

GRAVESHAM BOROUGH COUNCIL

PRE-APPLICATION RESPONSE

Pre-App Ref: PRE20200175

Site Address: Land rear of Turner House Whitehill Road Gravesend DA12 5PJ

Proposal: Residential development of part of former Whitehill Primary School detached playing field to provide 14 no. two and three and four bedroom, two storey houses with vehicular access from between Porchfield Close and Turner House Whitehill Road Gravesend

Applicant: Kent County Council Infrastructure Division (Mrs Rebecca Spore)

Agent: Matthew Blythin, David Hicken Associates

Valid: 01 May 2020

Ward: Whitehill Ward and adjoining Central Ward

Parish: Non-Parish Area

Site Inspection: 28 February 2020 (*Date of photos below*)

Meeting: Virtual Zoom Meeting - 24 June 2020

The Site and Surroundings

The Whitehill School open space/playing field comprises an area of 0.9 hectares of land at the rear of Turner House and Porchfield Close in Whitehill Road and is currently accessed from Whitehill Road via a gated track between Turner House and Porchfield Close. The access has a vehicular crossover the full width of the fenced and gated opening. It is surrounded and enclosed by the rear gardens of residential dwellings in Hollybush Road, Arnold Road and Lamorna Avenue.

Photo below of access, fencing and gates to Whitehill Road



Photo below of grassed access route to site between Turner House and Porchfield Close



The property is currently owned by Kent County Council (KCC) and is not open to the public. The site appears to be minimally maintained but currently not fit for use as playing fields.

The land has last been used a school playing field for Whitehill Primary School but has not been used as such apparently for some 25 years having been declared surplus to the school's need due to management, logistic, safety and accessibility issues. Prior to that, the land was part of an orchard.

There were apparently previously 2 junior sized football pitches (60x45 yards and 70x50 yards) on the school playing fields but there were no changing or any facilities or parking on the site (although the original permission allowed for the provision of changing facilities).

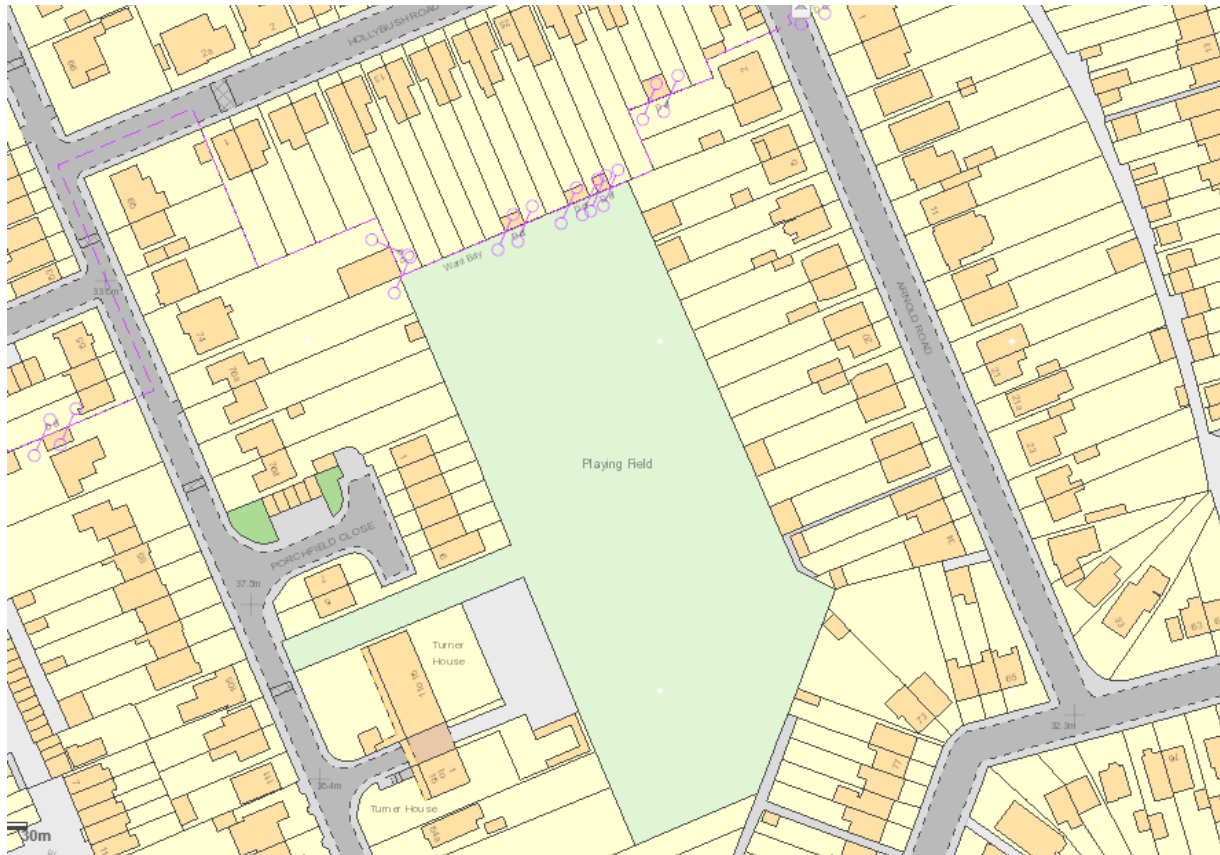
Turner House is a 4 storey flat roofed building comprising 18 flats managed by Gravesend Churches Housing Association (GCHA). Porchfield Close comprises principally 3 storey townhouses while the houses surrounding the site in Whitehill Road, Lamorna Avenue, Arnold Road and Hollybush Road are mainly 2 storey 1930's style dwellings.

Photo below of current state of the playing field



Whitehill Road is a local distributor route and a classified highway (C4), and a schedule 2 road.

The site is shown in the OS extract below.



Planning History

GBC ref 20050940

The most relevant previous planning application is 20050940.

This planning application was submitted in 2005 by Town & Country Housing Group (TCHG) and was recommended by officers for approval but was withdrawn by TCHG in 2006 prior to the determination at the Council's Regulatory Board meeting (Planning Committee) on 15th February 2006.

That application was a larger site (1.0 hectares) as it incorporated land at the rear of Turner House and was for the erection of 28 dwellings comprising two detached one bedroom bungalows, 26 two storey dwellings comprising 12 two and three bedroom semi-detached houses, a terrace of three 2 bedroom houses, a terrace of three 4 bedroom houses and two buildings to provide eight one bedroom self-contained flats and laying out associated car parking spaces. The scheme was for fully affordable housing.

The development was shown to be accessed from Whitehill Road by a new 4.8m wide road access between Porchfield Close and Turner House.

The proposals also involved re-arrangement of the Turner House car parking area. The revised car park would provide 12 spaces immediately at the rear of Turner House and with an additional 8 spaces accessed off the internal access road serving the new development. Currently the car park provides 18 spaces (one per flat) and 5 visitor spaces. The proposals also involved the removal of a block of 18 brick built external storage sheds for the Turner House residents. A drying area adjacent to the sheds was to be re-sited nearer to the building.

The scheme included the provision of an open space area of 0.1 hectare within the centre of the site surrounded by the internal access road and the open space was to be available for public use.

The application indicated that money from the sale of the land would be re-invested in the existing school.

The submitted layout is shown below:



The officer report stated:

A project group of the applicants, GCHA and the Council officers was set up to consider the potential of the site for development. In initial proposals the prospect of a GP surgery was considered in addition to housing as a replacement for the existing Lamorna Surgery in Thomas Drive but this was subsequently dropped. Sheltered accommodation had also been considered but was later changed to general needs flats.

The scheme had also looked at the prospect of vehicular access being by a one-way system exiting on to Whitehill Road underneath Turner House but this was also subsequently discounted for safety reasons and difficulty of access for emergency vehicles. The proposals had included a perimeter alleyway at the rear of the proposed houses adjoining the rear gardens of dwellings in Arnold Road, Hollybush Road and Lamorna Avenue as it had been thought that there were some properties with acquired access rights onto the playing field but investigations subsequently showed these did not exist and it was therefore possible to delete rear access.

An exhibition of the proposals was held in August 2005 and some changes were made to the scheme to take into account local residents concerns. A consultation questionnaire at that time indicated 8 local residents in support of the proposals and 10 local residents opposed to the development.

Sport England who were consulted on the application did not raise an objection to the loss of the playing field but they did make it clear that support was conditional on the receipt from the sale of the playing field being used to provide sports facilities at the school and that those new facilities at the school were available for community use and with provision of changing facilities.

There was substantial local opposition to the application with 100 objections and in addition a petition signed by 54 residents but with 5 local residents not raising an objection but had made comments or expressed some concerns on the proposals.

The officer report concluded:

It is considered that in planning terms there are some areas of concern with this submission notably that the applicants have not fully demonstrated the need to release this Greenfield site in advance of previously developed land elsewhere and have not properly justified the loss of the open space in accordance with the requirements of the planning guidance.

