russell Road



Image 3: Photo of eastern and southern elevations of site as seen from corner of Russell Road and Albion Terrace. This image demonstrates how the existing property does not relate to the height/scale of the neighboring terraces.



Image 4: Photo of north and west (rear) elevations of property from northwestern corner of site demonstrating the hardstanding nature of the existing residential curtilage.



Image 5: Photo of front elevation of existing property facing Russell Road



Image 6: Photo of existing western boundary with rear elevation of No 25 Albion Terrace visible in background



Image 7: Street view taken from corner of Albion Terrace and Brunswick Walk. This demonstrates the incongruous nature of the existing site when viewed in the context of the immediate surroundings.



Image 8: Streetview of site from Russell Road facing north.



Image 9: Streetview of site from Norfolk Road facing west. This demonstrates the incongruous nature of the existing site.



Image 10: Streetview image of the three storey Amber Court development from Albion Terrace/Norfolk Road.



Image 11: Streetview of the three storey Broadwater House from Albion Terrace.

3 PLANNING HISTORY

- 3.1 The site has been subject to several historical applications, albeit these relate to the extension of the existing property and are of no relevance to the determination of the application proposal.

4 THE PROPOSAL

- 4.1 The accompanying Design and Access Statement sets out the design principles and concepts that have been applied to the development. However, the key elements are summarised below.
- 4.2 Full planning permission is sought for the demolition of an existing detached dwelling (No 1 Russell Road, Gravesend DA12 2RT) and the subsequent construction of a new two storey block (including habitable roof space) comprising of 1 x 3b/5p house, 3 x 1b/1p studio apartments and 3 x 1b/2p apartments with associated access, private and communal amenity space, refuse and cycle storage.
- 4.3 Please refer to the schedule of accommodation (including breakdown of internal floorspace and amenity provision) below.

Flat Number	National Space Standard Requirement	Gross Internal Area	Private Amenity Provision	Outlook
House 1 (3B/5P)	99 sqm	110 sqm	Private garden	Dual
Flat 1 (1B/1P)	37 sqm	38.5 sqm	Shared garden	Dual
Flat 2 (1B/2P)	50 sqm	54 sqm	Shared garden	Dual
Flat 3 (1B/1P)	37 sqm	38.5 sqm	Shared garden	Dual
Flat 4 (1B/2P)	50 sqm	50 sqm	Shared garden	Dual
Flat 5 (1B/1P)	37 sqm	38.5 sqm	Shared garden	Dual
Flat 6 (1B/2P)	50 sqm	50 sqm	Shared garden	Dual

Design Approach

- 4.4 As outlined within Section 2, the immediate street scene is predominantly characterised by purpose-built residential apartment blocks of varying scale and external design. The existing dwelling does not hold any significant architectural merit and there is no objection to its demolition in principle, particularly as all other buildings within the local area are of noticeably larger scale.
- 4.5 The site is not located within a Conservation Area, albeit careful consideration has been afforded to ensure that all elements of the proposal respond positively to local distinctiveness and sit comfortably in terms of visual appearance and massing within the streetscene, whilst delivering a high quality contemporary design.
- 4.6 The scheme has been arranged in an efficient manner that will ensure the full potential of this highly sustainable site is realised. The development has been carefully considered to reflect the scale,

density and character of properties within the surrounding context which feature a number of apartment buildings (please refer to images within Section 2 of Amber Court and Broadwater House).

