
SUMMARY REPORT

Application Ref:	20240834
Site Address:	Anglo Saxons Friendly Society Anglo Saxons Hall 2 - 3 Berkley Road Gravesend
Application Description:	Change of use of former Anglo-Saxons Friendly Society offices and meeting space to 2 x 1 bed flats and 10 x 1 bed HMO. Demolition of existing rear single storey flat roofed extensions and removal of 2 storey rear external metal fire escape. Erection of new single storey rear extension, new traditionally detailed fenestration at front of building, new dormer extension to rear, and new cycle and bin stores.
Applicant:	Pineapple Properties
Agent:	Ms Clare Wright, C. B. Wright & Associates Ltd
Ward:	Town
Parish:	Non-Parish Area
Decision due date:	10 January 2025
Publicity expiry date:	1 November 2024
Decision Level:	Committee Decision
Reason for referral:	Councillor call-in
Recommendation:	Permitted

Summary of Reasons for Recommendations

The proposal would provide a minimal contribution towards increasing housing provision in the area, and subject to conditions, is considered to be acceptable in terms of the design and impact of the proposal on the application site and the character and appearance of the surrounding King Street Conservation Area, and with regards to residential amenity and highway matters.

MAIN REPORT

1. Site Description and Surroundings

- 1.1. The site lies in the urban area of Gravesend, and in terms of site designations it is within the Gravesend Town Centre Opportunity area and the King Street Conservation Area.
- 1.2. Berkley Road is recognised as being a self-contained late 19th century residential area with small, terraced houses, and as stated in the King Street Conservation Area Character Appraisal, one of the principal features of the conservation area in Berkley Road is the landmark Anglo Saxons Friendly Society buildings and large yard doors. The site is no longer used by the Anglo Saxons Friendly Society, and it is these now vacant buildings and land that comprise the application site.

- 1.3. The premises have been altered at times over the years (see below Planning History). The front of the buildings largely remain the same, with the exception of UPVC windows.
- 1.4. To the south of the site is the Post Office garage, which has a vehicular access running from Queen Street (to the west) to Berkley Road, coming out immediately adjacent the site frontage. To the north and opposite the site to the east are terraced residential dwellings. An industrial unit (Dolphin Yard) accessed from Queen Street lies immediately to the rear (west) of the site.