However it may be unrealistic to believe that the open space can be retained in its present form or that investment would come forward to preserve and maintain it in the future. On balance therefore the advantages of the provision of affordable housing and that much of it is for family type housing, the provision of an element of public open space becoming available within the scheme itself and of reinvestment in the existing school are all factors that outweigh the loss of the playing field in principle and it is considered that the weight should lay in favour of permission.

The application was recommended by officers for permission subject to conditions and subject to the application being referred to what was then the Office of the Deputy Prime Minister as a departure from the planning policies in the approved development plan and in accordance with The Town and Country Planning (Playing Fields) (England) Direction 1998.

However the application was withdrawn from consideration by the Board (Planning Committee) because of the withdrawal of supported borrowing to KCC by the DfES such that KCC were unable to commit to the new building project at Whitehill Primary School, at least for the time being, even if the sale of the detached playing field was to have gone ahead.

Other Planning History

TH/2/55/18: Conversion of 76 Whitehill Road into 4 flats and erection of 6 semi-detached houses at the rear. Permission refused on 28 February 1956 on grounds that the land was

partly in an area reserved for educational purposes and the layout of the houses was unsatisfactory.

TH/2/58/57: Erection of a Boy Scout headquarters. Permission granted 23 June 1958

TH/2/61/265: Outline application for residential development on land rear of 76 a-d and 78 Whitehill Road. Refused on 26 October 1961 on grounds that the site was shown in the development plan for educational purposes (*Note: The access was shown to be through land now part of Porchfield Close*)

TH/2/66/17: Outline application for residential development. This was a proposal for 46 houses on the current application site and also for development on the frontage of Whitehill Road between 78 and 84 Whitehill Road (*Note: Now the site of Turner House*). This was refused on 28 April 1966 on grounds that the proposal was contrary to the development plan which included the site within an area reserved for primary school purposes.

TH/2/67/48: Outline application for the change of use land to playing fields including the erection of changing rooms and w.c. accommodation on land rear of 76 A to 82 Whitehill Road. Permission granted by Kent County Council on 16 June 1967

TH/2/67/48A: Use of land as an extension to the playing fields at the rear of 84 and 84A Whitehill Road. Permission was granted by Kent County Council on 28 October 1968.

TH/2/67/48B: Detailed plans of means of access to school playing fields between 78 Whitehill Road and Turner House. Approved 10 March 1970

TH/2/67/48C: Erection of 9ft high chain link fence along the northern boundary of the site and laying out of playing fields. Approved 21 July 1970

(Note: The survey drawing submitted with the above fencing application indicated that there was some imported fill on a part of the playing field nearest to the access to the site)

Pre-Application Enquiries

PRE20150590: Residential development for 14 units (DHA on behalf of KCC). Response sent 21.12.2015

PRE20190470: Residential development of former Whitehill Primary School detached playing field to provide 34 no. two and three bedroom, two storey houses with vehicular access from between Porchfield Close and Turner House Whitehill Road Gravesend (Ubique on behalf of Stonechart). Response sent 16 March 2020

The formal written response concluded:

In principle whilst there is no objection to the development of the site for residential purposes per se there is a fundamental issue relating to the loss of playing fields and the potentially overriding objection from Sport England and further work ought to be undertaken prior to the submission of any future planning application in relation to the whether the site is actually surplus to needs, whether there is any prospect of the site being used in the further for open space including potential marketing of it, and how the loss of open space and playing pitches can be properly mitigated and re-invested locally to provide an equivalent benefit elsewhere.

Proposal

This pre-application proposal is for residential development of part of the former Whitehill Primary School detached playing field to provide 14 no. two, three and four bedroom, two storey houses with vehicular access from between Porchfield Close and Turner House Whitehill Road Gravesend.

Submitted Plans/Documents

Explanatory Letter from David Hicken Associates (DHA) dated 18 March 2020 (ref: MB/14263);

DHA Planning Design Feasibility Document March 2020 (DHA 14263) including:

- Photographs
- Drawing No DHA/14263/01: Site Location Plan;
- Drawing No DHA/14263/02: Existing Site Layout Plan;
- Drawing No DHA/14263/03: Illustrative Proposed Site Layout Plan;

DHA Transport Technical Note March 2020 (ref 14263)

The extract below shows the proposed site layout as shown in the Planning Design Feasibility Document



Details of the Development

The intention is to submit a planning application for residential development of part of the site, on an area of 0.52 hectares, (the northern half) for 14 two storey houses comprising:

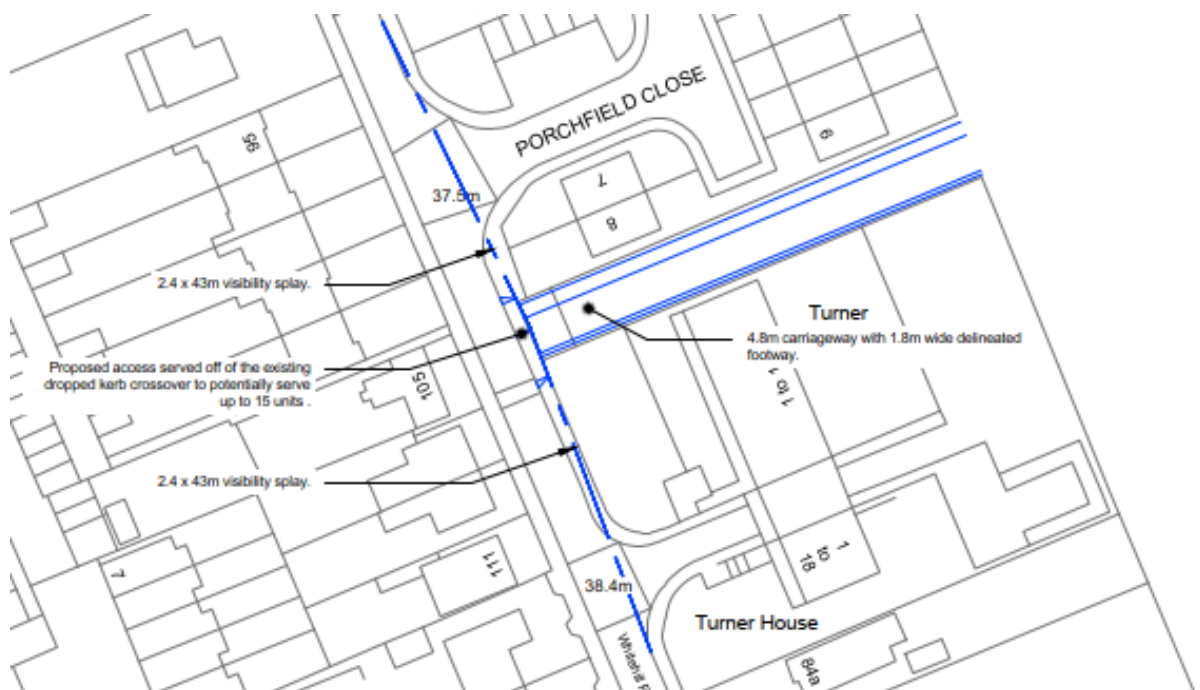
- 4 x 2 bed houses (circa 70m²)
- 8 x 3 bed houses (circa 85m²)
- 2 x 4 bed houses (circa 120m²)

The site area of the development is 0.52 hectares (this area was confirmed at the virtual conference meeting) whilst retaining the southern half as an undeveloped field.

No affordable housing would be provided as it is the applicant's opinion that the development is under the development plan threshold of a minimum of 15 units. It was suggested by the applicants at the pre-application virtual conference meeting (28 February 2020) that a greater number of units would be necessary (circa 18-20) for affordable housing to be a viable proposition on this site.

The development would be accessed from Whitehill Road by a new vehicular and pedestrian access between Porchfield Close and Turner House that might be adopted by KCC Highways. The access road would measure 4.8 metres in width with a 1.8 metre wide delineated footway provided on one side. In addition, a turning area would be provided within the development to facilitate the movement of refuse, fire and pantechnicon vehicles.

It is indicated that vehicle visibility splays of 43m in both directions along Whitehill Road would be provided from a 2.0 metre set back with a visibility height of 1 metre.



It was indicated by the applicants that the KCC Highways advice was that there could be up to a maximum of 15 dwellings units off the access as proposed.

The pre-application enquiry requests that that the Council confirm the reports and information that will be required in support of any future planning application.

Development Plan and other related Planning Policies and Guidance

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

The Development Plan for Gravesham currently comprises:

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

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 (NPPF), the National Planning Practice Guidance (NPPG), and supplementary planning guidance and where they exist neighbourhood plans. There are currently no relevant neighbourhood plans.

Previous decisions on planning applications and appeals relating to the site and relevant case law etc. are also capable of being material considerations.

In addition, the Council has recently published a Regulation 18 (stage 1) consultation on its proposed Site Allocations and Development Management Policies DPD, which will in due course form part of and update the Gravesham local plan. Under paragraph 48 of the revised NPPF 2018, policies in this document may be accorded weight in the decision making process with this varying according to its stage of preparation; the extent to which there are unresolved objections; and the degree of consistency of policy with those in the Framework. As the Site Allocations and Development Management Policies DPD is at a very early stage and the fact that the consultation is still on-going, the policies therein should at this stage be given very limited weight. It should be noted, in any event, that many of the relevant policies reflect those set out in the Framework and for the purposes of this application these should be relied on instead.

