

planning  
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## **Planning Statement**

**Former St Joseph's Preparatory School,  
Gravesend**

CLIENT: GHL (Gravesend) Ltd

January 2024

RT/MWB/30509

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# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of Galliard (Gravesend) Ltd in support of a full planning application at the former St Joseph's Preparatory School, Gravesend for:

*"Conversion of existing Victorian building, demolition of other existing buildings and development of the site to provide a mixed-use development comprising a new 3-storey GP surgery, 54no new residential dwellings with access, public open space and landscaping."*

- 1.1.2 This Planning Statement provides a detailed overview of the application site, its context, the relevant planning history and the development proposal. It identifies all applicable development plan policies as well as the NPPF and other relevant guidance. It sets out the planning considerations which are regarded as material to the determination of the application.
- 1.1.3 The report concludes that the proposal is appropriate in planning terms and accordingly requests that planning permission be granted.

## 1.2 DOCUMENTS

- 1.2.1 This document should be read in conjunction with suite of plans and documents submitted as part of the application. This includes the following:

### Documents:

| DOCUMENT                                    | AUTHOR                | VERSION/DATE  |
|---------------------------------------------|-----------------------|---------------|
| Completed Application Form                  | N/A                   | N/A           |
| Completed Notices                           | N/A                   | N/A           |
| Covering Letter                             | DHA                   | N/A           |
| Planning Statement                          | DHA                   | December 2023 |
| Design and Access Statement                 | Hollaway              | 22.112_REV01  |
| Landscape Statement                         | Exterior Architecture | December 2023 |
| Statement of Community Involvement          | DHA                   | December 2023 |
| Transport Assessment                        | Mode                  | November 2023 |
| Framework Travel Plan                       | Mode                  | November 2023 |
| Flood Risk Assessment and Drainage Strategy | DHA                   | December 2023 |
| Cultural Heritage Assessment                | RPS                   | November 2023 |
| Preliminary Ecological Appraisal            | Arbtech               | May 2023      |

|                                            |                   |               |
|--------------------------------------------|-------------------|---------------|
| Bat Survey                                 | Arbtech           | July 2023     |
| Noise Impact Assessment                    | Anderson Acoustic | December 2023 |
| Ground Investigation                       | Groundsure        | August 2022   |
| Playing Fields Review                      | Chilmark          | October 2023  |
| Arboricultural Survey                      | PJC               | July 2023     |
| Arboricultural Impact Assessment           | PJC               | December 2023 |
| Schedule of Accommodation<br>(Residential) | Hollway           | December 2023 |

## Plans

| DRAWING                              | DRAWING NUMBER            | REVISION |
|--------------------------------------|---------------------------|----------|
| Site Location Plan                   | 001                       | P1       |
| Site Plan                            | 2338-EXA-00-XX-DR-L-00100 | P03      |
| Illustrated Plan                     | 2338-EXA-00-XX-DR-L-00101 | P03      |
| General Arrangement Plan Sheet 01    | 2338-EXA-00-XX-DR-L-00111 | P03      |
| General Arrangement Plan Sheet 02    | 2338-EXA-00-XX-DR-L-00112 | P03      |
| General Arrangement Plan Sheet 03    | 2338-EXA-00-XX-DR-L-00113 | P03      |
| Existing Block Plan                  | 002                       | P0       |
| Demolition Drawing                   | 003                       | P0       |
| Existing Site Section AA             | 010                       | P0       |
| Existing Site Section BB             | 011                       | P0       |
| Existing Site Section CC             | 012                       | P0       |
| Existing Site Section DD             | 013                       | P0       |
| Existing & Proposed Street Elevation | 020                       | P1       |
| Existing Conversion Flats            | 030                       | P0       |
| Proposed Site Plan Ground Floor      | 040                       | P1       |
| Proposed Roof Plan                   | 041                       | P1       |
| Proposed Site Plan - Landscape       | 042                       | P1       |
| Proposed Site Plan - Density         | 043                       | P1       |
| Proposed Site Plan - Boundaries      | 44                        | P1       |
| Proposed Site Section AA             | 050                       | P1       |
| Proposed Site Section BB & CC        | 051                       | P1       |
| Proposed Site Section DD             | 052                       | P1       |
| Proposed Site Section EE             | 053                       | P1       |
| Proposed Site Section FF             | 054                       | P1       |
| Proposed Conversion Flats            | 070                       | P0       |

|                                  |     |    |
|----------------------------------|-----|----|
| Proposed New Build Flats         | 071 | P1 |
| House Type A - Level             | 080 | P0 |
| House Type A - Stepped           | 081 | P0 |
| House Type B & C                 | 082 | P0 |
| House Type D                     | 083 | P0 |
| House Type E                     | 084 | P2 |
| Pelham Medical Centre Plans      | 085 | P1 |
| Pelham Medical Centre Elevations | 086 | P1 |
| Refuse Storage                   | 090 | P0 |

## 2 SITE AND SURROUNDINGS

### 2.1 GENERAL LOCATION

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- 2.1.1 The site is situated within the built-up confines of Gravesend, located south of Old Road East. Surrounding the site is predominantly residential development, with some retail uses to the west of the site on Parrock Road.
- 2.1.2 The site does not fall within a conservation area. The nearest listed building is approximately 130m north of the site (at its nearest point), however it is intercepted by Old Road East, existing trees and a Church.
- 2.1.3 In terms of access, the site has an existing access point from Old Road East that serves vehicles and pedestrians. The nearest bus stop to the site is approximately 62m from the entrance of the site that provides the 736 services for Redwing Coaches to London. The second nearest bus stop is a 2-minute walk from the site, that provides Arriva services to Northfleet, Gravesend Centre, Ebbsfleet, Swanscombe and Bluewater.
- 2.1.4 Gravesend Train Station is a 19-minute walk from the site and provides links into central London, Luton, the Medway Towns and Ramsgate, as well as intervening stations. In terms of other amenities, there are takeaways, coffee shops and small convenience shops within walking distance of the site.

### 2.2 THE SITE

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- 2.2.1 The site itself comprises a former preparatory school, which closed in August 2021 and covers an area of approximately 1.6ha, including the existing school buildings, car parking area and existing playing field.
- 2.2.2 There are some existing trees situated at the centre of the site and along the southern boundary, none of which are protected by a Tree Preservation Order (TPO).



## 3 PLANNING HISTORY

### 3.1 PLANNING HISTORY

- 3.1.1 A desk-based planning history search on Gravesham Borough Council's online portal revealed several previous planning applications on the site, however there are no relevant applications since the year 2000.

### 3.2 PRE-APPLICATION ENGAGEMENT

- 3.2.1 Initial pre-application discussions with Gravesham Borough Council were held in 2021, when a draft sketch was presented for feedback. As the Council were supportive of the principle of the development, further meetings were held in July 2022 and August 2023. Subsequent written advice identified some key considerations and principles for the scheme, including confirmation of support for the principle of development on the site.
- 3.2.2 The key points from these discussions are outlined below and have been taken into account when finalising the proposed development.