- 4.7 The general height and scale proposed block responds positively to the neighbouring terrace of residential dwellings fronting onto Albion Terrace. As explained within the 'Design Evolution' section of the Design and Access Statement, the elevations of the proposed building are split into narrower widths to harmonise with the proportions of the neighbouring terraced dwellings.
- 4.8 Furthermore, the proposed roofline reduces in height along Russell Road to the north in line with the existing topography of the road and to reference the stepped height of the terraces facing Russell Road.
- 4.9 The rooflines will be recessed and clad in slate to help achieve a high quality, contemporary external appearance. Furthermore, as demonstrated on the drawings package the eaves will be demarcated and dormers added to help articulate the roof form.
- 4.10 At ground floor level, recessed bays are introduced to emphasise the building entrances and to respond positively to the external detailing of terraced houses along Russell Road and Albion Terrace.
- 4.10 To complete the high quality, contemporary approach, the external elevations will incorporate varied external brickwork to add a degree of fragmentation, whilst chimneys are added to introduce visual interest and to augment the roofline. Large windows are also integrated within the main elevations to help create a light, bright internal living environment for occupiers.
- 4.11 Whilst the new buildings on site will add additional height and massing compared to the existing dwelling, the carefully considered layout and retained separation distances (which reflect those present between existing properties within the immediate surrounding context) are sufficient to avoid any unacceptable harmful overlooking or overbearing impacts.
- 4.12 The carefully considered layout of the scheme ensures that a private rear garden will be provided for occupiers of the proposed 3 bed family home positioned adjacent to No 25 Albion Terrace. The proposed building will achieve a reduction in its rear (northern) projection when compared to the existing dwelling, which improves the relationship between the site and the rear elevation windows of No 25.
- 4.13 This approach also creates space within the rear part of the site to accommodate secure and accessible cycle and refuse storage, together with two off road car parking spaces and communal amenity space to be shared by occupiers of the proposed apartments.
- 4.14 The street facing elevations of the new building will also be set back approximately 1.5 metres from Albion Terrace and 1 to 1.5 metres from Russell Road to respond positively to the existing building lines in place along these streets.
- 4.15 Overall, the considered design approach enables the creation of a high quality contemporary scheme that will enable the site to respond in a positive manner to the immediate surrounding area whilst providing new residential accommodation for members of the local community within a highly sustainable location.

5 PLANNING POLICY

5.1 This section provides a review of relevant national and local planning policy and guidance.

NATIONAL POLICY

5.2 The National Planning Policy Framework (NPPF) was revised in December 2023 and sets out the Government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development.

5.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental net gains should be pursued in mutually supportive ways through the planning system.

5.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework.

Delivering a Sufficient Supply of Homes

5.6 Paragraph 60 explains that in order to support the Government's commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

5.7 Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where strategic policies are more than five years old. The five year supply should include an appropriate buffer. Where the local authority chooses to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan the buffer should be 10% to account for any fluctuations in the market during that year. In the event that there has been significant under delivery when measures against the Housing Delivery Test (November 2018 onwards) then a 20% buffer should be applied.

5.8 The NPPF is clear at paragraph 11 that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.

Promoting Sustainable Transport

- 5.9 To protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities; address the needs of people with disabilities by all modes of transport; create safe and secure places minimising conflicts between traffic and pedestrians; allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Making Effective Use of Land

- 5.10 The NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 5.11 Paragraph 124 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs. Furthermore, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 5.12 Sub Section (e) of paragraph 124 outlines that Council's should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.
- 5.13 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 128 sets out that the planning system should support development that makes efficient use of land, taking into account the following:
- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) Local market conditions and viability;
 - c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) The desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) The importance of securing well-designed and beautiful, attractive and healthy places.

Achieving Well Designed Places

- 5.14 This chapter sets out at paragraph 135 that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks, and
- Create places that are safe, inclusive and accessible and which promote health and well-being.

Decision Taking

- 5.15 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

DEVELOPMENT PLAN

- 5.16 The Development Plan consists of the Gravesham Local Plan Core Strategy (2014), a number of saved policies within the Gravesham Local Plan First review (1994) and a range of Supplementary Planning Guidance notes.
- 5.17 Accordingly, the combined Core Strategy and saved elements of the Local Plan set out the overall policies for consideration of planning applications within the borough, with additional detailed guidance provided within the relevant SPG's. The policies relevant to the assessment of the development proposal are summarised below.

Core Strategy (2014)

- 5.18 **Policy CS01 (Sustainable Development)** Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.
- 5.19 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

- 5.20 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - Specific policies in that Framework indicate that development should be restricted.
- 5.21 **Policy CS02 (Scale and Distribution of Development)** The development strategy for the Borough is to retain and improve the existing stock of housing and suitable employment land and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028, and at least 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) during the plan period.
- 5.22 Development will be distributed throughout the Borough as follows: around 3,890 new dwellings and around 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East; Gravesend Riverside East and North East Gravesend; Ebbsfleet (Gravesham) and Gravesend Town Centre and on land at the Coldharbour Road Key Site; around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt.
- 5.23 The strategy prioritises development in the urban area as a sustainable location for development. This will be achieved by:
- Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and Northeast Gravesend to create new residential neighbourhoods and employment areas;
 - The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;
 - Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and
 - Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including Land at Coldharbour Road Key Site.
- 5.24 **Policy CS11 (Transport)** States that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with

