



St Columba's Close, Gravesend

Planning statement

Gravesham Borough Council

October 2022

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For further information, contact:

Gerry Cassidy, Partner Planning gcassidy@bptw.co.uk

London Studio

40 Norman Road
Greenwich
London SE10 9QX
t. 020 8293 5175

Midlands Studio

Alpha Works, Alpha Tower
Suffolk Street Queensway
Birmingham B1 1TT
t. 0121 667 6175

bptw.co.uk

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	Name	Position	Date
Prepared by	Dominic Richardson	Assistant Planner	20.10.22
Reviewed by	Will Philps	Senior Planner	26.10.22
Approved by	Andrew Mills	Senior Associate	26.10.22

For and on behalf of BPTW

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Appendices

Appendix 1. Site Location Plan

1.0 Introduction

1.1. This Planning Statement has been prepared in support of a detailed planning application submitted to Gravesham Borough Council (**the Council**) by BPTW, on behalf of Gravesham Borough Council (**the Applicant**), for the development of St Columba's Close (**the Site**).

1.2. This application seeks full planning permission for the following description of development:

Demolition of Nos. 1 -12 St Patricks Gardens, Nos. 36 – 41 St Patricks Gardens, and Nos. 28 – 42 (even nos. only) St Columba's Close, and associated caretaker's facility. Erection of 2no. 2 storey buildings, 1no. 3 storey building and 1no. part3/part4 storey building to provide 46 residential dwellings (Class C3 residential use), with associated vehicle and pedestrian access, amenity space with hard and soft landscaping, car and cycle parking, refuse and recycling storage provision, and other associated works.

1.3. The purpose of this Planning Statement is to set out the development proposal and how it relates to the statutory development plan and other material considerations. The Planning Statement should be read in conjunction with the submission documents below in paragraph 1.4.

Submission Documents

1.4. In addition to this Planning Statement, this application is accompanied by the following documents:

Report	Author
Application Form and Cover Letter	BPTW Planning
Affordable Housing Statement	BPTW Planning
Daylight, Sunlight, and Overshadowing Report	Waldrams
Design and Access Statement - Including Utilities Statement	BPTW Architecture
Existing Elevations Survey	EDI Surveys Ltd
Flood Risk Assessment	Ridge
Land Contamination Assessment	RPS
Landscape Design and Access Statement	ME Landscape Studio
Noise and Vibration Impact Assessment	NOVA Acoustics
Planning Obligations Statement	BPTW Planning
Plans, Elevations and Section drawings	BPTW Architecture
Preliminary Ecological Appraisal (including bat survey)	Greenlink
Statement of Community Involvement	Comm Comm
Sustainability and Energy Statement	KLH
Transport Statement	SWECO
Tree Survey and Report	PJC
Tree Map	GBC
Sewage and Surface Water Drainage Strategy	Ridge
Unexploded Ordnance Assessment	Fellows

Structure of this Statement

1.5. This Planning Statement is structure as follows:

- > **Section 2** describes the site and its surrounding context and identifies any relevant planning history.
- > **Section 3** summarises the pre-application advice received.
- > **Section 4** outlines the community consultation that has taken place.
- > **Section 5** describes the proposal.
- > **Section 6** identifies the relevant planning policy.

- > **Section 7** assesses the proposal against the identified policy.
- > **Section 8** draws together the conclusions of the report.

Gravesham Borough Council

2.0 Site and Surrounding Area

- 2.1. The site is located between Valley Drive, St Dunstan's Drive, St Patrick's Gardens and St Columba's Close. It is bounded by housing to the north and east, Valley Drive to the west and the public amenity space and playground of St Patrick's Gardens to the south. The site is 1.079ha.
- 2.2. It is south of the centre of Gravesend. The topography of the site slopes westwards to the valley that extends northwards to the river Thames.
- 2.3. The site itself consists of six residential blocks within the boundary and green space which serves as communal amenity. The centrally located open space is surrounded by three of the blocks of flats. The open space is poor quality, providing limited facilities, with one cherry tree towards its northern edge.
- 2.4. There are rear gardens with close-boarded timber fences backing on to this space. The upper three blocks surround an access road and parking areas. There is one existing tree, the remainder of the landscape being grass.
- 2.5. There are 29 trees within and around the site and seven tree/shrub groups. Details of the location and quality of existing trees can be found in the Arboricultural Impact Assessment (ABIA) by PJC Consultancy Ltd.
- 2.6. The area around the application site is residential in character, with residential properties located in all directions. The surrounding area includes flat blocks built in the mid 1900's and semidetached houses.
- 2.7. An aerial view of the Site is provided below.



Fig.1- Site red-line boundary in context of surrounding area

- 2.8. The site is in an area of relatively good accessibility to public transport. Gravesend Railway station is located around 1.8 miles away. To drive by car takes less than 10 minutes, there is also a bus stop located next to the site and the bus to Gravesend Railway Station takes only 15 minutes.
- 2.9. The Gravesend railway station has trains to and from London and Rainham.

- 2.10. The site is not located in a conservation area, nor does the Site contain any listed buildings. The Site is not within the setting of a conservation area or the setting of a listed building.
- 2.11. The site is not located in an Archaeological Priority Area.
- 2.12. The Environment Agency's Flood Zone Map indicates that the site within Flood Zone 1 and therefore has the lowest probability of flooding.

Planning History

- 2.13. There is no recent application for the site, there was one minor application from 1995 relating to the erection of front entrance canopies.
- 2.14. There is one determined application in the immediate surrounding area. The details are outlined below:
- > **20190503** Open Space, St Patrick's Gardens, Gravesend, Kent, DA12 4AN. Erection of one, four-storey flat block with ancillary spaces, associated car parking, landscaping and improvements to existing children's playground. The flat block will contain a total of 23 affordable units including 7 no. x 1 bedroom rented flats and 16 no. x 2 bedroom rented flats.

Permitted: September 2019.

3.0 Pre-application Advice

- 3.1. In accordance with the National Planning Policy Framework (NPPF 2021), the Applicant has engaged with the Local Planning Authority (LPA) to ensure an integrated design process prior to submission of this planning application. The Applicant has also sought to engage with the local community through the online commonplace website and in person, the results of which are also summarised in section 4.
- 3.2. The applicant sought two rounds of pre-application advice. Details of the schemes presented at the two pre-applications, including an explanation of how the schemes evolved following pre-application feedback, can be found in the Design and access Statement by BPTW.

Gravesham Borough Council Pre-Application 01

- 3.3. The first pre-application meeting included comments from officers at Gravesham Borough Council as well as feedback from Design South East. The comments were received on 13.07.2021.

Principle of Development

- 3.4. The ambition to provide a more efficient layout with the provision of affordable housing and a higher quality public realm is supported in principle.

Design and Layout

- 3.5. Different options for the location and typology of the buildings should be explored. The placement of the buildings should facilitate the improvement of the quality of communal space and routes through the existing estate.
- 3.6. Permeability through the site is important and the amount of light and air let through the blocks could be increased to aid this.
- 3.7. The roof design of the proposed building should reflect the type of roofs found in the existing townscape.

Sustainability

- 3.8. Sustainability should be one of the key factors to drive the design strategy and site layout. Sustainable drainage systems (SuDS) should be incorporated into the scheme from the start.
- 3.9. The roof form of the proposed buildings should facilitate the achievement of the sustainability goals and make the best use of the orientation.

Access

- 3.10. The movement of pedestrians and cyclists should be analysed in detail. The design of the proposed access routes should be based on an understanding of which existing routes are used most.

Scale and Massing

- 3.11. The massing of the proposed buildings should be evolved to reflect the scale of the existing buildings within the estate and to provide visual interest.
- 3.12. When comparing the massing of the proposed development, to neighbouring developments, it should be noted that the nearby development of St Patrick's Gardens is different from the proposed scheme as it frames a larger public space and has a frontage on Valley Drive.

Typologies

- 3.13. Instead of only providing flatted development, there is an opportunity to provide different typologies such as houses and duplexes.

Ecology and Trees

- 3.14. Efforts should be made to retain the best of the existing mature trees on site. Clarity should be provided as to whether the loss of trees has been factored into the net zero carbon target of the project.
- 3.15. More details of the improvement of amenity areas that are retained on site should be provided.

Highways

- 3.16. There is no reason in principle for a highway objection for a development of the type proposed.
- 3.17. There must be adequate provision for on-site vehicle turning so that vehicles may enter and leave the site in forward gear.
- 3.18. Car parking spaces should provide cabling for electric vehicle charging with 10% provision of suitable plug-in stations now. The car parking should be broken up and integrated into landscaping of the Site.
- 3.19. Bicycle stores should have provision for charging electric bikes.

