



Delegated Report

Full Planning Application

Application No: 20240317

Location: 77A Windsor Road, Gravesend, Kent, DA12 5BW

Description: Conversion of garage to residential dwelling.

Applicant: Mr Abdul Ahad

Site Visit: 26 October 2024

Submitted Documents/Plans

- Application Form - dated 03 April 2024;
- Design and Access Statement - dated November 2023;
- Supplementary Information - Arboricultural Impact Assessment (ref. CAS/2021/120) by Cantia Arboricultural Services - dated October 2022;
- Supplementary Information - Site Photographs (1-5);
- Supplementary Information - 3D Visualisations (1-4);
- Supplementary Information - Pre-Application Report;
- Drawing no. 9108-001 - Existing Site Location and Block Plans;
- Drawing no. 9108-002 - Proposed Site Location and Block Plans;
- Drawing no. 9108-004 - Proposed Site Plan;
- Drawing no. 9108-100 - Existing Site Plan;
- Drawing no. 9108-101 - Existing Floor Plans;
- Drawing no. 9108-110 - Existing Elevations and Sections (Front and Side);
- Drawing no. 9108-120 - Existing Site Elevations 1;
- Drawing no. 9108-121 - Existing Site Elevations 2;
- Drawing no. 9108-200 - Proposed Site Plan;
- Drawing no. 9108-201 - Proposed Site, Floor and Roof Plans;
- Drawing no. 9108-210 - Proposed Elevations and Sections;
- Drawing no. 9108-220 - Proposed Site Elevations 1;
- Drawing no. 9108-221 - Proposed Site Elevations 2.

Relevant Planning History

Reference	Description	Decision	Decision Date
20231183	Erection of a new dwelling.	PERMITTED	08.02.2024
20191248	Erection of two storey side and rear extensions.	PERMITTED	07.02.2020
20190957	Erection of a two storey rear and side extension.	REFUSED	12.11.2019
20190764	Single storey rear extension with a depth of 4 metres, maximum height of 3 metres and eaves height of 3 metres.	PRIOR APPROVAL NOT	30.08.2019

		REQUIRED	
19880518	Outline Application for the erection of six detached dwellings and garages.	REFUSED	14.09.1988

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale & Distribution of Development
- CS10 - Physical and Social Infrastructure
- CS11 - Transport
- CS12 - Green Infrastructure
- CS14 - Housing Type and Size
- CS15 - Housing Density
- CS18 - Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

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 5 - Delivering a Sufficient Supply of Homes
- Section 9 - Promoting Sustainable Transport
- Section 12 - Achieving Well-designed and Beautiful Places
- Section 15 - Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 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)

Consultations, Publicity and Representations

External Consultees

KCC Heritage (relevant from previous application 20231183) – The site lies within an area of multi-period background archaeological potential. However, I consider it unlikely that these relatively limited proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

KCC Biodiversity – As the proposal will be purely on hardstanding/existing buildings and not be impacting any vegetation I would agree that the proposal is exempt from BNG due to the de-minimis exemption.

The legislation itself rather than the gov.uk standing advice pages I find best when looking at if an exemption applies: The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

The legislation says that the biodiversity gain planning condition will not apply where development does not impact an onsite priority habitat (this development will not) AND where proposals will affect less than 25 square metres of onsite habitat (this development affects less than 25 sq m of habitat). Additionally, the land affected has a biodiversity value of zero and mandatory biodiversity net gain is not applicable to sites which have a biodiversity value of zero. We understand no linear habitats are to be affected by proposals.

Internal Consultees

GBC Environmental Protection (Regulatory Services) (relevant from previous application 20231183) – No objection to this application. The following conditions and informatives are recommended.

- *Watching Brief:* The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.
- *Code of Practice on Construction and Demolition:* Please apply as appropriate to minimise the impact of the construction on nearby dwellings.
- *Smoke Control Informative:* The proposed development is situated in a smoke control area. As such, only authorised smokeless fuels as listed in the Smoke Control Areas (Authorised Fuels) Regulations 1991 shall be burnt or fireplaces/appliances exempted by Smoke Control (Exempted Fireplaces) Orders shall be utilised. Exempt appliances are appliances (ovens including pizza and tandoori ovens, wood burners and stoves) which have been exempted by Statutory Instruments (Orders) under the Clean Air Act 1993. These have passed tests to confirm that they are capable of burning an unauthorised or inherently smoky solid fuel without emitting smoke. They must be fitted and used according to manufacturer's instructions and they can only be used for the fuel for which they are designed. When purchasing fuels and fireplaces the applicant should clarify with the vendor their suitability with respect to use in Smoke Control Areas. For further information, including confirmation that an appliance and/or fuel is suitable for use in a smoke control area, the applicant should contact the Council's Regulatory Services air.quality@gravesham.gov.uk.
- *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.

Local Ward Councillors – No comment received.

Neighbouring properties

A notice was displayed on site 22 April 2024.

In addition, eight surrounding properties were consulted and one representation was received. The neighbour registered objection to the proposal, providing only non-material planning considerations.

Non-Material Planning Considerations:

- Loss of Property Value
- Speculation on future development on the site following this application

Please note – only the material planning considerations are relevant to this decision.

The consultation period expired 08 May 2024.