national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

- 5.25 Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities. The Council will support proposals which improve public transport provision and facilities in the Borough. In particular, it will:
- Seek to maintain and expand, where justified, segregation lanes for Fastrack and existing bus priority measures elsewhere;
 - Require key sites to include provision for buses;
 - Support the development of transport hubs at Gravesend Town Centre and Ebbsfleet (in Dartford Borough Council area) to provide high quality interchange facilities between bus, rail, walking and cycling; and
 - Ensure an adequate supply of public car parking.
- 5.26 The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate. These should provide improved access to Gravesend Town Centre and Ebbsfleet and to other services and facilities in the Borough. In particular, the Council will seek the provision of pedestrian and cycle links between Northfleet and Ebbsfleet stations and along the River Thames, a part of the proposed Thames Estuary Path.
- 5.27 **Policy CS14 (Housing Type and Size)** States that the Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties.
- 5.28 The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.
- 5.29 **Policy CS15 (Housing Density)** Outlines that sites will be delivered at a variety of densities, depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.
- 5.30 All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration:
- Within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport hubs of Gravesend Town Centre and Ebbsfleet, higher densities will be sought;
 - In the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare

- 5.31 Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.
- 5.32 **Policy CS16 (Affordable Housing)** Confirms that the provision of affordable housing will be required on all new housing developments of: 15 dwellings or more on sites of 0.5 hectares or more in the urban area; and 3 units or more on sites of 0.1 hectares or more in the rural area.
- 5.33 **Policy CS19 (Development and Design Principles)** States that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:
- Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;
 - New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;
 - New development will be located, designed and constructed to:
 - i. Safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
 - ii. Avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
 - iii. Not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
 - The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
 - New development will be designed in an inclusive way to be accessible to all members of the community;
 - New development will provide appropriate levels of private and public amenity space;

- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- Car parking will be well related to the development it serves;
- New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste; and
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

5.34 **Policy CS20 (Heritage and the Historic Environment)** States that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a no-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

5.35 Proposals and initiatives will be supported which preserve and where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include:

- Gravesend Town Centre, its development as a heritage riverside town, and its setting;
- The Borough's urban and rural Conservation Areas; and
- Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.

5.36 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Gravesham Local Plan First Review (1994)

- 5.37 **Policy LT6 (Additional Open Space in New Housing Development)** advises that proposals for new housing development will be expected to make provision for open space and play space appropriate to the scale of development and type of housing proposed, having regard to the provision of and proximity to existing open space in the locality.
- 5.38 **Policy T1 (Impact of Development on Highway Network)** confirms that Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.
- 5.39 **Policy T2 (Impact of Development on Highway Network)** states that the Local Planning and Highway Authorities will seek to channel all traffic travelling through Gravesham on to the primary road network and to channel traffic between and within residential, industrial and principal business districts of the Borough onto the district distributors.
- 5.40 **Policy P3 (Vehicle Parking Standards)** confirms that the Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates.

Supplementary Planning Guidance

- 5.41 **Supplementary Planning Guidance 2 (Residential Layout Guidelines)** states that with regard to privacy distances and overshadowing a minimum distance of 21 metres shall be provided between the windows of habitable windows and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling.
- 5.42 Where windows of habitable rooms face each other, a window-to-window distance of at least 21 metres should be provided. Habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms.
- 5.43 For “single aspect” dwellings, the minimum distance from the window of a habitable room to any house wall of equivalent height containing no habitable room can be reduced to 11 metres.
- 5.44 To protect against overshadowing and loss of light, all applications for residential development will be expected to comply with the 25 degree rule. i.e. the development proposal should not obstruct a 25 degree line as measured from the centre point of the lowest window.
- 5.45 When considering amenity provision for self-contained flatted units, the SPG states, those [units] which have two or more bedrooms and are capable of providing family accommodation will be expected to provide an area of amenity space in excess of 10 sqm. For accommodation with 3

bedrooms a garden space of a minimum 60 square metres will be required. Such amenity space shall be of sufficient size to accommodate the following:

- Children's play space;
- Drying area;
- Limited outside storage;
- Sitting out; and
- General leisure use.

5.46 Finally, refuse containers shall be provided on a hardstanding and within purpose built enclosures, which are readily accessible for collection.

6 PLANNING CONSIDERATIONS

- 6.1 The planning issues relevant to the determination of the development proposal are assessed in detail below.

