



Town & Country Planning Ltd

Former Landscape Services Depot  
Broad Lane, Wilmington,  
Dartford  
DA2 7AG

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Demolition of existing structures, erection of 9 dwellings (6 x 3 bed and 3 x 2 bed) with associated access, parking, landscaping and refuse/cycle stores

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Planning Statement

Updated July 2025

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## 1. INTRODUCTION

1.1. Willow Town and Country Planning Ltd have been instructed by Sovereign Services Kent Ltd to prepare this Planning Statement in respect of land at the former Landscape Services Depot, Broad Lane, Wilmington, DA2 7AQ, for the demolition of existing structures, erection of 9 dwellings (6 x 3 bed and 3 x 2 bed) with associated access, parking, landscaping and refuse/cycle stores.

1.2. This application is supported by the following drawings and documents:

### Drawing package by Studio Hudson:

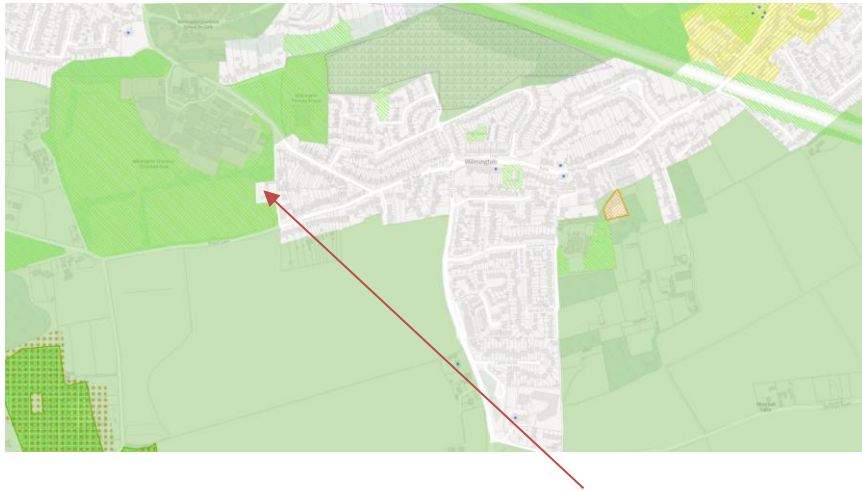
- Site Location Plan- E-100F
- Existing Site Layout- E-200E
- Existing Floor Plans- E-300
- Existing Area Assessment- E-400E
- Existing Elevations- E-800A
- Proposed Site Layout- P-200K
- Proposed House Types A & B (3 bed) - P-500E
- Proposed House Types C (2 bed)- P-501E
- Proposed House Types A- P-502
- Proposed House Types B- P-503
- Proposed Context Elevations- P-800D
- Proposed Context Elevations- P-801C
- Proposed Details- P- 850

### Supporting Studies

- Phase 1 Contamination Survey - provided by Ground and Environmental Services Ltd
- Preliminary Ecological Assessment- provided by KB Ecology
- Kent Biodiversity Net Gain Statement
- Biodiversity Net Gain Metric
- Drainage Statement provided by CTP Consulting
- Transport Statement provided by DHA
- Illustrative CGI

## 2. SITE APPRAISAL

- 2.1. The site lies northwest of the existing settlement of Wilmington, situated broadly between Broad Lane to the south and Common Lane to the north. To the west are sports playing fields associated with Wilmington Grammar School for Boys and Wilmington Academy which sits to the northwest of the site. The site is bordered largely by residential development to the east, with the Wilmington Community Church sitting to the east and south of the site. The site does not fall within the Green Belt, nor is it designated a Conservation Area or Area of Special Character. The Green Belt boundary wraps around the site to the north and west.



Local Plan Interactive Map- Site Location

- 2.2. The site occupies approximately 0.25 hectares of redundant brownfield land, having been previously used as a storage yard in connection within the County Council's landscape services. This comprises a large secure area of mainly hard standing surface with a range of redundant storage units and portacabin office/welfare facilities. The workshops are of concrete portal frame construction. Adjacent to the workshops is a canopied storage area. The units continue to be used for storing the applicant's materials and equipment.
- 2.3. The site lies northwest of Wilmington Community Church. This comprises the main Church building, which front Broad Lane, to the rear, served via a side access route are a number of incidental buildings to the Church use which offer community uses, children's church, breakout space and storage. The site is accessed from Broach Lane and is also used by the Church (through a license agreement) to access their buildings and hard standing to the rear. There is an informal church parking area to the front of the church and also to the rear.



Current site entrance to the west of Wilmington Community Church



Hard standing to the rear of the church and additional incidental community buildings.

2.4. As referenced within paragraph 3.2 of the PEA, there is a row of Leylandii along the southern boundary with multiple gaps and dead trees. The site does not benefit from any allocations within the adopted Local Plan (The Dartford Plan 2024) which does not propose any residential development specifically within Wilmington. There has therefore been minimal recent residential development within Wilmington, although planning permission has

recently been secured by Bell Dray Ltd for the demolition of the Foresters Public House and development of six dwellings (Ref: DA/19/00585/FUL) and 25 Chave Road for the erection of a three-bedroom detached dwelling and detached garage (DA/24/01077/FUL).

