



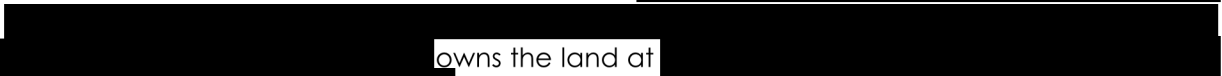
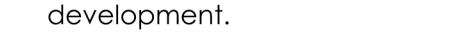
15/03/2024

Mr. Ethan Bonthron
Planning Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Dear Mr. Bonthron,

RE: 20240013 - Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping at Former St Josephs Convent Preparatory School 46 Old Road East Gravesend Kent DA12 1NR

Introduction

1. This letter is submitted on behalf of my clients 

 owns the land at 
 which  the proposed entrance road to the development.
2. After carefully reviewing the submitted plans and documents  does not wish to formally object to the proposal, and at the present time maintains a neutral stance. However, the  does wish to advance a number of comments and concerns regarding the plans, which it is hoped will be considered by Gravesham Borough Council in their decision-making process, and also for the developer's attention in the hope that these matters can be addressed.

Loss of open space

3. The site is currently occupied by a series of buildings associated with the former Preparatory School use which has now ceased. However, the developed part of the site

is less than half of the overall area, the remainder of which is grass playing fields which are open and free from built development.

4. In this context, the site has formed a relatively tranquil and open backdrop for the Vicarage, as well as adjoining houses, the residents of which are all part of the Parish.
5. The development would fundamentally erode this existing open character and the sense of tranquillity associated with it, due to the almost complete loss of the green space, in place of new dwellings, a large medical centre, associated parking and an access road. Whilst an area of landscaping would be located within the central part of the site, this is unlikely to be visible to surrounding residential properties including the vicarage, since the new dwellings would largely enclose and conceal the landscaped area.
6. This will be a marked change in the character of the site, which currently provides a welcome oasis of green space within an otherwise densely populated residential area. The loss of this space is therefore of a concern which requires full consideration as to whether this would comply with planning policy.
7. Aside from the visual and townscape benefits of the site, the playing fields provided an area for outdoor sport and recreation and are classified as playing fields, with strong levels of protection in both the Gravesham Core Strategy Policy CS13 and NPPF paragraph 103.
8. With this in mind, we are concerned by the statutory objection by Sport England, which notes that the applicants' Playing Fields Review does not follow the correct methodology and has not proven the case that the playing fields which are to be lost are surplus to requirements. This is clearly fundamental to the principle of the development of the site, and must be given serious consideration.

Community facilities

9. The existing buildings provide a community use for education purposes, as well as a swimming pool often used by local swimming schools. If the site is redeveloped, these community facilities would be permanently lost.
10. We do not therefore agree with the applicant's assertion in paragraph 6.2.3 of the Planning Statement, that "*The former preparatory school has been vacant since 2021, therefore as the educational use has ceased and remains vacant, it cannot be considered a loss of existing infrastructure.*" This is not an accurate interpretation of policy, since it implies that if an existing operator of a community use ceases operations, the site and buildings no longer provide infrastructure for that use. Plainly that is not how local and national policy is constructed, or it would be too easy to redevelop community facilities simply by ending the existing operation.
11. Instead, it must first be established whether an alternative education operator would be interesting in resuming the use of the site for this purpose, before it can be redeveloped

for other uses. Once developed, this use would be permanently lost, and therefore it is requirement of national policy at paragraph 97 of the NPPF to fully justify the loss of community facilities. Policy CS10 of the Gravesham Core Strategy is also consistent with the NPPF in this respect.

12. Whilst the planning statement suggests that a new medical centre would be provided, this is not the same type of community infrastructure as the existing school. Therefore, it is not possible to ascertain whether this meets the needs of the community in respect of loss of education provision, noting that nursery and pre-school places in particular are in record demand, following recent increases in Government funded places. The planning statement does not properly address these arguments and does not justify the loss of the school as a community facility, contrary to paragraph 97 of the NPPF and policy CS10 of the Gravesham Core Strategy.

