
SUMMARY REPORT

Application Ref:	20160670
Site Address:	M Block, Former Gravesend and North Kent Hospital
Application Description:	**REVISED DESCRIPTION** Outline application (with all matters other than access reserved) for the demolition of a former hospital block and erection of up to 80 residential units and flexible B1/D1/D2 ground floor unit, and associated works including construction of podium, car and cycle parking, refuse and cycle storage and landscaping.
Applicant:	Mr D Thurgar, NHS Property Services Ltd
Agent:	Mr P Allin, Boyer Planning
Ward:	Pelham
Parish:	Non-Parish Area
Decision due date:	25 th November 2016
Publicity expiry date:	25 th November 2016
Decision level:	Planning Regulatory Board - 11 January 2016
Reasons for referral:	At the request of Cllrs Jenny Wallace and Brian Sangha for the following reasons: <ul style="list-style-type: none">- major development proposal;- a preference to see a more detailed and comprehensive development proposal for the whole area;- for better consideration of the aesthetic appearance of the buildings;- a desire for a more active use of the ground floor for commercial use;- concerns relating to sufficient levels of car parking;- the need for community facilities for residents within the scheme to interact; and- a need for adequate planning for waste management.
Recommendation:	Outline Planning Permission subject to planning conditions and S.106 agreement

Summary of Reasons for Recommendation

The building known as 'M Block' has not been in use since 2006 and the NHS has declared the site surplus to operational healthcare requirements. It is being put forward for development as a residential led scheme.

The site is substantial in size and the outline application for up to 80 residential units will offer a significant contribution towards meeting the Borough's housing supply, weighing in support of the application.

The planning policy position is that the site is subject to Policy CS05 (Gravesend Town Centre Opportunity Area) in the Local Plan Core Strategy. It falls within sub area 3.2, west of the town centre and is identified as being redeveloped for residential dwellings with active uses on the ground floor in the plan period.

The scheme has been designed to take advantage of the sloping topography of the site by focusing the bulk of the development at the lowest part of the site along Clifton Road, and minimising the height of the development to the south of the site adjacent to the existing terrace on Stuart Road. Due to the application currently being in outline form, the plans submitted are indicative only. However the development is considered to safeguard neighbour amenity on the whole. To ensure neighbour amenity and site context is safeguarded, the height of the development and the number of storeys will be restricted by condition for the reserved matters stage.

Parking provision is less than one per unit at only 66 parking spaces for 80 residential units. The Council's adopted standards require a maximum of one space per unit for one bed flats and it would be desirable to ensure that this level of provision is met once the reserved matters application is submitted, and which will be conditioned.

Many of the details submitted with this application are indicative due to the outline nature of the proposal. However with the use of detailed conditions, many aspects can be safeguarded for the reserved matters application.

The development is considered to be broadly policy compliant and therefore planning permission is recommended subject to planning conditions.

MAIN REPORT

1. Site Description, Context and Surroundings

- 1.1 The site is known as M Block and was the former maternity unit of Gravesend and North Kent Hospital. There is a 5 storey rectangular building on the site which has been vacant for the last ten years and is to be demolished as part of this application.
- 1.2 The use of the site as a maternity hospital closed on 01 January 2006. Dartford, Gravesham and Swanley Clinical Commissioning Group (CCG) confirmed that the building is entirely surplus to the operational healthcare requirements of the NHS, considering that it does not have any clinical requirements for the site, specifically;
 - The CCG is working with the Oak Group/Kings Fund to review and make more effective use of the current in-patient sites
 - The current KCC strategy to ensure that patients are cared for at home where possible
 - Whilst the strategy for Primary Care still needs to be developed, the

footprint and size of M Block exceeds any anticipated need. This is further supported by the estimated cost to bring the site back to current clinical standards (approximately £8.5 million) which would be prohibitive

- The CCG must ensure that the current investment in Gravesend Community Hospital is maximised in order to deliver value for patients of Dartford, Gravesham and Swanley area, which would not be achieved by investing in the refurbishment of the site.
- 1.3 The Clinical Commissioning Group is in full support of the proposals outlined by NHS Property Services, that the site should be disposed of to prevent incurring additional costs and release the capital back into public funds. Since the use has ceased, the condition of the building and the surrounding land has deteriorated resulting in a negative impact on the townscape.
 - 1.4 The site comprises the M-Block building itself and the surrounding land. However it specifically excludes the car park to the north east of the site running alongside Bath Street. This is within the ownership of the NHS but it is subject to a Private Finance Initiative to provide 70 parking spaces which is applicable for approximately the next 20 years.
 - 1.5 The property transferred to NHS Property Services following the NHS reforms in April 2013 and the key role of this was to efficiently manage and dispose of properties which are no longer required by the NHS for the delivery of services. It has been confirmed in a letter from Dartford, Gravesham and Swanley Clinical Commissioning Group, dated 9 January 2014, that the site is surplus to requirements and therefore subject to a residential led redevelopment.
 - 1.6 The total site area is 0.39 hectares comprising the former hospital building M Block and ancillary land, which is largely overgrown. The internal floorspace of the hospital building itself is 4725m². The site slopes downwards from the southern end towards the River Thames. According to the planning statement, the southern part of the site is approximately 3 metres higher than the northern section.
 - 1.7 The site is surrounded by roads on three sides - Bath Street to the east, Stuart Road to the west, and Clifton Road to the north. The Gravesend Community Hospital borders the site to the south and was redeveloped under planning reference 20030670. There is a range of building types and form in this location which include modern flat developments along Clifton Road and a row of 9 terraced properties along Stuart Road.
 - 1.8 In policy terms, the application site falls within sub-area 3.2 of the Town Centre Opportunity Area of the Local Plan Core Strategy 2014. It is west of the town centre and is divided by Thames Way. To the north lies Imperial Retail Park and to the south west lies the Asda superstore.
 - 1.9 To the south east of Thames Way is the Wickes DIY store which sits at a higher level from it. Wickes DIY store is accessed from Stuart Road and this road also includes a number of residential properties. The large number of retail stores in this sub area means that large areas are used for associated car parking. M Block lies to the east of Stuart Road as part of the former hospital site. There is also a small area of residential properties to the south of The Overcliffe.

- 1.10 Paragraph 4.6.27 of the Local Plan Core Strategy acknowledges that it is likely that the M Block site will be redeveloped for residential use during the plan period and this should include active uses on the ground floor to help create a more pedestrian friendly route to the Imperial Retail Park.

2. Planning History

- 2010/0343** Erection of 2.4 metre high palisade security fencing around 'M Block' building including double entrance gates on the Clifton Road elevation.
Application refused 23/06/2010
- 2005/0005** Alterations to the car parking area, entrance area and generator area to that previously permitted under planning permission reference number 20030670 for the erection of a new community hospital.
Permitted 11/02/2005
- 2003/0670** Erection of a new two-four storey Community Hospital comprising outpatients, 12 rehabilitation beds, 10 intermediate care beds, community dental services, diagnostic services, minor injuries unit, closer to home teams, specialist nurses, direct access teams, Social Services day care centre, 80 Social Services beds and associated offices; formation of day care centre drop-off layby in Bath Street; erection of a religious pavilion in the central courtyard; demolition of part of the existing M Block annex to provide two level decked car parking; laying out of and alterations to the existing car parking and alterations to the existing vehicular access onto Bath Street.
Permitted 10/10/2003
- 1994/0483** Change of use of the former physiotherapy building to a day care nursery.
Application refused 10/11/1994
- 1991/0334** Section 64 Determination as to whether planning permission is required for the erection of a mobile data antenna on the roof of the M Ward Block.
Permission not required 22/05/1991
- 1990/0449** Display of 3 no. 48-sheet advertisement hoardings fronting Clifton Road and Bath Street.
Application refused 26/06/1990
- 1986/0558** Circular 18/84 consultation for the erection of a lift enclosure on the north side of the out patients department building.
Permitted 29/09/1986
- 1980/0407** Erection of external fire escape at the south east corner of the main hospital building.
Permitted 26/06/1980

- 1978/1067** Erection of three 53ft high chimneys on the south side.
Permitted 13/03/1979
- 1978/1058** Construction of a new plane room over existing operating theatre suites.
Observations sent 26/01/1979
- 1978/0421** Use of land and formation of a temporary car park.
Granted temporary permission 25/07/1978
- 1975/0310** Proposed fire escape.
Application withdrawn 06/10/1975

3. Proposal

- 3.1 This is an outline application for the demolition of the existing former hospital block and the erection of up to 80 residential units and a flexible B1/D1/D2 ground floor unit, and associated works including the construction of a podium, car and cycle parking, refuse and cycle storage and landscaping.
- 3.2 The indicative plans submitted with the application show two principal buildings on the site, one running the length of the east elevation, and the second along the west elevation. There is a smaller building between the two larger buildings fronting onto Clifton Road. The building to the east of the site is the larger of the buildings, approximately six storeys in height at the front decreasing to three storeys in height to the south of the site. This building is of a similar scale to the existing 'M Block' building on site. The second smaller building is five storeys in height, decreasing to four storeys. The building has been designed to take advantage of the steep topography of the site. The middle building is three storeys in height. Some residential units are provided with outdoor terraces and balconies on the indicative plans.
- 3.3 The three buildings are joined at ground floor level, which is the entrance to the parking area and which is partially underground. There is a podium level at first floor where the main entrance to the residential units is located. The podium is to be landscaped and is an upper ground floor level. It is intended that this will help to increase the views to the river and allow for better movement of wind and sunlight to the flats. The podium will act as a communal amenity space and suitably landscaped to create a communal garden for residents and visitors.
- 3.4 Although the proposal is for up to 80 units the submitted Design and Access Statement shows an indicative mix of 72 units that could be delivered through detailed design of 1, 2 and 3 bed units (32, 28 and 12 in total respectively), and consisting of 65 market housing units, and 7 affordable units being 4 social rented and 3 intermediate (shared ownership). An alternative mix has also been explored to achieve 76 units as in the table below.