#### JULY 2022 (REF. PRE20220155)

- 3.2.3 When the scheme was in its early stages, pre-application advice was sought for the redevelopment of land at buildings to provide a mixed-use development, consisting of a medical centre, open space and residential development, as shown on the indicative site layout below.



**Figure 2.1:** July 2022 Indicative Layout

3.2.4 A pre-application meeting was subsequently held with GBC Officers on 4th July 2022, and the written advice was received on 18th July 2022, under reference PRE20220155. The comments received as part of this pre-application submission are summarised below:

- (1) The principle of development was considered acceptable and in accordance with the objectives local and national planning policy.
- (2) Whilst the site is not listed within Playing Pitch Strategy list, the loss of playing pitches is a matter that would be contrary to national and local policy without suitable mitigation being provided.
- (3) Any future application would need to include sufficient justification demonstrating how the loss of the school and replacement with a medical centre, open space and residential development would comply with Policy CS10.
- (4) The retention of the Victorian 3 storey building is welcomed, and any redevelopment of the site should seek to respect the building line of Old Road and East take into account the land level differences throughout the site and surrounding build form.
- (5) Account should be taken of the land level differences throughout the site and how the conversion of the existing building into residential use would impact on the surrounding properties.
- (6) Any future application will need to demonstrate how the intensification of the access onto Old Road East would not have an adverse impact on the highway network and that acceptable visibility splays can be provided for the development.
- (7) The site is located within an area of archaeological potential, and this will need to be addressed in any future application. From the site visit and the existing built form on site it is unlikely that there would be any harm to archaeology.

3.2.5 To summarise, the advice received from GBC Officers confirmed that the principle of development in this location is acceptable, subject to addressing the loss of social infrastructure, engaging with Sports England and addressing any highways issues. The written advice is set out in full at Appendix 1 of the submitted Statement of Community Involvement.

#### **AUGUST 2023 (REF. PRE20230203)**

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3.2.6 A second pre-application advice request was submitted to GBC in June 2023, where a scheme was tabled for the development of 54no. residential units and a medical centre, including the conversion of the existing Victorian school building to 5no. flats alongside 5no. new build apartments and 44no. 2- and 3-bedroom houses.

3.2.7 The pre-application request was validated under reference PRE20230203 and benefitted from more developed design proposals, as shown below.



**Figure 2.2:** August 2023 Proposed Site Plan

3.2.8 A pre-application meeting was subsequently held with GBC Officers on 8<sup>th</sup> August 2023 and subsequently, informal advice was provided by email and a formal response was received in November 2023, which is provided at Appendix 2 of the submitted Statement of Community Involvement.

3.2.9 The comments received as part of this pre-application submission are summarised below:

- Issues with the south-west corner of the site and the relation of these dwellings to the existing ones on St Mary's Close.
- Tree removal is acceptable in principle.
- The 3-storey medical centre is large, justification for the 3 storeys is required.
- Welcome the retention of the wall at the front (demolition and reinstatement)
- Sport England will be consulted on during the application.

3.2.10 Full details on how the design comments have been responded to in the final proposed design are included within the accompanying Design and Access Statement.

### **GBC Leisure**

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- 3.2.11 The main overriding issue from a leisure perspective is that the development will take place on formal amenity playing field land, which is suggested to have been used for weekend community use by local football clubs, such as Gravesham Borough Youth FC. GBC Leisure have highlighted that there is an overall shortfall of pitches within the borough, especially junior pitches to satisfy current but also future demand.
- 3.2.12 To our knowledge, the site has never been used by other clubs and it does not feature in the Council's own evidence base as part of the playing pitch supply. In any event, the application site has not been used, or been capable of playing pitch use in recent years since the closure of the school. Additionally, the applicant has engaged with Sport England during the pre-application process, and the application is accompanied by a Playing Fields Review report prepared by Chilmark Consulting.

### **GBC Highways & Parking**

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- 3.2.13 In their pre-application response, the GBC Highways Officer commented that due to the number of dwellings, a secondary access would be required. In addition, it was noted that dwellings generally will have a single car parking space. As maximum vehicle parking standards are no longer considered to be applicable except in special circumstances, the applicant will need to justify the level of car parking provision.
- 3.2.14 Separately, a scoping note has been issued to KCC Highways, who have advised that they are happy with all elements subject to clarification on the parking. Access, widths, visibility and tracking were all agreeable – there is no need for an emergency access, and the proposals adhere to the design guide.

### **GBC Housing Strategy**

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- 3.2.15 The GBC Housing Officer has advised that the council will be seeking 16 homes of affordable home ownership. Of these, 11 should be for affordable or social rent and 5 for shared ownership. The affordable housing should be built to 'wheelchair accessible and adaptable' standards, Part M4(2) of the Building Regulations.
- 3.2.16 In addition, they acknowledge that the applicant may claim exemption from the full affordable housing requirement based on 'Vacant Building Credit.'

### **GBC Waste & Recycling**

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- 3.2.17 In summary, the design of the road layout does not allow for refuse vehicles to access the whole site and therefore further vehicle tracking is required to be undertaken. The waste and recycling manager has also commented that there is no detail on where the refuse and recycling bins will be stored.

### KCC Biodiversity

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- 3.2.18 The site has some connectivity and it is possible that if suitable features are present bats may roost within the buildings. In addition, if management has laxed since the school closed it is possible that some suitable habitat for protected species has established within the playing fields. Therefore, a preliminary ecological appraisal (PEA) and/or an Ecological Impact Assessment (EclA) report must be undertaken.
- 3.2.19 KCC Biodiversity also recommends that that due to the need for the application to contribute to the North Kent SAMMS there is a need for an appropriate assessment to be carried out as part of the application.

## 4 PROPOSED DEVELOPMENT

### 4.1 OVERVIEW

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- 4.1.1 Full planning permission is sought for the development of the site to provide a mixed-use development comprising a new 3-storey GP surgery, 54no new residential dwellings with public open space and landscaping.
- 4.1.2 The proposal includes an altered access from Old Road East, open space on the site and a new pedestrian access point from Coombe Road. The below site plan demonstrates the overall form of the development on the site.



### 4.2 LAYOUT AND DESIGN

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- 4.2.1 The scheme design proposed is described in full in the Design and Access Statement and the accompanying plans and drawing materials, which includes a detailed analysis of the site, its local context, the design evolution and the justification for the layout, form and external appearance.

#### Scale and Mix

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- 4.2.2 The existing Victorian building on the site will be converted into flats, alongside a new-build block of flats to the front of the site. 48 of the dwellings will be new-build houses. The mix of housing is detailed below:

| HOUSE TYPES                    | NO. OF UNITS |
|--------------------------------|--------------|
| Conversion flats - 1 bed units | 6            |
| New-Build flats – 1 bed units  | 6            |
| New-Build flats – 2 bed units  | 1            |
| 2 Bed House                    | 36           |
| 3 Bed House                    | 5            |
| <b>Total Units</b>             | <b>54</b>    |

4.2.3 The provided dwellings have been planned in accordance with the Nationally Described Space Standards.

4.2.4 The GP surgery will provide 14 consulting rooms and 6 treatment rooms across a three-storey building, alongside 40 parking spaces (4 of which are accessible spaces). The mix of room types is outlined below:

| ROOM TYPES            | NO. OF UNITS |
|-----------------------|--------------|
| Waiting Areas         | 2            |
| Interview Room        | 1            |
| Consulting/Exam Rooms | 14           |
| Treatment Rooms       | 6            |

## Design

4.2.5 A contextual analysis has been undertaken by the appointed architects which has informed the overall design of the scheme.

