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Statement of Community Involvement

Former St Joseph's Preparatory School, Gravesend

CLIENT: GHL (Gravesend) Ltd

December 2023

MWB/LS/30509

CONTENTS

1	INTRODUCTION.....	2
1.1	PURPOSE OF THIS STATEMENT	2
1.2	STATEMENT STRUCTURE	2
2	PRE-APPLICATION ENGAGEMENT	4
2.2	JULY 2022 (REF. PRE20220155)	4
2.3	AUGUST 2023 (REF. PRE20230203)	5
	GBC Leisure	7
	GBC Highways Officer.....	7
	GBC Housing Strategy.....	7
	Waste and Recycling.....	8
	KCC Biodiversity	8
3	PUBLIC ENGAGEMENT.....	9
3.1	OVERVIEW	9
3.2	PUBLIC CONSULTATION WEBSITE.....	9
4	CONSULTATION FEEDBACK.....	13
4.1	OVERVIEW	13
4.2	FEEDBACK	13
5	APPLICANT RESPONSE TO CONCERNS.....	17
5.1	OVERVIEW	17
5.2	ACCESS	17
5.3	OVERDEVELOPMENT	17
5.4	AMENITY PROVISION	18
6	SUMMARY	19

Appendix 1 – July 2022 Pre-Application Advice

Appendix 2 – August 2023 Pre-Application Advice

1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Statement of Community Involvement ('SCI') has been prepared by DHA Planning on behalf of 'Galliard (Gravesend) Ltd' ('the Applicant') and sets out details of the pre-application consultation process and engagement carried out in respect of the planning application for the proposed mixed-use development at the former St Joseph's Preparatory School, Gravesend.
- 1.1.2 The full description of the proposed development is as follows:
- "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."*
- 1.1.3 The National Planning Policy Framework ('NPPF') (updated September 2023) encourages applicants to carry out pre-application consultation and community engagement prior to submitting planning applications to the Local Planning Authority ('LPA').
- 1.1.4 Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves the outcomes for the community (paragraph 39, NPPF). The more issues that can be resolved at pre-application stage, including the need to deliver improvements to infrastructure, the greater the benefits (paragraph 41, NPPF).
- 1.1.5 In addition, the NPPF gives weight and support to proposals where active community engagement has taken place. Paragraph 132 of the NPPF is clear that applications that can demonstrate early, proactive, and effective engagement with the community should be looked on more favourably than those that cannot.
- 1.1.6 The government's Planning Practice Guidance also includes a section on 'Before Submitting an Application' which sets out the process and expectation for pre-application discussions.
- 1.1.7 As such and in this case, the Applicant has engaged with the local community, LPA and other relevant consultees, resulting in a scheme which has sought to take into account the views of all parties as far as possible prior to the submission of a formal planning application.

1.2 STATEMENT STRUCTURE

- **Chapter 2** summarises the pre-application engagement that has occurred between the Applicant and the LPA, and any other external consultees.

- **Chapter 3** provides details of the public consultation carried out.
- **Chapter 4** analyses the feedback received from the public consultation website.
- **Chapter 5** sets out the Applicant's response to issues raised prior to the submission of the planning application.
- **Chapter 6** concludes the statement.

2 PRE-APPLICATION ENGAGEMENT

- 2.1.1 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 and support in-principle for the proposed indicative layout.
- 2.1.2 The key points from these discussions are outlined below and have been taken into account when finalising the proposed development.

2.2 JULY 2022 (REF. PRE20220155)

- 2.2.1 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

- 2.2.2 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.

2.2.3 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 this statement.

2.3 AUGUST 2023 (REF. PRE20230203)

- 2.3.1 A further scheme was tabled in August 2023 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.
- 2.3.2 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

2.3.3 A pre-application meeting was subsequently held with GBC Officers on 8th August 2023. At the time of writing, the full written advice from GBC was still awaited, however officers have provided interim advice and have considered variations to the layout, particularly in relation to the south western corner of the site.

2.3.4 The comments received to date 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.

2.3.5 The written advice is set out in full at **Appendix 2** of this statement.

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

- 2.3.7 Throughout the design development, the project team have maintained communication with the Case Officer at the Council as part of an ongoing and collaborative approach.

GBC Leisure

- 2.3.8 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.
- 2.3.9 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

- 2.3.10 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.
- 2.3.11 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

- 2.3.12 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.
- 2.3.13 In addition, they acknowledge that the applicant may claim exemption from the full affordable housing requirement based on 'Vacant Building Credit'.

GBC Waste & Recycling

- 2.3.14 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

- 2.3.15 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.
- 2.3.16 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.

3 PUBLIC ENGAGEMENT

3.1 OVERVIEW

- 3.1.1 From the outset, the project team's intention was to ensure as many people as practical in the local area were made aware of the planning application prior to its submission to GBC.
- 3.1.2 The project team produced an online public consultation website which provided the local community an opportunity to provide their feedback via email or an online form.
- 3.1.3 Prior to the launch of the public consultation website, the project team approached local ward members to outline the proposals and the intention to carry out a public consultation exercise.
- 3.1.4 All comments received by the Council Planning Officers and other stakeholders were considered in detail by the project team, with the necessary amendments made prior to submission. The comments received and their relevant responses are summarised below, however these are elaborated further within the submitted Design and Access Statement.

3.2 PUBLIC CONSULTATION WEBSITE

Notification Leaflet

- 3.2.1 The proposals were advertised to residents surrounding the site (see Figure 3.1) via a leaflet which was distributed in September 2023. A copy of this leaflet is provided in Figure 3.2 below.



Figure 3.1: Aerial Image of Distribution Area

Proposed development at:

FORMER ST JOSEPH'S CONVENT PREPARATORY SCHOOL

As a member of the local community, you are invited to provide feedback on proposals for a new development at the former St Joseph's Convent Preparatory School.



The proposed development will involve the retention and refurbishment of an existing Victorian building on the Old Road East frontage, returning it to its original residential use.

The remaining, non-historic school buildings will be replaced with a mixed-use development comprising a GP Surgery and new homes.

A website has been created to provide more details on the proposals, and to allow you to provide feedback. This can be found at:

www.stjosephsconventgravesend.co.uk

Should you have any questions, please do not hesitate to contact us at consultations@dhaplanning.co.uk



Figure 3.2: Copy of Public Consultation Leaflet

3.2.2 Overall, it is considered the consultation was suitably advertised.

Public Consultation Website

3.2.3 The public consultation website was launched, available at <https://www.stjosephsconventgravesend.co.uk/home>. This website featured the following pages:

- A welcome page setting out the applicant's intention to submit an application to GBC for the development of the site to provide new GP Surgery and 56 homes at the former St Joseph's Convent Preparatory School.
- Site and Location: A page outlining where the development would be located in respect of Old Road East.
- Proposals: A page outlining why the development is being proposed and how the scheme has been informed by technical analysis.
- Your Views: A feedback form page providing the community with an opportunity to provide their comments on the proposed development.



Figure 3.3: Home Page of the Consultation Website

4 CONSULTATION FEEDBACK

4.1 OVERVIEW

- 4.1.1 A variety of methods were provided for people to give feedback:
- (1) An online form on the consultation website.
 - (2) By email, to 'consultations@dhaplanning.com'.
- 4.1.2 A total of 52 members of the public completed the feedback forms on the public consultation website whilst two members of the public submitted feedback via email.
- 4.1.3 The feedback has been analysed to assess the residents overall views and concerns regarding the proposed development.
- 4.1.4 The team has continued to engage with residents throughout the design development, following closure of the website for comments.

4.2 FEEDBACK

Question 1: Which category best describes your interest in the proposals?

- 4.2.1 Of the responses received online, 50 of the respondents were local residents. The other respondents were alumni of St Joseph's Convent Preparatory School and a relative of a local resident.

Question 2: Do you support the idea of a new Medical Centre being provided in this part of Gravesend?

- 4.2.2 The graph below demonstrates that the majority of respondents support the idea of a new medical centre.

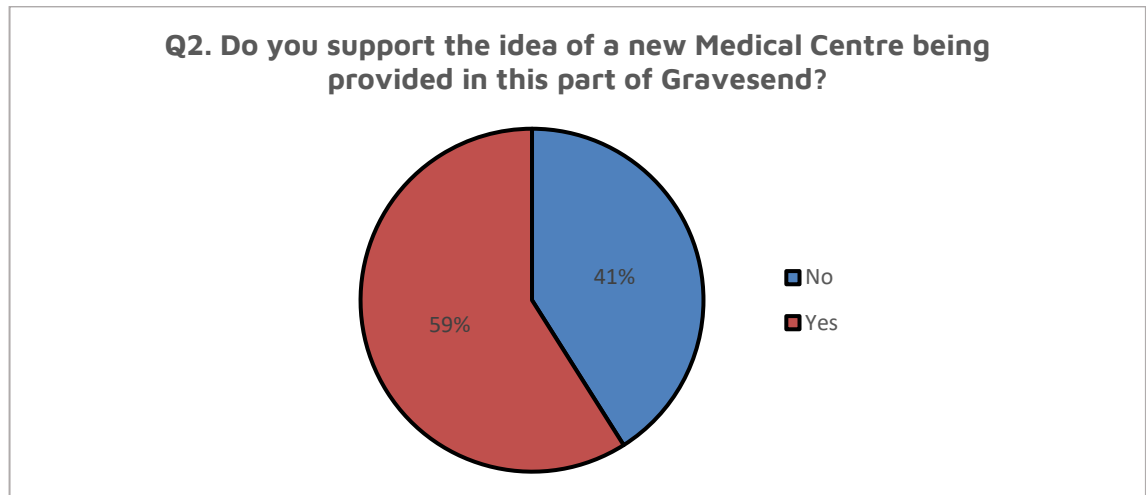


Figure 4.1: Responses to Question 2

Question 3: Do you support the creation of new family homes?

