# **Local Plan Review**

## Spatial Policies

### CS01: Sustainable Development

#### Policy Overview

Requires applications that accord with the development plan to be approved unless material considerations indicate otherwise. Presumption in favour of sustainable development applies.

#### Conformity with NPPF 2019 Ministerial Statements

1. Introduction (para. 2); 2. Achieving sustainable development (para. 10); 2. Achieving sustainable development: The presumption in favour of sustainable development (para. 11-14); 3. Plan-making: Strategic policies (para. 23);4. Decision-making: Determining applications (para. 47 and 49); 15. Conserving and enhancing the natural environment: Habitats and biodiversity (para. 177).

#### Recommendation

Policy requires no modification.

### CS02: Scale and Distribution of Development

#### Policy Overview

Quantifies total dwelling (6,170) and employment floorspace (186,490 m2) provision and phasing up to 2028. Allocates dwelling no. and floorspace m2 to Opportunity Areas and Coldharbour Road Key Site and also Rest of Urban Area and rural settlements inset from Green Belt. Prioritises development in urban area as sustainable location. Green Belt policies apply to development proposals outside settlements inset from the Green Belt. Commitment to strategic Green Belt boundary review up to 2028 and beyond.

#### Conformity with NPPF 2019 Ministerial Statements

Housing 2. Achieving sustainable development (para. 8(b)); 3. Plan-making (para. 15); 3. Plan-making: Strategic policies (para. 20(a)); 5. Delivering a sufficient supply of homes (para. 59 and 65); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 67); 5. Delivering a sufficient supply of homes: Rural housing (para. 77 and 78). Employment 2. Achieving sustainable development (para. 8(a)); 3. Plan-making (para. 15); 3. Plan-making: Strategic policies (para. 20(a)); 6. Building a strong, competitive economy (para. 80 and 81(b)). Green Belt Protection Policies 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 143-147). Green Belt Boundary Review 1 3. Protecting Green Belt land: (para. 136 and 137).

#### Recommendation

Policy requires modification in respect of the Borough’s objectively assessed development needs. This may also necessitate a modification to the development strategy, Green Belt boundaries and the duration of the plan period. However, this can only be done via the plan making process i.e. the Local Plan Core Strategy Partial Review and development of the Site Allocations and Development Management Policies document.

### CS04: Gravesend Riverside East and North East Gravesend Opportunity Area

#### Policy Overview

Sets out development requirements for Gravesend Riverside East and North East Gravesend Opportunity Area including Key Sites for housing (780) and employment (22,230 m2) i.e. the Canal Basin Regeneration Area Key Site and the North East Gravesend Regeneration Area Key Site.

#### Conformity with NPPF 2019 Ministerial Statements

Housing 2. Achieving sustainable development (para. 8(b)); 5. Delivering a sufficient supply of homes (para. 59); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 67). Employment 2. Achieving sustainable development (para. 8(a)); 6. Building a strong, competitive economy (para. 80 and 81(b))

#### Recommendation

Policy requires no modification.

### CS05: Gravesend Town Centre Opportunity Area

#### Policy Overview

Sets out Gravesend Town Centre will be principal focus for town centre related economic and social activity. This will be achieved by consolidating existing retail area, encouraging mix of employment and residential uses, creating a public transport interchange and promoting an evening economy. Sets out development requirements for Heritage Quarter i.e. mixed use: 330 dwellings, 10,500 m2 of comparison retail floorspace, some office floorspace and a hotel.

#### Conformity with NPPF 2019 Ministerial Statements

Town Centre 2. Achieving sustainable development (para. 8(a)); 7. Ensuring the vitality of town centres (para. 85); Transport 9. Promoting sustainable transport (para. 104(e)). Housing 2. Achieving sustainable development (para. 8(b)); 5. Delivering a sufficient supply of homes (para. 59); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 67). Employment 2. Achieving sustainable development (para. 8(a)); 6. Building a strong, competitive economy (para. 80 and 81(b)).

#### Recommendation

Policy requires no modification.

### CS06: Ebbsfleet (Gravesham) Opportunity Area

#### Policy Overview

Sets out development requirements for Ebbsfleet (Gravesham) Opportunity Area including Key Sites for housing (690) and employment (20,000 m2) with retail, leisure/entertainment, hotels and restaurants. Sets out Springhead Quarter Key Site will provide 690 dwellings with some supporting employment and retail employment floorspace. Sets out Northfleet Rise Quarter Key Site will provide employment led development comprising business employment floorspace, leisure/entertainment floorspace, hotels, restaurants and a local centre. Other key elements: provision of educational, health, social care, sports, community facilities, open space, public transport improvements including new bridge over Ebbsfleet Stream, enhanced transport hub at Ebbsfleet Station.

