



Delegated Report

Full Planning Application

Planning Application No: 20230891

Location: Rear And Side Of Bridewell Watling Street Gravesend Kent

Description: Erection of 3no. dwellings comprising of a pair of semi-detached houses and a detached house to provide family homes with parking and gardens.

Applicant: Mr And Mrs David And Denise McCormick

Site Visit Date: 5th September 2023

Submitted Documents/Plans

Planning Application Form;
Site Location Plan;
Drawing No. 75 – Existing Block Plan;
Drawing No. 76 – Existing Site Layout Plan;
Drawing No. 100 – Proposed Block Plan;
Drawing No. 101 – Proposed Site Layout Plan;
Drawing No. 102 – Proposed Plans and Elevations – Detached House;
Drawing No 103 – Proposed Plans and Elevations – Semi-Detached Houses;
Drawing No. 300 – Proposed Street Scene Elevations;
Drawing No. 301 – Existing Street Scene Elevations; and
Design & Access Statement.

Relevant Recent Planning History

Reference	Description	Decision	Decision Date
19900172	Erection of two storey side extension linking to the existing garage to form dining room, utility room and w.c. with bathroom, bedroom and ensuite shower/w.c. over.	Permitted	23.04.1990
TH/2/49/298A 19490707	Erection of two police houses with detached garages and an office	Permitted	28.06.1951
TH/2/49/298 19490706	Erection of two police houses with office and garages	Permitted	06.03.1950

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Courts have held that it is a matter of planning judgement as to whether a proposal is in accordance with the development plan when 'read as a whole' and conflict with a particular policy or policies may not pass that threshold.

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.

In this instance the Development Plan for Gravesham currently comprises: -

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

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Design & Development Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- T5 – New Access onto Highway Network

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- 2 – Achieving Sustainable Development
- 12 – Achieving sustainable development and well-designed places
- 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015); and
- SPG 4 - KCC Parking Standards (2006).

Consultations, Publicity and Representations

Consultees

External

KCC – Heritage Conservation

No comments received.

Internal

Environmental Protection Services

No objection to this application, but the following is recommended:

Code of Practice on Construction and Demolition: Please apply as appropriate to minimise the impact of the construction on nearby residential premises.

Smoke Control Informative: The proposed development is situated in a smoke control area. As such, only authorised smokeless fuels as listed in the Smoke Control Areas (Authorised Fuels) Regulations 1991 shall be burnt or fireplaces/appliances exempted by Smoke Control (Exempted Fireplaces) Orders shall be utilised. Exempt appliances are appliances (ovens including pizza and tandoori ovens, wood burners and stoves) which have been exempted by Statutory Instruments (Orders) under the Clean Air Act 1993. These have passed tests to confirm that they are capable of burning an unauthorised or inherently smoky solid fuel without emitting smoke. They must be fitted and used according to manufacturer's instructions and they can only be used for the fuel for which they are designed. When purchasing fuels and fireplaces the applicant should clarify with the vendor their suitability with respect to use in Smoke Control Areas. For further information, including confirmation that an appliance and/or fuel is suitable for use in a smoke control area, the applicant should contact the Council's Regulatory Services air.quality@gravesham.gov.uk

Drainage/sewerage informative: The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable.

Highways Officer

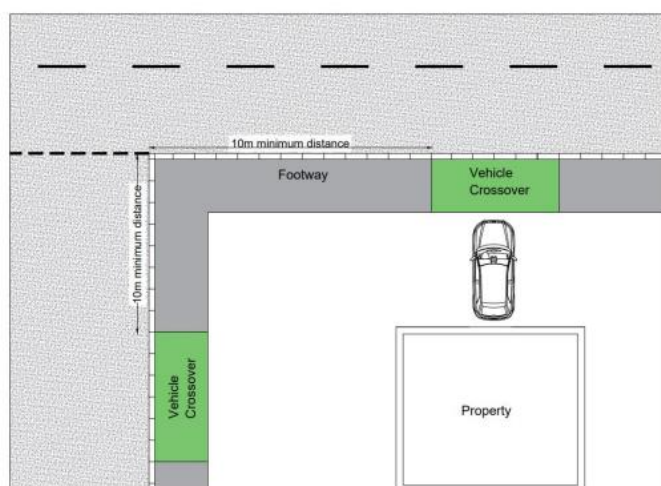
The Design and Access Statement has errors in it, whilst not necessarily fatal demonstrate that due care has not been applied when compiling the documents.

Transport: Access to the site 05.04, reference is made to international rail links between Ebbsfleet International Station and Europe. During the Covid pandemic, these services were withdrawn and currently the only international station operating in the UK is St Pancras International, although it is suggested that international services may return by 2026 at the latest.