Gravesham Borough Council Pre-Application 2

- 3.20. A meeting with the Council's Planning Officers took place on 20th July 2022, there was also a Design South East Design Surgery on 14th September 2022. A written response was received in a letter with reference number: PRE20210086 which is summarised below:

Design and Townscape

- 3.21. The scheme was recognised as being an improvement on the previous proposal which was discussed at the design surgery. The buildings were seen to be responding sensitively to the site's sloping topography.

Access

- 3.22. Additional details should be provided concerning the new access road from Valley Drive located to the north of Block A. Clarity must be given as to whether the road would become the adopted highway and what its surfacing materiality is. Owing to the slope of this proposed road and the shift from soft to hard landscape, soft landscape incorporated into permeable paving should be considered here to prevent excessive water runoff.
- 3.23. It should be clarified whether the public right of way to the north of the Site, is to be maintained as a connective footpath. If so, then measures such as improved lighting would be required to ensure it is a safe and legible route.
- 3.24. Clarity is required as to how the shared footpaths within the site would link to and relate to the area surrounding the Site, such as St Patrick's Gardens, St Columba's Close and St Dunstan's Drive.

Amenity Space

- 3.25. The layout to Block B is well designed. Consideration should be given as to whether the green amenity space allocated to this block would better serve residents, if it were divided into private gardens for the flats on the ground floor. Division of the green amenity space into private gardens could design out potential antisocial behaviour.

- 3.26. The ground floor level units within building M01 should have direct access to private gardens
- 3.27. Improvements to the soft landscaping at St Patrick's Gardens should be included within the proposal. Improvements to the ground floor external areas of the existing buildings that are to be retained would be welcomed.

Standard of Accommodation

- 3.28. The proposed design and layout of Block A is supported. Block B appears to be a well-considered layout, with desk access, dual aspect units and cross ventilation.
- 3.29. The buildings T01 and Block B should be designed so that there is a suitable window-to-window relationship with the existing properties on St Columba's Close. The proposals should be designed to ensure that there are no overlooking issues with existing neighbouring buildings.
- 3.30. The provision of maisonettes in buildings M01, rather than single family dwellinghouses as was originally proposed, is supported as this would provide future occupiers with a higher standard of accommodation.

Supporting Information for the Application

- 3.31. Indicative plans showing cross sections with all land level changes and relationships to the surrounding buildings are required.
- 3.32. It will be necessary to conduct an unexploded ordinance survey of the site.
- 3.33. The proposal must accord with Gravesham Borough Council's waste strategy, parks and open space, and highways and parking standards.

Response to Pre-Application Feedback

- 3.34. Details of how the design of the scheme has evolved in response to the pre-application feedback can be found in the Design and Access Statement by BPTW.

Community Consultation

- 3.35. The importance of community consultation is recognised, and the applicant has carried this out with the details outlined in section 4.

Kent Police

- 3.36. A meeting was held with a Designing Out Crime Officer from Kent Police using Microsoft Teams on 19.10.2022. The Officer made the following comments:
- > The proposed amenity spaces provide natural surveillance to the estate.
 - > The proposed car parking spaces are well overlooked which provides them with natural surveillance and reduces the risk of crime.
 - > Traffic control measures are not required on the proposed new road that leads from Valley Drive into the application site. This is because the proposed pavement and defensible space in front of the new buildings provides a safe access route for pedestrians.
 - > Access to the proposed dwellinghouses in block T01 should be from the front or sides of properties, not from the rear amenity spaces.
 - > The size, height and position of the fenestration and doors of the proposed homes do not present any security risks. Details of the standards and security ratings of the doors and windows can be decided following the determination of the planning application.

- > Enhancements to the security measures for the proposed cycle parking storage were suggested.

3.37. The Officer's guidance has been incorporated into the design proposal.

3.38. The Kent Police are consultees on the planning application. Therefore, they will be given opportunity to make an official representation following the validated application.

Gravesham Borough Council

4.0 Community Consultation

- 4.1. Two community consultation events took place on the site. Details of the consultation boards used to inform attendees of the nature of the proposals can be found in the Design and Access Statement by BPTW. A summary of the schemes presented at the events and the feedback received is provided below.

First Community Consultation

- 4.2. The first resident consultation event took place on the 4th February 2022; this included a board on landscape ideas that could be incorporated in the scheme, to see which ideas residents were keen to have.
- 4.3. Key findings from the consultation were as follows:
- > Provision of play area(s) for children and the provision of outdoor gym equipment were supported.
 - > Some residents supported the creation of a communal garden.
 - > The existing ground floor residents wanted to see low level defensible planting around the existing blocks.
 - > Residents were keen to see landscape improvements that would encourage biodiversity.

Second Community Consultation

- 4.4. The second resident consultation event took place on 7th October 2022. This event provided residents with an overview of new buildings proposed, the proposed housing typologies, and the landscape improvement to the existing amenity space.
- 4.5. Detailed information on the consultation can be found in the More information on this can be found in the Statement of Community Involvement by Comm Comm UK and in the Design and Access Statement by BPTW.
- 4.6. Key findings from the consultation were as follows:
- > There was support for the provision of new homes, as this would improve security on the estate due to additional activity and natural surveillance.
 - > The landscape improvements to existing amenity areas were supported, particularly the play space and the outdoor gym.
 - > The provision of car parking was raised as a concern. Since receiving this feedback, the design team have made rearrangements to proposed road layout to provide more carparking.
 - > Increased CCTV and lighting were requested to mitigate against anti-social behaviour.

5.0 Proposed Development

5.1. This section of the Planning Statement provides a detailed description of the proposed development. Further information is provided in the accompanying Design and Access Statement prepared by BPTW and the specialist reports submitted in support of this application.

5.2. This application seeks planning permission for the following description of development:

Demolition of Nos. 1 -12 St Patricks Gardens, Nos. 36 – 41 St Patricks Gardens, and Nos. 28 – 42 (even nos. only) St Columba's Close, and associated caretaker's facility. Erection of 2no. 2 storey buildings, 1no. 3 storey building and 1no. part3/part4 storey building to provide 46 residential dwellings (Class C3 residential use), with associated vehicle and pedestrian access, amenity space with hard and soft landscaping, car and cycle parking, refuse and recycling storage provision, and other associated works.

5.3. The development proposal as submitted responds to feedback given by Gravesham Officers in the pre-application response.

5.4. The proposed development will demolish three of the existing buildings containing 26 residential units and replace it with 4 buildings which will provide 46 units with the following mix.

Tenure	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Market	0%	0%	0%	0%
Intermediate	0%	0%	0%	0%
Social and Affordable Rent	32.6%	41.3%	10%	2%

5.5. Block A is a proposed part 3 storey /part four storey building comprising 20no. flats with the following unit mix.

Unit	Size	Storeys	Gross Internal Area
1	2 bedroom / 4 Person	Single	70.3 sqm
2	2 bedroom / 3 Person	Single	61.4 sqm
3	2 bedroom / 4 Person	Single	70.3 sqm
4	1 bedroom / 2 Person	Single	50.9 sqm
5	1 bedroom / 2 Person	Single	52.5 sqm
6	2 bedroom / 4 Person	Single	70.3 sqm
7	2 bedroom / 3 Person	Single	61.4 sqm
8	2 bedroom / 3 Person	Single	61.4 sqm
9	2 bedroom / 4 Person	Single	70.3 sqm
10	1 bedroom / 2 Person	Single	50.9 sqm
11	1 bedroom / 2 Person	Single	52.5 sqm
12	3 bedroom / 5 Person	Single	104.1 sqm
13	2 bedroom / 3 Person	Single	61.4 sqm
14	2 bedroom / 3 Person	Single	61.4 sqm
15	3 bedroom / 5 Person	Single	104.1 sqm
16	1 bedroom / 2 Person	Single	50.9 sqm
17	3 bedroom / 5 Person	Single	104.9 sqm
18	3 bedroom / 5 Person	Single	100.5 sqm

19	3 bedroom / 5 Person	Single	100.5 sqm
20	3 bedroom / 5 Person	Single	103.2 sqm

- 5.6. Block B is a proposed 3 storey building comprising 14no. flats with the following unit mix.

