



Delegated Report

Householder Planning Application

Planning Application No: 20221060

Location: 14 Chalky Bank Gravesend Kent DA11 7NY

Description: Demolition of existing garage and retention of 3 bedroom dwelling.

Applicant: Mr Jasnang Singh

Site Visit Date: 04 April 2023

Submitted Documents/Plans

Planning Application form;
Red line site boundary plan at 1:1250 scale;
Drawing no. CB/02 Rev. 8 Existing and proposed block plans;
Drawing no. CB/02,8A Existing and proposed plot layouts; and
Drawing no. CB/08A Existing and proposed building elevations, proposed layouts and section.

Procedural issues

The application was originally submitted as a minor material amendment to planning permission reference number 20180387 to allow roof alterations including two dormers to the southern elevation, two velux windows to the northern elevation and the conversion of the roof space into habitable rooms. However due to the extensive nature of the proposed changes (such that they would alter the operative part of the planning permission), the applicant was required to apply for full planning permission instead.

It should be noted that upon receipt, the application was initially made valid and publicity and consultation were undertaken. Following an assessment by the case officer, the application was then made invalid. Once additional information was submitted, the application was then re-validated and a further round of publicity and consultation was undertaken.

It should also be noted that the submitted elevation drawing (reference CB/08A) does not illustrate the existing building accurately. The eaves height and overall height of the building are lower on the drawing than in reality;



Extract from drawing no. CB/08A Existing elevation



Photograph of the site taken 04.04.2023

This is due to drawing no. CB/08A showing the approved proposed elevations under planning permission reference 20180387 as the existing elevations in the current application, rather than the true elevations on site.

Despite this inaccuracy, it is possible to make an accurate assessment of the proposed development and determine the application.

Relevant Planning History

Reference	Description	Decision	Decision Date
20210619	***REVISED***Demolition of existing garage and retention of 3 bedroom dwelling.	Withdrawn	23.06.2022
20180387	Demolition of existing garages and erection of a two bedroom dwelling.	Permitted	25.10.2018

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 12 – Achieving sustainable development and well-designed places

Supplementary Planning Guidance

- 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – nationally described space standard (2015)
- SPG 4 - KCC Parking Standards (2006)
- Kent Design Guide: Interim Guidance Note 3 Residential Parking (2008)
- KCC Residential Dropped Kerb Guidance and Self-Assessment (2022)
- Householder Extensions/Alterations Design Guide (2021)

- Five Year Housing Land Supply Statement 2020-25 (January 2021)

Consultations, Publicity and Representations

GBC – Environmental Protection Team (Regulatory Services)

Initial response:

Having reviewed the application we can see no Environmental Protection impacts that the redesigned roof would have therefore we have no comments.

Second response:

No objection to this application. The following conditions/informatives are recommended:

Code of Practice on Construction and Demolition - Please apply as appropriate.

Lighting - Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

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 – Highways Officer

Initial response:

The proposal allows for two car parking spaces, so is acceptable. However, with an additional bedroom in the roof space, a secure cycle parking space should be provided for the additional bedroom to comply with the requirements of SPG4 of one cycle space per bedroom for a house.

Second response:

The proposal allows for two car parking spaces, so is acceptable. However, with three bedrooms three secure cycle parking space are required to comply with the requirements of SPG4 of one cycle space per bedroom for a house.

Given the space limitations of the front garden, the driveway should be constructed from a bound permeable material.

As the existing dwelling is included within the red line, it is suggested that it should be a requirement for two parking spaces be provided for this dwelling to ensure nil detriment as a result of the development. This will require the extension of the carriage crossover and the applicant will need to consult Kent County Council on this issue. However, to ensure adequate car parking is available for both properties I would recommend that the new dwelling cannot be occupied until a new driveway and the carriage crossover constructed to serve the existing dwelling is provided.