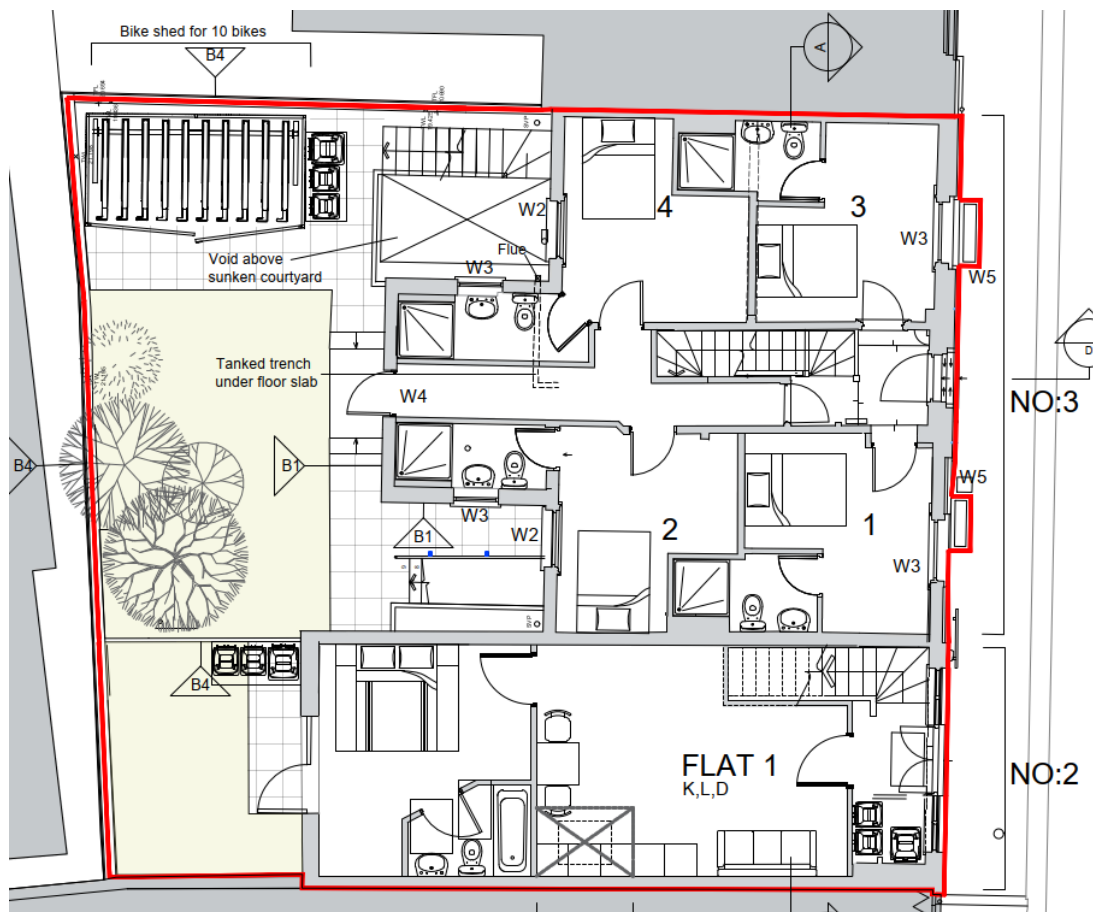
2. Relevant Planning History

Reference	Description	Decision	Decision Date
20191203	Change of use of hall to B1 use including demolition of the existing single storey rear extension. Change of use of the rest of the building from B1 office use to 1 no. three bedroom dwelling and 1 no. 2 bedroom dwelling, erection of a single storey rear extension, two dormer extensions in rear roof slope and alterations to the front and rear elevations.	Permitted	06.02.2020
20170619	Change of use of hall to B1 office use and change of use of the rest of the building from B1 office use to 2 no. three bedroom dwellings including demolition of the existing single storey rear extensions and erection of a single storey rear extension, a two storey rear extension, two dormer extensions in the rear roof slope, two roof lights in the front slope and alterations to the front and rear elevations of the building with the insertion of new window and door openings and alteration and replacement of existing windows and doors.	Refused Appeal Dismissed	20.12.2018 03.10.2019
20090735	Change of use of first floor from residential to office use.	Permitted	09.11.2009
20060926	Application for Conservation Area consent for demolition of the rear extension.	Permitted	30.01.2007
20060925	Erection of single storey rear extension to form a manager's office, wc accommodation and store, and installation of new automatic timber doors in the front elevation.	Permitted	30.01.2007

3. Proposal

- 3.1. This application seeks permission for the change of use of the former Anglo-Saxons Friendly Society offices (Use Class E) and meeting space to 2 x 1 bed flats and 10 x 1 bed House in Multiple Occupation (HMO). The proposal includes the demolition of existing rear single storey flat roofed extensions and the removal of a 2 storey rear external metal fire escape, and the erection of a new single storey rear extension, new traditionally detailed fenestration at the front of the building, a new dormer extension to the rear, and new cycle and bin stores.

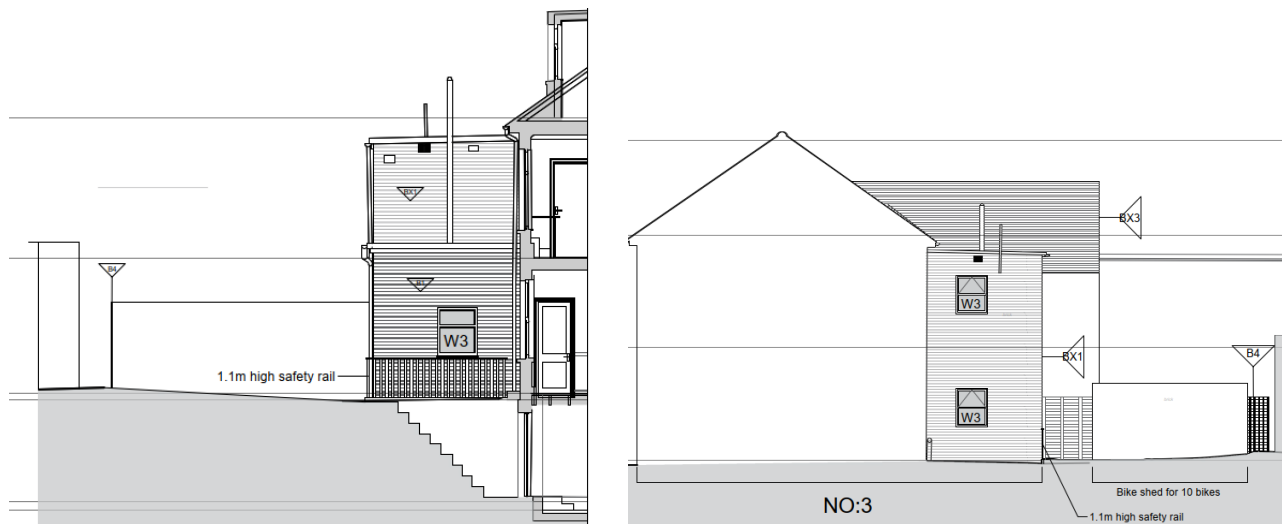
Proposed ground floor plan:



Proposed front and rear elevations



Proposed right and left elevations:



- 3.2. The proposed conversion to the HMO relates to the larger part of the building that makes up No. 3. The basement will contain a kitchen/breakfast area and living/dining room with a central staircase up to the ground floor, where there will be 4 bedrooms. The first floor would contain 4 further bedrooms, and the central staircase would continue to the second floor, where there would be 2 bedrooms in the roofspace. All the bedrooms will have ensuite shower rooms. There will be access out to a rear amenity space from the ground floor and via a sunken courtyard and existing steps accessed from the basement rooms.
- 3.3. No. 2 will be converted to 2 one bedroom flats on the ground and first floor, with an open plan kitchen/living room/dining space and a bedroom with an ensuite. The ground floor flat would have access to a rear amenity area via the bedroom at the rear. There would be an internal and an external bin store for the two flats.
- 3.4. There will be a bike shed for 10 bikes and a bin store in the rear amenity area for the HMO. There would be no off-street parking for the development.
- 3.5. Materials would include brick and render, with clay roof tiles to match the existing. There would be double glazed timber sliding sash windows to the front elevation and aluminium/UPVC windows and doors to the remainder

4. Planning Policy, Development Plan and other Material Considerations

- 4.1. 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;
 The Kent Minerals and Waste Local Plan 2013 - 2030 (July 2016, revised 2020).

- 4.2. The relevant policies for this proposal are as follows:

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 - Housing Type and Size

- CS15 - Housing Density
- CS18 – Climate Change
- CS19 – Design and Development Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- H6 (iii) – Provision to Meet Special Housing Needs
- TC3 – Development Affecting Conservation Areas
- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards
- P5 – Change of Use of Buildings and Vehicle Parking Standards

- 4.3. Paragraph 34 of the NPPF (2024) 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.
- 4.4. 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 (2024), the Council will also seek to replace these saved policies via the emerging Local Plan.