Unit	Size	Storeys	Gross Internal Area
1	2 bedroom / 3 Person	Single	62.2 sqm
2	1 bedroom / 2 Person	Single	51.3 sqm
3	1 bedroom / 2 Person	Single	51.3 sqm
4	2 bedroom / 3 Person	Single	62.2 sqm
5	2 bedroom / 3 Person	Single	62.2 sqm
6	1 bedroom / 2 Person	Single	51.3 sqm
7	1 bedroom / 2 Person	Single	51.3 sqm
8	1 bedroom / 2 Person	Single	51.3 sqm
9	2 bedroom / 3 Person	Single	62.2 sqm
10	2 bedroom / 3 Person	Single	62.2 sqm
11	1 bedroom / 2 Person	Single	51.3 sqm
12	1 bedroom / 2 Person	Single	51.3 sqm
13	1 bedroom / 2 Person	Single	51.3 sqm
14	2 bedroom / 3 Person	Single	62.2 sqm

- 5.7. Block M01 is a proposed 2 storey building comprising 6no. flats with the following mix.

Unit	Size	Storeys	Gross Internal Area
1	2 bedroom / 3 Person	Single	62.5 sqm
2	1 bedroom / 2 Person	Single	52.9 sqm
3	2 bedroom / 3 Person	Single	62.5 sqm
4	2 bedroom / 3 Person	Single	70.0 sqm
5	1 bedroom / 2 Person	Single	60.0 sqm
6	2 bedroom / 3 Person	Single	70.0 sqm

- 5.8. Block T01 is a proposed 2 storey building with bedrooms in the roof comprising 6no. houses with the following mix.

Unit	Size	Storeys	Gross Internal Area
1	4 bedroom / 6 Person	Three	115.6 sqm
2	3 bedroom / 5 Person	Three	104.5 sqm
3	3 bedroom / 5 Person	Three	104.5 sqm
4	3 bedroom / 5 Person	Three	104.5 sqm
5	3 bedroom / 5 Person	Three	104.5 sqm
6	4 bedroom / 6 Person	Three	115.6 sqm

Layout and Use

- 5.9. The layout has been developed following the careful analysis of the site in collaboration with the Council. The features of the site layout can be summarised as follows:

- > Demolition of three existing buildings
- > Construction of a 3-storey building, a part-3/part-4 storey building and 2no. 2-storey buildings;
- > Private amenity space for each dwelling;
- > Landscaped communal amenity space

Design

- 5.10. The proposed development will consist of 2no. 2 storey buildings, 1 no. 3 storey building and 1no. part3/part4 storey building.
- 5.11. The design approach responds to the scale and urban grain of the retained buildings within the estate and the buildings within the wider townscape. It defines the open space within the estate and provides active frontage onto Valley Drive to complement the adjacent Bishop's Court development. Through their scale and detailed design, the proposed terraced houses and maisonettes activate a traditional street frontage within the site.
- 5.12. A proposed vehicular access road provides direct access from Valley Drive and improves connections through the site. This will be the primary vehicular access route into the site. The existing access road from St Patrick's Gardens will be retained to be used by the existing and new homes within the estate, particularly by proposed block A residents,

Housing Quality and Mix

- 5.13. The scheme provides 46 units, and the unit mix is set out in the tables above.
- 5.14. All the proposed units meet the Nationally Described Space Standards. Each unit is provided with private amenity space and combined with the proposed communal amenity space provision, each unit meets the minimum amenity space standards set out in Gravesham's Residential Layout Guidelines SPG2. 85% of the units would be dual aspect.

Landscaping

- 5.15. The proposed scheme includes improvements to the outdoor amenity space within the estate. New communal amenity space including a play area and an outdoor gym are provided.

Parking, Refuse and Servicing

- 5.16. Blocks A and B both have secure refuse stores, which can be collected from the new access road. The refuse collection from the terraced houses will also be along the new access road.
- 5.17. The proposal provides 26 new car parking spaces for the proposed residential units.
- 5.18. There will be 60 proposed cycle parking spaces as part of the development. There will be external cycle stores for the flat blocks which will be located close to the rear entrances, and close to the access road for ease of access.
- 5.19. There are two cycle spaces for each of the houses in their rear gardens with additional cycle spaces, available for the larger houses, in the communal cycle stores behind Block A.

Energy

- 5.20. Sustainability is a key focus of the design, and 'Part L Plus' scheme is proposed for the Site. The Sustainability and Energy Statement that accompanies this application provides further details on this topic.

6.0 Planning Legislation and Policy Framework

- 6.1. This section outlines the relevant development plan policies and material considerations, to aid the subsequent discussion of how the proposal meets these requirements.

Local Development Plan

- 6.2. The development plan for the area comprises the following:
- > Gravesham Local Plan Core Strategy (2014)
 - > Gravesham Local Plan First Review- Saved Policies
 - > Gravesham Site Allocations and Development Management Policies

Site Designations

- 6.3. The Local Plan Policies Map does not show the site contravening any policies.
- 6.4. According to the Environment Agency's Flood Zone Maps, the site is in Flood Zone 1 (low risk of flooding).

National Planning Policy and Guidance

- 6.5. Regard has been given to the following national planning policy and guidance:
- > The National Planning Policy Framework (2021)
 - > The National Planning Practice Guidance (2018, as amended)

NPPF (2021)

- 6.6. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England, and how these are expected to be applied and taken into consideration in planning decisions. The following policies are considered most relevant to this application.

Chapter 2: Achieving sustainable development

- 6.7. At the heart of the NPPF is a 'presumption in favour of sustainable development'.
- 6.8. **Para.11** states that for decision-taking, this means:

(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Chapter 4: (Decision-Making) contains:

- 6.9. **Para. 47** asserts that planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on

applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

- 6.10. **Para. 48** states local planning authorities may give weight to relevant policies in emerging plans according to:
- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Chapter 5: Delivering a Sufficient Supply of Homes

- 6.11. The NPPF requires a local housing needs assessment to be conducted using the standard methodology and sets out that the Local Planning Authority should apply the weighted test set out in paragraph 11 (d) unless it can demonstrate a five-year supply of deliverable housing sites.
- 6.12. **Para. 60** states: “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 are addressed and that land with permission is developed without unnecessary delay.”
- 6.13. **Para. 63** states: “Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) The agreed approach contributes to the objective of creating mixed and balanced communities”.

Chapter 8: Promoting Healthy and Safe Communities

- 6.14. **Para. 92** states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction.
- 6.15. **Para. 92c** further states that the aim to: “...enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Chapter 9: Promoting Sustainable Transport

- 6.16. **Para. 110** states that when considering development proposals, it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.
- 6.17. **Para. 111** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residential cumulative impacts on the road network would be severe.

Chapter 11: Making Effective Use of Land

- 6.18. **Para 120.d** states that that planning policies and decisions should: “promote and support the development of under-utilised land and buildings, especially if these would help meet identified needs for housing where land supply is constrained, and available sites could be used more effectively...”
- 6.19. **Para. 122** states that planning policies decisions need to reflect changes in the demand for land and should be informed by regular reviews. It further states: “Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:
- a) It should as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs; and
 - b) In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.
- 6.20. **Para. 125.c)** states that: “Local Planning Authorities should refuse applications which they fail to make efficient use of land, taking into account the policies in the NPPF. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”.

Chapter 12: Achieving well-designed places

- 6.21. **Para. 130** states that planning decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate landscaping; they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and development should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

- 6.22. **Para. 153** asserts plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 6.23. **Para. 154** states new development should be planned for in ways that:
- (a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - (b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the government’s policy for national technical standards.
- 6.24. **Para. 161** says all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:
- (a) applying the sequential test and then, if necessary, the exception test as set out below;

(b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

(c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and

(d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

6.25. **Para. 167** states when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

(a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

(b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

(c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

(d) any residual risk can be safely managed; and

(e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

6.26. **Para. 169** asserts major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

(a) take account of advice from the lead local flood authority;

(b) have appropriate proposed minimum operational standards;

(c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

(d) where possible, provide multifunctional benefits.

Local Planning Policy

6.27. The scheme has been informed and guided by national and local planning policy documents. These include:

- > Technical housing standards - nationally described space standards
- > National Planning Policy Framework
- > Gravesham Local Plan Core Strategy (Adopted September 2014)
- > Gravesham Local Plan First Review (1994) (Saved Policies 2007)
- > Gravesham SPG- SPG2 Residential Layout Guidelines including Housing Standards Policy Statement 2015 (adopted 1996- amended 2020)

6.28. The LPA are reviewing their Core Strategy and adopting a Site Allocations and Development Management Policies Document. The Issues and Options Drafts of each document were published for public consultation which ran between October and December 2020.