Local Planning Guidance

Gravesham Local Plan Core Strategy, September 2014

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.

The application site is shown as being within the urban area, and fronting on to a local distributor in the Gravesham Local Plan Policies Map.

The following development plan policies in the Gravesham Local Plan Core Strategy are of relevance and will be taken into account should you submit a planning application:

Core Strategy Policy CS01: Sustainable Development

Core Strategy Policy CS02: Scale and Distribution of Development

Core Strategy Policy CS11: Transport
Core Strategy Policy CS12: Green Infrastructure
Core Strategy Policy CS13: Green Space, Sport and Recreation
Core Strategy Policy CS14: Housing Type and Size
Core Strategy Policy CS15: Housing Density
Core Strategy Policy CS18: Climate Change
Core Strategy Policy CS19: Development and Design Principles
Core Strategy Policy CS20: Heritage and the Historic Environment

Policy CS01 (Sustainable Development) embeds the presumption in favour of sustainable development contained in paragraph 14 of the NPPF in the Local Plan.

Policy CS02 (Scale and Distribution of Development) makes a commitment to meeting the Borough's objectively assessed need for 6,170 new dwellings over the plan period and outlines where new development will take place. The strategy prioritises development in the urban area by promoting regeneration by:

- the redevelopment and recycling of underused, derelict and previously developed land;
- revitalising Gravesend Town Centre as a focal centre for small scale office development; and
- bringing forward a range of suitable sites for residential and employment development.

Policy CS11 (Transport) sets out that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking in new development will be provided in accordance with adopted parking standards reflecting the availability of alternative means of transport and accessibility to services and facilities.

Policy CS12 (Green Infrastructure) indicates that all green spaces contribute to the green infrastructure network and that the multifunctional network of green spaces will be created, protected, enhanced and maintained.

Policy CS13: Green Space, Sport and Recreation indicates that the Council will seek to make adequate provision for and protect and enhance the quantity, quality and accessibility of green space in accordance with an adequate up to date and relevant evidence base.

Policy CS14 (Housing Type and Size) expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Policy CS15: (Housing Density) states that sites will be delivered at a variety of densities, depending on their location and accessibility to public transport. It states that all new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration, within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare.

Policy CS18 (Climate Change) seeks to ensure that Water Framework Directive objectives are secured and that the impact of development on waste water drainage systems is minimised. Surface water run-off from all new development should, as a minimum, have no greater adverse impact than the existing use. It requires the use of Sustainable Drainage Systems where technically and financially feasible. It requires the water efficiency measures

to be installed to achieve the equivalent of level 3/4 of the Code for Sustainable Homes (105 litres per person per day)¹

Policy CS19 (Development and Design Principles) sets out detailed criteria against which the acceptability or otherwise of proposed development will be evaluated. In particular it requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design, layout and form of new development will be derived from a robust analysis of local context and character and make a positive contribution to the street scene and to the character of the area.

It requires account to be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings and of the wider context including features of townscape and landscape value, which contribute to local character and sense of place.

It requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and avoid adverse environmental impacts from pollution. New residential development is required to accord with the adopted Residential Layout Guidelines and will be required to provide appropriate levels of private and public amenity space.

Proposals should include details of appropriate hard and soft landscaping, protect and where opportunities arise enhance biodiversity and provide appropriate facilities for the storage and disposal of waste.

Policy CS20 (Heritage and the Historic Environment) gives a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk. When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Gravesham Local Plan First Review 1994

The Gravesham Local Plan First Review was originally adopted in November 1994.

A substantial number of policies of the Gravesham Local Plan First Review were saved by a Direction dated 25 September 2007 of the Secretary of State under paragraph 1 (3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 as transitional arrangements pending adoption of the Core Strategy.

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.

¹ Now equivalent to 110 litres per person per day as required by National Standard – see GBC Housing Standards Policy Statement (2015) at http://www.gravesham.gov.uk/__data/assets/pdf_file/0016/201625/Housing-Standards-Policy-Statement.pdf

The following remaining saved policies are relevant to the consideration of this proposal:

Policy T1: Impact of Development on the Highway Network

Policy T5: New Accesses onto Highway Network

Policy P3: Vehicle Parking Standards

Policy LT6: Additional Open Space in New Housing Development

Saved Policy T1 requires that all proposed developments are adequately served by the highway network identified on the Proposals Map.

Saved Policy T5 requires that the formation of new accesses or the intensification of use of existing accesses to the roads forming the highway network shown on the Proposals Map, will not normally be permitted, except where no danger would arise and where a properly formed access can be created in a location and to a standard acceptable to the Local Planning and Highway Authorities.

Saved Policy P3 requires development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.

Saved Policy LT6 requires new housing development to make provision for open space and play space, having regard to the proximity of the development to open space in the vicinity.

National Planning Policy Guidance

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) June 2019 is a material consideration.

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which means approving development proposals that accord with the development plan without delay and where there are no relevant development plan policies or where the policies are out of date planning permission should be granted unless policies of the Framework provide a clear reason for refusing the development or any adverse impacts would so significantly and demonstrably outweigh the benefits or specific policies in the NPPF taken as a whole.

The NPPF includes (in paragraph 8) three overarching objectives to achieving sustainable development:

- An economic objective;
- A social objective; and
- An environmental objective.

The following paragraphs are specifically highlighted as being of importance to the consideration of the development proposals, but it should not be taken that these are the only parts of the NPPF that need to be considered.

Section 2, Paragraphs 7 - 14: Achieving sustainable development

Section 4, Paragraphs 38 - 58: Decision Making

Section 5, Paragraphs 59 - 79: Delivering a sufficient supply of homes

Section 8, Paragraphs 91 - 101: Promoting healthy and safe communities

Section 9, Paragraphs 102-111: Promoting Sustainable Transport

Section 11, Paragraphs 117 - 123: Making effective use of land

Section 12, Paragraphs 124 - 132: Achieving well-designed places

Section 14, Paragraphs 148 - 169: Meeting the Challenge of Climate Change, Flooding and Coastal Change

Section 15, Paragraphs 170 - 183: Conserving and Enhancing the Natural Environment

Section 16, Paragraphs 184 - 202: Conserving and Enhancing the Historic Environment

Section 4, Paragraphs 38 - 58: Decision Making

Paragraph 47 indicates that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

Paragraphs 54-57 of the NPPF contain advice on planning conditions and obligations. Paragraph 55 indicates that conditions should be kept to a minimum and only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

Section 5, Paragraphs 59 - 79: Delivering a sufficient supply of homes

Paragraph 59 indicates that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Paragraph 68 (c) requires local planning authorities to support the development of windfall sites.

Section 8, Paragraphs 91 - 101: Promoting healthy and safe communities

Paragraph 91 indicates that planning decisions should aim to achieve healthy, inclusive and safe places which:

- (a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- (b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
- (c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

In respect of Open Space and Recreation paragraph 96 indicates that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Paragraph 97 states that:

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

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

Section 9, Paragraphs 102-111: Promoting Sustainable Transport

Paragraph 108 indicates that in assessing specific applications for development, it should be ensured that:

- (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- (b) safe and suitable access to the site can be achieved for all users; and
- (c) 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.

Paragraph 109 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 110, requires applications to be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Section 11, Paragraphs 117 - 123: Making effective use of land

Paragraph 117 indicates that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 118d requires decisions to promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained.

Paragraph 120 requires decisions to reflect changes in the demand for land.

Section 12, Paragraphs 124 - 132: Achieving well-designed places

Paragraph 124 advises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 127 indicates that, amongst other things, planning policies and decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change

Section 14, Paragraphs 148 - 169: Meeting the Challenge of Climate Change, Flooding and Coastal Change

This sets out (amongst other things) national policy in relation to flood risk. This should be read in conjunction with the relevant sections of National Planning Practice Guidance (NPPG 2014) and the Environment Agency Flood Risk Standing Advice available on line via <https://www.gov.uk/flood-risk-standing-advice-frsa-for-local-planning-authorities>

Section 15, Paragraphs 170 - 183: Conserving and Enhancing the Natural Environment

Paragraph 170 of the NPPF indicates that planning decisions should contribute to and enhance the natural and local environment by, amongst other things:

- (a) protecting and enhancing valued landscapes,
- (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

Section 16, Paragraphs 184 - 202: Conserving and Enhancing the Historic Environment

Paragraph 189 of the NPPF indicates that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

The National Planning Practice Guidance (NPPG)

Planning Practice Guidance (<http://planningguidance.planningportal.gov.uk/>) supports and clarifies areas in the NPPF.

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.

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.

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

Supplementary Planning Guidance and other Documents

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.

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

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

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006)
- Vehicle Accesses on Classified Highways (SPG6 November 1992)
- GBC Residential Layout Guidelines, SPG2, February 1996;
- Housing Standards Policy Statement, 1st October, 2015;
- Technical Housing Standards: Nationally Described Space Standards;

Other Relevant Council Documents

Also of relevance are the published Gravesham Open Space, Sport & Recreation Assessment, Strategy & Action Plan which has two components being the technical based assessments and the Strategy/Standards.