Other Material Considerations

National Planning Policy Framework (2024)

- 2 – Achieving sustainable development
- 5 – Delivering a sufficient supply of homes
- 6 – Building a strong, competitive economy
- 8 – Promoting healthy and safe communities
- 9 – Promoting sustainable transport
- 11 – Making effective use of land
- 12 – Achieving well-designed places
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG2 – Residential Layout Guidelines (2020)
- SPG4 – KCC Parking Standards (2006)
- Technical Housing Standards – Nationally Described Space Standards (2015)
- King Street Conservation Area Character Appraisal (2009)
- Management Plan – Gravesend Town Centre Conservation Areas (2009)
- Guidance for HMO Amenity Standards (2023)
- Design for Gravesham – Design Code SPD (2024)

- 4.5. Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

5. Consultations and Publicity Responses

External Consultees

Kent Police

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
2. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.
3. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
4. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states:
"18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided."
Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
5. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
6. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
7. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.

8. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.
9. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
10. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents within the flats.
11. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along with a freestanding post box of SBD/Sold Secure approved Gold standard. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the ground floor to prevent access to all areas.
12. CCTV is advised for all communal entry points and to cover the mail delivery area.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

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.

Internal Consultees

GBC Conservation Officer

I've reviewed the application and generally support the proposals. The reinstatement of timber sashed windows to the front elevation makes a positive contribution to the conservation area. I would recommend seeking the ground floor arched window has an arched upper sash to match the original seen at 17, 18 and 19, and ideally the glazing bar pattern for the ground and first floor windows at number 19 should be replicated.

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GBC Environmental Protection

There is no objection to this application.

A 'Sound Insulation Assessment' dated September 2024 by Able Acoustics (Report Ref: P1603) has been submitted and reviewed. The methodology and findings of the report are accepted. The report has worked to a criterion of partitions between habitable/HMO rooms being 5dB above Approved Document E (ADE) requirement and the partitions between the kitchen/living etc spaces (on the basement) and flats and HMO rooms above being 10dB above ADE requirements.

Based on this, the assessment indicates that the level of sound insulation of the various internal partitions is not to the required standard. The side wall to the adjacent garage area is of an acceptable level as is the partition wall between flats 1 and 2 and the HMO units. However, upgrading work will be required to the various floor/ceiling partitions across the 2 floors and between the HMO units themselves.

Upgrading works will therefore be needed to ensure compliance with the above criteria and a suitable specification is given in section 5.1.7 based on Floor Treatment 1 in the ADE). The report indicates that due to restricted ceiling height in the basement, alterations to the floor above may be needed in order to comply.

To address the above and other matters, the following conditions and informatives are recommended

Sound Insulation

The sound insulation measures as detailed in the 'Sound Insulation Assessment' dated September 2024 by Able Acoustics (Report Ref: P1603) (The Report) shall be implemented by competent persons.

No flat or HMO room shall be occupied until a post completion noise survey has been undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. The post completion testing shall assess performance of the sound insulation measures against the criteria as set out in The Report.

If the sound insulation measures tested in the post-completion report prove to be insufficient, additional sound insulation measures (where necessary to ensure the appropriate sound insulation levels can be met), shall be submitted and approved in writing by the Local Authority and installed and tested prior to occupation.

The final approved sound insulation scheme shall be implemented and maintained in accordance with the approved plans thereafter.

Code of Practice on Construction and Demolition

Please apply as appropriate to minimise the impact of the conversion and building works on nearby residential premises.

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.

GBC Private Housing

Where the HMO is the applicants preferred option, the team will require a site visit to the premises to discuss licencing requirements, but we do not foresee any issues for a 2 x 1 bed flats and a 10 person 10 household HMO.

Neighbouring Properties

- 5.1. The application has been advertised by individual neighbour letters to 18 properties, in the press and on site. The overall consultation period expired on 1 November 2024.
- 5.2. No letters of objection were received.
- 5.3. Local Ward Councillors were also consulted, and no responses were received.

6. Planning Analysis and Interim Development Manager Comments

Principle of Development

- 6.1. The application site is within the urban boundary of Gravesend. Policy CS02 of the Core Strategy 2014 prioritises development in the urban area as a sustainable location for development. The site also lies within the Gravesend Town Centre Opportunity Area. Policy CS05 relates to this Opportunity Area and within this area states that the Council will:
- *Support the provision of new residential development where a satisfactory living environment can be achieved; and*
 - *Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character.*
- 6.2. Due to the urban site location of Nos. 2-3 Berkley Road in Gravesend, the principle of residential development as proposed would therefore generally be supported. Indeed, a residential conversion of part of the proposal buildings has already been approved under application 20191203 and therefore the principle of such development is established.
- 6.3. Furthermore, Policy CS02 of the Core Strategy 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 at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing 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 Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF (2024).
- 6.4. 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 strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."
- 6.5. In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF (2024) at footnote 7 (rather than those in development plans) relating to any of the following:
- Habitats sites (and those sites listed in NPPF (2024) paragraph 189) and/or designated as Sites of Special Scientific Interest;
 - Green Belt;
 - Local Green Space;
 - National Landscape;
 - A National Park or Heritage Coast;
 - Irreplaceable habitats;
 - Designated heritage assets (and other heritage assets of archaeological interest, see NPPF footnote 75); and
 - Areas at risk of flooding or coastal change.
- 6.6. 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 130(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.

