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20th August 2024

Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
Kent DA12 1AU

Dear Sir/Madam,

A24080 – Bluebells, Willow Walk, Culverstone
Our reference – A24080/240820/GBC/SJB

On behalf of our Clients, Mr and Mrs M. Cantwell, the owners of the property, we confirm the submission online today of a Full planning application, Planning Portal reference PP-13314639, for proposed works at Bluebells Willow Walk Culverstone Meopham Kent DA13 0QS, comprising in addition to this covering letter:

- Completed application form,
- 1000 Location Plan Rev A,
- 1001 Existing Site Block Plan Rev A,
- 1010 Existing Ground Floor Plan Rev A,
- 1013 Existing Roof Plan Rev A,
- 1020 Existing Sections AA and BB Rev A,
- 1030 Existing North and South Elevations Rev A,
- 1032 Existing East and West Elevations Rev A,
- 1101 Proposed Site Block Plan Rev A,
- 1110 Proposed Ground Floor Plan Rev A,
- 1111 Proposed First Floor Plan Rev A,
- 1113 Proposed Roof Plan Rev A,
- 1120 Proposed Sections AA and BB Rev A,
- 1130 Proposed North and South Elevations Plot A Rev A,
- 1131 Proposed North and South Elevations Plot B Rev A,
- 1132 Proposed East and West Elevations Rev A,
- Preliminary Ecological Appraisal, and
- Biodiversity Net Gain Small Sites Metric (BNG).

Please note that the Preliminary Ecological Appraisal has yet to be finalised and will be submitted shortly, and that the BNG has been submitted in .pdf format but can be forwarded in the original .xlsm format if required.

This application is subsequent to the Pre-Application Enquiry, reference PRE20240126, to which a response From Gravesham BC was received on 15th July 2024. The relevant extracts from this response, together with the respective responses, comprise:

Proposal

This application for pre-application advice seeks an opinion of the acceptability of dividing the existing residential unit and plot into two independent residential units and plots.

Officer's Analysis

Principle

Given that there are many examples of plots that have been subdivided, and the site lies within the village boundaries, the principle of doing the same at Bluebells is acceptable provided that all other adopted policies are met.

Design, Character and Appearance

Design and Appearance

The properties are mixed in design but are mostly detached chalet bungalows. Willow Walk is a narrow unmade road at this end of the cul-de-sac. In terms of scale the proposed dwellings are in keeping with others that have been built. The proposed roofs are shown to sit at the same height or below the adjacent dwellings and the revised hipped design reduces the overall bulk. In terms of design the existing property is of its time however consideration should be made to the surrounding design features of neighbouring properties such as low, hipped roofs and small dormer windows. Two storey houses are not the predominant form of development and the site is located between two chalet bungalows so the proposed design should follow this pattern. Plot B especially raises concern with regards to scale and the surrounding character of the area.

Given that "In terms of scale the proposed dwellings are in keeping with others that have been built. The proposed roofs are shown to sit at the same height or below the adjacent dwellings and the revised hipped design reduces the overall bulk." and, particularly, that the Applicant does not wish the use of the first floor accommodation to be comprised by the sloping and significantly reduced clear ceiling heights arising from a chalet bungalow form of development, the submitted proposals now include wall dormer windows to the front and rear elevations, of a size and scale that reflects the character of the adjoining and neighbouring properties.

Landscape Character

In terms of impact on the landscape, the development will be limited to the plot within a wider residential area and therefore will not be read within the wider context. No objection is raised.

Amenity

Future Occupiers

Plot A.....It is not good practice to have habitable room windows in the side of dwellings as, quite often, they face onto boundary treatment or a neighbour which limits outlook and daylight. I note that there are existing windows in the northwest flank which currently serve two bedrooms and these will serve a living room. As this is an existing situation no objections are raised. However, two bedroom windows are proposed at first floor in the same flank. The outlook to these windows will be restricted by the flank of the neighbouring property which will result in poor outlook. The internal layout at first floor should be reconsidered to ensure habitable room windows are located to the front and rear of the property.

The submitted proposals include a Plot A first floor layout that has been amended in response to these comments.

