

Our Ref: 26378/ch

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29 July 2026

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Gravesham Borough Council
Planning Department

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Dear Sir/Madam,

**Former St Josephs Convent Preparatory School, Gravesend, DA12 5PB
Daylight, Sunlight and Overshadowing Review**

I write on behalf of the applicant, Galliard (Gravesend) Ltd, in relation to the revised development proposals and to consider whether the amendments will materially alter the potential daylight, sunlight and overshadowing effects on the relevant neighbouring properties.

Having reviewed the proposed revisions, our assessment is to determine whether the changes are of a nature or scale that would give rise to any material differences when compared to the Approved scheme.

The review has been based on the Approved and Amended scheme information provided to us on 27 July 2026.

The site is largely vacant and is generally surrounded by one/two storey residential properties.

We understand that the site achieved planning consent on 21 November 2025 (ref. 20240013) for the conversion of the existing Victorian building into 6 flats. Demolition of existing out buildings, erection of a 3-storey medical centre. Erection of a building containing 7 flats, erection of 41 houses with associated works to include access, public open space and landscaping.

Our study has been carried out using the assessment methodologies recommended in 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BR209, 2022 edition) published by the Building Research Establishment and the RICS Professional Standard, 'Daylighting and sunlighting' (1st edition, 2012), published by the Royal Institution of Chartered Surveyors.

Planning policy and guidance

National Planning Policy Framework (December 2024)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies and how these should be applied. Chapter 11 of the NPPF, entitled "*Making effective use of Land*" promotes the effective use of land in meeting the need for homes. The document recommends a flexible approach to

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applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.

Gravesham Local Plan Core Strategy (Adopted September 2014)

The Local Plan contains the following policy which relates to the effects of development on daylight and sunlight.

Policy CS19: Development and Design Principles states that:

New development will be located, designed and constructed to:

- *Safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;*

Proposed Scheme Amendments

The amended scheme has only altered the massing of the housing units. No changes are proposed to the new build flats or the converted Victorian building flats. Following review during the detailed design phase the houses outlined in red in Figure 1 below have been redesigned, and the 4 dwellings shown in solid red hatch have been highlighted by the local authority as a potential area of concern. All of the houses have either reduced in size or remain the same as the approved scheme. The height of the proposed houses remains the same, but the footprints have reduced in some areas resulting in either no change or minor reduction in massing. In some cases, the properties have moved inwards from the boundary and further away from the neighbouring properties.



Figure 1: Site plan showing location of the amended houses

Results

When comparing the difference between the approved and amended scheme options, the latest massing is not expected to cause any additional daylight, sunlight and overshadowing effects. Overall, the changes to the massing is minor and in some areas the scheme will be marginally smaller and situated further away from the neighbouring properties. Therefore, the proposed development is considered to remain acceptable in daylight, sunlight and overshadowing terms.

Summary and Conclusion

DPR have been instructed to review the difference between the scheme which obtained planning consent in November 2025, and the amended scheme massing, which consists of minor alterations to footprint of the new build houses. The height of the houses will remain the same.

Overall, the difference between the Approved and Amended massing is small and in some areas the footprint of the houses will be smaller, and situated further away from the neighbouring properties. Therefore, when compared to the Approved massing, the Amended scheme proposals will not alter the daylight, sunlight and overshadowing effects to the relevant neighbouring properties.

In conclusion, it is submitted that the layout of the Proposed Development will remain consistent with the Council's local planning policy on daylight and sunlight.

Yours sincerely



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