- 6.7. In this instance, the proposed development would result in 2 one bedroom flats and a HMO containing 10 bedrooms. An HMO would only contribute towards the local housing need if the HMO were created by a change of use from a non-residential building. As the existing building is non-residential the HMO rooms would be included in the uplift. The 2 flats and 10 room HMO would therefore result in an increase to the housing supply by 3, which would be a moderate increase and, accordingly, this weighs in support of the application.
- 6.8. House in Multiple Occupation (an HMO), if they were a house before, cannot be counted as a net additional dwelling, as they would have been counted as a net additional dwelling in a previous year. However, if a House in Multiple Occupation is created by change of use from a non-residential building, then it can be counted as one net additional dwelling.
- 6.9. As part of the balancing exercise, it should be noted that paragraphs 131, 135 and 203 respectively require development to achieve high quality, beautiful and sustainable buildings and places; to add to the overall quality of the area, be visually attractive, and create a high standard of amenity for existing and future users; and to make a positive contribution to local character and distinctiveness.
- 6.10. 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 relevant policies in the National Planning Policy Framework and the adopted development plan taken as a whole. These matters will be considered further below.

Loss of Employment

- 6.11. Policy CS07 of the Core Strategy 2014 is relevant to the economy, employment and skills, and states that:

“Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy or where:

- *the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or*
- *the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or*
- *the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.”*

- 6.12. The development would lead to the full loss of what was termed Use Class B1 employment floorspace on the proposal site, according to the planning history of the site. This use has been subsumed into Use Class E (Commercial, business and service) further to the implementation of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. It should be noted that there are now provisions within the Town and Country (General Permitted Development) (England)

Order 2015 (as amended) to allow for changes of use from Class E to Class C3 (dwellinghouses) developments.

- 6.13. The application of Policies CS05 and CS07 require specific matters to be demonstrated in order to justify the loss of employment floorspace proposed. The submitted Planning Statement sets out that the Anglo-Saxons Friendly Society moved its premises from Berkeley Road in 2019 in favour of its offices in Northfleet and has been vacant since that time. The Anglo-Saxons Friendly Society listed their vacant premises for sale on the open market in 2021 – 1 March 2024 with Haart Estate Agents who marketed it through a number of channels including On The Market, Rightmove (online site), Haart website, shop window and email to Haart's client list. There was no interest for partial or total commercial use of the building as per the 2020 permission, ref. 20191203 nor its previous commercial use of the entire building.
- 6.14. This justification helps support the stance that the benefits of the development proposal for housing outweigh any harm with regard to the loss of the employment floorspace, and demonstrates the applicant following the requirements of Policy CS07, with the site being marketed in accordance with Council guidance and no demand for the floorspace for commercial use being demonstrated.

Design and Impact on Conservation Area

- 6.15. Section 12 of the NPPF 2024 relates to achieving well-designed places and sets out the Government's requirements in relation to design issues. Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 131 of the NPPF 2024 states 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 135 of the NPPF 2024 seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.
- 6.16. Whilst it is recognised that development which makes effective use of land should be supported (paragraph 124), this comes with the proviso that it should safeguard and improve the environment and not conflict with other policies in the NPPF 2024. Relevant to this proposal, paragraph 129 of the NPPF 2024 states that developments that makes efficient use of land should be supported, taking into account the identified need for different types of housing, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed places.
- 6.17. In a similar vein, Policy CS14 of the Core Strategy 2014 sets out that new housing development is expected 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. The proposal would form 1 bedroom dwellings in an area where there are similar sized properties and this would therefore be supported by Policy CS14 of the Core Strategy 2014, providing design and character is also acceptable.
- 6.18. The NPPF 2024 also places great significance on new development making a positive contribution to local character and distinctiveness (paragraph 210). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved and enhanced. Saved Policy TC3 of the Local Plan 1994 also states that development is expected to make a positive contribution to the conservation area. As the proposal site lies within the

King Street Conservation Area, these policies are all relevant to the consideration of this application.

- 6.19. From a conservation point of view, Berkley Road is recognised as being a self-contained late 19th century residential area with small, terraced houses, and as stated in the Character Appraisal one of the principal features of the conservation area in Berkley Road is the landmark Anglo Saxons Friendly Society buildings and large yard doors. Generally, in this area, the properties have quality features such as round headed sash windows and doors. However, many of the windows and doors have been replaced with uPVC which has undermined the historic character of these streets.
- 6.20. With regards to the proposed extensions, under the previous 20170619 and 20191203 applications, there were concerns raised with dormers, but it was recognised that these were at the rear and would not be visible from the street. Under the previous proposals for the site, the dormers were recognised as neutral features of the conservation area. The proposed rear extension would be single storey and would be smaller than the existing rear structures that are proposed to be removed, and again would not be visible from the street and would not therefore have an adverse impact on the conservation area.
- 6.21. The proposal to convert the buildings to residential would result in minimal changes to the elevations, particularly at the front, and generally seeks to retain and reinstate the notable building features recognised in this part of the conservation area. It is noted that to improve some existing negative features of the conservation area the existing uPVC windows with top hung casements, currently visible on the front elevation, will be replaced with double glazed timber frame sash windows. It is stated these will carefully replicate the traditional design detailing of timber box sash windows visible elsewhere along the street. This would be a positive aspect of the proposed development. Details of the windows should be conditioned to ensure the ground floor windows have arched upper sashes to match the original windows found elsewhere on the road, as seen at Nos. 17, 18 and 19. This would ensure a high standard of finish.
- 6.22. On this basis, the proposal would be considered to comply with the aforementioned national and local policies in terms of design and would enhance the character and appearance of the conservation area.

Residential Amenity

- 6.23. The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should 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.