#### Conformity with NPPF 2019 Ministerial Statements

Housing 2. Achieving sustainable development (para. 8(b)); 5. Delivering a sufficient supply of homes (para. 59); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 67). Employment 2. Achieving sustainable development (para. 8(a)); 6. Building a strong, competitive economy (para. 80 and 81(b)). Transport 9. Promoting sustainable transport (para. 104(e)).

#### Recommendation

Policy requires no modification.

### CS21: Land at Coldharbour Road Key Site

#### Policy Overview

Sets out Land at Coldharbour Road Key Site will provide mixed use development of: 500 dwellings, open space, biodiversity improvements, community facilities and; potentially a new primary school on-site. Sets out Land south of Coldharbour Road will provide office and light industrial enterprise/incubation space (5050 m2).

#### Conformity with NPPF 2019 Ministerial Statements

Housing 2. Achieving sustainable development (para. 8(b)); 5. Delivering a sufficient supply of homes (para. 59); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 67). Employment 2. Achieving sustainable development (para. 8(a)); 6. Building a strong, competitive economy (para. 80 and 81(b)). Open Space 2. Achieving sustainable development (para. 8(b)); 8. Promoting healthy and safe communities (para. 92(a)); 8. Promoting healthy and safe communities: Open space and recreation (para. 96). Biodiversity Improvements 2. Achieving sustainable development (para. 8(c)); 15. Conserving and enhancing the natural environment (para. 170(a), 170(d) and 171)); 15. Conserving and enhancing the natural environment: Habitats and biodiversity (para. 174). Community Facilities 2. Achieving sustainable development (para. 8(b)); 8. Promoting healthy and safe communities (para. 91, 92(a), 92(b), 92(e) and 94). Transport 9. Promoting sustainable transport (para. 102(a), 102(c), 103, 104(a) and 104(d)).

**Recommendation**

Policy requires no modification.

## Thematic Policies

### CS07: Economy, Employment and Skills

#### Policy Overview

Quantifies total employment floorspace (186,490 m2) provision up to 2028 focussed on the Opportunity Areas/Land South of Coldharbour Road Key Site. Any additional office development directed in accordance with NPPF sequential test. Impact assessment applies to office proposals exceeding 2,500 m2 outside Town Centre if not identified in Core Strategy. Support for small/flexible industrial/office workspaces for start-up/expansion of small/medium sized enterprises. Loss of B class employment floorspace not supported unless subject to other Core Strategy policies and meeting specific criteria. Support for expansion of river-related employment. Loss of existing commercial wharves not supported unless subject to meeting specific criteria. Support for conversion of rural buildings to employment use/live-work units. Support for upgrading educational/training facilities and major development projects expected to contribute to skills training/promotion of apprenticeships/work placements.

#### Conformity with NPPF 2019 Ministerial Statements

Conforms to: 2. Achieving sustainable development (para. 8(a)); 6. Building a strong, competitive economy (para. 80, 81(b), 81(c) and 81(d) and 82); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83 and 84); 7. Ensuring the vitality of town centres (para. 85-88). Partly Conforms to: 6. Building a strong, competitive economy (para. 81(a)); 7. Ensuring the vitality of town centres (para. 89).

#### Recommendation

Policy generally conforms with the NPPF, however the 2019 NPPF now refers to only retail and leisure development at 2,500 m2 or greater outside of Gravesend Town Centre requiring an impact assessment i.e. no longer for office development. As the NPPF is a material consideration in decision taking, no modification is needed.

### CS08: Retail, Leisure and the Hierarchy of Centres

#### Policy Overview

Reinforces sustainable network and hierarchy of centres by maintaining the sub-regional role of Gravesend Town Centre; protects and enhances local centres; creates additional local centres on Key Sites. \* applies a sequential approach \* requires an impact assessment of larger retail/leisure development; \* supports development of a scale/type appropriate to centre hierarchy and character; \* resists development that adversely affects retail centre’s vitality and viability, protects lone village shops; and \* encourages mix of units. Gravesend Town Centre maintained as the highest order centre. Heritage Quarter: 10,500 m2 comparison retail floorspace at Heritage Quarter Key Site. New local centres/expansion of existing centres will be supported at specific Key Sites. Impact testing applies in accordance with NPPF.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a)); 7. Ensuring the vitality of town centres (para. 85-90).

#### Recommendation

Policy requires no modification.

### CS09: Culture and Tourism

#### Policy Overview

Seeks to maximise opportunities for expansion in culture and tourism activity inc. greater use of the river. Seeks to protect improvements to existing and supports new cultural and tourist facilities. Supports sustainable rural tourism and leisure developments. Sequential test applies.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b)); 3. Plan-making: Strategic policies (para. 20(c)); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83(c) and 83(d)); 7. Ensuring the vitality of town centres (para. 85(e), 86 and 87). 8. Promoting healthy and safe communities (para. 92); 15. Conserving and enhancing the natural environment (para. 172); 16. Conserving and enhancing the historic environment (para. 185(b)).