On the following page 05.05 it states the nearest Hospital is Darent Valley Hospital which is accessible via the A26 or A20, neither road is in the immediate area. The A226 and A2 being more appropriate, although the A226 is closed until the issues at Galley Hill can be resolved, there is a route available using the roads around Ebbsfleet and Swanscombe that avoid the A2.

In terms of the car parking layout, the County Council in their carriage crossover guidance requires a separation between a junction and an access of at least some 10 metres, this does not appear to have been achieved here.

Diagram: Distance to Road Junction



Residential Dropped Kerb Guidance and Self-Assessment v9

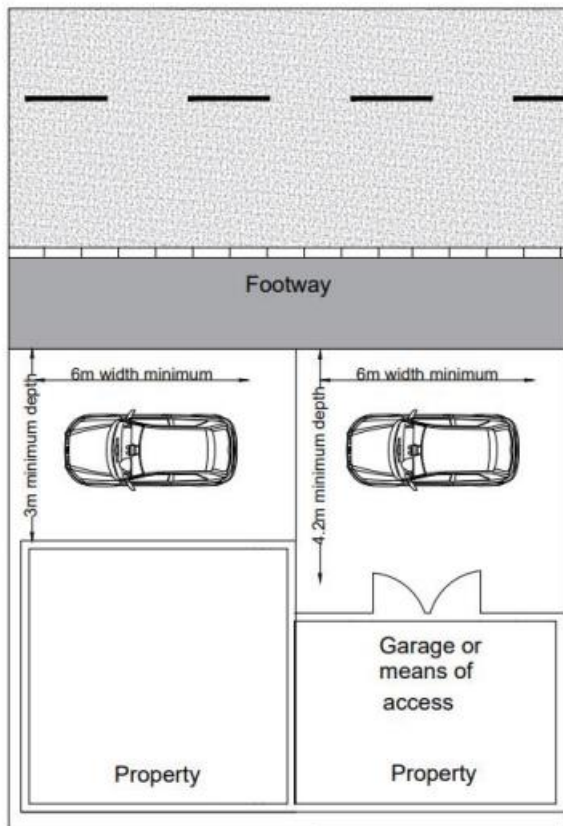
www.kent.gov.uk May 2023

https://www.kent.gov.uk/_data/assets/pdf_file/0003/139485/Dropped-Kerb-Application-Guidance.pdf

Kent County Council's supplementary planning guidance SPG4 adopted by Gravesham Council, require parking spaces to be 2.5 metres wide (increasing to 2.7 metres when adjacent to an enclosing boundary) and 5 metres deep. I would prefer dimensioned plans as when scaling I am getting variable measurements some of which comply and others that do not. For the semi-detached properties the expectation would be a 6 metre wide access aisle and it would appear the proposal is slightly less, so again a dimensioned drawing would demonstrate compliance with guidance.

Pedestrian visibility splays of 2m x 2m should be provided either side of an access, and care must be made when positioning vehicles when parked parallel to the carriageway, the depth requirements of the carriage crossover guidance issued by KCC would suggest only a single vehicle could be safely accommodated in front of each house and not the two shown.

Diagram C & D: Parallel Parking:



Residential Dropped Kerb Guidance and Self-Assessment v9

www.kent.gov.uk May 2023

The proposal would appear to be an overdevelopment of the site and it is more suited for two dwellings.

Pending revised drawings, it appears the current design may not comply with guidance and there are limitations on the possibility of providing suitable pedestrian visibility splays particularly in the case of the 4-bedroom property and the view to the east across the neighbouring front garden. The access for the pair of semi-detached properties appears to be too close to the junction with Orchard Avenue to get the Highway Authorities approval to be constructed, given their guidance. The recommendation based on the submitted drawings would be one of refusal.

GBC - Waste and Recycling Manager

I have reviewed the above planning application and I am happy with the refuse and recycling provision within the application.

Neighbouring properties

10 surrounding properties were consulted and a site notice displayed on site which expired on 29th September 2023. No comments were received.

Officer's Analysis

Housing Need and the Principle of Development

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

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

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

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

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

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

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

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

The proposed development for a net increase of '3' dwellings would offer a minimal contribution towards meeting local housing need and, accordingly, officers consider that this should be accorded minimal weight in support of the application.

Paragraphs 130 and 134 of the NPPF (2023) require development to add to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the NPPF (2023)) and established local planning policy taken as a whole.