Future Occupiers

Flats

- 6.24. The Nationally Described Space Standard (NDSS) 2015 sets out the minimum gross internal floor area (GIFA) standard for new dwellings. The table below shows the minimum standard set out in the NDSS 2015 against the sizes of the proposed flats within the development:

Number of bedrooms (b)	Number of bedspaces (persons)	1 storey dwellings (NDSS) (m²)	Proposed flat GIFA (m²)
1b	2p	50	40

- 6.25. It is considered that the proposal would fail to comply with the Technical Housing Standards - Nationally Described Space Standards in terms of the size of the proposed accommodation for the 1 bedroom units and their proposed number of occupiers (2). However, these units would meet the standard for single occupancy.
- 6.26. In addition, in relation to the more up-to-date Council standards set out in the Residential Layout Guidelines SPD (2020) the proposed room sizes would be acceptable in relation to a double bedroom (in excess of the 11.2m² standard at 13.3m²). There is no specific standard for a combined kitchen/living/dining space, which for both flats would be approximately 23m². If the floorspace standards for a kitchen/diner plus living room are added together, or a lounge/diner and kitchen, it is suggested approximately 25m² would be sought. The proposed floorspace is therefore slightly below the standards, but the plans demonstrate that the space would be capable of accommodating the furniture and fittings that would normally be associated with the use of this space, in compliance with the requirements of the SPD. Overall, the floorspace is considered to be acceptable.
- 6.27. The ground floor unit would also have access to external amenity space, which would be in excess of 10m² (as required by the Council's SPD for a 2 plus bedroom unit) at approximately 16m². None would usually be required for 1 bedroom units. There are public open spaces easily accessible from the application site. Amenity provision is therefore considered to be acceptable.

HMO

- 6.28. The Council's adopted 'Guidance for HMO Amenity Standards' (2023) include appropriate minimum room size requirements for this application type. For a one-person unit there should be a minimum bedroom floor area of 6.51m² and for a two-person unit there should be a minimum bedroom floor area of 10.22m².
- 6.29. Each bedroom in the proposed HMO is in excess of 10.15m² and would have its own ensuite. This would be in excess of the national minimum size for 1 person HMO rooms (6.51m²). The submitted Planning Statement confirms the HMO would be single occupancy.
- 6.30. There would be a kitchen/breakfast space and a living and dining space located on the basement floor of the HMO. The HMO Amenity Standards (2023) also provides minimum requirements for communal kitchens/living/dining areas.
- 6.31. If dining facilities are combined with the living room, the room should be at least 14m² for 3 people, plus 1m² for every additional person, which for this proposal would equate to 21m². A minimum kitchen area of 11m² for up to 10 occupants would be required (totalling 32m²). The proposal would provide a combined kitchen/living/dining area of 35m², so would meet the minimum HMO amenity requirements.
- 6.32. The basement level accommodation includes existing lightwells to the front and a sunken courtyard and glazed doors at the rear to provide outlook and light to these rooms.
- 6.33. There are commercial uses that adjoin the site to the west and south. A 'Sound Insulation Assessment' dated September 2024 by Able Acoustics (Report Ref: P1603) has been submitted and reviewed by the Council's Environmental Protection Team. The

methodology and findings of the report are accepted, and this includes the upgrading of various floor/ceiling partitions across the 2 floors and between the HMO units. There are no objections to this application from an environmental protection perspective, subject to a condition requiring the sound insulation measures being implemented and a post completion noise survey being undertaken.

- 6.34. On this basis, the proposed residential conversion would not be adversely impacted by any noise/disturbance associated with adjacent uses or within the properties themselves and would ensure an acceptable level of amenity, in accordance with Local Plan Policy CS19.

Neighbouring Properties

- 6.35. The closest neighbouring residential properties are No. 4 Berkley Road adjoining to the north and Nos. 19-22 Berkley Road, which are located across the road. No. 1 Berkley Road is a commercial property (occupied by Royal Mail) that adjoins to the west and south. Residential properties at first floor level at Nos. 4 to 10 Queen Street face the rear elevation of the site.
- 6.36. A residential use of the properties is not likely to have any adverse impact on neighbouring amenity. There are other residential uses along the terrace, and the proposed use would be in keeping with this.
- 6.37. The proposed development would not introduce any new openings in the front elevation and as such, there would be no change to the existing levels of privacy for the occupiers of properties located opposite the site.
- 6.38. Due to the single storey nature of the proposed extension at the rear, the distances between properties and screening provided by existing boundary treatments, it is considered that the proposed rear dormer and extension would have no adverse overlooking, overshadowing or overbearing impacts on any surrounding residential occupiers.
- 6.39. On this basis, the proposal would comply paragraph 135 of the NPPF 2024 and Policy CS19 of the Core Strategy 2014 in respect of amenity.

Parking and Highways

- 6.40. There is no car parking provision proposed, nor is there any existing. It was accepted in the previous application for a conversion to two units that as the site is located in a town centre location, close to public car parks and a variety of shops and services and because the site is accessible by public transport, there would be no significant adverse impact on highway safety or parking, and the proposal would be in line with Policy CS11 of the Core Strategy 2014 and Saved Policy P5 of the Local Plan 1994 (Policy P5 states the for changes of use the parking standards may be relaxed, provided on-street parking problems in the area are not exacerbated). It was also noted that the existing use had the potential to generate a significant level of vehicle movements. This matter is not considered any differently with the full residential conversion of the site. To support this, there have also been no objections from neighbours.
- 6.41. Secure and weatherproof bicycle parking would be provided at the minimum rate of one space per bedroom. This should be conditioned to be provided as proposed

Other Material Considerations

Birds

- 6.42. As the application site is within 6km of the Thames Estuary and Marshes SPA/Ramsar Sites and would provide additional residential accommodation, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. On this basis a tariff of £3,939.24 is required (for 12 additional dwellings proposed on the site).
- 6.43. The applicant has signed a SAMMS Contribution Agreement and paid the appropriate tariff for the development, which would meet the requirements of paragraphs 187 and 194 of the NPPF 2024 and Policy CS12 of the Core Strategy 2014.