4.2.6 London stock brick is used at the entrance of the site to reflect the architectural characteristics of the surrounding locality. This gently transitions into light grey brick, with selected dark brick dwellings to enhance the materiality of the site.

4.2.7 The layout has been designed to minimise front to-front relationships and to orientate views on to the open space. This enhanced view of the site also creates security through natural surveillance.

## Access and parking

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- 4.2.8 It is proposed that vehicular access to the site will be provided through the construction of a new bell mouth access taken from Old Road East that will replace the current drop kerb vehicle cross over to the school site. The proposed access has been designed in accordance with guidelines detailed within the KCC Kent Design Guide and has been agreed by KCC during pre-application discussions.
- 4.2.9 A through route connecting with Coombe Road will also be created for pedestrians and cyclists only at the southern corner of the site.
- 4.2.10 Parking is provided in accordance with the relevant parking standards used by GBC, KCC's Supplementary Planning Guidance 4 Vehicle Parking Standards July 2006. Based on the proposed quantum of development and number of bedrooms, parking spaces have been provided based on the following provision:
- 1 bedroom (12no. units)– 1 space
  - 2 bedrooms (37no. units) – 1 space
  - 3 bedrooms (5no. units) – 2 spaces
- 4.2.11 Secure and safe cycle parking will be provided thorough the scheme within the curtilage of each dwelling (shed/garage etc.) or through communal cycle stores.
- 4.2.12 In addition, a total of 40 car parking spaces are provided for the GP surgery, 4 of which will be accessible spaces. 11 cycle parking spaces will be provided, in line with minimum standards, based on 22 consulting / treatment rooms.

## Landscaping

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- 4.2.13 The landscape design proposal seeks to define the character and appearance of the outdoor spaces through the integration of landscape character areas.
- 4.2.14 Three character areas are proposed within the scheme as a mechanism to define spatial boundaries and variation in landscape treatment:
- Green Streets - A network of well-vegetated streets which create connections to existing green infrastructure and provide for pedestrian and vehicular connections across the scheme.
  - Community Green - A large green open space and play area which provides connections to existing streets and opportunities for play, leisure, events and recreation.
  - Car Park - A large area of car parking which utilises permeable surfacing and soft landscape to provide screening and introduce greening where appropriate.

- 4.2.15 The proposed planting strategy includes native hedge and tree planting, while a palette of amenity and SUDS planting makes up the majority of the road and parkside spaces.

## 5 PLANNING POLICY CONTEXT

### 5.1 INTRODUCTION

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 5.1.2 For the purposes of this application, the Development Plan for Gravesham Borough is the Gravesham Local Plan Core Strategy (2014) and the Gravesham Local Plan First Review – Saved Policies (1994)

### 5.2 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 5.2.1 The Gravesham Core Strategy was adopted by the Borough in 2014 and sets out the vision for the borough.
- 5.2.2 The following policies are considered relevant to this planning application:

| POLICY                                      | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CS01: Sustainable Development               | Planning applications that accord with policies in Gravesham's development plan will be approved without delay unless material considerations indicate otherwise; The Council will take a positive approach to sustainable development as listed in NPPF and this Core Strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| CS02: Scale and distribution of development | The Development strategy for the Borough is to retain and improve the existing housing stock/employment land and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| CS10: Physical and Social Infrastructure    | Support will be given to proposals and activities that protect, retain or enhance existing social and physical infrastructure or lead to provision of additional infrastructure to improve community wellbeing. Where there is the threat of loss of existing infrastructure, special consideration will be given to viability and if sufficient alternative provision is available.<br>If development leads to the need for new/improved social or physical infrastructure, developers will be required to 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. |
| CS11: Transport                             | New developments should mitigate their impact on transport networks/highways. As appropriate transport assessments and travel plans should be provided and implemented to ensure travel choice and sustainable opportunities. Transport assessment work should be undertaken in accordance with national and local policy guidance and to identify detailed transport network/highway requirements.<br>Sufficient parking must be provided in developments in accordance with adopted parking standards to reflect availability of alternative means of transport and accessibility to services/facilities.                                                                                                                                                 |
| CS12: Green Infrastructure                  | There will be no net loss of biodiversity within the Borough and opportunities to enhance, restore, re-create and maintain habitats will be sought;<br>Where a negative impact on a protected or priority habitat/species cannot be avoided on development sites and where the importance of the development outweighs the biodiversity impacts, compensatory provision is required either elsewhere on the site or off-site;<br>The overall landscape character will be conserved, restored and enhanced.                                                                                                                                                                                                                                                  |

