

S.73 Planning Statement

Former Gravesend and North Kent Hospital
(M Block)
Clifton Road,
Gravesend,
Kent

Strawberry Star SL1 Limited

August 2022

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Table of Contents

EXECUTIVE SUMMARY	4
1 INTRODUCTION	5
2 RELEVANT PLANNING HISTORY	7
3 AMENDMENTS	11
4 AMENDMENT OF WORDING AND PLANNING CONDITIONS	16
5 PLANNING POLICY	18
6 PLANNING CONSIDERATIONS	22
7 THE TILTED BALANCE	26
8 CONCLUSIONS	27

List of Tables

TABLE 1: APPROVED UNIT MIX OF THE OVERALL SCHEME	9
TABLE 2: APPROVED UNIT MIX OF BLOCK M	9
TABLE 3: DOCUMENTS LISTED ON THE DECISION NOTICE DATED 17TH FEBRUARY 2022	9
TABLE 1: MIX – APPROVED AND PROPOSED OVERALL	13
TABLE 2: COMPARISON OF CONSENTED AND PROPOSED UNIT TYPES IN BLOCK M	13
TABLE 3: CONSENTED AND PROPOSED UNIT MIX BLOCK M	23
TABLE 4: PROPOSAL COMPARED WITH NATIONALLY DESCRIBED SPACE STANDARDS	24

Appendices

APPENDIX A: DECISION NOTICE REF. 20190504 AND 20220487	28
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Executive Summary

The following Planning Statement details the proposed minor material amendments to extant planning application (ref. 20190504) at the Block M Former Gravesend Hospital Site. Following the grant of permission, the Applicant, Strawberry Star SL1 Limited, purchased the Site from Peker Holdings Ltd. Following their acquisition of the Site, the Applicant is now seeking to amend the extant permission to deliver an improved scheme.

The approved scheme comprises two elements, a conversion of the existing building and a new building development on the remainder of the Site. The minor amendments proposed focus on the conversion element of the Site. The proposed amendments seek to improve the overall deliverability of the scheme whilst working within the constraints of the existing structure. These amendments were developed following receipt of additional information related to the existing structure. With this new information, the proposal seeks to amend the internal layout of the conversion building; propose a minor increase in height; reduce the number of homes in this building by 2; provide enhanced internal and external communal amenity space for future residents. These amendments see Block M go from 63 units to housing 61 units.

With buildability and performance front of mind changes to the external design are proposed. Where the consented scheme proposes inset balconies, the scheme now seeks to retain the strong horizontal lines of the existing building while adding projecting balconies. This change provides multiple benefits to the scheme, such as removing thermal bridging issues; retaining the character of the existing building, providing a more residential feel to the scheme all while enhancing the overall buildability of the Site.

The existing building has a strong character, with the distinct shape of the M&E tower presenting a memorable form on the skyline. The proposal seeks to retain this form, while modernising the space to provide high quality amenity space which provides vista views across Gravesham and the Thames towards London. This amendment creates a statement space while benefiting all of the scheme's residents through the improved quality of the space and the amenity this area offers.

This proposal is being prepared in the context of the climate crisis and at a time where the need to shift to sustainable modes of transport is at an all-time high. With this context in mind, in combination with the Site's highly sustainable location, the proposal seeks to reduce dependence on private cars and encourage modal shift. With this goal in mind, the proposal provides a modest reduction in parking in the under-croft area while improving facilities such as an enhanced bike store and electric vehicle charging.

Overall, the proposed amendments detailed in this statement seek to improve future occupier experience and overall deliverability of an overall improved scheme.

1 Introduction

1.1 This S.73 Planning Statement has been prepared by Newsteer Real Estate Advisers ('Newsteer') on behalf of Strawberry Star SL1 Limited (the 'Applicant'), to accompany the application for the minor material amendment, Section 73 (hereafter 'S.73') to planning permission ref: 20190504 at the Former Gravesend and North Kent Hospital (M Block) Clifton Road Gravesend, Kent, DA11 0BY.

1.2 Application ref. 20190504 was granted permission by Gravesham Borough Council on the 17th of February 2022 for: -

Conversion of existing building with an 11 storey side extension and a single storey roof extension, the construction of a new residential building ranging from 3-6 storeys to provide 115 residential units consisting of 47 one bed units, 59 two bed units and 9 three bed units, together with associated parking for 69 cars, 6 motorcycles and 212 cycles, amenity space, private gymnasium and waste and a B1, D1 and D2 flexi use space.

1.3 Subsequent to the granting of this permission, the Applicant acquired the Former Gravesend Hospital Site (hereafter the 'Site') with the aspiration being to implement the consent and deliver the scheme. To enable the delivery of the Site the following changes are sought through this application: -

- Reduction of 2 units, from 63 to 61 units, with a mix of 40 x 1 beds, 21 x 2 beds.
- Relocation of residential amenity (internal spaces) to top floor M&E tower
- Addition of rooftop external communal amenity space
- Amendments to ground floor to provide required plant space to serve the whole scheme
- Reduction in parking within the ground floor of conversion block – from 20 spaces to 12 spaces
- Amendments to bike stores to provide secure internal, dedicated cycle stores
- Addition of below ground sprinkler tank for commercial unit (within tower block)
- Flat layouts revised to accommodate and retain existing structural walls
- New internal core layout to be compliant with building regulations Part B.
- Removal of inset balconies on the east elevation (replaced with projecting balconies)
- Re elevate all conversion block elevations with new window openings and proportions.
- Amended external material palette consisting of brick, glass fibre reinforced concrete panels, corrugated perforated metal balustrades and M&E tower cladding

1.4 All changes listed above relate to the existing Block M, conversion element of the scheme. The remaining new build portions of the scheme are to be retained as per permission ref. 20190504.

1.5 On the 26th of May 2022, this permission (ref. 20190504) was subject to a s96a application which amended the description of development (ref. 20220487). The new description of development is: -

Conversion of existing building with a side extension and a roof extension, the construction of a new residential building to provide residential units (class C3) consisting of one bed, two bed and three bed homes, together with associated car parking, motorcycle and cycles spaces alongside amenity space, private gymnasium and waste and space in Class E as flexi use space.