Of particular relevance are:

- Knight, Kavanagh & Page GBC Playing Pitch Strategy Assessment Report, June 2016
- Knight, Kavanagh & Page GBC Playing Pitch Strategy and Action Plan, August 2016

The above documents provide strategic evidence on what open space, sports and recreational provision is needed within Gravesham and will be used to inform the development of planning policies, including the need for supplementary planning documents. This is carried out in order to inform future planning application decisions and future corporate/strategic development opportunities as and when they arise.

Consultation Responses

Internal

GBC Planning Policy

Introduction

The site comprises the former Whitehill School playing field lying to the rear of Turner House in Whitehill Road, Gravesend. It is 0.91 hectares in area, relatively flat and roughly rectangular in shape and is located in a suburban area to the southeast of Gravesend Town Centre. It was used as a school playing field from the late 1960s until the mid-1990s and has remained unused since then. The site is bounded on all sides by residential development of varying ages, with a mix of two and three stories in terrace, semi-detached, detached and flatted forms.

The proposal is for the development of 14 residential units with associated access, parking and landscaping on the northern part of the site, whilst the southern end of the site would remain undeveloped and would be retained by the KCC.

The Development Plan and other relevant planning policies

Under Section 38 (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 other 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.

The development plan documents relevant to the consideration of this proposal are the Gravesham Local Plan Core Strategy, 2014 and those policies in the Gravesham Local Plan First Review, 1994, which remain saved. Policies in the National Planning Policy Framework are material considerations. The following development plan policies will be taken into account.

Appraisal

The Council's policy with regard to open space is set out in Core Strategy policies CS12 and CS13. Policy CS12 seeks to create, protect, enhance and maintain a multi-functional network of open spaces, otherwise known as the Green Grid. The site can be regarded as part of that green grid.

Policy CS13, seeks to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities.

The NPPF considers that access to high quality open space is important to the health and well-being of communities and seeks to guard against the unnecessary loss of valued facilities (Paragraphs 92 and 96). It states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements.

Policies CS12 and CS13, taken together with paragraph 97 of the NPPF provide a strong basis for the retention of the site for open space and it will be for the applicant to show whether development for housing would be more appropriate in the light of other policies in the Core Strategy and the material considerations in the NPPF, which have to be taken into account in the decision making process.

In 2016, the Council engaged consultants to carry out a comprehensive study of the Borough's open space. In its recommendations, the Study stated that it is important for all open space to be protected as a starting point. The Study identified the site as amenity open space, given that it had not been used as a playing field for over 20 years, and concluded that it enhanced the appearance of the residential area. It assessed the site as having high quality and high value and as such, it considered it as a key form of open space which it was important for the Council to maintain if possible.

A decision on this proposal will turn on the provisions in paragraph 97 of the NPPF. This states as follows.

- Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
 - a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) The loss resulting from the proposed development would be replaced by equivalent or better provision in forms of quantity and quality in a suitable location; or
 - c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

No evidence has been submitted which demonstrates that a thorough assessment has been carried out to show that the land is surplus to requirements, nor that any efforts have been made to market the site as open space or otherwise arrangements have been attempted to secure an alternative user.

No evidence has been submitted to demonstrate that any loss of open space would be replaced in terms of quantity and quality, nor has it been demonstrated that the undeveloped part of the site would be accessible or otherwise useable as open space and hence would be an integrated part of any planning application.

Notwithstanding the protection afforded to open space in both the Core Strategy and the NPPF, such protection needs to be balanced against policies which support housing development. Given that the site is not allocated for development in the Local Plan, its development for housing would be classed as a windfall and as such, would be supported by paragraph 68 of the NPPF. It would also meet the requirements of policy CS02 in that it lies within the urban area and would represent the recycling of underused land. Paragraph 117 of the NPPF requires decisions to promote an effective use of land in meeting the need for homes. In this case, the proposed development would contribute to meeting housing need.

Development would be in conformity with paragraphs 118 and 137 of the NPPF, insofar as it would be making use of underutilised land which would help to meet identified needs for housing where land supply is constrained and would reduce pressure for the release of Green Belt land. Evidence of land scarcity can be found in paragraph 2.14 of the Site Allocations: Issues and Options consultation document, which identifies a shortfall in the supply of housing sites of 2,000 dwellings. Furthermore, the site is underutilised in relation to open space, sporting and recreational use as it is not accessible to the public

Given that the site is in the ownership of Kent County Council and the decision whether to grant planning permission lies with Gravesham Borough Council, the requirement of paragraph 119 of the NPPF for local planning authorities to be proactive in bringing forward land in public ownership for development would be fulfilled if planning permission were to be granted.

Paragraph 120 of the NPPF requires decisions to reflect changes in the demand for land. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use in a plan, they should, in the interim, prior to updating the plan, support applications for alternative uses where the proposed use would contribute to meeting an unmet need for development in the area. Although the site is not allocated for open space in the Core Strategy, its use as such is protected. If it is considered that there is no prospect of an application coming forward for any open space, sports or recreational uses on the site an argument could be put forward for applying the provisions of paragraph 120.

Were the site to be developed for housing, affordable housing would need to be provided in accordance with policy CS16. Although the proposal falls beneath the 15 dwelling threshold for affordable housing provision, the policy also applies to sites of 0.5 hectares in the urban area. The site, being 0.9 hectares in area therefore exceeds the threshold.

Paragraph 63 of the NPPF, states that affordable housing should not be sought for residential developments that are not major developments. The applicant considers that this rules out the requirement in policy CS16 due to the number of dwellings proposed. However, the NPPF defines major development for housing as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. Given that the date of the NPPF supersedes that of the Core Strategy the requirement for affordable housing provision still holds good.

In addition to the replacement of open space required under the terms of Paragraph 97 of the NPPF, in the event that the site were to be developed for housing, saved policy LT6 of the Local Plan First Review, 1994, requires the provision to be made of open space specifically to meet the needs of the occupants of the dwellings. Paragraph 10.20 of the Plan explains that the policy requires the incorporation of open space for informal recreation, including equipped children's play space. As a guide, it recommends that provision should be in accordance with the National Playing Fields 6 acre standard (since replaced by the Fields in Trust Standards).

It is noted from previous planning records that there was some filled material imported onto the site and it would therefore be appropriate that this is investigated as part of any planning submission. This would enable the Council to determine whether the requirements of Paragraphs 170 and 178 of the NPPF, to prevent new development from being adversely affected by unacceptable levels of soil pollution/contamination were being met.

If the site is developed for housing, the following additional requirements will need to be addressed:

- In accordance with policy CS11, sufficient parking will be provided in accordance with the adopted parking standards as set out in Supplementary Planning Guidance: Kent Vehicle Parking Standards, 2006;
- In accordance with policy CS14, the Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area;
- In accordance with policy CS19, the design and layout will accord with the Council's adopted Supplementary Planning Guidance, 1996: Residential Layout Guidelines. This sets out standards for internal room dimensions and for garden sizes. This should be read in conjunction with the Government's Nationally Described Space Standards, 2015;
- In accordance with Paragraph 123 of the NPPF, it is especially important for decisions to avoid homes being built at low densities and to ensure that developments make optimal use of the potential of each site;
- In accordance with Policy CS12, there will be no loss of biodiversity in the Borough and opportunities to enhance, restore, re-create and maintain habitats will be sought;
- In accordance with Paragraph 170 of the NPPF, any development should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity

GBC Leisure & Resilience Manager

The main issue from a leisure perspective will relate to the actual loss of amenity greenspace/playing field land. The site is included in the April 2016 Open Space Strategy (OPS) and Playing Pitch Strategy (PPS) compiled and developed independently by Knight, Kavanagh & Page. The OPS element does show that the site scores fairly high in terms of quality and value, although access to the site has been formally closed off to the public for permissive use. The site is also identified in the PPS as a lapsed/disused junior playing pitch site. There is an overall shortfall of pitches within the Borough, especially junior pitches to satisfy current but also future demand. This is supported by the increasing number of junior teams and associated leagues that contact the council during the course of the year looking for local sites to access. The PPS outlines the need for using lapsed sites, such as the detached playing field at Whitehill, in order to help meet current and future demand.

With regards to playing pitches, the PPS summarises;

- There is not enough accessible and secured community use provision to meet current demand in Gravesham.
- Subsequently, there is an insufficient supply of quality and appropriately maintained pitches in Gravesham.
- Factoring in future demand results in shortfalls across all football pitch types.
- Subsequently, there is not enough accessible and secured community use to meet future demands in Gravesham.

Therefore, in order to move forward with this particular site we would require an explanation as to how the applicant would provide replacement pitch provision of an equivalent or better quantity and quality in a suitable location in order to meet the requirements as set out in the NPPF. Also, the application does not mention what will become of the rest of the site and therefore we assume that this will be left in situ causing further issues in the future. For example, the other section could be used as part of a mitigating package for developing the site as an area of public amenity green space operated by the developer under a management agreement or by KCC, the landowner, itself.