Neighbouring properties

The application was publicised on two occasions to ten neighbouring properties by letter. Three representations have been received and are summarised as follows;

- The change in width and height of the dwelling would not be in keeping with the neighbouring properties.
- The proposal would result in a significant increase in square footage.
- The proposal would raise the soffit height by 0.5 metres, which would not be consistent with the neighbouring property and look out of keeping with it.
- The floor area of the room in the loft space could allow it to be subdivided to create two extra bedrooms, five in total.
- Two parking spaces would not be sufficient for a three bedroom property and lead to parking on

Chalky Bank, which could compromise access to surrounding properties.

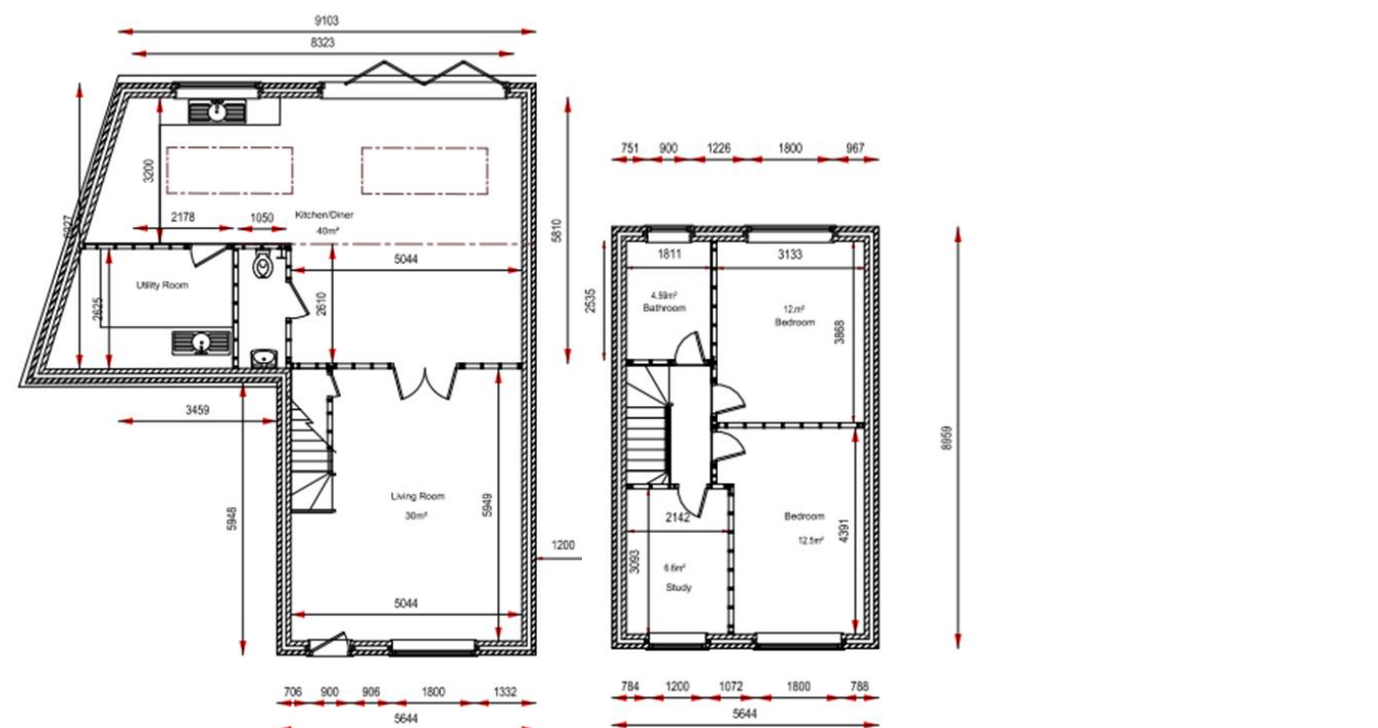
- The depth of the proposed parking space in front of the porch looks compromised.
- Queries how the proposed parking would work as two spaces are located at the neighbouring property.
- Adverse overlooking impacts to no. 16 Chalky Bank.
- The building works have adversely impacted on the enjoyment of the garden at no. 16 Chalky Bank (scaffolding and damage to boundary treatments).
- The abandoned site is an eyesore.

