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Planning and Affordable Housing Statement (including Planning Obligations Statement and Minerals Impact Assessment)

Huggens College, College Road, Northfleet, DA11 9DL

CLIENT: THE PRESIDENT AND TRUSTEES OF HUGGENS'S COLLEGE

April 2024
JB/HM/NM/30965



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1 INTRODUCTION

1.1 OVERVIEW

1.1.1 This Planning and Affordable Housing Statement has been prepared by DHA Planning on behalf of the President and Trustees of Huggens's College ("the Applicant"), in relation to the proposed redevelopment of land at Huggens College, College Road, Northfleet, Gravesend, DA11 9DL.

1.1.2 The full description of the development is as follows:

"Demolition of existing buildings and erection of retirement living apartments (Use Class C3), together with the extension of the existing chapel and the provision of associated communal facilities and external amenity space, lodge keeper's and guest accommodation, back-of-house facilities, parking, bicycle/mobility scooter parking, and associated works including the creation of a secondary, emergency access from College Road."

1.1.3 This Planning Statement provides a detailed overview of the application site, its context and the relevant planning history, information on the need for the proposed accommodation, and details on the development proposal. It identifies all applicable development planning documents and policies, as well as other relevant guidance and sector research. It also sets out the planning considerations which are regarded as material to the determination of the application.

1.1.4 The application has been subject to positive pre-application discussions with Gravesham Borough Council and relevant technical consultees. In addition, the Applicant has proactively engaged with the existing residents on the site throughout the design development process to ensure that their day-to-day needs were factored into the proposal and any concerns were addressed as early as possible.

1.1.5 The report concludes that the proposal is sustainably located, appropriate in planning terms and accordingly requests that planning permission be granted.

1.1.6 Please note that while the site is referred to throughout this application as Huggens College, which is the official name for the site, the Applicant name has a different spelling as set out above.

1.2 STATEMENT STRUCTURE

1.2.1 The structure of the Statement is as follows:

- Section 2 provides an introduction to the scheme and project background;

- Section 3 sets out the context of the site, the immediate surroundings and the relevant planning history;
- Section 4 has regard to the development proposed;
- Section 5 summarises the pre-application consultation carried out;
- Section 6 reviews the planning policy context by which the planning application will be considered, including having regard to the advice contained in the National Planning Policy Framework (NPPF) and the formal policies of the development plan;
- Section 7 considers the 'principle' of the development and any other relevant planning considerations; and
- Section 8 comprises an affordable housing and planning obligations statement as required by the local validation checklist;
- Section 9 draws conclusions to justify why it is considered that the development is acceptable.

1.3 APPLICATION DOCUMENTS

- 1.3.1 This Planning Statement forms part of a suite of documents that support the planning application, and it is designed to be read in conjunction with the following package of documents and plans. These documents align with the requirements of the Gravesham Borough Council Validation Checklist.

DOCUMENT	AUTHOR
FORMS	
Application Form and Notices	DHA Planning
REPORTS	
Arboricultural Implications Assessment and Method Statement, with accompanying plans	Invicta Arboriculture Tree and Woodland Consultancy
Archaeology and Heritage Assessment	Border Archaeology
Bat Emergence Survey	Kent Sussex Ecology
Biodiversity Net Gain Assessment	Kent Sussex Ecology
Design & Access Statement, including Landscape and Visual Appraisal	Haysom Ward Miller
Energy Strategy	Whitecode
Flood Risk Assessment and Drainage Strategy	Andrew Firebrace Partnership Limited
Noise Assessment	Lustre Consulting
Outline Construction Management Plan	Carter

DOCUMENT	AUTHOR
Phase 1 Geo-Environmental Desk Study	Sevenoaks Environmental Consultancy Ltd
Preliminary Ecological Appraisal	Kent Sussex Ecology
Sustainability Statement	Whitecode
Utility Services Report	PJR
Transport Statement and Access Plan	SLR Consulting
Validation Schedule	DHA Planning

- 1.3.2 The following plans have also been submitted for formal consideration. Revision numbers have not been included should amendments be required post submission.

DRAWING REFERENCE	TITLE
23.709 OS01	Site Location Plan
23.709 EX01	Existing Site and Floor Plans
23.709 EX02	Existing Topographical Survey
23.709 Ex10	Existing Elevations
23.709 EX03	Demolition Plan
23.709 P05	Proposed Site and Block Plan
23.709 P01	Ground Floor Masterplan
23.709 P02	First Floor Masterplan
23.709 P03	Second Floor Masterplan
23.709 P04	Roof Floor Masterplan
23.709 P06	Proposed Hard Landscaping Plan
23.709 P10	Proposed House Types
23.709 P20	Proposed Floor Plans – Block 1
23.709 P21	Proposed Floor Plans – Block 2
23.709 P22	Proposed Floor Plans – Block 3
23.709 P23	Proposed Floor Plans – Block 4 and 5
23.709 P24	Proposed Floor Plans – Block 6
23.709 P25	Proposed Floor Plans – Block 7
23.709 P26	Proposed Floor Plans – Block 8
23.709 P27	Proposed Floor Plans – Block 9
23.709 P30	Chapel and College Rooms
23.709 P40	Proposed Site Context Sections
23.709 P41	Proposed Elevations – Blocks 3, 4 and 6
23.709 P42	Proposed Elevations – Blocks 4, 5, 7 and 8
23.709 P43	Proposed Elevations – Blocks 8 and 9

DRAWING REFERENCE	TITLE
23.709 P44	Proposed Elevations - Blocks 1 and 2
23.709 P100	Phasing Plan
2305_C01	Concept Landscape Plan

2 PROJECT BACKGROUND

2.1 THE APPLICANT

- 2.1.1 This application is submitted on behalf of Huggens's College – an unincorporated registered charity (Charity Number 210336), which was founded in 1847 by local corn merchant John Huggens. At its establishment, the principal objective of the charity was to provide almshouse accommodation for older people in reduced circumstances and it remains the charity's main purpose to this day.
- 2.1.2 The College has been providing affordable housing to its residents without profit for a continuous period of 175 years.
- 2.1.3 Early Ordnance Survey mapping and lithographic imagery show the original Huggens College when it occupied the existing site, together with the land now occupied by Wallis Park. The original buildings were arranged in a courtyard formation, extending from a central church located on the western side of the development. The Chaplain's house (originally a farmhouse and subsequently referred to as a lodge) can also be seen to the north-east of the college buildings.
- 2.1.4 The buildings had a red brick construction with regular terraces of gables with pitched roofs, understood to contain 50 almshouses occupied by residents. The complex was grand in scale and massing, noted to be seen "from miles distant"¹, before the area was more intensively developed in the 20th century particularly around the nearby cement works.

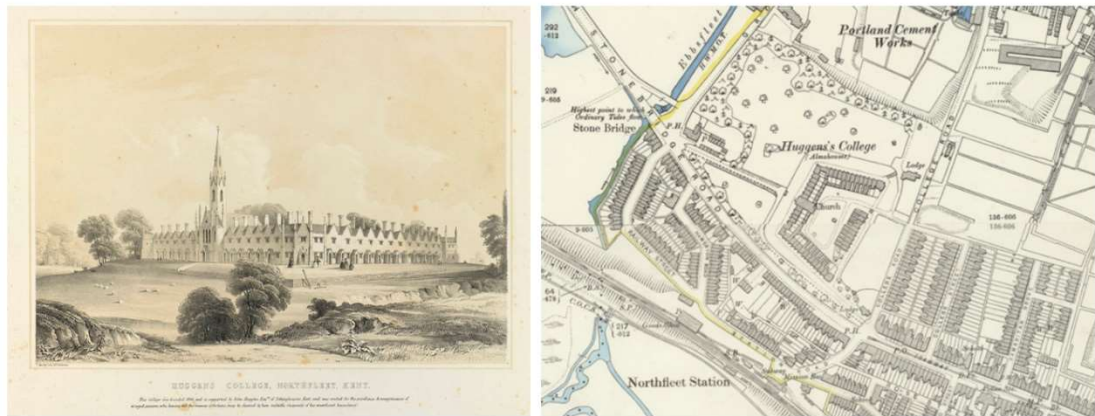


FIGURE 2.1 – LEFT – LITHOGRAPH OF ORIGINAL BUILDINGS (ROYAL COLLECTION TRUST); RIGHT - HISTORIC ORDNANCE SURVEY MAPPING OF THE SITE, DATED BETWEEN 1892-1914 (REPRODUCED WITH THE PERMISSION OF THE NATIONAL LIBRARY OF SCOTLAND)

¹ Miller, W (1871). Jottings of Kent.

- 2.1.5 In the late 1960s, the original College buildings were demolished and the land was subdivided, with the northern part sold to Northfleet Urban District Council (now Gravesham Borough Council) for the development of Wallis Park. The almshouses were rebuilt as a complex of 30 bungalows which have largely remained unchanged to the present day, aside from the erection of front porches under planning permission reference 20070333 in 2007 and internal upgrades and repairs over the years.
- 2.1.6 Huggens College is now home to a community of people, all of whom meet the charity's criteria for new residents. These are as follows: aged at least sixty years old and not in full time employment/self-employment; who are of good character; are of limited financial resource; are capable of independent living; and recognise that the College is a community with Christian values. Photographs of the site are provided in Figure 2.2 below.