4.2.3 Of the respondents, half support the creation of new family homes.

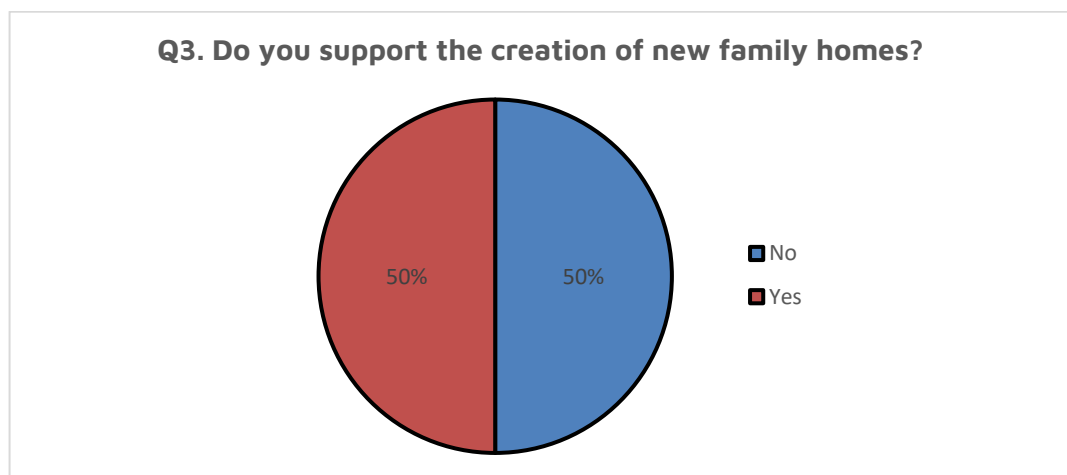


Figure 4.2: Responses to Question 3

Question 4: Any comments?

4.2.4 The top three most commonly cited themes refer to:

- (1) Traffic concerns;
- (2) The provision of much needed family homes, GP surgery and open space; and
- (3) The scale of the proposed development

4.2.5 A detailed textual analysis of responses to question two is listed in Table 4.1 below. These are listed from the most to least commonly raised themes:

COMMENT	NO. OF RESPONDENTS
Traffic concerns	
- The road network is already over capacity at peak times - Opposite a busy church where the congregation park on the road - The roundabout at Echo Square is only a short distance from the entrance - A second access would be more appropriate	16
Will supply much needed family homes, GP surgery & open space	12
Unsupportive of the proposed pedestrian access from Coombe Road	
This will encourage people to park in the no-through road which is already at capacity	8
Increase in foot traffic on a quiet residential cul-de-sac	
Overdevelopment – too many dwellings	7
Scale and bulk not in-keeping with the local vernacular	
- The flats are out of place - The area should be used to build a few large quality detached dwellings instead	6
Outlook, lighting and privacy concerns	6
Insufficient parking	6
Parking overspill on nearby roads	
Concerns about capacity of local services – education, healthcare, sewage etc.	6

Noise and air pollution from the new development	3
A new pedestrian crossing should be constructed on Old Road East	2
The Whitehorse Medical Centre should be utilised instead	1
Refurbishing the original building will retain a sense of the site's history	1
Drainage concerns	1
Current plans do not show waste locations or tracking requirements for refuse vehicles	1
No need for additional play area/open space – it will encourage teenagers to cause disturbance	1
The site should be reopened as a school	1

Table 4.1: Summary of comments received as part of Question 4

5 APPLICANT RESPONSE TO CONCERNS

5.1 OVERVIEW

- 5.1.1 The Applicant has taken on board the feedback received during the consultation and reviewed the comments raised. The key concerns of local residents and Planning Officers relate to:
- (1) Traffic and access:
 - (2) Overdevelopment; and
 - (3) Loss of amenity for existing residents in the locale.
- 5.1.2 The Design and Access Statement demonstrates in detail how the design of the proposed development has evolved as a result of pre-application engagement.
- 5.1.3 A summary of changes to the scheme as a result of pre-application engagement is provided as follows:

5.2 TRAFFIC AND ACCESS

- 5.2.1 The public consultation highlighted that the primary concern for local people is the resultant traffic and overcapacity of existing highways infrastructure.
- 5.2.2 The access for pedestrians and vehicles will be achieved via the existing entrance onto Old Road East, which provides sufficient visibility to serve the proposal and stops the development from being used as a cut through.
- 5.2.3 The primary principle behind the design of the streets is to create quiet residential roads. To mitigate vehicles driving into the residential streets in the south west of the site, vehicles from the GP surgery may only turn right out of the car park.
- 5.2.4 A detailed Transport Assessment has been prepared in support of the planning application which sets out how the traffic, highway and access safety concerns are being addressed. Importantly, the development is supported by a policy compliant provision of car parking, for the residential as well as the GP surgery, as supported by KCC and GBC Highways and as such there will be no unacceptable overspill parking onto surrounding roads.

5.3 SCALE OF DEVELOPMENT

- 5.3.1 The scale and height of the proposed development has been carefully considered to respond to the surrounding development, with the new apartments limited to the site entrance, alongside the existing Victorian building which is also three storeys. This is comparative to the existing properties fronting Old Road East.

- 5.3.2 Whilst the proposed GP building would increase the scale of development on site, care has been taken to ensure that the building is of an appropriate scale, for example through the use of a flat roof to reduce the visual prominence of the building. Overall, 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 site and the surrounding area.
- 5.3.3 From north to south, site levels drop by circa 3.5m and the proposed development will follow this gradient. The new-build houses are two-storeys with pitched roofs, comparative to the surrounding properties on Coombe Road and St Mary's Close.
- 5.3.4 The residential element is of a density which matches and reflects the surrounding character, whilst providing private amenity space for each dwelling and a generous provision of public open space for the development as a whole.

5.4 AMENITY PROVISION

- 5.4.1 One of the main issues highlighted at the pre-application meeting related to the orientation of dwellings in the south west corner of the site. Amenity was also extensively referred to within the public consultation comments.
- 5.4.2 Outlook and privacy have been considered, resulting in a change to the layout in the south west corner, with terraced houses split and rotated, as shown on the masterplan below. Views between the building and existing dwellings in St Mary's Close are at an oblique angle greater than 45 degrees to limit direct overlooking.
- 5.4.3 In addition, 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.



Original Masterplan



Updated Masterplan

- 5.4.4 The decision has been taken to include a high-quality external landscaping scheme, designed by Exterior Architecture, to include new tree planting and high-quality landscaped areas.

6 SUMMARY

- 6.1.1 This statement sets out details of the pre-application engagement carried out in respect of the planning application for the proposed mixed-use development at the former St Joseph's Preparatory School, Gravesend.
- 6.1.2 The consultation process has included the following:
- An initial pre-application meeting held with the project team and Planning Officer at GBC, with subsequent written advice provided;
 - A second pre-application meeting in August 2023, with subsequent informal written advice provided by email;
 - Publication of a public consultation website which outlined the proposals and provided local residents and businesses with the opportunity to provide their feedback. Approximately 1200 households and business within the immediate vicinity of the site were informed prior to the website being launched.
- 6.1.3 The Comments and suggestions received throughout the consultation process have been taken into account and, wherever practical and appropriate, incorporated into the proposed scheme.
- 6.1.4 The applicant and the project team are grateful to all local residents and stakeholders who took the time to assist with and engage in the consultation process.

APPENDIX

1



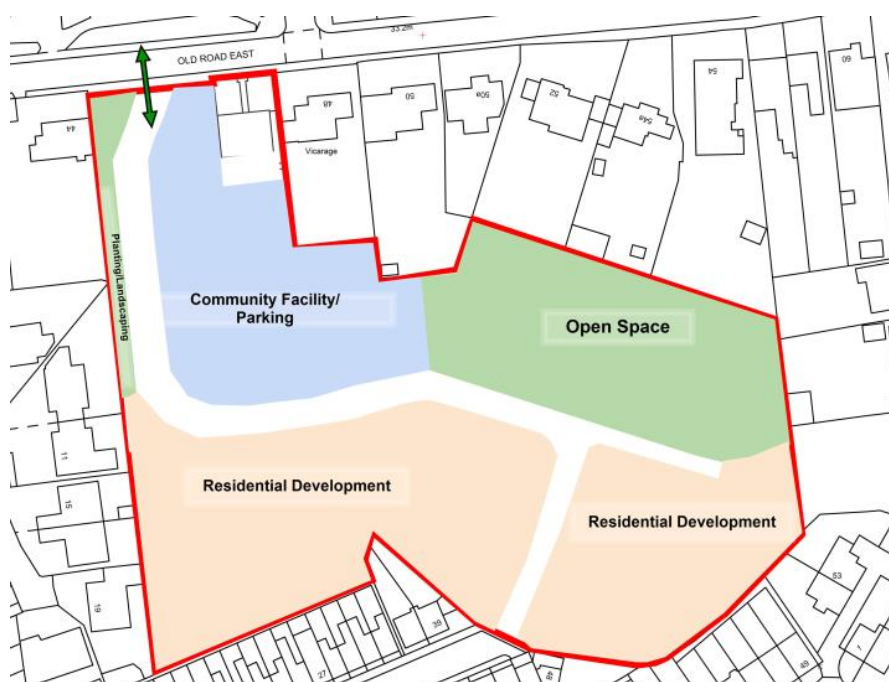
Pre Application Response

Reference	PRE20220155
Site	St Josephs Convent Preparatory School, 46 Old Road East, Gravesend Kent, DA12 1NR.
Proposed Development	Proposal redevelopment to provide a doctors surgery and other community facilities with new residential developments and the provision of approximately 5 flats. Creation of a formal road access onto Old Road East and potentially a secondary access onto Coombe Road
Case Officer Details	Mr Richard Hart E-mail: richard.hart@gravesham.gov.uk
Date of Advice	18 th July 2022

I am writing with reference to your request for pre-application advice at the above site, received as valid on 24th May 2022 and following your office meeting with Shazad Ghani (Service Manager) and Richard Hart (Team Leader) on 4th July 2022. I have now had the opportunity to review your proposal and can offer the following comments:

Proposal

As set out in your supporting covering letter (dated 6th May 2022) and your e-mail dated 20th June 2022 your proposal is to redevelop the land and buildings at the closed St Joseph's Convent Preparatory School to provide a mixed use development, consisting of a medical centre, open space and residential development. The indicative layout (revised 20th June 2022) is shown below, and the response is based on the below layout and the discussions that took place on 4th July 2022.