- 1.6 This application (ref. 20220487) must be read with the original permission and only amends the description of development.
- 1.7 Full details of the proposed amendments are provided in Section 3 of this statement.
- 1.8 This Planning Statement sets out the Site planning history, the current policy context and the proposed amendments to the existing planning permission.
- 1.9 The submission meets the requirements agreed with officers at Gravesham Borough Council ('GBC') and comprises the following suite of documents to be amended from the original submission:
- Application drawings
 - Affordable Housing Statement
 - Cover Letter
 - Completed Application Forms and Certificate of Ownership
 - Daylight, Sunlight and Overshadowing Assessment
 - Design and Access Addendum Statement
 - Ecological Appraisal Addendum
 - Fire Statement
 - Overheating Assessment
 - Planning Statement (this statement)
 - Supporting Transport Statement
 - Updated Air Quality Assessment
 - Noise Impact Assessment Addendum
 - Letters verifying the below documents submitted in support of application ref. 20190504 remain valid for this application:
 - Archaeological Desk-Based Assessment
 - Phase 1 Desk Study (Land Contamination)
 - Flood Risk and Drainage Assessment
- 1.10 This application follows formal and informal engagement with GBC.

2 Relevant Planning History

Site Background

- 2.1 The Site is sustainably located within Gravesend, in the jurisdiction of Gravesham Borough Council (hereafter 'GBC'). Situated within the Gravesham Town Opportunity Area, the Site benefits from the Gravesend Train Station located within the Gravesham Town Centre and primary shopping area a 2-minute walk to the east of the Site. From the Gravesend Train Station central London and international train services from Ebbsfleet Station within 20 minutes.
- 2.2 The Site is framed by the existing NHS carpark to the east and south, and the intersection of Clifton Road and Stuart Road to the northwest. The southwest boundary follows Stuart Road to a row of terrace houses that shape the southwest corner of the Site. Beyond the carpark is Bath Street to the east and Bligh Road to the South.
- 2.3 Covering an area of 0.42ha the Site is home to the Block M, Maternity Ward of the Former Gravesham Borough Hospital. The 5-storey former hospital building remains on vacant, lying along the Sites eastern boundary. There is a steep drop in levels (approximately 3m) from the southwest corner of Site towards the north. Excluding the former hospital building the only other structure on the Site is a substation. The Site is protected by high hoardings (to be replaced by the new owners imminently), despite these hoardings, the Site suffers from fly tipping.
- 2.4 This building, Block M was released from hospital use on the 1st of January 2006, following the Dartford, Gravesham and Swanley Clinical Commissioning Group (CCG) confirming the Site was surplus to NHS requirements. The Site has sat vacant for over 16 years.
- 2.5 Despite its derelict state, the structural integrity of the existing 5 storey building is intact, lending the building to renovation and conversion. The Rectangular building has a strong character comprised with long lines across the façade, adding to the buildings distinctiveness is the 2 storey M&E tower that sits atop the southern area of the building.
- 2.6 The Site is not listed; however, the Grade II listed Hazards House, former Brewery Offices at 45 West Street is located to the north of the Site adjacent to the River Thames. The Site is not within a Conservation Area. The Site lies entirely within Flood Zone 1, with a low risk of flooding.

Planning History

- 2.7 A search of the Gravesend Planning Portal has uncovered several applications relevant to the Site's former use as the maternity ward for the former Gravesend Hospital. As the building has been vacant for more than 16 years, and these applications relate specifically to the hospital use they are not pertinent to this proposal. In the Site's more recent history, an outline application for its redevelopment was granted in 2016, this consent granted the demolition of the existing building and the subsequent erection of a mixed-use development comprising 80 residential units and flexible uses at the ground floor (ref. 20160670). This application has subsequently expired.
- 2.8 In February 2022 permission was granted for the combined conversion of Block M and redevelopment of the remainder of the Site (ref. 20190504). This consent granted permission for:

Conversion of existing building with an 11-storey side extension and a single storey roof extension, the construction of a new residential building ranging from 3-6 storeys to provide 115 residential units consisting of 47 one bed units,

59 two bed units and 9 three bed units, together with associated parking for 69 cars, 6 motorcycles and 212 cycles, amenity space, private gymnasium and waste and a B1, D1 and D2 flexi use space.

- 2.9 In order to facilitate the amendments proposed through this section 73, this permission was subject to a section 96a (ref. 20220487), non-material amendment, which was granted on the 26th of May 2022. This application amended the description of development to the following:

Conversion of existing building with a side extension and a roof extension, the construction of a new residential building to provide residential units (class C3) consisting of one bed, two bed and three bed homes, together with associated car parking, motorcycle and cycles spaces alongside amenity space, private gymnasium and waste and space in Class E as flexi use space.

- 2.10 This minor material amendment seeks to amend permission ref. 20190504 with the description listed at paragraph 2.9.

The Approved Scheme

- 2.11 A search of GBC's online planning application database reflected several applications related to the Site's former use as a hospital, including 3 additional applications seeking its redevelopment. All of these permissions have since expired. Following these submissions, the only application for the redevelopment of the Site is that which is subject to this application (ref. 20190504), submitted on the 29th of May 2019 and approved subject to conditions and a S.106 agreement on the 17th of February 2022 for the following: -

Conversion of existing building with an 11-storey side extension and a single storey roof extension, the construction of a new residential building ranging from 3-6 storeys to provide 115 residential units consisting of 47 one bed units, 59 two bed units and 9 three bed units, together with associated parking for 69 cars, 6 motorcycles and 212 cycles, amenity space, private gymnasium and waste and a B1, D1 and D2 flexi use space.

- 2.12 The approved scheme is a mixed-use scheme of 115 units, 116 sqm of commercial space and associated parking and amenity space. The approved scheme is comprised of two key elements, the conversion of the existing building and a new build element on the remaining area. The approved scheme is broken down as follows:

- Conversion of existing building with an 11-storey side extension and a single storey roof extension
- The construction of a new residential building ranging from 3-6 storeys
- 115 residential units consisting of 46 x one bed units, 62 x two bed units and 7 x three bed units
- Parking for 69 cars (partly below a podium garden and undercroft within the converted building), 6 motorcycles and 212 cycles
- Communal amenity space, private gymnasium and waste and a B1, D1 and D2 flexi use space.

2.13 The Approved unit mix is as follows: -

Table 1: Approved Unit Mix of the Overall Scheme

	1b2p	2b3p	2b4p	3b4p	3B 5P	3B 6P	Total
No. of Units	47	38	21	5	3	1	115
% Of units	40%	34%	18%	4%	3%	1%	100%
Commercial unit							
flexible B1, D1 and D2 unit	116m2						

Table 2: Approved Unit Mix of Block M

	1b2p	2b3p	2b4p	3b4p	3B 5P	3B 6P	Total
No. of Units	35	24	2	1	1	0	63
% Of units	56%	38%	3%	1.5%	1.5%	0	100%

2.14 The approved application includes 16 affordable units. The units are split with 11 units to be provided as social rent and 5 units to be provided as intermediate. An affordable housing plan is required prior to commencement as directed by clause 1.2 of the s106 agreement.