Design, Character and Appearance

When considering the design of this proposal, it needs to be considered against the relevant local and national planning policy. Policy CS15 (LPCS) states that sites will be developed at a variety of densities depending on the sites location and accessibility to public transport. Furthermore, development needs to be delivered at a density that achieves good design and does not compromise the character of the area.

Policy CS19 (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 NPPF (2023) sets out that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

The application site is to the rear and side of the property Bridewell on Watling Street, which historically were two police houses. The site benefits from being a large corner plot and has frontages onto Golf Links Avenue to the west and Orchard Avenue to the north. The north of the site is bounded by mature hedging that extends the length of north boundary to the corner with Golf Links Avenue and also benefits from mature trees and planting within the site, which has a positive contribution to the streetscene and visual amenity of the area.

The surrounding area is residential in character with various property designs. Watling Street consists of larger detached properties, whilst Golf Links Avenue and Orchard Avenue has a mixture of terrace, semi-detached and detached dwellings of both single and two storey design.

Application Site



Surrounding Area

Golf Links Avenue

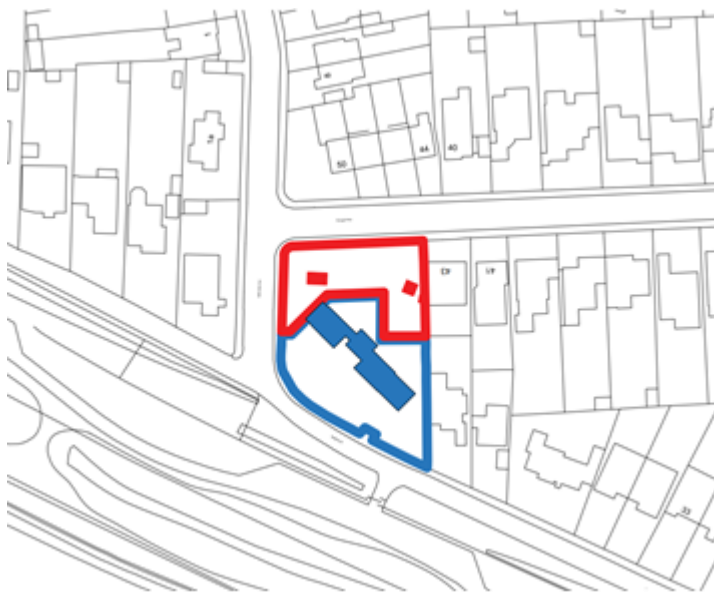


Orchard Avenue



The spatial layout of the area has uniformity, with properties being set generously back from the footpath with a clear building line along Orchard Avenue, and the majority of properties benefiting from generous

gardens to the rear. The corner plots are also set in from the boundaries, given a more open and spacious character.



The proposal is for the erection of 3no. dwellings comprising of a pair of semi-detached houses and a detached house to provide family homes with parking and gardens, which would develop the majority of the rear garden of the host dwelling.

Existing Site Layout



Proposed Site Layout

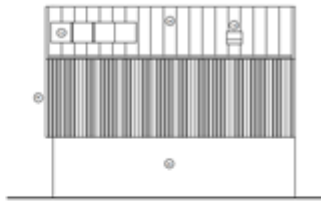


Semi-Detached Pair

FRONT ELEVATION



RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



Detached Dwelling

FRONT ELEVATION



RIGHT ELEVATION



REAR ELEVATION



LEFT ELEVATION



In terms of the principle of development, the rear garden of Bridewell is extensive and larger than the surrounding properties and therefore the principle of residential development is acceptable providing it accords with the local and national policies below.

Policy CS15 (LPCS) 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. The site has an area of 630.78m² (0.063 hectares). The proposed density of the application site would be 47.61 per hectare, which is higher than the surrounding area.

Looking at the spatial layout of the surrounding area in terms of the properties and rear gardens, there is a uniformity, with properties benefiting from generous plots, being set back from the road. The

arrangement of the properties and gardens does not reflect the spatial layout of the surrounding area or the established building line along Orchard Avenue. As such, the proposals would be out of character with the area, introducing a cramped form of development and supports the concern that the proposals are out of character with the area and constitute overdevelopment.

In terms of property design, on Orchard Avenue there is a row of two storey terrace properties opposite the site and to the east are detached bungalows of similar design and layout. Materials are mainly brick with tile hung frontages with some examples of gable cladding.

The proposed properties introduce a more contemporary design which have a higher ridge height than the surrounding properties and do not reflect layout or design of the surrounding area, as can be seen from the following proposed streetview images:



In addition, the blank side dormer of the detached dwelling, adds a bulky and unattractive addition to the roofslope.