GBC Horticultural Services Officer

I have reviewed the currently available information and have the following comments;

- Although the land to the north of the site, (currently designated as open space), will be lost to the development, the southern end will be opened up for general amenity use. In recent years, there has been no public access to the site at all so this development will actually benefit the local area and provide much needed accessible amenity space.
- The plans indicate that a large number of trees are due to be planted as part of the scheme. This is welcomed and will not only help to screen the new development from existing residents but will also help mitigate any trees that are lost due to the development.

GBC New Homes Development and Strategy Manager

The site is located to the rear of Turner House, a social housing block owned and managed by Gravesend Churches Housing Association, with access from Whitehill Road. I note that the proposal is to develop approximately 50% of the site which equates to approximately 0.52 HA as stated on the site location drawing and to deliver 14 residential dwellings.

This proposal falls beneath the 15 dwelling threshold for affordable housing provision but is over the 0.5 HA threshold applied to sites within the urban area (Policy CS16). The affordable housing obligation for this proposal would therefore be 4 dwellings.

Looking at the Council's housing register, the Borough currently has a high demand for both 1 and 2 bed homes and a medium requirement for 3 bed homes. There remains a demand for 4 bed homes albeit a lesser need than for smaller units.

Based on the size and type of homes proposed on this site, the affordable housing obligation should consist of a mix of 2 and 4 bed homes to help meet the housing needs of local people.

GBC Highways Development Management Officer

Due to the size of the proposed development I would recommend the applicant to consult Kent County Council on their proposals as the highway authority would usually be looking at adopting the road that serves 5 or more properties and I have doubts that the current layout would be acceptable to them.

The proposal at least in part appears to rely on a shared surface approach which currently is not necessarily in favour due to issues experienced by the blind and partially sighted in wayfinding and Department of Transport Guidance has been withdrawn on such schemes (LTN1/11). There should be a continuous footway with a kerb face that can be followed by a person using a stick or guide dog and clearly identifies the boundary between carriageway and footway at crossing points. There also seems to be a growing awareness that the mentally impaired require a formal highway layout.

Applicant should note that car parking spaces parallel to the highway should be a minimum of 6 metres long plus tapers at either end to ease access and egress. All perpendicular parking spaces should be a minimum of 5m deep by 2.5 metres wide, although there is an argument that the depth should be increased to 5.5 metres with a buffer at 5 metres to prevent vehicles overhanging the paths to the properties.

All properties should have at least one Electric Vehicle charging point cable of a minimum 7kW continuous supply more under surge loading. Bicycle parking should be provided at one space per bedroom.

Any road lighting would require careful design to ensure that whilst the highway (carriageway and footways) is adequately lit without disturbing existing residents.

The access junction is very close to Porchfield Close and does not conform to the requirements of Kent Design, where adjacent junctions on a local distributor road should be at least 60 metres apart.

Also whilst the development does not exceed to 50 unit threshold careful consideration should be given to emergency vehicle access in case of an incident that obstructs the access road, (particularly fire engines)

External Consultation Responses

Sport England

Sport England - Statutory Role and Policy

It is understood that the site forms part of, or constitutes land last used as playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). However, it appears that the playing field has not been used for at least five years and therefore that Sport England is not a statutory consultee. Nevertheless, Sport England would still expect to be consulted on any subsequent planning applicant, albeit as a non-statutory consultee.

Notwithstanding the non-statutory nature of the consultation, Sport England will consider any subsequent application in light of the National Planning Policy Framework (particularly Paragraph 97) and against its own playing fields policy, which states:

'Sport England's will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

These are:

| Sport England Policy Exceptions | |
|---------------------------------|--|
| E1 | A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport. |
| E2 | The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use. |
| E3 | The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none">▪ reduce the size of any playing pitch;▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);▪ reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;▪ result in the loss of other sporting provision or ancillary facilities on the site; or▪ prejudice the use of any remaining areas of playing field on the site. |
| E4 | The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field: <ul style="list-style-type: none">▪ of equivalent or better quality, and▪ of equivalent or greater quantity, and▪ in a suitable location, and▪ subject to equivalent or better accessibility and management arrangements. |
| E5 | The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field. |

Sport England's Playing Fields Policy and Guidance document can be viewed at www.sportengland.org/playingfieldspolicy

Sport England' applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago. Lack of use should not be seen as necessarily indicating an absence of need for playing fields in the locality. Such land can retain the potential to provide playing pitches to meet current or future needs.

Assessment against Sport England Policy

The proposal is for the development of the former playing field for 14 dwellings with the southern half being retained as an undeveloped (amenity) field. It is clear that policy exceptions E2, E3 and E5 do not apply. I am not aware that the enquirer is looking to replace the total area of the site to be lost including that proposed to be retained as amenity open space with an new area of playing field land of equivalent or greater quality and / or quantity and therefore policy exception E4 is also not met.

With regard to exception E1, the site was previously marked out as a youth 7v7 football pitch. The Council's adopted and published Playing Pitch Strategy 2016 identifies at para 1.4 page 5 in its headline findings for football, a future demand shortfall of 4 x 7v7 match sessions in urban areas at 2028.

At Part 3 page 11 it is stated;

“Utilising lapsed/disused sites – using lapsed sites such as the Former Fleet Leisure, Whitehill Primary School (detached pitch), Copperfield Academy (detached), Culverstone Recreation Ground, North Kent College, Shears Green Junior school and Holy Trinity Primary School as well as sites currently unmarked could potentially provide an additional two adult, one youth 11v11, four youth 9v9 and two mini 7v7 pitches. This would help meet current demand identified in the Urban Analysis Area. It would also help to meet future shortfalls expressed for youth 9v9 and mini 7v7 in the Urban Analysis Area. For the latter it would meet all future shortfalls in 7v7 across Gravesham”.

At part 4, page 18 strategic recommendations, Aim 1) sets out a need to protect the existing supply of playing pitch facilities in the Borough including lapsed and disused sites (lapsed being within 5 years and disused for longer) through local planning policy.

Furthermore, at page 50 of the PPS the site is considered where the recommended action is to; *‘Explore opportunities to bring the site back into use to meet identified shortfalls in the Assessment. If bringing the site back into use is not feasible or sustainable or disposal of the site is inevitable it must meet the requirements of the second criterion of paragraph 74 of NPPF. This requires replacement provision of an equivalent or better quantity and quality in a suitable location.’*

Therefore from the above, Sport England considers that Exception E1 of its playing field policy would not be met and furthermore, that a need to re-establish the playing pitch here has been identified.

The loss of the playing field would also be contrary to policy CS13 of the Gravesham Local Plan Core Strategy that a paragraph 5.8.7 states; *The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.* The Council's Local Plan 5 year review does not proposed that any modification to the existing policy is made.

Conclusion

Given the above assessment it is most likely that Sport England would **object** to any subsequent planning application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

Kent County Council Development Contributions

We have now received preliminary assessments for our clients in KCC services, and would advise as follows:

The provisional assessments currently for the site are:

- Primary – currently no requirement
- Secondary @ £4540 per applicable house (x14) ('applicable excludes 1 bed of less than 56sqm GIA)
- Libraries @ £55.45 per household (x14)
- Adult Education @ £16.42 per household (x14)
- Youth Service @ £65.50 per household (x14)
- Social Services @ £146.88 per household (x14)+
- Waste @ £221.92 per dwelling (x14)

Accessible and Adaptable Homes

The Ministry of Housing, Communities and Local Government identified in June 2019 guidance Housing for older and disabled people the need to provide housing for older & disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. Accessible and adaptable housing provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. Kent Social Care request these dwellings are built to Building Regulations Part M4 (2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupant's requirements.

Broadband

The NPPF (paragraph 112) and The Department for Digital, Culture, Media and Sport require full fibre connection to new developments being gigabit capable fibre optic to the premise connection for all. A Planning Condition will be required to provide 'fibre to the premise' (FTTP) broadband connections to all premises of gigabit capacity. Developers are advised to make early contact with broadband providers, as there can be a lead in time for cable installation and associated infrastructure.

Condition: Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High Speed Fibre Optic (minimal internal speed of 1000mb) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.

Reason: To provide high quality digital infrastructure in new developments as required by paragraph 112 NPPF.

Note: This is a current assessment; final assessment will be undertaken at the date of planning application. Final requirements may vary due to ongoing planning applications in the vicinity, changes in forecasts, rolls, build costs, projects etc.

Kent Police Designing Out Crime Officer

Having reviewed the documentation kindly supplied, I have the following recommendations and comments to make:

1. This appears to be a revised scheme for previous planning application PRE 20190470 for the development of 34 residential units.
2. The use of the Secured by Design (SBD) Homes 2019 initiative is recommended.
3. All side and rear boundaries should be 1.8m in height, as per SBD Homes 2019. Any Arris or other fencing support rails should face into the gardens so they cannot be used as climbing aids.
4. The rear access to the existing properties numbers 1 to 6 of Porchfield Close and behind the proposed plots 1 to 4 is an area of concern, as this will create a service path running behind 10 properties in total. Although the proposed service path appears to only serve the existing 6 properties, with the new plots being served by individual gates to the front. Sections 13.1 and 13.2 of SBD Homes 2019 states:

13.1 Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.

