

Delegated Report

Planning Application

Planning Application No: 20231049

Location: Cherry Dene, Norwood Lane, Meopham, Gravesend DA13 0YE

Description: Erection of two detached houses with associated car parking, cart lodge car port and new entrance drive.

Applicant: Mrs Poh Ean Ng

Site Visit Date: 2 May 2023

Submitted Documents/Plans

Application form

Drawing no. ADP23/P102/07 (proposed cartlodge and boundary treatment plans and elevations)

Drawing no. ADP23/P102/06 (proposed CD02 elevations)

Drawing no. ADP23/P1-2/05 (proposed CD02 floor plans)

Drawing no. ADP23/P102/04 (proposed CD01 elevations)

Drawing no. ADP23/P102/03 (proposed CD01 floor plans)

Drawing no. ADP23/P102/01 (site location plan)

Drawing no. ADP23/P102/08 (proposed 3D visuals – approach)

Drawing no. ADP23/P102/11 (proposed 3D visuals – CD01 and CD02 views)

Drawing no. ADP23/P102/09 (proposed 3D visuals – CD01)

Drawing no. ADP23/P102/12 (proposed 3D visuals – internal views)

Drawing no. ADP23/P102/10 (proposed 3D visuals – CD02)

Drawing no. ADP23/P102/14 (existing block plan)

Drawing no. ADP23/P102/02A (proposed block plan)

Drawing no. ADP23/P102/13A (ground plan layout)

Design and Access Statement

Ecological Impact Assessment

Arboricultural Impact Assessment and Method Statement

Arboricultural Constraints Plan

Root Protection Plan

Soft Landscaping Proposals

Relevant Planning History

19890190	Outline application for erection of three detached houses with garages incorporating the construction of a new vehicular access drive and new vehicular access onto Norwood Lane.	Refused	02.05.1989
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Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development

- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network

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

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

National Planning Policy Framework (2023)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment

Given Gravesham's current inability to demonstrate a 5 year housing land supply (a 3.27 year supply has most recently been calculated within the statement published [here](#)), 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. This requires that in regard to housing development, planning permission should be granted unless:

- “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
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

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

- Habitats sites (and those sites listed in NPPF paragraph 181)
- Sites of Special Scientific Interest;
- Green Belt,
- Local Green Space,
- Areas of Outstanding Natural Beauty
- Irreplaceable habitats;
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 68); and

- Areas at risk of flooding or coastal change.

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

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);
- Householder Extensions/Alterations Design Guide (2021); and
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Consultees

KCC Archaeology

The site lies within an area of multi-period background archaeological potential. However, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

KCC Biodiversity

We have reviewed the ecological information submitted by the applicant and advise that sufficient ecological information has been provided.

We have taken this view as the site is largely a well managed lawn and the mature trees on site will be retained.

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. As such, if planning permission is granted, we advise that an ecological enhancement condition is included.

We recommend the following wording:

Within 3 months of works commencing an ecological enhancement plan must be submitted to the LPA for written approval. It must demonstrate what measures will be incorporated in to the site to benefit biodiversity. This must include native species planting and enhancement features integrated within the buildings and within the wider site. The plan must be implemented as approved.

Lighting

Lighting can have a negative impact on nocturnal animals (including bats) and therefore if planning permission is granted there is a need for a lighting condition to be included if planning permission is granted.

We recommend that the condition wording must include the following:

- Plan showing the locations of the lights
- Lights must be downward facing

- Lights must be on a motion sensor

GBC Environmental Protection

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

Code of Practice on Construction and Demolition: Due to the proximity of surrounding residential premises, this would be required in order to minimise the impact due to noise and dust from the groundworks, demolition of existing structures and construction work. There must be no burning on site whatsoever.

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). This is particularly important due to the rural area.

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. 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.

GBC Waste

I have reviewed the above planning application and I have the following comments.