Officer's Analysis

Background

Planning permission was granted under reference 20180387 for the erection of a two bedroom dwelling in the side garden area of no. 14 Chalky Bank. The building works are ongoing but condition 3 of that permission has not been discharged (details of external facing materials before commencement of above ground level works) and the works are not in accordance with the approved plans. This application is an attempt to regularise the unauthorised development, as well as some other changes.

The approved layouts and front and rear elevations under 20180387 are as follows;



Front elevation (new build and no. 14)

Rear elevation (no. 14 and new build)

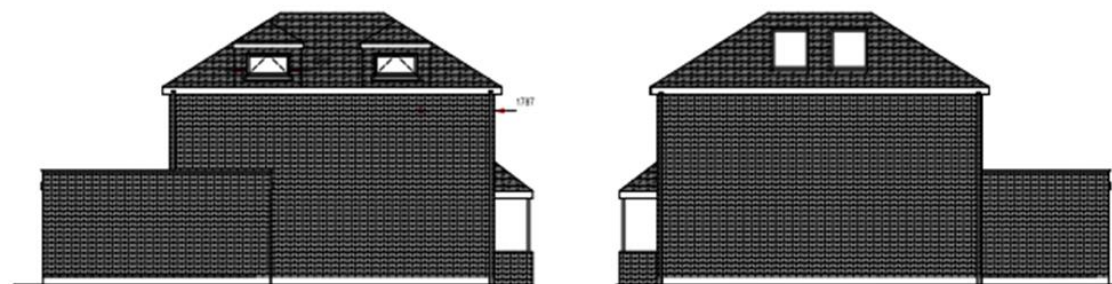
The current proposal would increase the height of the building overall, raise the eaves height and introduce two dormers into the southern side roof slope and two velux windows into the northern side roof slope. Internally the first floor study would be reduced in size, in order to accommodate a staircase into the loft, where a single bedroom would be formed. The dwelling would increase from two bedrooms to three.

The proposed elevations and layouts are as follows;