#### Recommendation

Policy requires no modification.

### CS10: Physical and Social Infrastructure

#### Policy Overview

Protects, retains, enhances existing physical and social infrastructure. Supports provision of additional infrastructure. Protects against loss of existing infrastructure subject to viability and alternative provision. Developers required to provide new or improved infrastructure or contribute to if proven need from new development subject to viability.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b)); 3. Plan-making (para. 16(c)); 3. Plan-making: Strategic policies (para. 20(b) and 22); 3. Plan-making: Maintaining effective co-operation (para. 25 and 26); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 72(a)); 6. Building a strong, competitive economy (para. 81(c)); 8. Promoting healthy and safe communities (para. 94); 10. Supporting high quality communications (para. 112 and 114); 11. Making effective use of land (para. 121(b)). 11. Making effective use of land: Achieving appropriate densities (para. 122(c)); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148); 14. Meeting the challenge of climate change, flooding and coastal change: Planning for climate change (para. 149 and 151(b)); 14. Meeting the challenge of climate change, flooding and coastal change: Coastal change (para. 167(b)); 17. Facilitating the sustainable use of minerals (para. 203).

#### Recommendation

Policy requires no modification.

### CS11: Transport

#### Policy Overview

Developments should mitigate impact on highways/public transport supported by transport assessments/travel plans. Transport assessments required. Parking provision in accordance with adopted parking standards. Supports proposals to improve public transport e.g. \* Fastrack/other bus priority measures; \* Key Sites include bus provision; \* transport hubs at Gravesend Town Centre and Ebbsfleet to provide interchange facilities between bus, rail, walking, cycling; and \* Ensure adequate supply of public car parking. Improvements to walking and cycling facilities and networks inc. in new development, to Town Centre and Ebbsfleet, between Northfleet and Ebbsfleet stations and along Thames (Thames Estuary Path). Land safeguarded for Crossrail Extension and protect High Speed 1 (HS1) railway. Support to improve efficiency of freight transport and alternatives to road transport. Safeguards wharves. Supports Thames passenger transport and cruise liners.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8.(a) and 8(b)); 3. Plan-making: Strategic policies (para. 20(b)); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 84); 9. Promoting sustainable transport (para. 102-111); 11. Making effective use of land: Achieving appropriate densities (para. 123(a)); 12. Achieving well-designed places (para. 127(e)); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 146(c)); 17. Facilitating the sustainable use of minerals (para. 204(e)).

#### Recommendation

Policy requires no modification.

### CS12: Green Infrastructure

#### Policy Overview

Multifunctional linked network of green spaces, footpaths, cycle routes, wildlife stepping stones, corridors will be created, protected, enhanced, maintained. Improves access within urban area, from urban to rural area, along Thames. See Fig. 19 Strategic Green Infrastructure Network. Protects designated sites for biodiversity value, the highest protection level for international designated SPA, SAC, Ramsar, then national designated SSSI, then LWS then local areas. No net loss of biodiversity. Enhances, restores, re-creates, maintains habitats in BOA and in new development. Compensation required if negative impact on protected/priority habitats can’t be avoided and development importance outweighs biodiversity impact. Conserves, restores, enhances landscape character/valued landscapes. The greatest weight given to Kent Downs AONB and setting. Proposals take account of Kent Downs AONB Management Plan, Gravesham LCA and Cluster Studies.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 3. Plan-making: Strategic policies (para. 20(d)); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 8. Promoting healthy and safe communities (para. 91(c)); 11. Making effective use of land (para. 118(a) and 118(b)); 14. Meeting the challenge of climate change, flooding and coastal change: Planning for climate change (para. 150(a)); 15. Conserving and enhancing the natural environment (para. 170-177); 15. Conserving and enhancing the natural environment: Ground conditions and pollution (para. 181).

#### Recommendation

Policy generally conforms with the NPPF, however the 2019 NPPF also requires the identification and pursuit of opportunities for securing measurable net gains in biodiversity. As the NPPF is a material consideration in decision taking, no modification is needed.

### CS13: Green Space, Sport and Recreation

#### Policy Overview

Provision for, protects and enhances quantity, quality, accessibility of green space, playing pitches, other sports facilities. Provision standards apply to new development. On-site provision required but if not possible alternative provision or enhancement of existing facilities required off-site. All cases require ongoing maintenance provision.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and (c)); 3. Plan-making: Strategic policies (para. 20(d)); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83(d)); 8. Promoting healthy and safe communities (para. 91(c) and 92)); 8. Promoting healthy and safe communities: Open space and recreation (para. 96, 97 and 99- 101); 11. Making effective use of land (para. 118(b)) and 121(b)). 13. Protecting Green Belt land (para. 141); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 145(b)) and 146(e)); 14. Meeting the challenge of climate change, flooding and coastal change: Planning for climate change (para. 150(a)); 15. Conserving and enhancing the natural environment (para. 170 and 171); 15. Conserving and enhancing the natural environment: Ground conditions and pollution (para. 181).