2.15 This approval (ref: 20190504) is subject to 29 conditions, to date, no conditions have been discharged.

2.16 Decision notice ref. 20190504 and 20220487 are included in **Appendix A**.

Pre-Application Engagement

2.17 The Applicant undertook initial informal pre-application engagement with the Council over the period from February to June 2022, when there were a range of meetings with GBC.

2.18 The Applicant engaged formally with the GBC on the 21st of June 2022 to discuss the proposed amendments in principle including the submission of the s96a, the process of the 73 and discussions of a future full application. The meeting was supplemented by a further meeting on the 26th of July 2022 during which the design team reviewed the updated approach to the scheme's fenestration and materials.

2.19 Through these exchanges, GBC accepted the principle of an amendments to the conversion component of the scheme. While this scheme removes two units it is seen that the quality and buildability of the overall accommodation is to be improved, resulting in a buildable and deliverable development.

Approved Documents

2.20 The following details the approved drawings/schedules references, as stated in Condition 2 of the decision notice issued 17th February 2022:

Table 3: Documents listed on the decision notice dated 17th February 2022

Number	Document Name
1	Drawing no. M-B-P6 Revision B (Existing Sixth and Seventh Floorplan M Block) REVISED;
2	Drawing no. M-B-P7 Revision B (Proposed Ground and First Floorplan M Block) REVISED

3	Drawing no.; M-B-P8 Revision B (Proposed Second and Third Floorplan M Block) REVISED;
4	Drawing no. M-B-P9 Revision B (Proposed Fourth and Fifth Floorplan M Block) REVISED;
5	Drawing no. M-B-P10 Revision B (Proposed Sixth and Seventh Floorplan M Block) REVISED;
6	Drawing no. M-B-P11 Revision B (Proposed Eighth and Ninth Floorplan M Block) REVISED;
7	Drawing no. M-B-P12 Revision B (Proposed Tenth and Roof Floorplans) REVISED;
8	Drawing no. M-B-P13 Revision B (Existing East Elevation M Block) REVISED;
9	Drawing no. M-B-P14 Revision B (Existing North and South Elevation M Block) REVISED;
10	Drawing no. M-B-P12 Revision B (Proposed Tenth Floorplan and Roof Plan M Block) REVISED;
11	Drawing no. M-B-P15 Revision B (Existing West Elevation M Block) REVISED;
12	Drawing no. M-B-P16 Revision B (Proposed East Elevation M Block) REVISED;
13	Drawing no. M-B-P17 Revision B (Proposed North and South Elevation M Block) REVISED;
14	Drawing no. M-B-P18 Revision B (Proposed West Elevation M Block) REVISED;
15	Drawing no. L-B-P19 Revision C (Proposed First Floorplan L Block) REVISED;
16	Drawing no. L-B-P20 Revision C (Proposed Second Floorplan L Block) REVISED;
17	Drawing no. L-B-P21 Revision C (Proposed Third Floorplan L Block) REVISED;
18	Drawing no. L-B-P22 Revision C (Proposed Fourth Floorplan L Block) REVISED;
19	Drawing no. L-B-P23 Revision C (Proposed Fifth Floorplan L Block) REVISED;
20	Drawing no. L-B-P24 Revision C (Proposed Clifton Road Elevation L Block) REVISED;
21	Drawing no. L-B-P25 Revision B (Proposed East Elevation L Block) REVISED;
22	Drawing no. L-B-P26 Revision B (Proposed South Elevation L Block) REVISED;
23	Drawing no. L-B-P27 Revision C (Proposed West Elevation L Block) REVISED;
24	Drawing no. L-A-P30 Revision A (Site Location Plan, Existing and Proposed Block Plan) REVISED;
25	Drawing no. ML-B-P28 Revision C (Proposed Clifton Road Elevation) REVISED;
26	Drawing no. ML-B-P29 Revision C (Proposed Stuart Road Elevation) REVISED;
27	Drawing no. ML-B-P30 Revision B (Proposed Section A-A) REVISED;
28	Drawing no. ML-B-P31 Revision B (Proposed Section B-B) REVISED;
29	Drawing no. ML-B-P32 Revision B (Proposed Section C-C) REVISED;
30	View C (1) Car Park Entrance (REVISED);
31	View D (1) Clifton Road/Stuart Road (REVISED);
32	Planning Statement
33	Addendum Design and Access Statement
34	Transport Statement
35	Noise Assessment
36	Urban Design Assessment
37	Landscape Design Document
38	Affordable Housing Statement
39	Phase 1 Desk Study by Lustre Consulting (April 2019)
40	Preliminary Ecological Appraisal)
41	Daylight and Sunlight Study
42	Archaeological Desk-Based Assessment
43	Air Quality Assessment
44	Flood Risk and Sustainable Drainage Assessment

3 Amendments

- 3.1 In line with the approved scheme the description of development remains as follows as approved under (ref. 20220487), non-material amendment, which was granted on the 26th of May 2022.: -

Conversion of existing building with a side extension and a roof extension, the construction of a new residential building to provide residential units (class C3) consisting of one bed, two bed and three bed homes, together with associated car parking, motorcycle and cycles spaces alongside amenity space, private gymnasium and waste and space in Class E as flexi use space.

- 3.2 The proposed minor material amendment to the existing planning permission comprises:
- Reduction of 2 units, from 63 to 61 units, with a mix of 40 x 1 beds, 21 x 2 beds.
 - Relocation of residential amenity (internal spaces) to top floor M&E tower
 - Addition of rooftop external communal amenity space
 - Amendments to ground floor to provide required plant space to serve the whole scheme
 - Reduction in parking within the ground floor of conversion block – from 20 spaces to 12 spaces
 - Amendments to bike stores to provide secure internal, dedicated cycle stores
 - Addition of below ground sprinkler tank for commercial unit (within tower block)
 - Flat layouts revised to accommodate and retain existing structural walls
 - New internal core layout to be compliant with building regulations Part B.
 - Removal of inset balconies on the east elevation (replaced with projecting balconies)
 - Re elevate all conversion block elevations with new window openings and proportions.
 - Amended external material palette consisting of brick, glass fibre reinforced concrete panels, corrugated perforated metal balustrades and M&E tower cladding
- 3.3 These proposed changes provide an overall benefit to the scheme improving the provision of housing and amenity for residents. This application deals only with the conversion block, no changes to the tower or other new build elements are proposed. All changes proposed within the conversion block through this application are designed to tie in with future changes to the tower, which would be covered by a new full planning application for the Site.