Principle of Development

- 6.2 As examined within the previous section, the National Planning Policy Framework (NPPF) requires the Council to make the most efficient use of land by maximising the use of previously developed sites.
- 6.3 The site comprises an existing residential site positioned within a sustainable location in the urban area which benefits from excellent access to a range of local shops, services, local parks as well as connecting bus and rail links.
- 6.4 The existing dwelling makes a negative contribution towards the visual character of the streetscene due to it being the only dwelling of that layout and type within the immediate vicinity. As such, it offers an opportunity for redevelopment that will result in a more efficient use of the site.
- 6.5 The scheme will bring forward a range of new residential accommodation (including a replacement family sized dwelling) that will make a positive contribution toward the borough's housing requirements and provide living opportunities for members of the local community.
- 6.6 This is particularly pertinent when considered in the context of the Council's inability to demonstrate a Five Year Housing Land Supply (FYHLS). The latest agreed position (as of March 2023) is that the Council can only demonstrate 2.90 years supply, which represents a very significant shortfall.
- 6.7 The presumption in favour of sustainable development will therefore apply to the assessment of this application. In this instance, the policies which are most important for determining the application are considered out-of-date and the Council should therefore grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole.
- 6.8 Accordingly, the principle of new residential development is considered acceptable at this location in accordance with Policies CS01, CS02, CS14 and CS15 of the Local Plan, provided that relevant design and living environment criteria, refuse, biodiversity and parking standards are all adhered to. Furthermore, it would need to be demonstrated that there would be no adverse impact upon the amenity of the occupiers of any neighbouring dwellings.

Design

- 6.9 As outlined within Section 2, the immediate street scene is predominantly characterised by purpose-built residential apartment blocks of varying scale and external design. The existing dwelling does not hold any significant architectural merit and there is no objection to its demolition in principle, particularly as all other buildings within the local area are of noticeably larger scale.
- 6.10 The site is not located within a Conservation Area, albeit careful consideration has been afforded to ensure that all elements of the proposal respond positively to local distinctiveness and sit comfortably in terms of visual appearance and massing within the streetscene, whilst delivering a high quality contemporary design.

- 6.11 The scheme has been arranged in an efficient manner that will ensure the full potential of this highly sustainable site is realised. The development has been carefully considered to reflect the scale, density and character of properties within the surrounding context which feature a number of apartment buildings (please refer to images within Section 2 of Amber Court and Broadwater House).
- 6.12 The general height and scale proposed block responds positively to the neighbouring terrace of residential dwellings fronting onto Albion Terrace. As explained within the Design Evolution section of the Design and Access Statement, the elevations of the proposed building are split into narrower widths to harmonise with the proportions of the neighbouring terraced dwellings.
- 6.13 Furthermore, the proposed roofline reduces in height along Russell Road to the north in line with the existing topography of the road and to reference the stepped height of the terraces facing Russell Road.
- 6.14 The rooflines will be recessed and clad in slate to help achieve a high quality, contemporary external appearance. Furthermore, as demonstrated on the drawings package the eaves will be demarcated and dormers added to help articulate the roof form.
- 6.15 At ground floor level, recessed bays are introduced to emphasise the building entrances and to respond positively to the external detailing of terraced houses along Russell Road and Albion Terrace.
- 6.16 To complete the high quality, contemporary approach, the external elevations will incorporate varied external brickwork to add a degree of fragmentation, whilst chimneys are added to introduce visual interest and to augment the roofline. Large windows are also integrated within the main elevations to help create a light, bright internal living environment for occupiers. Please refer to the CGI below.



Image 12 – CGI of proposed scheme taken from corner of Russell Road and Albion Terrace. This angle demonstrates how the proposed development will respond positively to the scale and appearance of neighbouring properties. Its high quality, contemporary nature will enable the site to respond more positively to the visual character of the streetscene.

- 6.17 Overall, the considered design approach enables the creation of a high quality contemporary scheme that will enable the site to respond in a positive manner to the immediate surrounding area. It accords with design based guidance set out within the NPPF as well as Policies CS01 and CS19 of the Core Strategy.