Unit Type	Number of Units	Percentage
<i>1 Bed – 2 Person</i>	40	53%
<i>2 Bed – 3 Person</i>	31	41%
<i>3 Bed – 5 Person</i>	5	6%
TOTAL	76	100

- 3.5 Due to the application of the Vacant Building Credit, the affordable housing provision indicative of this scheme is 7 units at 61m² which is a 2 bed 3 person unit.
- 3.6 66 car parking spaces are proposed which is a provision of less than one space per unit. According to the Design and Access Statement, because of the reduced level of parking, spaces cannot be allocated as 1 space per flat and will instead be provided on a long lease to required users. The indicative car parking is made up of 53 resident spaces, 11 visitor spaces and 2 disabled visitor parking spaces.
- 3.7 90 cycle spaces are proposed.
- 3.8. To encourage sustainable travel for residents, a residential travel plan is proposed to be implemented at the development. This is to encourage travel by means other than private car. Examples include;
- Travel Vouchers for Free Cycle or Free Bus Pass based upon one per household
 - Travel Packs for Residents
- 3.9 A flexible commercial unit is proposed at ground floor level, approximately 60m². The proposed uses of the commercial unit are B1 (business), D1 (non-residential institution) or D2 (Assembly and Leisure).
- 3.10 There are two vehicular accesses proposed serving the three buildings, located in the spaces between the three buildings. One of the accesses is the existing access/crossover serving the site in Clifton Road, and a new access is proposed towards the west of the site. Each access essentially serves its own car park.
- 3.11 A Transport Assessment has been submitted for consideration with this application.
- 3.12 The site is not within a Conservation Area.
- 3.13 The application comprises the following plans and documents:
- Drawing no. 15.265/001 (Site Location Plan)
Drawing no. 15.265/002 (Site Ownership Plan)
Drawing no. 15.265/003 (Demolition Plan)
Drawing no. 15.265/004 (Indicative Site Layout)
- Drawing no. 15.265/005 (Indicative Ground Floor Plan)
Drawing no. 15.265/006 (Indicative First Floor Plan)
Drawing no. 15.265/007 (Indicate Second Floor Plan)
Drawing no. 15.265/008 (Indicative Third Floor Plan)
Drawing no. 15.265/009 (Indicative Fourth Floor Plan)
Drawing no. 15.265/010 (Indicative Fifth Floor Plan)
Drawing no. 15.265/011 (Indicative Roof Plan)
Drawing no. 15.265/012 (Indicative Site Elevations)
Drawing no. 15.265/013 (Indicative Site Sections)
- Drawing no. S15/4997/01 (Topographical Survey)

Planning Statement by Boyer (June 2016)
Design and Access Statement

Daylight and Sunlight Study by Right of Light Consulting (June 2016)
Environmental Impact Assessment by NHS Property Services (October 2015)
Habitats Survey by WYG Planning and Environment (August 2014)
Historic Environment Assessment by Howe Malcolm Archaeology & Planning Ltd (July 2014)
Site Investigation Report (February 2007)
Surface Water Drainage Report (June 2016)
Transport Assessment by Mayer Brown (June 2016)

4. Planning Policy, Development Plan and other Material Considerations

4.1 Under S38(6) of the Planning and Compulsory Purchase Act 2004, any application for planning permission stands to be determined 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.

4.2 The Development Plan for Gravesham therefore now comprises:-

- The Gravesham Local Plan Core Strategy (September 2014)
- Remaining Saved Policies of the Local Plan First Review (1994)
- Kent Minerals and Waste Local Plan (adopted July 2016) and saved policies

4.3 There are a number of other planning policy documents which are of some relevance to the consideration of planning applications and are material considerations, including national planning advice and guidance in the National Planning Policy Framework 2012 (NPPF), the National Planning Practice Guidance 2014 (NPPG), and Supplementary Planning Guidance and other Documents adopted by the Council.

4.4 There are no relevant neighbourhood plans.

Gravesham Local Plan Core Strategy (2014)

4.5 The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main areas where major change is likely to take place and allocates sites which are key to achieving the strategy.

4.6 The site lies within the West of the Town Centre Opportunity Area in the Policies Map and is situated in sub area 3.2. The most relevant policies from the adopted Core Strategy in relation to this development are as follows;

Policy CS01: Sustainable Development
Policy CS02: Scale and Distribution of Development
Policy CS05: Gravesend Town Centre Opportunity Area

Policy CS07: Economy, Employment and Skills
Policy CS08: Retail, Leisure and the Hierarchy of Centres
Policy CS10: Physical and Social Infrastructure
Policy CS11: Transport
Policy CS13: Green Space, Sport and Recreation
Policy CS14: Housing Type and Size
Policy CS15: Housing Density
Policy CS16: Affordable Housing
Policy CS18: Climate Change
Policy CS19: Development and Design Principles

- 4.7. A Site Allocations and Development Management Policies Development Plan Document will be prepared following the adoption of the Core Strategy.

Gravesham Local Plan First Review 1994

- 4.8 The Gravesham Local Plan First Review was originally adopted in November 1994 and a number of policies were saved in September 2007.
- 4.9. Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework (NPPF, paragraph 215).
- 4.10 Those Local Plan First Review policies that remain in force are listed in Appendix 1 of the Local Plan Core Strategy. The remaining saved policies will be replaced following the adoption of the Site Allocations and Development Management Policies Development Plan Document.
- 4.11 The following remaining saved policies from the Gravesham Local Plan First Review (1994) are considered to be of relevance to this application:

Policy LT6: Additional Open Space on New Housing Development
Policy T1: Impact of Development on the Highway Network
Policy T2: Channelling of Traffic onto the Primary and District Distributer Network
Policy T3: Development Not Well Related to the Primary and District Distributer Network
Policy T5: New Accesses onto Highway Network
Policy P3: Vehicle Parking Standards

National Planning Policy Guidance

The National Planning Policy Framework (NPPF)

- 4.12 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The Gravesham Local Plan Core Strategy has been found to be sound and consistent with the NPPF. The weight to be given to the saved policies in the Gravesham Local Plan First Review and the Kent Minerals and Waste Local Plans will depend on their consistency with the NPPF. Planning Practice Guidance supports and clarifies areas in the NPPF.
- 4.13 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14) which means approving development proposals

that accord with the development plan and where the development plan is absent, silent or relevant policies are out of date planning permission should be granted unless any adverse impacts would so significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate development should be restricted.

- 4.14 The NPPF includes (in paragraph 17) a set of 12 core planning principles underpinning plan making and decision taking. The core principles of relevance to this development include:
- supporting sustainable economic development to meet the housing, business and other development needs of an area;
 - securing high quality design and a good standard of amenity for existing and future occupants of land and buildings;
 - encouraging the effective use of land by reusing land that has been previously development (brownfield land);
 - promoting mixed use development
 - actively managing patterns of growth to make the fullest use of public transport, walking and cycling and focusing significant development in sustainable locations;
 - delivering sufficient community and cultural facilities and services to meet local needs
- 4.15 Numerous sections of the NPPF are directly relevant to the consideration of this development. The following paragraphs are specifically highlighted as being of importance to the consideration of the proposals, but it should not be taken that these are the only parts of the NPPF that need to be considered.
- 4.16 Paragraphs 19 – 20, Building a Strong and Competitive Economy
- Planning should support sustainable economic growth and not act as an impediment to it, proactively meeting the development needs of business.
- 4.17 Paragraphs 23 – 27, Ensuring the vitality of town centres
- Planning should allocate edge of centre sites for main town centre uses that are well connected to the town centre. Planning should apply a sequential test to planning application for main town centre uses that are no in an existing centre.
- 4.18 Paragraphs 29 – 41, Promoting Sustainable Transport
- Encouragement should be given to solutions that reduce greenhouse gas emissions and facilitate the use of sustainable modes of transport to accommodate the efficient movement of goods etc. Travel plans should also be provided to facilitate sustainable transport where developments generate significant amounts of movement.
- 4.19 Paragraphs 47 – 55, Delivering a wide choice of high quality homes
- Housing applications should be considered in the context of the presumption in favour of sustainable development (paragraph 49) and local planning authorities should plan for a mix of housing identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local

demand (paragraph 50), bringing back into residential use empty housing and buildings in line with local housing and empty homes strategies (paragraph 51).

4.20 Paragraphs 56 – 68, Requiring Good Design

Promotion of good design is key aspect of sustainable development and poor designs that fail to take opportunities available for improving the character and quality of an area and the way it functions should be refused.

4.21 Paragraphs 69 – 74, Promoting Healthy Communities

Planning plays an important role in facilitating social interaction and should plan positively for the use of shared spaces.

The National Planning Practice Guidance (NPPG)

4.22 On the 6th of March 2014 a new web-based resource for Planning Practice Guidance was launched (<http://planningguidance.planningportal.gov.uk/>). It supports and clarifies areas in the NPPF and replaces a substantial list of guidance documents published from 1978-2013.

4.23 It contains guidance on assessing housing need; design; public consultation; open space provision in new development; travel plans, transport assessments and statements in decision-taking; health and wellbeing; water supply, wastewater and water quality; light pollution; determining a planning application; the use of planning conditions and viability, amongst other things.

4.24 The NPPG gives guidance on what is a material planning consideration in determining a planning application indicating that the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations.

4.25 The NPPG includes more detailed advice on the use of planning conditions (replacing the cancelled Circular 11/95).

Supplementary Planning Guidance and other Documents

4.26 The Council has adopted a number of Supplementary Planning Guidance 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.