- 6.29. The development plan policies relevant to the consideration of this application are as follows:
- > CS01 - Sustainable Development
 - > CS02- Scale and Distribution of development
 - > CS10 - Physical and Social Infrastructure
 - > CS11 – Transport
 - > CS12 - Green Infrastructure
 - > CS13 - Green Space, Sport and Recreation
 - > CS14 - Housing Type and Size
 - > CS15 - Housing Density
 - > CS16 - Affordable Housing
 - > CS18 - Climate Change
 - > CS19 - Development and Design Principles
- 6.30. The Gravesham Local Plan Core Strategy was adopted in 2014. The following policies are particularly relevant:
- 6.31. **Policy CS02 (Scale and Distribution of Development)** sets out the Borough's need for housing over the plan period (up to the year 2028) and finds a need for at least 6,170 new dwellings over the period. It also stated that at least 363 dwellings were required per year for the period 2019/20 to 2023/2024.
- 6.32. The policy prioritises development in the urban area as a sustainable location for development. It aims to do this by promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area.
- 6.33. **Policy CS10 (Physical and Social Infrastructure)** states where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure.
- 6.34. **Policy CS11 (Transport)** states that there should be sufficient parking in new development, in accordance with adopted parking standards and should reflect the availability of transport and accessibility to services and facilities in the area.
- 6.35. It also states that the Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate, these should provide improved access to Gravesend Town Centre and Ebbsfleet and to other services and cycle links in the Borough. In particular, the Council will seek the provision of pedestrian and cycle links between Northfleet and Ebbsfleet stations and along the river Thames, as part of the proposed Thames Estuary Path.
- 6.36. **Policy CS12 (Green Infrastructure)** asserts that there will be no net loss of biodiversity in the Borough and opportunities to enhance, restore and recreate and maintain habitats will be sought especially within the Biodiversity Opportunity Areas. It also states that where a negative impact on a protected or priority habitats/species cannot be avoided within development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.
- 6.37. **Policy CS13 (Green Space, Sport and Recreation)** states the Council will seek to make adequate provision and to protect and enhance the quantity, quality and accessibility of green space playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.
- 6.38. **Policy CS14 (Housing Type and Size)** requires new housing development to provide a range of dwelling types and sizes taking into the account existing character and need in the area.

- 6.39. **Policy CS15 (Housing Density)** asserts that the Council wants land to be used efficiently, whilst delivering the right type of housing to meet the needs of the whole community in the right location. Appropriate densities will vary across the borough but a minimum density of 40 dwellings per ha will be sought in the urban area. In suitable locations closer to the transport hub of Gravesend Town Centre, higher densities will be sought. Development proposals that do not make efficient use of land for housing, with regard to the character and location of the area, may be refused planning permission.
- 6.40. **Policy CS16 (Affordable Housing)** states that the provision of affordable housing will be required on new housing developments of 15 dwellings or more on sites of 0.5 ha or more in the urban area. The quantity of housing provided by private housing development sites above the threshold will be 30% in the urban area.
- 6.41. The Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.
- 6.42. Development will be subject to site viability and a tenure mix necessary to meet local needs and achieve a sustainable and socially inclusive development.
- 6.43. Provision should meet the definition of affordable housing set out in annex 2 of the NPPF.
- 6.44. Numbers, type and tenure is required as well as the occupancy criteria and how that will be enforced.
- 6.45. **Policy CS18 (Carbon Reduction)** assert the Council will seek to reduce the overall carbon footprint of the Borough. With regards to development this requires proposals for the development of Key Sites throughout the Borough and other major development elsewhere in the Gravesend Town Centre Opportunity Area, to consider the potential and include proposals for low carbon and renewable energy generation, including combined heat and power. If applicants opt not to do so they must submit evidence demonstrating that compliance is not technically or financially feasible, or that improved fabric energy efficiency or an allowable solution results in improved carbon saving benefits.
- 6.46. The policy refers to flood risk when it states that areas in risk of flooding must have a Flood Risk Assessment and a Flood Risk Management Plan (if required). Planning permission will be refused if schemes do not pass the sequential or exception tests.
- 6.47. Water Demand Management seeks to manage the supply of water in the Borough and reduce the impact of new development on the supply of potable water where possible. All new homes to be built should ensure that the consumption of water does not exceed 105* litres per person per day.
- 6.48. **Policy CS19 (Development and Design Principles)** requires new development to encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities, encourage sustainable travel, enhance Green Grid links and encourage healthier lifestyles.
- 6.49. New developments will use the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design. The design, layout and form of new development will be derived from a robust analysis of local context and character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings.
- 6.50. Where required by a planning permission, the design of new dwellings shall accord with shall accord with requirement M4 (2) (accessible and adaptable dwellings) of Part M (access to and use of buildings) of Schedule 1 to the Building Regulations 2010 (2015 edition). Furthermore, that new development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users.
- 6.51. New development will provide appropriate levels of private and public amenity space.

- 6.52. Car parking will be well related to the development it serves.
- 6.53. Strategy requires that new development will encourage sustainable living through a mix of uses including encouraging sustainable travel, enhancing Green Grid links and encouraging healthier lifestyles.
- 6.54. The design and layout of new development should take advantage of opportunities to build in resilience to the effects of climate change, including protection against flood risk.
- 6.55. Requires new development to be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, where required by a planning permission, the design and construction of new dwellings shall accord with requirement M4 (2) (accessible and adaptable dwellings) of Part M (access to and use of buildings) of Schedule 1 to the Building Regulations 2010 (2015 edition).
- 6.56. New development will be located, designed and constructed to:
- 6.57. Safeguard the amenity, including privacy, daylight and sunlight of its occupants and those of neighbouring properties and land.
- 6.58. Avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination.
- 6.59. New development will incorporate appropriate facilities for the storage and recycling of waste.
- 6.60. Not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems.
- 6.61. The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines where the Guidelines fall within the nationally described space standards.
- 6.62. New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure.
- 6.63. Design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use.

Gravesham Local Plan First Review (1994) (Saved Policies 2007)

- 6.64. **Policy T1** states that the Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.
- 6.65. **Policy T9** states that the Borough Council will expect the highway layout of new residential developments to comply with the Kent Design Guide and the Vehicle Parking Standards, but in appropriate circumstances will encourage the use of "Traffic Calming" measures in consultation with the Kent County Council as Highway Authority.
- 6.66. Electric Charging Points the LPA will expect at least 20% of the development to have electric charging points. - will encourage the use of sustainable and environmentally friendly forms of transport in accordance with CS11, 18 and 19 of the Core strategy LP (Extract from St Patrick's decision notice)

- 6.67. **Policy P3** asserts that the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates.

Supplementary Planning Documents and Guidance

- 6.68. The Council has prepared and adopted several supplementary Planning documents to provide further guidance on policies set out in Local Plan Documents. These include the following:

- > Residential Layout Guidelines SPG2
- > Kent Design Guide
- > SPG4: Kent Vehicle Parking standards (July 2006)
- > Kent Development Contributions Guide (March 2007)

Residential Layout Guidelines SPG2

- 6.69. Guidelines relating to privacy distances and overshadowing.
- > All applications for new dwellings (including flats) will be expected to comply with the Borough Council's privacy distances and guidance on overshadowing. The standards specified protect the privacy and amenity of the occupiers of existing and proposed dwellings, and protect against loss of light and overshadowing from obstructing buildings.
 - > To protect against overshadowing, all applications for residential development will be expected to comply with the 25o rule.
 - > First, draw a section in plane, perpendicular to each affected main window wall of the existing building. From the centre of the lowest window, from the horizontal, measure an angle of 25o. If any part of the new development obstructs the 25o line, overshadowing and loss of light may occur.
- 6.70. Guidelines relating to private and communal amenity space:
- 6.71. In any new building, space about buildings should be provided appropriate to the area and type of unit. This is in addition to any space required under vehicle parking standards, and for drying grounds, footpaths and access ways internal to the layout.

- 6.72. Minimum areas for private amenity space for new dwellings:

Accommodation with:	Minimum garden area (sqm)	Minimum depth from rear wall of house (metres)
1-2 bedrooms	37.2	7.6
3 bedrooms	60.0	10.0
4 or more bedrooms	100.0	10.0

- 6.73. For communal flats, a communal garden area equivalent to a minimum of 10 sqm shall be provided for amenity space.