#### Recommendation

Policy requires no modification.

### CS14: Housing Type and Size

#### Policy Overview

Protects existing housing stock mix, resists conversion of family sized to smaller units. New development to provide range of dwelling types/sizes considering existing area character and local need. Supports sheltered housing and extra care special needs housing.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 3. Plan-making (para. 15); 3. Plan-making: Strategic policies (para. 20(a) and 20(d)); 5. Delivering a sufficient supply of homes (para. 59-61, 65 and 66).

#### Recommendation

Policy requires no modification.

### CS15: Housing Density

#### Policy Overview

Sites developed at variety of densities subject to location and accessibility to public transport. Density variations across a site to be used to develop different character areas. Density to achieve good design and doesn’t compromise area character subject to: \* urban area 40 dph min. and higher at locations close to Gravesend Town Centre and Ebbsfleet; \* rural area 30 dph min. If development fails to make efficient use of land ref. character and location may be refused permission.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 3. Plan-making (para. 15); 3. Plan-making: Strategic policies (para. 20(a) and 20(d)); 9. Promoting sustainable transport (para. 102(b)) and 106); 11. Making effective use of land (para. 117); 11. Making effective use of land: Achieving appropriate densities (para. 122 and 123); 13. Protecting Green Belt land (para. 137(b)).

#### Recommendation

Policy requires no modification.

### CS16: Affordable Housing

#### Policy Overview

Affordable Housing required on all developments: urban area 15 dwellings or more or on 0.5 ha or more; rural area 3 units or more or on sites of 0.1 ha or more in the rural area. Threshold: urban area 30%; rural area 35%. AH mix 70% affordable rented and social rented, 30% intermediate. Development subject to viability and local needs tenure mix. In Green Belt, supports limited AH in sustainable location for proven, justified local need and occupied by people with local connection in perpetuity.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b)); 3. Plan-making: Strategic policies (para. 20(a)); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 5. Delivering a sufficient supply of homes (para. 59, 61-64); 5. Delivering a sufficient supply of homes: Identifying land for homes (para. 71(a)); 5. Delivering a sufficient supply of homes: Rural housing (para. 77);

#### Recommendation

Policy requires no modification. The 2019 NPPF advises that affordable housing should not be sought for residential developments of 9 dwellings or below, other than in designated rural areas where a lower threshold of 5 units or fewer can be set by policy. The glossary for the NPPF explains that ‘designated rural areas’ are National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985. The parishes in Gravesham are Designated Rural Areas and so the policy is in conformity. \* The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997 lists Cobham, Luddesdown and Shorne \* The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas) Order 1999 lists Higham and Meopham Problem – Vigo and Istead Rise

### CS17: Provision of Traveller Sites

#### Policy Overview

Meets housing needs of Travellers by: Safeguarding traveller sites with permanent permission; Investigating opportunities to extend existing permanent urban area sites; Supporting new urban area sites/rural settlement sites inset from Green Belt subject to plan policies.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b)); 3. Plan-making: Strategic policies (para. 20(a)); 5. Delivering a sufficient supply of homes (para. 59 and 61).

#### Recommendation

Policy requires no modification.

### CS18: Climate Change

#### Policy Overview

Flood Risk: development directed sequentially to areas at least risk of flooding. Proposals at risk of flooding must be accompanied by Flood Risk Assessment and Flood Risk Management Plan (if required). Permission refused if sequential and exception tests fail. Prioritise maintenance, improvement or replacement of flood defence infrastructure over other land uses. New development to reduce the causes and impacts of flooding. Water Quality: regard to Water Framework Directive and Thames River Basin Management Plan objectives. Sustainable Drainage and Surface Water Run-Off: ● surface water run-off from new development no greater impact than existing use; and \* use of Sustainable Drainage Systems. Water Demand Management: Manage supply of water and reduce impact of development on water supply: \* Require new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption) or by compensatory water savings. \* Seek 5% of homes on Key Sites to meet level 5/6 of the Code for Sustainable Homes ref. water use (80 litres/person/day consumption); \* Require all nonresidential developments of 1,000 m2 and above to meet the BREEAM "excellent" standards of water efficiency and include collection of rainwater; and \* Support retrofitting existing residential properties to reduce water consumption. Carbon Reduction: reduce carbon footprint of Borough by: \* national policy on transition to zero carbon development via amendments to Part L of the Building Regulations, require development to include low carbon and renewable energy generation inc. combined heat and power unless not technically or financially feasible or are alternative solutions; \* Support stand-alone decentralised, renewable or low carbon energy development; and \* Support other proposals which lead to a reduction in carbon footprint e.g. retrofitting existing homes.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 3. Plan-making: Strategic policies (para. 20(b) and 20(d)); 3. Plan-making: Development contributions (para. 34); 4. Decision-making: Preapplication engagement and front-loading (para. 41); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148); 14. Meeting the challenge of climate change, flooding and coastal change: Planning for climate change (para. 149-154); 14. Meeting the challenge of climate change, flooding and coastal change: Planning and flood risk (para. 155-165).