Overall, and taking into consideration the above, the proposals are considered to constitute an overdevelopment of rear garden which would result in a comparatively cramped form of development and would be incongruous considering the existing pattern of development and the character of the properties and residential gardens which comprise the area. It is therefore harmful to the character and appearance of the site and the wider locality and would contravene Policies CS15 and CS19 (LPCS) which ensure new development will integrate well with the surrounding local area.

At national level the proposed development would also contravene paragraph 130 of the NPPF (2023) which states that development will function well and add to the overall quality of the area, be visually attractive as a result of good architecture, layout and appropriate and effective landscaping, and are sympathetic to local character.

Amenity of Future Occupiers

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, will accord with the adopted Residential Layout Guidelines'. On 25 March 2015, the Government issued a written ministerial statement which introduced new technical housing standards in England.

The proposed semi-detached pair comprising of two storey 3 bedroom, 4 person properties would have a gross internal floor area of 98m², which would exceed the 84m² minimum of the national standards. The detached 4 bedroom, 7 person property laid out of over three floors would have a gross internal floor area of 168.06m², which would exceed the 121m² minimum of the national standards. All habitable rooms would be of a good size with access to adequate natural light and outlook.

The Gravesham Residential Layout Guidelines (2020) has a minimum garden area of 60m² for a 3 bedroom and 100m² for a 4+ bedroom property and a minimum depth of 10m. The garden area of Plot 1 has an area of 46.11m², and Plot 2 has an area of 54.23m², and as such both properties fall short of the minimum garden area for a 3 bedroom property by 13.89m² and 5.77m² respectively. Plot 3 has a garden area of 80.5m², which falls short of the minimum area for a 4 bedroom property by 19.5m². In addition, all of the gardens fall short of the 10m minimum depth by more than 2m.

In terms of privacy, all applications for new dwellings will be expected to comply with the Borough Council's privacy distances. Plot 3 has rear facing windows on all three levels which would only have a distance of 20.66m from the central point of the property to the rear elevation of Bridewell and would fall short of the 26m minimum.

As such, the private amenity areas for all three units, and the minimum distance between habitable room windows fall short of the minimum and are contrary to the guidance laid out the Gravesham Residential Layout Guidelines (2020).

It is therefore considered that in terms of occupier amenity, the proposal would be contrary to the objectives of Policy CS19 (LPCS) and para. 130f of the NPPF (2023).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land, with paragraph 130 of the NPPF (2023) requiring development to have a high standard of amenity for existing users (in this case surrounding properties).

As a result of the proposed development, the resultant rear garden of the existing property Bridewell would be 253m². This would accord with the minimum of 100m for a 4+ bedroom property, but would overall fall short of the 10m minimum depth. Furthermore, the irregular shape would make some of the areas difficult to use.

As laid out above in the occupier amenity section, Plot 3 has rear facing windows on all three levels which would only have a distance of 20.66m from the central point of the property to the rear elevation of Bridewell and would fall short of the 26m minimum. Therefore the proposal would have the potential to result in a loss of privacy to the occupiers of Bridewell when in their rear facing rooms and in the private amenity area.

In addition, the layout and proximity of Plot 1 and 2 would be such that with a distance of only approximately 6m between the rear of Bridewell and the blank side elevation of Plot 1, would result in a loss of visual amenity from the rear facing windows and would have a overbearing impact.

Overall and taking all of the above into consideration, the proposed development would result in a

detrimental impact on neighbour amenity and would result in a substandard garden, overbearing impact and loss of privacy to the occupants of Bridewell. The development would therefore be contrary to Policy CS19 (LPCS) and para. 130f of the NPPF (2023).

Highways

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

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

Plots 1 and 2 have two parking spaces which would accord with KCC parking standard, however Plot 3 only provides 2 spaces and the minimum requires 3.

In terms of access, the GBC Highways Officer comments are clear and that the parking layout may not comply with guidance and there are limitations on the possibility of providing suitable pedestrian visibility splays particularly in the case of the 4-bedroom property and the view to the east across the neighbouring front garden. The access for the pair of semi-detached properties appears to be too close to the junction with Orchard Avenue to get the Highway Authorities approval to be constructed, given their guidance. The recommendation based on the submitted drawings would be one of refusal.

Taking the above into consideration, the proposed parking and access provision for the development would be contrary to Policy CS11 (LPCS) and Saved Policy P3 (LPFR).

Refuse arrangements

The proposed bin stores are appropriate for the development and there is no objection in this regard.