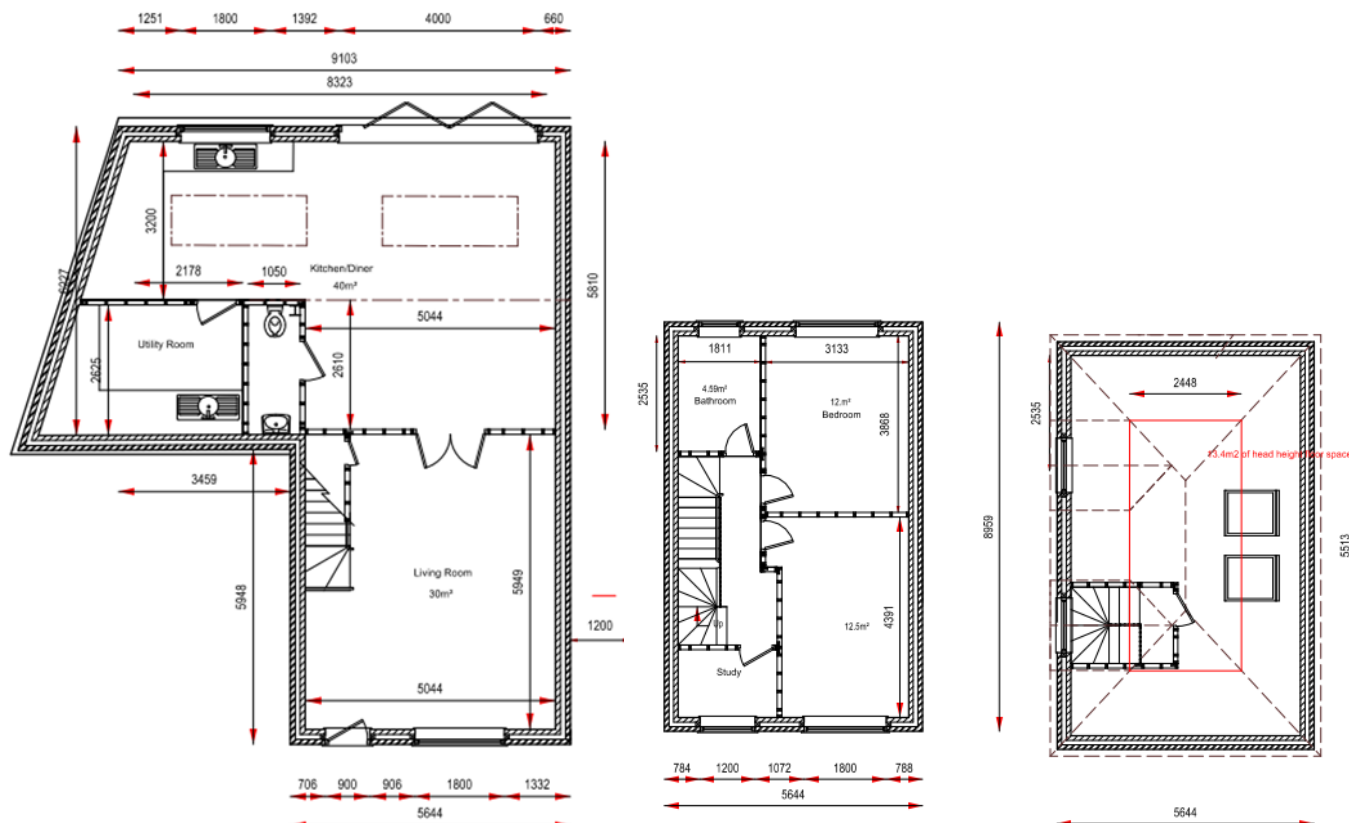


Front elevation (new build and no. 14)

Rear elevation (no. 14 and new build)



Side elevations



It should be noted that planning permission 20180387 is a material consideration in the determination of the current application. As such, the delegated report for that application is contained in Appendix 1.

Principle of the Development

Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 prioritises development in the urban area as a sustainable location and seeks to achieve this by promoting regeneration by prioritising redevelopment and recycling of underused, derelict and previously developed land, predominately in Opportunity Areas located within Gravesend and Northfleet.

Furthermore Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 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. Gravesham is currently unable to demonstrate a five year housing land supply and it should be noted that this was not the case when planning permission for 20180387 was granted.

Reference to the Five Year Housing Land Supply Statement 2020-25 illustrates that a 3.27 year supply has most recently been calculated. In addition, this document illustrates that the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test. Therefore 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 National Planning Policy Framework 2021 (NPPF 2021). This paragraph 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 2021 at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 180)
- 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)
- Areas at risk of flooding or coastal change.

The application site is not an asset or area of particular importance as defined above. Therefore paragraph 11(d)(ii) of the NPPF 2021 is relevant to the consideration of this application.

Overall, 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) of the NPPF 2021) 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 would provide one new market dwelling, which would represent a minimal increase in housing supply, which weighs in favour of the proposal. However, this has to be balanced against the other requirements of the NPPF 2021 and in particular, Sections 2, 5, 9, 11, 12, and 15, which require development to be sustainable and make effective use of land, to add to the overall quality of the area, be visually attractive, sympathetic to local character and to provide a high standard of amenity for existing and proposed users; to provide safe and suitable access; and to contribute to and enhance the

natural and local environment. These issues will be discussed in detail in the sections below.

As the application site already has planning permission for a single dwelling (20180387), the principle of a new dwelling within the side garden of no. 14 Chalky Bank has previously been accepted.

Design, Character and Appearance

Paragraph 130 of the NPPF 2021 sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 134 of the NPPF 2021 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

Policy CS14 requires new housing development to provide a range of dwelling types and sizes, taking account of the existing character of the area and evidence of local need.

Policy CS15 requires new housing to be developed at a density that achieves good design and does not compromise the distinctive character of the local area. In urban areas, residential development should achieve a minimum density of 40 dwellings per hectare. Proposals that fail to make efficient use of land for housing, having regard to the character and location of the area may be refused.

Local residents have raised concerns that the proposed development would not be in keeping with the neighbouring properties and in particular, that the proposed eaves height would be excessive compared to that at no. 14 Chalky Bank.