#### Recommendation

Policy requires no modification.

### CS19: Development and Design Principles

#### Policy Overview

New development: visually attractive, fit for purpose, locally distinctive, conserve and enhance character of built, historic and natural environment, integrate with local area and meet anti-crime standards. Incorporates sustainable construction standards and techniques, be adaptable, climate change resilient all through specific criteria inc. Building for Life 12, Kent Design, analysis of local context and character, Residential Layout Guidelines.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 3. Plan-making: Strategic policies (para. 20); 8. Promoting healthy and safe communities (para. 91 and 92(a)); 8. Promoting healthy and safe communities: Open space and recreation (para. 96); 9. Promoting sustainable transport (para. 102(c) and 102(e), 103, 104(a), 104(b), 104(d), 105 and 106); 9. Promoting sustainable transport: Considering development proposals (para. 108(a), 108(b) and 110); 12. Achieving well-designed places (para. 124-130); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148); 14. Meeting the challenge of climate change, flooding and coastal change: Planning for climate change (para. 149, 150, 151(c) and 153); 14. Meeting the challenge of climate change, flooding and coastal change: Planning and flood risk (para. 155, 163 and 165); 15. Conserving and enhancing the natural environment (para. 170(a), 170(d), 170(e) and 170(f)); 15. Conserving and enhancing the natural environment: Habitats and biodiversity (para. 174(b)), 175 and 177); 15. Conserving and enhancing the natural environment: Ground conditions and pollution (para. 178, and 180-182).

#### Recommendation

Policy generally conforms with the NPPF, however the 2019 NPPF sets out that Local Planning Authorities can make use of national describe space standards where their use can be justified. Whilst CS19 refers to local standards, the NPPF is a material consideration in decision taking, therefore no modification is needed.

### CS20: Heritage and the Historic Environment

#### Policy Overview

Preserves, protects, enhances heritage and historic environment especially heritage assets most at risk through neglect, decay, other threats. Secures viable, sustainable and appropriate futures for such assets at risk. Supports proposals and initiatives which preserve and enhance heritage assets, their setting where it contributes to the significance of the asset, interpretation and enjoyment. For development impact on designated heritage asset, weight given to its conservation value will be commensurate with importance and significance of asset. If non-designated assets, decisions regard to harm or loss and significance of asset.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 3. Plan-making: Strategic policies (para. 20(d)); 16. Conserving and enhancing the historic environment (para. 184 and 185; 16. Conserving and enhancing the historic environment: Proposals affecting heritage assets (para. 189, 190 and 192); 16. Conserving and enhancing the historic environment: Considering potential impacts (para. 193-197 and 200).

#### Recommendation

Policy requires no modification.

**Local Plan First Review Saved Policies**

**Housing**

**H5 - Increasing the Housing Stock by Conversion**

#### Policy Overview

Conversion of existing properties to flats, maisonettes, bedsit, hostels, homes and other forms of multiple occupancy is subject to criteria: (i) Building shall be in an appropriate area for conversion excluding an area comprised mostly single family dwellings and in areas which are environmentally unsuitable for young families e.g. have a predominance of HMOs. (ii) Building's size and arrangement unsuitable for single family occupation. (iii) Subject to Residential Layout Guidelines. (iv) Subject to adopted Vehicle Parking Standards

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 5. Delivering a sufficient supply of homes (para. 59 and 61) 9. Promoting sustainable transport (para. 102(e), 105 and 106); 9. Promoting sustainable transport: Considering development proposals (para. 110(b));12. Achieving well-designed places (para. 127(a), 127(c) and 127(f)); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148); 15. Conserving and enhancing the natural environment: Ground conditions and pollution (para. 180(a)).

#### Recommendation

Policy generally conforms with the NPPF, however the 2019 NPPF sets out that Local Planning Authorities can make use of national describe space standards where their use can be justified. Whilst CS19 refers to local standards, the NPPF is a material consideration in decision taking, therefore no modification is needed.

**H6(iii) - Provision to Meet Special Housing Needs**

#### Policy Overview

Prevents clustering together of residential hostels and homes (new build or conversion )to ensure area's character isn't harmed.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 5. Delivering a sufficient supply of homes (para. 59 and 61); 12. Achieving well-designed places (para. 127(a) and 127(c)); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148).