- 2.5. The Local Plan identifies three “priority areas” for development which are broad locations for strategic development where the majority of future development in the Borough will take place. These are: Dartford Town Centre & Northern Gateway, Ebbsfleet to Stone, and The Thames Waterfront. The focus on these areas enables greater protection for other areas where development is considered less appropriate.
- 2.6. There is a public right of way which runs parallel to the eastern boundary of the Church, the proposals include a pedestrian connection to this PROW, through Church land which is currently being undertaken via an easement agreement. This would connect the site on foot to Common Lane, which is approximately 115 metres to the north of the site which includes access to public transport, a selection of schools including a primary school, secondary academy, separate boy and girl grammar schools, and North Kent College all within close proximity. The nearest major centre is Dartford Town Centre, which is approximately 2.5 kilometers to the north east.
- 2.7. Wilmington itself is predominantly residential, dwellings run east on both sides of Broad Lane, which is characterised by ribbon development of detached and semi-detached dwellings. Where these meet Common Lane, this runs in a north westerly direction, providing further housing which wraps around the north of the site.
- 2.8. Wilmington has a village hall, two churches, scouts’ facility, village takeaway and village store. The village is also served by public transport with numerous local bus routes servicing the village.

3. PLANNING HISTORY

Reference	Proposal	Decision
72/00370/FULA1	Dem. Of Storage Building & Erection Of Office & Messroom Extn.	Permitted.
75/00637/FULA1	Replacement of Existing Granary.	Permitted.
20/01514/LDC	Application for a Lawful Development Certificate for existing use of the site as a yard for storage and maintenance of materials and equipment in association with grounds maintenance depot.	Certificate granted.
21/00058/DEMCON	Application for prior notification pursuant to Town & Country Planning (General Permitted Development) Order 2015 Schedule 2, Part 11 of proposed demolition of an open sided structure with curved roof.	Prior Approval required and granted.

#### 4. PROPOSALS

- 4.1. The proposed development includes 9 dwellings, which are all market homes. The housing mix includes 6. no 3-bedroom units (circa 95-97sqm) and 3.no 2-bedroom units (circa 71sqm).
- 4.2. The dwellings would be served from the existing access way and arranged around a central "T" shaped turning area. There are 12 allocated parking spaces, a further 3 unallocated spaces, 3 visitor spaces and a larger van space.
- 4.3. The properties are all two storey, of traditional vernacular design, under brick and weatherboard elevations with clay or slate tiled roof and solar panels. The properties are all provided with private garden areas and a substantial soft landscaping scheme is proposed to provide new tree planting, hedgerows and wider shrub planting across the development.
- 4.4. Vehicular access will be provided from the existing access road, alongside a pedestrian route through the adjacent Church land to connect with adjacent public rights of way. This is being secured through a private easement agreement between the applicant and the Wilmington Community Church (Trust).
- 4.5. The properties would be served via a private refuse vehicle/strategy to use smaller collection vehicles and offer a more frequent service. This enables the proposed dwellings to be serviced by a kerb side collection and avoid any need to bring this to Broad Lane, which would exceed recommended drag distances.

## 5. PLANNING POLICY FRAMEWORK

5.1. Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications for planning permission are required to be determined in accordance with the Development Plan in force unless material considerations indicate otherwise.

5.2. In this case, the adopted Local Plan for DBC consists of the The Dartford Plan (2024) and The Housing Windfall SPD and Borough Parking Standards SPD.

5.3. In addition to the development plan, other material considerations include the National Planning Policy Framework 20214 (NPPF).

This section summarises the relevant policy base.

### **The Dartford Plan (2024)**

5.4. The following policies are considered to be of particular relevance:

#### **SP1: Borough Spatial Strategy**

- Sustainable development will occur at planned locations in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods resilient and adaptive to climate change. Development should provide a diverse and complementary balance of uses and services within settlements and minimise the necessity to travel by private vehicles.
- Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement and expansion/ intensification of commercial locations. Economic growth will be based on a strategy of supporting the growth of existing local businesses within the Borough and encouraging start-ups and small/ medium sized enterprises.
- Economic development and jobs growth will be delivered principally through supporting development opportunities, to deliver planned strategic expansions at, or additional floor space within, the identified employment areas.
- Any residential or other development within the Borough's villages will be of proportionate scale and on non-Green Belt land.

#### **SP2: Infrastructure Planning Strategy**

- New development (including new homes) will be located where well-served by public transport, and within easy walking distance of local facilities and jobs.

- Development will be well located, and innovatively designed and constructed, to mitigate and adapt to the effects of climate change. Development in the Borough should contribute to minimising carbon emissions from properties and processes, and reducing the need for unsustainable travel, avoiding vulnerability and increasing resilience to the effects of climate change by a package of bespoke measures integrated within development at an early stage of design and planning.
- The use of sustainable and active travel modes will be embedded into developments; designing for walking/ cycling (particularly at locations which benefit the Green Grid), public transport and low carbon motorised personal transport (including for future electric vehicle charging points/ cabling needs).
- Existing green spaces, habitats, and tree coverage will be protected and enhanced, and new provision will be made, to absorb carbon dioxide, support biodiversity and reduce surface water runoff. The biodiversity mitigation hierarchy (avoid, reduce, mitigate, compensate) will apply, with the priority being to protect, enhance and integrate existing features of biodiversity interest.
- The design, location and construction of development will: minimise energy consumption; regulate internal temperatures; provide appropriate natural shading on buildings, at street level and in open spaces; incorporate renewable or low/ zero carbon energy sources; and allow for other new sustainable technologies to be provided or readily incorporated in the future.

#### **S5: Sustainable Housing Locations**

- At other locations, residential development will be supported where the benefits of the proposal outweigh the disbenefits, including the sustainability of the site's location. Unplanned windfall development within Use Class C3 involving a net gain of five or more dwellings should also show that:
  - a) It is located on brownfield land, unless it has been demonstrated that the site is necessary to rectify a lack of five year supply of deliverable housing land;
  - b) It is within easy walking distance of a range of community facilities including schools, shops, leisure and recreation services, and is well located with respect to walking/ cycling and good public transport to a choice of employment opportunities.