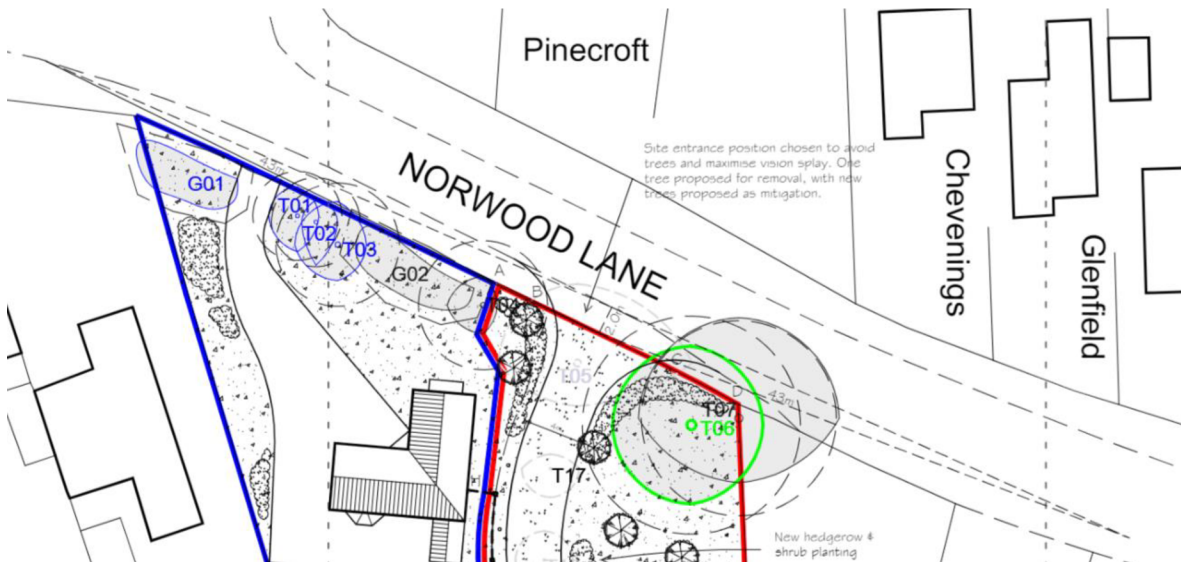
- Each property will require storage space for the following bins
 - Refuse - 1 x 180ltr bin grey body and lid
 - Recycling - 1 x 240ltr bin grey body and green lid
 - Food Waste - 1 x 23ltr bin black body and orange lid with an individual 5ltr caddy per property
- The bins will be emptied on a fortnightly basis and they will be collected from Norwood Lane, it will be the home owner's responsibility to ensure the bins are placed at the agreed collection point.

GBC - Highways Officer

This application requires very careful consideration, particularly when previous advice has not be followed.

(A) Pre-advice for sight lines *Item 5. On comments given against application PRE20230098 Sight lines should be 43m x 2.4m x 43m at any new access and shown on a suitable drawing. This is appropriate for the 30mph speed limit Norwood Lane is subject to in this section of road.*

This compares to sight lines shown on the drawing of 43m x 2m x 43m



Drawing ADP23/P102/02 Site Layout. Current application 20231049.

Manual for Streets, which is accepted as undergoing revision but not yet published, is the guide that should be used when considering sight line requirements at junctions, which includes accesses. On page 92 paragraph 7.7.6 states,