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

4.28 The following documents are relevant to the consideration of this development:

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Adopted Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006)
- GBC Residential Layout Guidelines (SPG2 February 1996)

- Vehicle Accesses on Classified Highways (SPG6 November 1992)
- GBC Housing Standards Policy Statement (2015)
https://www.gravesham.gov.uk/_data/assets/pdf_file/0016/201625/Housing-Standards-Policy-Statement.pdf

5. Consultations and Publicity

Consultations

Internal

5.1 GBC Engineering Services

The principle of residential development on this site is agreed. Matters for discussion include the quantity and layout of parking provided (and how it is allocated or not), management of parking on the remainder of NHS site, access and footway details in Clifton Road and potential need for changes to on-street parking restrictions.

5.2 GBC Conservation Architect

The scale of the proposal has been accepted as a result of those recently approved in adjacent sites, as well as the existing building on site. In respect of the setting of Hazards House & Former Brewery Offices, and 44 West Street, both grade II listed, the proposal offers an improvement on the existing flank elevation of the hospital building that presents itself towards the setting of the listed buildings. With the opportunity for improved boundary treatment and tree planting this will offer an improved street frontage along Clifton Road.

Materials and details will be important to secure a successful development. The Smeed Dean London Stock brick is the favoured brick for town centre proposals. Standing seam metal cladding comes in various forms and it will be important to ensure a lead/zinc finish is achieved. Presumably windows will be low profile aluminium recessed back from the face of the wall. Landscaping and boundary treatment, particularly boundary railings and piers along the back edge of the pavement combined with hedge planting and trees behind will significantly enhance the proposal.

Subject to detailed conditions I would raise no adverse comments.

5.3 GBC Leisure Manager

In respect of more formal leisure provision and due to the size of the proposed development, it is not expected that this would be included on site, but it is reasonable to expect the developer to offset the impact of its development on existing leisure facilities in the area. This was a similar situation faced with the nearby Clifton Slipways development. Based on all the assessment data available (e.g. current Gravesham PPG17 Leisure Assessment and Sport England's Sports Facility Calculator), there is a justifiable case for the applicant to provide off-site provision for a number of key leisure typologies based on the increase in population generated by the new development. The Council is currently updating the Leisure Facilities and Open Space Study, but some of the initial headlines are;

- Tired leisure facility stock at Cascades Leisure Centre and Cygnet Leisure Centre.
- Future requirements for additional sports hall and pool hall space within the area.
- Tired existing artificial sand based pitch and no existing 3G pitch facility in the area.
- Future requirements for additional mini and youth football provision.

Taking into consideration the development's location within the Borough and real time need/deficiencies on the ground, the development is expected to make a financial contribution towards upgrading and improving existing leisure provisions, which may include those broad projects listed above. Using Sport England Sports Facility Calculator (SFC) as a guide, but without knowing the final residential property numbers and average people per dwelling figures for this particular application, if we assume 231 residents (based on the figures provided on p42 of the design and access statement and taking an average uplift of the proposed mix to meet the revised 80 units recently mentioned), the SFC gives an indicative figure of approximately £104,089. This includes provision towards pool hall, sports hall and an artificial pitch (whether sand based or 3rd generation based). Please note that the calculator does not include a contribution amount towards formal grass playing pitch provision.

With regards to informal leisure provision it is noted that the design and access statement outlines some indicative plans for a focal amenity space area that should enable provision for children's play (e.g. p47 fig.76) and other facilities. This on-site provision would be the preferred option from a leisure perspective and so this has not been factored in as an off-site provisional cost at this stage.

5.4 GBC Economic Development

Economic Development would suggest that a B1 use on the ground floor could provide a wider range of employment opportunities over D1/D2 uses and that demand is fairly buoyant with the loss of much Town Centre B1 to residential uses via permitted development in recent years.

Economic Development would be happy to work with the developer if a Local Labour Training and Employment Management Plan is required for a development of this scale and nature.

Economic Development recently assisted Countryside to produce a Local Labour Training and Employment Management Plan with North Kent College for Springhead.

5.5 GBC Regulatory Services (Commercial)

No objection in principle. The following comment is made for the information of the applicant;

Health and Safety – In these premises the Health and Safety Executive will be the enforcing Authority for all health and safety matters. Should you

require further advice and information they can be contacted on 0300 0031747 or email advice@hse.gsi.gov.uk.

5.6 GBC Regulatory Services (Contaminated Land)

Based on the review of:

- Report on Site Investigation; Evans & Langford; February 2007; Ref. D7938X

This report is now almost 10 years old and as such should be updated to reflect changes in current guidelines and any changes that may have occurred on the site (i.e. fly tipping). It is unlikely the site poses such a risk that this information would be required upfront, I am therefore happy to condition it instead:

Contaminated Land

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the CLEA guidelines and CLR 11 methodology) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval. The desk study shall detail the history of the site uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved by the Local Planning Authority prior to investigations commencing on site.
- b) The site investigation, including relevant soil, soil gas, surface and groundwater sampling, shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- d) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.
- e) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the

works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.

f) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

5.6 GBC Waste Management

From reviewing the plans the bin stores appear to be in a good location for access. I would request that there is a dropped kerb adjacent to the bin stores so the collection crews can get the bins onto the road safely.

In terms of bin provision for 80 flats, there needs to be 13 refuse and 13 recycling bin. The bins are calculated on the provision provided to houses within the borough, at 180ltrs per fortnight for residual waste. The bins would need to be different colours, however, we can provide more detail nearer the time.

It is essential that the business unit has its own refuse storage area.

5.7 Housing Development Manager

Initial Comments

It is acknowledged that the Applicants are aware of the Council's Affordable Housing Policy.

It is understood that the Vacant Building Credit means that the Affordable Housing obligation for M Block is 7 units. It is unlikely that an affordable housing provider would come forward to purchase 7 units. We will therefore need to consider whether we negotiate a Commuted Sum (payment in lieu of on-site affordable housing). This is considered a deviation from policy and it is usual for approval for this to come from the Lead Member for Housing.

Second Comments

Following the comments above, Cllr Pritchard, the Lead Member for Housing, was contacted and the recently reinstated Vacant Building Credit and the impact this has on the affordable housing obligation was explained. Given that the affordable housing obligation equates to only 7 units, it is highly unlikely that an affordable housing provider would consider purchasing 7 units within a much larger scheme and as such it is suggested that a commuted sum (payment in lieu of on-site delivery) be agreed to be used by the Council for the delivery or major upgrade of

Council housing. Cllr Pritchard is happy with the principle of agreeing a commuted sum and a ball park figure of £340,925 has been calculated. It is usual for a clause to be included within the S.106 that puts the responsibility on the owner to carry out an independent valuation using up to date values prior to commencement.

A cascade should be included in the template which seeks to deliver the Affordable Housing on site in the first instance, moving onto a Commuted Sum should this not be possible.

External

5.8 Ebbsfleet Development Corporation (EDC)

The EDC have no objection to the proposed development.

As an observation, it is noted that section 4.6 of the Design and Access Statement refers to compliance with various residential standards. For information, to raise design quality, EDC are encouraging developers in the Garden City to deliver all new dwellings in line with the Nationally Described Space Standard. In turn, achieving this standard enables all new dwellings to meet the accessible standard set out in Building Regulations Part M4 (2) Category 2, which has superseded Lifetime Homes. Whilst noting that Gravesham Borough Council has its own adopted residential layout guidelines, it is relevant for the applicant to be aware that developments in the vicinity of the application site will generally be achieving a higher standard of internal accommodation.

5.9 Kent Fire and Rescue Service

Awaiting comment

5.10 Kent Highways & Transportation Services

The application has been submitted with a comprehensive Transport Assessment which is considered to be robust and accurately assesses the likely traffic impact of the proposed development.

The site is located in a very sustainable location being close to Gravesend town centre with its many facilities, schools and good opportunities for travelling elsewhere by train, bus and cycle. It is considered that in terms of traffic generation from the site (22 in the am peak and 29 in the pm peak) the proposed development impact is likely to be low and is likely to be considerably less than the previous hospital use. It is therefore concluded that, given appropriate mitigating measures to encourage sustainable means of travel, the traffic impact is not a significant issue, particularly when considered against NPPF Para. 32 which recommend that development should not be prevented on transport grounds unless the impact is considered to be severe.

There are sufficient opportunities adjacent to the site for cycling and walking to the town centre and its environs with National Cycle Route 1 running along Clifton Road fronting the site and well maintained footway routes both to the station and the town centre. Cycle/pedestrian crossing

points exist where necessary along the key routes. The new cycle hub facility currently being constructed adjacent to the station will hopefully encourage more commuters to cycle to the station.

It has been demonstrated in the Transport Assessment that both car ownership and usage are low in this vicinity with car ownership at 44% and means of travel to work (as driver) shown to be 27% with an equal number expected to travel by train. This reinforces the low traffic generation figures shown in the Transport Assessment.

The proposal to offer a voucher for a cycle or bus pass is welcomed and is considered, alongside a Travel Plan, to help reduce resident's reliance on the private car. The provision of these mitigating measures should be covered in a Section 106 Agreement and a requirement for the submission/approval of a Travel Plan should be required.

In terms of parking provision, the number of spaces proposed (53 + 2 disabled) is considered to be adequate given the location, the likely car ownership numbers and provided the spaces are unallocated to ensure maximum flexibility. The number of visitor spaces (11) is also considered adequate for this location. There are sufficient public car parks available in the area to handle any occasional overspill. It is felt that the number of spaces proposed complies with policy (SPG4) which is maximum recommended standards to be adjusted in appropriate locations such as this. Details of the parking arrangements should be covered by a Parking Management Plan which should be either Conditioned or included in a Section 106 Agreement for submission and approval. It is noted that the outline parking layout included in the TA does not appear to show sufficient space for vehicles to turn around but it is assumed that this can be corrected when a detailed application is submitted.