13.2 It is preferable that footpaths are not placed to the back of properties. If they are essential to give access to the rear of properties they must be gated. The gates must be placed at the entrance to the footpath, as near to the front building line as possible, so that attempts to climb them will be in full view of the street. Where possible the street lighting scheme should be designed to ensure that the gates are well illuminated. Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb or remove from their hinges and serve the minimum number of homes, usually four or less.

13.3 Gates will generally be constructed of timber when allowing access to the rear of a small number of dwellings. However in larger developments where the rear footpath provides access to a large number of properties then a gate constructed of steel may be required by the DOCO. Substantial purpose made gates meeting LPS 1175 Security Rating 1 (A1) or Sold Secure Silver (minimum) standard are available and may be required by the DOCO. Any gate providing access to the rear of dwellings must be designed to resist climbing, forced entry and allow a high degree of surveillance of the footpath from the street.

With the above in mind, it is important that this service path is fully gated as detailed above. Any Arris or other fencing support rails should face into the gardens so they cannot be used as climbing aids. Additional trellis topping can also be installed as an added layer of security.

5. Doorsets and windows should be certified to PAS24:2016 as per SBD Homes 2019.

6. Lighting. We appreciate the constraints of the site and the potential of light overspill to existing residential gardens. However, the roads should be appropriately lit to BS 5489:1 - 2013.

7. The main access road into the site may require appropriate lighting in the interests of site safety. Parking restrictions will need to be considered, if not already the case, along this route to allow unobstructed access for emergency vehicles at all times.

We welcome a discussion with the applicant/agent about site specific designing out crime should this application proceed. If the points above are not addressed, they can affect the development and local policing. Current levels of reported crime have been taken into account.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

KCC Heritage and Conservation

The site does not lie within a presently defined area of Archaeological Potential on the Kent Historic Environment Record. However, these mapped areas of potential are based on past discoveries and this area has had little in the way of archaeological investigations since development in the 19th century. The situation of the site is potentially favourable for past human activity, being on chalk at c.35m AOD, with a dry valley just to the east. Historic mapping demonstrates that the site has been used orchards, gardens and playing fields since the mid-19th century and therefore any potential below-ground archaeological remains may be relatively undisturbed.

Given that the area of proposed development is relatively extensive I would recommend that the applicant produces an archaeological desk-based assessment for the site and undertakes geophysical survey (if conditions allow) to begin the process of assessing and evaluating the site's below-ground archaeological potential. Subject to this work and any ecological constraints I would recommend evaluation trial trenching subsequently. I would be happy to provide the applicant with further details on how to go about this work should they require it.

Planning Analysis and Appraisal

Introduction

The site was the subject of a previous pre-application enquiry in 2015 (PRE20150590) from the current owners (Kent County Council) and the same agents (DHA).

There was also a more recent pre-application enquiry (PRE20190470) for development of the whole site for a fully affordable housing development.

The site is not an allocated site for housing.

The site would not be classed as a brownfield site or previously developed land (PDL) as defined in the glossary (Annex 2) to the NPPF - the definition excludes '*land in built-up areas such as residential gardens, parks, recreation grounds and allotments*'.

The site is a playing field within the definition of a playing pitch in the Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended.

"Playing pitch" means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo;

However there was a previous proposal for the development of this site for housing that was supported at officer level intended to be considered at a committee level in 2006 but then subsequently withdrawn. Generally however there is no objection per se to the development of the site for housing.

This is nevertheless a very broad generalisation and there are a number of substantive planning, highway and other material planning issues, and particularly in relation to the loss of open space/playing fields, that come into play and that need very careful consideration in the assessment of this pre-application proposal and any likely future planning application.

Principle of the Development

The site to which this pre-application enquiry relates is not specifically allocated for residential development or any other forms of development as such in the adopted development plan (Gravesham Local Plan Core Strategy 2014 and saved policies of the Gravesham Local Plan First Review 1994) being within an urban area and outside of the Gravesend town centre opportunity area. Therefore development proposals would need to be judged against the general policies of the development plan.

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.

Evidence now available shows that the Council is not able to currently demonstrate a five-year housing supply. This engages the first part of footnote 7 of the NPPF and this means for decision-taking that planning permission for applications involving the provision of housing should be granted in line with the requirements of the NPPF Para 11(d) unless:

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

Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) prioritises development in the urban area as a sustainable location for development. It seeks to achieve this by promoting regeneration by prioritising redevelopment and recycling of previously developed land.

The site is within a highly sustainable location and on a direct bus route within High Street Northfleet and the site is close to existing bus stops and within a comfortable walking distance of local shops and close to a local primary school.

The residential development of the site also supports the Government's greater emphasis on delivering and prioritising housing land as set out in the current version of the NPPF (section 5 - delivering a sufficient supply of homes).

The redevelopment of sites within the urban area can help reduce the pressures for the release of fresh land in rural locations, which is of particular importance in a Local Authority constrained by Green Belt policy. This would be in conformity with paragraphs 118 and 137 of the NPPF. Evidence of land scarcity can be found in paragraph 2.14 of the Site Allocations: Issues and Options consultation document, which identifies a shortfall in the supply of housing sites of 2,000 dwellings.

Therefore the development of the site for some 34 units would offer a modest if not insignificant contribution towards meeting this local need and, accordingly, weighs in support of this pre-application enquiry. However, this has to be balanced against other requirements of the NPPF and in particular paragraph 127 and 130 of the NPPF which requires development to be added to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Development on this site should meet the requirements of Policy CS14 (LPCS), where the Council expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area. The area is within a mixed area and there are nearby some new flatted schemes.

Policy CS15 (LPCS) requires that all new housing will be developed at a density which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration, new residential development within the urban area will be expected to achieve a minimum density of 40 dwellings per hectare. It is clear that whilst Policy CS15 (LPCS) seeks to achieve this minimum density, this should not be at the expense of compromising the character of the surrounding area.

Based on the applicant's site area the density of the development would be 40 dwellings per hectare thus according with the target minimum density.

Loss of Open Space/Playing Pitches

Most critically the weight in support of the development for the provision of housing has to be balanced against the loss of open space and playing pitches.

The consultation response from Sport England advises that they would object to any subsequent planning application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

The GBC Planning Policy assessment points out that policies CS12 and CS13, taken together with paragraph 97 of the NPPF provide a strong basis for the retention of the site for open space and it will be for the applicant to show whether development for housing would be more appropriate in the light of other policies in the Core Strategy and the material considerations in the NPPF, which have to be taken into account in the decision making process. It is also indicated that site was included in the April 2016 Open Space Assessment and Playing Pitch Assessment compiled and developed independently by Knight, Kavanagh & Page and in its recommendations, the Study stated that it is important for all open space to be protected as a starting point. The Study identified the site as amenity open space, given that it had not been used as a playing field for over 20 years, and concluded that it enhanced the appearance of the residential area. It assessed the site as having high quality and high value and as such, it considered it as a key form of open space which it was important for the Council to maintain if possible.

The Policy advice points out:

- No evidence has been submitted which demonstrates that a thorough assessment has been carried out to show that the land is surplus to requirements, nor that any efforts have been made to market the site as open space or otherwise arrangements have been attempted to secure an alternative user.
- No evidence has been submitted to demonstrate that any loss of open space would be replaced in terms of quantity and quality, nor has it been demonstrated that the undeveloped part of the site would be accessible or otherwise useable as open space and hence would be an integrated part of any planning application.

The GBC Leisure & Resilience Manager advises that in order to move forward with this particular site we would require an explanation as to how the applicant would provide replacement pitch provision of an equivalent or better quantity and quality in a suitable location in order to meet the requirements as set out in the NPPF. Also, the application does not mention what will become of the rest of the site and therefore we assume that this will be left in situ causing further issues in the future. For example, the other section could be used as part of a mitigating package for developing the site as an area of public amenity green space operated by the developer under a management agreement or by KCC, the landowner, itself.

In respect of the previous proposal for the development of this site in 2006 Sport England did not raise an objection to the loss of the playing field but they did make it clear that support was conditional on the receipt from the sale of the playing field being used to provide sports facilities at the school and that those new facilities at the school were available for community use and with provision of changing facilities.

It is acknowledged that the site has some similarities in relation to the development of a similar but smaller detached playing field at Dover Road Northfleet (in connection with the Copperfield Academy) and which was the subject of a planning application in 2018 (20180764), and also from the same applicants, Stonechart. However with that site it had been declared surplus to Kent County Council requirements in respect of both the school's need and KCC's property portfolio and had been previously marketed as a residential, commercial or mixed use development opportunity. The planning assessment looked at as to whether realistically there was any prospect of a developer wanting to invest in that site for the purpose of retaining an open space or as a sports facility. It was concluded that the current open space was not in a particularly well placed location being somewhat detached from surrounding properties and not well overlooked. It was also of a small size not being of a size to make it usable as a full sized playing pitch and as such would not be attractive to a local sports club. As an open space it did have a low value and quality as acknowledged in the Open Space Assessment (April 2016) and Open Space Standards Paper (August 2016) published by the Borough Council to support the adopted Core Strategy. The Borough Council would also not want to assume responsibility for its future management and maintenance if it remained as an open space.