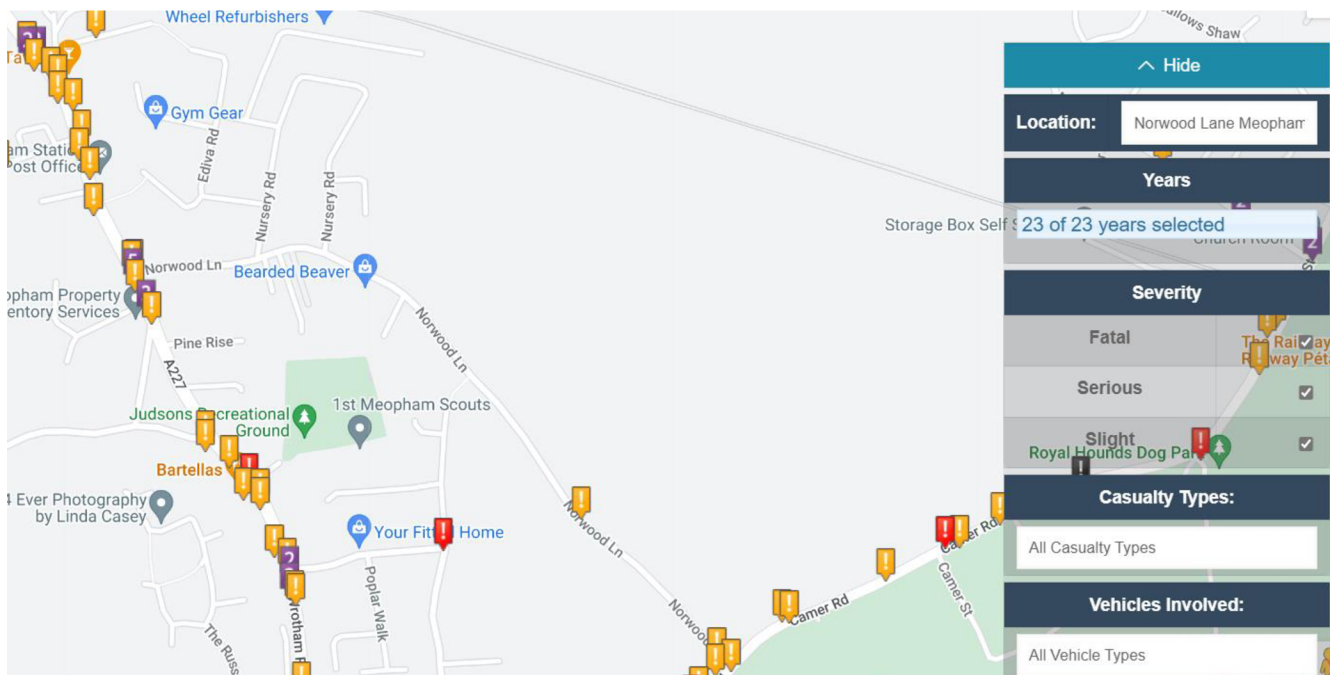
7.7.6 An X distance of 2.4 m should normally be used in most built-up situations, as this represents a reasonable maximum distance between the front of the car and the driver's eye.

It is followed by paragraph 7.7.7

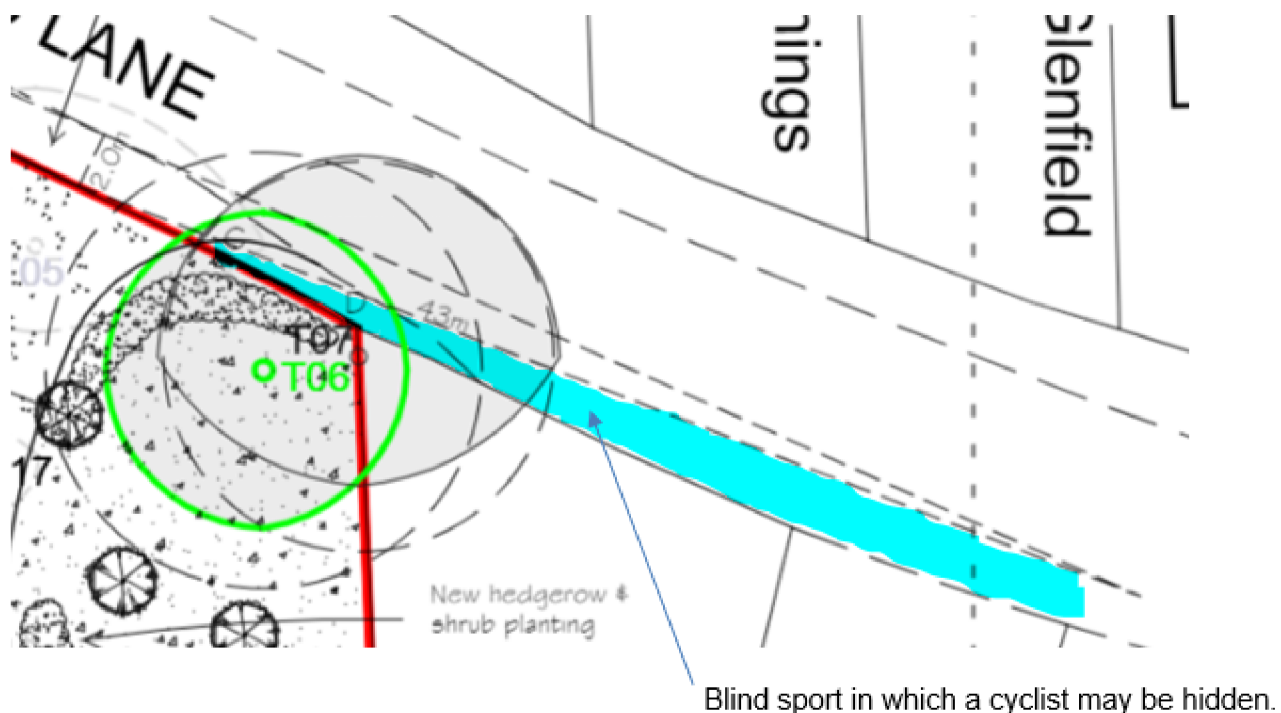
7.7.7 A minimum figure of 2 m may be considered in some very lightly-trafficked and slow-speed situations, but using this value will mean that the front of some vehicles will protrude slightly into the running carriageway of the major arm. The ability of drivers and cyclists to see this overhang from a reasonable distance, and to manoeuvre around it without undue difficulty, should be considered.