As set out in your covering letter and following clarification at the meeting your proposal would seek to convert the existing three storey Victorian buildings into residential apartments with a medical centre adjacent to this conversion and to the rear, with the remainder of the site being residential and open space.

Vehicular access would primarily be from Old Road East with a possible emergency access from Coombe Road.

Your enquiry consists of the following supporting information:

- Covering letter (6th May 2022)
- OS Plan
- Indicative Development Areas Plan (Revised 20th June 2022); and
- e-mail dated 20th June 2022.

Superseded documents

~~Indicative Development Areas Plan~~

Site Description

Access to the site is currently via a joint vehicular and pedestrian access off the southern side of Old Road East and the site is around 1.63ha in size. Within the site there are various structures with a 3 storey Victorian building at the northern end with other 20th century buildings further south on the site. The 20th century buildings are one and two storey with a number of portacabins behind these buildings.

As shown in the relevant planning history since 1948 the site has been subject to various planning approvals all related to the school use on the site.

To the west of these buildings is a tarmac school yard and associated parking. To the rear of the site is the associated playing fields.

The site is currently vacant following the closure of the school at the end of the 2020 / 2021 school year. The site has a frontage of around 40m onto Old Road East. Coombe Road on the south-western boundary of the site runs up to the site but there is no access onto Coombe Road.

From the site visit it is clear that the site is within an established residential area with dwellings from Laurel Avenue, Hillside Avenue, Hillside Drive, Old Road East, Coombe Road and St Mary's Close all backing onto the site. Many of the dwellings on these roads have been extended (either under permitted development or through planning approvals). When visiting the site it is clear that parts of the site are overlooked in numerous locations by dormer extensions (especially from some properties on St Mary's Close and Coombe Road).

The site is identified as an area of archaeological potential but is not adjacent to any conservation areas or within the setting of any listed buildings.

The site has a gradient with the northern portion of the site being at a higher level.

Old Road East is a classified Road and is served by public transport and the site is around 1 mile from Gravesend Town centre.

Wider afield the site is within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site which is highly protected and of international importance. It supports important numbers of wintering waterbirds and migrating birds.

Relevant Planning History

Reference	Description	Decision	Decision Date
20170837	Erection of a double classroom unit at the rear of the school.	Permitted	05.02.2003
20021017	Erection of a double classroom unit at the rear of the school.	Permitted	05.02.2003
19950580	Retention of the playground extension and the 15m long x 3.6m high fence extension on the western boundary of new playground.	Permitted	15.12.1995
19820396	Erection of single storey building to form 4 replacement classrooms store stockroom and linking corridor	Permitted	28.07.1982
19800488	Stationing of temporary class room block	Permitted	28.07.1980
19800260	Erection of two classrooms	Permitted	09.05.1980
19791127	Retention of a classroom dining room	Permitted	15.01.1980
19791005	Renewal of planning permission TH 2 72 25 for retention of cover over existing swimming pool	Permitted	06.12.1979
19791003	Retention of 4 temporary classrooms and a cloakroom at the rear	Permitted	21.11.1979
19791002	Retention of a mobile classroom	Permitted	21.11.1979
19781049	Renewal of planning permission TH 2 72 25 C for provision of a mobile classroom	Permitted	11.01.1979
19780896	Erection of chain link fencing 8 feet high on the eastern and western sided and 12 feet high on the northern and southern sides surrounding proposed double tennis courts at the rear	Permitted	25.01.1978
19750292	Siting of relocatable classroom	Permitted	13.05.1975
19740384	Continued use of 4 temporary classrooms and a cloakroom	Permitted	03.10.1975
19480214	Extension to school premises	Permitted	15.11.1948

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision.

One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014;
- Saved policies in the Gravesham Local Plan First Review, November 1994; and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy 2014:

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS09 – Culture and Tourism
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Design & Development Principle
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review 1994:

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T5 – New Accesses onto Highway Network
- LT6 – Additional Open Space in New Housing Development
- TC7 – Other Archaeological sites

National Planning Policy Framework 2021:

- Section 2 – Achieving sustainable development
- Section 6 – Building a strong, competitive economy
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 Meeting the challenge of climate change, flooding and coastal change.

Other Material Considerations

Supplementary Planning Guidance and other Documents:

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/planning/local-plan/3>

The following documents are relevant to the consideration of this enquiry:

- SPG4 – KCC Parking Standards (2006).
- Vehicle Accesses on Classified Highways (SPG6 November 1992)
- SPG2 - Residential Layout Guidelines (2020);
- Housing Standards Policy Statement 1st October 2015;
- Technical Housing Standards - Nationally Described Space Standards.
- Householder extensions /Alterations Design Guide (2021)
- Knight, Kavanagh & Page GBC Playing Pitch Strategy Assessment Report, June 2016
- Knight, Kavanagh & Page GBC Playing Pitch Strategy and Action Plan, August 2016

Officer's Analysis

Procedural Issues

The redline plan should include all the land required to accommodate the development. Any planning application will need to be supported by the relevant ownership certificate being served on the appropriate owners. This is required under Part 13 and Schedule 2 of the Town and Country Planning (Development Management Procedure) Order 2015. Further details can be found online at https://www.legislation.gov.uk/uksi/2015/595/pdfs/ukxi_20150595_en.pdf

Main Issues

The main issues relating to your proposal are discussed below under the following headings:

- Principle of Development
- Design, Character and Appearance
- Sustainable Drainage and Surface Water Run Off
- Contaminated Land
- Neighbouring Amenity
- Amenity of future occupiers
- Highways & Parking
- Affordable Housing
- Developer Contributions
- Ecology and Biodiversity
- Sustainability
- Heritage

Principle of Development

Policy CS02 of the Local Plan Core Strategy (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply. This engages the first part of footnote 7 of the National Planning Policy Framework (NPPF) 2021 and this means for decision-taking that planning permission for applications involving the provision of housing should be granted in line with the requirements of the NPPF Para 11(d) unless:

- i. the application of policies in this Framework (the NPPF) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken.*

On this basis, it could be argued that the proposed development for a net increase of residential units would offer a contribution towards meeting this local need and, accordingly, would weigh in support of the development. However, this has to be balanced against other requirements of the NPPF (2021) which requires development to add to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Paragraph 4.2.26 of the Policy CS02 (LPCS) maintains the LPA should do the following in planning decisions;

'Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in urban area...'

Policy CS02 (LPCS) prioritises development in the urban area, and identifies the urban area as a sustainable location for development where suitable sites should be brought forward for residential and other development.

The principle of development is therefore considered acceptable and complies with the objectives local and national planning policy.

Open Space / Playing Pitches

At this stage with only the indicative site plan available Gravesham Leisure & Resilience Manager is unable to provide any detailed comments on your proposal. However, to assist you he has stated the following:

It is positive that some of the playing field will be accessible for open space but more details would be required as to what its purpose and role will play as well as whether it will house play equipment etc. Off-site formal leisure contribution will be sought, but without occupancy numbers a figure at this stage cannot be given as part of the formal response.

Without any further detailed information, we are unable to provide any further detailed comments. I would suggest you engage with Sports England due to the potential loss of a playing field. Please note that the 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.

Details of how you can engage Sports England can be found online at

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

Loss of Social Infrastructure

Policy CS10 (LPCS) states where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available. 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 (LPCS).

Appropriate for Conversion (Victorian Building)

Policy CS14 (LPCS) stipulates that new housing development is expected to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Policy CS14 (LPCS) is supported by saved Policy H5 (LPFR) which relates to converting existing buildings to increase housing stock. Policy H5 (i) provides that buildings 'shall be in an appropriate area for conversion to flats, maisonettes, bedsitters and multiple occupancy.' It also notes that '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'. Policy H5 (ii) also notes that "the building shall be of such a size and arrangement as to be generally unsuitable for single family occupation".

It is considered that subject to the loss of social infrastructure being addressed the conversion of the building will be acceptable.

Without any detailed plans of the conversion I cannot provide any further details. however you will need to comply with the Gravesham adopted residential layout guidelines and the nationally prescribed space standards.