It does appear that in respect of the site the subject of this pre-application enquiry further work needs to be undertaken in relation to the whether the site is actually surplus to needs, whether there is any prospect of the site being used in the further for open space including potential marketing of it, and how the loss of open space and playing pitches can be properly mitigated and re-invested locally to provide an equivalent benefit elsewhere.

Consideration also needs to be given as to how the remainder of the site can be factored in and how this might provide real open space benefit for the local community.

This further work is considered necessary prior to the submission of any future planning application for the development of the site.

Design and Layout

Policy CS19 of the Gravesham Local Plan Core Strategy (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The National Planning Policy Framework (NPPF) in Section 12 (Paragraphs 124 - 132: Achieving well-designed places) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development. It also states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

The design and layout has not been independently assessed as the pre-application enquiry is seeking comments on the general principle of the development rather than the detailed design and layout, there being no elevational drawings at this stage with only the illustrative layout plan to give a flavour of the proposed development.

A few points though:

- The layout appears to show some planted strips that are not within the curtilage of dwellings and it is unclear who will be responsible for them and how they will be maintained;

- The garages appear to be poorly located in relation to either the host or neighbouring dwellings;
- There appears to be limited turning for parking spaces and garages;
- Scope for visitor parking needs to be considered;

Impact on local Residential amenity and existing residents

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. Policies seeking to protect amenity and ensure acceptable future living conditions are included in the Local Plan Core Strategy. The NPPF also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to “secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”.

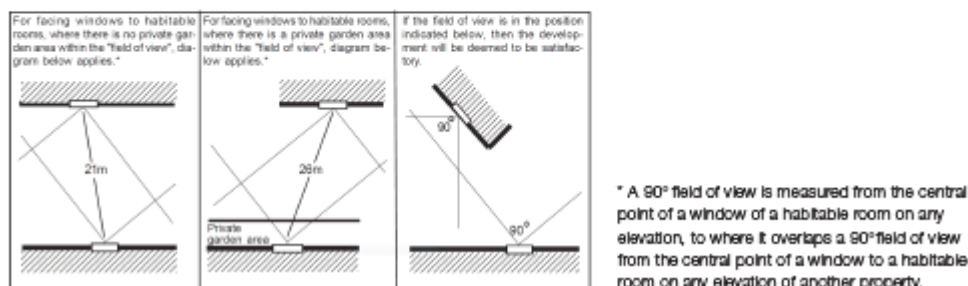
Safeguarding residential amenity, in terms of privacy, daylight and sunlight and ensuring that all development proposals are fit for purpose and adaptable to meet the need of users’ are important considerations referred to in Local Plan core strategy policy CS19.

In submitting a formal planning application you should ensure that your proposal meets the guidance set out in Supplementary Planning Guidance Note 2 Residential Layout Guidelines (Revised June 2020), in particular in respect of overlooking neighbouring properties and privacy distances.

https://www.gravesham.gov.uk/_data/assets/pdf_file/0003/1012197/SPG2-Residential-layout-guidelines-inc-Housing-Standards-Policy-Statement-2015.pdf

- 18 In addition, a minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling.
- 19 For “single aspect” dwellings, the minimum distance from the window of a habitable room to any house wall of equivalent height containing no habitable room windows can be reduced to 11 metres.
- 20 In all cases, the privacy distances will be applied on the basis of the principles set out in figure 1 on “fields of view” which are illustrated below.

Figure 1



An assessment should be made of the impact on sunlight/daylight of neighbouring properties.

There only appears to be a distance of 13m between the flank elevation of unit 1 and the rear of properties in Porchfield Close. There might also be non-compliance with local standards in relation to the privacy distance between the rear of unit 5 and the facing rear dwelling in Porchfield Close.

It is noted that in respect of the previous application for the development of this site in 2005 there was substantial local opposition to the application with 100 objections and in addition a petition signed by 54 residents and although there were objections to the principle of the development including the loss of open space a number of the objections were to concerns relating to loss of privacy and overlooking.

The impact on the amenity of future residents of the development

Policy CS19 (LPCS) 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, should accord with the adopted GBC Residential Layout Guidelines'.

The Supplementary Planning Guidance Note 2 Residential Layout Guidelines (revised June 2020) referred to above also sets out the Council's standards in relation to private garden areas and internal space standards.

The introduction of new housing technical standards on 1 October 2015 means that we now interpret Tables 1 and 3 of the Residential Layout Guidelines July 1996 in accordance with the new standards. You can view the implications in our Housing Standards Policy Statement by using the following link:

https://www.gravesham.gov.uk/_data/assets/pdf_file/0003/1012197/SPG2-Residential-layout-guidelines-inc-Housing-Standards-Policy-Statement-2015.pdf

The National Technical Standards require bedroom sizes of 7.5m² for a single bedroom and 11.5m² for a double bedroom.

Consideration needs to be given as to whether there is sufficient privacy between the dwellings as proposed within the site.

Highways and Parking

The proposed development needs to be considered against Gravesham Local Plan Core Strategy Policy CS11 which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This stance is reflected in the NPPF (section 9) which indicates that all development that generates 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 there is an unacceptable impact on highway safety or the residual cumulative impact of development is severe.

In this instance the nature and scale of the development does not require a full transport statement or transport assessment (the trigger is 100 dwellings under SPG4) but it would be helpful in support of any future planning application if a transport note or assessment is provided.

Highway access/parking provision/sight lines etc. are issues that need to be properly explained and show how adopted standards can be met and adopted policies complied with at a national and local level.

The Council's approach to parking requirements is in accordance with the adopted Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006) and endorsed as supplementary guidance by GBC on 6 July 2009.

These are set out as maximum standards although it should be noted that the government abolished national maximum parking standards in 2011 and the ministerial statement in March 2015 indicated that the imposition of maximum parking standards lead to blocked and congested streets and pavement parking and arbitrarily restricting new off-street parking spaces does not reduce car use. The adopted standards therefore would normally seek to be met in full.

The residential (Class C3) parking standards are:

| Car Parking | |
|--------------------------------------|---|
| 1 bedroom | 1 space per dwelling |
| 2 and 3 bedrooms | 2 spaces per dwelling |
| Mixed Development of 1,2 & 3 bedroom | Average of 1.5 spaces across development |
| 4 or more bedrooms | 3 spaces per dwelling |
| Sheltered Accommodation | 1 space per resident warden + 1 space per 2 units |
| Notes: | <ol style="list-style-type: none"> 1. Flats and Apartment Blocks consisting of 2 and 3 bedroom units will be regarded as Mixed Developments. 2. For 1-bedroom dwellings the parking will usually be provided as a communal space. For other size dwellings part or all of the parking can be provided on a communal basis. 3. The level of car parking provision includes any garages, provided as an integral part of the dwelling or within its curtilage, and/or driveways, provided within the curtilage, subject to the preferred sizes set out in Appendix B. 4. In Controlled Parking Zones the parking provision should result in no net loss of on-street parking. |

Generally the spaces should be 5m by 2.5m increasing to 2.7m where the spaces are at the end of on aisle or 2.9m next to walls etc. of buildings.

If the principle of development of this site were to be acceptable then the development would have to be fully self-contained to avoid the risk of spillage of parking outside of the site.

Kent County Council as the highway authority will offer its own pre-application service. The necessary contacts are:

David Barton, Senior Development Planner, Kent County Council Highways & Transportation Tel: 07876 390087 email: David.Barton@kent.gov.uk

Nevertheless the development proposals have been considered at a local level by the Council's Highways Development Management Officer. He has raised a number of issues

notably in terms of whether the access as proposed to serve the development would be acceptable because of the short distance to the junction with Porchfield Close and whether the current layout would be acceptable to KCC as an adoptable highway. He also sets out a number of detailed comments relating to the shared surface arrangement, car parking requirements, and requirements for electric vehicle charging and cycle provision, as well as emergency vehicle access.

It was noted by the applicants at the pre-application virtual conference meeting (28 February 2020) that sight line visibility to the access would not be constrained by the existing trees either side of the access point and which are not within the applicants ownership although this would need to be clearly demonstrated in any future planning application. The applicants will need to demonstrate that they have sufficient control over the area within the splays to maintain them in the future.

Other Material Planning Considerations

Contamination and Ground Stability

It is noted from previous planning records that there was some filled material imported on to the site and it would therefore be appropriate that this is investigated as part of any planning submission and this may be a pre-commencement of development requirement.

Drainage/Flood Risk

A Flood Risk Assessment (FRA) needs to accompany a planning application for the development as proposed. There will be a requirement for a SUDS scheme.

The Lead Local Flood Authority is undertaken by Kent County Council Sustainable Drainage Team Leader being Bronwyn Buntine Tel: 03000 41 41 41 Bronwyn.Buntine@kent.gov.uk

or Neil Clarke, Senior Flood Risk Project Officer suds@kent.gov.uk

Southern Water and Environment Agency would need to be consulted at the planning application stage and it may be beneficial for an applicant to undertake early discussions with those undertakers.