Biodiversity Net Gain (BNG)

- 6.44. Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.
- 6.45. In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 6.46. Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
- 6.47. In this case, the proposed development is covered by an exemption: it is a development below the threshold as it does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. The existing 'habitat' on the site measures 24m². Therefore, the development would not be subject to biodiversity net gain.

Waste

- 6.48. Policy CS19 of the Core Strategy 2014 requires new development to incorporate facilities for the storage and recycling of waste generated.
- 6.49. The proposal includes adequate provision for refuse storage within the rear amenity area for the HMO, with a clear pathway from the back to the front of the building. There would be a store in the rear garden area for the ground floor flat and an internal store with internal sliding doors and a window on the ground floor for the first floor flat. The Council's Waste team are satisfied with the arrangement. The bin stores should be conditioned to be provided.

7. Equalities Considerations

- 7.1 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2 In summary, the Council must, in the exercise of its function, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - Advance equality of opportunity between people who share a protected characteristic and those who do not;
 - Foster good relations between people who share a protected characteristic and persons who do not share it.
- 7.3 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 7.4 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value.
- 7.5 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- The essential guide to the public sector equality duty
 - Meeting the equality duty in policy and decision-making
 - Engagement and the equality duty
 - Equality objectives and the equality duty
 - Equality information and the equality duty
- 7.6 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice.
- 7.7 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.

8. Human Rights Implications

- 8.1. In determining this application, the Council is required to have regard to the provisions of the Human Rights Act 1998. Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. "Convention" here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant including:
- Article 8: Respect for your private and family life, home and correspondence
 - Protocol 1, Article 1: Right to peaceful enjoyment of your property
- 8.2. Along with any supporting material supplied by the applicant, this report has outlined the consultation that has been undertaken on the planning application and representations made to the Council as Local Planning Authority.
- 8.3. In determining the application, the Council needs to satisfy itself that the potential adverse amenity impacts are acceptable and that any potential interference with the above Convention Rights are legitimate and justified. Both public and private interests are to be considered in the exercise of the Local Planning Authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. The Council must, therefore, carefully consider the balance to be struck between individual rights and the wider public interest.
- 8.4. In making the recommendation on this application, consideration has been given to the requirements of the Human Rights Act. Where it is engaged, any interference in those rights is considered proportionate, lawful and in the public interest to secure the proper planning of the area in accordance with adopted policy, having regard to any other material considerations.

9. Conclusion

- 9.1. In this case, the proposal would provide a modest contribution towards increasing housing provision in the area, and subject to conditions, the proposal is considered to be acceptable in terms of the design and impact of the proposal on the application site and the character and appearance of the surrounding conservation area, and with regards to residential amenity and highway matters. In addition, the proposal would be acceptable in terms of the Thames Estuary and Marshes Special Protection Area and Ramsar site. The proposal would therefore comply with the requirements of Saved Policies T1, P3 and P5 of the Local Plan First Review 1994, Policies CS01, CS02, CS11, CS12, CS14 and CS19 of the Core Strategy 2014, and paragraphs 11, 116, 124, 129, 131, 135, 187, 194, 203 and 210 of the NPPF 2024, and the standards set out in the NDSS 2015, SPG2 2020, SPG4 2006 and Guidance for HMO Amenity Standards 2023.

Recommendation

The recommendation is for the application to be **PERMISSION** subject to the following conditions and informatives:

Time Limit

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Approved Plans

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Application form

Drawing no. 5294/PL/100 (Block and Location Plan)
Drawing no. 5294/PL/101 (Proposed Block Plan)
Drawing no. 5294/PL/101 (Existing Basement Floor Plan)
Drawing no. 5294/PL/111 (Existing Ground Floor Plan)
Drawing no. 5294/PL/112 (Existing First Floor Plan)
Drawing no. 5294/PL/113 (Existing Second Floor Plan)
Drawing no. 5294/PL/114 (Existing Roof Plan)
Drawing no. 5294/PL/115 (Existing Section D-D)
Drawing no. 5294/PL/116 (Existing Section A-A)
Drawing no. 5294/PL/117 (Existing Front Elevation)
Drawing no. 5294/PL/118 (Existing Left Elevation)
Drawing no. 5294/PL/119 (Existing Right Elevation)
Drawing no. 5294/PL/120 (Existing Rear (West) Elevation)
Drawing no. 5294/PL/130 (Proposed Basement Floor Plan)
Drawing no. 5294/PL/131 Rev. B (Proposed Ground Floor Plan)
Drawing no. 5294/PL/132 Rev. A (Proposed First Floor Plan)
Drawing no. 5294/PL/133 (Proposed Second Floor Plan)
Drawing no. 5294/PL/134 (Proposed Roof Plan)
Drawing no. 5294/PL/135 (Proposed Section D-D)
Drawing no. 5294/PL/136 (Proposed Section A-A)
Drawing no. 5294/PL/137 (Proposed Front Elevation)
Drawing no. 5294/PL/138 (Proposed Left Elevation)
Drawing no. 5294/PL/139 (Proposed Right Elevation)
Drawing no. 5294/PL/140 (Proposed Rear (West) Elevation)
Sound Insulation Assessment (September 2024)

Reason: For the avoidance of doubt and in the interests of proper planning.

Matching Materials

3. Notwithstanding the details on the approved plans, the proposed building finishes to be used in the construction of the external surfaces of the development hereby permitted shall match those used in the existing building.

Reason: To ensure a satisfactory visual relationship between the existing and the new development, in accordance with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014.

Details of Windows and Doors

4. Notwithstanding the details on the approved plans, prior to the commencement of any above ground works, full details of the windows and doors on the front elevation of the building shall be submitted to and approved in writing by the Local Planning Authority. These details shall include ground floor arched windows with an arched upper sash, and glazing bar patterns to match the original windows at Nos. 17, 18 and 19. The development shall be implemented in accordance with the approved details.