- 6.74. For self-contained units (not necessarily communal) which have two or more bedrooms and can provide family accommodation, an area of amenity space in excess of 10 sqm will be expected. Such amenity space shall be of sufficient size to accommodate the following activities:
- > Children's play space
 - > Drying area
 - > Limited outside storage
 - > Sitting out
 - > General leisure use
- 6.75. Residential space standards:
- > The minimum floorspaces for double bedrooms and single bedrooms will no longer apply at 11.2 sqm and 6.5 sqm respectively, these are less than the nationally described space standards of 11.5 sqm and 7.5 sqm.
 - > The minimum floorspaces for living rooms, dining rooms, kitchens, kitchen/diners, lounge/diners, bathrooms and WCs, bathrooms only, WCs only, bedsits, and hallways & landings will no longer apply as there is not an equivalent national standard.
- 6.76. 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.
- 6.77. In addition, a minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden is defined as the first five metres of garden adjacent to the rear of the dwelling.
- 6.78. For 'single aspect' dwellings, the minimum distance from the window of a habitable room to any house wall of equivalent height containing no habitable room windows can be reduced to 11 metres.
- 6.79. Kent's Design Guide suggest that the design of new developments should be based on a network of linked spaces.

Housing Standards Policy Statement October 2015

- 6.80. Policy states that where required by planning permission, design and construction of new dwellings shall accord with requirement M4 (2) (accessible and adaptable buildings) of Part M (access to and use of buildings) or Schedule 1 to the Building Regulations 2010 (2015 edition).

7.0 Planning Considerations

- 7.1. This section provides an assessment of the development proposal in relation to the planning policies, guidance and material considerations set out in Section 6. Where relevant, it draws upon other technical documents submitted as part of this planning application.

Principle of Development

Demolition

- 7.2. The demolition of three existing buildings within the estate and the associated caretaker's facility would allow for a comprehensive redevelopment of the site. The proposed redevelopment optimises the number and sizes of affordable homes within the Site and provides a scheme of high-quality communal amenity space for both existing and future residents to enjoy.
- 7.3. Significant improvements in both pedestrian and vehicular accessibility within the existing estate are achieved through the proposed development. More clearly defined, useable and secure communal amenity spaces are provided. The proposed alterations to the existing footpath that connects Valley Drive and St Columba's Close creates improved natural surveillance. The demolition of the existing caretaker facilities (re-provided within the proposals) allows for further enhancements to the communal amenity space.

Optimisation of Residential Units

- 7.4. Policy CS02 (Scale and Distribution of Development) sets out the Borough's need for housing over the plan period (up to the year 2028) and finds a need for at least 6,170 new dwellings. It also states that at least 363 dwellings are required per year for the period 2019/20 to 2023/2024. The policy also prioritises development in the urban area as a sustainable location for development, it aims to do this through promoting regeneration by prioritising the redevelopment and recycling of underused derelict and previously developed land in the urban area. The application site is an urban site in a sustainable location. Due to the scale and layout of the existing buildings within the estate, the application site provides an opportunity to optimise the number of affordable homes on this area of previously developed land. The proposal provides a net increase of 20 dwellings within the estate while improving the access and amenity space enjoyed by existing residents.
- 7.5. The application site is included within the Strategic Land Availability Assessment (SLAA) (2020) under site reference GB145. With the SLAA (2020) the Site is a promoted site and its suitability and achievability was given an orange RAG rating and the availability a green RAG rating. The SLAA (2020) states the Site can provide 16 new units. The site is also included within Regulation 18 Part 1: Emerging Local Plan Core Strategy Partial Review and Site Allocations and document states that the site can provide 15 additional units. The number of new residential units that these documents state the Site can provide is fewer than the 20 units this proposed scheme provides. It should be noted however, that these documents do not account for the way in which the number of proposed units on the Site can be optimised through the demolition of the some of the existing buildings within the estate and the erection of new buildings that integrate into the estate's existing layout. In addition, these documents carry limited weight in the decision-making process as they are draft documents at the regulation 18 stage consultation stage.
- 7.6. The proposal optimises the number of affordable homes on the Site through a design that respects the character of the existing estate and the wider townscape and provides a high standard of accommodation to future residents. The scheme is designed to protect the amenity of the existing residents within the estate while improving their standard of accommodation through the newly designed amenity space and access routes. For these reasons, the proposal makes an efficient use of land and provides new homes at a suitable housing density, in line with policy CS15.

- 7.7. Details of each element of the proposal and the public benefits that the scheme provides are set out within this section of the planning statement.

Design and Townscape

- 7.8. The design team have evolved the proposals in a positive manner in response to pre-application feedback. In line with Policy CS19 the design of the new development has been derived from local context and character and makes a positive contribution to the street scene, public realm and local townscape.
- 7.9. The proposal provides a part three storey / part four story block of flats, a three-storey block of flats, a two-storey block of maisonettes, and a two-storey row of terraced dwellinghouses. The scale of the proposed buildings has been designed with reference to the massing and layout of the existing buildings within the estate, to allow the proposal to provide a gentle increase in residential density. The scale and detailed design of the proposed buildings complements the character of the existing estate.
- 7.10. There is a variation in building typology and heights in the area surrounding the estate. The site is located at a junction of low-level semidetached homes and taller flat blocks. The massing of the proposed buildings has been designed with consideration of the existing surrounding context. While the proposed buildings have a greater massing than those that they replace, they are designed to a scale that respects the character of the existing street scene. The detailed design of the proposed building reads as a natural evolution of the design of the 20th century buildings in the local area.
- 7.11. The massing of Block A has been designed to be viewed alongside the adjacent Bishops Court development and semi-detached houses to the north. Therefore, the central form of the building is 4 storeys, dropping down to 3 storeys towards the south and the north. Block A compliments the Bishops Court development and reads as a natural addition to the street scene.
- 7.12. Maisonette block M01 and Terrace T01 are located either side of the new road and complete the existing urban grain of the adjacent houses on St Columba's Close and communal amenity space enclosed by the adjacent three flat blocks. The massing of both buildings is therefore kept relatively low at two storeys. The buildings are staggered to reflect the changing topography of the site. Due to their scale and detailed design, Block M01 and Terrace T01 provide a traditional street character that is in keeping with the character of the local area.
- 7.13. The massing of Block A considers the adjacent flat blocks on St. Patrick Gardens and is therefore proposed to be 3 storeys high, however staggered in two to reflect the changing topography of the site.
- 7.14. The impact of the proposal on the views from the surrounding streets will be minimal, the development is within a pocket of development and so any changes to the views from the surrounding streets and also mid-range views from the surrounding neighbourhood will be negligible. The scale of the development will therefore be appropriate in this setting.
- 7.15. For the reasons set out above, the proposal accords with Policy CS19.

Siting and Layout

- 7.16. The layout of the proposal creates a community consisting of homes within a high-quality landscaped setting. Routes are provided to ensure safe and direct access to the existing and proposed homes for both pedestrians and vehicles.
- 7.1. The proposed scheme includes improvements to the existing gardens and homes with increased planting to frontages and the communal areas. The re-provision of the existing caretaker's facility within the proposed flat blocks provides further opportunity to enhance the quality of the communal amenity.

- 7.2. Blocks A and B both have secure refuse stores, which can be collected from the new access road. The refuse collection from the terraced houses will also be along the new access road also.
- 7.3. The siting and layout of the proposal would accord with Policy CS19, the Kent Design Guide and the Building for Life 12 policy guidance.

Residential Tenure, Mix and Quality

Tenure

- 7.4. All the proposed dwellings will be affordable social and affordable rented housing. The proposed units will be provided by Gravesham's housing team. 'Social Rent' and 'Affordable Rent' both meet the definition of affordable housing included in annex 2 of the NPPF (2021). As the proposal constitutes 100% affordable and housing the submission of a viability assessment is not required.
- 7.5. Under policy CS16 the Council seeks an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing. All the units are provided at affordable or social rent, so no intermediate housing is provided. It should be noted however, that policy CS16 also says that the tenure mix provided should be 'necessary to meet local needs'. The proposed social and affordable rented homes are provided to meet the needs of Gravesham Borough Council's Housing Register. Details of the local need are provided in the Affordable Housing statement by BPTW. As the proposed tenure of the units meets the need of Gravesham Borough Council's Housing Register, it is considered to accord with policy CS16.

Residential Mix

- 7.6. The following unit mix will be provided:

Dwelling Type	1- Bedroom 2-person	2- Bedroom 3- person	2- Bedroom 4- person	3- Bedroom 5-person	4- Bedroom 6- person	Total
Houses	0	0	0	4	2	6
Flats	15	15	4	6	0	40
Total	15	15	4	10	2	46
Dwelling size (%)	32.6 %	32.6 %	8.7%	21.7%	4.3%	100%

- 7.7. Policy CS14 (Housing Type and Size) in the Gravesham Local Plan Core Strategy requires new housing development to provide a range of dwelling types and sizes taking into account the existing character and need in the area. Policy CS16 states that the tenure mix of affordable homes should achieve a sustainable and socially inclusive development. The existing estate and the wider area are characterised by both family sized accommodation and smaller one-bedroom units.