Chalky Bank is a residential street which is steeply sloping and curves around. There are a variety of dwelling types and styles, but in the vicinity of the application site, two storey, detached dwellings predominate. However, no. 16 Chalky Bank is a detached bungalow and no. 14 Chalky Bank is a two storey, semi-detached dwelling.

The application property is a highly visible feature in the street scene;



View from the north



View from the south east

It should be noted that the general design approach, i.e. that a detached, two storey dwelling could be accommodated within the side garden of no. 14 Chalky Bank was considered acceptable when planning permission was previously granted at the application site (under 20180387). The reasoning for this is set out in the delegated report for that application (Appendix 1).

The current proposal seeks to amend the approved proposal with an increase in the height of the building overall and alterations to the roof design, first floor layout and loft layout. The dwelling would be located in the same position within the plot and the ground floor and external layouts would be unchanged. As these aspects of the proposal remain consistent and there have been no significant changes in design policy, then it is considered that the general design approach remains acceptable. Therefore the following discussion will focus on the appropriateness of the proposed alterations to the height and roof of the proposed dwelling.

The proposed alterations would detract from the visual amenities of the building and look out of place when compared to the proportions and design of no. 14 Chalky Bank. The eaves at no. 14 are directly above the first floor windows and the roof appears proportional to the brickwork of the building. However the proposed building has an excessive amount of brickwork above the first floor windows and the overall proportion of roof to brickwork results in the property looking bottom heavy. The proposed dormers would draw attention to this unusual roof design, would add bulk to the side roof profile and would be highly visible above the bungalow at no. 16 Chalky Bank, further detracting from the appearance of the building. In addition, the proposed velux windows would be large features within a relatively small roof slope and be highly visible in the street scene, which would be detrimental to visual amenity.

The proposed external facing materials would be mixed red bricks with light grey tiles. The partially constructed building has brickwork that does not look out of place in the surrounding area. However there are no existing properties with grey tiling. Therefore any planning permission granted would be conditioned to require the submission and approval of the facing materials for the proposed roof and dormers.

No details of the proposed landscaping for the application site have been provided. Therefore any planning permission granted would be conditioned to require the submission and approval of this information.

Overall, it is considered that the proposed development, by reason of its design, form and appearance, would be out of character with the existing building at the application site and its surroundings and would be detrimental to the appearance of the street scene. As such, the proposal would be contrary to paragraph 130 of the NPPF 2021 and Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

The proposed alterations to the design of the application property (compared to that granted under 20180387) would result in an additional bedroom in the loft space and a reduction in the size of a first floor study. The new bedroom would mean that the property would be able to accommodate six people in three bedrooms, over three floors.

All the proposed bedrooms would have floor areas and widths in excess of the minimum requirements of the NDSS and the total floor area of the proposed dwelling would be in excess of the minimum requirement for a three bedroom, six person, three storey dwelling in the NDSS.

The proposed private garden areas for the new dwelling and the existing dwelling at no. 14 Chalky Bank would be in excess of the minimum requirements set out in the RLG for dwellings with three bedrooms.

The submitted plans show sufficient and accessible refuse storage provision within the rear gardens of the existing and proposed properties, which would be satisfactory.

Overall the proposed development would provide a good standard of living for future occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of surrounding occupiers.

The closest residential properties to the application site are nos. 14 and 16 Chalky Bank (located immediately to the north and south respectively). Nos. 3 - 7 Chalky Bank are located to the east, across the roadway and nos. 392 – 396 Wrotham Road are located immediately to the west.

It is noted that local residents have raised a number of concerns relating to the adverse impacts of the proposed development on the residential amenity of surrounding occupiers.

The proposed development would increase the amount of bedrooms at the application property above that granted under planning permission 20180387 and as such, there would be an increase in the level of residential activity associated with the dwelling, potentially causing adverse noise/disturbance/pollution impacts to existing occupiers. However in this existing residential environment, it is considered that the level of noise/disturbance/pollution associated with one, three bedroom dwelling would not be so significant as to warrant the refusal of planning permission.