Layout and internal rationalisation

- 3.4 Block M of the approved development features 63 residential homes arranged across 7 floors within the former Hospital Building. The approved development seeks the introduction of a central stair core through the existing slab. This core provides access to 11 units per floor. On the eastern elevation external amenity is proposed through inset balconies, with projecting balconies provided to the west. At the sixth storey, the single storey upward extension, 7 residential units, shared amenity, and separate access to the 7th floor (M&E Tower) are provided, the central core ends at this floor. Stepped access into the 7th Floor M&E tower provides access to the final unit of this scheme. Private external amenity space is not provided at the 6th or 7th floor. At the ground floor the approved scheme provides 20 car parking spaces, 6 motorcycle spaces and bike storage for 212 bikes as well as access to the central stairwell and refuse store.
- 3.5 Since the approval of planning permission ref. 20190504 key information about the existing structure has been gathered. Elements such as the location of structural walls and columns central to integrity of the building were not accounted for in the buildings initial design. Following receipt of this information, the internal arrangement of the proposed units required

reorganisation to ensure the proposal is deliverable. While redesigning the space, the Applicant team has re-imagined the layout to improve the overall future occupier experience and the quality of accommodation. Beyond additional information about the existing structure, the design has been amended to address recent changes in building regulations to improve access, prevent overheating and ensure fire safety.

- 3.6 Working within the parameters of the existing structure, the proposal reallocates the central stairwell to the building's southern extent, coordinated with the position of the existing lift core. This reallocation of the stair core reduces the otherwise necessary changes to the buildings fundamental structure, improving the proposals buildability. At the ground floor, shifting the stair core helps to rationalise the space. This reimagined space houses 12 car parking spaces, 6 motorcycle parking spaces, a cycle store, two refuse store, sufficient plant space to serve the building and a sprinkler tank – sized to serve Block M and the commercial unit located in the tower.
- 3.7 Moving to the residential floors, the design seeks to ensure good stacking of units, improving the residential experience throughout the building. While the approved scheme provided external amenity space through inset balconies, due to the structural challenges and to improve the quality of the living space, projecting balconies are proposed. This change improves the overall size of the units (meeting Nationally Described Space Standards) and the amount on natural light allowed in.
- 3.8 Like the approved scheme, the proposed scheme provides a setback sixth storey extension. By reducing the number of units at the 6th and 7th floors (M&E tower) by 2, the proposal sees the introduction of high-quality shared amenity space for residents. The 7th floor, M&E tower, benefits from improved access with the stair core for this element located adjacent to the relocated stairs.

Height and Design Changes

- 3.9 As detailed in the Design and Access Statement Addendum document submitted with this application minor amendments are proposed to ensure the buildability, robustness and longevity of Block M. Element such as the use of combustible materials, the complexity of adding planters into the façade design and the resilience to deterioration of elements of the façade are to be addressed as part of this s73. As noted above, projecting balconies are proposed in lieu of inset balconies, this change required the redesign of the façade and provided an opportunity to ensure the building retains its original iconic character. The replacement of the inset balconies for projecting balconies assists in addressing thermal bridging issues and reduces heat losses, making the building more sustainable for residents while ensuring the scheme is deliverable.
- 3.10 In its heyday, the building had a distinct character with strong horizontal and vertical articulation across the east and west elevations. This character was created through a pattern of concrete clad textured panels was evenly punctuated with large windows in an even grid layout. Vertically, the building composition is clearly articulated with the ground floor plinth supporting, the main body of the structure and the contrasting tower element to the northeast of the scheme.
- 3.11 Seeking to reinvigorate this distinct character, this section 73 seeks to re-elevate the building and pay homage to the buildings original form. To do this, a palette of robust materials have been proposed which add a residential feel to the buildings retained structure. This is done using white and grey brick work combined with light bronze windows and bronzed perforated aluminium balustrades. Tying the former M&E tower amenity space to the proposal, the same perforated bronze sheeting is proposed to encapsulate the M&E tower, save for the towers

southern elevation which features a large statement window. The new build tower element is not included in this s73 and is not proposed to change through this amendment.

- 3.12 As detailed above, the proposal includes the internal reconfiguration of the building and internal amendments to improve the overall buildability and future occupier experience. A key element of this is the conversion of the M&E tower to amenity space. To allow for this conversion, a minor increase to the height of the lowest part of the M&E tower is proposed. Given this modest increase in the overall increase in height is likely to be marginal and indistinguishable to the naked eye.
- 3.13 To enable the delivery of the additional amenity space on the roof of the 6th Floor, a minor increase in the overall building height is proposed. This increase will accommodate the necessary insulation for the flats on the 6th floor while accommodating the turf and landscaping necessary at the roof level. As this increase in height specifically relates to the 6th floor addition, the parapet height of the existing building will be retained.

Quantum

- 3.14 As noted above, the proposal seeks a 2-unit reduction in the overall number of units proposed in Block M. This reduction in units provided an overall benefit to the scheme, allowing for additional and improved shared amenity space.

Residential units

- 3.15 The 2022 consent included a total of 115 residential units comprising a mix of units from 1 bed -2 person units (1b2p) to 3 bed 6 person units (3b6p). Block M housed 63 of these units, comprised of predominantly 1b2p and 2b3p units while also providing two 3+ bed units, a 3b5p and a 3b6p unit. As a result of the changes to the residential mix, the proposal removes both 3 bed units.
- 3.16 As a result of the amendments to the internal changes to Block M, in line with the amended description of development, the proposed amends the overall number of consented units from 115 to 113.
- 3.17 The application seeks to amend the permitted residential mix, which as approved comprises 115 units (47 x 1b2p, 38 x 2b3p, 21 x 2b4p, 5 x 3b4p, 3 x 3b5p and 1 x 3b6p). Table 1 breaks down the approved and proposed mix.

Table 1: Mix – Approved and Proposed Overall

	1b2p	2b3p	2b4p	3b4p	3b5p	3b6p	Total
Approved scheme							
No. of Units	47	38	21	5	3	1	115
% of units	40%	34%	18%	4%	3%	1%	100%
Proposed scheme (SOA Rev. J)							
No. of units	52	27	27	4	2	1	113
% of units	46.4%	23.8%	23.8%	3.5%	1.7%	0.8%	100%

- 3.18 A summary to proposed changes to unit types is shown in the table below.

Table 2: Comparison of consented and proposed unit types in Block M

Unit Type	Consented	Proposed	Change
1b2p	35	40	+5
2b3p	24	13	-11

2b4p	2	8	+6
3b4p	1	0	-1
3b5p	1	0	-1
Total Units	63	61	-2

Affordable Housing

- 3.19 The approved scheme provided 13.9% affordable housing. The location of the affordable housing is yet to be agreed with GBC. As agreed in application ref. 20190504, Block M is an existing vacant building and is eligible for Vacant Building Credit. The loss of two units from the scheme has a negligible impact on the provision of affordable housing with the percent of affordable housing providing amended to 14.1%.