The 'X' distance is the distance measured from the edge of highway along the centre line of the driveway and gives an approximation of where a driver may be expected to be seated when exiting the drive.

Norwood Lane is an unclassified linking A227 Wrotham Road with Green Lane which is 'C' classified and is subject to a 30mph speed limit within the built up area. The road does not have the benefit of street lighting, there are no details of any injury accidents being recorded in the area on the crashmap data base. <https://www.crashmap.co.uk/Search>



However, despite what may exist elsewhere in the road, it does not mean the situation should be compounded by permitting a substandard access. It should also be noted that even if the 2 metre 'X' distance was considered acceptable, this would create a blind spot in which cyclists could be hidden to the detriment of highway safety.



Please note that Local Transport Not 1/20 gives the following stopping sight distances for a cyclist.

Table 5-5: Stopping sight distances

Design speed (kph)	Minimum stopping sight distance (m)
40	47
30	31
20	17

Note 40kph equates to 25mph whilst 30kph is approximately 19mph, not unreasonable speeds for Norwood Lane given its alignment. It does show that a cyclist does require a greater distance to stop than a motorist which isn't surprising.

Given the emphasis on active travel and the fact that the Highway Code gives priority to cyclists in the hierarchy of road uses over motorists.

“Rule H3 - Rule for drivers and motorcyclists

You should not cut across cyclists, horse riders or horse drawn vehicles going ahead when you are turning into or out of a junction or changing direction or lane, just as you would not turn across the path of another motor vehicle. This applies whether they are using a cycle lane, a cycle track, or riding ahead on the road and you should give way to them.

Do not turn at a junction if to do so would cause the cyclist, horse rider or horse drawn vehicle going straight ahead to stop or swerve.”

It is essential that any driver emerging from the access has adequate visibility to detect an approaching cyclist.

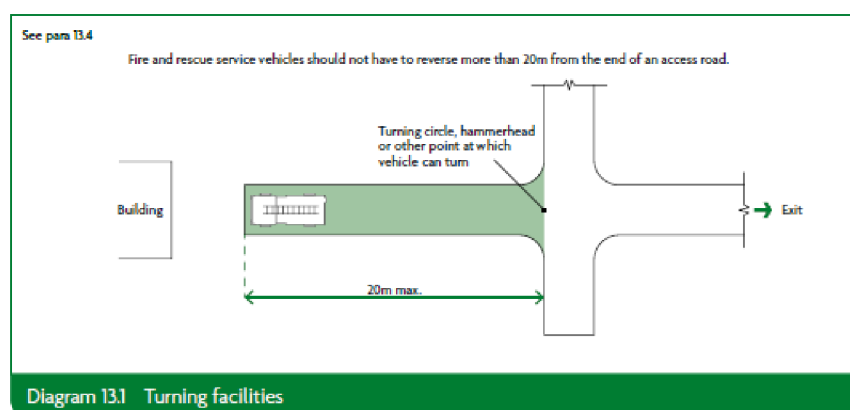
It is therefore considered appropriate that sight lines of 43m x 2.4m x 43m should be provided in the interests of road safety at any new access.