Overlooking & loss of privacy

13. Concerns are also raised with the proximity of the medical centre to the [REDACTED] which appears to result in direct overlooking from the first and second floors into the private garden area of the property.
14. This is particularly so given the large floor to ceiling windows proposed in the design, which seems poorly considered for a use likely to involve private medical examinations. The end users of the building do not appear to have been considered, with the privacy of both future occupants and the occupants of the [REDACTED] being significantly compromised as a result. We therefore ask the Council and the applicant to give due consideration to the potential privacy impacts and redesign the building accordingly, or else direct conflict with policy CS19 appears to arise, due to harm to neighbouring amenity from overlooking.

Design

15. The design of the residential dwellings is somewhat bland and generic, and fails to take the opportunities available to create well designed and beautiful places, a requirement of the NPPF at chapter 12. The Design & Access Statement notes a wealth of period architecture in the surroundings of the site, including the old school building that fronts Old Road East, the vicarage and neighbouring properties, and long rows of terraces on Coombe Road and Whitehill Road around the site.
16. Despite this, all the residential dwellings are essentially one dimensional on the front elevation, with no reference paid to the period surroundings of the site, for example with the introduction of bay windows or brick quoins. As a result, the design of these buildings is not contextually appropriate to the setting of the site, and does not respond to local distinctiveness and architecture. The design of these dwellings could be found on any new build estate anywhere, and fail to achieve the standard expected of the NPPF and policy CS19 of the Gravesham Core Strategy.

17. It is further noted that the new block of apartments proposed on the road frontage has at least sought to replicate the period features found in the locality, and it is further unclear why this design approach cannot be maintained across the development. Whilst the general design approach of the new flats is supported, the dark colours are not in keeping with the character of the road and appear inappropriate in the context of all other period buildings utilising white timber window frames and white render where applicable. The character precedent referred to on page 31 does not appear to be anywhere near the site and so does not provide justification for this use of colour, which would jar with the conventional palettes on the road. Subject to this simple change, the design would be significantly enhanced.
18. Concerns are also raised with the overall density of the development and a number of the plots appear cramped with garden sizes even smaller than could be expected for a typical new build scheme (see below).



19. We cannot see the justification for cramming these houses in when they go against the grain of development set by the wider layout. The scheme should be redesigned with these houses omitted to provide a more spacious development.

Highways & Traffic

20. A key concern of the [REDACTED] is the resulting traffic increase from the development. As well as vehicle movements generated by future occupants of the residential dwellings, the medical centre would also attract significant comings and goings on a daily basis. All of the traffic associated with the development, including deliveries, would have to utilise the single access point onto Old Road East. We are particularly concerned about right hand movements from traffic turning into the site in an easterly direction, across westbound traffic. There appears a serious likelihood of traffic backing up towards Echo Square roundabout to the west, causing potentially severe cumulative impacts on the local road network.
21. Old Road East is a busy thoroughfare serving numerous residential and commercial properties as well as several large schools. The reliance on a single entry point for the

whole development, and across traffic moving in a westerly direction, raises serious concerns for the [REDACTED] not just in respect of the vehicle movements, but also for pedestrians and parishioners travelling to and from the Church. The existing access and visibility from the site is poor, and the proposal to relocate the front boundary wall further back would not be sufficient to address this problem, noting that boundary walls would remain in place in the front of the [REDACTED] and the hedge boundary on the other side of the site in front of the other adjacent neighbour.