Similarly, means of delivery and servicing should be covered in a Condition requiring Delivery and Servicing Plan to be submitted and approved prior to construction commencing.

In terms of access, an arrangement whereby the two accesses are configured as a dropped kerb rather than a bellmouth would be preferred such that it gives priority to pedestrians over vehicles entering/emerging. Since this application includes means of access it is assumed that this amendment should be made as part of the current application rather than details or it could be added as a condition to any consent granted – it is left to you to implement as necessary.

A condition requiring the submission/approval of a Construction Management Plan prior to any construction works (including demolition) commencing on site. This should include such issues as lorry routing, turning for deliveries, operative parking, wheel washing etc.

Finally I am aware that, whilst there are no current projects or firm proposals for the routing of Fast-track into Gravesend in the vicinity of West Street/Stuart Road/Clifton Road, it is possible that the land occupied by this proposed development could impact upon possible routes. Since there are no currently approved schemes for Fast-track it is understood that no contribution can be applied to this development but it is felt that it may be possible to incorporate some sort of clause in a Section 106

agreement that would require the developer to assist in accommodating any proposal that may come forward in the future. Perhaps this could be the subject of future discussion should Members be minded to approve the application subject to a Section 106 agreement.

Please advise the applicant that they will require separate consent from KCC Highways for the construction /amendment of any vehicle crossings with the highway.

5.11 Kent Development Contributions

Request Summary			
	Per 'Applicable' flat	Per 'applicable' house	Project
Primary Education	£590.24	£2360.96	Towards Chantry Primary School expansion
Secondary Education	£589.95	£2359.80	Towards Mayfield Grammar expansion
'Applicable' excludes: 1 bed units of less than 56 sqm GIA.			
	Per Dwelling	Project	
Community Learning	£22.59	Towards Victoria Centre Adult Education Centre furniture and fittings	
Youth Service	£27.92	Towards Gravesend Street based Youth Work	
Library Bookstock	£48.02	Towards additional bookstock required to mitigate the impact of the new borrowers from this development	
Social Care	£46.55	Towards the Changing place enhancement in the Community Hub at Gravesend Adult Education Centre	
	1 Wheelchair Adaptable Home as part of any affordable homes delivery		
Broadband Condition	<p>Before development commences details shall be submitted (or as part of reserved matters) for the installation of fixed telecommunication infrastructure and High Speed Fibre Optic (minimal internal speed of 100mb) connections to multi point destinations and all buildings including residential, commercial and community. This shall provide sufficient capacity, including duct sizing to cater for all future phases of the development with sufficient flexibility to meet the needs of existing and future residents. The infrastructure shall be laid out in accordance with the approved details and at the same time as other services during the construction process.</p> <p>INFORMATIVE – The BT GPON system is currently being rolled out in Kent by BDUK. This is a laid fibre optical network offering a single optical fibre to multi point destinations i.e. fibre direct to premises.</p>		
Highways	<i>Kent Highway Services will respond separately</i>		
Please note that these figures are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, and build costs.			

5.12 KCC Public Rights of Way

It is not a Public rights of way issue as no rights of way are close to the development.

5.13 Kent Flood and Water Management

The application is supported by a Surface Water Drainage Strategy Report prepared by Mayer Brown (June 2016). The report indicates the infiltration will be utilised to the extent it is feasible otherwise that discharge from the site will occur via the existing connection to a Southern Water sewer in Clifton Road.

The Report states that "the peak discharge rate from the application site for the 1 in 100 year plus 30% climate change event will be restricted to the existing peak 1 in 30 year discharge rate".

This may not be compliant with the Non-Statutory Technical Standards for Sustainable Drainage (NsTS) by which we assess submission. S3 of the NsTS requires that for peak runoff rates should be as close as practical to the greenfield runoff rate but should not exceed the rate prior to development. This site has been derelict for 10 years. No information has been presented on the condition of the system and whether it continues to provide continual surface water contribution to the public sewer.

It is agreed that a feasible surface water strategy will be available to ensure that flood risk is appropriately managed. It is important that any discharge to a public sewer is agreed and approved by the sewerage undertaker. We would recommend that the rate of discharge from the site to the public sewer is "proven" or demonstrated, clearly calculated and confirmed with Southern Water. We would also require calculation of the greenfield runoff rate for the site and consideration of climate change impacts to any peak rates. These calculations would form the basis of determination of an appropriate discharge rate.

We would encourage inclusion of other sustainable drainage features, such as green roofs or bio retention areas to provide other additional benefits to the site but which may also address the volume of water being discharged from the site.

Notwithstanding the lack of final destination of surface water, if the Council is minded to grant the application, we would recommend inclusion of following conditions:

Conditions:

1. Development shall not begin until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the Local Planning Authority. The detailed drainage scheme shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated on-site and disposed preferentially to ground or secondly, to the receiving public sewer network at a rate to be agreed and approved in writing by the Local Planning Authority. Information shall be included which demonstrates and confirms the adequacy of any existing surface water connections to be utilised for discharge from the site.

2. No building hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details. Those details shall include:

- i) a timetable for its implementation, and
- ii) a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and to ensure on-going efficacy of the drainage.

5.14 Kent County Council Heritage Conservation

The site of the application lies within the historic centre of Gravesend and within an area of archaeological potential. Although it is probably to the west of the medieval and post medieval core of Gravesend there are indications of prehistoric and Romano-British activity in this general area, especially within the hospital site to the south. There may be remains of medieval or post medieval industrial activity.

The application is supported by a detailed Historic Environment assessment. This HE assessment presents a useful summary of historic environment issues including the extent of previous ground disturbance across the site. It is clear that there is potential for archaeological remains but the extent and depth of disturbed ground needs to be understood more clearly as part of a formal archaeological mitigation programme.

The following condition is recommended;

Condition: No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of

(i) Archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and

(ii) Following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority

Reason: To ensure that features of archaeological interest are properly examined and recorded and that due regard is had to the preservation in situ of important archaeological remains. Pursuant to Articles 35 (1) and (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority is satisfied that the requirements of this condition (including the timing of compliance) are so fundamental to the development permitted that such details must be

submitted prior to the works, other than demolition works, commencing on site. This is because, at the time of granting permission, full details were not yet available but this information is necessary to ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

5.16 Environment Agency

The Environment Agency considers that planning permission could be granted to the proposed development as submitted if the following planning conditions are included. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and the Environment Agency would object to the application.

Condition: No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - a) all previous uses
 - b) potential contaminants associated with those uses
 - c) a conceptual model of the site indicating sources, pathways and receptors
 - d) potentially unacceptable risks arising from contamination at the site.
- 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the NPPF.

The site lies over a principal aquifer and National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should

also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Condition: No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the NPPF.

The site lies over a principal aquifer and National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect the underlying groundwater from the risk of pollution and in accordance with the NPPF.

The site lies over a principal aquifer and National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Condition: No drainage system for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect the underlying groundwater from the risk of pollution and

in accordance with the NPPF.

The site lies over a principal aquifer and National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Condition: Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The site lies over a principal aquifer.

5.17 Southern Water

The results of an initial desk top study indicates that Southern Water currently cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area, contrary to paragraph 109 of the National Planning Policy Framework.

Alternatively the developer can discharge foul flow no greater than existing levels if proven to be connected and it is ensured that there is no overall increase in flows into the foul system. You will be required to provide a topographical site survey and/or a CCTV survey with the connection application showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed foul flow will be no greater than the existing contributing flows.

Should the Local Planning Authority be minded to approve the application, Southern Water would like the following condition to be attached to any permission;

Condition: Development shall not commence until a drainage strategy detailing the proposed means of foul disposal and a implementation timetable, has been submitted to and approved in writing, by the Local Planning Authority in consultation with the sewage undertaker. The developer shall be carried out in accordance with the approved scheme and timetable.

The following informative is suggested: The applicant/developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service this development. The applicant/developer should contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire, S)21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk in order to progress the infrastructure.

It is the responsibility of the developer to make suitable provision for the disposal of surface water. Part H3 of the Building Regulations prioritises the means of surface water disposal in the order;

A – Adequate soakaway or infiltration system

- B – Water course
- C – Where neither of the above if practicable sewer

Southern Water supports this stance and seeks through appropriate Planning Conditions to ensure that appropriate means of surface water disposal are proposed for each development. It is important that discharge to sewer occurs only where this is necessary and where adequate capacity exists to serve the development. When it is proposed to connect to a public sewer the prior approval of Southern Water is required.

Our initial investigations indicate that Southern Water can provide surface water disposal to service the proposed development at manhole reference TQ64745356. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

The following informative is suggested; a formal application for connection to the public sewerage system is required in order to service this development. Please contact Southern Water.

5.18 Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our advice in relation to this application is provided in the following sections;

The Wildlife and Countryside Act 1981 (as amended) The Conservation of Habitats and Species Regulations 2010 (as amended)

Designated sites – further information required

The application site has the potential to result in impacts from increased recreational pressure to the Thames Estuary and Marshes Special Protection Areas (SPA) which is European designated site (also commonly referred to as Nature 2000 sites). European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'). The site is also listed as the Thames Estuary and Marshes Wetlands of International Importance under the Ramsar Convention (Ramsar Site1) and also notified at a national level as the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI).

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have. The Conservation objectives for each European site explain how the site should be restored and/or maintained may be helpful in assessing what, if any, potential impacts a plan or project may have.