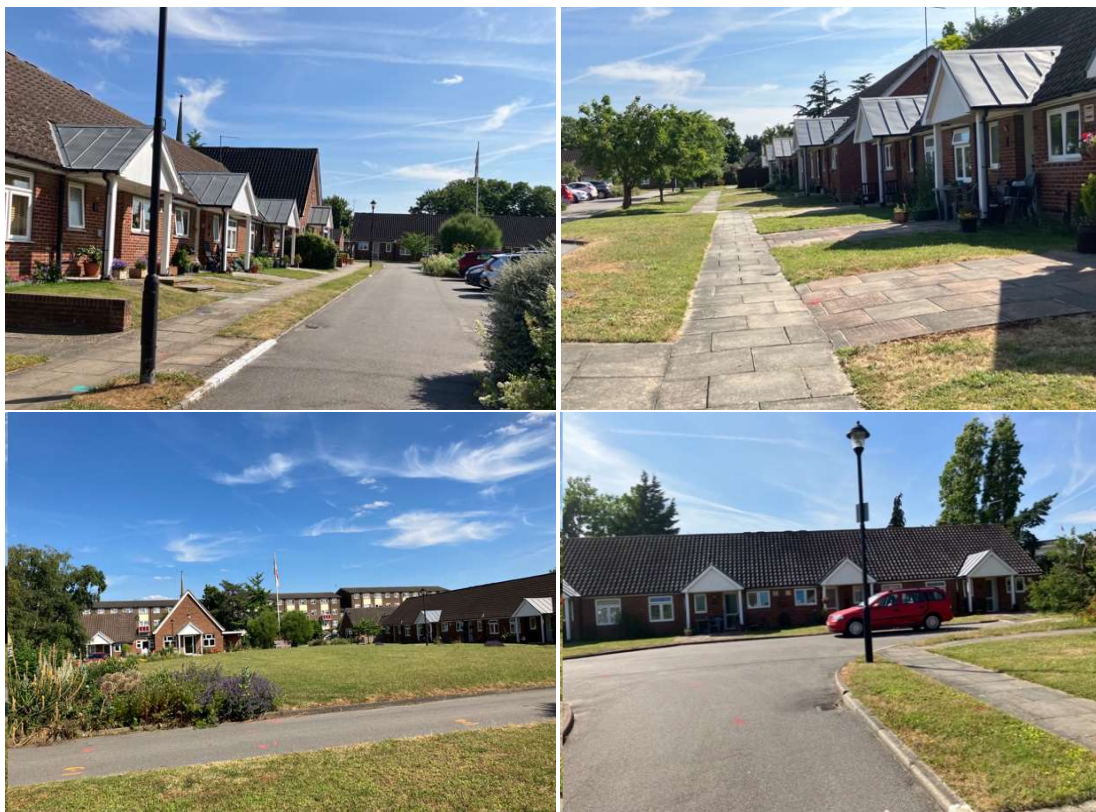


FIGURE 2.2 – PHOTOGRAPHS OF THE EXISTING SITE

2.2 PROJECT BRIEF

- 2.2.1 The bungalows are nearly 60 years old and the site requires a significant level of charitable investment and grant funding to ensure that the almshouses are brought up to current standards. The Applicant also aspires to deliver additional

units within the site to cater for an increased number of residents, thereby furthering the benefit of the charity to a greater number of older people in need.

2.2.2 With the above aspirations defined, a number of objectives were identified for the scheme:

- To deliver high quality and sustainable accommodation suitable for older people, comprised of 1 bedroom units which will maximise natural light.
- To make a more efficient use of land and deliver an increased number of units in a development that remains compatible with the character and grain of the local area.
- To recreate the courtyard arrangement of buildings set within extensive outdoor amenity space to encourage resident interaction with the natural environment and community cohesion.
- To provide private outdoor amenity space either as private gardens (for ground floor units) or as balconies.
- To increase the amount of communal space within the site to cater for the increased number of residents and to provide flexibility for a range of activities.
- To provide a range of back-of-house spaces including cycle and bin storage, lodgekeeper's accommodation, offices and store rooms.
- To ensure minimal disruption to existing residents through an appropriate phasing strategy to prevent any resident from moving more than once and to enable the site to operate during construction works.

2.2.3 These objectives have informed the development of the design described in Section 4.

2.3 INTRODUCTION TO ALMSHOUSES

2.3.1 An almshouse is defined by the Almshouse Association as "*a unit of residential accommodation (usually a house or flat) which belongs to a charity, is provided exclusively to meet the charity's purposes (for example, the relief of financial need or infirmity), and is occupied or is available for occupation under a licence by a qualified beneficiary*".

2.3.2 The main differences between almshouses and standard affordable housing are that the charity will charge a maintenance contribution for the upkeep of the property rather than traditional rent; appoint residents who are beneficiaries of

the charity as licencees, rather than on a short term tenancy; and hold their housing stock in perpetuity².

- 2.3.3 Almshouses have been described as the oldest form of social housing and the forerunner of the housing association movement in the United Kingdom, dating back to the late 10th century ³. Before the 14th century, almshouses were referred to by a number of different names of which some still survive today in title, including 'bede houses', 'hospitals' (implying hospitality), or College⁴, such as the application site.
- 2.3.4 Today, there are more than 30,000 almshouse dwellings around the country which are owned by a network of almshouse charities⁵. Of these, around 500 homes are listed buildings but there are a significant number of more modern almshouse developments that have been delivered in recent years, with more almshouses being built today than have been since the Victorian era.

Benefits of Almshouses

- 2.3.5 The 2021 study titled "Assessment of the Evidence of Financial Benefits Provided by Almshouses", prepared by the Housing Learning and Improvement Network on behalf of the Almshouse Association, reported that almshouses free up 4,000 homes in the private and social housing sectors each year and generate financial benefits to the health and social care sectors of £43 million per year through the provision of safe, secure and affordable housing.
- 2.3.6 This translates to a saving to the health and social care sector of £1,337 per person living in an almshouse per year, as broken down in Figure 2.3 below.

HEALTH AND SOCIAL CARE FINANCIAL BENEFIT MEASURES	VALUE OF FINANCIAL BENEFITS (PER ALMHOUSE RESIDENT, PER ANNUM)
Lower likelihood of residential care admission	£241
Reduction in the likelihood of use of domiciliary care	£420
Reduction in ambulance call-outs linked to falls	£380
Reduction in length of stay and delayed discharges from hospital	£55
Reduction in GP and A&E visits as a result of lower levels of loneliness	£241
TOTAL	£1,337

² The Almshouse Association. Written Evidence.

³ Housing LIN. Transforming Almshouses for the 21st Century

⁴ Nicolls, A (2017). Almshouses in Early Modern England – Charitable Housing in the Mixed Economy of Welfare 1550-1725

⁵ The Almshouse Association. Key Housing Statistics.

FIGURE 2.3 – FINANCIAL BENEFITS PER ALMSHOUSE RESIDENT (SOURCE: HLIN, 2021)

- 2.3.7 Other financial benefits of almshouses to the local economy are the investment in employed staff and voluntary work, estimated to be £56 million per annum.
- 2.3.8 A more in-depth review of the benefits of almshouses on the longevity of its residents was published in May 2023 by Bayes Business School. This study observed that living in an almshouse community can reduce the negative impacts on health and social wellbeing such as loneliness, a common experience for the older population in lower socioeconomic groups, particularly those individuals who are living in isolation.
- 2.3.9 Results of the study show that residents can expect to live as long as wealthier members of the general population despite coming from a more deprived quintile. This longevity boost could be due to both the sense of community and social belonging within almshouses which lead to better physical and mental health. The continuing sense of community at Huggens College is central to the management of the site and has remained at the forefront in the design of the new scheme.
- 2.3.10 Almshouses have also been recognised in terms of their distinct contribution that almshouse charities offer in meeting housing needs. With housing association properties at risk of the Right to Buy, almshouses are protected from loss and will keep affordable housing available in perpetuity.

2.4 NEED FOR OLDER PEOPLE'S HOUSING

- 2.4.1 In February 2018, the Department for Communities and Local Government (DCLG) Committee published a report entitled 'Housing for Older People'. It highlighted the lack of suitable housing for the older generation and called on the Government to come together and improve policies affecting this area, making the following recommendations (amongst others):
- More specialist retirement housing should be built to address a shortfall of supply, estimated to be around 15,000 to 25,000 units each year;
 - Recognition that retirement housing promotes the health and wellbeing of older people;
 - Councils should publish a strategy explaining how they intend to meet the housing needs of older people in their area and, in their Local Plans, identify a target proportion of new housing to be developed for older people along with suitable, well-connected sites for it.

- 2.4.2 The summary to the report concluded:

'National and local planning policy should give greater encouragement to the development of housing for older people. Older people who wish to move should

be able to choose from a wide range of housing to accommodate their needs and preferences.”