Design, Character and Appearance

Policy CS19 (LPCS) states that the design, layout and form of new sustainable development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The NPPF (2021) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make developments acceptable to communities (NPPF paragraph 126). The quality and character of the built environment is also important in making the Borough an attractive place in which to invest. Therefore, a balance is required between achieving an effective use of a site within a sustainable location, whilst safeguarding and improving the environment and protecting local amenity. At the level of individual sites and buildings, the environmental impact of new development can be minimised by reducing energy in use; minimising external pollution and environmental damage; reducing embodied energy and resource depletion; and minimising internal pollution and damage to health.

The bulk and massing of the proposed development will need to ensure it is appropriate in the context to the wider townscape, to adjoining buildings and space, and to human scale. The design and appearance of the proposed development will need to ensure that it is of townscape value and capable of enduring. It will also be important to ensure landscaping proposals carefully consider hard landscaping, planting and the need to retain any existing trees that enhance the overall character and appearance of the proposed development and local area.

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.

In regard to secure by design Kent Police have been consulted and have provided a list of 17 points which should be undertaken with any redevelopment of the site. In order to assist you I have attached this document as appendix 1.

Without any detailed plans I am unable to provide any further detailed guidance on design. However, I would strongly suggest any design of the development should take into account the design guidance set out at a national and local level including the relevant SPG guidance.

Once a scheme has been developed for this site, we would also recommend utilising Design South East's Design Review process, further details can be found at <https://designsoutheast.org/news/design-review-through-design-south-east/>.

Sustainable Drainage and Surface Water Run Off

Policy CS18 (LPCS) sets out the requirements for dealing with sustainable drainage and surface water run-off. Kent County Council (KCC) is the Lead Local Flood Authority. In addition, Southern Water and The Environment Agency would be formally consulted on any future planning application for this site.

As you have highlighted in your covering letter the site is located within flood zone 1 which means there is low probability of flooding. As highlighted by the Environment Agency on their flood mapping service

<https://flood-map-for-planning.service.gov.uk/>

You will need to do a flood risk assessment if your development is any of the following:

- *bigger than 1 hectare (ha)*
- *in an area with critical drainage problems as notified by the Environment Agency*
- *identified as being at increased flood risk in future by the local authority's strategic flood risk assessment*

- *at risk from other sources of flooding (such as surface water or reservoirs) and its development would increase the vulnerability of its use (such as constructing an office on an undeveloped site or converting a shop to a dwelling)*

If your development does not fall into any of these categories, you only need to download the flood map for planning on this page showing your flood zone to include in your planning application.

From the information provided a flood risk assessment would be required as the site is larger than 1 hectare.

You may wish to engage the pre-application services of KCC, Southern Water and the Environment Agency in order that you can address any of their potential concerns prior to submitting a formal application.

Details of the pre-application services can be found below.

KCC

<https://www.kent.gov.uk/environment-waste-and-planning/flooding-and-drainage/sustainable-drainage-systems>

Southern Water

<https://www.southernwater.co.uk/developing-building/planning-your-development>

Environment Agency

<https://www.lbbd.gov.uk/sites/default/files/attachments/Planning-advice-from-the-Environment-Agency-poster.pdf>

Contaminated Land

Policy CS19 (LPCS) and Section 11 of the NPPF (2021) requires new development to avoid adverse environmental impacts of land contamination and remediating contaminated land.

Due to the various 20th century buildings on the site and some of which you would be looking to demolish any future application would need to address any potential contaminated land issues. Whilst we can impose planning conditions any future application would need to be accompanied by a Phase 1 and 2 Geo-Environmental Assessment.

Subject to the above and the inclusion of relevant planning conditions to address any potential remediation issues there would be no conflict with local or national planning policy.

Neighbouring Amenity

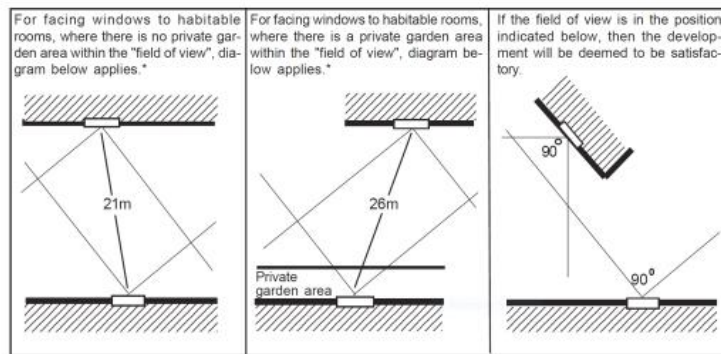
Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and the NPPF (2021) requires development to have a high standard of amenity for existing users (In this case surrounding properties).

As the proposal is located within an established residential area any development would need to ensure the privacy of surrounding properties is respected. I would draw to your attention privacy and distances and overshadowing in [SPG2](#) which is shown below:

Privacy distances and overshadowing

- 16 All applications for new dwellings (including flats) will be expected to comply with the Borough Council's privacy distances and guidance on overshadowing. The standards specified protect the privacy and amenity of the occupiers of existing and proposed dwellings and protect against loss of light and overshadowing from obstructing buildings.
- 17 Where windows of habitable rooms face each other (whether across a road, pedestrian way or private garden) a window-to-window distance of at least 21 metres should be provided. Habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms.
- 18 In addition, a minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling.
- 19 For "single aspect" dwellings, the minimum distance from the window of a habitable room to any house wall of equivalent height containing no habitable room windows can be reduced to 11 metres.
- 20 In all cases, the privacy distances will be applied on the basis of the principles set out in figure 1 on "fields of view" which are illustrated below.

Figure 1



* A 90° field of view is measured from the central point of a window of a habitable room on any elevation, to where it overlaps a 90° field of view from the central point of a window to a habitable room on any elevation of another property.

Furthermore, 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.

Amenity of future occupiers

A key consideration of the scheme would be whether the converted building and new build meets the appropriate standards in accordance with adopted guidance and the technical housing standards – nationally described space standard thereby avoiding the provision of cramped living conditions for the future occupants of the flats.

The accommodation should accord with the Council's Design and Development Principles Policy (CS19) and its layout guidelines contained within SPG2. Gravesham's standards are based on guideline minimum spaces for each room whereas the National Space Standard relates to the minimum gross internal area (GIA) of the overall unit to the design level of occupancy based on bedroom size and the potential number of bed spaces that could be accommodated.

Without any details of the proposed housing on site or how the existing building would be converted I am unable to provide any further guidance with the information that has been submitted.

Highways & Parking

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2021) states at paragraph 105 significant development should be focused

on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2021) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe

Any future application will need to be supported by a transport statement to enable both KCC and Gravesham Highways Officers to make a full assessment of any potential impact on the highway network. You 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 how acceptable visibility splays can be provided for the development.

Due to the potential scale of this mixed use development you are strongly advised to engage with Kent County Council Highway pre-application service prior to any application being submitted to this Council.

Details are as follows:

<https://www.kent.gov.uk/environment-waste-and-planning/planning-and-land/planning-applications/planning-advice/highway-pre-application-advice>

With regards to parking, careful consideration needs to be made for needs of the potential medical centre and the future residential occupiers of the development. I would draw to your attention Gravesham's adopted Parking Standards (2006) which can be viewed online at:

<https://www.gravesham.gov.uk/downloads/file/246/vehicle-parking-standards-july-2006-spg4>

The Government's technical guidance on electric vehicle charging is separately set out in [Approved Document S: infrastructure for charging electric vehicles](#), please see requirements S4 and S5.

You should also consider the future increase of secure and weather proof bicycle and tricycle parking as demand increases/changes to serve the wider development.

Refuse Storage and Collection Arrangements

Policy CS19 (LPCS) requires new development to incorporate facilities for the storage and recycling of waste generated. In order to ensure this proposal complies with Policy CS19 (LPCS) a refuse strategy should be included with any future application.

To assist you what would be required from Gravesham Waste Services I have attached Planning Guidance on Waste Collection Requirements (2022) as Appendix 2.

Affordable Housing

The Borough Council's position on affordable housing, as set out in Policy CS16 (LPCS) is that affordable housing will be required at a provision of 30% on sites in the urban area proposing 15 or more dwellings. Policy CS16 (LPCS) seeks a broad mix of 70% rented and 30% shared ownership (negotiable), although the tenure mix should meet local needs and achieve a socially inclusive development.

Developer Contributions

It is important to ensure that sufficient infrastructure is provided to meet the needs of new residents, employees and businesses in the Borough. As recognised in the NPPF (2021), the provision of new infrastructure is an important part of new development and the Council has worked with local service providers to identify their infrastructure needs over the plan period. Policy CS10 (LPCS) states that where new development generates a need for new infrastructure, developers will have to provide or contribute towards such provision, subject to viability consideration.

The following contributions are likely in terms of planning obligations, but without any details of the level

of development I cannot provide any further details at this stage.

1. Primary Education
2. Special Education Needs and Disability
3. Secondary Education
4. Libraries
5. Adult Education
6. Youth
7. Social Services
8. Leisure and Open Space
9. Health

Ecology and Biodiversity

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £275.88 per dwelling), applicants unwilling to pay this sum or being in close proximity to the SPA are required to undertake an appropriate assessment. This approach is approved by Natural England for all new residential developments.

The contributions would be secured as part of the wider S.106 agreement for any development on the site.

Further details of this can be found online at <https://www.gravesham.gov.uk/heritage-conservation/nature-conservation/2> and <https://northkent.birdwise.org.uk/>

To assist you on biodiversity KCC Biodiversity officer has been consulted and provided the following comments which you will need to take into account when developing the site.