#### Recommendation

Policy requires no modification.

**Employment**

**E5 - Change of Use to Offices**

#### Policy Overview

Sets out specific areas on Proposals Map where change of use to offices will normally be permitted provided building fabric and townscape quality are maintained and B1 uses restricted to offices.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a) and 8(c)); 6. Building a strong, competitive economy (para. 80, 81(b), 81(c) and 82); 12. Achieving well-designed places (para. 127(a)-127(d)).

#### Recommendation

Policy requires no modification.

**Shopping**

**S3 - Maintenance of Shopping Frontages**

#### Policy Overview

Sets out shopping street frontages on Proposals Map where changes of use to uses other than shopping A1 will be resisted.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a)); 7. Ensuring the vitality of town centres (para. 85).

#### Recommendation

Policy requires no modification.

**S4 - Non-shopping Uses in the Shopping Areas**

#### Policy Overview

Sets out shopping street frontages on Proposals Map where changes of use to uses which are appropriate to Town Centre Shopping Area and require a shop window frontage, including A2 uses are allowed, provided total number in each street is not excessive.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a)); 7. Ensuring the vitality of town centres (para. 85).

#### Recommendation

Policy requires no modification.

**S7 - Hot Food Shops and Restaurants and other A3 Uses**

#### Policy Overview

Requires change of use of retail shops to A3 to meet specific criteria: (i) should not cluster to prevent dead frontage; (ii) not have detrimental effect on residential amenity; (iii) should be adequate parking; (iv) ventilation trunking discreetly located on building.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a)-8(c)); 7. Ensuring the vitality of town centres (para. 85); 9. Promoting sustainable transport (para. 102(e), 105 and 106); 12. Achieving well-designed places (para. 127(f)); 15. Conserving and enhancing the natural environment: Ground conditions and pollution (para. 180(a)).

#### Recommendation

Policy requires no modification.

**Townscape, Conservation and Design**

**TC2 - Listed Buildings**

#### Policy Overview

Demolition of listed buildings not granted unless substantial and overriding reasons apply. Following any demolition, early and appropriate redevelopment to follow. For alterations or extensions to listed buildings or setting, integrity of listed building to be maintained and sympathetic ref. massing, scale, appearance and materials. Change of use of listed buildings considered on merits especially if character or appearance of listed building will suffer.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 16. Conserving and enhancing the historic environment (para. 184 and 185);16. Conserving and enhancing the historic environment: Considering potential impacts (para. 194).

#### Recommendation

Policy requires no modification.

**TC3 - Development Affecting Conservation Areas**

#### Policy Overview

Development within or affecting a conservation area expected to make a positive contribution to conservation area. Demolition of unlisted buildings within or affecting conservation areas will be resisted unless building harmful to conservation area and redevelopment or other use beneficial.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 16. Conserving and enhancing the historic environment (para. 184 and 185); 16. Conserving and enhancing the historic environment: Proposals affecting heritage assets (para. 189, 190 and 192); 16. Conserving and enhancing the historic environment: Considering potential impacts (para. 193-196, 198, 200 and 201).

#### Recommendation

Policy requires no modification.

**TC7 - Other Archaeological Sites**

#### Policy Overview

Development on important archaeological sites not normally permitted. On less important archaeological sites permission refused unless archaeological investigation approved by the Council takes place in advance of or during development.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 16. Conserving and enhancing the historic environment (para. 184 and 185); 16. Conserving and enhancing the historic environment: Proposals affecting heritage assets (para. 189, 190 and 192); 16. Conserving and enhancing the historic environment: Considering potential impacts (para. 193-197).

#### Recommendation

Policy requires no modification.

**TC8 - Advertisement Control**

#### Policy Overview

Council’s policy guidelines for advertisement control used to determine advertisement consent applications. Displays detrimental to public safety or amenity resisted.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 12. Achieving well-designed places (para. 124, 125, 126 and 132).

#### Recommendation

Policy requires no modification.

**TC9 - Shopfronts**

#### Policy Overview

Resists loss of existing shopfronts of traditional design and materials. Installation of security grills and shutters on shopfront exteriors resisted.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 12. Achieving well-designed places (para. 124 , 125, 126, 127 and 130).

#### Recommendation

Policy requires no modification.

**The Countryside**

**C11 - Change of Use of Redundant Buildings in the Countryside**

#### Policy Overview

Conversion of farm buildings to other uses permitted where (i) originally erected as agricultural building but now no longer needed (ii) building is substantial, of permanent construction and in appropriate location ref. roads and services (iii) building has intrinsic interest or characteristic of Kent Countryside and alterations preserve that interest (iv) rural economy diversified and not dilute farm viability (v) curtilage is minimum necessary (vi) nature and intensity not detrimental to amenity or traffic safety.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a) and 8(c)); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 146(d)).