As detailed within our letter of the 6 January 2015 (our reference 137979) to members of the North Kent Environmental Planning Group, Natural England's advice, based upon the best currently available evidence, is that it is likely that a significant effect will occur on the coastal SPAs and Ramsar Sites from recreational pressure arising from new housing proposals either alone or in-

combination with other plans or projects. The best available evidence (as commissioned by the North Kent Environmental Planning Group) suggests that a likely significant effect cannot be ruled out from residential developments within six kilometres of the coastal designated sites and this application falls within that zone.

The application does not include any information on measures that will be implemented to avoid or mitigate the recreational impacts to birds associated with the designated sites. If the development was to provide effective access management measures, for example by contributing to the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy, Natural England would consider this to be mitigation, which would help the Council in undertaking its Habitats Regulations Assessment. Should such a contribution be agreed by the applicant, Natural England would advise the Council that a likely significant effect upon the aforementioned designated sites would be unlikely to result from this development.

In the absence of integral avoidance and/or mitigation measures our advice is that a likely significant effect cannot be ruled out and that an appropriate assessment would need to be undertaken in order to assess the implications of the proposal for the European sites, in view of the site conservation objectives.

The above information is also required to ensure that impacts to the Thames Estuary and Marshes SSSIs do not result from this proposal.

Natural England therefore advises the Council that further information should be sought from the applicant on the measures that are proposed to manage the recreational impacts that may result from this development to the coastal designated sites.

Protected species

We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

The applicant/agent has considered crime prevention and has mentioned crime and anti-crime and anti-crime standards in their Planning and Design and Access Statement (D&AS), however to date we have had no communication from the applicant/agent and there are issues that may need to be discussed and addressed including a formal application for BREEAM and Secured by Design (SBD) if appropriate.

It is noted that the proposed parking for the site will be underground. It is very important that appropriate crime prevention measures for parking and access control for the whole site are incorporated within the final design and i would welcome the opportunity to meet with the applicant/agent to discuss these and other CPTED issues, should the development proceed.

There is merit in pre-application meetings prior to submission of any planning application and by meeting with us and discussing issues such as Crime Impact Statements (CIS) and any formal applications for this scheme such as BREEAM, Secured by Design (SBD) and SBD National Building Approval Scheme need to be addressed and agreed.

http://www.kent.polic.uk/advice/design_for_security/design_for_security.html

The applicant's attention is drawn to the Kent Design Initiative (KDI) which will assist with Crime Prevention and Community Safety.

5.20 Highways England

No objection.

Publicity

- 5.21 525 properties in the locality were consulted on the application by direct mail and three site notices were posted on site on 22 July 2016. The expiry date for comments closed on the 12th August. Two representations have been received.

The comments outlined in these representations have been summarised below:

Objections

- Bath Street resident – The key concern from this representation is the inadequate number of car parking spaces. Building properties without parking as a way to encourage use of public transport, which is underinvested, should not be an acceptable approach. Developments should provide family accommodation with adequate parking, not high density developments with high turnover and associated social problems. The area already has high density flats with limited parking and the proposal will make this considerably worse.
- Pier Road resident – Concern about the loss of a listed building which is not the case. The resident appears to have misunderstood the application as they are concerned about the loss of the Hospital and the clinics which take place. This application only relates to the current vacant 'M Block' building and the current hospital is to remain and will be unaffected by the proposal. Loss of town centre facilities, such as cinemas, to housing developments.

In Support

No neighbour representations were received in support of the application.

Re-Consultation

Following a change on the description of the application, a re-consultation period took place on 27 October 2016 for the same locality as the initial consultation. Three more site notices were displayed on site which expired on 25th November 2016.

Two further representations were received objecting to the development, one being from an original objector, and which are summarised below;

- Concerns for business during the demolition and construction process due to noise disturbance. The noise could prevent the existing businesses from operating which is based significantly around making phone calls.
- Parking for existing premises may be compromised during the construction phase.
- Loss of the use of the site as a hospital
- Already too many flat developments in the town centre.

5.22 Design: South-East Gravesham Design Surgery (Meeting 31st August 2016)

Following the presentation of the proposal to a design surgery with Design: South East (D:SE) the following comments were provided by the design advisors in attendance;

- D:SE saw initial ideas at a design surgery on 20th January 2016 as part of the pre-application enquiry.
- We feel it is developing in broadly the right ways. The car park part of the site is a long term opportunity after 20 years, but we continue to advise taking it into consideration in deciding the position and massing decisions on this site, for example where the new building is positioned very close to the eastern edge of the site.
- The geometry on the north-east corner does not appear to take the site context on board, meaningless geometry overlaid on a plan? Could it curve?
- Question reliance on hedging only to boundaries of an urban site, as, though adding greenery is good, railings and walls are securer.
- Not convinced a retail unit in the position shown would get enough footfall to be viable and suggest it should be used for the residents, say a cycle and disabled buggy repairs and store venue, post room, deliveries for internet orders etc., concierge, play equipment hire or some other use strictly for the residents
- Note affordable policy but would key worker units for the hospital workers also be a good use for the site's NHS landlord to consider.
- More options could be used for promoting change in car use. Consider car club spaces and electrical charging point. (Have even noted a large air pump for bikes is provided on a Hackney public footpath site!).

- Overall massing makes sense, the project is going in the right direction, detailed resolution of access now needed.
- Bins, plant, cycle stores for each block need careful positioning. Avoid too much dead frontage? Secure by design.
- Podium green uses are good, residents will walk through it at night in winter months back to their entrances on each core, so materials and design of low level lighting will be the crucial detail to make it pleasant.

6. Planning Analysis and Interim Development Manager Comments

Principle of the Development

- 6.1 The application site lies within the urban area. The Local Plan Core Strategy Policy CS02 (Scale and Distribution of Development) prioritises development in the urban area as a sustainable location for development. This will be achieved by *“promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area.”*
- 6.2 The site is identified to be within Gravesend Town Centre Opportunity Area (3.2 West of the Town Centre) which is covered by Local Plan Core Strategy (LPCS) Policy CS05 of the Gravesham Local Plan Core Strategy (2014). This policy encourages residential redevelopment where a satisfactory living environment can be achieved and seeks to improve pedestrian access between the town centre and the River Thames. This policy also supports the redevelopment of under-used sites where this makes more efficient use of the sites and improves town character.
- 6.3 The supporting text to Policy CS05 of the LPCS specifically makes reference to the M Block site acknowledging that *‘it is likely that the M Block site will be redeveloped for residential use during the plan period and this should include active uses on the ground floor to help create a more pedestrian friendly route to Imperial Retail Park.’*
- 6.4 The Council welcomes the principle of redeveloping the site, which is a very prominent building within the context of the town centre and surrounding one-way system. It is classed as previously developed land and one of the core principles in the NPPF is to encourage the effective use of land that has been previously developed. The proposal offers the potential to improve the townscape with the demolition of the existing building on site and also increasing activity around a currently derelict site. This would improve the sense of natural surveillance in the area. The redevelopment would also improve pedestrian routes around the site, and would also make a sizeable contribution towards local housing supply.
- 6.5 Adopted Local Plan Core Strategy Policy CS02 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 over 6,000 new dwellings in that time. Whilst the Council is currently able to demonstrate a five year housing land supply, the proposed development would result in up to 80 residential units which would offer a sizable contribution towards meeting this local need, and as such weights in support of the application.

- 6.6 The density of the proposed development is circa 200 dwellings per hectare, which exceeds the minimum density of 40 dwellings per hectare which housing developments should seek to achieve to accord with Gravesham Local Plan Core Strategy Policy CS15.
- 6.7 Overall it is considered that the proposal would be broadly in line with the referenced policies and section 6 of the NPPF for delivering a wide choice of high quality homes and as such, would be acceptable in principle.

Design and Townscape

- 6.8 When evaluating the design of this proposal, it needs to be considered against the overarching principles of the Gravesham Local Plan Core Strategy. Policy CS02 (Scale and Distribution of Development) promotes development in the urban areas whilst Policy CS15 (Housing Density) states that site will be developed at a variety of density depending on the sites location and accessibility to public transport. Furthermore, development needs to be delivered at a density that achieves good design and does not compromise the character of the area. Policy CS19 (Development and Design Principles) provides design guidance and has principles of requiring development to conserve en enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards.
- 6.9 At a national level the NPPF provides clear guidance on design and one of the core planning principles as set out in paragraph 17 is that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants. Paragraph 56-68 of the NPPF sets out basic design principles to be applied when considering development.
- 6.10 It is important to highlight that this is an application for outline planning permission with all matters reserved with the exception of access. Therefore the plans submitted are for indicative purposes only. They show what could potentially be constructed on the site and how they will achieve the proposed number of units, but this could vary at the reserved matters stage.
- 6.11 The proposal has been designed around key design principles referenced in the design and access statement. As previously mentioned, there are two principal buildings on the site with a smaller one between them. The buildings are rectangular in shape with a north south alignment, similar to the existing M Block Building. One of the design principles is to reinforce the north south axis of the site. This is intended to reinstate the historic fabric of the town and provide a permeable development structure allowing for natural movement in terms of the sun and window. The north south alignment of the buildings should also help to avoid creating single aspect north facing flats and also prevent direct overlooking between flats. There is a row of existing terrace properties on Stuart Road and although the entrance of the west block will be on Clifton Road, the proposed building follows the building line of this terrace which reinstates Stuart Road as a residential street on the east side of the road, while creating a clear north south access down to the river.
- 6.12 The north south axis also ties in with the steep topography of the site which decreases from south to north. This has greatly influenced the massing of the building which is another of the design principles. With the north of the site being lower than the south, the massing has been focussed on Clifton Road.