## **M1: Good Design for Dartford**

- Development must demonstrate that it is designed in line with the National Design Guide and the National Model Design Code, considers the principles of Kent Design, and satisfies all of the following locally specific criteria for good design in the Borough.
  - a) Responding to, reinforcing and enhancing positive aspects of the locality. Opportunities to create appropriately distinctive high quality and beautiful places should be taken, particularly using and enhancing prominent physical attributes which include the Borough's distinctive riverside environments, extensive open spaces, biodiversity assets, landscape and tree coverage;
  - b) Ensuring appropriate regard is had to heritage assets in line with policies M5 and M6 and national policy, and that the character of historic towns and villages and Areas of Special Character are respected. Development within Areas of Special Character on the Policies Map should have regard to the accompanying Appraisals;
  - c) Facilitating a sense of place with social interaction, a physical environment encouraging health and wellbeing, attractive active environments and travel options, and secure, inclusive and integrated neighbourhoods through a mix of uses and careful design and layout that ensures that commercial and public facilities are well integrated within the site and the wider locality.
  - d) Providing permeability for the site to sufficiently connect to its surrounds and for the public to traverse the site, through clear pedestrian and cycle linkages and, where appropriate, active frontages, open streets, and a fine grain mix of buildings and spaces;
  - e) Reinforcing and enhancing good design by integrating new development with the public realm/ open space, and providing biodiversity gain and natural features including rivers and lakes/ ponds; and
  - f) Meeting the requirements set out in any supplementary local design guidelines which will be produced after public consultation consistent with these principles and national requirements, to be adopted as formal Supplementary Planning Documents or Design Codes.
- Development must be shown to be suitable in terms of its height, mass, form, scale, orientation, siting, access, overlooking, overshadowing, articulation, detailing, roof form, and landscaping relative to neighbouring buildings and the wider locality. Materials must

support a sense of place and relate well to the local character.

- The appropriate scale and density of development at a site should be the outcome of securing high quality development through a design-led process and demonstrated by agreed masterplans on large sites, having proper regard to:
  - a) the current built environment context including heritage assets;
  - b) the location of the site in the Borough and its characteristics.
    - i. Assessment of development potential using locally specific design or conservation guidance documents, and fulfilling applicable Plan objectives for the area;
    - ii. Outside the urban area, design should, in particular, be sympathetic to local landscape and townscape character;
  - c) providing spacious, green and good quality developments including clearly meeting or exceeding nationally described space standards for new homes, and fulfilling policy for amenity space and green infrastructure provision; and
  - d) the principle of securing a mix of uses and residential types, achieving efficient re-use of land where appropriate, and delivering regeneration at urban locations well-served by public transport and services.

## **M2: Environmental and Amenity Protection**

- Development must demonstrate that it is designed and located to not result in unacceptable material impacts, individually or cumulatively, on neighbouring uses, the Borough's environment or public health. Particular consideration must be given to the design of proposals in order to mitigate or remove impacts in areas and subjects of potential sensitivity in the built and natural environment (including as highlighted on the Policies Map), and other potential amenity/ safety factors including:
  - a) water quality, including groundwater source protection zones;
  - b) intensity of use, including hours of operation;
  - c) anti-social behaviour and littering;
  - d) traffic, access, and parking;
  - e) noise disturbance or vibration;
  - f) odour;

- g) light pollution;
- h) overshadowing, overlooking and privacy;
- i) electrical and telecommunication interference;
- j) HSE land use consultation zones;
- k) land instability; and
- l) ground contamination and gassing.

### **M3: Sustainable Technology, Construction and Performance**

- The design, construction and whole life carbon cost of development must contribute to the mitigation of, and adaption to, climate change. This includes, but is not limited to, reducing embodied and operational carbon emissions, improving energy performance and preserving water. Applicants should demonstrate best endeavours to use recognised assessment tools/ quality standards.
- All residential development must demonstrate delivery of the water efficiency level of no more than 110 litres per person per day for all dwellings created.
- Development should aim to increase a building's length of life and its adaptability for future uses.
- Development materials should be carefully considered in order to reduce embodied carbon and reduce/ prevent waste in all development. Materials for construction should be recycled or re-used from within the site, or sourced locally, where possible.
- All development should achieve a layout and design that enables re-use, recycling and composting for the future occupiers. Convenient and suitable arrangements for the storage of refuse and recyclable materials must be made
- All residential development should incorporate passive design in order to optimise solar and daylight access and reduce the risk of overheating and the need for cooling

### **M8: Housing Mix**

- All developments should provide an appropriate mix of housing types and sizes to create vibrant and mixed communities which meet the accommodation needs of the local population. The majority of dwellings on all developments should provide two or more bedrooms.

- All new build dwellings should meet the requirement M4(2): Category 2 – Accessible and Adaptable Dwellings

### **M9: Residential Amenity Space**

- Residential development must provide sufficient and high quality amenity space to meet the health, recreation and functional needs of occupants and to contribute to good design, wellbeing and wider environmental objectives. Sites should be laid out to provide for private amenity space requirements and contribute to multi-functional green infrastructure, where possible.
- The design of all private and communal amenity types and spaces must be attractive, enable maximum functionality for the end users and be suitable to the location and character of the development. In this respect, the applicant must demonstrate how the following, as a minimum, have been taken into consideration and provided within the design:
  - a) Good sunlight and fresh air;
  - b) Leisure and recreation space;
  - c) Children’s play needs;
  - d) Storage space sufficient for the needs of likely occupiers
  - e) Relative privacy and tranquillity as appropriate to the setting
  - f) Opportunity for food growing where possible; and
  - g) Accessible and secure entrances.
- To achieve this aim, all new build residential development must provide a quantity of private amenity space that is clearly ample for each house in a development. This should be predominantly a single area, provided through an attached (preferably spacious rear) garden.