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|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CS13: Green Space, Sport and Recreation | The Council aims to make adequate provision for and to protect and enhance the quality, quantity, and accessibility of green space, playing pitches and other sports facilities; A set of consistent green space, playing pitch and sports provision standards will be established and applies to all new development, while provision should be made on site, where this is not possible, (due to size, location or specified circumstances) alternative provision or enhancement of existing facilities will be required off-site                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| CS14: Housing Type and Size             | The Council will protect the mix of housing in existing housing stock and will resist converting family-sized residential units into smaller properties;<br>The Council will expect new housing development to provide a range of dwelling types and sizes that consider existing character of area and evidence of local need to create sustainable and balanced communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| CS15: Housing Density                   | Sites will be developed with a variety of densities, depending on location and public transport accessibility. Housing form and density will vary across larger sites in response to accessibility and other site characteristics. Varying density should be used to develop different character areas;<br>All new housing will be developed at a density that is consistent with achieving good design standards and does not compromise existing site character. Subject to this overriding consideration: <ul style="list-style-type: none"> <li>• Within urban areas, new residential development will be expected to achieve a minimum density of 40 dwellings per ha,</li> <li>• (ii) in rural areas, residential development will be expected to achieve a minimum density of 30 dwellings per ha;</li> </ul> Proposals that fail to make efficient use of space regarding character and location of the area may be refused planning permission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| CS16: Affordable Housing                | The provision of affordable housing will be required on all new housing developments of 15 dwellings or more on sites over 0.5 ha or more in urban area; The amount of affordable housing to be provided by private housing development sites above the threshold will be 30% in urban areas; The Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing; Development is subject to viability and a tenure mix necessary to meet local needs and achieve a sustainable and socially inclusive development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| CS18: Climate Change                    | Development will need to be directed to areas with least flood risk.<br>Proposals in areas with high flood risk must be accompanied by a Flood Risk Assessment and a Flood Risk Management Plan to demonstrate adequate flood defences have been installed and permission may be refused if proposals fail said plans.<br>The Council will expect new development to take advantage of opportunities to reduce causes and impacts of flooding.<br>The Council will seek to minimise the impact of drainage on waste water systems from new developments, in particular, the Council will <ul style="list-style-type: none"> <li>• Require surface water run-off to have no greater adverse impact than existing use and</li> <li>• Require the use of SuDS on all developments where technically and financially feasible; (6)</li> </ul> The Council aims to manage water supply for Borough and reduce impacts from developments on potable water, in particular, the Council will <ul style="list-style-type: none"> <li>• Require all new homes to be built at least level 3/4 of the Code for Sustainable Homes in terms of water use and Where</li> <li>• it can be demonstrated that a development is unable to meet these standards, or the additional standards set out below, permission will only be granted should compensatory provision be made available.</li> <li>• Seek 5% of homes on Key Sites to act as exemplars by meeting level 5/6 of the Code for Sustainable Homes in water use.</li> </ul> |
| CS19: Development and Design Principles | New development will be visually attractive, enhance local, historical and environmental character, meet anti-crime standards and be resilient to climate change, this will be done through: <ul style="list-style-type: none"> <li>• Using the collaborative approach advocated in Building for Life 12 and within guidance set out by Kent Design, taking into consideration scale, height, building lines, layout, materials and other architectural details of adjoining buildings and account will be taken of wider site context, including strategic views, site topography, significance of heritage assets and features of townscape/landscape value that contributes to character;</li> <li>• Encouraging sustainable living and choice through connectivity via public transport, local services and community, sustainable travel, enhance Green Grid and encourage healthier lifestyles;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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|                                            | <ul style="list-style-type: none"> <li>• New development will be located, designed and constructed to:               <ul style="list-style-type: none"> <li>(i) safeguard amenity (including privacy, daylight and sunlight) of occupants and neighbouring properties/land,</li> <li>(ii) avoid adverse environmental impacts from pollution (including noise, air, odour, light) and land contamination,</li> <li>(iii) not pose unacceptable risk/harm to water environment (including quality and/or quantity of ground waters, surface waters, wetlands and coastal systems);</li> </ul> </li> <li>• Design and layout of new residential development (including conversions) must accord with adopted Residential Layout Guidelines;</li> <li>• New development will be designed for inclusivity of all community members;</li> <li>• Must provide appropriate levels of public and private amenity space;</li> <li>• Must include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage, and will ensure public realm/open spaces are well planned, appropriately detailed and maintained;</li> <li>• Car parking will be relevant to the development it serves;</li> <li>• New development must protect and, when appropriate, enhance biodiversity and the Borough's Green Infrastructure network and support will be given to environmental enhancements;</li> <li>• New development must be fit for purpose and adaptable to allow changes to be made to help user's needs;</li> <li>• Design and layout will take advantage of opportunities to increase resilience to climate change's effects (including protection against flood risk, deliver carbon reduction (where necessary), provision for low carbon and renewable energy and minimise energy and water consumption);</li> <li>• Must incorporate appropriate facilities for recycling and waste;</li> <li>• Must create a safe environment and provide surveillance to minimise crime and vandalism</li> </ul> |
| CS20 Heritage and the Historic Environment | <p>Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough.</p> <p>These include:</p> <ul style="list-style-type: none"> <li>• Gravesend Town Centre, its development as a heritage riverside town, and its setting;</li> <li>• The Borough's urban and rural conservation areas; and Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.</li> </ul> <p>When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

## 5.3 GRAVESHAM LOCAL PLAN FIRST REVIEW (1994) SAVED POLICIES (2014)

5.3.1 The Gravesham Local Plan First Review was replaced by the Core Strategy in 2014. The saved policies relevant to this proposal from the Local Plan are detailed below.

| POLICY | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| H5     | <p>In considering proposals for the conversion of existing properties to provide flats, maisonettes, bedsitters, hostels, homes and other forms of multiple occupancy, the Borough Council will have regard to the following criteria:-</p> <p>(i) The building shall be in an appropriate area for conversion to flats, maisonettes, bedsitters and multiple occupancy. Unless there are special or overriding circumstances, conversions will not normally be permitted in an area comprised for the most part of single family dwellings. Conversely, conversions will not normally be permitted in areas which are environmentally unsuitable for young families and which already demonstrate a predominance of multiple occupation.</p> |

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|     |                                                                                                                                                                                                                                                                           |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | (ii) The building shall be of such a size and arrangement as to be generally unsuitable for single family occupation.                                                                                                                                                     |
|     | (iii) The proposal shall have regard to the Borough Council's Residential Layout Guidelines, as set out in supplementary planning guidance.                                                                                                                               |
|     | (iv) The adopted Vehicle Parking Standards must be achieved wherever feasible.                                                                                                                                                                                            |
| LT6 | Proposals for new housing development will be expected to make provision for open space and play space where appropriate to the scale of development and type of housing proposed, having regard to the provision of and proximity to existing open space in the locality |

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## 5.4 MATERIAL CONSIDERATIONS

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### NATIONAL PLANNING POLICY FRAMEWORK

5.4.1 The NPPF was adopted by the Government in 2012 and sets out the Government's planning policies for England and how these should be applied. The NPPF was updated in February 2019, July 2021, September 2023 and again in December 2023.

5.4.2 The following paragraphs within the National Planning Policy Framework are considered relevant to the proposal:

#### ***Section 2: Achieving Sustainable Development***

5.4.3 **Paragraph 7** states that:

*'The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs<sup>4</sup>. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection'*

5.4.4 **Paragraph 8** states that achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*

- b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

5.4.5 **Paragraph 10** states that:

*'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development'*

5.4.6 **Paragraph 11** states that:

*'Plans and decisions should apply a presumption in favour of sustainable development.*

*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<sup>8</sup>, granting permission unless:*

*(i) 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.'*

#### **Section 4 – Decision-making**

5.4.7 **Paragraph 38** states that:

*'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at*

<sup>8</sup> this includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply of housing (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the housing delivery test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years)

*every level should seek to approve applications for sustainable development where possible.'*

5.4.8 **Paragraph 47** states 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.'*

5.4.9 **Paragraph 55 and 56** outlines that Local Planning Authorities should consider:

*'Whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition'*

*'Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects'*

**Section 5 – Delivering a sufficient supply of homes**

5.4.10 **Paragraph 60** 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 are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much as an area's identified housing need as possible, including with an appropriate mix of housing types for the local community'*

5.4.11 **Paragraph 70** states:

*'Small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly. (d) should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes'.*

5.4.12 **Paragraph 96** states that:

*'Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:*

*(a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong*

*neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

*(b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and*

*(c) enable and support healthy lifestyles, especially where this would address identified local health and well-being 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.'*

**5.4.13 Paragraph 97** states that:

*'To provide the social, recreational, and cultural facilities and services the community needs, planning policies and decisions should:*

*(a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

*(b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*

*(c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*

*(d) ensure that established shops, facilities, and services are able to develop and modernise, and are retained for the benefit of the community; and*

*(e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.'*

**5.4.14 Paragraph 102** states that:

*'Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate*

*change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport, and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'*

5.4.15 **Paragraph 103** states that:

*'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use*

**Section 9 – Promoting sustainable transport**

5.4.16 **Paragraph 108** states that:

*'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- (a) the potential impacts of development on transport networks can be addressed;*
- (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- (c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.'*