Reason: In order to ensure an acceptable standard of development upon completion and to enhance the character and appearance of the conservation area, in accordance with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014.

Sound Insulation Measures

5. The sound insulation measures as detailed in the 'Sound Insulation Assessment' dated September 2024 by Able Acoustics (Report Ref: P1603) (The Report) shall be carried out as approved and implemented by competent persons.

No flat or HMO room shall be occupied until a post-completion noise survey has been undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. The post-completion testing shall assess performance of the sound insulation measures against the criteria as set out in The Report.

If the sound insulation measures tested in the post-completion report prove to be insufficient, additional sound insulation measures (where necessary to ensure the appropriate sound insulation levels can be met), shall be submitted and approved in writing by the Local Authority and installed and tested prior to occupation.

The final approved sound insulation scheme shall be implemented and maintained in accordance with the approved plans thereafter.

Reason: To ensure the protection of residential amenity, in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Waste Storage

6. The development hereby approved shall not be occupied until the waste storage facilities shown on the approved drawings have been fully provided and made available for use. These facilities shall be retained for use by site users at all times thereafter.

Reason: In order to ensure the development is served by suitable refuse storage areas in the interests of amenity, in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Cycle Storage

7. The development hereby approved shall not be occupied until the cycle storage facilities shown on the approved drawings have been fully provided and made available for use. These facilities shall be retained for use by site users at all times thereafter.

Reason: In order to encourage options for sustainable travel in accordance with Policies CS11 and CS19 of the Gravesham Local Plan Core Strategy 2014.

INFORMATIVES:-

1 CODE OF PRACTICE FOR CONSTRUCTION/DEMOLITION SITES WITHIN THE BOROUGH OF GRAVESHAM

This Code of Practice relates to all building sites in Gravesham and is given to ensure best practice is achieved equally throughout the borough. All aspects of the code apply to every building site and will only be altered on an individual basis if there are found to be special circumstances on that particular site. Any amendment made will be in writing by an authorised officer of the Environmental Health Department. The following circumstances are given where consideration will be given to a variation in the Code of Practice:-

- a) Where occupiers of noise sensitive properties are unlikely to be affected by the works.
- b) Where the work cannot be carried out during the hours specified because of the requirements of another authority such as the emergency services, utilities, traffic management authorities etc.
- c) Where the site location is isolated or where the works are in a mainly commercial/industrial area with few residential properties.

In all the above cases the onus will be on the applicants to provide written justification as to why the code should be varied. When making such a statement the applicant must include the following information where appropriate:-

- i) Location, nature and duration of works.
- ii) Measured/predicted noise levels and background levels.
- iii) Measured/predicted vibration levels.
- iv) Proximity and numbers of residential properties.
- v) Evidence of public consultation/information to persons likely to be affected.
- vi) Written evidence from the appropriate authority (in instances where b) above applies).

In order for adequate consideration to be given by this Council to a request for deviation from the Code of Practice, any proposal must be provided in writing to the Environmental Health Services Manager at least fifteen working days prior to the works starting.

On developments where construction/demolition is undertaken on contaminated land, work will be required to be carried out in a way which will be specified within conditions of the site's planning approval.

The requirements of this Code of Practice should prevent unnecessary disturbance to nearby residents. In the event of a nuisance being caused due to work not being carried out in an appropriate way, the council may take enforcement action to resolve the situation.

Please note compliance with Health and Safety requirements arising from construction/demolition work shall be given priority over this Code of Practice.

BURNING OF MATERIAL

It is expected that no burning of materials shall take place on a construction or demolition site. Where the contractor is of the opinion that this is unavoidable he shall make representations to the council for consideration. No burning will be allowed to take place without written authority from a suitably authorised officer of the council. Any burning so authorised will be subject to strict controls which will include, amongst other matters, the following:-

- o A strict control on the amount of material burnt at any one time.

- o Burning is carried out under the direct and continuous supervision of the person responsible for the site or a person authorised to act on his behalf.
- o All material shall be kept dry prior to being burnt.
- o The wind shall be positively blowing away from nearby residential or other sensitive buildings. Where this is not possible burning shall take place in still weather.

NOISE AND VIBRATION

Where sensitive premises are likely to be affected by noise and/or vibration, all works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the council, shall be carried out only between the following hours (these to be known as normal working hours) : -

Monday - Friday	08:00 - 18:00
Saturdays	08:00 - 13:00
Sunday and Bank Holidays. No works audible at the site boundary or any other place agreed by the council.	

In addition to the above times the contractor may use up to one hour before and up to one hour after normal working hours for start up and close down of activities. Examples of these activities would be:

- a) Day to day maintenance, checking, lubrication and cleaning/washing down of plant and machinery.
- b) Refuelling of plant and machinery (from on-site storage facilities only).
- c) Deliveries and unloading.
- d) Site inspections and safety checks, but excluding any works necessary to make the working zone and/or construction site safe (which are to be undertaken within normal working hours).
- e) Arrival and departure of workforce and staff at the construction site, but only in so far as the arrival and departure times provide for the minimum time necessary to undertake the tasks allowed by these start up/close down activities.
- f) Site meetings.
- g) Site clean up.

NB The start up and close down periods are not to be regarded as an extension to the normal working day.

Where the site boundary/entrance is located adjacent to noise sensitive areas it must be ensured as far as possible that vehicles do not arrive on site outside the times laid out above. Where this is found not to be possible, drivers of vehicles arriving at the site before it is open must not leave the vehicle's engine running or cause other excessive noise/pollution whilst they are waiting.

On the site itself, best practicable means as defined in section 72 of the Control of Pollution Act 1974 to reduce noise to a minimum shall be employed at all times.