### **M10: Extensions, New Dwellings, and Garden Land**

- Development must maintain a range of dwelling sizes and sufficient garden land, retain or enhance the character, local environment and amenity of established residential areas, and achieve satisfactory quality of development.

### **M13: Green and Blue Infrastructure and Open Space Provision**

- New development will be required to contribute to the Green and Blue Infrastructure. Sites of less than 2ha will be considered on a site by site basis for a proportionate contribution. This should include multi-functional land, providing opportunities for formal and informal recreation, habitats and corridors for wildlife, native trees/ landscaping, and other measures to mitigate and adapt to the impacts of climate change. Ongoing maintenance and management of such areas will need to be demonstrated.

### **M14: Biodiversity and Landscape**

- Developments will be expected to protect and enhance biodiversity. In the event that development adversely affects any existing habitats, this must be replaced by compensatory habitat of a similar type, size and condition in close proximity to that which is being lost. The new national requirements for at least 10% biodiversity net gain will apply to all applicable developments. Local delivery of net gains should be made by enhancing existing habitats and/or creating new habitats on-site.
- All new developments should be designed and laid out in a way which is sympathetic to their landscape setting.

### **M15: Travel Management**

- Development must be appropriately located and make suitable provision to minimise and manage transport impacts which arise. Proposals must also include appropriate vehicular access arrangements to the new development, and measures for active and sustainable travel.
- Development will not be permitted where the localised residual impacts from the development on its own, or in combination with other planned developments in the area, result in severe impacts on one or more of the following:
  - a) road traffic congestion;
  - b) air quality;
  - c) safety of pedestrians, cyclists and other road users;
  - d) excessive pressure for on-street parking.
- Development will be supported where the layout and siting of all forms of access is acceptable in terms of residential amenity, highway capacity and safety, free flow of traffic,

cycle and pedestrian provision, and visual impact. Provision should be made at applicable developments for loading, unloading and the turning of service vehicles to ensure highway and pedestrian safety.

- Development must ensure that the following requirements are met:
  - a) Provision is made for safe and convenient access to footpaths and cycle routes, with public rights of way protected including, where opportunities exist, delivering new or upgraded routes between key facilities, the Green Grid network, and to existing neighbourhoods. Urban area and village footpaths/ cycleways must be safe, overlooked and well lit
  - b) Supporting facilities for cyclists, including secure cycle parking/ storage and lockers, are provided.
- Off-Street Parking: Development must provide an appropriate level and form of vehicle parking provision, taking into account any existing provision as relevant to the development, and in full accordance with the applicable Parking Standards SPD. In this respect, the following will apply:
  - a) Electric vehicle charging points must be provided for all new residential properties with dedicated/ allocated parking spaces.

### **Supplementary Planning Documents (SPDs)**

- 5.5 SPDs are prepared to further elaborate on particular policies or proposals from the Local Plan to give guidance on how they will be implemented.
- 5.6 DBC have published several SPDs, which include Borough Parking Standards, and the Housing Windfall SPD. The Housing Windfall SPD (adopted October 2014) is relevant to new homes on sites that have not been previously identified by the Council for housing.
- 5.7 For the determination of a windfall proposal the Council will consider the acceptability of the site against local policy, but it will also look at key local sustainability factors to evaluate the benefits and disbenefits of the proposal to evaluate if it is a sustainable site for housing development. The Council will also consider if there is sufficient infrastructure capacity to serve the development taking account of cumulative implications.
- 5.8 A key theme of the Core Strategy and the Windfall Housing Sites DPD is a focus on encouraging suitable residential proposals on previously developed brownfield land.

## National Planning Policy Framework (2024)

5.9. The National Planning Policy Framework (2024) came into immediate effect in December 2024. The overarching principle of the NPPF is a clear presumption in favour of sustainable development (paragraph 10 and 11).

5.10. Paragraph 11 of the NPPF defines the presumption in favour of sustainable development, which for decision making means;

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - i.) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - ii.) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

5.11. Section 5 of the NPPF sets out the Government's overarching aspirations for housing supply and places pressure on Local Authorities to boost the supply of housing. The aim of the NPPF is to support the Government's objective of significantly boosting the supply of homes (paragraph 61). Small and medium sized sites can make an important contribution to meeting the housing requirements of an area, are essential for small and medium enterprise housebuilders to deliver new homes, and are often built out relatively quickly. Local Planning Authorities should support the development of windfall sites through their policies and decisions giving great weight to the benefits of using suitable sites within existing settlements for homes (paragraph 73).

5.12. Paragraph 83 of the NPPF promotes sustainable development in rural areas. It states that housing should be located where it will enhance or maintain the vitality of rural communities. Also, that planning policies should identify opportunities for villages to grow and thrive, particularly where this will support local services and where there are groups of smaller settlements, development in one village may support services in a village nearby.

- 5.13. Paragraph 128 of the NPPF sets out that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to use employment land for homes in areas of high housing demand.
- 5.14. Section 6 of the NPPF promote sustainable transport. Paragraph 110 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 5.15. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
  - b) safe and suitable access to the site can be achieved for all users;
  - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
  - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach (paragraph 115).
- 5.15. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios (paragraph 116).
- 5.16. Within this context, applications for development should (paragraph 117):
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public

transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

5.17. Section 12 of the NPPF sets out guidance for the creation of high quality, sustainable places. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (paragraph 135).