- (A) Given the requirements regarding fire access in the Building Regulations, the applicant needs to demonstrate that a Fire Engine can turn at the first new dwelling to ensure a fire appliance does not have to reverse more than 20 metres and get within 45 metres of all points inside the dwelling house.

Section 13: Vehicle access

Provision and design of access routes and hardstandings

- 13.1** For dwellinghouses, access for a pumping appliance should be provided to within 45m of all points inside the dwellinghouse.
- 13.2** For flats, either of the following provisions should be made.
- Provide access for a pumping appliance to within 45m of all points inside each flat of a block, measured along the route of the hose.
 - Provide fire mains in accordance with paragraphs 13.5 and 13.6.
- 13.3** Access routes and hardstandings should comply with the guidance in Table 13.1.
- 13.4** Dead-end access routes longer than 20m require turning facilities, as in Diagram 13.1. Turning facilities should comply with the guidance in Table 13.1.



This requires a Tracked/Swept Path drawing for an appropriate vehicle.

It is essential that this turning area should be kept clear of parked vehicles as it will potentially be used by delivery and other visiting vehicles, to avoid long reverses. The current design does not appear to ensure this, even if it is achievable.

- (A) With regards to cycle parking the proposed provision of 2 cycle parking spaces is inadequate as it does not comply with the requirements of K.C.C. SPG4 adopted by Gravesham Borough Council of 1 cycle parking space per bedroom.

Minimum Cycle Parking Standards

Individual residential dwellings ⁽¹⁾	1 space per bedroom
Flats & maisonettes ⁽²⁾	1 space per unit
Sheltered accommodation ⁽²⁾	1 space per 5 units
Notes:	1. Cycle parking provision should normally be provided within the curtilage of the residential dwelling. Where a garage is provided it should be of a suitable size to accommodate the required cycle parking provision. 2. Parking provision should be provided as a secure communal facility where a suitable alternative is not available.

KCC SPG4.

I therefore recommend refusal of this application for the following reasons.

1. Inadequate sight lines at the access. In the interest of road safety.
2. No obvious on site turning for a fire appliance or delivery vehicles. Does not conform to Building Regulations and in the interests of road safety. (Need for a long reverse onto or off of the highway)
3. Inadequate cycle parking. Does not conform to adopted guidance.

Neighbouring properties

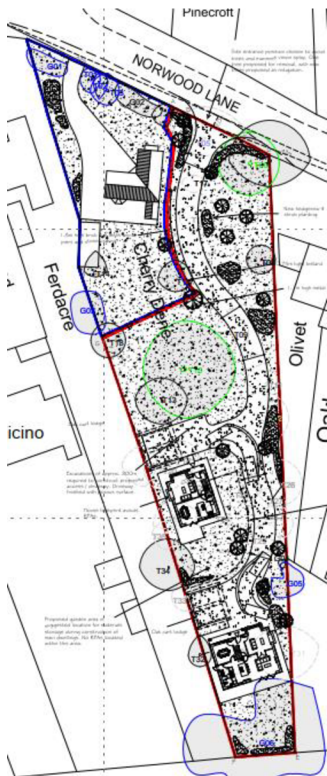
The application has been advertised by site notice and individual letters to six neighbouring properties. 16 letters of objection have been received from 12 properties. Main concerns:

- increased traffic, hazardous junction, loss of 23 trees, application is purely profit-motivated
- loss of light
- been refused before in 1989 so how can it be safe today when there are more cars
- overlooking and loss of privacy, pollution from additional cars, loss of trees, safety due to no pavement
- impact on property value, loss of vista
- overdevelopment, accessibility, noise and disruption during construction, loss of wildlife, garden grabbing
- sets a precedent
- dangerous, cars, loss of trees
- disturbance during construction work
- houses are too big for their plot, loss of outlook, loss of privacy due to tapering gardens, there is no bat survey and bats have been seen
- houses are too tall, loss of hedging for fencing
- if this is approved then there is a possibility of permission being sought to knock down cherry dene in the future and build even more houses, one bungalow would be better and if any other applications came forward then they would need to be single storey too
- light blocked to green house and garden

Officer's Analysis

Proposal

This application seeks planning permission for the erection of two detached houses with associated car parking, cart lodge car port and new entrance drive as can be seen from the block plan below:



CD01 – house to the front of the plot	CD02 – rear most house

House CS01 is the northern most house and measures approx. 9.2m in height, 7.7m in width and 9.8m in depth. The internal floor area of approx. 134sqm. It has a rear garden of approx. 10m.