The massing reflects the natural fall of the site from south to north which allows for series of steps or terraces in the built form. The tallest sections of the buildings face onto Clifton Road which is 6 storeys in height to the east of the site, and 5 storeys to the west. The height then decreases to the south of the site to two storeys adjacent 15 Stuart Road and three storeys behind. The indicative sectional plan shows the height of the closet part of the west building is actually lower in height than 15 Stuart Road. The height increases as the topography declines.

- 6.13 Due to the outline nature of the application, a concern noted by ward councillors is that of the height and massing of the proposal. It is important that the height and number of storeys is restricted to be no higher than shown on the indicative plans. This is particularly important due to the topography of the site and varying land levels. The impact of the proposed buildings on the amenity of the surrounding residential properties is assessed below. A condition will be attached to the decision restricting the height and number of storeys to ensure the site does not become overdeveloped and that the buildings are not larger than currently exists on site at the moment.
- 6.14 A unique design point of this proposal is the landscaped podium level. This has been created taking advantage of the steep topography of the site. The main entrance of the site is accessed on Clifton Road. The ground floor forms the entrance into the car park. However due to the topography of the site, the ground floor level becomes a semi-basement as it is built into the slope. A podium is created on top of the ground floor level facing onto Clifton Road. As the site extends to the south, this podium becomes the same level as the rear of the site. The podium acts as a communal amenity space which will be landscaped to create a communal garden for residents and visitors. It appears that the first floor flats which front onto the podium have a small private amenity space. It is unclear whether first floor units will have direct access onto the podium. The podium helps to reinforce the north south axis of the site with clear definition between the two main buildings. The podium should also ensure some views through to the river and minimise the built up nature of the site.
- 6.15 The Clifton Road frontage, unlike Stuart Road, is more informal with a varied building line. The elevations of The Maltings are mixed with recessed elements which minimises its impact on the street scene. This is reflected in the Clifton Road elevation. The smaller central building is set back behind the two larger buildings, with a 6 metre gap between each building. The Clifton Road elevation is the highest part of the scheme, with the buildings being either five or six storeys. It is therefore important that the Clifton Road frontage has regulation spacing to reduce the built-up nature of the site and the scale of the development.
- 6.16 The application was taken to a Design: South East design surgery for advice and they considered that the scheme is developing along the right ways. The comments have been summarised earlier in the report but it is considered that the overall massing of the site is appropriate. Improvements could be made to the north-east corner of the site as it is very close to the site boundary. The corner is prominent and would benefit from an improved design relating to the overall context of the site, perhaps a curved corner, rather than a simple right angle. As the plans are indicative, this can be resolved at the reserved matters stage.

- 6.17 The site itself is not within a conservation area although it is adjacent to some attractive heritage buildings and some listed buildings (45 West Street, the former Hazards House and Brewery Offices). The proposal will present an improvement to the setting of these listed buildings over the existing hospital building.
- 6.18 In terms of materials, these finer details will be reserved by condition. However the indicative details state that brick is the preferred primary material for the walls, being a buff brick. Metal cladding is proposed to the stair cores and balconies, blue brick on the ground floor, painted steel and glass balconies. The windows are proposed to be aluminium and will be set in deep reveals. It is recommended that the Smeed Dean London stock brick is used which is the favoured material for this town centre location, and the metal cladding should have a lead/zinc finish.

Residential Amenity

- 6.19 In considering any proposals for development, it is important to ensure that it does not cause demonstrable harm to the amenity of any existing residents or property such that it will materially harm their living conditions. It is also important to assess the quality of any residential environments that are proposed as part of the scheme. Policy CS19 of the Local Plan Core Strategy seeks to protect amenity and ensure acceptable future living conditions. This also makes reference to Supplementary Planning Guidance Note 2 Residential Layout Guidelines (1996). The NPPF also assists and seeks to ensure that developments function well, do not undermine quality of life, creating attractive and comfortable places to live, work and visit. It seeks to *'secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings'*.
- 6.20 Although the existing use of the site is as a hospital and it is within the town centre opportunity area, there are numerous residential dwellings surrounding the site. This includes a row of two storey terraced properties on Stuart Road and residential flats on Clifton Road known as The Maltings. The Maltings is three storeys in height with what appears to be accommodation in the roof space. The building in the middle of the site is the older part of the site, originally a brewery, with new residential development wrapping around it on the West Street, Stuart Road and Clifton Road frontage. It is important to ensure that the existing properties are not affected by the proposal, as well as future occupiers of the development.

Privacy Distances

- 6.21 The Residential Layout Guidelines provide information on assessing privacy distances and overshadowing. All applications for new dwellings, including flats, will be expected to comply with the Borough Council's privacy distances and guidance on overshadowing. The standards specified protect the privacy and amenity of occupiers of existing and proposed dwelling and protect against loss of light and overshadowing from obstructing buildings.
- 6.22 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. For the avoidance of doubt, habitable rooms are defined as bedrooms and living areas, but specifically exclude kitchens and bathrooms. 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. 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 meters.

- 6.23 Although the plans submitted are indicative only, it is important to establish whether a development along this design would integrate into the area without affecting the privacy of existing residents. The indicative floorplans show a minimum distance of 24 metres between the west elevation of the larger building and the rear projection of 11 and 12 Stuart Road, which increases to 28 metres to the principal rear elevation. The windows in the rear projection serving 11 and 12 Stuart Road are fitted with obscure glass suggesting they serve bathrooms. 11 and 12 Stuart Road are the closest properties within the terrace to the proposed building and it is considered that the new development complies with the privacy distances stated in the Residential Layout Guidelines. It is worth noting that the proposed building to the rear of the properties in Stuart Road is not any closer to the dwellings than the existing hospital building on site. The proposed building is in a similar location and positioning to the existing building, and will in fact only be three storeys in height which is two storeys less than the existing building. Arguably, the impact of the development on the rear of 7-15 Stuart Road is less than the existing building on site.
- 6.24 The second largest building is situated to the side of 15 Stuart Road. There is a window in the flank elevation of the property which is only 6.4 metres away from the proposed development. However after looking at some plans for the property from a 19930098 planning application, this is a secondary window to a bedroom which is also served by a window on the rear elevation. There is also a high level window on the rear outrigger part of 15 Stuart Road which serves either a kitchen or a bedroom. It is the only window serving this room and is 8.7 metres away from the new development. While this does not comply with policy, the sectional plan indicates that this part of the development is actually lower in height than 15 Stuart Road. Therefore the impact is considered to be minimal and complies with the 25 degree rule referenced in the Residential Layout Guidelines. In order to protect against overshadowing, all applications for residential development will be expected to comply with the 25 degree rule. The 25 degree rule is calculated from a section in plane perpendicular to each affected main window wall of the existing building. The 25 degree angle is taken from the centre of the lowest window, from the horizontal. If any part of the new development obstructs the 25 degree line, overshadowing and loss of light may occur. This is not the case for 15 Stuart Road.
- 6.25 It is also important that private amenity space is safeguarded for the adjoining properties in Stuart Road. No.7 to 15 Stuart Road have rear gardens between 9 and 11 metres deep. The rear gardens of 11 to 15 Stuart Road adjoin the site boundary. Although the height of the eastern block is limited to three storeys, there may be an element of loss of privacy to the garden areas of these properties. Due to this application being outline, the internal layout of the proposed flats has not been established. It is therefore recommended that the flats are internally arranged to minimise any overlooking to the properties on Stuart Road, with perhaps bathrooms and kitchens on this elevation. This would safeguard amenity of existing occupiers in compliance with Policy CS19 (Development and Design Principles) of the Local Plan Core Strategy.

- 6.26 As well as assessing the impact on the residential properties in Stuart Road, the properties on the opposite side of Clifton Road also need assessing. The Maltings is a residential flat development which is mostly three storeys in height. The application site and The Maltings are only separated by Clifton Road and arguably, it is these properties which are most likely to be affected by the proposed. It is likely that the majority of windows in The Maltings serve habitable spaces. There is a small section which serves a stairwell and there is no evidence of obscure glazed windows suggesting bathrooms. From the indicative plans provided, the minimum distance between the proposed development and The Maltings flats fronting onto Clifton Road is approximately 16.5 metres. The minimum distance recommended is 21 metres and as such it is considered that the development may affect the amenity of the properties opposite the site in terms of privacy. It is therefore recommended that at the reserved matters application, the building on the west of the site is set back further into the site to meet 21 metres as close as possible.

Daylight and Sunlight Study

- 6.27 As part of this application, a Daylight and Sunlight Study has been prepared by Right of Light Consulting on behalf of NHS Property Services. The aim of the study is to assess the impact of the development on the light receivable by the neighbouring properties at 7 to 15 Stuart Road and 50 to 58, 74 to 91 and 92 to 93 Clifton Road. The study is based on the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice' by P J Littlefair 2011. In general, the BRE tests are based on the requirements of the British Standard, BS 8206 Part 2. The standards set out in the BRE guide are intended to be used flexibly. The following statement is quoted directly from the BRE guide:

"The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly, since natural lighting is only one of many factors in site layout design."

- 6.28 In terms of daylight to windows, all main habitable room windows pass the Vertical Sky Component test with the exception of isolated windows at 15 Stuart Road and 74-91 Clifton Road. However there are considered to be mitigating factors to mention. Firstly the windows at 15 Stuart Road and 74-91 Clifton Road are already hampered by a projecting wing of the existing building. The BRE guide acknowledges that where a window has an overhang or projecting wings on one or both sides of it, a larger relative reduction in Vertical Sky Component may be unavoidable, as the building itself contributes to its poor day lighting. It is also important to note that with this particular scheme, a number of windows at the properties in Stuart Road actually have their light levels improved. For the isolated windows at 74-91 Clifton Road, the results are fairly marginal. The BRE guide is intended to be used flexibly, particularly in urban locations, and in this instance, due to the mitigation outlined, the development is considered acceptable in terms of daylight to windows.