5.18. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions

should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

5.19. To protect and enhance biodiversity and geodiversity when determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

## 6. REASONING

6.1. The principal matters at issue are:

- The principle of development
- Design and Impact Character of the Area
- Impact on Neighbouring Amenity
- Highways
- Biodiversity and Landscaping
- Other Matters

### Principle of the Development

6.2. The recently updated NPPF strongly promotes a strategy to significantly boost the supply of homes. Particularly small and medium sized sites which are often built out relatively quickly. Local Planning Authorities should support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes. There is no National or Local Policy which expressly protects the retention of existing commercial storage sites.

6.3. In addition, paragraph 125 of the NPPF identifies that substantial weight should be given to the using suitable brownfield sites within settlements unless substantial harm would be caused.

6.4. Local Plan Policies SP1 sets out that any residential or other development within the Borough's villages will be of proportionate scale and on non-Green Belt land, policy SP5 outlines that outside of the boroughs growth areas of Central Dartford, Ebbsfleet, Swanscombe and Bluewater, in other locations residential development will be supported where the benefits of the proposal outweigh the disbenefits, including the sustainability of the site's location. Unplanned windfall development within Use Class C3 involving a net gain of five or more dwellings should also show that:

- a) It is located on brownfield land, unless it has been demonstrated that the site is necessary to rectify a lack of five-year supply of deliverable housing land;
- b) It is within easy walking distance of a range of community facilities including schools, shops, leisure and recreation services, and is well located with respect to walking/cycling and good public transport to a choice of employment opportunities.

6.5. The aim of the policy is to ensure that any sites which come forward are sustainable and commensurate with sites which have been identified as part of the Council’s housing land supply. It also seeks to prevent the delivery of sites which would undermine the Council’s strategy for identified development by cumulatively overburdening future infrastructure provision. The Council’s Housing Windfall SPD was drafted prior to the adoption of the current local plan, but contains the same strong focus on encouraging suitable residential proposals on previously developed “brownfield” land.

6.6. The site comprises brownfield land within an existing settlement, which is not constrained by Local or National Policy such as being within the Green Belt. Accordingly, its redevelopment for housing should be afforded substantial weight in accordance with paragraph 125 of the NPPF.

6.7. Table 1 below sets out a comparison of the benefits vs disbenefits of the proposals as required by policy SP5:

	Benefits	Disbenefits
Use/Layout	<ul style="list-style-type: none"> <li>• Provision of 9 x 2 and 3 bedrooms units in accordance with M8- addressing the need for 2 and 3 bedroomed homes (paragraph 5.73 – Local Plan)</li> <li>• Re-development of a brownfield site</li> <li>• All units meet National Space standards and M4(2)Category 2 – Accessible and</li> </ul>	Loss of small storage facility

	<p>Adaptable Dwellings.</p> <ul style="list-style-type: none"> <li>The development would exceed the average garden size requirement of 60sqm across the development as required by Policy M9</li> </ul>	
<p>Highways</p>	<ul style="list-style-type: none"> <li>Providing a long-term solution for pedestrian and vehicular access arrangements for the site and the adjacent church. Currently the Church have no permanent right of access, (pedestrian or vehicular) over the access drive.</li> <li>Pedestrian link from the proposed site to access adjacent PROW and walking routes for schools.</li> <li>Compliant parking and refuse proposals with</li> </ul>	<p>Small increase in vehicular movements</p>

	adopted standards.	
Contamination and Drainage	<ul style="list-style-type: none"> <li>• Opportunity for appropriate remediation given previous depot use and upgrade of sites utilities, including the connected systems from the Church which at present has ongoing drainage blockages and collapse.</li> </ul>	
Biodiversity	<ul style="list-style-type: none"> <li>• Identified there is no harm to protected species, the site has been appropriately surveyed.</li> <li>• Biodiversity Net Gain is achieved on site.</li> <li>• Planting of 23 new native trees, 78 linear metres of hedgerows and new shrub planting.</li> </ul>	<ul style="list-style-type: none"> <li>• Removal of non-native leylandii</li> </ul>
Archaeology	<ul style="list-style-type: none"> <li>• Required conditions to secure appropriate written scheme of investigation to</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of non-designated heritage asset- Farm building</li> </ul>

	<p>preserve or record paleolithic remains.</p> <ul style="list-style-type: none"> <li>• Potential to consider re-use of salvaged materials within boundary detailing, e.g boundary entrance walls to the development which could be conditioned</li> </ul>	
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### Site Sustainability

- 6.8. The Local Plan sets out that for sustainable development aims to materialise, proper assessment is required of whether facilities and links are close by and convenient to use. Continuing the previous policy for windfalls of more than five dwellings, applicable walking distances in criterion 2b of Policy SP5 are those of sufficient quality and suitable in the Dartford Borough context to achieve a modal shift from car dependency, using safe and attractive routes.
- 6.9. A high but achievable level is to be maintained in the Borough for accessibility to public transport services to ensure that this offers a genuine alternative choice for residents in preference to the car. **The SHLAA uses a distance of 400m to a station or a bus stop** with at least two buses an hour each way.
- 6.10. Bus stops are present approximately 500m to the east of the site on High Road, equating to an approximate six-minute walk. Both stops are provided with a flag post and have timetable provision. The eastbound stop is also provided with shelter and seating.