No ecological information has been submitted for this site as part of this pre application submission. As a result of reviewing the data we have available to us (including aerial photos and biological records) and the information submitted with the planning application, we advise that further information is sought with regards to the potential for ecological impacts to arise as a result of the proposed development.

The site is a mixture of hard standing, buildings and potentially regularly cut grass in the middle of Gravesend. However 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.

As such, a preliminary ecological appraisal (PEA) must be undertaken by a suitably qualified ecologist, in accordance with good practice guidelines - the PEA will assess the habitats and features within and around the site and identify if there is a need for further ecological surveys to assess ecological value and/or confirm protected species presence/likely absence.

To ensure that any future planning application is adequately informed in respect of all potential ecological impacts, we advise that the PEA report, OR, if further surveys are required, an Ecological Impact Assessment (EclA) report, detailing all surveys and outcomes, must be submitted as part of the planning application. This is in accordance with paragraph 99 of ODPM 06/2005 which states: “it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”. An EclA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, so providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document.

Design

The ‘mitigation hierarchy’ described in British Standard BS 42020:2013, involves the following step-wise process:

- Avoidance – avoiding adverse effects through good design;*
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;*
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;*
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.*

We recommend that the ecological survey is carried out in advance of the design process to enable the results of the surveys to inform the design and enable the retention/protection of areas of ecological interest.

One of the principles of the National Planning Policy Framework is that “opportunities to improve biodiversity in and around developments should be integrated as part of their design” We advise that details of how the site will enhance biodiversity must be provided and we advise that this must include the inclusion of native species and ecological enhancement features within the site and buildings.

Biodiversity Net Gain

We highlight that the Environment Act will require a minimum of 10% biodiversity net gain and it is anticipated that it will be mandated by November 2023. Therefore there will be a need for future applications to demonstrate they are achieving a net gain of at least 10%. We recommend to future proof any planning application the ecological survey carries out the habitat mapping using UK HAB which is the mapping system used with Biodiversity Net Gain.

This will enable a BNG calculation to be carried out if required.

Sustainability

Gravesham Borough Council recognises the importance of sustainability and on 25 June 2019 at its Full Council meeting declared a climate emergency and this includes the target to make the borough Carbon Neutral by 2030.

Any future application should seek to deliver on site renewable energy and other appropriate mitigation, you are reminded of the need for any development on site to comply with Part S Building Regulations, further details which can be found online at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf

Heritage

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. However, I would suggest you contact KCC Heritage (Casper.Johnson@kent.gov.uk)

who will be able to provide you further guidance on this matter.

Summary

The principle of the development on this site is deemed acceptable, subject to you addressing the issues around loss of social infrastructure, engaging with Sports England regarding the potential loss of playing pitches and addressing highway issues.

As outlined in this letter you will need to ensure that you provide the sufficient supporting information in order to address the comments in this letter and you are strongly advised to engage with the **relevant external consultees prior to submitting this application**.

If you wish to formally establish the development is acceptable on site I would recommend an outline application is submitted for the site with all matters reserved accept access, an application for the conversion can be brought forward separately. As ensuring safe and suitable access to the site will be crucial this needs to be addressed at the outline stage. **For the avoidance of doubt the application should only be submitted once you have concluded your pre-application enquiry with KCC Highways and have resolved all potential highway issues.**

Next Steps

If planning permission is sought, an application can be made through the Planning Portal, here:

<https://www.planningportal.co.uk/applications>

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at:

<https://www.gravesham.gov.uk/downloads/file/383/local-validation-list>

Prior to submitting a planning application, you may wish to engage the services of planning agent;

<https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website;

<https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application-service>

You are advised that **PRE20220155** is now closed.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.

Appendix 1 – Kent Police (Secure by Design Guidance)

Appendix 2 – Planning Guidance on Waste Collection

APPENDIX

2





Pre-Application Response

Reference	PRE20230203
Site	St Josephs Convent Preparatory School, 46 Old Road East, Gravesend, Kent, DA12 1NR
Proposed Development	Proposal for 54 residential units and a medical centre. It is proposed to convert the existing Victorian school building to 5 flats alongside 5 new build apartments and 44 2 and 3 bedroom houses.
Case Officer Details	Mr Ethan Bonthron E-mail: ethan.bonthron@gravesham.gov.uk
Date of Advice	13 November 2023

I am writing with reference to your request for pre-application advice at the above site, received as valid on 13th July 2023.

I have now had the opportunity to review your proposal, following our pre-application meeting on 8th August 2023, and can offer the following comments:

Site Description

Access to the site is currently via a joint vehicular and pedestrian access off the southern side of Old Road East and the site is around 1.63ha in size. Within the site there are various structures with a 3 storey Victorian building at the northern end with other 20th century buildings further south on the site. The 20th century buildings are one and two storey with a number of portacabins behind these buildings.

As the planning register shows the site has been subject to various planning approvals all related to the school use on the site.

To the west of these buildings is a tarmac school yard and associated parking. To the rear of the site is the associated playing fields.

The site is currently vacant following the closure of the school at the end of the 2020 / 2021 school year. The site has a frontage of around 40m onto Old Road East. Coombe Road on the south-western boundary of the site runs up to the site but there is no access onto Coombe Road.

From the site visit it is clear that the site is within an established residential area with dwellings from Laurel Avenue, Hillside Avenue, Hillside Drive, Old Road East, Coombe Road and St Mary's Close all backing onto the site. Many of the dwellings on these roads have been extended (either under permitted development or through planning approvals). When visiting the site it is clear that parts of the site are overlooked in numerous locations by dormer extensions (especially from some properties on St Mary's Close and Coombe Road).

The site is identified as an area of archaeological potential but is not adjacent to any conservation areas or within the setting of any listed buildings.

The site has a gradient with the northern portion of the site being at a higher level.

Old Road East is a classified Road and is served by public transport and the site is around 1 mile from Gravesend Town centre.

Proposal

This pre-application proposes the redevelopment of the former school site, to create 54 residential units

and a medical centre. This would involve the conversion of the existing Victorian school building into 5 flats, the construction of a new block of 5 apartments and the erection of 44 dwellinghouses. The medical practice building would be 3-storeys and 1350m².



Relevant Planning History

Reference	Description	Decision	Decision Date
20170837	Erection of 2no. changing rooms and shower room, storage area and a linked canopy.	PERMITTED	30.10.2017
20021017	Erection of a double classroom unit at the rear of the school.	PERMITTED	05.02.2003
19950580	Retention of the playground extension and the 15m long x 3.6m high fence extension on the western boundary of new playground.	PERMITTED	15.12.1995
19820396	Erection of single storey building to form 4 replacement classrooms store stockroom and linking corridor	PERMITTED	28.07.1982
19800488	Stationing of temporary class room block	PERMITTED	28.07.1980
19791127	Retention of a classroom dining room	PERMITTED	15.01.1980
19791005	Renewal of planning permission TH 2 72 25 for retention of cover over existing swimming pool	PERMITTED	06.12.1979
19791003	Retention of 4 temporary classrooms and a cloakroom at the rear	PERMITTED	21.11.1979

19791002	Retention of a mobile classroom	PERMITTED	21.11.1979
19780896	Erection of chain link fencing 8 feet high on the eastern and western sided and 12 feet high on the northern and southern sides surrounding proposed double tennis courts at the rear	PERMITTED	25.01.1978
19781049	Renewal of planning permission TH 2 72 25 C for provision of a mobile classroom	PERMITTED	11.01.1979
19750292	Siting of relocatable classroom	PERMITTED	13.05.1975
19740384	Continued use of 4 temporary classrooms and a cloakroom.	PERMITTED	03.10.1974
19480214	Extension to school premises	PERMITTED	15.11.1948

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision.

One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014;
- Saved policies in the Gravesham Local Plan First Review, November 1994; and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS09 – Culture and Tourism
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

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

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T5 – New Accesses onto Highway Network
- LT6 – Additional Open Space in New Housing Development
- TC7 – Other Archaeological sites

National Planning Policy Framework (2023)

- Section 2 – Achieving sustainable development
- Section 6 – Building a strong, competitive economy
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – Meeting the challenge of climate change, flooding and coastal change.

Other Material Considerations

Supplementary Planning Guidance and other Documents

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/local-plan-policy/supplementary-planning-guidance>

The following documents are relevant to the consideration of this enquiry:

- SPG2 – Residential Layout Guidelines (2020).
- SPG4 – KCC Parking Standards (2006).
- Householder Extensions/Alterations Design Guide (2021)
- Technical Housing Standards – nationally described space standard (2015);
- KCC Developer Contributions Guide (2023) - <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/developer-contributions-guide>

Consultees

Internal Consultees

GBC Leisure Services -Policy CS13 and the NPPF recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. It is noted positively that the development will maintain an element of informal play provision/kick about area/community green etc. The council would be happy to offer further advice via the Parks & Open Spaces Team with the developer prior to the formal application process on the scale and size of the play equipment, bearing in mind that a wide range of age groups for use of the equipment are mentioned within the pre-application document, including teenagers etc. Due to the size of the development, it may not be suitable in this instance to cover such a wide range of age groups and formal equipment types (LAP and LEAP areas) and so a discussion on the width and breadth of provision would be recommended.