Neighbouring Amenity

The first floor flank windows of plot A have the potential to overlook the neighbouring property or result in perceived overlooking. Windows at first floor within side elevations should be fitted with obscure glass and fixed shut however this would not be acceptable for bedrooms as they would not offer outlook or a means of escape. Windows in flank elevations should serve bathrooms and/or hallways rather than habitable rooms.

Again, the submitted proposals include a Plot A first floor layout that has been amended in response to these comments.

There are a number of windows in the south eastern flank at ground floor which are to serve habitable rooms. It is noted that there are windows opposite in the neighbouring flank wall which are fitted with obscure glass and therefore the proposed windows would not result in direct overlooking. All habitable windows at first floor are located to the front and rear and those windows proposed in the flanks can be fitted with obscure glass and fixed shut.

Due to the path of the sun and the orientation of the two dwellings there will be no significant loss of sunlight or daylight to any neighbouring properties.

In the event of a planning application being submitted a section drawing should be included to show how the rear terraces relate to the neighbouring sites. Rear terraces, depending on their heights can result in the overlooking of neighbouring gardens and this should be avoided.

The submitted drawing number 1132 Proposed East and West Elevations Rev A provides this information.

Ecology and Biodiversity

Potential loss of biodiversity is likely to arise from the laying of new driveways and consideration should be made to providing planting to the front to mitigate this loss.

The Preliminary Ecological Appraisal, and the submitted BNG Metric and respective drawings provide this information.

Highways & Parking

The proposal will involve an additional access. The following document is informal guidance for front driveways. It explains the importance of retaining greenery to the front of dwellings both in terms of biodiversity and also character and appearance. These documents also explain the amount of space required for a drive, parking standards and visibility splays.

The submitted drawing number 1101 Proposed Site Block Plan Rev A confirms fully compliant proposals including additional soft landscaping.

Summary

The principle of the proposed development is acceptable in policy terms however some further consideration should be given to the proposed design to ensure the dwellings are in keeping with the surrounding area and also the internal layout to avoid habitable room windows being located to the sides of the dwellings.

The submitted proposals are amended to ensure that the dwellings are in keeping with the surrounding areas and to avoid habitable room windows being located to the sides of the dwellings.

Subsequent to the Pre-Application Enquiry response, a consultation response for Kent County Council (KCC) was received on 31st July stating:

Ecological Impact Assessment Required

Habitats and features, including Round Wood ancient woodland and a tiled building potentially suitable for bats, are present on and around the site, indicating ecological value and the potential for protected species presence that must be taken account of in the planning decision of a full application. As such, an Ecological Impact Assessment (EclA) should be undertaken by a suitably qualified ecologist¹, in accordance with good practice guidelines². The EclA will be based on final designs, and include the following:

- *Details of the impacts of development proposals on the ecological baseline established via Preliminary Ecological Appraisal (PEA) and any necessary additional surveys undertaken;*
- *Details of any appropriate and achievable ecological mitigation and/or compensation measures;*
- *Details of ecological enhancement measures, and;*
- *Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.*

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA should be submitted with any full planning application. This is in alignment with paragraph 99 of ODPM 06/2005, which states "it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the

decision". The submission must provide appropriate and achievable mitigation measures for any identified ecological impacts.

Again, the Preliminary Ecological Appraisal, and the submitted BNG Metric and respective drawings provide this information.

The current proposals have also been developed in direct and specific response to this Pre-Application Enquiry response and with due regard and reference to similar and comparable planning consented proposals for properties in the immediate area, are wholly compliant with national and local planning policy, with no detrimental impact on any adjoining property and, as such, should therefore be considered favourably.

Should there be any queries or concerns with any aspect of the submitted revised proposals, we would be pleased to review the proposed development with yourselves in order to achieve an agreed and acceptable proposal prior to the determination of this application.

The respective application fee of £578 and the Planning Portal service charge of £70, both including VAT, will be paid separately and directly by the applicant.

We would be pleased to receive the following from you:

- Confirmation of receipt of this application, its validity, registration and that no further information is required,
- A receipt for the application fee,
- Confirmation of the timescale for the formal response to this application.

We look forward to your acknowledgement of receipt of this application at your earliest convenience.

Yours faithfully



Steve Baker
BA(Arch)(Hons) B.Arch(Hons)(Reilly) ARB RIBA

Principal

For and on behalf of Steve Baker Architect

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cc – Mr and Mrs M. Cantwell

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