- 2.4.3 Following these recommendations, the National Planning Practice Guidance was updated to emphasise the need to provide housing for older people. It states that *“the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”*
- 2.4.4 In the Centre for Ageing Better’s ‘State of Ageing 2022’ report, it was found that the number of people at risk as a result of an ageing population is growing at an ‘alarming rate’, with the latest data showing a sharp increase in pensioner poverty and 1 in 5 people living in poverty in the 2019/20 period. The number of older people renting rather than owning their home has also reached an all time high and the number of people in mid and later life living alone has increased by 67% between 2000 and 2019.
- 2.4.5 The observations seen nationwide are also evident at the local level. The latest Strategic Housing Market Assessment (2016) suggests that the greatest amount of growth in Gravesham is expected to be within age bands over 65. Growth is particularly evident in the 85+ household age band, which is projected to increase by 2,030 householders (144%) over the 25 years from 2012 to 2037.
- 2.4.6 In tandem with the projected population growth in the older demographic, there has been a substantial increase in house prices in Northfleet North (ward) and surrounding areas over the last 10 years, which is likely the result of the significant level of regeneration and infrastructure improvements that have taken place as part of the regional Thames Gateway Urban Regeneration project.
- 2.4.7 One of the earlier milestones for the project was the development of the new Ebbsfleet International Railway Station, approximately 500m to the south of the site, which was opened in 2007 and provides high speed access into London. Whilst this is not directly related to the proposed development, it has meant that the desirability of the formerly lower value land in Northfleet has increased, resulting in huge rises in average house price for local people.
- 2.4.8 The Borough Council has acknowledged that wages have not kept up with house price growth in the borough and over time more and more people have either been priced out of the housing market or they have had to utilise a greater portion of their income on housing costs. Previous discussions with officers have confirmed that there is also a trend of out migration of older people from the borough and this could be due to the lack of sufficient or affordable accommodation available to meet changing needs.

	AVERAGE HOUSE PRICE IN SEPTEMBER 2012		AVERAGE HOUSE PRICE IN SEPTEMBER 2022	
	All	Flats	All	Flats
Northfleet North	£125,500	£95,750	£248,000	£189,500
Gravesham	£180,000	£120,000	£355,000	£180,000

FIGURE 2.4 – AVERAGE HOUSE PRICES IN THE LOCAL WARD AND BOROUGH (SOURCE: ONS)

- 2.4.9 Finally, 2021 Census data indicates that Northfleet North (ward) has a significantly higher proportion of dwellings that are socially rented (27.9%) compared to Gravesham (17.4%) and Kent as a whole (13.6%). This suggests that there will be a localised demand for affordable senior living accommodation in the future.

	OWNS OUTRIGHT	OWNS WITH MORTGAGE, LOAN OR SHARED OWNERSHIP	SOCIAL RENTED	PRIVATE RENTED OR RENT FREE
Northfleet North	17.2%	25.5%	27.9%	29.5%
Gravesham	31.2%	32.1%	17.4%	19.3%
Kent	35.1%	32.4%	13.6%	19%

FIGURE 2.5 – TENURE BY WARD, BOROUGH, AND COUNTY (SOURCE: ONS)

3 SITE DESCRIPTION

3.1 SITE LOCATION

- 3.1.1 This planning application relates to the entirety of the Huggens College site, as shown in Figure 3.1 below, which lies wholly within the built-up area of Northfleet, Gravesend, Kent.
- 3.1.2 The site falls within the administrative area of Gravesham Borough Council and Kent County Council. It does not fall within the boundaries of any civil parish. It also lies close to, but just outside, the Ebbsfleet Development Corporation area.
- 3.1.3 The land at Huggens College extends to 1.72 hectares and currently accommodates 30 no. bungalows (Use Class C3) accommodated by older people aged over 60 who meet the charity's selection criteria (outlined in Section 2). Historic publications confirm that Huggens College was established specifically for older people of reduced means, having been described as such in several publications from the 19th century. Today, the site is generally 100% occupied, other than temporary periods before a new resident moves in, and there is a waiting-list of prospective residents.
- 3.1.4 The bungalows are arranged in a courtyard formation fronting onto a central green space bordered by parking bays to the east and west. The remainder of the site is used as private outdoor amenity space for residents, comprising areas of open lawn, ornamental planting, and a small area of allotments. The site also includes a chapel, community facilities, the Chaplain's house and a lodge house for the groundskeeper/caretaker.



FIGURE 3.1 – EXISTING SITE PLAN (SOURCE: HAYSOM WARD MILLER ARCHITECTS)

- 3.1.5 The site is bounded by an existing brick wall along its south and eastern boundaries, and benefits from natural screening from trees and planting within the northern, western and southern boundaries of the site. Additional, sparser vegetation and trees also exists along the eastern boundary.
- 3.1.6 It is accessed via an existing, gated vehicular entrance from College Road. There are no Public Rights of Way within the site boundary.

3.2 SURROUNDING CONTEXT

- 3.2.1 The site is bounded to the west and north by Wallis Park, which is a 6 storey residential development (including ground) constructed in the late 1960s. To the east is another late-20th century flatted development standing at 2-4 storeys (including ground), separated from the site by College Road, and to the northeast is an extensive area of land undergoing redevelopment as part of the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area.
- 3.2.2 The Opportunity Area forms the northern end of Ebbsfleet Garden City and the land nearest to the site was granted Outline planning permission in 2018 (Ebbsfleet Development Corporation reference EDC/16/0004) for a mixed use development comprising up to 532 homes; 46,000sqm employment floorspace; a new neighbourhood centre with community and retail uses; and extensive areas of open space.
- 3.2.3 The approved neighbourhood centre is expected to be located 5-10 minutes walk to the north of Huggens College and is likely to comprise 850sqm of retail/café/takeaway space and a community centre. There are also a number of new green spaces within the development within walking distance of the site.
- 3.2.4 To the south of the site is Stonebridge Road (B2175) with two storey residential development and Northfleet Station beyond. The road and houses are separated from the site by a patch of grass and the existing boundary wall which stands at approximately 2.73m high. Stonebridge Road connects to High Street immediately southeast of the site, which provides direct access to the centre of Northfleet on foot or by bus. Further south is the Ebbsfleet International Railway Station which was opened to passengers in 2007 and provides high speed access into London.
- 3.2.5 There are also a number of existing facilities within the vicinity of the site including restaurants and takeaways, a public house, all less than 5 minutes' walk away. Additional shops and facilities are available in the centre of Northfleet, which is a 10 minute walk or 2 minute bus ride to the east. The site also enjoys good road and bus access into Gravesend and Bluewater for large shops and a wider range of services. Northfleet Station and Ebbsfleet International Railway Station provided access further afield.



FIGURE 3.2 – APPLICATION SITE (RED) SHOWN ON AERIAL PHOTOGRAPH (SOURCE: GOOGLE EARTH)

3.3 SITE-SPECIFIC PLANNING MATTERS

Statutory Environmental Designations and Habitats

- 3.3.1 The site falls outside any major spatial or landscape designations such as the Metropolitan Green Belt (which covers approximately 76.8% of land elsewhere in the borough) and does not fall within a National Landscape.
- 3.3.2 The site is not covered by environmental designations or Priority Habitats. Although it does fall within the 6km buffer around the Thames Estuary and Marshes Special Protection Area (SPA) and RAMSAR site, which is discussed later in this report.

Flood Risk

- 3.3.3 The site lies within Flood Zone 1 and is therefore at low risk of flooding from local rivers. Further details on flood risk and drainage are contained in Section 7 of this report.

Heritage

- 3.3.4 The site is not located in close proximity to any nearby listed buildings, conservation areas, scheduled ancient monuments or registered parks and gardens.
- 3.3.5 The nearest designated heritage assets comprise a Scheduled Monument called Aspdin's Kiln, approximately 200m north of the site (Listing Entry Number: 1004227) and a Grade II listed building called the Factory Club, approximately 325m to the east (List Entry Number: 1081091). The Hill, Northfleet, Conservation Area lies 700m to the east.
- 3.3.6 Further details on heritage and archaeology are contained within Section 7 of this report.

3.4 PLANNING HISTORY

- 3.4.1 A review of the site's planning history has been undertaken using Gravesham Borough Council's online mapping system which has revealed the following applications for the site:

REFERENCE	DESCRIPTION	DECISION
20141025	Demolition of existing garages and erection of timber storage building and laying out of 8 parking spaces.	Approved 10/12/2014
20130226	Application for Lawful Development Certificate for the proposed erection of a single storey extension on eastern elevation (The Lodge).	Approved 10/04/2013
20070333	Erection of a front porch to 25 of the bungalows	Approved 04/06/2007
19770748	Erection of block of 5 private garages	Approved 01/11/1977
19480951	Erection of a greenhouse.	No objection 31/08/1948

- 3.4.2 A request for pre-application advice was submitted by the Applicant in late 2023 and a meeting was held with officers in December to discuss the early plans for the site. A formal written response was subsequently received and this advice, along with pre-application discussions with other technical consultees, has been discussed in Section 6.

4 THE PROPOSED DEVELOPMENT

4.1 OVERVIEW

- 4.1.1 This planning application proposes the redevelopment of Huggens College, pursuant to the following formal description of development:

"Demolition of existing buildings and erection of retirement living apartments (Use Class C3), together with the extension of the existing chapel and the provision of associated communal facilities and external amenity space, lodge keeper's and guest accommodation, back-of-house facilities, parking, bicycle/mobility scooter parking, and associated works including the creation of a secondary, emergency access from College Road."

- 4.1.2 This section provides a summary of the proposal which has evolved from early discussions with existing residents. Further details on the design are contained within the submitted Design and Access Statement prepared by Haysom Ward Miller Architects.