Impact

- 6.18 Whilst the new buildings on site will add additional height and massing compared to the existing dwelling, the carefully considered layout and retained separation distances (which reflect those present between existing properties within the immediate surrounding context) are sufficient to avoid any unacceptable harmful overlooking or overbearing impacts.
- 6.19 One of the key characteristics of the immediate local area surrounding the site is its dense urban form, which reflects its accessible location in close proximity to the town centre. Accordingly, there are many examples of separation distances between habitable room windows which fall short of the 21 metre target set out within the SPG.
- 6.20 As summarised within Section 2, Broadwater House maintains a separation distance of approximately 15 metres to the neighbouring positioned opposite to the north, east, and west.
- 6.21 Furthermore, Amber Court retains separation distances of approximately 11 and 12 metres to habitable room windows on neighbouring residential properties to the north and west respectively.
- 6.22 Separation distances between residential properties situated on opposing sides of Albion Terrace in close proximity to the site vary between 14 and 17 metres, with average separations of circa 17 metres between two and three storey dwellings to the east and west of Russell Road. Along Norfolk Road to the east of the site, the separation distances between the two storey terraces which face each other extend to below 14 metres.
- 6.23 The proposed southern street facing elevation will contain habitable room windows at upper floor level. These will be positioned a minimum of 19 metres (rising to 21 metres) from facing upper floor habitable room windows on the front elevations of residential properties positioned on the opposite side of Albion Terrace.
- 6.24 This responds positively to the recommended separation distance of 21 metres set out within the SPG guidance and reflects the existing relationship between the existing residential dwellings positioned along this road.
- 6.25 The proposed eastern elevation will also include eight habitable room windows included at upper floor levels which will maintain separation distances ranging between 14.5 metres and 15.5 metres to facing windows on the western side of Russell Road. However, it is pertinent to note that five of the eight windows on each floor serve either internal circulation or kitchen space, which the SPG confirms do not represent habitable windows (and therefore do not need to seek to adhere to the target 21 metre separation).
- 6.26 Furthermore, the retained separation distances of 14.5 and 15.5 metres reflect the existing dense urban form typology of the immediate local area and are greater than numerous examples within the surrounding streetscene as referred to above.

- 6.27 Accordingly, whilst the separation distances fall marginally short of the target 21 metre standard enshrined within the SPG, our view is that the privacy of residents will still be protected to an acceptable degree when considered in the context of the dense urban form of the area and the relationship between existing residential properties. The position of the road (either Russell Road to the east or Albion terrace to the south) also enhance the sense of separation between the site and existing neighbouring properties.
- 6.28 Ultimately, the 21 metre separation distance is a target standard which applies in the first instance to new residential developments such as housing schemes which are likely to be constructed on land which that will have less constraints than the application site. Our view is that a degree of flexibility should be factored in to the application of these target standards for sites situated within accessible, dense urban areas where there is a far greater range of constraints (including the position of existing residential properties).
- 6.29 To rigidly apply the 21 metre separation distance target to all sites would result sustainable residential development from being brought forward on suitable sites at appropriate densities, thereby conflicting with guidance enshrined within the NPPF. It is therefore appropriate for the Council to adopt a balanced approach in determining the application, taking into account the wider benefits of the scheme.
- 6.30 As demonstrated on site layout plan, the proposed building will achieve a reduction in its rear (northern) projection when compared to the existing dwelling, which enhances the relationship between the site and the rear elevation windows of No 25 Albion Terrace. Furthermore, there will be no windows facing No 25 or providing direct views into the rear garden of No 17 Russell Road to the north, meaning that there will be no adverse overlooking or overbearing impact upon either of these properties.
- 6.31 One of the key drivers behind the scale and form of the proposed development is to ensure that there will be no adverse impact upon the amenity of any neighbouring residents. With this in mind, the application submission is supported by a Sunlight & Daylight Assessment prepared by T16.
- 6.32 The Assessment concludes that the proposed scheme meets all relevant BRE targets and will not result in any harmful impact upon the windows or gardens of any immediate neighbouring properties.
- 6.33 On the basis of this assessment, the proposed development has been demonstrated to respect the amenity of neighbouring occupiers in line with the requirements of Policy CS19 of the Core Strategy.

Living Conditions

- 6.34 All internal rooms will meet and/or exceed targets set out within the National Space Standards. Provision will also be made within the site for secure cycle accommodation and refuse storage as explored in further detail in the subsequent section.
- 6.35 The scheme has been carefully designed to ensure that suitable private amenity areas will be provided for new residents which respond positively to relevant target standards.