5.4.17 **Paragraph 115** states that:

*'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

**Section 11 – Making effective use of land**

5.4.18 **Paragraph 123** states:

*'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'*

5.4.19 **Paragraph 124** states:

*'planning policies and decisions should:*

- a) Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
- b) Recognise that some undeveloped land can perform many functions, such as wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*
- c) Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- d) Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used for effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure) and'.*

5.4.20 **Paragraph 128** states:

*'Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*

- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed and beautiful, attractive and healthy places.*

## **Section 12 – Achieving well-designed and beautiful places**

5.4.21 **Paragraph 131** states that:

*'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'*

5.4.22 **Paragraph 135** states that:

*'Planning policies and decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

5.4.23 **Paragraph 136** states that:

*'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'*

5.4.24 **Paragraph 139** states that:

*'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes. Conversely, significant weight should be given to:*

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or*
- b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

5.4.25 **Paragraph 140** states that:

*'Local planning authorities should ensure that relevant planning conditions refer clear and accurate plans and drawings which provide visual clarity about the design of development, and are clear about the approved use of materials where appropriate... Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme'*

**Section 14 – Meeting the challenge of climate change, flooding and coastal change**

5.4.26 **Paragraph 157** states that:

*'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*

## **Section 15 – Conserving and enhancing the natural environment**

5.4.27 **Paragraph 180** states that:

*'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

## **5.5 SUPPLEMENTARY PLANNING DOCUMENTS**

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### **Residential Layout Guidelines SPG (2020)**

- 5.5.1 The adopted Residential Layout Guidelines SPG sets out the standards that all new residential development should comply with in the Borough.

### **Kent Vehicle Parking Standards SPG 4 (2006)**

- 5.5.2 The KCC vehicle parking standards sets out the standards for parking associated with developments.

## **5.6 FIVE YEAR HOUSING LAND SUPPLY**

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- 5.6.1 The provision of housing is a key Government objective as set out in paragraph 60 of the NPPF with a need to significantly boost the supply of housing. Policy CS02 identifies a need to deliver at least 6,170 new dwellings in the Borough for

the plan period. Gravesham cannot currently demonstrate a five-year supply of housing land. A 2.90 year supply is claimed in the most recent Five Year Housing Land Supply Statement, published in March 2023. This demonstrates a significant shortfall.

- 5.6.2 The lack of housing supply and delivery in Gravesham demonstrates an unequivocal need for a more permissive stance to the delivery of housing through allowing developments such as this which deliver much needed housing in the Borough.
- 5.6.3 The presumption in favour of sustainable development set out within the NPPF does therefore apply, with planning permission to be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, and unless the application of particular policies within the Framework which protect areas of assets of particular importance provides a clear reason for refusing the development proposed.

## 6 PLANNING CONSIDERATIONS

### 6.1 INTRODUCTION

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- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permissions to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.2 It is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 6.1.3 The following planning policy considerations are assessed in this section in relation to the proposal:
- (1) Principle of Development
    - (a) Conversion of Existing Building
    - (b) Development on Playing Field
    - (c) Housing Supply and Delivery
  - (2) Design and Layout
    - (a) Design
    - (b) Layout and Landscaping
    - (c) GP Surgery
    - (d) Housing Mix
  - (3) Affordable Housing and Vacant Building Credit
  - (4) Residential Amenity
  - (5) Highways, Access and Parking
  - (6) Trees and Ecology
  - (7) Flood Risk and Drainage
  - (8) Heritage
  - (9) Noise

## 6.2 PRINCIPLE OF DEVELOPMENT

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- 6.2.1 The starting point for considering the proposal is the adopted Local Plan. The proposal seeks permission for the demolition of existing buildings and the development of a new GP surgery and 54 new residential dwellings at the former St Joseph's Convent Preparatory School, Gravesend.
- 6.2.2 The site falls within the built-up confines of Gravesend on a previously developed brownfield site, however the previous use of the site was for education, whereby Policy CS10 of Local Plan states that where there is the threat of loss of existing social infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.
- 6.2.3 The former preparatory school has been vacant since 2021, therefore as the educational use has ceased and remains vacant, it cannot be considered a loss of existing infrastructure. Despite the site being marketed, no further education use has come forward on the site, indicating that there is sufficient alternative provision available in the Borough. There are two existing independent schools within the Borough, the Bronte School and Cobham Hall.
- 6.2.4 Nevertheless, the proposed development seeks to provide social infrastructure in the form of a GP surgery, to serve the wider community of Gravesend and to enhance the existing medical infrastructure in the Borough that has been identified as insufficient.
- 6.2.5 A significant need has been identified in the Borough for the GP surgery, therefore the proposed development represents a solution to provide such need.

### Conversion of Existing Building

- 6.2.6 Furthermore, it is proposed to retain the existing Victorian Building on the site and convert the building to residential flats. The former use of the site is understood to be once residential, however the last use of the building was for educational purposes.
- 6.2.7 Policy H5 of the saved Local Plan relates specifically to the conversion of existing properties to provide flats. The conversion of existing buildings will be supported provided that they are in a suitable location for such conversion, that the building is unsuitable for single family accommodation and that the proposals meeting adopted residential guidelines and parking standards.
- 6.2.8 The site is surrounded by residential dwellings on Old Road East on all boundaries, and the surrounding area is therefore predominantly residential. The proposal in its entirety, including the conversion of building, would provide a worthwhile contribution to meeting local housing needs, which weighs in favour of the application and therefore represents an appropriate use of the building consistent with its sustainable location. Housing need is dealt with later in this section.

### Development on Playing Field

- 6.2.9 As the site is a former school site, a significant part of the site forms the school's previous playing field.
- 6.2.10 Policy CS13 of the Core Strategy states that the Council will protect existing playing pitches. This is further supported by Sport England's Playing Fields Policy and Guidance document that states that Sport England must be consulted when development affects playing fields. Sport England will oppose to the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:
- All or part of a playing field; or
  - Land which has been used as a playing field and remains undeveloped; or
  - Land allocated for use as a playing field.
- 6.2.11 Unless the development as a whole meets one or more of the five specific exceptions. Exception 1 states:
- 'A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport'.*
- 6.2.12 This is supported by Paragraph 103 of the NPPF states that existing open space, sports and recreational and including playing fields should not be built on unless:
- (a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - (b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - (c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 6.2.13 In order to assess the proposed development's impact on playing fields, a Playing Pitch Strategy has been commissioned and it submitted alongside this application that concludes the proposed development, while resulting in change from of a non-operational former external playing field area solely used by St Joseph's Convent Preparatory School, would not result in a lack of sufficient supply in the catchment.
- 6.2.14 The proposed scheme would replace much of the playing pitch space with residential and health care facilities together with associated infrastructure and playing space. In pre-application comments, GBC Leisure has indicated that a financial contribution in lieu of the loss of playing pitch space would be acceptable to recognise the purported loss that the development would lead to.