22. We further note the holding objection of KCC Highways who express concerns regarding the level of parking provision dedicated for the medical centre. We share those concerns that the parking is insufficient to cope with demand, which will inevitably result in parking along the side of the internal access or along surrounding roads, further impeding the safe flow of traffic.
23. We are also concerned that potential overspill parking from the development will mean that evening and weekend parking is lost on the current single yellow line outside the church. This will mean increased pressure on the already limited on street parking in Park Avenue, including on Sundays and when the church hall is in use on weekday evenings. The impact on parking for funerals during the week when the funeral cortege has to park on these single yellow lines is also greatly concerning, and we do not wish to see the use of the church impeded by the new development failing to accommodate sufficient on site parking.
24. In summary, the highways impacts of the development do not appear to have been properly considered. Insufficient parking is proposed to serve the medical centre which would result in overspill onto surrounding roads. The right hand turn into the site across traffic is likely to result in accidents and obstruction of easterly traffic which could back up to Echo Square roundabout. The proposal therefore appears contrary to policy CS11 and paragraph 115 of the NPPF.

Other Matters

25. Whilst it may not strictly be a matter for the planning process, the development will directly impact the boundary of the [REDACTED] due to the proximity of the [REDACTED]. The developer must follow due process including any requirement [REDACTED] to ensure any damage to the boundary is made good at their expense.
26. We further express concerns about the impact of this arrangement on the amenity of the vicarage and its private garden area, which is likely to be subjected to increased levels of noise and disturbance from cars reversing and manoeuvring, doors slamming, pollution and activity. We are unclear on what arrangements will be in place to prevent this space being subject to anti-social behaviour over the weekend when the GP practice will presumably be closed, and there does not appear to be any means to restrict access to the car park off due to its location within the site.

27. We believe there is a likelihood of asbestos and other hazardous materials in the existing buildings due to the age of construction. This must be given proper consideration to ensure any sources of contamination are remediated in accordance with statutory obligations. There must be no burial of contaminated materials within the site.
28. Finally, we note the high volume of objections raised by members of the surrounding community. The Diocese is sympathetic to these concerns, many of which include members of the congregation, and would ask the Council to give full consideration to the matters they raise, many of which align with the concerns of the [REDACTED]

Conclusion

29. In summary, whilst the [REDACTED] do not wish to formally raise an objection to the plans, there are nonetheless a number of concerns with the proposal which it is hoped that the Council will work to address with the developer. In particular, there appears to be little consideration of the loss of the school as a community facility, and the evidence does not demonstrate that the development of playing fields is justified.
30. Further concerns are also raised regarding the design and appearance of the proposal, which would erode the tranquil and spacious back drop to the vicarage and surrounding properties, causing harm to the character and appearance of the townscape. We also consider that the design of the dwellings makes no real effort to respond to local context and distinctiveness, or the objectives of the NPPF to create beautiful places.
31. The orientation of the medical centre with full height glazed windows towards the private garden of the vicarage appears to compromise the privacy of both the occupants of the property and those wishing for privacy during medical examinations, and is a poorly considered element of the design.
32. Highways and traffics impacts are a pressing problem, due to the increase in vehicle movements from both the residential dwellings and the medical centre. We question whether the local road network will be able to cope with this, given existing congestion along Old Road East and the proximity of Echo Square roundabout. Parking seems to be insufficient and overspill could congest surrounding roads to the detriment of visitors to the church. As vehicles wishing to turn into the site from a westerly direction would back up traffic until an opening appeared in east moving vehicles is very concerning, and risks severe cumulative impacts. The safety of all pedestrians in the community must be paramount.
33. Concerns are raised about the proximity of the parking areas to the boundary of the vicarage and the potential for anti-social behaviour when the medical centre is closed. This is another element of the design that has not been well considered. The noise and disruption to the garden of the vicarage are likely to be significant and harmful.

34. In conclusion, whilst the [REDACTED]

Gravesend do not object in principle to the development of this site, and stand ready to welcome future occupants to the community, there are outstanding concerns which must be addressed before the application should be approved. It is requested that the concerns expressed in this letter, and raised by local residents, are given full consideration so that the scheme can be improved and form sustainable development.

35. Should you have any questions on the matters raised in this letter or wish to discuss further, please do not hesitate to contact me.