- 6.36 A private rear garden extending to 60 sqm will be provided for occupiers of the proposed 3 bed family home positioned adjacent to No 25 Albion Terrace, which accords with the target standard set out within the SPG.
- 6.37 Furthermore, a separate shared amenity area will be provided for occupiers of the apartments extending to 25 sqm (which comfortably exceeds the 10 sqm target for flatted development set out within the SPG).
- 6.38 This layout ensures that all residents will have access to acceptable private and shared amenity space. Furthermore, it is pertinent to note the proximity of the site (circa 200 metres) from the Riverside Leisure Area and Gordon Promenade to the north west. This represents the premier greenspace within Gravesend and will also provide excellent amenity provision for future occupiers.
- 6.39 The new building also seeks to maximise opportunities for glazing within the front, rear and side elevations, with all habitable rooms being served by at least one window to provide high quality outlook and light, bright internal spaces for occupiers.
- 6.40 The proposed scheme is therefore compliant with Policy CS19 of the Local Plan.

Parking/Cycle/Refuse

- 6.41 This application is supported by a Transport Statement completed by Axis. The Statement goes on to say how the site is well located to facilitate journeys to be made to / from the site by sustainable travel modes, being within walking distance of a number of amenities, within cycling distance of various settlements and having good access to bus and train services.
- 6.42 Access is proposed to be taken off Russell Road by widening the existing dropped kerb arrangement at the north-eastern corner of the site.
- 6.43 The proposal comprises 2 off-street parking spaces, which will be allocated to the 3- bedroom dwelling. No off-street parking is proposed for the 6No. 1-bedroom dwellings. However, the report has demonstrated, through parking beat surveys, that there is sufficient on-street parking capacity within the local PPA Zone TC01 to accommodate the anticipated parking demand associated with these dwellings.
- 6.44 Cycle parking will be provided in accordance with KCC's minimum cycle parking standards, as set out in SPG4 (June 2006). Refuse collection will be undertaken directly from Russell Road in accordance with the servicing arrangements of the existing site and nearby properties.
- 6.45 The proposed development is forecast to generate a total of 5 two-way vehicle trips in the AM peak hour and 4 two-way trips in the PM peak hour, on average. This equates to an average of just 1 two-way movement every 12-15 minutes during the busiest hours. It is considered that this level of trip generation is negligible and would not cause detriment to the safety or operation of the local highway network.
- 6.46 On the basis of this assessment, the proposal represents an appropriate use of the site and will have no detrimental material impact on the surrounding transport network in accordance with Policies T1, T2 and P3 of the Local Plan. The proposal is also shown to be in accordance with the residential layout guidelines for Gravesham.

- 6.47 Paragraph 115 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Against this background, there is no reason to refuse the scheme on highways grounds.

7 CONCLUSIONS

7.1 It is concluded that the proposal is in accordance with the NPPF and the Council's adopted Development Plan. It therefore constitutes appropriate development and should be supported for the following reasons:

- The principle of creating new residential dwellings on an existing residential site in an accessible location within the urban area, is supported by national and local policy. The proposed scheme will provide much needed new housing for the local community (including family sized accommodation) whilst enabling an efficient, effective use of the site. This is particularly pertinent when considered in the context of the Council's inability to demonstrate a Five Year Housing Land Supply;
- The scheme proposes a high quality contemporary design solution. It will respond in a positive manner to the visual character and appearance of the streetscene and the general pattern of development within the local area;
- The layout of the scheme together with the orientation of windows and retained separation distances in the context of the dense urban typology of the local area ensures there will be no unacceptable adverse impact upon the amenity of occupiers of any neighbouring properties;
- The proposed accommodation is fully acceptable and of a high standard. Each new apartment will exceed internal space standards and generous amenity space (both private and communal) will be provided for all occupiers, and
- The application submission is supported by a comprehensive range of specialist consultant reports including a Design & Access Statement, Transport Statement and Sunlight & Daylight Assessment. The submissions conclude that the revised scheme is acceptable in regard to key relevant planning, design, amenity and highways issues.

7.2 Overall, the scheme adopts the principles of sustainable development in relation to social, economic and environmental factors. This is because it recycles urban land and delivers a mix of residential dwellings which are accessible by a choice of travel modes including foot, cycle and public transport. The proposals thereby accord with the emphasis of national policy (set out within the NPPF), which confirms a presumption in favour of sustainable development.

7.3 In light of the above, the revised scheme has been demonstrated to comply with all relevant planning policies of the NPPF and adopted Local Plan (most notably CS01, CS02, CS11, CS14, CS15, CS16, CS19, CS20, LT6, T1, T2 and P3) and should be considered acceptable.