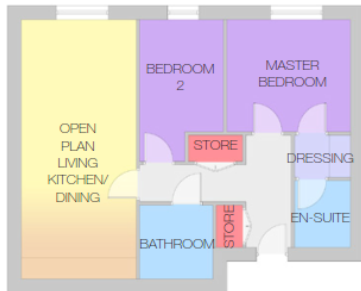
- 6.29 In terms of sunlight to windows, all windows which face within 90 degrees of due south have been tested for direct sunlight. All windows pass both the total annual sunlight hours test and the winter sunlight hours test (annual probable sunlight hours between 21 September and 21 March), and as with the daylight to windows assessment, a number of properties will actually have their light levels improved. The proposed development satisfies the BRE direct sunlight to windows requirements.
- 6.30 The results on the daylight and sunlight assessments confirm that the development will have a low impact on the light receivable by its neighbouring properties. It is the opinion of Right to Light Consulting that there is no daylight or sunlight related reason why planning permission should not be granted for this scheme.

Room Sizes

- 6.31 In respect of the consideration and assessment of housing standards as they apply to development proposals, the starting point for decision taking is the development plan. Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy 2014 requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines'. At the same time, the NPPF seeks high quality design and a good standard of amenity for all existing and future occupants of the land and buildings as one of its Core Principles. On 25 March 2015 the Government issued a written ministerial statement which introduced new technical housing standards in England and set out how these would be applied through planning policy which came into effect on 1 October 2015. From this date, existing Local Plan policies need to be interpreted with reference to the nearest equivalent national technical standard.
- 6.32 It is difficult to draw direct comparisons between existing Gravesham Residential Layout Guidelines and the National Space Standards because they are calculated on a slightly different basis. The existing Gravesham standards are based on guideline minimum spaces for each room whereas the National Space Standards related to the minimum gross internal area (GIA) for the overall unit to the design level of occupancy based on bedroom size and the potential number of bed spaces that could be accommodated.
- 6.33 The minimum floorspaces for double bedrooms and single bedrooms will no longer apply as at 11.2 sq. m and 6.5 sq. m respectively as these are less than the nationally described space standards of 11.5 sq. m and 7.5 sq. m. The minimum floorspaces for living rooms, dining rooms, kitchens, kitchen/diners, lounge/diners, bathrooms and WCs, bathrooms only, WCs only, bedsits, and hallways and landings will no longer apply as there is not an equivalent national standard.
- 6.34 The indicative plans show 72 residential units made up of forty 1 bed/2 person units, thirty-one 2 bed/3 person units and five 3 bed/5 person units. The images below show the typical layout of each flat and the floor area of each unit;



*Typical 1 Bed/2 Person Flat @ 50.5 sq.m
National Described Space Standard = 50 sq.m*



*Typical 2 Bed/3 Person Flat @ 66.4 sq.m
Nationally Described Space Standard = 61 sq.m*



*Typical 3 Bed/5 Person Flat @
88.7sq.m
Nationally Described Space
Standard = 86 sq. m*

- 6.35 It is considered from the details submitted that the unit sizes are considered adequate and comply with the residential layout guidelines and technical housing standards where applicable.

Commercial Use

- 6.36 This outline application includes a proposed commercial unit for flexible B1/ D1 and D2 uses at the ground floor of the central building. It is a modest unit approximately 60 sq. m. When the application was first submitted the flexible use also included use classes A1, A2 and A3. Retail use needs to be considered against Policy CS08 (Retail, Leisure and the Hierarchy of Centres) of the Gravesham Local Plan Core Strategy which defines the primary retail area within Gravesend town centre. As this development is outside the defined primary shopping area it has to be considered as an edge of centre location where retail development will only be permitted if there is an absence of suitable/available town centre sites. In order to support a retail use in this location, the applicant would need to justify the retail element within this scheme through the appropriate sequential test.
- 6.37 The provision of Use Classes A1, A2 and A3 within the scheme was initially proposed in response to paragraph 4.6.27 of the Local Plan Core Strategy

which states that 'it is likely that the M Block site will be redeveloped for residential use and that this should include active uses on the ground floor to help create a more pedestrian friendly route to Imperial Retail Park'. However, due to the site being outside of the town centre boundary, a sequential test is required for any retail use. This was discussed with the agent who explained that they would not be submitting a sequential test and as such have withdrawn the A1, A2 and A3 use from the commercial element, limiting it to B1, D1 and D2 which would not require a sequential test or conflict with Policy CS08. A similar approach was taken with Clifton Slipways development proposals under planning reference 20160046.

- 6.38 The use of the commercial unit needs careful consideration to ensure that an active frontage is created and it is unfortunate that a sequential test is not being provided by the applicants in support of a Class A1 retail use. The simplest way to achieve the active frontage would have been with an A1 use. While it may prove more challenging with B1, D1 and D2 uses it is not considered necessarily inappropriate. Careful consideration will be needed at the reserved matters stage to ensure this is achieved. An option, as suggested by Design: South East, may be a community use.
- 6.39 The Council's Economic Development department suggests that a B1 use on the ground floor could provide a wider range of employment opportunities over D1/D2 and that demand is fairly buoyant with the loss of much Town Centre B1 to residential uses via permitted development in recent years. Local Plan Policy CS07 (Economy, Employment and Skills) states that one of the Council's areas of focus is to ensure that sufficient provision is made of B class employment and the proposal is therefore viewed positively from an employment perspective.

Traffic and Parking Issues

- 6.40 The proposed development needs to be considered against Policy CS11 of the Local Plan Core Strategy (2014) 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. It also 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 reflected in the NPPF which states in paragraph 32 that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and development should only be prevented or refused on transport grounds where the cumulative impact of development are severe.
- 6.41 The application is accompanied by a Transport Assessment prepared by Mayer Brown in June 2016. The report has demonstrated that the site is located in a highly sustainable location, at the edge of the town centre, with a number of bus and cycle routes available, as well as the town centre, providing access to a number of key facilities. The existing statistics for the local area show that a car ownership is particularly low for the immediate vicinity of the site, as well as a low level of private car use as a method of travel work. The report demonstrates that the proposed development would generate no more than a total of 22 two way am peak trips and 29 two way pm peak trips, which is minimal, based on a conservative assessment. Based

on the sustainable location of the site, and to encourage sustainable travel from the outset, the Travel Assessment proposes a residential travel plan to be implemented at the development, involving measures to encourage travel by means other than the private car, such as;

- Travel vouchers for free cycles of free bus pass based upon one per household
- Travel packs for residents

6.42 The Travel Assessment acknowledges the following Kent County Council parking standards are applicable to the site;

No. of Units (Based on city/town centre)	Maximum Parking Provision
1 & 2 bed flats	1 space per unit
1 & 2 bed houses	1 space per unit
3 bed houses	1 space per unit

However the Kent Vehicle Parking Standards (July 2006) reference the following maximum parking standards;

No. of Units	Maximum Parking Provision
1 bedroom	1 space per dwelling
2 and 3 bedrooms	2 spaces per dwelling

The supplementary planning guidance note 4 goes on to specify that within developments of varying dwelling size, provision should be established initially on the basis on the size mix of the units proposed. There may be scope in mixed developments, particularly at higher densities, for sharing of car park spaces resulting in lower overall provision than implied by the application of the standards for each dwelling size category. More stringent standards may be acceptable to developments in town centres.

6.43 The Travel Statement considers that in context, due to the development being well located in relation to the station, town centre and railway station, the maximum parking provision is not required.

6.44 The following details outline how well-connected the site is;

- The site lies to the east of Bath Street, south of Clifton Road and west of Stuart Road. Bath Street is the A226 and forms part of the town centre gyratory, with traffic only able to travel northbound. The A2 runs south of the town centre, and provides access to the M25, M2 and M26.
- The site is adjacent to the town centre with a number of bus stops and bus services available. The nearest bus stop is Garrick Street, approximately 350m from the site.
- The site is approximately 500m from Gravesend Railway Station, serving Charing Cross, St Pancras International, Sidcup, Woolwich, Faversham, Lewisham and Gillingham, and others.
- Gravesend Station is conveniently located for cycling from the proposed – there are currently 90 cycle parking spaces at the station with a newly opened cycle hub to provide 28 spaces.

- The site is well related to existing cycle routes

6.45 Given the sustainable location of the site, its proximity to numerous public transport links and based on the findings of the Travel Assessment in terms of low car ownership, Kent County Council Highways and Transport consider the number of parking spaces to be adequate, even though it is less than 1:1. KCC Highways consider that the proposed number of spaces comply with policy (SPG4) which are the maximum recommended standards to be adjusted in appropriate locations such as this. Conditions will be required to ensure the delivery of a Parking Management Plan, along with details of vehicle turning areas in the car. It is recommended by KCC Highways that the two vehicular access points be configured as dropped kerbs rather than a bellmouth to give priority to pedestrians over vehicles entering or emerging, which can also be conditioned.

6.46 Whilst the sustainable transport solutions of the applicants are fully acknowledged and notwithstanding the support for the scheme in transport terms by KCC Highways and Transportation, at a local level, and in support of adopted policy and parking standards, GBC planning officers will seek to achieve full levels of parking wherever possible. Two ward councillors for the area, have raised concerns regarding the inadequate parking provision as currently indicated in the scheme highlighting the car parking issues in Pelham ward where on street parking is bringing huge pressures on local residents. This is heightened by the number of small housing schemes which, because of their nearness to the town centre have little or no on site car parking provision. The cumulative effects of these schemes add huge pressure for on-street parking. As referenced in paragraph 6.41, the maximum standards are 1 space per one bedroom dwelling and 2 per two or three bedroom dwelling. As a minimum, the Council would expect one to one parking spaces provision which is still below the maximum standards.