Amenity Space

- 3.20 The consented scheme provides private amenity through inset balconies on the eastern elevation and projecting balconies to the west. Communal amenity is allocated at the 6th floor in the form of an amenity terrace.
- 3.21 Starting from a deliverability perspective, the proposal redesigns the consented inset balconies for projecting balconies. This provides multiple improvements to the scheme, improving the unit sizes, the ability to work within the existing structure of the building, thermal bridging, building performance in terms of sustainability and improving light into the units through decreased shading. Turning to communal amenity, by redesigning the 6th floor extension, the proposal manages to increase the amount of external communal amenity (353.8 sqm) space provided while linking this space to a distinctive internal communal amenity space within the M&E tower. The addition of this indoor communal amenity is a benefit to the scheme improving occupier experience through all weathers.

Parking

- 3.22 The consented scheme includes the provision of parking for 69 cars and 6 motorcycle spaces, allocated across the ground floor of the Site. Twenty of the proposed spaces, and all 6 motorcycle spaces are located on the ground floor of Block M.
- 3.23 As addressed in section 6 below, in line with national, regional, and local policy aspirations, the Applicant seeks to promote a modal shift and reduce the reliance on private vehicles. As an element of this the proposal seeks to decrease the overall quantum of carparking provided on Site, while creating an attractive and easily accessible cycle store (discussed below). The proposed re-coordinated ground floor of Block M accommodates this improved and secure bike store which can accommodate 105 bikes, 12 parking spaces (suitable for provision of EV charging), 6 motorcycle spaces, 2 bin stores and the necessary plant to service the development.
- 3.24 These changes see both an improvement to the buildability of the scheme, which allows for the necessary building services, an enhanced cycle store and the provision of 12 parking spaces equip for EV charging.

Cycle Store

- 3.25 To promote the use of cycling and multimodal transport amendments are proposed to agglomerate the cycle store. By combining there several separated cycle stores currently approved, the Applicant seeks to provide safe and easy access to the bike store that is separate from vehicle parking in the form of a secure bike room. The proposed bike store

supports a range of cycle parking options including 48 double stacker racks (96 bikes), 4 Sheffield hoops (8 bikes – including an accessible space) and 1 space for a cargo/ oversized bike.

Gravesend Borough Council

4 Amendment of Wording and Planning Conditions

4.1 As part of this application, we are seeking to vary the relevant conditions that were attached to the current planning permission to reflect the revised drawings that support the proposed design changes.

4.2 Subsequently, the following represents the proposed Condition 2:

Key

	Documents Submitted with this S.73
	Previously Approved Document

2. The development hereby permitted shall be carried out in accordance with the following approved plans;

Number	Document Name
1	M-B-P3 Revision B (Existing Ground and First Floor Plan (M Block)) REVISED
2	M-B-P4 Revision B (Existing Second and Third Floor Plan (M Block)) REVISED
3	M-B-P5 Revision B (Existing Fourth and Fifth Floor Plan (M Block)) REVISED
4	M-B-P6 Revision B (Existing Sixth and Seventh Floor Plan (M Block)) REVISED
5	2244_0920 (Proposed Ground and First Floorplan M Block)
6	2244_0922 (Proposed Second and Third Floorplan M Block)
7	2244_0924 (Proposed Fourth and Fifth Floorplan M Block)
8	2244_0926 (Proposed Sixth and Seventh Floorplan M Block)
9	2244_0928 (Proposed Eight and Ninth Floorplan M Block)
10	2244_0930 (Proposed Tenth Floorplan and Roof Plan M Block)
11	M-B-P13 Revision B (Existing East Elevation M Block) REVISED;
12	M-B-P14 Revision B (Existing North and South Elevation M Block) REVISED;
13	M-B-P15 Revision B (Existing West Elevation M Block) REVISED;
14	2244_0950 (Proposed East Elevation M Block)
15	2244_0952 (Proposed North and South Elevation M Block)
16	2244_0951 (Proposed West Elevation M Block)
17	2244_0960 (Proposed Section A-A)
18	2244_0961 (Proposed Section B-B)
19	ML-B-P32 Revision B (Proposed Section C-C) REVISED
20	2244_0970 (Proposed West Street Scene)
21	2244_0915 (Site Location Plan, Existing and Proposed Block Plan)
22	2244_0900 (Proposed Ground Floor Site Layout)
23	2244_0901 (Proposed First Floor Site Layout)
24	Drawing no. L-B-P19 Revision C (Proposed First Floorplan L Block) REVISED;
25	Drawing no. L-B-P20 Revision C (Proposed Second Floorplan L Block) REVISED;
26	Drawing no. L-B-P21 Revision C (Proposed Third Floorplan L Block) REVISED;
27	Drawing no. L-B-P22 Revision C (Proposed Fourth Floorplan L Block) REVISED;
28	Drawing no. L-B-P23 Revision C (Proposed Fifth Floorplan L Block) REVISED;
29	Drawing no. L-B-P24 Revision C (Proposed Clifton Road Elevation L Block) REVISED;
30	L-B-P25 Revision B (Proposed East Elevation L Block) REVISED;
31	L-B-P26 Revision B (Proposed South Elevation L Block) REVISED;
32	L-B-P27 Revision C (Proposed West Elevation L Block) REVISED;
33	ML-B-P28 Revision C (Proposed Clifton Road Elevation) REVISED;
34	ML-B-P29 Revision C (Proposed Stuart Road Elevation) REVISED;

35	View C (1) Car Park Entrance (REVISED);
36	View D (1) Clifton Road/Stuart Road (REVISED);
37	2244_0200 (Proposed East Elevation M Block with materials)
38	2244_0201(Proposed North and South Elevation M Block with materials)
39	22_440202 (Proposed West Elevation M Block with materials)
40	S73 Planning Statement
41	Addendum Design and Access Statement
42	Transport Statement
43	Noise Assessment
44	Urban Design Assessment
45	Landscape Design Document
46	Affordable Housing Statement
47	Overheating Assessment
48	Phase 1 Desk Study by Lustre Consulting (April 2019)
49	Preliminary Ecological Appraisal
50	Preliminary Ecological Appraisal Addendum
51	Daylight and Sunlight Study
52	Archaeological Desk-Based Assessment
53	Air Quality Assessment
54	Flood Risk and Sustainable Drainage Assessment
55	Fire Statement