4.2 PROPOSED LAYOUT

- 4.2.1 The proposed development will follow a similar arrangement to the existing site, with two-to-three storey buildings arranged in a courtyard formation. An additional central block is proposed which will subdivide the existing green into two separate usable amenity spaces for residents. Two new wings are proposed to run parallel to the College Road boundary to either side of the chapel, in the location of the existing bungalows and ancillary buildings.
- 4.2.2 With the exception of the Chapel and garden store, the proposed units will be arranged across two or three floors (including ground), accessible via staircases and lifts, and will be formed of one of five apartment types depending on their position within the site and their outlook, as shown on drawing reference 23.709-P10A. Each apartment will contain a large bedroom with a fitted wardrobe, a bathroom, a kitchen and a living room.
- 4.2.3 The heart of the community will remain within the chapel building which will have a flexible internal floor plate for use as a chapel and a community room that can be opened up into a larger communal hall as required. The building will be extended to the north to provide an additional flexible meeting room, a larger kitchen and additional toilet facilities.
- 4.2.4 Two other community rooms will be introduced elsewhere in the site to provide internal space for residents to use on a day-to-day basis which are likely to be used as a library/card room and an arts/crafts room.

- 4.2.5 Block 2 will be set aside for largely back-of-house uses including the lodge keeper's house, laundry room, office, and store. There will also be 4 x guest suites for families and friends to use on a short term basis.
- 4.2.6 The Chaplain's house and the existing Residents' and Gardener's store building will be retained.

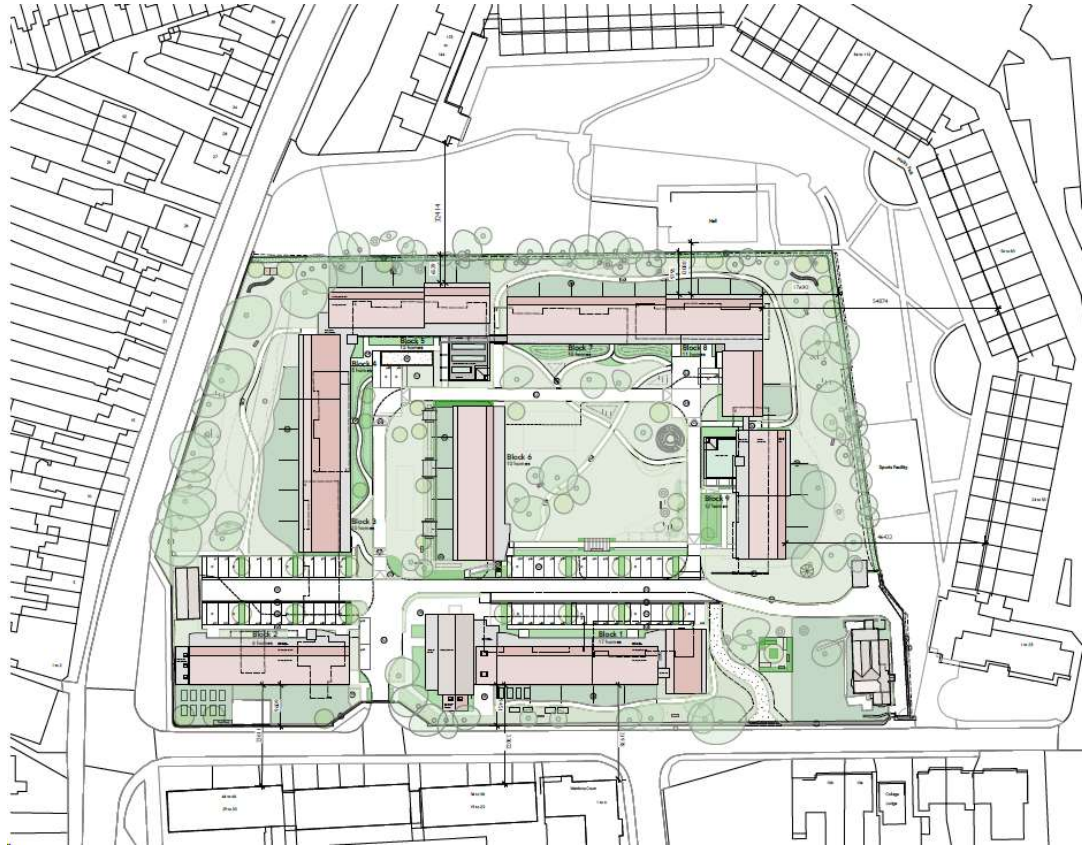


FIGURE 4.1 – PROPOSED SITE LAYOUT (SOURCE: HAYSOM WARD MILLER)

4.3 HOUSING MIX AND TENURE

- 4.3.1 All units will be one-bedroom homes with an internal floor area of 55m². They will be 100% affordable in perpetuity, owned and managed by the Huggens' College charity.
- 4.3.2 The proposed units fall under Use Class C3 as a form of sheltered housing. No care provision will be provided by the charity and one of the requirements of admission is that residents are able to live independently.

4.4 LANDSCAPING

- 4.4.1 The re-provision of external amenity space was central to the development of the design as this space is valued by the existing residents and remains an important aspect of the site's character. The proposed development seeks to make a more meaningful use of these spaces through the provision of active gardens, including opportunities for activities and social spaces, enhanced habitats, improved pedestrian connectivity, and improved water management.
- 4.4.2 Details of the landscaping scheme are provided on drawing reference 3205-C01-B prepared by Emily Haysom.

4.5 ACCESS

- 4.5.1 The existing access to the site will be maintained from College Road, with no changes proposed.
- 4.5.2 During the construction phase, a second site access will be provided for the management of vehicles during construction. This secondary site access will remain in place after completion to serve as an emergency access point.

4.6 PARKING

- 4.6.1 The proposed development proposes 55 parking spaces, including 18 disabled bays, in addition to the retained parking provision at the Chaplain's house.
- 4.6.2 Cycle parking will be provided in secure cycle stores located within each block. These provide space to store both cycles and mobility scooters to suit the requirements of residents depending on their physical health and age.

4.7 WASTE AND RECYCLING

- 4.7.1 Five bin stores will be located around the development, each containing general waste, recycling and food waste bins. The swept path analysis provided by SLR Consulting in the submitted Transport Statement demonstrates that a refuse vehicle can enter, turn and exit the site in a forward gear.

5 PLANNING POLICY FRAMEWORK

5.1 INTRODUCTION

- 5.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act, applications for planning permission are required to be determined in accordance with the Development Plan in force unless material considerations indicate otherwise.
- 5.1.2 In this case, the adopted Development Plan for Gravesham currently comprises the following of relevance to the site:
- Gravesham Local Plan Core Strategy and Policies Map (2014);
 - Gravesham Local Plan First Review 1994 (saved policies); and
 - Kent Minerals and Waste Local Plan 2013 - 2030 (2016).
- 5.1.3 In addition to the Development Plan, other material considerations include the National Planning Policy Framework (amended December 2023) ('NPPF'); the National Planning Practice Guidance (NPPG) as previously described; and a number of locally adopted supplementary planning documents (SPDs) and guidance (SPGs) comprising:
- Residential Layout Guidelines SPD2 (1996, amended in 2020)
 - Kent County Council Development Contributions Guide (2007)
 - Kent Design Guide
 - Landscape Character SPG1 (2006)
 - Biodiversity Conservation SPG2 (2006)
 - Archaeology in Historic Towns SPG3 (2006)
 - Kent Vehicle Parking Standards SPG4 (2006)

5.2 ADOPTED DEVELOPMENT PLAN

Gravesham Core Strategy (2014)

- 5.2.1 The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main

areas where major change is likely to take place and allocates sites which are key to achieving the strategy.

- 5.2.2 The site is located within the built-up area boundary of Northfleet which is classified as a First Tier settlement area. First Tier settlements are together known as the main 'urban area' of the borough and are deemed most sustainable in planning terms. The Local Plan also supports specialist forms of accommodation in these areas in principle, under Policy CS14.
- 5.2.3 The site is not specifically allocated for development; however, the Local Plan seeks to prioritise development in the main urban area and promote the regeneration of previously developed land such as this (Policy CS02).
- 5.2.4 The site also lies within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, as outlined in red in Figure 5.1 below, which is covered by Policy CS03 and is referred to as representing a "substantial opportunity for major riverside regeneration".
- 5.2.5 To the north and north east of the site are Key Sites, shaded in pink. The road to the south is a Highways Network District Distributor (Policy T1-T3), beyond which is an existing residential area of dwellings. The Northfleet Local Centre (purple star) is located 180m to the east.