The unit mix of the proposed affordable housing units meets the local need of those on Gravesham Borough Council's Housing Register, as set out in the Affordable Housing Statement provided by BPTW. The proposal provides a mix of both family sized units and smaller units, so the development creates a sustainable mix of dwelling types. The proposed unit mix reflects the character of the existing area and would allow social integration into the existing community. For these reasons, the proposed unit mix accords with policies CS14 and CS16.

Residential Accommodation Standards

- 7.8. All homes have been designed to meet or exceed the Nationally Described Space Standards in terms of overall unit sizes and the internal space standards of individual rooms and storage space in accordance with Policy CS19, Kent Design Guide, and Gravesham's Residential Layout Guidelines SPG2.
- 7.9. 85% of the proposed units are dual aspect and, in some cases, triple aspect. This ensures good daylight sunlight to all rooms and provide cross ventilation.
- 7.10. For the reasons set out above, the proposed homes would provide a high quality of accommodation for future residents.

Outdoor Amenity Space

- 7.11. Policy CS19 states new development will provide appropriate levels of private and public amenity space. The Residential Layout Guidelines SPG advises that flats should have 10 sqm of amenity space. This can be provided as communal amenity space, private amenity space, or a combination of both. Each flat has its own area of private amenity space. Blocks A and B both have communal amenity space allocated to the residents of the block. Block M01 has a large area of communal amenity space to the south that the occupiers can use, along with the occupiers of the proposed other blocks and the occupiers of the existing homes within the estate. As set out below, with the combination of the private and communal amenity space, each flat has in excess of 10sqm of amenity space.
- 7.12. The amount of private amenity space provided to each unit within Block A is set out in the table below.

Unit	Size	Proposed Amenity Space – Sqm
1	2 bedroom / 4 Person	8.1 sqm
2	2 bedroom / 3 Person	7.7 sqm
3	2 bedroom / 4 Person	8.1 sqm
4	1 bedroom / 2 Person	5.5 sqm
5	1 bedroom / 2 Person	5.5 sqm
6	2 bedroom / 4 Person	8.1 sqm
7	2 bedroom / 3 Person	8.0 sqm
8	2 bedroom / 3 Person	8.0 sqm
9	2 bedroom / 4 Person	8.1 sqm
10	1 bedroom / 2 Person	5.5 sqm
11	1 bedroom / 2 Person	8.0 sqm
12	3 bedroom / 5 Person	8.1 sqm
13	2 bedroom / 3 Person	8.0 sqm
14	2 bedroom / 3 Person	8.0 sqm
15	3 bedroom / 5 Person	8.1 sqm
16	1 bedroom / 2 Person	8.0 sqm
17	3 bedroom / 5 Person	8.0 sqm
18	3 bedroom / 5 Person	8.0 sqm
19	3 bedroom / 5 Person	8.0 sqm
20	3 bedroom / 5 Person	8.0 sqm

- 7.13. The amount of communal amenity space that is allocated to Block A is 310sqm. The amount of private amenity space in combination with the amount of communal amenity space provided to the block, results in each unit having in excess of 10 sqm of amenity space.
- 7.14. The amount of private amenity space provided to each unit within Block B is set out in the table below.

Unit	Size	Proposed Amenity Space – Sqm
1	2 bedroom / 3 Person	6.0 sqm
2	1 bedroom / 2 Person	5.0 sqm
3	1 bedroom / 2 Person	5.0 sqm
4	2 bedroom / 3 Person	6.0 sqm
5	2 bedroom / 3 Person	6.0 sqm
6	1 bedroom / 2 Person	5.0 sqm
7	1 bedroom / 2 Person	5.0 sqm
8	1 bedroom / 2 Person	5.0 sqm
9	2 bedroom / 3 Person	6.0 sqm
10	2 bedroom / 3 Person	6.0 sqm
11	1 bedroom / 2 Person	5.0 sqm
12	1 bedroom / 2 Person	5.0 sqm
13	1 bedroom / 2 Person	5.0 sqm
14	2 bedroom / 3 Person	6.0 sqm

7.15. The amount of communal amenity space that is allocated to Block B is 400sqm. The amount of private amenity space in combination with the amount of communal amenity space provided to the block, results in each unit having in excess of 10 sqm of amenity space.

7.16. The amount of private amenity space provided to each unit within Block M01 is set out in the table below.

Unit	Size	Proposed Amenity Space – Sqm
1	2 bedroom / 3 Person	6.1 sqm
2	1 bedroom / 2 Person	6.0 sqm
3	2 bedroom / 3 Person	6.1 sqm
4	2 bedroom / 3 Person	6.1 sqm
5	1 bedroom / 2 Person	6.0 sqm
6	2 bedroom / 3 Person	6.0 sqm

7.17. There is an area of communal amenity space located to the south of Block M01 that has a size of 1045 sqm. The amount of private amenity space in combination with the amount of communal amenity space the occupiers can make use of within the estate, results in the occupiers of each unit being able to enjoy in excess of 10 sqm of amenity space.

7.18. Under Residential Layout Guidelines SPG, the amount of amenity space required for single family dwelling houses should be provided in accordance with the number of bedrooms the dwellinghouse has. The table below shows bedroom numbers of the proposed dwellinghouses and the amount of recommended private amenity space in according to the SPG.

Unit	Size	Required Private Amenity – Required	Private Amenity Space – Provided
1	4 bedroom / 6 Person	100 sqm	110.3 sqm
2	3 bedroom / 5 Person	60 sqm	65.5 sqm
3	3 bedroom / 5 Person	60 sqm	65.5 sqm
4	3 bedroom / 5 Person	60 sqm	65.5 sqm
5	3 bedroom / 5 Person	60 sqm	65.5 sqm
6	4 bedroom / 6 Person	100 sqm	62 sqm

- 7.19. As shown above, all the proposed dwellinghouses meet the recommended private amenity space standards, except for one. It should be noted that in addition to their private amenity space, the proposed dwellinghouses all have access to communal amenity space within the estate. For this reason, despite the slight deficiency in the size of the private garden of one of the dwellinghouses, the future occupiers would still experience a high standard of residential accommodation.
- 7.20. Due to their sizes, location, layout, and design, both the proposed communal and private amenity spaces are high quality and useable in accordance with Policy CS19. Details of the amenity spaces can be found in the Design and Access Statement by BPTW and ME Landscape Studio.

Accessible Housing

- 7.21. In line with Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy where required by planning permission, the design of new dwellings shall accord with requirement M4 (2) (accessible and adaptable dwellings) of Part M (access to and use of buildings) of Schedule 1 to the Building Regulations 2010 (2015 edition). Furthermore, it requires that new development is fit for purpose and adaptable to allow changes to be made to meet the needs of users. Due to site topography, not all 46 units can meet the standard M4(2) but the applicant has maximised the number and considered the requirements in the design as carefully as possible. The applicant is happy for details of the proposed number of units that meet M4 (2) standards to be secured through a planning condition.

Neighbour Amenity Impact

Daylight and Sunlight Report

A daylight and sunlight report was undertaken by Waldrams and submitted in support of this application. The findings of the report are summarised below.

- 7.22. The report demonstrates that the proposed development would not have a noticeable impact on the majority of the surrounding properties. It provides two cases where there were noticeable impacts on habitable rooms in surrounding properties, were secondary windows serving kitchens which had a main window which would retain a high level of Vertical Sky Component (VSC) above the Building Research Establishment (BRE) guidelines' recommended 27% target.
- 7.23. Across the site, 87% of rooms would meet their target illuminance values for daylight and 100% of dwellings will have at least one room which meets for sunlight exposure. More rooms would meet the target daylight value were it not for the provision of balconies as private amenity space, resulting in an inevitable trade-off.
- 7.24. The overshadowing impact of the proposal on the amenity spaces of the existing neighbouring properties was assessed. The assessment found that all neighbouring amenity spaces would continue to receive in excess of 2 hours of sunlight on 21 March. The proposed amenity spaces within the scheme would have more than 50% of their areas receiving at least 2 hours of sunlight on 21 March. For these reasons, the proposal meets the BRE Guidelines target values for overshadowing.
- 7.25. The report demonstrate that the proposed homes would provide a high standard of accommodation to future residents and protect the amenity of existing neighbouring residents in accordance with Policy CS19.

Privacy, overlooking, outlook and overbearing impact

- 7.26. The design and distances between buildings have been designed to take into consideration Gravesham Residential Layout SPG guidance on distances.