Trees and Landscaping

There are no tree preservation orders (TPO's) in place in relation to this site but the comments of the GBC Horticultural Services Officer need to be taken into account and a survey of the quality and importance of any existing trees on the site should be undertaken showing what trees are retained and the method of protection and how they can be incorporated into the overall design and layout.

Biodiversity, Appropriate Assessment and the SAMMS Tariff

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites

that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site).

Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity.

Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them, as new housing development is likely to lead to further increases in recreational use of the sites. This means that further declines in the bird population cannot be ruled out.

To address this decline, the Borough Council has adopted a tariff which is imposed on all new dwellings (including flats) that are built within the 6km zone to pay for a Strategic Access Management and Monitoring Strategy (SAMMS).

The new dwellings would be liable for a tariff payment which is currently set at £250.39 per dwelling unit. Payment is normally either collected by s106 agreement (if one is required) or a unilateral undertaking which should accompany your application or through the SAMMS agreement form

https://www.gravesham.gov.uk/_data/assets/pdf_file/0003/470937/SAMMs-Contribution-Agreement.pdf

The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However a more recent Court of Justice European Union (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between “the plan or project” itself and “measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

Further information and evidence can be found via the following link:

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

Affordable Housing

The Council's approach to the provision of affordable housing is set out in Policy CS16: Affordable Housing of the Gravesham Local Plan Core Strategy which requires the provision of affordable housing on all new housing developments of 15 dwellings or more and that the amount of affordable housing to be provided by private housing sites above the threshold is 30% in the urban area.

In the light of the overwhelming need for affordable housing and whilst understanding the potential viability issues at this stage the Borough Council would expect that the development would make provision in accordance with the policy.

As indicated in the consultation response from the Council's New Homes Development and Strategy Manager although the site falls beneath the 15 dwelling threshold for affordable housing provision it is over the 0.5 HA threshold applied to sites within the urban area (Policy CS16). The affordable housing obligation for this proposal would therefore be 4 dwellings.

Other Social and Community Contributions

The number of units as proposed will be likely to result in development contribution requests to Kent County Council for possible primary and secondary school provision as well as potentially for libraries, community learning, youth, social care and waste plus a requirement for provision of High Speed Fibre Optic broadband connection.

Heritage and Archaeology

There might be a need for a Desk Based Assessment (DBA) to accompany an application and possible requirement for archaeological field evaluation works.

The applicants are advised to contact Kent County Council.

Casper Johnson, Senior Archaeological Officer, Heritage Conservation, Kent County Council, Invicta House, Maidstone, ME14 1XQ
Tel: 03000 419388 Casper.Johnson@kent.gov.uk

Security - Secured by Design

The applicants need to discuss security and designing for crime prevention at an early stage with Adrian Fromm, Crime Prevention Design Advisor, Community Safety, Strategic Partnerships Command, Kent Police. Tel: 01622 653234. Email

adrian.fromm@kent.pnn.police.uk

Secured by Design initiatives need to be considered ensuring compliance with the Kent Design Initiative Protocol

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

http://www.kent.police.uk/advice/design_for_security/attachments/doc_kdi_1304_guide.pdf

Refuse

The development will need to demonstrate compliance with the Council's standards for refuse and waste storage on the site

The refuse requirements are:

Flats

Refuse - 1 x 1,100ltr bin per 6 flats

Recycling - 1 x 1,100ltr bin per 6 flats with special recycling lid

Food Waste - 1 x 180ltr bin per 10 flats with an individual 5ltr caddy per flat

Houses

Refuse - 1 x 180ltr bin (grey body and lid)

Recycling - 1 x 240ltr bin (grey body and green lid)

Food Waste - 1 x 23ltr bin (black body and orange lid) with an individual 5ltr caddy per property (silver body and lid)

Collection for refuse and recycling are now once every two weeks with food waste collected weekly. It is the developer's responsibility to provide the bins although the Council's waste management team will happily assist the developer if required.

The location of bin storage should be well designed and discreetly sited but allowing access for residents and ease of collection

The immediate area outside the bin store should be level with the road, should not include an incline and the installation of a drop kerb where necessary is mandatory. Car parking spaces should not be allocated immediately in front of the access to the bin store. It is recommended that bin stores are fitted with a lock which is accessed via a key or a key code pad.

Collections from sites will not occur until containers are in place. It is the responsibility of the developer to collect and remove any waste at their cost until the Council is satisfied that all waste requirements have been met. All complaints in regard to non-collection due to the fault of the developer will be passed onto the developer for response.

The Council should be informed at least two weeks prior to collections taking place.

Construction and Phasing

A Construction Code of Conduct will be required as part of any planning submission.

Details will be required of construction compound including details of working areas; access arrangements during construction; site huts, contractor accommodation and associated facilities; details of temporary lighting proposed to site compound, access and works area; and details of materials storage on site.

Details of the type and the location of any wheel washing and chassis cleaning equipment to be provided on the site will also need to be submitted.

Written noise and dust management plan covering the construction and demolition phases of the development

Works of Construction Informative:

Hours of work of construction site plant, equipment and machinery, should be restricted to not earlier than 7.00 a.m. and not later than 6.00 p.m. weekdays and Saturday working should be restricted to not earlier than 8.00a.m. and not later than 1.00 p.m. No work shall be carried out on Sundays, Bank or Public Holidays.

i. Suitable sound attenuation shall be used at all times in respect of all plant, machinery and equipment in operation on site in order to aid prevention of noise nuisance. Compliance with BS 5228: Part 1: 1984 and subsequent amendments regarding the use of equipment on site will be required in appropriate cases.

ii. A suitable method of control shall be used in order to aid prevention of dust nuisance arising from work activities on site.

iii. Burning of waste materials shall not be carried out on site. Such materials are to be stored in a suitable receptacle, as far from residential accommodation as reasonably practicable, pending disposal off site.

iv. Adequate arrangements shall be made to remove all waste material from the site on a regular basis and to dispose of it at a suitably licensed waste disposal site.

Community Involvement

It might be useful for you to undertake community consultation.

Gravesham's Statement of Community Involvement (March 2007) sets out how and when you can get involved in preparing the Local Plan and also how we consult on major planning applications. A copy of the adopted Statement of Community Involvement can be found via the following link.

<http://www.gravesham.gov.uk/home/planning-and-building/local-plan/statement-of-community-involvement>

For your information the details of the Local Ward Councillors (Whitehill) are as follows:

Cllr Les Hoskins
73B Whitehill Road
Gravesend
Kent
DA12 5PF
Phone: 07905 822152
Email: les.hoskins@gravesham.gov.uk

Cllr Tony Rana
97 Whitehill Road
Gravesend
Kent
DA12 5PL
Mobile: 07851 033934
Email: tony.rana@gravesham.gov.uk

Central Ward is also immediately adjoining the site

Documentation to Accompany a Future Planning Application

The Local Planning Authority suggests that the following documents/plans might accompany any future planning application for the development as proposed:

- Application Form;
- Supporting Letter;
- Suite of Plans/Drawings including topographical survey, sections, phasing, context plans, large scale details and any demolition works etc.;
- Planning Statement;
- Design and Access Statement;
- Marketing Report;
- Open Space Assessment Report;
- Transport Statement/Note;
- Travel Plan;
- Cycle Storage Details;
- Landscaping Strategy;
- Visual Impact Assessment;
- Ecological/Biodiversity Appraisal;
- Flood Risk and Drainage Strategy;
- Archaeological Desk-Based Assessment;
- Noise Impact Assessment;
- Lighting Impact Assessment;
- Sustainability/Energy Statement;
- Refuse Strategy;
- Utilities/Services Report;
- Statement of Community Engagement;
- Planning Conditions Statement including any agreement to pre-commencement conditions; and possible Heads of Terms for a s106 legal agreement;

Conclusions

The proposals have been assessed against the relevant adopted Development Plan policies and national policies in the NPPF, highlighting those issues that you will need to address should you wish to submit a planning application.

In principle whilst there is no objection to the development of the site for residential purposes per se there is a fundamental issue relating to the loss of playing fields and the potentially overriding objection from Sport England and further work ought to be undertaken prior to the submission of any future planning application in relation to the whether the site is actually surplus to needs, whether there is any prospect of the site being used in the further for open space including potential marketing of it, and how the loss of open space and playing pitches can be properly mitigated and re-invested locally to provide an equivalent benefit elsewhere.

There are also a number of issues and concerns relating to the design, layout, impact on local amenity and the future occupants of the development and access and parking that need to be considered prior to any formal planning submission and also arising from the various consultation comments.

It is hoped that this information and this full analysis and assessment is of use to you.

The pre application enquiry number PRE20200175 is now considered closed but please do not hesitate to respond if you have any queries in relation to the specific content of this response.

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

Peter Price, Principal Planner

Date: 14 July 2020

File: H: Plan/Typing/General/Peter/Pre Application Draft Responses - PRE2020175 - Residential Development - Land rear of Turner House Whitehill Road Gravesend