#### Recommendation

Policy requires no modification.

**C12 - Replacement Dwellings**

#### Policy Overview

Strong presumption against replacement of existing dwellings, only set aside subject to following criteria: (i) existing dwelling must be original dwelling in permanent dwelling use (ii) existing dwelling must be in appropriate location ref. roads, services, established rural settlement (iii) replacement dwelling must be of similar scale and mass to existing dwelling and no larger than existing dwelling subject to exceptions (iv) internal layout of replacement dwelling must prevent later subdivision (v) replacement dwelling occupies same site as existing dwelling (vi) satisfactory access (vii) site drainage, soil and waste disposal must be satisfactory.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 145(d)).

#### Recommendation

Policy requires no modification.

**C13 - Extensions to Dwellings**

#### Policy Overview

Dwelling extensions considered on merits subject to criteria: (i) must be “original dwelling” in permanent dwelling use (ii) limited to one third of gross floor area of original dwelling (iii) extensions for missing or inadequate basic amenities permitted (iv) does not facilitate formation of separate residential curtilage (v) must not lead to undue visual intrusion into open countryside (vi) appearance, massing, scale, form and materials shall be appropriate (vii) garages and outbuildings considered on merits.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 145(c)).

#### Recommendation

Policy partly conforms with the NPPF. In line with the NPPF, the policy allows extensions in the countryside but these are limited to extensions to dwellings whereas the NPPF refers to buildings. The NPPF also does not require the building to be in permanent use where the policy does. Criterion (ii) provides an indication of what is considered to be a proportionate extension i.e. no more than one third of the gross floor area of the original dwelling. When assessing whether a proposed extension is a disproportionate addition to the original building, consideration is also given to other factors including the footprint, volume and height of the proposed addition/extension in relation to those of the original building would come into play. Only limited weight can be given to criterion (iii) if it results in disproportionate additions over and above the size of the original building. The provision of extensions to provide essential basic amenities may be taken into account as a “very special circumstance.” No weight can be given to criterion (vii) as the erection of outbuildings (including domestic garages) is not one of the exceptions listed in paragraphs 145 or 146 of the NPPF. Therefore, they are inappropriate development in the Green Belt.

**C17 - Horse-riding and Stables**

#### Policy Overview

Proposals for horse-riding, riding schools and stables only permitted if compatible with agricultural, landscape and transport policies in this Plan and be properly designed, of sound materials appropriate to countryside and in acceptable location.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 145(b) and 146(e)).

#### Recommendation

Policy requires no modification.

**C18 - Incorporation of Additional Land into Residential Gardens**

#### Policy Overview

Resists incorporation of productive or potentially productive farmland and woodlands into residential gardens.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(c)); 13. Protecting Green Belt land: Proposals affecting the Green Belt (para. 143 and 144); 15. Conserving and enhancing the natural environment (para. 170 and 172).

#### Recommendation

Policy requires no modification.

**Leisure and tourism**

**LT6 - Additional Open Space in New Housing Development**

#### Policy Overview

Housing development to make provision for appropriate open space and play space ref. scale and type of housing proposed and existing provision.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 83(d)); 8. Promoting healthy and safe communities (para. 92(a)); 8. Promoting healthy and safe communities: Open space and recreation (para. 96); 11. Making effective use of land (para. 121(b)).

#### Recommendation

Policy requires no modification.

**Transport**

**T1 - Impact of Development on the Highway Network**

#### Policy Overview

Considers traffic impact of development on transport system and ensures all developments are adequately served by highway network.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport (para. 102); 9. Promoting sustainable transport: Considering development proposals (para. 108-111).

#### Recommendation

Policy requires no modification.

**T2 - Channelling of Traffic onto the Primary and District Distributor Network**

#### Policy Overview

Seeks to channel traffic travelling through Gravesham on to primary road network and traffic between and within residential, industrial, principal business districts onto district distributors.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport (para. 104(b) and 104(c)).

#### Recommendation

Policy requires no modification.

**T3 - Development not well related to the Primary and District Distributor Network**

#### Policy Overview

Development generating significant volumes of commercial traffic, not permitted if not well related to primary and district distributor network.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport: Considering development proposals (para. 109).

#### Recommendation

Policy requires no modification.

**T4 - Development outside the Built-Up Area**

#### Policy Overview

The Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built up area that generates significant vehicular or pedestrian traffic.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 6. Building a strong, competitive economy: Supporting a prosperous rural economy (para. 84); 9. Promoting sustainable transport: Considering development proposals (para. 109).

#### Recommendation

Policy requires no modification.

**T5 - New Accesses onto Highway Network**

#### Policy Overview

Formation of new accesses or intensification of existing accesses onto highway network not permitted, except if no danger arises, properly formed access created and to acceptable standard.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport: Considering development proposals (para. 108(b)) and 110(d)).