- 7.27. The minimum distances between habitable windows and secondary windows are a key consideration that has informed the emerging layout. The position of the proposed buildings and the location and design of their fenestration and amenity spaces, has been designed to ensure compliance with the minimum separation distances specified in the SPG.
- 7.28. Due to the size, height, position and fenestration of the proposed buildings, the proposed scheme would not cause the occupiers of neighbouring and adjoining residential buildings to suffer a loss of outlook or privacy, and nor would they cause them to experience an overbearing impact. For these reasons, the proposal accords with Policy CS19.

Noise Assessment

- 7.29. The Gravesham Local Plan (Policy C19) states that development should not have an adverse environmental impact from pollution, including noise levels.
- 7.30. A Noise Impact Assessment Report, by Nova Acoustics, is submitted in support of this application. It presents the results of the environmental survey undertaken to measure prevailing background noise levels and outlines any necessary mitigation measures.
- 7.31. The Noise Impact Assessment Report sets out glazing specifications and states that all mechanical plants associated with the development should not exceed the cumulative plant noise limit level, and outlines any necessary mitigation measures.
- 7.32. The report sets out the glazing and ventilation specifications required to be proposed for the measured noise levels and it concludes that no further mitigation measures are required to protect the habitable rooms from external noise intrusion.
- 7.33. In light of the above, the proposed development complies with the policy objectives of the Local Plan Policy C19.

Environment

Ecology

- 7.34. A Preliminary Ecological Appraisal (PEA) has been prepared by Greenlink Ecology Ltd and has been submitted in support of this application. The PEA provides a commentary on the habitats and species present or potentially present, within the Site boundary and surrounding area. It provides an initial assessment of the possible impacts of the proposal on these habitats and species and then it recommends surveys to be carried out to provide more information about the existing species on the site and in the surrounding area. The PEA recommends that a survey should be carried out on bats to provide more information about the existing species on the site and surrounding area. The Bat Survey Report prepared by Greenlink Ecology Ltd is included with the submission documents.
- 7.35. The PEA and Bat Survey made the following conclusions and recommendations:
- > There is no significant risk of impacts to bats associated with the proposals, mitigation measures are not considered necessary for the bats.
 - > The PEA concluded that the site contains common/widespread habitats that are not of conservation concern and impacts of these habitats are considered insignificant.
- 7.36. The PEA addresses the policy requirements of Policy CS12 by ensuring that there will be no net loss of biodiversity in the borough and development will not have a negative impact on protected or priority habitats/species.

Trees

- 7.37. An Arboricultural Impact Assessment (ABIA) by PJC Consultancy Ltd has been provided to assess the impact of the proposed works on trees in and adjacent to the application sit. The ABIA identified 29 trees within and around the site and seven tree/shrub groups. Trees are categorised from category A (highlights retention value to Category Y (no retention value). Of the 29 trees surveyed 6 were category B trees, 18 were category C, and 5 were category Y. Of the 7 tree groups surveyed 1 was category B, 5 were category C and 1 category Y.

Landscaping

- 7.38. Details of the proposed scheme of hard and soft landscaping are provided in the Design and Access Statement by BPTW and ME Landscape Studio.
- 7.39. The proposed scheme of landscaping requires the removal of 7 trees (1 category B and 6 category C) and 2 groups but includes the provision of approximately 48 new trees to replace them. This represents an approximate ratio of 5 new trees to 1 tree removed. The proposed trees consist of range of native and non-native trees, including small and medium-sized trees to suit the urban context.
- 7.40. The proposed methods of ecological enhancement of the Site are provided, including an explanation of how the proposal could have a positive impact on bats and breeding birds. An outline of a landscape management plan is provided in the Design and Access Statement which includes its key objective. The management of the landscaping would facilitate its successful integration into the existing estate and ensure alignment with the long-term nature conservation interests.
- 7.41. The proposed scheme of hard landscaping has been coordinated with the SuDs strategy. Permeable materials to facilitate drainage are incorporated where achievable, given the constraints of below ground services.
- 7.42. A range of boundary treatments are proposed, to provide physical separation to private gardens/ terraces and to control access to resident areas for safety and security.
- 7.43. For these reasons, the proposed landscaping scheme is in accordance with policies CS12 and CS19.

Energy + Sustainability

- 7.44. A sustainability statement prepared by KLH sustainability is submitted in support of this application. The strategy set out within this report is:
- > The roofs of the buildings have been designed to support Photovoltaic panels (PV) in the future.
 - > Mechanical ventilation with heat recovery (MVHR) is proposed to supply fresh air to all residential units.
 - > Domestic Hot Water (DHW) storage is proposed with appropriately sized, well-insulated tanks for each of the residential units.
 - > Efficient LED lighting throughout the development.
 - > Materials with low carbon intensity and recycled contents are prioritised throughout the development site.
 - > Increased number of trees to help mitigate for increasing temperatures.
 - > A Building Regulations England Part L (BREL) Compliance report was carried out and the proposals complied with these building regulations.
- 7.45. The site-wide results on carbon emissions, indicated a carbon reduction of 57.2% a year. Considering the above, the proposed development complies with policy CS18 of the Local Plan

Flood Risk

- 7.46. The proposed development has an area of 1.079 hectares and so requires a Flood Risk Assessment. Site Ridge and Partners LLP have prepared a Flood Risk Assessment to support the planning application for the proposed redevelopment of St Columba's Road in Gravesend. The report is summarised below.
- 7.47. The Flood Risk Assessment has taken into account national, and local planning policy and guidance to consider all potential sources of flooding to the site.
- 7.48. The site is located in Flood Zone 1 and is demonstrated to be at a low probability of flooding from fluvial sources.
- 7.49. Flood risk to the Site from other potential sources such as surface water and sewers is low. The risk of groundwater flooding on the Site is high.
- 7.50. Based upon the initial appraisal of flood risk, mitigation measures would be required to manage residual flood risks to the Site. However, it is considered that the recommended mitigation measures (i.e. elevation of finished floor levels etc., groundwater level monitoring) are readily deliverable and would not unduly hinder or prevent the redevelopment of the Site for residential use.
- 7.51. The Site has no recorded history of flooding from fluvial or other sources.
- 7.52. The Site is entirely within Flood Zone 1 and with the appropriate mitigation measures should readily satisfy the requirements of the Sequential Test as no reasonably available alternative sites, at a lower risk of flooding are expected to be identified. There is no requirement for the proposed development to be subject to the Exception Test.
- 7.53. Surface Water generated from the proposed development will be managed in a sustainable manner in accordance with the guidance in the Construction Industry Research and Information Association (CIRIA) SuDS Manual and at source.
- 7.54. The foul water generated from the development is proposed to discharge into the existing Southern Water manhole. An agreement is to be put in place to connect the pipe to the existing Southern Water network.
- 7.55. The Flood Risk Assessment concludes that the immediate and residual flood risks over the lifetime of the development are readily manageable, and the redevelopment proposals are deemed acceptable in terms of flood risk throughout their lifetime, without increasing flood risk elsewhere. For these reasons, the proposal is in accordance with policy CS18 and CS19.

Contaminated Land Assessment

- 7.56. A Land Contamination Assessment has been carried out by the RPS Group which has assessed the impacts of the development. The report is summarised below.
- 7.57. Within areas of proposed private gardens, it is considered that Polycyclic Aromatic Hydrocarbon (PAH) contamination will pose a risk to future site users which should be mitigated via source removal (removal of Made Ground) or installation of clean cover.
- 7.58. There is no significant risk posed to future site users within areas of proposed hard standing or public open space, or to off-site human health receptors.
- 7.59. It is not considered that the relatively low levels of contaminants of concern encountered within the Made Ground soils, will pose a significant risk to the underlying aquifer which is anticipated to be present at significant depth.

- 7.60. The report recommends that a site-specific Remediation Strategy incorporating Validation Plan and protocols for managing any contamination encountered during redevelopment is produced. The Remediation Strategy should include details of the covers systems required in areas of soft landscaping. There is the potential that soil and groundwater contamination that has not been previously identified will be encountered during the development phase and therefore a discovery strategy should be included as part of the Remediation Strategy. The applicant is happy for this Remediation Strategy to be secured through a planning condition. For the reasons outlined above the proposal complies with policies CS02 and CS19.