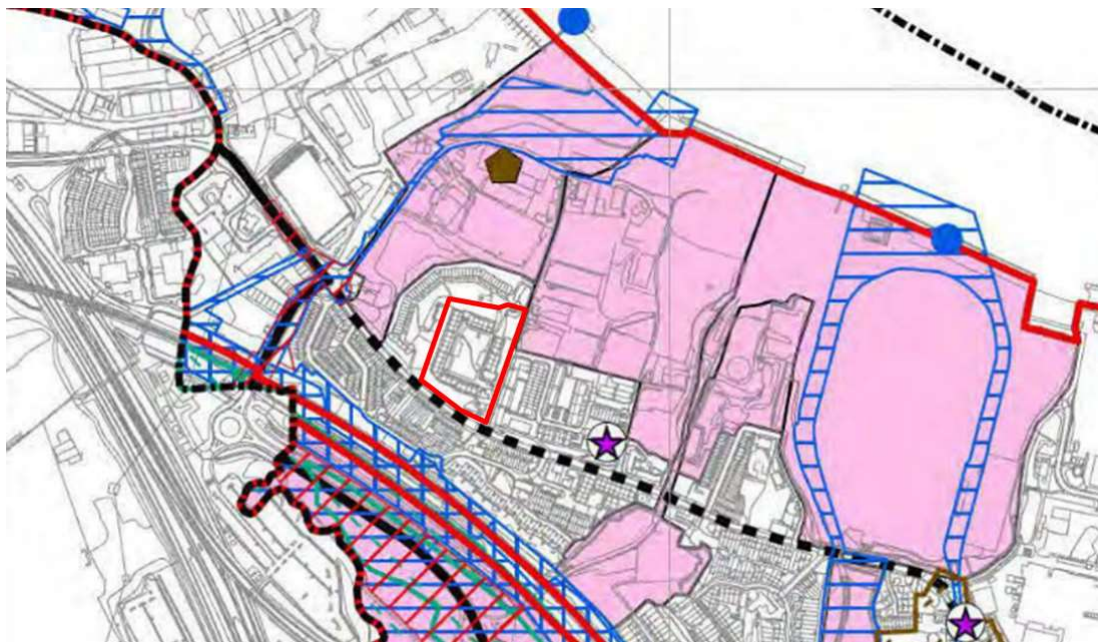


FIGURE 5.1- EXTRACT OF THE GBC POLICIES MAP (SOURCE: GRAVESHAM BOROUGH COUNCIL)

- 5.2.6 The following Core Strategy ('CS') policies are considered to be of particular relevance to this site:
- Policy CS01 – Sustainable Development

- Policy CS02 – Scale and Distribution of Development
- Policy CS03 – Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- Policy CS10 – Physical and Social Infrastructure
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density
- Policy CS16 – Affordable Housing
- Policy CS18 – Climate Change
- Policy CS19 – Development and Design Principles
- Policy CS20 – Heritage and Historic Environment

Saved Policies in the Gravesham Local Plan First Review (1994)

- 5.2.7 The Gravesham Local Plan First Review was originally adopted in November 1994. The following remaining saved policies are relevant to the consideration of this application:
- Saved Policy H6 – Provision to Meet Special Housing Needs
 - Saved Policy P3 – Vehicle Parking Standards
 - Saved Policy T1 – Impact of Development
 - Saved Policy T5 – New Accesses onto Highway Network
 - Saved Policy TC7 – Archaeology

5.3 MATERIAL CONSIDERATIONS

National Planning Policy Framework (2023)

- 5.3.1 The National Planning Policy Framework (NPPF) was most recently updated in December 2023 and sets out the overarching planning strategy for England. The

overarching principle of the NPPF is a clear presumption in favour of sustainable development (paragraph 10 and paragraph 11).

- 5.3.2 Paragraph 11 of the NPPF defines the presumption in favour of sustainable development, which for decision making means approving development proposals that accord with an up-to-date development plan without delay or where there are not relevant development plan policies, or the policies which are most important are out of date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance⁶ provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 5.3.3 Paragraph 8 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental which cannot be considered in isolation, as they are mutually dependent.
- 5.3.4 Section 5 of the NPPF sets out the Government's overarching aspirations for housing supply. It states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements (such as older people) are addressed and that land with permission is developed without unnecessary delay.
- 5.3.5 Paragraph 70 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. Great weight should be given to the benefits of using suitable sites within existing settlements for homes.

Housing Need and Supply

- 5.3.6 Paragraph 75 of the NPPF states that local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies. Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met:
- a) Their adopted plan is less than five years old; and
 - b) That adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.
- 5.3.7 In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of

⁶ Including, but not limited to, listed buildings, National Parks, Areas of Outstanding Natural Beauty.

housing if the provisions in paragraph 226 apply. Paragraph 226 applies to authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need.

- 5.3.8 The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).
- 5.3.9 Paragraph 79 states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites that have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:
- a) Where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
 - b) Where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of the framework, in addition to the requirement for an action plan.
 - c) Where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, in addition to the requirements for an action plan and 20% buffer.
- 5.3.10 The Gravesham Core Strategy set out a requirement for at least 6,170 new homes delivered at a variable rate of between 325 homes and 438 homes per annum over the plan period. However, as the plan is more than 5 years out of date, the standard method for assessing Local Housing Need (LHN) now identifies a minimum annual housing need figure for the borough. The Government's Standard Methodology (using December 2020 Revised Methodology) results in a LHN of 722 dwellings per annum.
- 5.3.11 The requirement to use the government's standard method for LHN combined with an added 20% buffer now means that GBC's Five Year Supply Statement (Published March 2023) sets out that the district can only currently demonstrate a housing land supply equivalent to 2.9 years.
- 5.3.12 As a consequence, the housing policies contained within the Local Plan must be acknowledged as out-of-date and the presumption in favour of sustainable development would apply when determining planning applications. This means

more weight should be given to the benefits of providing housing provided the site contributes to sustainable development.

- 5.3.13 The presumption in favour of sustainable development has also been established by the Housing Delivery Text (2022 measurement) which shows the Gravesham have delivered 53% of their housing need in the last 3 years.

Emerging Local Plan (Local Plan Update)

- 5.3.14 The Council published in 2020 a Regulation 18 (stage 2) consultation on its proposed Development Management Policies Document, replacing the 2018 Stage 1 version, which will in due course form part of and update the Gravesham Local Plan.
- 5.3.15 Under paragraph 48 of the NPPF, policies in this document may be accorded weight in the decision-making process with this varying according to its stage of preparation; the extent to which there are unresolved objections; and the degree of consistency of policy with those in the Framework.
- 5.3.16 As the Development Management Policies Document is at an early stage and the fact that the consultation has only recently concluded, the Council have confirmed in recent planning committee reports, that the policies therein should at this stage be given very limited weight.

Supplementary Planning Guidance and other Documents

- 5.3.17 SPDs are prepared to further elaborate on particular policies or proposals from the Local Plan to give guidance on how they will be implemented.
- 5.3.18 GBC have published a limited number of SPDs, most of which relate to superseded policies or are masterplans for areas unconnected to the site. The most relevant SPDs have informed the proposed design and are addressed where necessary in Section 7 of this report.

6 PRE-APPLICATION CONSULTATION

6.1 OVERVIEW

- 6.1.1 The proposals have evolved through consultation with existing residents, and Gravesham Borough Council and Kent County Council as the local planning authority and statutory consultees. This section summarises the feedback received during those discussions.

6.2 GRAVESHAM BOROUGH COUNCIL PLANNING OFFICERS

MATTER	SUMMARY OF ADVICE RECEIVED
Principle	The application site is within the urban area of Northfleet where the principle of residential development is acceptable. Policy CS02 was acknowledged that prioritises the redevelopment and recycling of underused, derelict and previously developed land in the urban area.
Housing Type and Size	Sheltered housing will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants. The site is already provided for those who meet certain criteria, and this will not change. This also means that the dwelling mix is limited. Given this is an existing situation and the accommodation is provided for those in need, no objection is raised to the lack of mix in this instance.
Density	Policy CS15 was acknowledged which states that 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. The proposed density accords with this policy. In addition, it was noted that the surrounding area consists of a much higher density development and therefore the current situation is more out of character with the surrounding area than the proposed plans.
Design, Character and Appearance	In terms of the surrounding character, it was noted that the street scene is mixed both in terms of dwelling type and appearance. In terms of design there are no particular features within the street scene. It was concluded that the proposal to increase the amount and height of the buildings on site to create two and three storeys will not appear out of character. The use of red brick is quite prominent in this location and therefore no objection was raised to its use. The asymmetrical pitched roofs were noted to be in keeping with the surrounding area and it was observed that the differing angles add some interest to the development. The proposed development, in terms of design, was concluded to confirm with local and national planning policies.
Amenity	The proposed house types accord with Nationally Described Space Standards and it was noted that each habitable room contains a window which appeared to have sufficient outlook. It was noted that the locally adopted standards state that, where habitable rooms face each other a window-to-window distance of 21m should be provided. As it stands the nearest properties are to the southeast of the site and sufficient privacy distances appeared to be provided. It was suggested

MATTER	SUMMARY OF ADVICE RECEIVED
	that the proposed dwellings are not located any closer to these flats than the existing bungalows numbering 25 to 30. <i>Separation distances are explained in Section 7 of this report.</i> Due to the path of the sun and proposed height of the buildings, together with the space around them, it was considered that the proposal is unlikely to have any detrimental impact in terms of loss of sunlight, daylight or outlook.
Ecology	It was advised that developers would need to pay £314.05 for every new dwelling provided within 6km of the Ramsar site and SPA. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds. It was added that the government will be introducing BNG as a way to contribute to the recovery of nature while developing land. <i>A BNG Assessment has been submitted with the application. Draft Heads of terms are contained in Section 8.</i>
Transport	It was noted that a Transport Statement will be required, and advice should also be sought from the Highway Authority at KCC. A Construction Management Plan should be provided with the application, or it is likely to be required as a pre-commencement condition. <i>A Transport Statement and Outline Construction Management Plan have been submitted.</i>
Refuse	Details of waste storage and collection should be submitted with the application. <i>Details on waste storage and collection is provided in Section 12 of the Design and Access Statement. Please refer to the submitted Transport Statement which shows how a refuse vehicle can access and exit the site in forward gear.</i>
Contamination	A desktop study for contamination should be submitted with the application. <i>This has been submitted.</i>
Flood Risk and Drainage	The site is within Flood Zone 1 but is larger than 1ha and therefore a flood risk assessment is required. Drainage details should be included in any forthcoming application. <i>A Flood Risk Assessment and Drainage Strategy have been submitted.</i>
Developer Contributions	Contributions may be required from GBC Leisure, the NHS and Kent County Council. Affordable Housing needs to be considered as part of the application. <i>This is addressed in Section 8 of this report.</i>