With regards to the impact of the development itself, it would not be expected for the developer to provide on-site formal leisure provision, but it is reasonable to expect the applicant to offset the impact of the increased population that the development will generate onto the existing leisure facility infrastructure within the area. The approach promoted by officers for this element is to secure a financial contribution towards the upgrading and development of existing local sporting and recreational facilities. Based on all the assessment data currently available including, the Open Space, Sport & Recreation Assessment, Sport England's Facilities Planning modelling and Active Places database, there is a particular shortage for

example, with swimming pool hall space linked to the overall ageing leisure centre facility stock at Cygnet Leisure Centre in particular, and Cascades Leisure Centre, of which a new leisure centre is currently being designed and developed at Cascades. Using Sport England's Sports Facility Calculator (SFC), and if we assume 2.5 residents per dwelling (x 54), this gives a contribution from the proposed development of £68,418.

The main overriding issue from a leisure perspective regarding the pre-application proposal relates to the actual development on formal amenity playing field land, which was also used for weekend community use by local football clubs in the past, such as Gravesham Borough Youth FC etc. There is an overall shortfall of pitches within the borough, especially junior pitches to satisfy current but also future demand. This is supported by the increasing number of junior teams and associated leagues that contact the council during the year, looking for local sites to access. To avoid an objection, the Leisure Team will therefore consider mitigation for the loss of the pitches themselves, based on industry standard costs for grassed pitch replacement (x2) to support existing and new projects that provide enhancements to current playing pitch facility stock. Projects that this contribution could be put towards include ancillary provision improvements at Kings Farm Playing Fields or towards future 4G pitch provision within the borough, in partnership/consultation with the Kent FA. With regards to a contribution amount towards off site provision, the loss of the pitch would be £60,000. This is an estimated cost of provision for grass pitches as outlined within the Sports England Facilities cost document (2022 Q3) for 2 x mini U7/U8 pitches. Payment should be made at an early phase of the development and should be received in full.

GBC Housing Strategy -

- The development proposes development of 54 new homes.
- Policy CS16 applies as follows - *the provision of affordable housing will be required on all new housing. developments of 15 dwellings or more or on sites of 0.5 hectares or more in the urban areas*
- The percentage requirement for the affordable housing is also detailed in CS16 as follows - *the amount of affordable housing to be provided by private housing. Development sites above the threshold will be 30%*
- The tenure mix for the affordable housing is also detailed in CS16 - *the Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.*
- The Council will therefore be seeking 16 homes for affordable housing. Of these 11 should be for affordable or social rent and 5 for shared ownership
- It is noted that there are some 1 bed 'conversions' in the scheme. The documents do not show the numbers of 1 bed conversions proposed. The applicant may therefore claim exemption from the full affordable housing requirement based on 'vacant building credit'. We may need to appoint an expert, at the developer's expense, to assess any such claim for deviation from the full affordable housing requirement.
- Affordable housing will need to be secured through a Section 106 Agreement.
- The affordable housing should be built to 'wheelchair accessible and adaptable' standards, Part M4(2) of the Building Regulations.
- It is suggested that the developer has early engagement with RP's working in the Gravesham Borough during the development process to secure a partner for the affordable housing delivery.

GBC Environmental Protection - awaiting full pre-application comment (however Debbie Wilder sent preliminary thoughts to Rebecca Tilley 06/09/2023). The full comment from GBC Environmental Protection will follow.

GBC Waste and Recycling Manager -

1. The design of the road layout does not allow for refuse vehicles to access the whole site, there is no turning head at the Coombe Road end which means our collection vehicle cannot safely manoeuvre around the Coombe Road end of the site. If this is road layout, then residents would need to bring their bins to the doctors surgery end of the road shown in red.



2. There is no detail on where the refuse and recycling bins will be stored, most of the properties are terraced so bins would have to be stored at the front of the property. Looking at the properties shown below, the only place to store bins would be under the front window.



3. The different types of road surface would need to be sufficient enough to take the weight of a 26 tonne vehicle each week.
4. A vehicle tracking / movement plan should be provided in a future application.

The detail of GBC Waste requirements can be found in Appendix 1.

GBC Highways Officer - The application refers to the use of Highway Consultants but does not appear to present any of their findings directly. The following comments are therefore general but will apply to the site.

1. Given the number of dwellings a main access and a secondary access is required. This is to ensure uninterrupted access for fire engines as well as other emergency services and a through route for refuse vehicles, as no on site turning is provided. The alignment will have to be justified using appropriate tracked vehicle drawings for a large refuse vehicle (approximately 12 metre in length).
2. It is noted that in general dwelling 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. Note The Kent Design Guide suggest at least a 20% parking provision based on the number of dwellings should be made for visitors which can be on street, or perhaps in the medical centre if the use of the medical centre permits.
3. Adopted Planning Guidance requires cycle parking to be provided for both dwellings and the medical centre. The rate of provision is one cycle space per flat and one space per bedroom for houses. The

medical centre would require one cycle space per two consulting rooms. Note some provision should allow for adaptive cycles particularly in the case of the medical centre.

4. Visibility splays at the access should comply with Manual for Streets. Old Road East is subject to a 30mph speed limit so 43m x 2.4m x 43m will suffice.
5. The design speed for the new estate road should not exceed 20mph and ideally 15mph and appropriate traffic calming may be required, particularly on the straight stretches of the road. The Kent Design Guide suggests for a 15mph environment, the distance between speed restraint features should be about 40metres increasing to 60 metres for 20mph.
6. Visibility at the accesses within the development should conform to the design speed as described in the Kent Design Guide. This may be an issue for the flats at the front of the development due to the road alignment restricting visibility.
7. Care must be exercised in the design to ensure the new estate road does not become a rat run option for traffic wishing to avoid any queues on the approach to the Echo Square roundabout.
8. The use of shared spaces is no longer considered appropriate as this can disadvantage those with a visual impairment, shallow kerbs at least should be provided alongside all footways and should be associated with serving the housing as well as the open space and play park.
9. Given the mix of development it is considered a Transport Statement would be appropriate
10. It is suggested the applicant should contact Kent County Council to discuss the Highway Authorities requirements.

GBC Parking Services

1. To ensure there is ample parking for residents and visitors, as well as ample off-street parking for visitors to the proposed medical centre.
2. We would need to make an amendment to the Traffic Regulation Order (TRO) on Old Road East to remove the existing school restrictions and replace them with suitable restrictions so would recharge this to the developers at a cost of £2850.

External Consultees

KCC Biodiversity - No ecological information has been submitted for this site as part of this pre application submission. As a result of reviewing the data we have available to us (including aerial photos and biological records) and the information submitted with the planning application, we advise that further information is sought with regards to the potential for ecological impacts to arise as a result of the proposed development.

The site is a mixture of hard standing, buildings and potentially regularly cut grass in the middle of Gravesend. However 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.

As such, a preliminary ecological appraisal (PEA) must be undertaken by a suitably qualified ecologist, in accordance with good practice guidelines - the PEA will assess the habitats and features within and around the site and identify if there is a need for further ecological surveys to assess ecological value and/or confirm protected species presence/likely absence.

To ensure that any future planning application is adequately informed in respect of all potential ecological impacts, we advise that the PEA report, OR, if further surveys are required, an Ecological Impact Assessment (EclA) report, detailing all surveys and outcomes, must be submitted as part of the planning application. This is in accordance with paragraph 99 of ODPM 06/2005 which states: "it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision". An EclA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, so providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document.

Design - The 'mitigation hierarchy' described in British Standard BS 42020:2013, involves the following step-wise process:

- Avoidance – avoiding adverse effects through good design;
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

We recommend that the ecological survey is carried out in advance of the design process to enable the results of the surveys to inform the design and enable the retention/protection of areas of ecological interest.

Under section 40 of the NERC Act 2006 and paragraph 174 of the NPPF 2021, biodiversity should be maintained and enhanced through the planning system. We advise that details of how the site will enhance biodiversity must be provided and we advise that this must include the inclusion of native species and ecological enhancement features within the site and buildings.

Forthcoming Legislation - Under the Environment Act 2021, all planning applications in England (with a few exemptions) will have to deliver at least a 10% biodiversity net gain. It is anticipated that it will be a requirement for all major applications from November 2023 and all minor applications from April 2023. Once mandatory, the latest Defra biodiversity metric will need to be used to demonstrate a minimum 10% biodiversity net gain. Local policy may require a higher level of net gain. Habitats created/enhanced to achieve net gain will need to be secured for at least 30 years.

Designate sites - The development includes proposals for new dwellings within the zone of influence (6km) of The Swale Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site). Gravesham BC need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A recent decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full 'appropriate assessment' is needed under the Habitats Directive. Therefore, we advise 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 this application.

KCC Flood & Water Management - No comment received, however KCC Flood and Water Management offer a pre-application advice service and more information can be found following this link:
https://www.kent.gov.uk/_data/assets/pdf_file/0017/101384/Pre-application-advice-guidance.pdf

KCC Heritage & Conservation - No comment received.

Kent Fire & Rescue - I can confirm that on this occasion it is my opinion that the emergency access requirements for the Fire and Rescue Service under the above Act appear to have been met.

Fire Service access and facility provisions are also a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

Officer's Analysis

Principle of Development

The principle considerations in the assessment of this application are:

- Housing Need
- Density of Development
- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity
- Parking and Highways
- Any Other Material Planning Considerations
 - Affordable Housing, Planning Obligations and Development Viability
 - Ecology and Biodiversity (Bird Mitigation)
 - Sustainable Urban Drainage and Surface Water Run Off
 - Sustainable Development
 - Refuse Arrangements
 - Contaminated Land
 - Noise
 - Financial Benefits

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Carnwath as part of the Supreme Court decision stated,

"It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than "guidance" and as such a "material consideration" for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme."