Unexploded Ordnance Assessment

- 7.61. An Unexploded Ordnance Assessment has been carried out for the Site by Fellows.
- 7.62. The Assessment has designated the Site as being at medium risk of air service munitions and low risk of British anti-air defensive munitions and other sources of munitions. The targeting of Gravesend by German bombing raids in WWII means there is a medium risk of encountering deep buried aerial unexploded ordnances.
- 7.63. The report makes the following recommendations to mitigate the potential risk from unexploded ordnance.
- > UXO Awareness Training – An Unexploded Ordnance Awareness Brief (UXOAB) should be delivered to all site personnel. This can also include a site safety walk-through and discussion of existing safety and emergency documentation.
 - > For piling and deep excavations, it is recommended intrusive magnetometer Cone Penetration Testing (CPT) to the maximum bomb penetration depth based for any piling or deep excavations is carried out within the site areas marked as medium risk. For deep open excavations (deeper than 2m below existing ground level) an unexploded ordnance engineer should be retained on-site to oversee groundworks.
 - > A site-specific emergency response plan (ERP) should be produced to provide clear and precise guidance on what to do should unexploded ordnance be encountered, and / or detonated as part of the site works. It should be accompanied by emergency management team roles and responsibilities. The ERP should be included in the health and safety plan for the proposed works and communicated to the work force at the operational level, typically as part of a toolbox talk.

- 7.64. The applicant can provide details of these mitigation measures through a planning condition.

Transport and Parking

- 7.65. The Transport Statement by SWECO examines the connectivity of the site on the impact of the proposal on the local highway network.

Accessibility

- 7.66. The site is integrated into the existing network of footways. There are good bus services which provide a connection to Gravesend railway station in under 15 minutes.
- 7.67. The proposed access is via a new access road which will be delivered as part of the proposed development. There are two existing fingers of public highway off Valley Drive being stopped up as they will no longer be required.

Car Parking

- 7.68. There are eight existing car parking spaces on the application site. These existing car parking spaces would not be modified or removed as part of the proposed development.

- 7.69. A total of 26 car parking spaces are proposed to support the proposed net increase of 20 dwellings on the site, at a ratio of 1.3 spaces per dwelling. The proposed level of car parking is supported by car ownership data from the 2011 Census for the local census zone in which the site is located. The data shows that the average level of car ownership in the area is 1.1 cars owned per household. The data extracted from the 2011 Census is presented in Appendix D of the Transport Statement by SWECO.
- 7.70. In addition, the proposed level of car parking for the proposal is supported by local context. For example, the residential development that was approved adjacent to the site at Bishop's Court (Application Ref: 20190503) had a car parking ratio of 1.1 spaces per dwelling, that was based on 23 dwellings and 25 car parking spaces.
- 7.71. For the proposed dwelling houses in block T01, one electric vehicle charging space would be provided per dwelling. For the proposed flats, 20% of car parking spaces would have active electric vehicle charging infrastructure at the outset and 80% would have passive provision to enable conversion to active provision at a later date.

Cycle Parking

- 7.72. Cycle parking spaces are provided in accordance with the minimum standards set out in the Kent Vehicle Parking Standards SPG 4 (July 2006). 60 cycle parking spaces are provided, 5% of which have charging infrastructure for electric cycles.

Trip Generation

- 7.73. An analysis of trip generation is provided for the proposed development, which concludes that the proposed development would not have a material impact on the transport networks surrounding the site.

Servicing

- 7.74. A Large Refuse Vehicle would be able to access the site, turn around on site and egress in forward gear on to Valley Drive. Evidence of this is provided in the swept path analysis of a Large Refuse Vehicle in Appendix E of the Transport Statement by SWECO.

Emergency Vehicle Access

- 7.75. A Fire Tender would be able to access the site, turn around on site and egress in forward gear on to Valley Drive. Evidence of this is provided in the vehicle swept path analysis is provided in Appendix E of the Transport Statement by SWECO.
- 7.76. The proposed development accords with national policies NPPF section 9, as well as the PPG and Local Policies CS11 and the KCC SPG4- Vehicle Parking standards. It also complies with Policy T1, T9 and P3 of the Gravesham Local Plan First Review 1994 (Saved Policies 2007).

Sewage and Surface Water Drainage Strategy

- 7.77. A surface and foul water drainage strategy has been prepared by Ridge for the development. The report is summarised below.
- 7.78. Foul water generated by the Site shall discharge to the southern public foul water sewer.
- 7.79. Surface water generated by the Site shall be discharged to ground through soakaways made of proprietary cellular storage units. Surface water will be managed within the application Site and as close to source as possible

- 7.80. Amenity and biodiversity benefits are to be provided through the proposed SuDS systems which will look to utilise, where practicable, a combination of water butts, rain gardens and tree pits.
- 7.81. The proposed development will present an overall increase in foul water volume and peak flow to the public sewer, which is directly comparable to the increase in units on the site.
- 7.82. The proximity of the site to the strategic Main Foul Sewer and intention to provide new foul water infrastructure throughout would suggest that this should not present a significant issue to the development, assuming enough capacity is present within the strategic sewer.
- 7.83. A capacity check/analysis should be progressed with Southern Water to ensure there is adequate capacity in the foul water network to accept the proposed flows.
- 7.84. For these reasons set out above, the proposal is in accordance with policies CS10 and CS18.

Utilities

- 7.85. The development will connect to local water, electricity and data infrastructure. Water connection will be provided to the proposed dwellings through Thames Water, who have confirmed there is capacity. Electrical connection will be provided by UKPN. The provision of a new substation will be considered and confirmed during the design development. High speed internet will be provided to all dwellings with connections made to the local BT fibre infrastructure. More information can be found in the Design and Access Statement by BPTW. The proposal is in accordance with policies CS10 and CS18.

Planning Obligations

- 7.86. A Planning Obligations Statement by BPTW has been provided in support of the application that sets out the required obligations and the suggested methods through which they are secured. A summary of the proposed planning obligations are as follows:
- > Strategic Access Mitigation and Monitoring Strategy (SAMMS) contribution;
 - > Financial contributions towards infrastructure; and
 - > Details of the proposed affordable housing.

8.0 Conclusion

- 8.1. This Planning Statement supports the submission of a full planning application to the Gravesham Borough Council for the following description of development:

Demolition of Nos. 1 -12 St Patricks Gardens, Nos. 36 – 41 St Patricks Gardens, and Nos. 28 – 42 (even nos. only) St Columba's Close, and associated caretaker's facility. Erection of 2no. 2 storey buildings, 1no. 3 storey building and 1no. part3/part4 storey building to provide 46 residential dwellings (Class C3 residential use), with associated vehicle and pedestrian access, amenity space with hard and soft landscaping, car and cycle parking, refuse and recycling storage provision, and other associated works.

- 8.2. In formulating the proposal, the design team have sought to make the most efficient and sustainable use of this Site.
- 8.3. The Applicant has engaged with the council officers throughout the pre-application process and has also conducted a community consultation.
- 8.4. In summary, this proposal will provide the following public benefits:
- > 46 new affordable and social rented homes built to a high quality in a sustainable location;
 - > Private amenity spaces for all of the proposed units
 - > Improvements to the existing and new communal amenity space within the estate for the use of existing and new residents including play equipment for younger children and an adult gym
 - > Cycle Parking and Car Parking to aid the sustainability and usability of the development proposal;
 - > The proposed homes are designed to mitigate against flood risk; and
 - > A highly energy efficient and sustainable development achieving a significant carbon reduction.
- 8.5. Overall, it is concluded that this submission meets or exceeds the planning policy requirements set out in national policy, and the Borough of Gravesham's Local Plan Policy, to provide high quality affordable housing for those most in need.

Appendices



Appendix 1: Site Location Plan

BP
TWW



Key:

Site Boundary

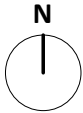
Notes:
Do not scale. All dimensions are in millimetres unless otherwise stated.
This drawing should be read in conjunction with all relevant project information and contract documentation. All dimensions to be checked prior to fabrication and or commencement of works. All works to comply with all relevant legal standards, building regulations and warranty provider requirements. Report any discrepancies, if in doubt ask.

Revisions:					
Rev	Status	Date	Description	Drn	Chkd
C01	A2	24.10.22	Planning Issue	ES	AA

Client Name:			Gravesham Borough Council		
Project Name:			St Columba's Close		
Drawing Name:			Site Location Plan		
Drawing Number:		Rev:	C01		Status:
SCC-BPTW-04-00-DR-A-0201					A2
Project No:	RIBA Stage:	Drawn By:	Scale:		
20-169	-	HLB	1:1250 @ A3		

PLANNING ISSUE

40 Norman Road,
Greenwich, London
SE10 9QX
t. 020 8293 5175
bptw.co.uk





London Studio

40 Norman Road
Greenwich
London SE10 9QX
t. 020 8293 5175

Midlands Studio

Alpha Works, Alpha Tower
Suffolk Street Queensway
Birmingham B1 1TT
t. 0121 667 6175

bptw.co.uk