The proposed development would result in a higher roof and two dormer windows and two velux windows being located in the side roof slopes of the application property (when compared to the design granted under 20180387). As such, there would be potential for adverse overlooking, overshadowing and overbearing impacts to surrounding occupiers.

No. 16 Chalky Bank is a detached bungalow, which is inset from the boundary of the application site by some 2 metres and is positioned at a slight angle. It has no windows in the side elevation that faces the application site and its garage is located closest to the application site boundary.

Due to the design of the proposed development (including that the dwelling would be single storey closest to the side boundary) and to the layout and orientation of the no. 16, there would be no adverse overshadowing or overbearing impacts to the occupiers of that dwelling. However, by virtue of the inclusion of dormer windows in the proposed side roof slope facing no. 16 Chalky Bank, the proposed development would cause adverse overlooking impacts and an unacceptable loss of privacy from the private garden area of that property.

No. 14 Chalky Bank is a semi-detached dwelling with single storey rear extension. The side flank wall of no. 14 has two ground floor windows (serving non habitable rooms, one being a kitchen and the other a toilet) and at first floor, there is a window which serves a staircase/landing (another non-habitable room).

Due to the design of the proposed development and to the layout and orientation of no. 14 Chalky Bank, there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of that property. It is noted that the proposed velux windows would only offer very oblique views towards the private garden area of no. 14 and that the existing windows in the side elevation of no. 14 are all to non-habitable rooms and as such, would not be significantly adversely affected by the loss of natural light or outlook caused by the proximity of the proposed development.

It is noted that the proposed dwelling would be taller than that approved under planning permission 20180387 but it is considered that the increased height would not cause any significant adverse overshadowing or overbearing impact to either no.14 or no. 16 Chalky Bank.

The properties located to the rear of the application site are located in excess of 33 metres from the rear boundary, whilst the properties located opposite the application site to the front are located in excess of 21 metres from the proposed front elevation. Due to the separation between the buildings and the design of the proposed extension, there would be no adverse overlooking, overshadowing or overbearing impacts to any of these occupiers.

Overall it is considered that the proposed development, by virtue of the inclusion of dormer windows in the side roof slope and its proximity to the boundary with no. 16 Chalky Bank, would lead to a detrimental level of overlooking and an unacceptable loss of privacy from the private garden area of that property. The proposal would therefore be detrimental to the residential amenity of the occupants of no. 16 Chalky Bank and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 and Paragraph 130(f) of the National Planning Policy Framework (2021).

Parking and Highways

Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies T1 and P3 of the Gravesham Local Plan First Review November 1994 require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

Local residents have raised concerns that the proposed development would not provide sufficient or adequately sized vehicle parking.

According to the Borough Council's adopted Vehicle Parking Standards, a three bedroom dwelling should have two vehicle parking spaces and according to the KCC Residential Dropped Kerb Guidance and Self-Assessment document, parking spaces located perpendicular to the roadway should be a minimum of 2.4 metres (width) by 4.8 or 6 metres (depth). Six metres depth would be required if the space is in front of an access door or garage.

The GBC Highways Officer has not raised an objection to the proposal but requires the provision of two vehicle parking spaces each for the new dwelling and the existing dwelling, three cycle spaces for the new dwelling and a widened vehicle crossover. Sufficient space would be available within the rear garden for cycle parking. Details of the cycle spaces could be submitted pursuant to a condition attached to any planning permission granted and the provision and permanent retention of the parking/crossover can be subject to conditions also.

The proposed dwelling would have three bedrooms and parking would be available on the site frontage for two vehicles. Parking would also be available for two vehicles on the frontage of no. 14 Chalky Bank.

Overall, the proposed vehicle parking would be appropriate in terms of capacity and would have sufficient size to accommodate vehicles. Appropriate cycle parking and access to the frontage parking spaces can be secured by condition. Therefore the proposed development would not be detrimental to highway safety and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy 2014 and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994).

Ecology and Biodiversity

Paragraph 180 of the NPPF 2021 states that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or as a last resort, compensated for, then planning permission should be refused.

Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 states that sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites. It also states that, where a negative impact on a protected or priority habitat/species cannot be avoided, compensatory provision will be required.