Compliance with BS5228 Part 1:1997 'Noise control on Construction & Open sites' is expected as a minimum standard. This requires amongst other things that all plant and machinery in use shall be properly silenced, maintained and used in accordance with the manufacturer's instructions.

Criteria and procedures for vibration control are assessed using different parameters as follows:

- * Vibration Dose Values (VDVs) are used to protect the occupants and users of buildings from disturbance. (VDVs are defined in BS 6841 and their application is discussed in BS 6472).
- * Peak Component Particle Velocity is used to protect buildings from risk of physical damage. These are assessed in accordance with BS 7385.

Best Practicable means shall be used to control vibration levels so that the following Vibration Dose Values measured on a normally loaded floor in accordance with BS 6472:1994 are not routinely exceeded as a result of works.

Building Type	Period	VDV (ms ^{-1.75})
Residential Buildings, Educational Establishments, Offices and similar	Normal working hours	0.4
Commercial	Normal working hours	0.8

Best Practicable Means shall be used to control Peak Component Particle Velocity measured at the base of any building in accordance with BS 7385 does not routinely exceed a level of 10 mm/s.

In instances where complaints of vibration are received within any adjacent property then the contractor shall immediately take all measures necessary to demonstrate that the vibration levels are below the limits shown in the paragraphs above.

Where the results of any monitoring indicate non-compliance with the limits stated above, the contractor shall immediately change the method of working, and/or the plant being used. Prior to the work recommencing, the contractor shall satisfactorily demonstrate that the new arrangements satisfy the vibration limits.

DUST

Dust suppression techniques shall be used on site where significant quantities of spoil or fine aggregates are stored and/or where the site location is such that it is likely persons living in residential properties are going to be affected by wind blown dust.

Spoil temporarily placed on site shall be located as far away from sensitive properties as possible. The height of stored material shall be kept as low as is practical and water sprayed onto the surface of the piles shall be used as appropriate to keep the surface damp.

Where longer term storage of fine aggregates and other potentially dusty material is necessary, suitable storage facilities shall be used where practicable in order to screen these materials from the wind. This stored material shall be located so that it is as far away from sensitive properties as possible and measures to prevent wind blown dust shall be adopted. These shall include:-

- * keeping the height of stock piles as low as possible,
- * using water sprays as appropriate whilst minimising the production of excessive runoff,
- * minimising the re handling of dry construction materials and spoil,
- * keeping the loading drop heights to as low as possible,
- * where appropriate applying the surfaces of roads on site with water sprays as necessary and/or using wheel-washing facilities.

* all materials transported to and from the site shall be conveyed by suitable vehicles in enclosed containers or using other adequate wind shielding measures such as sheeting.

The person responsible for the site shall keep on site a daily log book which will be available to visiting authorised officers and shall list the following:-

- * the conditions on site,
- * whether any wind blown dust was visibly coming off the site,
- * what control measures were carried out, and
- * what the results of these were.

COMMUNICATION

It shall be a matter of priority for a contact name and telephone number to be set up in order to enable ready two-way communication and contact with the council and local residents. In cases where work likely to cause a disturbance is to be carried on out of normal working hours, the phone line would be manned whilst the work is ongoing.

LIGHTING

Where security and/or site lighting is used, this shall be located and directed or screened so that it does not cause undue intrusion to adjacent occupied residential properties, or sensitive areas, or constitute a road hazard, and shall be chosen to limit light pollution effects such as "glow in the sky".

2 DEVIATION FROM APPROVED PLANS

It is possible that any proposed deviation from the approved plans could be classed as a 'material' change requiring a further application/permission. In the event that any change is proposed, applicants are advised to seek advice from the Local Planning Authority [as proceeding without the necessary permissions could nullify this permission].

3 NAMING & NUMBERING

As a result of the changes to this property, it appears that a change has to be made to the national property gazetteer. It is a legal requirement that a property or premises is registered.

The Naming and Numbering Certificate, when issued, will reduce location or delivery problems via Royal Mail or other carriers, and importantly for the Police, Ambulance, and Fire & Rescue services. Registration is also necessary to register to vote, for utility connections, and will avoid duplicate addresses.

The Naming and Numbering service is provided by the Borough Council. The on-line form is available at the Planning/House Numbering page of the council's web-site <http://www.gravesham.gov.uk/street-naming>. Please submit the application and the requisite fee in accordance with the guidance on the form.

4 BUILDING REGULATIONS AND PARTY WALL ACT

This decision DOES NOT imply any consent which may be required under the Building Regulations or under any other enactment or provision. Nor does it override any private rights

which any person may have relating to the land affected by this decision, including the provisions of the Party Wall etc. Act 1996.

5 MAINS DRAINAGE

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. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

DOMESTIC REFUSE ARRANGEMENTS: SINGLE DWELLINGS

The dwelling should have sufficient storage capacity to cope with the waste generated in between collections (1 week).

DOMESTIC REFUSE ARRANGEMENTS: ADVISORY NOTES

Plastic sacks are issues for solid waste storage and collection will be from the front entrance to the property adjacent to the road or footpath.

6 DESIGNING OUT CRIME

You should be aware of the recommendations set out in the Kent Police consultation response letter dated 27 September 2024 and are advised to contact them about site specific designing out crime (Alistair.hendry@kent.police.uk).

7 STATEMENT OF POSITIVE AND PROACTIVE APPROACH TO DECISION-MAKING

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 38 of the National Planning Policy Framework (NPPF) 2023, the Local Planning Authority has approached the assessment and determination of this application in a positive and creative way and, where appropriate, has worked pro-actively with the applicant to secure a development that is sustainable and that improves the economic, social and environmental conditions of the area, and that is in accordance with the Development Plan for the area.