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023, it demonstrates that based on data up for the period 2022-2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2023). This requires that in regard to housing development, planning permission should be granted 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.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 182)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- Areas of Outstanding Natural Beauty
- Irreplaceable habitats
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 68)
- Areas at risk of flooding or coastal change.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 125(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development for a net increase of '54' residential units would offer a significant contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the Development Plan and NPPF (2023) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Design, Character and Appearance

Policy CS19 (LPCS) states that the design, layout and form of new sustainable development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The NPPF (2023) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make developments acceptable to communities (NPPF paragraph 126). The quality and character of the built environment is also important in making the Borough an attractive place in which to invest. Therefore, a balance is required between achieving an effective use of a site within a sustainable location, whilst safeguarding and improving the environment and protecting local amenity. At the level of individual sites and buildings, the environmental impact of new development can be minimised by reducing energy in use; minimising external pollution and environmental damage; reducing embodied energy and resource depletion; and minimising internal pollution and damage to health.

For the purpose of this pre-application report, the assessment of different buildings within the development will be considered separately:

Retention of the Victorian Building (school block)

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 East and take into account the land level differences throughout the site and surrounding build form.

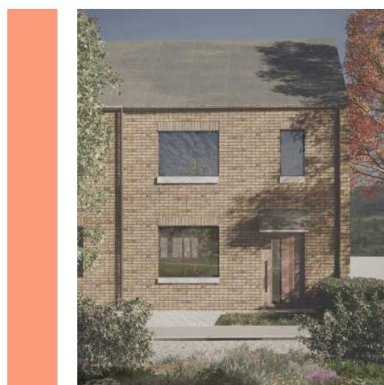
New Flat Block



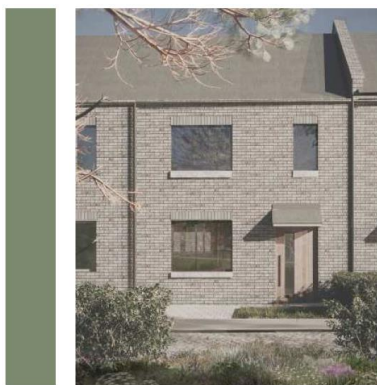
The height profile of the building is considered to be acceptable, following the land level difference on Old Road East sloping down towards Echo Square. The choice of brick and render, with bay windows is acceptable, however it is considered that a similar colour of render to the existing Victorian building would be more appropriate than the dark colour proposed and compliment the characteristics within the wider street scene.

The block would have a flat, table-top roof, which is prominent given the location of the building fronting Old Road East and would be adjacent to a gap in built form. The Local Planning Authority do not support applications proposing flat roofs above single storey level by virtue of their bulky and incongruous appearance. Therefore, it is encouraged that the roof form of the block is reconsidered and a pitched roof form is utilised. The street scene has a strong characteristic of traditional ridges and pitched roofs.

Houses



London Stock Brick



Light Grey Brick



Selected Dark Brick

The houses in the development would have similar characteristics and uniformity in design, with the exception of different choices of brick to respond to other parts of the wider site. The plan below demonstrates the location of each different style of dwelling, where the choice of brick matches key landmark buildings, such as the medical centre and new flat block.



The scale and distribution of the houses are considered acceptable.

Medical Practice



The proposed medical practice would be a three storey flat roof building, positioned behind the Victorian school building. There are concerns with the scale and massing of the building, which would appear boxy and bulky when viewed in context against the dwellinghouses and other build form in the wider area (as demonstrated in the 3D visualisations below:



The above CGI drawing highlights the concerns of the LPA, with the medical practice appearing to be dropped into the middle of the site and emphasises the need for a more considered approach to ensure that the building integrate with the wider context. Moreover, this CGI fails to demonstrate the topography of the site and cross-section drawings are vital to understand how the development would relate to the surrounding buildings.

Notwithstanding the concerns with its scale, the building may be screened from most public vantage points outside of the site and it was stated in the meeting that the floorspace provided is the minimum required. However detailed justification relating to this would need to be submitted in any future application. Nevertheless, it is encouraged that the building is scale back or redesigned as it would likely be an overly dominant feature for properties on Coombe Road due to the topography of the area and it being at an elevated position.

Concluding design comments:

Generally, the design, scale and distribution of development on the site is considered to be acceptable. However, there is scope to improve the appearance and design of the flat block, which is an important aspect of the development, framing the entrance and is a focal building. Moreover, the medical practice is out of scale with its surroundings and lacks articulation, resembling a three storey box, which should be reconsidered and improved, as well as be supported by clear justification in a future planning application.

Amenity of Future Occupiers

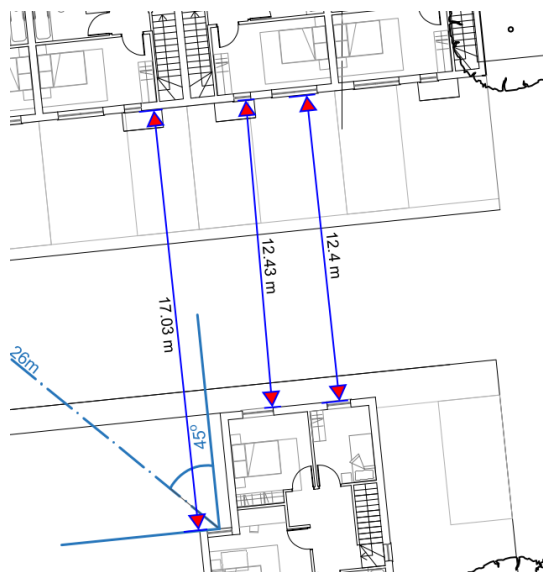
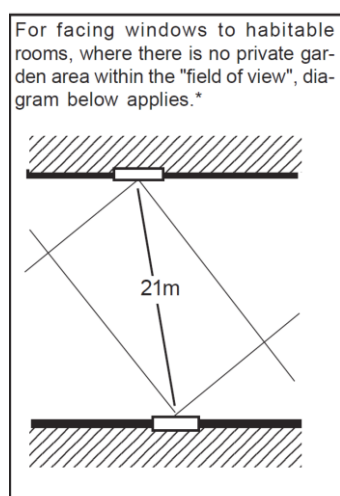
A key consideration of the scheme would be whether the converted building and new build meets the appropriate standards in accordance with adopted guidance and the technical housing standards – nationally described space standard thereby avoiding the provision of cramped living conditions for the

future occupants of the flats.

The accommodation should accord with the Council's Design and Development Principles Policy (CS19) and Gravesham's Residential Layout Guidelines (RLG) (2020) contained within SPG2. Gravesham's RLG is based on guideline minimum spaces for each room whereas the National Space Standard relates to the minimum gross internal area (GIA) of the overall unit to the design level of occupancy based on bedroom size and the potential number of bed spaces that could be accommodated.

Without any details of the internal layout of the proposed dwellings or how the existing building would be converted I am unable to provide any further guidance with the information that has been submitted. However, these should accord with both local and national living standards.

It is noted from the 'field of view' plans that the window-window distances between the terrace and the three bedroom dwelling falls below the minimum 21m required in Gravesham's RLG.



The privacy of future occupants of the site should be carefully considered and the window-window distance addressed. It is unclear from the information provided what the window-window distances would be between the terraces, this should also accord with the RLG and planting of trees/hedging should not be used to overcome privacy issues, as this is not a long term solution.

Moreover, the private amenity space of the 3 bedroom dwelling will be directly overlooked by windows on the rear dormer of the property on St Mary's Close, which would be to the detriment of future occupier amenity.



This is a consideration for the private amenity space of the terraced properties, as properties on St Mary's Close have permitted development rights and could erect dormer windows without planning permission.

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and the NPPF (2023) requires development to have a high standard of amenity for existing users (In this case surrounding properties).

In the pre-application meeting officers expressed concern with direct overlooking impacts for properties on St Mary's Close. Following the meeting, a revised masterplan and window-window distance drawings were submitted, to safeguard the amenity of those properties. This involved removing no.2 two bedroom dwellings, reorientating the southern terrace and altering the position and layout of the three bedroom dwelling on the south western edge of the site. These changes are considered to safeguard the privacy of the properties on St Mary's Close. However, as set out above, the window-window distance between the three bedroom and two bedroom properties on the terrace falls below the RLG minimum.

Without a measurable scale on the masterplan, it is unclear of the window-window distance of the properties on the south-eastern edge of the site. This should also be 26m in accordance with the RLG.

Highways & Parking

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2023) states at paragraph 105 significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2023) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe

In relation to parking and highways matters, I would like to draw your attention to the consultee responses from GBC Highways and GBC Parking Services:

Highways

GBCs Highway Officer raised a number of considerations for the proposals which are provided in full above. However, for reference these have been summarised as follows:

- A secondary access could be required, to ensure uninterrupted access for emergency services, refuse vehicles etc. If this option is sought, care should be taken to ensure that the estate does not become a throughfare/rat run
- The number of visitor parking spaces should be defined – this is for both the medical centre and for residential properties
- Secure cycle parking should be provided in accordance with adopted parking guidance (SPG4)
- Visibility splay at access should be 43m x 2.4m x 43m
- Visibility splays for accesses within the development must conform to guidance
- Traffic management and speed restraint features should be installed to keep speeds within the development to 15-20mph
- Shared spaces are not appropriate for accessibility reasons and for those with visual impairment

- Shallow kerbs should be provided along all footways
- A Transport Plan should be submitted

Prior to submitting a planning application and due to the scale of the development, you are strongly advised to engage with Kent County Council Highway pre-application service prior to any application being submitted to this Council. Details are as follows - <https://www.kent.gov.uk/environment-waste-and-planning/planning-and-land/planning-applications/planning-advice/highway-pre-application-advice>

Parking

GBC Parking Services were consulted and their comment is provided in full above. To summarise the key points are as follows:

- Ample parking should be provided for residents/visitors and those using the medical centre
- A fee is required for changing the restrictions on the roads

I would draw to your attention Gravesham's adopted Parking Standards (2006) which can be viewed online at:

<https://www.gravesham.gov.uk/downloads/file/246/vehicle-parking-standards-july-2006-spg4>

Further to the considerations from Parking Services, the LPA have concerns with the parking provision. Notwithstanding the parking standards, more consideration is needed to mitigate against a vehicle dominated estate and future proof the development. As a mixed use development, there will be competition for spaces from residents and visitors, as well as those using the medical centre (patients and staff).