SERVICE NUMBER	DIRECTION	ROUTE	FREQUENCY
4	Westbound only	New Ash Green – Stone Lodge School	School Service
414B	Westbound only	South Darenth – Dartford	School Service
477	Westbound & Eastbound	Dartford – Orpington	Mon – Sat: One per hour
510	Westbound & Eastbound	Sutton – Sevenoaks	School Service

TABLE 2-1: LOCAL BUS ROUTES (HIGH ROAD)

Table 2-1 Accompanying Transport Statement- DHA Transport

- 6.11. The bus routes provide school service routes, and an hourly bus service Monday-Saturday. Whilst this falls short of the suggested accessibility level of public transport, The NPPF is clear within paragraph 110 that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account in decision making.
- 6.12. In addition to the bus services, the site is very well connected with public rights of way as set out within Section 2 of the accompanying Transport Statement. There is a footpath connection from the site boundary running east. This connects via an existing PROW which runs north/south, parallel to the Wilmington Church boundary. This connects to Common Lane and footpath and crossing points serving Wilmington Primary School, Wilmington Academy and Wilmington Grammar School. There is also a footpath from this point along the length of Common Lane to the centre of Wilmington village.
- 6.13. In addition, Broad Lane has a speed limit of 30mph which is suitable for on street cycling. All properties have been provided with dedicated cycle storage.
- 6.14. Policy SP1 and paragraph 2.87 of the Local Plan set out that developments should be within easy walking distance of community facilities along a usable and good quality route. A maximum walking distance of up to 800m to a range of public services and shops is the normal distance that will be applied in the Borough. Table 2-3 within the accompanying Transport Statement sets out the proximity to local services, which can be achieved via existing footpath links.

FACILITY	APPROXIMATE WALKING DISTANCE	APPROXIMATE WALKING TIME
Church	50m	<1 minute
Primary School	200m	3 minutes
Boys Secondary School	250m	3 minutes
Girls Secondary School	400m	5 minutes
Day Nursery	400m	5 minutes
Off Licence	450m	6 minutes
Community Centre	450m	6 minutes
Fast Food Outlet	450m	6 minutes
Public House (The Plough)	850m	10 minutes

TABLE 2-3: FACILITIES WITHIN WALKING DISTANCE OF SITE

Table 2-3 Accompanying Transport Statement- DHA Transport

6.15. Section 2 of the accompanying Transport Statement sets out in detail the site sustainability credentials in terms of footpath link, public transport links, proximity to local amenities and community facilities.

6.16. The site is within easy walking distance of a range of community facilities including schools, shops, leisure and recreation services, and is well located with respect to walking/ cycling and public transport links.

6.17. The benefits of the proposals are:

- Redevelopment of a brownfield site
- Addressing identified need for 2/3 bedroom homes, which meet accessibility standards for accessible and adaptable homes.
- Dwellings meet national space standards and local amenity space standards.
- Provides a long-term solution of access for the site and Wilmington Church and an enhanced pedestrian link available for the local community to enhance current pedestrian accessibility.
- Remediation of existing mains drainage system which creates localised blockages for surrounding properties.
- Enhanced green infrastructure, soft landscaping, enhanced visual amenity of the

site and integration with surroundings.

- Secured Biodiversity Net Gain enhancements on site, in accordance with national mitigation hierarchy.

6.6. Any potential disbenefits are limited to a small increase in vehicle movements and loss of a non-designated heritage asset. The proposed benefits would clearly outweigh any identified disbenefits and would therefore comply with the requirements of policy SP5 in relation to focusing windfall development on brownfield land, which has access to a range of community facilities, public transport and opportunities of walking and cycling.

6.7. There should be no objection to the principle of development.

#### Loss of Employment Land

6.6. Paragraph 128 of the NPPF sets out local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to use employment land for homes in areas of high housing demand. Local Plan Policy SP1 sets out that Economic development and jobs growth will be delivered principally through supporting development opportunities, to deliver planned strategic expansions at, or additional floorspace within, the identified employment areas.

6.7. The site is not within an identified employment area and does not directly employ any people on site. Given the location of the site, within an existing settlement which would achieve the ambitions of targeting brownfield sites within settlements for homes, it is not considered there is any policy objection to its re-use and the principle of housing is acceptable.

#### Design and Impact Character of the Area

6.8. Policy M1, M2 and M8 outlines the design strategy for development within the Borough, in particular:

- Providing permeability for the site to sufficiently connect to its surrounds and for the public to traverse the site, through clear pedestrian and cycle linkages and, where appropriate, active frontages, open streets, and a fine grain mix of buildings and spaces;
- Reinforcing and enhancing good design by integrating new development with the public realm/ open space, and providing biodiversity gain and natural features.

- Development must be shown to be suitable in terms of its height, mass, form, scale, orientation, siting, access, overlooking, overshadowing, articulation, detailing, roof form, and landscaping relative to neighbouring buildings and the wider locality. Materials must support a sense of place and relate well to the local character.
- All residential development must demonstrate delivery of the water efficiency level of no more than 110 litres per person per day for all dwellings created.
- All development should achieve a layout and design that enables re-use, recycling and composting for the future occupiers. Convenient and suitable arrangements for the storage of refuse and recyclable materials must be made,
- All residential development should incorporate passive design in order to optimise solar and daylight access and reduce the risk of overheating and the need for cooling
- All developments should provide an appropriate mix of housing types and sizes to create vibrant and mixed communities which meet the accommodation needs of the local population. The majority of dwellings on all developments should provide two or more bedrooms.
- All new build dwellings should meet the requirement M4(2): Category 2 – Accessible and Adaptable Dwellings

6.9. The proposed development would create a suitable layout of properties which enhance permeability sufficiently to connect to its surrounds and enabling occupation to traverse the site, including pedestrian linkages.

6.10. The site will be provided with a comprehensive new soft landscaping scheme including native trees, hedgerows and shrubs to assist in integrating the site more effectively with the surrounding built form.

6.11. The development provides a mix of 2- and 3-bedroom properties, providing a meaningful contribution to smaller family housing stock.