### Housing Supply and Delivery

- 6.2.15 Paragraph 77 of the NPPF states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.
- 6.2.16 Gravesham Borough Council are unable to demonstrate a five-year housing land supply as required by the NPPF. The Council's most recent monitoring report on their five-year supply as of March 2023 confirms that the Council can only demonstrate a 2.90 year supply when applying the 20% buffer. In total, the 2.90 position equates to a deficit of 1,785 dwellings against the required need of dwellings to achieve 5.0 years over the next five-year period.
- 6.2.17 The position remains that the scheme fully accords with the development plan and therefore in line with Paragraph 11 of the NPPF, the development should be approved without delay, however based on the lack of five-year housing land supply, the NPPF at paragraph 11(d) requires the titled balance to be applied. Paragraph 11(d) states that a presumption in favour of sustainable development should take precedence.
- 6.2.18 It is clear that there is a housing need in Gravesham, and housing need is **highly material** and carries **significant weight** in the planning balance judgement to be made on this application. In such circumstances the NPPF is clear, that planning applications for housing development, should be considered in the context of the presumption in favour of sustainable development and planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when considered against the policies in the NPPF when taken as a whole.
- 6.2.19 Paragraph 70 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. It also states that the development of windfall sites within existing settlements should also be supported. Therefore, as the site is for 54 dwellings within a sustainable location within the built up confines of Gravesend, it therefore complies with the NPPF and will make an important contribution to Gravesham's housing supply, which as per the NPPF should be given weight.

## **6.3 DESIGN AND LAYOUT**

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- 6.3.1 It is noted that Policy CS19 of the Core Strategy relates to design and layout principles for new development, requiring new development to be visually attractive, fit for purpose and locally distinctive, conserving and enhancing the local character, whilst integrating well with its surroundings. It also requires developments to provide appropriate levels of private and public amenity space and hard and soft landscaping.
- 6.3.2 Paragraph 135 of the NPPF is clear that developments should function well, add to the overall character of the area and be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

### Design

- 6.3.3 The proposed new-build residential dwellings have been designed in the context of the local surrounding area. Whilst there is a general mix of design and lack of conformity within the immediate vicinity, high quality materials are reflective of a modern, yet traditional design to respond to the Victorian character seen on the existing building on the site.
- 6.3.4 The new-build houses will be 2-storeys in height which is characteristic of the surrounding area, although there are some single-storey dwellings adjoining the western boundary of the site, many of which feature roof dormers.
- 6.3.5 The proposed GP surgery will be 3-storeys in height, alongside the existing Victorian building which is also 3-storeys. It is acknowledged that the proposed GP building would increase the scale of development on site, therefore care has been taken to ensure that the building is not visually one large bulk, for example through the use of a flat roof to reduce the visual prominence of the building.
- 6.3.6 The design of the GP surgery creates an identity for the building that is reflective of its community use, but will sit sensibly within the wider side and the surrounding area as set out on the proposed CGI below.



FIGURE 6.1: PROPOSED CGI LOOKING NORTH EAST (HOLLWAY ARCHITECTS)

- 6.3.7 The full detail of the design is set out within the submitted Design and Access Statement.

Layout and Landscaping

- 6.3.8 The key design principles of the site layout have been created to create an attractive and legible site set with a strong landscape framework, making use of the existing landscaping on the site with additional landscaping proposed.
- 6.3.9 The main road through the site provides a central access directly to all dwellings and secondary roads and the GP surgery and provides a secondary pedestrian access to and from the south of the site.
- 6.3.10 Overall, the layout of the development is considered to create a high quality, efficient and well-designed scheme, that responds to the site's opportunities and constraints and allows for sufficient public open space and landscaping opportunities.
- 6.3.11 The site can accommodate a sufficient amount of green and open space on the site, therefore complying with Policy CS13 of the Core Strategy.

Housing Mix

- 6.3.12 Policy CS14 of the Core Strategy states that the Council will expect new housing development to provide a range of dwelling types and sizes.
- 6.3.13 The proposed development will provide a mix of 1, 2 and 3 bedroom dwellings in the form of houses and flats that fully accord with the adopted Residential Layout Guidelines (SPG2) and the Nationally Described Space Standards.

## **6.4 AFFORDABLE HOUSING / VACANT BUILDING CREDIT**

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- 6.4.1 Policy H14 of the Local Plan requires sites delivering 15 or more dwellings to provide an element of affordable housing.
- 6.4.2 It is acknowledged that the Council's starting point on affordable housing provision is 30% provision on developments within the urban area.
- 6.4.3 A Financial Viability Assessment has been undertaken that concludes that affordable housing cannot be delivered.
- 6.4.4 However, there are several vacant buildings on the site, whereby Paragraph 65 of the NPPF states that support the re-use of brownfield sites, where vacant buildings are being re-used or redeveloped, any affordable housing contribution should be equivalent to the existing gross floorspace of the existing buildings.
- 6.4.5 The Planning Policy Guidance (PPG) states that national policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit

equivalent to the existing gross floorspace of relevant vacant buildings when the Local Planning Authority calculates any affordable contribution which will be sought (Paragraph 026 Reference ID: 23b-026-20190315).

6.4.6 VBC applies where the building has not been abandoned. The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- The condition of the property
- The period of non-use
- Whether there is an intervening use; and
- Any evidence regarding the owners intention

6.4.7 Each case is a matter for the collecting authority to judge.

6.4.8 On the basis of the above, it is proposed to demolish 1,989 sqm and it is proposed to deliver 5,054 sqm of residential floorspace.

6.4.9 The policy requirement (30% of 54) equates to 16.6 dwellings which has been rounded to 17.

#### **Vacant Building Credit calculation**

$$RAH = AH - ((AH \times EFS) / PFS)$$

**Where:**

**RAH** = Revised number of affordable housing units to be provided

**AH** = Expected number of affordable housing units to be provided prior to application of vacant building credit (i.e. 30% of total number of dwellings proposed)

**EFS** = Existing floorspace to be demolished

**PFS** = Proposed floorspace to be created

6.4.10 Based on the above calculation methodology, it is considered that the VBC equates to a policy requirement affordable housing contribution of 10 dwellings.

6.4.11 The applicant is engaging in discussions with the Council relating to financial viability.

## **6.5 RESIDENTIAL AMENITY**

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6.5.1 Policy CS19 requires new development to be designed and constructed to safeguard amenity, including privacy, daylight and sunlight of occupants and neighbouring properties.

6.5.2 The proposed development has been designed to achieve appropriate window to window distances in accordance with the adopted Gravesham Residential Layout guidelines and in close consultation with Gravesham Borough Council.

- 6.5.3 During the design development, as set out within the submitted Design and Access Statement, the scheme has evolved to mitigate any potential overlooking and privacy issues, particularly with the dwellings adjoining the site on the western boundary.
- 6.5.4 The proposal has also been designed to eliminate any overlooking/privacy issues within the site and between existing and proposed dwellings.
- 6.5.5 Furthermore, policy CS19 requires new development to provide appropriate levels of public and private amenity space.
- 6.5.6 In terms of public amenity space, the proposed development provides a substantial area of open space on the site that will be accessible to the wider public and proposed residents, including those in the flats that has been designed in accordance with Gravesham's adopted Open Space standards.
- 6.5.7 Furthermore, each house has been provided with private gardens, in accordance with Gravesham's Residential Layout Guidelines.