Any future application needs to provide clear information regarding the staff expected to occupy the medical centre and the number of patients, as well as possible opening times (e.g. evening and weekend practice). There should be spaces provided for visitors of the residential properties, clearly shown on the plans. There are concerns that the parking arrangement may not be suitable.

Any Other Material Planning Considerations

Affordable Housing, Planning Obligations and Development Viability

The Borough Council's position on affordable housing, as set out in Policy CS16 (LPCS) is that affordable housing will be required at a provision of 30% on sites in the urban area proposing 15 or more dwellings. Policy CS16 (LPCS) seeks a broad mix of 70% rented and 30% shared ownership (negotiable), although the tenure mix should meet local needs and achieve a socially inclusive development.

It is important to ensure that sufficient infrastructure is provided to meet the needs of new residents, employees and businesses in the Borough. As recognised in the NPPF (2023), the provision of new infrastructure is an important part of new development and the Council has worked with local service providers to identify their infrastructure needs over the plan period. Policy CS10 (LPCS) states that where new development generates a need for new infrastructure, developers will have to provide or contribute towards such provision, subject to viability consideration.

The following contributions are likely in terms of planning obligations, but without details cannot be provided at this stage.

- Primary Education
- Special Education Needs and Disability
- Secondary Education
- Libraries
- Adult Education

- Youth
- Social Services
- Leisure and Open Space
- Health

You are advised to review KCC Development Contributions Guide for more information, this can be found by following this link - <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/developer-contributions-guide>

Vacant Building Credit - a query was raised in the pre-application meeting relating to vacant building credit. Vacant Building Credit is effectively an incentive for brownfield development on sites containing vacant buildings as contained in Paragraph 26 of the NPPG. This is a financial equivalent applicable to a vacant building being brought back into any lawful use, or that is being demolished and replaced by a new building. It is calculated based on the difference in floorspace between the existing vacant building and the proposed replacement building. Where there is an overall increase in floorspace in the proposed development, the Local Planning Authority should calculate the amount of affordable housing contributions required from the development reference in Policy CS16 (LPCS). A 'credit' is then applied whereby the existing floorspace is taken away from the proposed floorspace, and the housing provision is only applied to the additional floorspace.

This calculation cannot be undertaken with the information provided within this pre-application.

Open Space / Playing Pitches

Gravesham Leisure and Resilience Manager provided comment on this proposal, which is provided in full above, but highlighted that it is positive *"that the development will maintain an element of informal play provision/kick about area/community green etc. The council would be happy to offer further advice via the Parks & Open Spaces Team with the developer prior to the formal application process on the scale and size of the play equipment"*.

However, the main issue with the development is the loss of formal amenity playing field and as such you are encouraged to engage with Sports England due to the potential loss of a playing field. Please note that the 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. Details of how you can engage Sports England, who have their own pre-application service, can be found online at: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

Ecology and Biodiversity (Bird Mitigation)

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £314.05 per dwelling), applicants unwilling to pay this sum or being in close proximity to the SPA are required to

undertake an appropriate assessment. This approach is approved by Natural England for all new residential developments.

The contributions would be secured as part of the wider S.106 agreement for any development on the site.

Further details of this can be found online at <https://www.gravesham.gov.uk/heritage-conservation/nature-conservation/2> and <https://northkent.birdwise.org.uk/>

To assist you on biodiversity KCC Biodiversity officer has been consulted, with the full comment provided earlier in the report. However, to summarise the key points are as follows:

- A preliminary ecological appraisal / ecological impact assessment is required
- An ecological survey should dictate the layout of development to inform design and protect areas of ecological interest
- Forthcoming Biodiversity Net Gain legislation should be considered (10% gain required)
- Protection of designated sites

Sustainable Urban Drainage and Surface Water Run Off

Policy CS18 (LPCS) sets out the requirements for dealing with sustainable drainage and surface water run-off. Kent County Council (KCC) is the Lead Local Flood Authority. In addition, Southern Water and The Environment Agency would be formally consulted on any future planning application for this site.

As you have highlighted in your covering letter the site is located within flood zone 1 which means there is low probability of flooding. As highlighted by the Environment Agency on their flood mapping service

<https://flood-map-for-planning.service.gov.uk/>

You will need to do a flood risk assessment if your development is any of the following:

- bigger than 1 hectare (ha)
- in an area with critical drainage problems as notified by the Environment Agency
- identified as being at increased flood risk in future by the local authority's strategic flood risk assessment
- at risk from other sources of flooding (such as surface water or reservoirs) and its development would increase the vulnerability of its use (such as constructing an office on an undeveloped site or converting a shop to a dwelling)

If your development does not fall into any of these categories, you only need to download the flood map for planning on this page showing your flood zone to include in your planning application.

From the information provided a flood risk assessment would be required as the site is larger than 1 hectare.

You may wish to engage the pre-application services of KCC, Southern Water and the Environment Agency in order that you can address any of their potential concerns prior to submitting a formal application.

Details of the pre-application services can be found below.

- KCC - <https://www.kent.gov.uk/environment-waste-and-planning/flooding-and-drainage/sustainable-drainage-systems>
- Southern Water - <https://www.southernwater.co.uk/developing-building/planning-your-development>
- Environment Agency - <https://www.lbbd.gov.uk/sites/default/files/attachments/Planning-advice-from-the-Environment-Agency-poster.pdf>

Sustainable Development

Gravesham Borough Council recognises the importance of sustainability and on 25 June 2019 at its Full Council meeting declared a climate emergency and this includes the target to make the borough Carbon Neutral by 2030.

Any future application should seek to deliver on site renewable energy and other appropriate mitigation, you are reminded of the need for any development on site to comply with Part S Building Regulations, further details which can be found online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf

Refuse Arrangements

Policy CS19 (LPCS) requires new development to incorporate facilities for the storage and recycling of wasted generated. In order to ensure this proposal complies with Policy CS19 (LPCS) a refuse strategy should be included with any future application.

To assist you what would be required from Gravesham Waste Services I have attached Planning Guidance on Waste Collection Requirements (2022) as Appendix 1. I would also like to reiterate the comment from GBC Waste (included above in full),

- Concern that road layout does not allow for refuse vehicles to access whole site
- No detail on where bins would be stored
- Choice of road surfaces should be appropriate for 26 tonne vehicles
- Vehicle tracking plans should be provided

Contaminated Land

Policy CS19 (LPCS) and Section 11 of the NPPF (2021) requires new development to avoid adverse environmental impacts of land contamination and remediating contaminated land.

Due to the various 20th century buildings on the site and some of which you would be looking to demolish any future application would need to address any potential contaminated land issues. Whilst we can impose planning conditions any future application would need to be accompanied by a Phase 1 and 2 Geo-Environmental Assessment.

Subject to the above and the inclusion of relevant planning conditions to address any potential remediation issues there would be no conflict with local or national planning policy.

Noise

Gravesham's Environmental Protection Team (Regulatory Services) require a noise impact assessment for the impact of traffic noise on the two blocks of flats in the entrance of the development. This was addressed in the email from Debbie Wilder sent 8th September 2023.

Air Quality

Gravesham's Environmental Protection Team (Regulatory Services) do not require an air quality impact assessment for the development. This was addressed in the email from Debbie Wilder sent 8th September 2023.

Heritage and Archaeology

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. However, I would suggest you contact KCC Heritage (Casper.Johnson@kent.gov.uk) who will be able to provide you further guidance on this matter.

Summary

The general principle of the development on this site is deemed acceptable. You are advised to address the issues around loss of social infrastructure, engaging with Sports England regarding the loss of playing pitches, addressing highway and parking issues, along with the design concerns, particularly in relation to the proposed medical centre.

As outlined in this letter you will need to ensure that you provide the sufficient supporting information in order to address the comments in this response and you are strongly advised to engage with the **relevant external consultees prior to submitting this application.**

If you wish to formally establish the development is acceptable on site I would recommend an outline application is submitted for the site with all matters reserved accept access, an application for the conversion can be brought forward separately. Ensuring safe and suitable access to the site will crucial this needs to be addressed at the outline stage. **For the avoidance of doubt the application should only be submitted once you have concluded your pre-application enquiry with KCC Highways and have resolved all potential highway issues.**

Next Steps

If planning permission is sought, an application can be made through the Planning Portal, here:

<https://www.planningportal.co.uk/applications>

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at:

<https://www.gravesham.gov.uk/downloads/file/382/local-validation-list>

Prior to submitting a planning application, you may wish to engage the services of planning agent;

<https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website;

<https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application-service>

You are advised that **PRE20230203** is now closed.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.

Appendix 1 – Planning Guidance on Waste Collection