House CD02 is located to the rear (south) of the site. This property will be approx. 11m wide, 9.7m high and 9.5m deep with an internal floor area of approx. 204sqm. It will have a rear garden with a depth of approx. 12m.

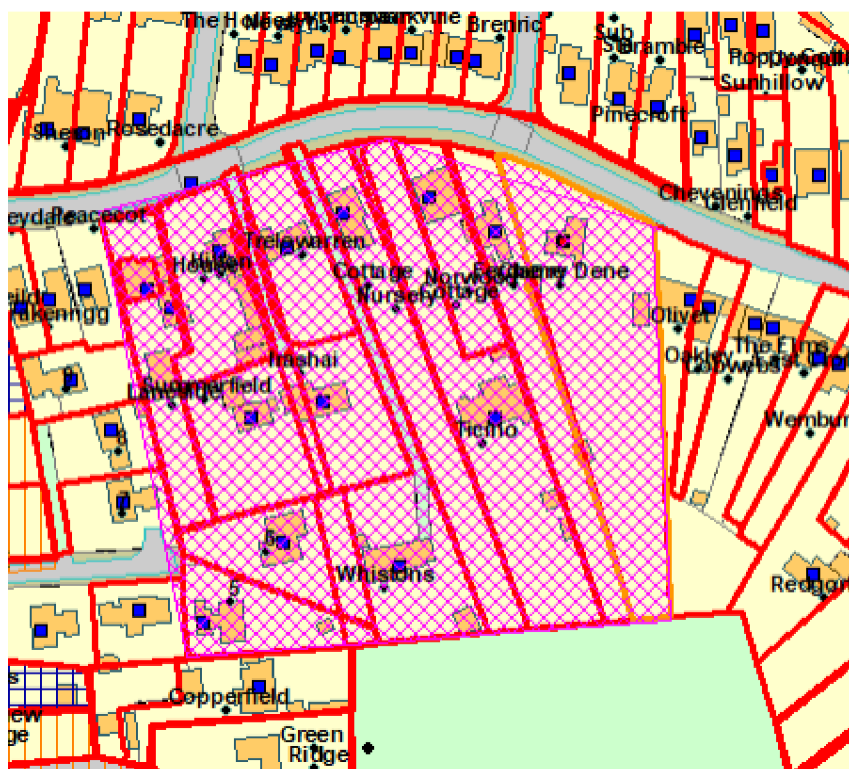
Both properties are served by a carport measuring approx. 6.8m wide, 6.1m deep and 5.5m high with a pitched roof.

In terms of character, Cherry Dene relates more to the layout of the properties to the east which are situated on larger, more spacious plots. The addition of two additional dwellings on the site will erode the spaciousness of this particular section of Norwood Lane. Whilst there are many examples of properties being built in the rear gardens of neighbouring properties, Cherry Dene has a triangular plot which differs from these other dwellings. Whilst it may be possible to accommodate two dwellings, those which are proposed are large in both footprint and height. Whilst the principle of development may be acceptable, the application needs to be assessed in terms of the policies below.

Policy CS15 states that sites will be developed at a variety of densities, depending on their location and accessibility to public transport. All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated.

Taking the sample below that relates most to the application site, the density is approx. 7.65 dwellings per hectare (dph). With two additional houses, the density of this area becomes approx. 9dph (and the density of the site 10dph). The density to the east is approx. 18dph but these houses are semi-detached. In terms of detached houses, the proposed density is not significantly higher than the surrounding area.

The density was calculated using the properties below:



Policy CS16 requires affordable housing on all new housing developments of 3 units or more on sites of 0.1ha or more in the rural area. Meopham village is considered a rural area and therefore this policy applies. The applicants were advised of this and have reduced the amount of housing to two therefore avoiding the need to provide affordable housing.

Design, Character and Appearance

The application site is located on a large plot. It would appear from the pattern of development that many of the neighbouring plots have been divided and dwellings have been built in back gardens. Ticino is an example of a two storey dwelling that has been built to the rear of Norwood Cottage.