6.47 The concerns regarding the reduced level of parking have been brought to the attention of the applicant's planning agent. It was suggested that the ground floor plan is reconfigured to provide additional parking. As well as providing a car parking, commercial unit, bin stores and cycle storage, seven residential units are proposed at the ground floor level. While the residential units will help with the townscape at ground floor level, there is a concern regarding neighbour amenity with these dwellings essentially forming part of the car park. The suggestion has been made to reduce the number of units at ground floor level and replace them with additional parking. Reducing the number of units would provide the opportunity to provide additional parking spaces resulting in a more acceptable scheme. The appeal of the units at ground floor level directly adjacent to the covered car park may impact on the amenity of future residents, particularly as the ground floor becomes enclosed to the rear as it is built into the topography of the site. It is also unclear where the entrances to these seven dwellings will be and it will not be desirable for residents to access their flats via a covered car park. The space would be more appropriate as parking.

6.48 Following this recommendation being presented to the agent, the following response was received;

"As is acknowledged by KCC Highways the site is located in a highly sustainable location being very close to Gravesend town centre and thereby provides good opportunities to travel by train, bus and cycle. Evidence set

out in the supporting Transport Assessment demonstrates that car ownership in the area is low with only 44% of households owning a car. Furthermore, a travel plan would be provided as part of any detailed application which would aim to reduce reliance on the private car. On this basis, KCC Highways raised no objection and considered the proposed level of parking to be acceptable. We also note that the proposed parking ratio (0.92 spaces per dwelling) is higher than that proposed as part of the Clifton Slipways development (0.66 spaces per dwelling) which was approved by the Council's Regulatory Committee in June 2016 (ref: 2016/0046). For these reasons and combined with the fact that the application is in outline (with all matters other than access reserved) means that we consider that the proposed level of parking is appropriate. As such we do not intend to make any changes at this stage."

- 6.49 However this application is outline and it is considered acceptable for a requirement of the decision, via a planning condition, requiring that when details are submitted that one to one parking is provided. While it is appreciated that the site is in a sustainable location with lower than expected car ownership, in actuality the demand appears to be higher whereby one to one parking should be sought.

Refuse Arrangements

- 6.50 The indicative plans show two bin stores at ground floor level, serving the two principal proposed buildings on site. The bin stores measure 47m² and 50m² and are located in the car park area. GBC's Waste Management consider the bin stores to be in a good location for access and request that there is a dropped kerb adjacent to the bin stores so the collection crews can get the bins onto the road safely. Given that the application is outline, a condition will be placed on the decision for further details of the refuse arrangements to ensure their functionality. There is a concern regarding the accessibility of the bin store on collection day as the diagram on page 51 of the Design and Access Statement indicates the collection route which is across parking spaces. If these parking spaces are occupied, it is not clear how the refuse can be collected. It is likely that this layout will need to be reconfigured to ensure there is permanent access to the bins.
- 6.51 For information, the bin provision for 80 flats would be 13 refuse and 13 recycling bins. The bins are calculated on the provision provided to houses within the borough at 180litres per fortnight for residual waste.
- 6.52 Further details will need to be provided regarding the commercial refuse arrangement with the reserved matters application recognising that the business unit will need to have its own refuse storage area.

Affordable Housing Provision

- 6.53 Policy CS16 of the Gravesham Local Plan Core Strategy (2014) sets out the Council's position on affordable housing provision which is that affordable housing is required on all new housing developments of 15 dwellings or more. The amount of affordable housing to be provided by private housing development sites above the threshold is 30% in the urban area, with a mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.

- 6.54 The affordable housing contribution for this application is only 7 units (approx. 9%) which is clearly below the 30% policy requirement. This is due to the property qualifying for what is known as the Vacant Building Credit, effectively an incentive for brownfield development on sites containing vacant buildings as contained in National Planning Policy Guidance, the NPPG (Paragraph: 021 Reference ID: 23b-021-20160519). 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 referenced in Policy CS16 of the Local Plan Core Strategy. 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.
- 6.55 When the existing floorspace is taken away from the proposed floorspace of M Block, the floorspace is approx. 1366m² and the affordable housing provision is calculated at 30% of that figure. Based on a 2B/3P unit, the affordable housing contribution would equate to 7 units.
- 6.56 The NPPG provides advice that the following two points can be applied when considering when the vacant building credit can apply;
- Whether the building has been made vacant for the sole purpose of redevelopment
 - Whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development.
- 6.57 It is considered that these points are not relevant in this case and that the vacant building credit can be applied.
- 6.58 Due to the small number of affordable units to be provided, the Housing Development Manager has concerns about an affordable housing provider being willing to take on only 7 units in such a large scheme. It has therefore been suggested that a commuted sum (payment in lieu of on-site delivery) is requested which could be used by the Council for the delivery or major upgrade of Council housing. This would be secured in the Section 106 with a cascade within the template which would seek to deliver the Affordable Housing on site in the first instance, moving onto a commuted sum should this not be possible.
- 6.59 Kent County Council has requested, along with contributions toward schools, community learning, youth services and social care, that one wheelchair adaptable home is provided as part of any affordable homes delivery. It is considered that this request can be incorporated into the section 106 agreement as part of the affordable housing clause, ensuring that when the affordable housing units are delivered, at least one of the seven units is a wheelchair adaptable home.

Ecology and Biodiversity

- 6.60 The application site is located in the Thames Estuary and Marshes Ramsar Buffer Zone. The Ramsar site is of international biodiversity importance, particularly for birds. Recent evidence suggests that there has been a decline in bird populations in the internationally significant Special Protection Areas (SPA) and Ramsar sites that make up the North Kent Marshes. There is currently insufficient evidence to adequately assess the cause of this decline although interim findings indicate that recreational activity causes disturbance to birds and that more development will lead to an increase in disturbance. In the meantime, a precautionary approach to development will be applied. It will be imperative that developers address and mitigate any detrimental impacts on biodiversity.
- 6.61 In this instance, the proposed development would result in the creation of 80 additional residential properties and as such, additional recreational activity would result.
- 6.62 Therefore it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Gravesham Local Plan Core Strategy Policy CS12. In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site.
- 6.63 It is considered that the tariff can be secured via a section 106 agreement, the approved tariff being set at £223.58 per new residential unit (thus total payment in this case of £17,886.64, based on a total of 80 units being delivered on the site).
- 6.64 A link to the Council's website where there is justification for the tariff is shown below.

<http://www.gravesham.gov.uk/home/planning-and-building/nature-conservation-and-landscape/thames-estuary-and-marshes>

Any other material planning considerations

- 6.65 It is noted that financial benefits will accrue to the area if permission is granted. The Government wishes to ensure that the decision making process for planning applications is as transparent as possible, so that local communities are more aware of the financial benefits that development can bring to their area. In this instance the proposed new residential units would generate the New Homes Bonus and Council Tax receipts. However, it is anticipated that the proposed commercial unit will be exempt from Business Rates.

7. Conclusions

- 7.1 The building known as 'M Block' has not been in use since 2006 and the NHS has declared the site surplus to operational healthcare requirements.
- 7.2 The proposed redevelopment of the site for up to 80 residential units will offer a significant contribution towards meeting the Borough's housing supply, weighing in support of the application.

- 7.3 In planning policy terms the site is subject to Policy CS05 (Gravesend Town Centre Opportunity Area) in the Local Plan Core Strategy. It falls within sub area 3.2, west of the town centre and is identified as being redeveloped for residential dwellings with active uses on the ground floor in the plan period.
- 7.4 The scheme has been designed to take advantage of the sloping topography of the site by focusing the bulk of the development at the lowest part of the site along Clifton Road, and minimising the height of the development to the south of the site adjacent to the existing terrace on Stuart Road. Due to the application currently being in outline form, the plans submitted are indicative only. However the development is considered to safeguard neighbour amenity on the whole. To ensure neighbour amenity and site context is safeguarded, it is recommended that the height of the development and the number of storeys is restricted by condition.
- 7.5 Parking provision is shown in the indicative scheme at only 66 parking spaces for the proposed 80 residential units. The Council's adopted standards require a maximum of one space per unit for one bed units and it would be desirable to ensure that this full level of provision is met once the reserved matters application is submitted.
- 7.6 Many of the details submitted with this application are indicative due to the outline nature of the proposal. However with the use of detailed conditions, many aspects can be safeguarded for the reserved matters application, particularly in relation to the six key issues raised by Ward Members. These key issues have been explained in the following sections of the report;
- *A preference to see more detailed and comprehensive development proposal for the whole area* – the Private Finance Initiative is explained in paragraph 1.4.
 - *For better consideration of the aesthetic appearance of the buildings* - clarification that the application is outlined and that the finer details will be supplied at the reserved matters stage. See paragraphs 6.8 to 6.18
 - *A desire for a more active use of the ground floor for commercial use* – explanation regarding edge of centre site and requirement for sequential test for retail uses. See paragraphs 6.35 to 6.38.
 - *Concerns relating to sufficient levels of car parking* – looking to achieve maximum standards. See paragraphs 6.39 to 6.48
 - *The need for community facilities for residents within the scheme to interact* – the podium provides community amenity space (paragraph 6.14) and there may be the potential for a community facility in the commercial unit (paragraphs 6.35 – 6.38).
 - *A need for adequate planning for waste management* – further details will be secured via condition for the reserved matters application. See paragraphs 6.49 to 6.51.
- 7.7 The development is considered to be broadly policy compliant and therefore planning permission is recommended subject to planning conditions which will be set out in a supplementary report.
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Recommendation:

PERMISSION subject to planning conditions, reasons and informatives, which will be set out in a supplementary report, and to the completion of a section 106 legal agreement.