MATTER	SUMMARY OF ADVICE RECEIVED
EIA Development	It was concluded that the proposal does not fall within the definition of EIA development.
Phasing	It was noted that the submitted plans appeared to be acceptable in terms of phasing the development. If not submitted with the application, a pre-commencement condition would be recommended that would require the following information: exact details of what each phase development will contain; details of the construction access points into the site; and how the existing residents will be protected during the construction phase. <i>An indicative phasing plan and Outline Construction Management Plan are submitted with this application. It is expected that both will be detailed and agreed via condition.</i>

6.3 TECHNICAL CONSULTEES

REFERENCE	DESCRIPTION
GRAVESHAM BOROUGH COUNCIL	
Environmental Protection	Environmental Protection requested the submission of a Phase 1 Geo-Environmental Desk Study and Noise Assessment. A Construction Environmental Management Plan is expected to be required. <i>An Outline Construction Management Plan and Noise Assessment have been submitted as part of this application and it is expected that a detailed version will be agreed through a pre-commencement planning condition.</i>
Waste and Recycling	Officers confirmed that the amount of refuse and recycling bins is sufficient for this type of development. A turning area for a waste collection would need to be provided, along with provision for food waste. <i>Information is provided in the submitted Design and Access Statement and Transport Statement.</i>
Leisure	Comments have been provided in respect of developer contributions. <i>Please refer to Section 8 of this report.</i>
Private Sector Housing	No comments were provided as it was considered that the scheme fell outside their remit.
Housing Strategy	Indicated that affordable housing provision would need to be required with the proposed development. <i>This is discussed in Section 8 of this report.</i>
Highways	GBC Highways confirmed that a Transport Statement would be required to justify the level of car parking provision and comments were made on

REFERENCE	DESCRIPTION
	council expectations. It was recommended that the Highways Authority was consulted. <i>Please refer to the submitted Transport Statement for details on this engagement.</i>
KENT COUNTY COUNCIL	
Highways	SLR Consulting have been engaging with the Local Highways Authority and details are contained within the submitted Transport Statement.
Ecology	Confirmed that ecological reports would be required in support of the submission, including a Biodiversity Net Gain Assessment once the 10% mandatory requirement was established. <i>Please refer to the submitted BNG Assessment.</i>
Heritage	KCC Heritage requested the submission of an Archaeological Desk-Based Assessment as part of the application. <i>The draft report was prepared by and submitted to KCC Heritage in advance of this submission.</i> Officers commented that the background research is comprehensive, and the conclusions are fair based on the evidence available. Advice was given on where further detail was recommended and this has been factored into the revised report.
THIRD PARTIES	
Southern Water	Southern Water requested details on whether the existing sewerage system can accommodate the proposed development flows, confirmation of the presence and ownership of any existing public sewers crossing the site, and for a formal application to be made for a connection to the public water main. In addition, it was noted that surface water is required to follow the surface water hierarchy as required by Building Regulations. <i>A Utility Services Report prepared by PJR is submitted with this application which addresses the above requirements on utility connections. Surface water drainage is addressed in the submitted Flood Risk Assessment and Drainage Strategy.</i>
Kent Fire and Rescue	Kent Fire and Rescue requested confirmation that there is vehicle access for a pump appliance to within 45m of every point of the footprint of the proposed buildings measured along the route of the hose, or fire mains fitted in accordance with paragraphs 13.5-6 of ADB Vol 1. Access for a fire tender and pump appliance is possible via the internal vehicular routes within the site.

6.4 EXISTING RESIDENTS

- 6.4.1 The Applicant and design team have liaised closely with existing residents to ensure that they were well informed of the developing design and to enable questions, suggestions or concerns to be addressed as early as possible. Details of this engagement and the feedback received has been contained in the submitted Design and Access Statement.

7 PLANNING ASSESSMENT

7.1 INTRODUCTION

7.1.1 This Statement provides a Planning Assessment for the proposed development demonstrating how the proposal complies with the relevant material planning considerations. The following matters are considered to be relevant to this Planning Application:

- The Principle of Development;
- Design and Layout;
- Transport and Servicing;
- Flood Risk and Drainage;
- Archaeology and Heritage;
- Ecology and Trees;
- Energy Strategy;
- Amenity.

7.2 THE PRINCIPLE OF DEVELOPMENT

7.2.1 The principle of development within a First Tier settlement area, in which the site falls, is supported by Policy CO2 of the Core Strategy which establishes the urban area as a sustainable location for new housing. The strategy for the urban areas includes promoting regeneration by prioritising the redevelopment and recycling of underutilised and previously developed land in the area.

7.2.2 This position was confirmed by officers during pre-application discussions.

7.2.3 As noted in Section 5 of this report, it is clear that there is a significant need for new housing within Gravesham, which is a highly constrained borough where 78% of land is within the Metropolitan Green Belt. With a significant shortfall in suitable housing land, it is vital that sites within the main urban area are appropriately utilised to deliver the housing required to meet local needs.

7.2.4 The proposed development seeks to provide for a quality residential development to address growing demographic changes, with data showing an ageing population with greater numbers in rented accommodation and a greater number of people living alone within the borough. The suite of studies set out in Section 2 demonstrate the importance of supporting and delivering purpose built housing

for older people to free up larger housing stock, encourage social cohesion, reduce the likelihood of loneliness and to deliver the suite of other benefits generated for the NHS and other local services.

- 7.2.5 More generally, the wider area is also undergoing significant change following planned and approved developments throughout the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area (Policy CS03).
- 7.2.6 In addition, this unique site relates to affordable housing that has been provided to the local community for 175 years. The new units on the site will increase the number of units available to those in need and will be retained in perpetuity for those who meet the admission requirements of Huggens College. The development is essential to enable the continued operation of the site.
- 7.2.7 The principle of the development is therefore acceptable and appropriate in line with local and national planning policies and clear evidence on the need to provide suitable accommodation for an ageing population. In addition, the tilted balance currently in effect means that more weight should be given to the provision of new homes. There are no adverse impacts that would significantly and demonstrably outweigh the benefits in accordance with the NPPF and Policy CS01.

7.3 DESIGN AND LAYOUT

- 7.3.1 National planning policy emphasises the importance of design for new development. The overall aim for the scheme was to create a development which respects the character and appearance of the area, whilst meeting the specific needs of the intended occupants.
- 7.3.2 Policy CS19 states that new development should 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. Account should be taken of scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Development should also accord with the adopted Residential Layout Guidelines, and should be designed to be inclusive and adaptable.

Appearance and Design

- 7.3.3 The design approach has taken precedence from the Ebbsfleet Design Guide which draws heavily on precedents from the local historic context while also supporting buildings of a more contemporary character. The proposal is therefore formed of primarily red brick with lighter brick accents and dark brick plinth features to add interest. The rooves of the buildings will be comprised of red tile roofing with asymmetrical roof forms.
- 7.3.4 The proposed palette was supported in principle by officers during pre-application discussions.

- 7.3.5 The courtyard layout of the buildings has also been retained to maximise outlook onto green spaces for all units, which is positive to mental health and wellbeing, and to retain the overall landscaped character of the site.
- 7.3.6 The proposed units will meet Nationally Described Space Standards and have been designed to be adaptable to meet the varied needs of older people. The dwellings have also been designed to a standard of accessibility in line with Building Regulations Part M4(2), Category 2: Accessible and Adaptable Dwellings, so the homes will be readily adaptable for wheelchair living or those with mobility difficulties.

Density and Amount

- 7.3.7 Policy CS15 states that all new housing should 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. 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.
- 7.3.8 The existing site is very low density compared to the developed land in the immediate surroundings, at a level of around 18 dwellings per hectare, significantly below the expected density set out in Policy CS15. By comparison, the eastern side of College Road is identified in the Design Guide as "Northfleet Riverside" with a proposed neighbourhood density of 51-90 dph. As a result there is an opportunity to make a more effective use of the site to deliver more homes to meet growing local needs.
- 7.3.9 The proposed development results in a development density of 56 dwellings per hectare which was confirmed to be appropriate by officers during pre-application discussions. This density has been achieved by increasing the height of the buildings and increasing the amount of built form on site, without impacting on the overall landscaped character.

Height

- 7.3.10 With the exception of the Chapel and the Residents' and Gardener's Store, the proposed units will be arranged across two or three floors (including ground). The three storey elements are located in select parts of the site to add interest and variety to the massing.
- 7.3.11 The development will be comparable to, and in some cases lower than, the existing built form in the surrounding area. This was acknowledged by officers during pre-application discussions who agreed that the development would not be out of character and would accord with local planning policies.