House CS01 is the northern most house. This is the smaller of the two and measures approx. 9.2m in

height, 7.7m in width and 9.8m in depth. The internal floor area of approx. 134sqm is the equivalent of a five bedroom, eight person, three storey dwelling although it is shown to be a four bedroom dwelling. It has a rear garden of approx. 10m which, although meets the adopted residential standards, does not relate to the size of the gardens of surrounding properties, particularly those plots that have been divided and still offer generous rear gardens. In terms of design the overall height is out of scale with surrounding dwellings, which is exacerbated by the location in a rear garden. In terms of the use of suggested materials, no objection is raised as the street scene is mixed.

House CD02 is the larger of the two and is located to the rear (south) of the site. This property will be approx. 11m wide, 9.7m high and 9.5m deep. With an internal floor area of approx. 204sqm this dwelling far exceeds the residential standards for a six bed, eight person, three storey dwelling. It will have a rear garden with a depth of approx. 12m. As mentioned above a garden of this size for such a large property is out of character with the area and results in a cramped form of development. The height of the building at almost 10m is significantly higher than any other dwelling visible to the rear and will result in an incongruous and dominant form of development when seen from surrounding rear gardens and the recreational ground to the rear.

Carport are shown to the front of the dwellings at a height of approx. 5.5m which adds further build development and bulk to the site.

A 1.8m high brick wall is proposed to separate Cherry Dene from the site. No other boundary treatment details have been provided and therefore, if permission were to be granted, a condition would be recommended that this is provided.

Landscape Character

In terms of the landscape character, the proposed dwellings will be within a large settlement and therefore will not impact the wider Meopham Downs landscape and therefore there is no conflict with policy CS12 in this regard.

In terms of design, the proposed dwellings, due to their size, height and location to the rear of a plot that tapers to a point, result in an incongruous and cramped form of development out of character with the surrounding area and therefore conflict with the objectives of policy CS19 of the Gravesham Core Strategy 2014 and para. 130 of the National Planning Policy Framework 2023.

Amenity

Future Occupiers

The proposed dwellings far exceed the adopted Technical Space Standards in terms of floor area. The front lounge windows of both properties contain one window which directly overlooks the car port and the flank of its pitched roof. For both properties, which are north facing, this will result in oppressive living accommodation with limited outlook and daylight to these rooms. This arrangement further demonstrates that the proposals are cramped and overdeveloped. The habitable room window to window distance between the dwellings is over 21m and therefore each dwelling is afforded sufficient privacy in this regard. However, the distance between the first floor windows of building CD02 and the private amenity space of CD01 is only approx. 15m. The adopted standards require 21m between habitable room windows and the first 5m of private amenity space (a total of 26m) and therefore the application will result in direct overlooking between the dwellings. The rear gardens meet the adopted residential standards in terms of size however, as stated above, are out of character with the surrounding pattern of development.

Neighbouring Amenity

Ticino:

This property is located to the west of the application site. There is intervening land between the northern most dwelling and this property and, due to the orientation of this dwelling, and lack of habitable first floor flank windows, there will be no loss of privacy, outlook, sunlight or daylight to this dwelling. If an application was to be approved at a later date a condition would be recommended to ensure any flank windows serve non-habitable rooms and are fitted with obscure glass.

Ferdacre:

This property is located to the west of the application site. Due to the distance between the closest proposed dwelling and this property of approx. 50m there will be no loss of outlook, privacy, sunlight or daylight. The most usable area of the garden (first 5m) is protected by policy and this property would be over 45m away from this protected area. Therefore any loss of privacy to the remainder of the garden is not significant enough to warrant a reason to refuse the application.

Cherry Dene:

There will be approx. 45m between the closest dwelling and this property and therefore, for the same reasons as above, there will be no loss of amenity to this dwelling from the proposals.

Olivet:

The closet property proposed is CD01 which is oriented away from this neighbour. The distance between the front of this dwelling and this property is approx. 35m and therefore, for the same reasons above, there will be no loss of privacy to the most useable part of the garden. There are no habitable room windows facing onto this property and therefore there will be no loss of privacy. If an application was to be approved at a later date a condition would be recommended to ensure any flank windows serve non-habitable rooms and are fitted with obscure glass.