6.12. Each property will be provided with cycle and refuse storage areas and a bespoke private refuse agreement to facilitate kerb side collection. The dwellings can accommodate water saving appliances to secure a water efficiency level of no more than 110 litres per person per day.

6.13. The proposed houses would exceed the minimum GIA requirements within the National Technical Housing Standards and the dwellings would meet the requirement of

M4(2)Category 2 – Accessible and Adaptable Dwellings. These thresholds are summarised below:

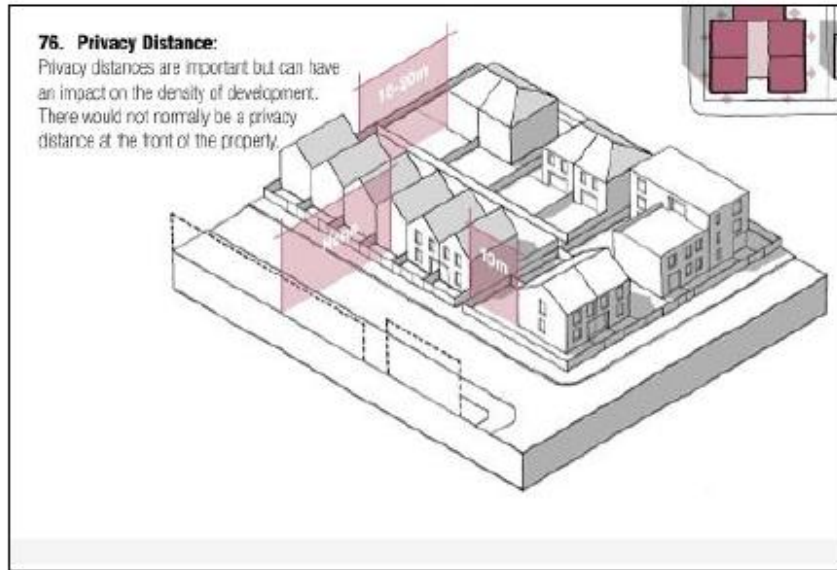
<u>House Type</u>	<u>National Space Standard</u>	<u>Proposed GIA</u>	<u>M4(2) Compliant</u>
<u>HT-A (3b35p)</u>	93sqm	97.06sqm	Yes
<u>HT-B (3b5p)</u>	93sqm	95.85sqm	Yes
<u>HT-C (2b3p)</u>	<u>70sqm</u>	71.1sqm	Yes

Table 1

6.14. The garden areas are considered acceptable for the size of dwellings proposed and the existing property and would provide adequate space for recreation and play and provides an attractive outlook for each dwelling.

6.15. The exterior of the properties follow a traditional vernacular design. The predominant local materials are brick and tiles. The proposed dwellings would reflect this with the use of clay and slate roof tiles, and a mixture of yellow stock and red multistock brickwork. All dwellings are provided with solar panels, refuse and cycle storage. The height, mass, scale and siting of the buildings is in keeping with the prevailing residential pattern of development in the vicinity and would respond to the predominantly two-storey scale of development within Wilmington.

6.16. The site layout would also comply with National Design Code Guidelines on privacy and intervisibility between plots, with a minimum of 10 m between the front/rear elevations and flank elevation of other dwellings and a minimum of 15-20m back to back with other properties.



### National Model Design Code Part 2- H.2.i – Lighting Aspect and Privacy

6.17. The proposed layout, and design of the dwellings would comply with the requirements of the above policies, further details relating to materials, finish and detailing can be controlled by condition.

#### Impact on Neighbouring Amenity

6.18. Policy M2 sets out that development must demonstrate that it is designed and located to not result in unacceptable material impacts, individually or cumulatively, on neighbouring uses, the Borough’s environment or public health. Particular consideration must be given to the design of proposals in order to mitigate or remove impacts in areas and subjects of potential sensitivity in the built and natural environment including:

- traffic, access, and parking;
- noise disturbance or vibration;
- overshadowing, overlooking and privacy;

#### 1-2 Farm Cottages

6.19. To the north of the site lie a collection of semi-detached and terraced dwellings with access from Common Lane. No.2 Farm Cottages abuts the northern boundary of the site, currently there are two single storey storage buildings against this boundary. To the front of No.1 and 2 Farm cottages is a shared off road parking area, access to Common Lane runs northward from this parking area. The proposals would see the existing buildings in this location removed and replaced with new boundary fencing and the rear garden spaces of plot 8 and

9. It is proposed that a pedestrian gate is provided to each of these plots to enable pedestrian access to the rear out onto Common Lane.

6.20. The flank wall of No.2 Farm Cottages has one side elevation opening, with the primary outlook to the east and west which would be unaffected by the proposals. The flank elevation window serves a stair well and currently overlook a small area of grass in between the existing storage building and an incidental building associated with Wilmington Community Church.



Existing flank wall of No.2 Farm Cottages and building to be demolished on the left

6.21. The outlook from this non-habitable window will be enhanced, looking over the garden areas of the proposed dwellings. Given this is a non-habitable stairwell, it is not considered this would result in any material loss of privacy to occupants of the proposed dwellings.

6.22. The proposed dwellings are set to the south west of No.2's front elevation windows, at an oblique angle, as such there would not be direct views of Plots 8/9 from No.2 Farm Cottages, any visibility would be at an oblique angle. Plots 5-7 would be set approximately 30m away, as such it is not considered these dwellings would detrimentally impact on the outlooks or privacy levels of No.1 or 2 Farm Cottages.

6.23. It is considered the overall layout, siting and arrangement of dwellings would ensure there would be no detrimental impact on the privacy, outlook, daylight, sunlight or reasonable enjoyment of No.1-2 Farm Cottages.