Any Other Material Planning Considerations

Impact on Biodiversity

The application site forms part of the rear garden of Bridewell which benefits from a large area of laid to lawn, together with mature boundary hedging, trees, hedging and other soft landscaping and a pond within the site.

Section 15 of the NPPF (2023) states that developments should result in a biodiversity net gain.

The proposed development would result in the removal of a substantial amount of soft landscaping and whilst some soft landscaping has been incorporated within the proposals, this would not mitigate or overcome the substantial loss and therefore would result in a loss of biodiversity.

The proposal would therefore be contrary to Policy CS12 (LPCS) and Section 15 of the NPPF (2023).

Appropriate Assessment

The Habitats Directive protects certain species of plants and animals that are particularly vulnerable and requires a Habitats Regulations Assessment (HRA) to be undertaken by a competent public body, such as a

local planning authority where any development has the potential to have an impact on a European protected site. The process of HRA involves an initial 'Screening' stage followed by an Appropriate Assessment (AA) if proposals are likely to have a significant (adverse) impact on a protected site - in this case the Thames Estuary and Marshes Special Protection Area of SPA (termed Natura 2000 site).

In the light of any such assessment, the Borough Council may only grant planning permission if it has been ascertained that the proposed development will not, either on its own or in-combination with other plans and projects, have an Adverse Effect on the Integrity (AEOL) of such a site, unless there is no feasible alternative or imperative reasons of overriding public interest apply.

Recreational Pressures on the Thames Estuary and Marshes Special Protection Area (SPA) and SAMMS

The Thames Estuary and Marshes Special Protection Area (SPA) is 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 Local Planning Authority has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £314.05 per dwelling) where applicable. This approach is approved by Natural England for all new residential developments. For every planning application for a new dwelling (including new flats), the tariff contributions are secured through a Section 106 legal agreement or unilateral undertaking or if there are no other financial contributions this is secured through a contribution agreement. Where a developer is unwilling to make the SAMMS payment, sufficient evidence is required to be supplied to enable the Council to undertake an Appropriate Assessment to determine that it is unnecessary to mitigate any potential Likely Significant Effect.

The tariff has previously been accepted effectively in lieu of an Appropriate Assessment (AA). However, in a recent Court of Justice European Union (CJEU) ruling this approach was not considered to be valid, as the CJEU considered the first stage to 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. In this respect, the CJEU judgement made 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 Appropriate Assessment and that mitigation measures cannot be taken into account at the screening stage.

The applicants have made the contribution and therefore on this basis, the proposal is considered to comply with Paragraphs 180 and 181 of the NPPF (2023) and policy CS12 (LPCS), and the requirements of the Conservation of Habitats and Species Regulations 2017.

Final Balancing Exercise

It is acknowledged that the Council is currently unable to demonstrate a five-year housing supply and as the delivery of housing is substantially below (less than 75%) that required by the Housing Delivery Test,

the housing delivery element of Policy CS02 (LPCS) must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF (2023).

The proposed development for a net increase of 3no. dwelling units (in this case 3 houses) would offer a minimal contribution towards meeting this local need and delivery and, accordingly, adds some weight in support of the application.

However, notwithstanding this a balanced approach has to be taken and it is considered that the adverse impacts of the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF (2023) and established local policy taken as a whole.

In this case the balance is tilted towards refusal for the following reasons:

The proposals are considered to constitute an overdevelopment of the rear garden which would result in a comparatively cramped form of development and would be incongruous considering the existing pattern of development and the character of the area. It is therefore harmful to the character and appearance of the site and the wider locality and would contravene Policies CS15 and CS19 (LPCS) which ensure new development will integrate well with the surrounding local area. At national level the proposed development would also contravene paragraph 130 of the NPPF (2023) which states that development will function well and add to the overall quality of the area, be visually attractive as a result of good architecture, layout and appropriate and effective landscaping, and are sympathetic to local character.

The proposal would result in a detrimental impact on the amenities on both existing and potential new occupiers of Bridewell and the new properties in terms of loss of privacy, overbearing impact and substandard private amenity areas, contrary to the objectives of Policy CS19 (LPCS) and para. 130f of the NPPF (2023).

The proposed access, visibility and parking layout for Plots 1 and 2 and the provision for Plot 3 would not accord with the minimum parking standards and the Kent County Council's supplementary planning guidance SPG4 and as such the development would be contrary to Policy CS11 (LPCS) and Saved Policy P3 (LPFR).

The proposed development would result in the removal of a substantial amount of soft landscaping resulting in a biodiversity net loss. The proposal would therefore be contrary to Policy CS12 (LPCS) and Section 15 of the NPPF (2023).

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	17 th October 2023	Dated:	17th October 2023