The application site falls within 6 km of the Thames Estuary and Marshes Special Protection Area (SPA), classified in accordance with the European Birds Directive, which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. The site is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site) and is within a Site of Special Scientific Interest Impact Risk Zone.

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 Borough Council 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 6 km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) tariff payment (currently £275.88 per dwelling).

The proposed development would result in the creation of one new dwelling and as such, additional recreational activity would result. No suitable planning obligation or bespoke mitigation scheme has been submitted and no tariff payment has been made. As such, there would be no mitigation of the impacts of the additional recreational activity and the consequent adverse impact on biodiversity. As such, the proposed development would be contrary to Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 and to paragraph 180 of the NPPF 2021.

Any Other Material Planning Considerations

Local residents have raised a number of concerns, the majority of which have been covered in the above discussion. The outstanding issues are summarised and commented on as follows;

- The floor area of the room in the loft space could allow it to be subdivided to create two extra bedrooms, five in total – *due to the available headroom in the proposed loft area, it would not be possible to provide more than one bedroom.*
- Queries how the proposed parking would work as two spaces are located at the neighbouring property – *the parking would provide two spaces for the proposed dwelling and two spaces for the existing dwelling at no. 14 Chalky Bank.*
- The building works have adversely impacted on the enjoyment of the garden at no. 16 Chalky Bank (scaffolding and damage to boundary treatments) – *this is a civil matter that should be addressed between the landowners and therefore it is not a material planning consideration.*
- The abandoned site is an eyesore – *noted, the applicant will be encouraged to complete an appropriate development as soon as possible.*

The application site is located within Groundwater Source Protection Zone 2, an area of multi-period archaeological potential, the Lower Thames Crossing (LTC) Safeguarding Zone and a smoke control area.

However, as the proposed development is within the confines of an existing residential garden and the groundworks are essentially complete, then it is considered that there would be no adverse impacts to any archaeological interests, groundwater or the LTC. With regard to the smoke control area, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted.

Conclusion & Recommendation

The Borough Council cannot currently demonstrate a five-year housing land supply and accordingly, the presumption for sustainable development as outlined in paragraph 11(d)(ii) of the NPPF is applicable. This states that planning permission should be granted for residential development unless the benefits of the proposal are significantly and demonstrably outweighed by the harm.

The proposal would deliver a suitably located dwelling to the local housing stock and would boost the supply of dwellings in the Borough. This would generate both social and economic benefits, with economic benefits accrued through the construction phase and subsequently, through the reliance of future occupiers on local facilities and services. However, any economic benefits arising from the construction and occupation of the development would be limited by reason of the scale of the proposal and be relatively localised in impact.

The proposal would provide sufficient and appropriate vehicle and cycle parking, such that there would be no detriment to highway safety and the proposal would provide good living conditions for future occupiers, such that there would be no adverse impacts to the residential amenity of future occupiers.

These benefits are attributed minor weight.

Nonetheless, the proposed development, by reason of its design, form and appearance, would be out of character with the existing building at the application site and its surroundings and would be detrimental to the appearance of the street scene. As such, the proposal would be contrary to paragraph 130 of the NPPF 2021 and Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

The proposed development, by virtue of the inclusion of dormer windows in the side roof slope and its proximity to the boundary with no. 16 Chalky Bank, would lead to a detrimental level of overlooking and an unacceptable loss of privacy from the private garden area of that property. The proposal would therefore be detrimental to the residential amenity of the occupants of no. 16 Chalky Bank and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 and Paragraph 130(f) of the National Planning Policy Framework (2021).

The proposal fails to safeguard biodiversity and fails to secure a contribution towards strategic mitigation measures within Special Protection Areas. Therefore the development is contrary to Section 15 (specifically paragraphs 180 and 181) of the NPPF 2021 and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).

These harms are attributed significant weight.

On balance, it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the significant harms and planning permission should be refused.

The existing breaches of planning control at the application site should be referred back to the GBC Planning Enforcement Team for further investigation.

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
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Signed:	K Joyce	Signed:	
Dated:	05 April 2023	Dated:	05 April 2023