5 Planning Policy

- 5.1 This section outlines the planning policy framework against which the proposed development should be assessed.
- 5.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this instance, the Development Plan comprises:
- The Gravesham Local Plan Core Strategy (September 2014)
 - Remaining Saved Policies of the Local Plan First Review (1994)
 - Kent Minerals and Waste Local Plan (adopted July 2016) and saved policies
- 5.3 The National Planning Policy Framework and National Planning Policy Guidance are also material considerations.
- 5.4 Taking account of the proposed amendment to the original planning permission, and the other relevant subsequent changes, the following adopted policies are considered relevant:
- The Gravesham Local Plan Core Strategy (September 2014)**
- 5.5 Development in Gravesend is guided by 14 Strategic Objectives, these objectives guide both the location and amount of development. Objective SO6 aims to enhance the role of Gravesend town centre as a public transport hub and main location for main town centre uses. SO17 seeks to reduce the need to travel and improve air quality through the siting of development.
- Taking account of the proposed amendment to the original planning permission, the following adopted Core Strategy policies are considered relevant:
- 5.6 Policy CS01 guides sustainable development within the borough. This policy builds on the presumption in favour of sustainable development as included in the NPPF, while promoting a pro-active approach with applicants to find joint solutions that improve the social, economic and environmental prosperity of the area.
- 5.7 Policy CS02 outlines the scale and distribution of development planned for within the borough. This policy recognises the need to deliver the objectively assessed need of 6,170 homes thought out the plan period (through 2028). The Gravesend Opportunity Area is identified to accommodate 890 of these homes throughout the plan period. This Opportunity Area is also earmarked for revitalisation.
- 5.8 Policy CS05 details the development aspirations for the Gravesend Town Centre Opportunity Area. The principle focus for this area is the economic and social activity in the borough. Within this Opportunity Area, among other things, GBC will seek to improve pedestrian access, support high quality residential development, support the redevelopment of under-used sites as well as identifying where these sits improve the overall townscape character.
- 5.9 Policy CS08 sets GBC's aspiration to create a hierarchy of centres while maintaining the subregional role of the Gravesend Town Centre. This policy seeks to encourage the provision of a mix of uses including opportunities for small shops and independent traders in all centres.
- 5.10 Policy CS11 requires new developments to mitigate their impact on the highway and public transport services. This also requires sufficient parking provision in new developments.

- 5.11 Policy CS12 states a no net loss policy in terms of the boroughs biodiversity while promoting the creation of a network of greenspaces across the borough.
- 5.12 Policy CS14 promotes the development of a range of housing types and sizes with the aspiration being to promote sustainable and balanced communities.
- 5.13 Policy CS15 guides the boroughs housing density, providing a locational approach that prioritises accessibility to public transport. Housing density should be guided by good design and should not compromise the distinctive character of an area. The minimum density for Gravesend is 40 dwellings per hectare. This approach promotes an efficient use of land.
- 5.14 Policy CS16 requires affordable housing provision on sites of 15 dwellings or 0.5ha, the affordable housing threshold is set at 30% for urban areas. This policy details the housing mix sought at 70% affordable rented and social rented accommodation and 30% intermediate housing.
- 5.15 Policy CS18 seeks to mitigate the impacts of climate changes guiding the application of the sequential approach to evaluate flood risk. The use of sustainable drainage systems is encouraged to detail will the impacts of surface water run-off from new developments. Policy CS18 also guides water demand management, seeking for all new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption). Finally, this policy also guides carbon reduction requiring the consideration of renewable energy generation and combined heat and power.
- 5.16 Policy CS19 provides development design principles, these principles state that new development will be visually attractive, fit for purpose and resilient to the effects of climate change. Through this policy GBC aim to promote safe and secure development that is resilient to climate change while protecting the amenity of current and future occupiers.

Remaining Saved Policies of the Local Plan First Review (1994)

Taking account of the proposed amendment to the original planning permission, the following adopted Remaining Saved Policies of the Local Plan First Review policies are considered relevant:

- 5.17 Policy LT6 notes that proposals for new housing development will be expected to make provision for open space and play space appropriate to the scale of development proposed while considering proximate open space.
- 5.18 Policy T1 guides that the local authority will consider the impact on transport system from any new development.
- 5.19 Policy P3 states that parking should be provided in alignment with the Kent County Council Vehicle Parking Standards as interpreted by GBC. This policy guides that parking provided should be done so on the development site.
- 5.20 Policy P5 details that where a change of use is proposed GBC will seek to ensure that parking standards are met; a relaxation of these standards is allowed for where provision may be prejudicial to townscape.

National Planning Policy Framework (NPPF) (2021)

- 5.21 The National Planning Policy Framework (NPPF) was updated in July 2021, setting out the overarching planning guidance to which all Development Plan Documents should comply. As such, the NPPF is a material consideration of considerable weight. Guidance as to how the NPPF, Planning Policy and Planning Law should be used in practice is provided within the National Planning Practice Guidance (NPPG).
- 5.22 Presumption in favour of sustainable development lies at the heart of the NPPF. For decision taking, Paragraph 11 sets out that, this means expediently approving development proposals which accord with an up-to-date development plan without delay or, where there are no relevant policies or those policies are out of date, permission be granted unless the application of policies within the Framework which protect assets of importance provide a clear reason for refusing development, or any adverse impacts of approving the proposal would significantly and demonstrably outweigh the benefits.

National Planning Policy Guidance (NPPG)

- 5.23 The NPPG was published by the Government in March 2014 to provide more detailed guidance to support the policies set out in the NPPF (2012). It was partially updated after the publication of the NPPF 2021. The document forms part of the Government's wider strategy of making the planning system more efficient and effective and follows a review of planning policy guidance. The guidance is published as a web-based resource and in 2014 was accompanied by a Written Ministerial Statement by Nick Boles which explained how it replaces or cancels over 150 previous documents. The NPPG includes guidance on 41 categories including health and wellbeing, local plans, design, and the planning application process.
- 5.24 The NPPG highlights that good design is an integral part of sustainable development. New proposals should reflect this requirement for good design (as set out in national, regional, and local policy) while local planning authorities are advised to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. The guidance further outlines that good design seeks to create places, buildings and spaces which work well for everyone and, most importantly, adapt to the needs of future generations.

Housing Delivery Position

- 5.25 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing measured against their housing requirements set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. Based on performance over the past three years, GBC latest Five Year Housing Land Supply Statement published in 2020 identifies that the borough can only demonstrate 3.2 years supply. As GBC cannot demonstrate a 5-year housing supply a 20% buffer must be provided to the 5- year housing land supply. The NPPF guides that where a local authority is unable to demonstrate a 5-year supply of housing, policies related to the supply of housing should be considered out of date. This means that housing proposals should be granted planning permission unless their adverse impacts "significantly and demonstrably" outweigh their benefits.
- 5.26 In addition to the five-year housing land supply, the Government monitors annual housing delivery by local authority area, the Housing Delivery Test (HDT). In the 2021 test, GBC delivered under 75% of its' housing requirement, achieving 56% of the targeted delivery.