- 7.3.12 It is also notable that the original Huggens College was a development complex of scale and this was noted as a key characteristic of the site in historic publications. The proposed increase in massing will therefore be aligned with the original design intent albeit with a more contemporary approach to design.

Landscape Design

- 7.3.13 The landscape scheme has evolved through close liaison with existing residents and has focussed on the creation of active garden spaces, increased habitats and connectivity and water management. Details of the landscaping strategy are contained in the submitted Design and Access Statement.

7.4 TRANSPORT AND SERVICING

- 7.4.1 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement are required to be supported by a Transport Statement or Transport Assessment. The NPPF clearly states at Paragraph 111 that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.4.2 Policy CS11 states that 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.
- 7.4.3 A Transport Statement has been prepared by SLR Consulting and is submitted in support of the application. This report confirms the following:
- The existing access is appropriate for continued use and compliant visibility splays can be achieved from the secondary construction and emergency access.
 - The site is accessible by a range of transport modes with good walking, cycling and public transport infrastructure for residents to use. A Travel Plan will be prepared to further support and encourage non-car means of transportation or car sharing where possible.
 - Swept path analysis confirms that the site layout can comfortably accommodate vehicle movements for all relevant vehicle types, and that they can access and egress the site in a forward gear. A security bollard will be used north of the parking area to control vehicular access to the route leading to the residential blocks, so as to prevent unnecessary trips in the main amenity areas.

- The proposed development includes a policy compliant provision of car parking for residents, the lodge keeper, the Chaplain and visitors. In addition 18 accessible bays can be accommodated to suit the proposed demographic.
 - The proposal is in excess of local standards in terms of cycle and mobility parking provision to encourage use where physical capabilities allow.
 - Electric vehicle parking will be provided in accordance with Part S Building Regulations.
- 7.4.4 The prior consent of the Chaplain is required for residents to bring a car (including motorcycles and mobility scooters) into the College, meaning that the Applicant is aware of the number and nature of vehicles on site at all times. Only one car per housing unit is permitted.
- 7.4.5 The proposal therefore aligns with Policy CS11, the NPPF and local parking standards. The proposed parking strategy has been agreed in principle with Kent Highways.

7.5 FLOOD RISK AND DRAINAGE

- 7.5.1 Policy CS18 states that the Council will seek to minimise the impact of drainage from new development on waste water systems. New development must not generate more than 105 litres of water per person per day.
- 7.5.2 A Flood Risk Assessment and Drainage Statement has been produced by AFP and is submitted in support of this application. It confirms that the site is at low risk of flooding from all sources. There are no known issues with existing flooding within the site.
- 7.5.3 The surface water drainage strategy will comprise raingardens, filter drains, a geo-cellular soakaway tanks, infiltration basins and permeable surfacing.
- 7.5.4 The foul water drainage strategy will comprise a gravity sewer system connecting into the foul water sewer system located within College Road.

7.6 ARCHAEOLOGY AND HERITAGE

- 7.6.1 Policy CS20 states that the Council will preserve, protect and enhance its heritage and historic environment.
- 7.6.2 As such, and as requested by officers during pre-application discussions, an Archaeology and Heritage Assessment has been prepared by Border Archaeology and is submitted in support of this application.

- 7.6.3 The Archaeological Assessment has assessed the site's overall potential in archaeological terms as moderate in relation to the Romano-British and medieval periods and moderate to high for the prehistoric period. A programme of further archaeological investigation will need to be agreed.
- 7.6.4 In terms of heritage impact, the proposal is deemed to have a neutral/slight impact on the undesignated 19th-20th century Chaplain's house and walls of Huggens College. The setting of both these structures has already been significantly altered, with the scale of the proposed development being largely consistent with their historic setting and the surviving historic fabric will not be impacted by the proposed works, other than creation of the new secondary/emergency access and pedestrian walk-through.
- 7.6.5 The NPPF states that in weighing up applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset. Given the significant housing need in Gravesham and overall acceptability of the scheme in planning terms, this neutral/slight harm is considered strongly justified.

7.7 ECOLOGY AND TREES

- 7.7.1 Policy CS12 states that a multifunctional linked network of green spaces, will be created, protected, enhanced and maintained in the borough. It states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.

Ecology

- 7.7.2 A Preliminary Ecological Appraisal (PEA) has been produced by Kent Sussex Ecology and is submitted in support of this application.
- 7.7.3 The site is not part of, nor adjacent to, any statutory designated site for nature conservation. The site is located within 440m of the 'Swanscombe Peninsula' Site of Special Scientific Interest (SSSI), located to the west/north-west. The 'Thames Estuary and Marshes' Special Protection Area (SPA) and Ramsar site is located approximately 6km to the east.
- 7.7.4 The following observations are made in relation to protected species:
- **Bats** – Evidence to suggest crevice-dwelling species utilising the external features of the existing buildings was identified, therefore further emergence surveys have been undertaken. A Bat Emergence Survey has been produced by Kent Sussex Ecology and is submitted in support of this application. None of the trees on-site were considered to have bat roosting potential.

- **Great Crested Newts** – There is a relatively small area of suitable terrestrial habitat on-site, however the site does not contain any waterbodies or ponds within c.250m. The nearest waterbody is within 500m of the site but considerable dispersal barriers between these waterbodies and the site exist. The site is strongly delineated by a mostly impenetrable brick wall, therefore Great Crested Newts are considered likely to be absent.
- **Reptiles** – A data search did not return any records of reptiles within 1km of the site beyond 1990. Whilst a relatively small area of suitable habitat exists on-site for reptiles, the site is relatively isolated regarding wider habitat connectivity and the mostly brick wall perimeter makes colonisation by reptiles improbable. Therefore, reptiles are considered likely to be absent.
- **Badger** – A data search returned a 2003 record of badger(s) very close to the site. Whilst no evidence of badger use or setts were observed on-site, there is possibility that they could forage on-site (possibly gaining access via the entrance gates or elsewhere).
- **Breeding Birds** – evidence of nesting Starlings was observed under the western gable end of the Chapel building, and it is likely that some common bird species nest within the boundary trees/scrub and hedgerow.

7.7.5 In light of the findings of the bat emergence survey, a number of outline mitigation measures are recommended within this report which include:

- Avoiding works to the roof of building B7 (and B9) (see report for references) between May to August and November to March. This leaves October or April as the optimum time period for the dismantlement of the roof.
- During the construction phase, it is recommended that the tiles on B7 and B9 be removed by hand and under the supervision of a licensed bat ecologist. If bats are found during construction activities, a licenced bat ecologist will ensure no harm comes to the bat(s) and that legislation is not breached.
- An appropriate replacement roost must be incorporated into the development to ensure 'favourable conservation status' is maintained.
- Traditional bitumen felt will need to be used to line the roof rather than breathable roofing membrane.
- External and internal lighting must not impact the new roosts and, in general, lighting across the development should be designed in a sensitive manner so to maintain a suitable environment for bats.

Biodiversity Net Gain

- 7.7.6 A Biodiversity Net Gain Assessment has been submitted as part of this application, which demonstrates that the proposed landscaping scheme will deliver a biodiversity net gain of 15% and 55% for area and linear habitat, respectively. This significantly exceeds the national requirement of 10%.
- 7.7.7 The gains identified will be delivered within the defined phases within which they fall and it is expected that this will be agreed via condition.

Arboriculture

- 7.7.8 An Arboricultural Impact Assessment and Tree Survey has been prepared by Invicta Arboriculture and is submitted with this application.
- 7.7.9 The report identifies the trees that are proposed for removal as part of the application, of which a majority are either recommended for removal as a result of their condition or they are a low value specimen. Their removal will not have an adverse effect on the overall landscape character.
- 7.7.10 Recommendations have been made on tree protection measures that will be put in place during the course of construction. These will ensure that the health and integrity of the retained trees are intact through to occupation.

7.8 ENERGY STRATEGY

- 7.8.1 An Energy Strategy and Sustainability Report have been prepared by Whitecode and are submitted with this application.
- 7.8.2 Due to the lack of an available network nearby connection to an existing district heating network, therefore highly efficient Air Source Heat Pumps (ASHPs) are proposed for the heating and hot water for the buildings. The proposed energy strategy has carefully considered the suitability of the systems proposed on site for the intended demographic.
- 7.8.3 The report concludes that the development can achieve a 67% improvement over Part L 2021 of the Building Regulations through the use of ASHPs.
- 7.8.4 In accordance with the Residential Layout Guidelines, the proposed development will generate a demand of 104.6 litres of water per person per day which improves upon the optional requirement set out in Building Regulations.

7.9 AMENITY

- 7.9.1 Policy CS19 states that new development must safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring

properties and land; and avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination.