## **6.6 HIGHWAYS ACCESS AND PARKING**

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- 6.6.1 The site is accessed from Old Road East that adjoins the northern boundary of the site.
- 6.6.2 It is proposed to alter the existing access point to the site to achieve the appropriate visibility splays, details of this are set out within the submitted Transport Assessment.
- 6.6.3 Old Road East has a footway on either side of road allowing for direct pedestrian access to the site, however an additional pedestrian route to the site is proposed from Coombe Road to increase pedestrian connectivity and allow access to the open space on the site to wider public.
- 6.6.4 The nearest train station to the site is Gravesend Train Station that can be reached on foot in 19-minutes, or via bus. The nearest bust stop to the site is approximately 62m from the site entrance that provides coach services to London or there is a further bus stop a 2-minute walk from the site that provides services to Gravesend Town Centre where the train station is accessible and Northfleet, Ebbsfleet, Swanscombe and Bluewater.
- 6.6.5 Policy CS11 requires new developments to mitigate their impact on transport networks/highways. The submitted Transport Assessment assesses the sites potential impact on the local highway network and concludes that the proposed development will not have a significant adverse or severe impact on the operation or safety of the surrounding highway network and therefore in accordance with the NPPF, the proposal should be considered acceptable in transport terms.
- 6.6.6 The proposed development relates to both residential and a GP surgery. In terms of the residential element a total of 60 spaces are provided (inclusive of 4 garages

and 2 visitor spaces) which is considered suitable based on the site accessibility and the reduction allowance detailed within the local policy.

- 6.6.7 A total of 40 car parking spaces will be provided for the GP surgery, 4 of which will be accessible spaces. 11 cycle parking will be provided in line with minimum standards. This level of parking will be justified through an accumulation assessment to demonstrate that it can serve the expected demand.

## 6.7 TREES AND ECOLOGY

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### Trees

- 6.7.1 There are a number of existing trees on the site. The trees have been surveyed and an Arboricultural Survey is submitted alongside this planning application.
- 6.7.2 In summary, a total of 24 individual trees and four tree groups were surveyed including one category A tree. No TPO's were reported within or adjacent to the site and it is not within a conservation area.
- 6.7.3 It is proposed to lose 15 individual trees and 4 groups of trees. 150 new trees are proposed to be planted on site to mitigate this loss. The full details are assessed within the submitted Arboricultural Impact Assessment.

### Ecology

- 6.7.4 Policy CS12 states that there will be no net loss of biodiversity within the Borough and opportunities to enhance, restore, re-create and maintain habitats will be sought.
- 6.7.5 A Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PRA) has been undertaken and is submitted with this application. The PEA/PRA assessed the potential habitats/species on the site and is summarised below.

### Designated Sites

- 6.7.6 There is a SSSI within 2km of the site however no impacts to the SSSI are anticipated due to the distance of the proposed development.

### Habitats and Flora

- 6.7.7 There are no notable habitats on the site or within the immediate vicinity. The site contains neutral grassland, scattered trees and dense scrub which has low ecological value for wildlife.
- 6.7.8 One invasive species was identified on the time which will be removed prior to construction.

### Amphibians

- 6.7.9 Amphibians are unlikely to be present on site as the site is disconnected to any ponds within the wider area. No impacts are anticipated on Great Crested Newts as they are absent from the site.

#### Reptiles

- 6.7.10 Based on the findings of the PEA, the presence of reptiles cannot be discounted from the site however owing to the nature of the proposed development and the low potential for impacts to reptiles, further surveys are not considered proportionate to the application, however a precautionary working method will be implemented during construction, to include the following measures:

- Site clearance will be undertaken outside of the reptile hibernation season (November to February) as far as possible.
- A staged approach will be adopted for vegetation clearance, whereby the vegetation will be strimmer to 15cm and left overnight to allow any reptiles to disperse. The vegetation can then be cleared to ground level and must be maintained at this level for the duration of construction to deter reptiles from the working area.
- Any log piles will be dismantled by hand and debris and brash will be stored on pallets or removed from the site to prevent reptiles from utilising these areas.
- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations.
- In the unlikely event that a reptile is identified, works must cease and advice must be sought from a suitably qualified ecologist.

#### Roosting Bats

- 6.7.11 Each existing building on the site has been assessed for their potential to support roosting bats, the findings are set out below:

**Building 1:** Low potential for roosting bats

**Building 2:** Low value for roosting bats

**Building 3:** Negligible value for roosting bats

**Building 4:** Negligible value for roosting bats

**Building 5:** Negligible value for roosting bats

**Building 6:** Low value for roosting bats

**Building 7:** Negligible value for roosting bats

**Building 8:** Negligible value for roosting bats

**Building 9:** Negligible value for roosting bats

**Building 10:** Negligible value for roosting bats

- 6.7.12 Bats are very unlikely to be roosting within buildings 3-10 however for buildings 1, 2 and 6, which have low potential for roosting bats a bat emergence and re-entry was recommended. The survey has been undertaken and is submitted alongside this application and concludes that bats are very unlikely to be roosting on site and as such there are no anticipated impacts for bats as part of the development.
- 6.7.13 In the unlikely event that bats are unexpectedly found during any stage of the development, work should stop immediately and advice from a suitably qualified ecologist should be sought.

Foraging and Commuting Bats

- 6.7.14 The proposed development will result in the loss of scrub and trees which could reduce the availability of foraging or commuting resources in the local area. However further bat surveys have not been deemed necessary due to the urban location of the site. If external lighting is proposed, a sensitive lighting strategy should be prepared.

Badger

- 6.7.15 Badgers are unlikely to be present on the site.

Hazel Dormouse

- 6.7.16 Dormice are unlikely to be present on the site.

Hedgehog

- 6.7.17 The site provides suitable habitat for hedgehogs and therefore a precautionary working method will be implemented during construction including the following measures:
- Site clearance will be undertaken outside of the hedgehog hibernation seasons (November to March) insofar as possible.
  - A staged approach will be adopted for vegetation clearance, whereby the vegetation will be strimmed to 30m and left overnight to allow any hedgehogs to disperse. The vegetation can then be cleared to ground level for the duration of construction to deter hedgehogs from the working area.
  - Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape.
  - The use of night-time lighting will be avoided or a sensitive lighting design will be implemented to avoid light spill on to retained habitats which hedgehogs could use.

- Any chemical or pollutants use or created by the development should be stored and disposed of correctly according to COSHH regulations.
- If any hedgehogs are found in the working area these should be allowed to disperse of their own accord or, if at immediate risk, should be moved by hand to sheltered, vegetated area away from disturbance.

#### Otter and Water Vole

- 6.7.18 Both species are unlikely to be present on the site.

#### Birds

- 6.7.19 There is a confirmed presence of breeding and nesting birds on site therefore works should be undertaken outside of the period 1<sup>st</sup> March to 31<sup>st</sup> August.

#### Invertebrates

- 6.7.20 Species are unlikely to be present on the site.
- 6.7.21 Based on the above and suggested mitigation measures, there will be no harm to species on the site as a result of development.