Based on this result applications for housing in GBC are subject to the presumption in favour of sustainable development. As with the failure to demonstrate a 5-year housing land supply, policies related to the delivery of housing are considered to be out of date and planning permission should be granted 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.

Gravesham Borough Council

6 Planning Considerations

6.1 The following section assesses the proposed amendments with regards to:

- Principle of Development
- Residential
- Amenity
- Design, Heritage and Townscape
- Parking, Transport and Servicing
- Daylight, Sunlight Overshadowing Assessment

Principle of Development

- 6.2 The proposed amendments do not impact upon the principle of development, as approved under ref. 20190504.
- 6.3 Local Plan Core Strategy CS02 guides development to sustainable locations within the borough. This policy identifies the Gravesend Town Centre Opportunity Area as one of these key locations seeking the delivery of 870 homes in this area throughout the plan period. Policy CS02 goes on to support development that revitalises this area. Consistent with these aspirations, the Site is sustainably located within the Opportunity Area. Having sat derelict and vacant for over 16 years this central Site provides a key opportunity for development and revitalisation. The reactivation of the Site would bring back into use a building distinct to the Gravesend skyline, with these benefits and opportunities at the Site presenting the case for its suitability for development in principle.
- 6.4 Consistent with the 2022 permission, the amended elements that comprise this application will not materially or detrimentally impact the principle of development, with the principle residential accommodation retained. Furthermore, the optimisation of the consented scheme seeks to ensure a high standard of living conditions for future occupiers while guaranteeing the development is deliverable. The proposed changes support deliverability and are encouraged at local, regional, and national policy levels.
- 6.5 The proposed design amendments the approved scheme improve the building's fire safety and buildability. The proposed alterations to the development's-built form do not result in a significant change to the overall appearance of the proposed building and should therefore be considered acceptable.
- 6.6 As demonstrated in the supporting documentation, the proposed amendments will not result in any detrimental impact on the daylight, sunlight and overshadowing assessments when compared to the approved scheme.
- 6.7 In consideration of the above, the principle of development in relation to the proposed amendments is acceptable.

Residential

- 6.8 The proposed amendments to the internal layout of Block M seek to increase the overall quantum of residential floorspace, improving the living space and residential amenity of the units proposed. The principle of conversion to a mixed-use residential scheme remains unchanged.
- 6.9 The internal layout of the Block M has been reconfigured to consider the buildings existing structure. The amended design takes a structure first approach designing to optimise the

resident experience while ensuring the conversion is deliverable. Taking into account Building Regulations Part B a new internal core is proposed.

- 6.10 Further seeking to improve future occupier experience, the proposal amends the buildings eastern elevation, replacing the inset balconies with spacious projecting balconies accommodating private resident outdoor amenity space. Working within the constraints of the existing structure the proposal removes the two, three-bedroom units. With these amendments all proposed units meet or exceed Nationally Described Space Standards.

Table 3: Consented and Proposed Unit Mix Block M

Approved							
	1b2p	2b3p	2b4p	3b4p	3B 5P	3B 6P	Total
No. of Units	35	24	2	1	1	0	63
% Of units	56%	38%	3%	1.5%	1.5%	0	100%
Proposed							
	1b2p	2b3p	2b4p	3b4p	3B 5P	3B 6P	Total
No. of Units	40	13	8	0	0	0	113
% Of units	66%	21%	13%	0	0	0	100%

- 6.11 Given that Block M is subject to Vacant Building Credit and does not deliver any of the schemes affordable housing, a marginal increase is proposed to the proportion of affordable housing delivered.
- 6.12 The proposed affordable housing offer accords with national, regional and local policies. The provided units meet or exceed the Nationally Described Space Standards.

Amenity

- 6.13 It is important to note that as part of the proposed amendments, the Applicant has sought to improve the experience for residents. Emerging from the context of the Covid 19 pandemic the need for amenity space is increasingly evident. Through the rationalisation of the scheme opportunities emerged to provide additional and enhanced amenity space. This enhanced amenity space is provided in the form of a roof terrace located and indoor space in the M&E tower.
- 6.14 Further improving amenity for future occupants, the proposal seeks to enhance the size of the units through the expansion of the units and the addition of projecting balconies. In total the proposal includes:
- 506.1 sqm of communal amenity across Block M, comprised:
 - 353.8 sqm of external amenity; and,
 - 152.3 sqm of internal amenity space.
 - 521.2 sqm of private amenity as projecting balconies.
- 6.15 Local Plan Core Strategy policy CS19 seeks for developments to provide adequate amounts of public and private amenity, the increase in private amenity space aligns with this policy and seeks to enhance the experience of future occupiers.
- 6.16 The principle of enhanced private and communal amenity is supported by local, regional and national policy.

Design, Heritage, and Townscape

- 6.17 The design and layout of the overall proposal is to be retained, with minor amendments proposed to the existing Block M building. Given the amendments to the height of Block M are very minor it is seen that from the ground level these changes are unlikely to be visible.
- 6.18 From a townscape and heritage perspective, the principle of the retention of the form of the existing block M was approved as part of the parent permission. Local Plan Core Strategy Policy CS19 supports the provision of locally characteristic developments. According with this approach, the proposal seeks to retain and enhance the distinct form and design of Block M. While amendments are proposed to the design of the façade, these changes seek to reintroduce elements of the character of the original building reinforcing the character of the overall area. The principle of retaining a visually attractive and locally distinctive building accords with Local Plan Core Strategy Policy CS19 and CS20.
- 6.19 The below table provides a comparison of the unit sizes against Nationally Described Space Standards and shows that all the proposed units meet or exceed the minimum standard provided.