Privacy, Daylight and Sunlight

- 7.9.2 The Gravesham Residential Layout Guidance SPD2 states that all applications for new dwellings (including flats) will be expected to comply with the Borough Council's privacy distances and guidance on overshadowing.
- 7.9.3 Where windows of habitable rooms face each other (whether across a road, pedestrian way or private garden) a window-to-window distance of at least 21 metres should be provided. Habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms.
- 7.9.4 In addition, a minimum distance of 21 metres should be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first 5 metres of garden adjacent to the rear of the dwelling.
- 7.9.5 The proposed development achieves the required 21m separation distances from all nearby dwellings. However, as Block 1 has semi private gardens at ground floor level, the additional 5m separation distance required cannot be achieved. This was deemed to be acceptable for the following reasons:
- The required window to window separation distance of 21m can be achieved.
 - The additional 5m buffer for residential gardens is expected to prevent opportunities for overlooking. In this case, the opportunities for overlooking would be taken from the College Road properties into the semi private gardens at Huggens College. There are already communal gardens along the eastern boundary of Huggens College which are within the 26m separation distance, therefore the relationship between garden area and the properties on College Road would be unchanged.
 - The garden areas for the ground floor units would be semi-private (not private as referred to in the SPD) and a stretch of communal garden area will be retained closer to the wall.
 - There is an existing wall and vegetation on the boundary which adds to the sense of separation between the two sites.
- 7.9.6 Officers agreed with the principle of this approach during pre-application discussions.
- 7.9.7 The proposals are of a scale that will not affect daylight and sunlight for nearby properties.

Noise

- 7.9.8 A Noise Impact Assessment has been prepared by Lustre Consulting and is submitted with this application.
- 7.9.9 Background noise levels were recorded at five locations around Huggens College, through which it was identified that traffic noise from Stonebridge Road is the main noise source affecting the site. The report concludes that using the recommendations proposed, internal noise levels within the site will be in line with local and national guidance limits.

Land Contamination

- 7.9.10 As requested by Environmental Protection, a Phase 1 Geo-Environmental report has been prepared by Sevenoaks Environmental Consultancy and is submitted with this application and recommendations are made on further investigations.

Odour and Light Pollution

- 7.9.11 Due to the residential nature of the proposals, the development is unlikely to result in any tangible impacts on odour and light spill. The increase in units and windows will inevitably result in visible internal lighting on the upper storeys, however this would not appear out of place in the immediate developed context.

Phasing and Construction

- 7.9.12 The impact of construction on existing residents was carefully considered from the outset and an indicative Phasing Plan has been submitted to demonstrate how the site will be phased to ensure that any potential disruption is kept to a minimum.
- 7.9.13 It is expected that a detailed Phasing Plan will be agreed via condition which will set out the extent of each phase and development contained within that phase (including the number of parking spaces).
- 7.9.14 As set out in the Design and Access Statement, the four key objectives for the phasing strategy were as follows:
- Minimise the noise and disturbance to the existing residents throughout the works.
 - Construct enough new homes in each phase to provide sufficient accommodation for the residents moving across and clear the space required for the following phase. The intention is that residents will only need to move once.
 - Achieve a clear separation between construction activity and the daily access and operational arrangements for existing residents, staff and visitors.
 - Funding considerations so that income from new homes can contribute to the funding of later phases.

- 7.9.15 An Outline Construction Management Plan has been submitted with this application which sets out the construction management principles that will be adhered to by the future contractor to minimise disturbance for existing residents and surrounding properties. It is expected that this document will be expanded into a full Construction and Traffic Management Plan to be agreed through a pre-commencement condition.
- 7.9.16 As the owner and operator of the site, the Applicant will ensure that the detailed Construction Management Plan is adhered to at all times.

7.10 MINERALS IMPACT ASSESSMENT

- 7.10.1 The Kent Minerals and Waste Local Plan (Early Partial Review 2020) shows the site within a Minerals Safeguarding Area for River Deposits. The site is not within 250m of, nor will cause permanent loss of, a Safeguarded Minerals Facility.
- 7.10.2 Given the long-term residential nature of the site, its position with the built-up area and proximity to other high density residential development, the site would not be an appropriate site for mineral extraction. As such the site's development will not affect the long-term prospects for future working.

8 AFFORDABLE HOUSING AND PLANING OBLIGATIONS STATEMENT

8.1 AFFORDABLE HOUSING STATEMENT

- 8.1.1 Policy CS16 of the Local Plan Core Strategy states that the provision of 30% affordable housing will be required on all new housing developments of 15 dwellings or more, or on sites of 0.5 hectares or more in the urban area.
- 8.1.2 The supporting text to Policy CS14 states that for affordable housing, the greatest need is for one bedroom properties (37%), two bedroom (32%) and three bedroom (28%) properties. However, this need is reflective of all demographics and the Housing Officer has confirmed that they would expect senior living sites to deliver predominantly one bedroom units, as is proposed within this application.
- 8.1.3 The National Planning Policy Framework (2023) defines affordable housing as housing for sale or rent, for those whose needs are not met by the market. The existing and proposed accommodation at Huggens College inherently falls within this definition by providing truly affordable accommodation at a significantly reduced rate for older people in need, without profit, and this has been the arrangement for 175 years.
- 8.1.4 This was accepted to be the case on a number of other almshouse schemes such as the new development at St John's Hospital, Winchester (reference: 22/01425/FUL), and a development delivered by Southwark Charities in Southwark (reference: 20/AP/3250).
- 8.1.5 Nevertheless, and notwithstanding the 100% affordable housing provision proposed on site, it is expected that the Section 106 legal agreement will include a clause stating that if the charity ever dissolves and/or the properties are sold, at least 30% of the units on the site (as a whole planning unit) must be provided as affordable housing in accordance with Policy CS16.
- 8.1.6 In addition, it is important to note that Huggens College as a charity is in the process of becoming a Registered Provider which will be required to access funding from Homes England. The charity has reached Stage 2 of the registration process, which means that the charity has passed the initial eligibility checks.
- 8.1.7 In light of the above, and given the inherently affordable and charitable nature of almshouse accommodation, it can be concluded that proposal goes substantially beyond the requirements of Policy CS16. Further discussion with officers is welcomed during the course of determination.

8.2 PLANNING OBLIGATIONS STATEMENT (DRAFT HEADS OF TERMS)

- 8.2.1 It is expected that those party to the Section 106 agreement for the site will be the Applicant and Gravesham Borough Council.
- 8.2.2 The President and Trustees of Huggens's College hold the freehold title to the land which comprises the whole of the land registered at the Land Registry under Title Number K528877.
- 8.2.3 The components of the Section 106 are suggested below. Any monetary figures are calculated based on the net increase of units on site.
- That if the charity ever dissolves or the properties are sold, at least 30% of the site-wide provision must be provided as affordable housing in accordance with Policy CS16.
 - That all residents must meet the criteria set by Huggens College.
 - A payment of £20,727.30 to offset potential recreational impact on the North Kent Ramsar Sites or Special Protection Areas.
 - An adult education contribution of £2,257.86.
 - A library contribution of £4,133.58.
 - A social care contribution of £11,9238.08.
 - An NHS contribution (subject to the requested amount).
- 8.2.4 The following components are not required given the nature of the use:
- Primary and secondary education and land contributions given that the residents are over 60 years of age. This was confirmed by Kent County Council.
 - Youth contributions, given that the residents are over 60 years of age. This was confirmed by Kent County Council.
 - Sport and leisure contributions given that the residents are over 60 years of age.
- 8.2.5 As above, we would request a discussion with officers on the content of the Section 106 during the course of determination.
- 8.2.6 Please refer all Section 106 enquiries to DHA Planning in the first instance.

9 CONCLUSIONS

9.1.1 This Planning and Affordable Housing Statement has been prepared on behalf of the President and Trustees of Huggens's College, in support of a full planning application for the redevelopment of Huggens College, College Road, Northfleet, DA11 9DL.

9.1.2 The full description of the development is as follows:

"Demolition of existing buildings and erection of retirement living apartments (Use Class C3), together with the extension of the existing chapel and the provision of associated communal facilities and external amenity space, lodge keeper's and guest accommodation, back-of-house facilities, parking, bicycle/mobility scooter parking, and associated works including the creation of a secondary, emergency access from College Road."

9.1.3 The application has been subject to positive pre-application discussions with Gravesham Borough Council and relevant technical consultees. In addition, the Applicant has proactively engaged with the existing residents on the site throughout the design development process to ensure that their day-to-day needs were factored into the proposal and any concerns were addressed as early as possible.

9.1.4 The principle of development on the site has been recognised by planning officers in light of its position within the main urban area and within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area which has been identified as a suitable location for significant levels of development to meet local housing needs. This is even more relevant in light of the housing land supply and delivery shortfalls in the borough and the tilted balance in favour of sustainable development as set out in the NPPF.

9.1.5 Evidence at a local and national level demonstrates a significant need for specialised housing for older people, with an ageing population and a localised need for affordable housing options. Almshouses offer significant benefits for their residents in light of the highly communal environment which supports social cohesion, reduces loneliness and improves general wellbeing, with knock-on benefits to the local health services and the NHS. They also provide affordable housing, resulting in 100% provision across the site, which is significantly in excess of local planning requirements. This will be secured via an appropriately worded Section 106 legal agreement with provision for the retention of affordable units should circumstances change in the future.

9.1.6 The low density of the site offers an exciting opportunity for a more effective use of land in light of other higher density development in the local area, without adversely impacting on the landscape character of the site which will contain meaningful areas of outside amenity space with significant levels of planting for local wildlife and natural screening.

- 9.1.7 This Statement demonstrates that there are no adverse planning implications in terms of design, transport, drainage, servicing and ecology.
- 9.1.8 As such it is hoped that the Council is able to support the application in reflection of the positive discussions held to date and we look forward to working proactively with officers during the course of determination.