### Wilmington Grammar School for Boys

6.24. To the north and west of the application site lie the grounds of Wilmington Grammar School for Boys. The school buildings are a significant distance from the site, over 150m to the northwest. The site is immediately bounded by the schools playing fields. These would afford an attractive outlook from the upper floors of Units 5-7 and the proposed landscaping enhancements in the form of new tree planting will soften the relationship between the development and this open space.

6.25. Given the separation distance involved, it is not considered the current use of the school site would give rise to any unacceptable levels of noise or disturbance for potential occupants.

### Wilmington Community Church

6.26. The existing church buildings are separated from the application site by the access driveway, hard standing and a small area of grass which surrounds their breakout building to the rear.

6.27. The proposed layout is such that the access road creates separation between the two uses. Plots 8-9 have been inset by the width of two parking bays from the boundary with the Church. This is to be fenced and planted up with new trees and hedgerows to provide a green buffer between these spaces. The proposals have been developed (in conjunction with the Church) to accommodate a pedestrian route through the adjacent hard surfaced land to connect with a PROW to the east. The use of the Church buildings are primarily within the daytime and it is not considered this community use would raise any unacceptable level of noise or disturbance for potential occupants.

6.28. The orientation of the proposed dwellings ensure there is no direct overlooking between windows between the two sites and accordingly it is considered the proposed dwellings can be accommodated without detriment to the amenities and operation of the existing church use.

### Highways

6.29. The application is accompanied by a detailed Transport Assessment which sets out in all relevant highway policy and standards. This follows extensive preapplication engagement with Kent County Council as the Highways Authority. The conclusions are:

- The proposed development complies with all relevant national and local transport planning policies. The site enjoys good access to the local highway network and is

located within reasonable walking and cycling distance of a range of services, facilities and public transport nodes, providing residents and visitors with realistic opportunities for non-car travel.

- It has been demonstrated that safe and suitable access to the site can be achieved for all users, with the proposed development being accessible for pedestrians via a footpath connecting to the public right of way network, allowing for safe access to the site by pedestrians.
- The development will provide a level of visitor and unallocated car parking provision, and van, vehicle and cycle parking provision in accordance with the applicable local standards. Electric Vehicle charging infrastructure will also be provided in accordance with the Building Regulations Part S and DBC Parking Standards.
- The vehicular trip generation of the proposed development will be modest, with a total of 18 trips added to the road network across the 12-hour weekday period and will have a negligible impact on the operation of the local highway network.
- It is, therefore, concluded that the proposals will not result in 'severe' residual transport impacts, in accordance with Paragraph 115 of the NPPF, and therefore there should be no sound transport-based objections to the planning application.

### Biodiversity and Landscaping

6.30. The site is not subject to any specific landscape designation, presently much of the site is covered in hard standing with poor quality conifer trees to the south boundary.

6.31. The application is accompanied by both a Preliminary Ecological Appraisal and Biodiversity Net Gain Statement and Metric Baseline Assessment. The PEA concluded low or negligible potential to support protected species. A range of ecological enhancements can be controlled by condition.

6.32. The BNG Baseline Assessment concluded that the minimum 10% BNG enhancements can be achieved on site. This is through the planting of communal access routes, hedgerows and shrub planting in communal areas outside of residential gardens, which would also be vegetated.

6.33. This ensures the development has taken opportunities for formal and informal landscaping, and other measures to mitigate and adapt to the impacts of climate change. The delivery of net gains will be made through enhancing existing habitats and creating new habitats on-

site in accordance with Local Policies SP2, M13 and M14.

#### Other matters

6.34. The application is also accompanied by supporting Drainage and Contamination Studies, given the historical use of the site. The drainage strategy concludes there are existing public sewers on site and it is proposed to connect to these to facilitate the development.

6.35. Surface water run off is proposed to be dealt with via infiltration, it is concluded surface water run off will not lead to an increased risk of flooding or discharge rates when compared with the pre-development scenario.

6.36. Following consideration of the historical commercial use, the contamination study has recommended that confirmatory samples are collected from the soils underlying the site, as part of a Phase 2 Contamination Assessment of the site. Such an investigation could be required by an appropriate planning condition attached to any planning permission.

#### CIL

6.37. The application is CIL liable and is accompanied by the relevant forms.

## 7. CONCLUSION

- 7.1. The site falls within the village confines of Wilmington and would be of a proportionate scale, within walking distance of village amenities, nearby schools, shops and public transport links. The site constitutes previously developed land on brownfield land. This would accord with the objectives of Policy SP1 and SP5 in assessing windfall sites.
- 7.2. The site provides a sustainable location for new housing, within settlements which should be afforded substantial weight (para 125 NPPF).
- 7.3. The proposals would be suitable in terms of height, mass, form, scale, orientation, siting, access, overlooking, overshadowing, articulation, detailing, roof form, and landscaping relative to neighbouring buildings and the wider locality. The proposed materials are sympathetic and in keeping with the prevailing material palette of the village and relate well to the local character in accordance with Policy M1
- 7.4. The proposals would meet technical housing standards and provide an appropriate mix of housing types. The dwellings would provide a good standard of amenity for future occupants and would not result in material harm to neighbouring amenities, in accordance with policy M2.
- 7.5. The proposal has taken opportunities for formal and informal landscaping, and other measures to mitigate and adapt to the impacts of climate change. The delivery of net gains will be made through enhancing existing habitats and creating new habitats on-site in accordance with Local Policies SP2, M13 and M14 and would achieve the required BNG enhancements of 10% on-site.
- 7.6. The presumption in favour of sustainable development outlined at paragraph 11 of the NPPF is engaged, where the proposals accord with an up-to-date development plan they should be approved without delay.