All other neighbours are a sufficient distance from the proposed development to suffer any significant loss of amenity in terms of outlook, privacy, sunlight or daylight.

The proposed development, due to the distances between the front windows of dwelling CD02 and the private rear garden of CD01, will result in significant overlooking to the detriment of the occupiers of this dwelling. In addition to this both lounges of the dwellings will suffer insufficient outlook and daylight due to the position and height of the proposed carports resulting in poor living accommodation contrary to policy CS19 of the Gravesham Core Strategy 2014 and para. 130f of the National Planning Policy Framework 2023.

Ecology and Biodiversity

The existing site is largely a well managed lawn and the mature trees on site are shown to be retained. Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. As such, if planning permission is granted at a later date an ecological enhancement condition should be imposed. This should require an ecological enhancement plan to be submitted to the LPA for written approval. It must demonstrate what measures will be incorporated into the site to benefit biodiversity. This must include native species planting and enhancement features integrated within the buildings and within the wider site and the plan must be implemented as approved.

Lighting can have a negative impact on nocturnal animals (including bats) and therefore if planning permission is granted at a later date there is a need for a lighting condition to be included.

Subject to the suggested conditions, no objection is raised in terms of ecology and the proposal accords with policy CS12 of the Gravesham Core Strategy 2014 in this regard.

Parking and Highways

The proposed access is located on a part of Norwood Lane where visibility is poor. There is no pavement on this side of the road, no street lighting and tall shrubbery.

The applicants have been previously advised that sight lines of 43m x 2.4m x 43m should be provided however the plans submitted show 43m x 2m x 43m. Manual for Streets is clear that, in built up areas, 2.4m should be used as this represents a reasonable maximum distance between the front of a car and the driver's eye. A figure of 2m may be acceptable in very lightly trafficked and slow-speed situations which is not the case here. This would mean the front of some vehicles would protrude slightly into the road creating a hazard for both drivers and cyclists. On this basis the proposed access is considered insufficient.

In addition to the above, the plans do not adequately demonstrate how a larger vehicle such as a fire appliance will enter and leave the site in a forward gear. No swept path analysis for such a vehicle have been provided and it would appear that the ability to turn is possible. This information is required upfront as it is not clear if a condition would ever be able to be met.

The plans do not show sufficient cycle parking. There is sufficient space on site to provide adequate cycle parking and therefore, if a permission was forthcoming, a condition to show more cycle parking would be recommended.

The proposed new access to the development, due to insufficient sight lines being provided and the likelihood of larger vehicles, particularly fire appliances, not being able to turn on site, will negatively impact the transport system in terms of highway safety and therefore conflicts with policies T1 and T5 of the Gravesham Local Plan 1994.

Other Matters

A number of objections have been received relating to the impact of the proposed development on property values which is not a material planning consideration. Other objections have related to the impact of the construction phase which is also not a material planning consideration, however, if planning permission was granted a construction environment management plan should be provided by the applicant via planning condition. An outline application was refused in 1989 for three dwellings on the site however, the policies against which this application was assessed are no longer adopted and therefore the application has to be assessed against the current local plan.

Conclusion

The proposed dwellings, due to their size, height and location to the rear of a plot that tapers to a point, result in an incongruous and cramped form of development out of character with the surrounding area and therefore conflict with the objectives of policy CS19 of the Gravesham Core Strategy 2014 and para. 130 of the National Planning Policy Framework 2023.

The proposed development, due to the distances between the front windows of dwelling CD02 and the private rear garden of CD01, will result in significant overlooking to the detriment of the occupiers of this dwelling. In addition to this both lounges of the dwellings will suffer insufficient outlook and daylight due to the position and height of the proposed carports resulting in poor living accommodation contrary to policy CS19 of the Gravesham Core Strategy 2014 and para. 130f of the National Planning Policy Framework 2023.

The proposed new access to the development, due to insufficient sight lines being provided and the likelihood of larger vehicles, particularly fire appliances, not being able to turn on site, will negatively impact the transport system in terms of highway safety and therefore conflicts with policies T1 and T5 of the Gravesham Local Plan 1994.

Recommendation:

Refuse

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

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	11 December 2023	Dated:	11th November 2023