#### Recommendation

Policy requires no modification.

**T6 - Safeguarding of Thameside Development Route**

#### Policy Overview

Safeguards STDR. Resists development which prevents or impedes implementation of STDR.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport (para. 104(b) and 104(c)).

#### Recommendation

Policy requires no modification.

**T9 - Housing Estate Layout**

#### Policy Overview

Highway layout of new residential developments to comply with Kent Design Guide and Vehicle Parking Standards and use “Traffic Calming” measures.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(b) and 8(c)); 8. Promoting healthy and safe communities (para. 91); 9. Promoting sustainable transport (para. 102(e), 105 and 106); 9. Promoting sustainable transport: Considering development proposals (para. 108(a), 108(b) and 110; 12. Achieving well-designed places (para. 124-127 and 130).

#### Recommendation

Policy requires no modification.

**Parking**

**P3 - Vehicle Parking Standards**

#### Policy Overview

Development to provide parking on site, in accordance with KCC Vehicle Parking Standards, as interpreted by GBC, unless exception justified. B1 car parking at offices standard, lorry parking and manoeuvring areas provided, unless restriction agreement entered into.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport (para. 102(e), 105 and 106).

#### Recommendation

Policy requires no modification.

**P5 - Change of Use of Buildings and Vehicle Parking Standards**

#### Policy Overview

For c/o/u, conversion of dwellings, minor extensions, ensures Vehicle Parking Standards are met. If prejudicial to townscape or lead to unused/underused building, may relax standards, provided doesn’t exacerbate on-street parking problems.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 9. Promoting sustainable transport (para. 102(e), 105 and 106).

#### Recommendation

Policy requires no modification.

**Area Policies**

**AP1 - Wrotham Road, Gravesend**

#### Policy Overview

Sets out policy approach for Wrotham Road area on Proposals Map. Prevents conversion of dwellings to commercial. Supports broad mix of housing and commercial uses or community facilities. If re-use of Wrotham Road School arises will be restricted to low traffic-generating use e.g. community facilities/sheltered housing.

#### Conformity with NPPF 2019 Ministerial Statements

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 5. Delivering a sufficient supply of homes (para. 59 and 61); 8. Promoting healthy and safe communities (para. 91(a), 92(a) and 92(e)); 9. Promoting sustainable transport (para. 104(a)); 11. Making effective use of land (para. 118(a)); 12. Achieving well-designed places (para. 127(e) and 127(f)).

#### Recommendation

Policy requires no modification.

**AP2 - Parrock Street, Gravesend**

#### Policy Overview

Sets out policy approach for Parrock Street area on Proposals Map. Supports small low overhead premises for shops and non-office services. Offices acceptable on upper floors only.

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 7. Ensuring the vitality of town centres (para. 85(d)); 8. Promoting healthy and safe communities (para. 91(a), 91(c), 92(a), 92(c), 92(d) and 92(e)); 9. Promoting sustainable transport (para. 104(a)); 11. Making effective use of land (para. 118(a)); 12. Achieving well-designed places (para. 127(e)).

#### Recommendation

Policy requires no modification.

**AP7 - Milton Road, Gravesend**

#### Policy Overview

Sets out policy approach for Milton Road area on Proposals Map. Maintains flexible attitude to proposals, particularly if shopping no longer viable. Non-office services and offices requiring “shop window” frontage acceptable.

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c));7. Ensuring the vitality of town centres (para. 85(d)); 8. Promoting healthy and safe communities (para. 91(a), 92(a), and 92(e)); 9. Promoting sustainable transport (para. 104(a)); 11. Making effective use of land (para. 118(a)); 12. Achieving well-designed places (para. 127(e)).

#### Recommendation

Policy requires no modification.

**AP10 - Harmer Street, Gravesend**

#### Policy Overview

Sets out policy approach for Harmer Street area on Proposals Map. Ensures conservation, restoration and continued use of buildings. Mix of commercial uses (offices/small retail units) appropriate. Residential conversions welcomed provided compliant with Residential Layout Guidelines.

2. Achieving sustainable development (para. 8(a), 8(b) and 8(c)); 5. Delivering a sufficient supply of homes (para. 59); 7. Ensuring the vitality of town centres (para. 85(d));8. Promoting healthy and safe communities (para. 91(a), 92(a), and 92(e)); 9. Promoting sustainable transport (para. 104(a)); 11. Making effective use of land (para. 118(a)); 12. Achieving well-designed places (para. 127(e) and 127(f)); 14. Meeting the challenge of climate change, flooding and coastal change (para. 148); 16. Conserving and enhancing the historic environment: (para. 184 and 192).

#### Recommendation

Policy requires no modification.