Table 4: Proposal Compared with Nationally Described Space Standards

	1b 2p	2b 3p	2b 4p
NDSS	50 sqm	61 sqm	71 sqm
Proposal	50.7 sqm – 54.6 sqm	65.8 sqm – 68.7 sqm	74.0 – 79.3 sqm

Parking, Transport and Servicing

- 6.20 Through the proposed amendments the Applicant has sought to continue to support the Council's aspiration to encourage sustainable patterns of movement and reduce the reliance on cars.
- 6.21 In 2019 Gravesham Borough Council declared a climate emergency and committed to taking a lead in achieving carbon neutral status. It is widely recognised that transport emissions are one of the top contributors to carbon emissions and that promoting and enabling modal shift is a key way that the development industry can promote emissions reductions.
- 6.22 At a regional level, reducing parking provision is a county wide priority. The Kent Local Transport Plan includes a reduction on the reliance on private cars as a strategic objective. Looking further afield, while Gravesend is outside of London, thus not covered by the policies of the Greater London Authority (GLA) the town benefits from easy access to central London and the jobs and services it has to offer. The Site benefits not only from easy access to the Gravesham train station which provides fast (24 – minutes into St Pancras and Ebbsfleet International in which provides connections to continental Europe) and frequent service to London, but also to the Thames Clipper which provides similar public transport service to the city via the River Thames. On the Site's doorstep future residents serve to benefit from access to and the amenities of the Gravesham town centre and its role as the principle location for retail and leisure development within the borough.
- 6.23 Policies in the GLA London Plan (2021) are known to set a high standard for development, both in terms of quality of accommodation and sustainability goals. In the case of similarly located developments in London, the expectation is for the starting point to be car free, save for blue badge parking.

- 6.24 With this context in mind, the proposal seeks to reduce the amount of car parking provided on Site, in turn supporting modal shift to more sustainable means of transport. To further support this transition and promote modal shift at the Site measures such as the provision of a car club space, cycle hire/cycle club provision as well as the provision of electric vehicle charging / elective vehicle adaptable spaces are being explored. To ensure the low provision of parking does not impact the surrounding network, the Applicant proposed removal of permit parking rights for residents is secured through the s106 in addition to the submission of a travel plan and travel plan monitoring (to be secured by condition). This change sees a reduction from 69 to 61 parking spaces, a retention of 6 motorcycle parking spaces and the provision of 105 cycle spaces provided in a dedicated secured cycle store.
- 6.25 To ensure where private vehicles are unavoidable, electric vehicle charging is proposed.
- 6.26 The principle of reduced car parking in favour of active modes of transport is supported by local, regional and national policy.

Daylight, Sunlight Overshadowing Assessment

- 6.27 A revised Daylight, Sunlight and Overshadowing Assessment is submitted in support of this application. Following the Daylight and sunlight analysis, this report concludes that as there is a negligible change to the overall height and no change to the overall massing of the building, the daylight and sunlight received by neighbouring properties remains the same as that of the approved scheme. Having analysed the internal daylight and sunlight amenity to the proposed scheme the assessment concluded that the proposal meets both local and national standards, with all units benefitting from good levels of daylight and sunlight amenity – particularly for a conversion building.

7 The Tilted Balance

- 7.1 Applications for housing with the jurisdiction of Gravesham Borough Council are subject to the presumption in favour of sustainable development, commonly known as the tilted balance. Whilst the tilted balance applies to this application it is the view of the Applicant that the proposal accords with the Local Development Plan, as such no elements are weighing against the proposal.
- 7.2 Paragraph 7 of the NPPF guides that three overarching objectives cumulatively define sustainable development. These objectives are economic, social and environmental. When breaking down these elements as they relate to this proposal the benefits can be detailed as follows:
- **Economic Objective** – the proposal seeks to enable the delivery of a comprehensive permission for the Site that includes a small amount of retail provision. By bringing housing opportunities to the Site the development provides an increase in tax-paying residents to the borough, with the borough set to benefit from future resident spending. The amendments proposed through this S73 enable the delivery of a scheme that will return an existing derelict building back in to use which will in turn help to perform as a catalyst for further investment in the area.
 - **Social Objective** – the provision of suitable housing in a sustainable location speaks to the social objective of the NPPF. The provision of suitable well-designed housing in a town centre location which helps to address the housing crisis speaks directly to the social objective of the NPPF. By increasing the supply of new homes, the proposal supports the delivery of social benefits including the greater availability and choice of housing. The design of the development maintains the areas current form of development supporting the existing character of the area.
 - **Environmental Objective** – seeking to make the best use of land the proposal firmly supports the environmental objective of the NPPF. The provision of a scheme that converts an existing derelict hospital building for residential use in a sustainable location encourages the use of multimodal journeys epitomises sustainable development.
- 7.3 The proposed development seeks to enable the provision of residential accommodation through the conversion of an existing derelict building to allow for the provision of sixty-one residential flats within a Town Centre area. As demonstrated above, the proposal meets the 3 objectives defined as comprising sustainable development. The Site is subject to paragraph 11, the tilted balance, which tips the planning balance in favour of residential developments where the benefits of the proposal demonstrably outweigh the any adverse impacts. As a proposal that comprises sustainable development, as defined by the NPPF, and accords with the relevant policies of the development plan, it is proposed that the tilted balance is tipped in favour of the development and should be granted permission “without delay” (paragraph 11).

8 Conclusions

- 8.1 This Planning Statement has been prepared by Newsteer on behalf of Strawberry Star SR1 ('The Applicant'), to accompany an application for the minor material amendment to planning permission ref. 20190504 at the Former Gravesend Hospital, Gravesend ('The Site'), as amended under application ref. 20220487 on the 26th May 2022 to have the following description:

Conversion of existing building with a side extension and a roof extension, the construction of a new residential building to provide residential units (class C3) consisting of one bed, two bed and three bed homes, together with associated car parking, motorcycle and cycles spaces alongside amenity space, private gymnasium and waste and space in Class E as flexi use space.

- 8.2 The Application is made to Gravesham Borough Council (GBC), under Section 73 (S.73) of the Town and Country Planning Act 1990.
- 8.3 The proposed minor material amendments are listed in full within this S.73 Planning Statement.
- 8.4 The proposed amendments will allow the applicant to deliver a significantly enhanced scheme. The proposed changes, whilst ensuring the buildability of the scheme will also allow for the betterment of the scheme through improvements to the design of units and the associated amenity space, a better quality of residential accommodation and an improvement to the overall appearance and design of the conversion element of the development.
- 8.5 The proposed amendments have been assessed against the adopted local, regional and national planning policies within this Planning Statement and are considered to accord with the adopted policies.
- 8.6 In consideration of the nature of the development, these changes pose only marginal changes to the external appearance of the building, while maintaining the aspiration of the development and therefore minor, when considered against the full scale of the approved development. Therefore, this proposal is a valid minor material amendment approvable under Section 73 of the Town & Country Planning Act 1990.
- 8.7 To reiterate, the proposed changes are both individually and collectively 'minor' in nature. Further, the changes are both collectively and individually acceptable in planning terms, not raising any additional matters to those previously considered by the Council as part of the 2022 approved permission. As such, we trust that the proposals can be supported by Officers.

APPENDIX A: Decision notice ref. 20190504 and 20220487

Gravesham Borough Council