## **6.8 FLOOD RISK AND DRAINAGE**

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#### Flood Risk

- 6.8.1 The National Planning Practice Guidance requires all planning applications on sites over 1ha to be accompanied by a Flood Risk Assessment.
- 6.8.2 According to the Environment Agency Flood Map for Planning, the proposed development falls within Flood Zone 1, which has the lowest risk of flooding.
- 6.8.3 A Flood Risk Assessment and Drainage Strategy is submitted alongside this planning application. The Flood Risk Assessment assesses all potential sources of flooding on the site and concludes that there will be low risk of flooding from fluvial, sewer, groundwater, reservoirs, and overland flow sources as a result of the development.
- 6.8.4 The submitted Flood Risk Assessment concludes that the site it not at risk of flooding from any sources.

#### Drainage

- 6.8.5 Sustainable Urban Drainage (SuDS) techniques will be used to deal with the surface water as a result of the development, which will replicate the existing drainage regime by dealing with surface water at the source, to prevent increasing the risk of downstream flooding.

- 6.8.6 The proposed surface water drainage strategy is set out within the submitted Flood Risk Assessment with the proposed drainage plans included as an appendices.
- 6.8.7 Areas of hardstanding will be constructed as permeable paving with roofs, where possible draining directly to them.
- 6.8.8 Roof drainage on the eastern part of the site will drain to an infiltration blanket location in the central green space of the site, alongside a shallow infiltration basin above the infiltration blanket to cater for more extreme rainfall events.
- 6.8.9 Infiltration rates of 0.040m/hr and 0.011m/hr obtained from the site infiltration testing to inform the drainage design, with a factor of safety of 2 applied.
- 6.8.10 The proposed surface water drainage has been designed allow for a 40% allowance for climate change.
- 6.8.11 In terms of foul water drainage, a peak foul water flow of 3l/s has been calculated for the development, based on the daily flow rate of 4,000 litres per dwelling for the residential units totalling 2.59l/s and 0.4l/s for the doctor's surgery.
- 6.8.12 The foul water resulting from the development will be collected in a system of gravity sewers discharging into the existing foul water sewer, subject to the detailed design.
- 6.8.13 In terms of drainage maintenance, the onsite surface water will remain under the control of property owners or a site wide management company for shared areas who will be responsible for maintenance.
- 6.8.14 The proposed foul water drainage will be designed and constructed in accordance with Sewers for Adoption 7th Edition and will be offered to Southern Water who will maintain them in perpetuity.

## 6.9 ARCHAEOLOGY AND HERITAGE

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### Archaeology

- 6.9.1 The site is situated within an Area of Archaeological Potential, whereby paragraph 200 of the NPPF requires developers to submit an appropriate desk-based assessment (DBA).
- 6.9.2 Cultural Heritage DBA has therefore been prepared and is submitted alongside this application.
- 6.9.3 The DBA identifies the site as having a low archaeological potential for all periods of human activity, except for evidence of Post Medieval land division/agricultural activity, tree cultivations and deneholes. If present on the site, such remains would be concentrated in the southern end of the site outside the footprint of the existing buildings and hardstanding to the north.

- 6.9.4 The DBA suggests that if remains are encountered, they would be considered mostly of low (local) archaeological significance. Based on this, it is considered that should any further archaeological works be required, these could be dealt with via an appropriately worded planning condition.

#### Heritage

- 6.9.5 The site does not fall within a conservation area, nor does it contain any listed or locally listed buildings.
- 6.9.6 Three listed buildings lie with a 200m distance north of the site, which include Parrock Hall, Old Manor Parrock Manor and the Granary in the grounds of the former Old Manor. Owing to the distance and intervening built form it is considered that the site does not form part of the setting of these heritage assets and therefore the proposed development would not affect their significance. This was raised with Gravesham Borough Council during the pre-application stage who confirmed this.
- 6.9.7 There is an existing 3-storey Victorian Villa situated at the front of the site which is proposed to be retained and converted into flats as part of the proposed development. The building does not have any statutory or local designations and has been assessed having low heritage interest, however, does have some townscape interest.
- 6.9.8 The proposed development is seeking the temporary removal of a wall to the front of the site, outside of the Victorian building, to allow for the appropriate visibility splays to be achieved for vehicular access to the site. The heritage assessment concludes that as the building and the wall, albeit to be moved, are to be retained, its townscape interest would be preserved
- 6.9.9 The remaining buildings on the site to be demolished and replaced do not carry any townscape or heritage interest.
- 6.9.10 Based on the above, it is therefore considered that the proposals would not have the potential to affect the significance of any built heritage assets.
- 6.9.11 These conclusions have been made in accordance with Paragraph 200 of the NPPF.

## **6.10 NOISE**

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- 6.10.1 Policy CS19 of the Core Strategy requires new developments to be located, designed and constructed to avoid any adverse environmental impacts from pollution, including noise.
- 6.10.2 In summary, noise levels to the north of the site are higher, however, recommended internal noise levels can be achieved with medium specification acoustic double glazing and acoustic trickle ventilators.

- 6.10.3 It is unlikely that openable windows can be used as an overheating strategy for rooms which directly overlook Old Road East. Therefore, it is recommended that a detailed acoustics and overheating assessment is undertaken during the detailed design stages to ensure compliance with the internal noise requirements during the overheating condition.
- 6.10.4 The impact of transportation noise associated with the development on nearby existing noise sensitive receptors show that noise level increase is marginal. As such, it is considered that the noise level increase as a result of the development is not likely to unduly affect the nearest noise sensitive receptors.

## 7 SUMMARY AND CONCLUSION

### 7.1 SUMMARY

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- 7.1.1 This statement has been prepared in relation to a full planning application for 54 residential dwellings, a new GP surgery, new access road, internal roads, car parking, landscaping, drainage, public open space, and associated works.
- 7.1.2 The NPPF is clear that Local Planning Authorities should approach decision taking in a positive way to foster the delivery of sustainable development. This application has been prepared following pre-application discussions with the Local Authority, a public consultation with local residents, and a thorough analysis of site opportunities and constraints.
- 7.1.3 The proposed design has been carefully considered to ensure it is of a high quality and would not impact the surrounding character of the area. This application is supported by a suite of technical reports, confirming that there will be no adverse impacts on ecology, trees, heritage, archaeology, highways and flooding.

### 7.2 CONCLUSION

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- 7.2.1 Having regard to the above, it is considered that the proposals satisfy the development plan policies. As such, in line with paragraph 11 of the NPPF, the proposal represents a sustainable development and should benefit from the presumption in favour, being approved without delay.
- 7.2.2 Without prejudice to the above, Gravesham cannot currently demonstrate a five-year supply of housing, as required by the NPPF. The proposed development provides 54 new residential dwellings in a Borough that is currently not delivering their housing targets, which should be afforded great weight.
- 7.2.3 In addition to this, the proposal is meeting a significant need in the borough and providing a critical community service through the provision of a new GP surgery,
- 7.2.4 The proposed development is to be delivered through a high-quality design on a site that is currently vacant.
- 7.2.5 It is therefore respectfully requested that planning permission be granted, subject to appropriately worded conditions.