Officer's Analysis

Site Description

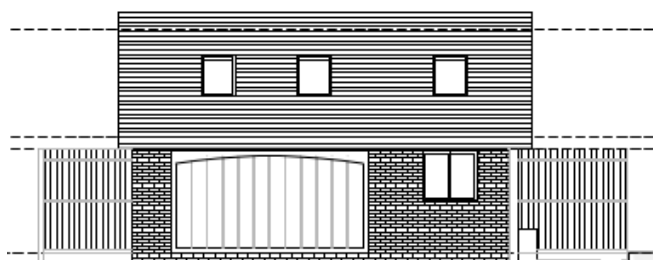
77A Windsor Road is a large detached property located on a generous plot of land, set back from the highway. The property is a backland development which was constructed in the late 1990s and lies within the Urban Area of Gravesend.



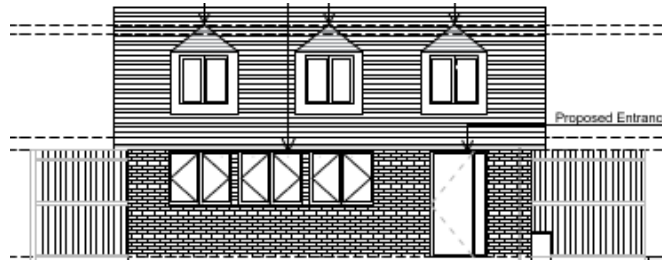
Proposed Development

This application proposes the conversion of the detached double garage into a residential dwelling. The proposal would remove the garage door and replace with three windows on the ground floor, with the new entrance on the southern side. At first floor there would be three dormer windows installed and three velux roof light windows on the rear slope.

Existing Elevations



Proposed Elevation





The proposed dwelling would have an open plan kitchen/living/diner on the ground floor, with a large hallway and storage area. At first floor there would be a double bedroom and a shower room.

Principle of Development

The principle issues for consideration with this application are as follows:

- Housing Need
- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity
- Parking and Highways
- Any Other Material Planning Considerations

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath re-emphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Carnwath as part of the Supreme Court decision stated,

“It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than “guidance” and as such a “material consideration” for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme.”

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023, it demonstrates that based on data up for the period 2022-2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council’s current inability to demonstrate a 5-year housing land 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 Gravesham’s Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2023). 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 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 at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 182)
- 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)
- 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.

The proposed development for a net increase of '1' residential units would offer a minimal contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the Development Plan and NPPF (2023) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Design, Character and Appearance

Development Plan policy places considerable emphasis on the importance of achieving high quality buildings and places. Paragraph 131 of the NPPF (2023) states that good design is a key aspect of sustainable development. Paragraph 130 of the NPPF (2023) 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 (Development and Design Principles) (LPCS) states that new development will be visually attractive, fit for purpose and locally distinctive. It also seeks to conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area, whilst ensuring that the design, layout and form of new development will be derived from a robust analysis of local context and character and make a positive contribution to the street scene, the quality of the public realm and the character of the area.

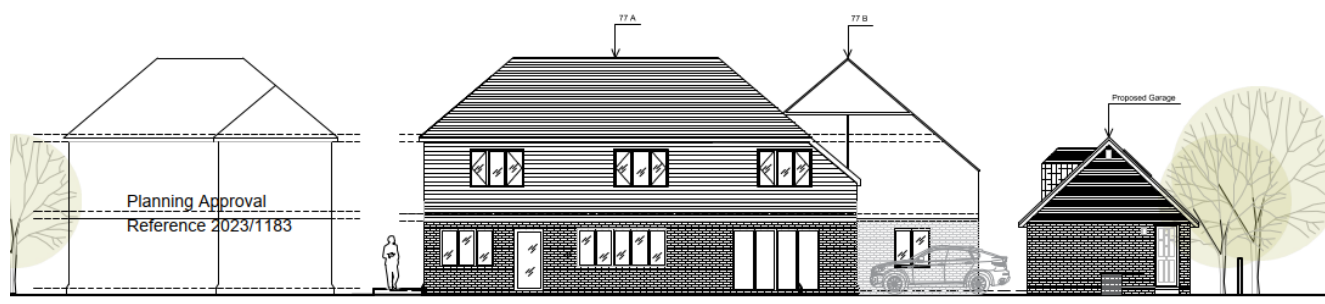
Whilst it is recognised that development which makes effective use of land should be supported (paragraph 123 of the NPPF), this comes with the proviso that it should safeguard and improve the environment and not conflict with other policies in the NPPF. Relevant to this proposal, paragraph 128 of the NPPF (2023) 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.

In a similar vein, Policy CS14 (LPCS) 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 forms a 1 bedroom detached dwelling and this would therefore be supported by Policy CS14 (LPCS), providing design and character is also acceptable.

Policy CS15 (LPCS) seeks to achieve a minimum density for residential development in the urban area of 40 dwellings per hectare, subject to the overriding consideration that it achieves good design and does not compromise the distinctive character of the area. The application site measures 0.233248 hectares; one additional dwellings on this site would fall significantly below the density target of 40 at 12.9 dwellings per hectare, and this would therefore indicate that it would be underdevelopment of the site. However, as the site is not close to the transport hub of Gravesend Town Centre (for example, Gravesend station is over 2.74km away) a lower density would be accepted in this location.

The application site is located within the wider urban boundary of Gravesend, in a residential area that comprises of two storey detached properties. As such, the predominant house types in the surrounding area are uniform in character and their plot sizes are typically fairly generous, the properties are set back from the highway with good sized rear gardens.

The lower height of the converted garage would be at odds with the prevailing character of surrounding properties on the site and the size of surrounding plots, resulting in a contrived and seemingly cramped layout in the context. While it is acknowledged the existing garage building has been in place for many years, the garage is a non-residential use and has a different character to the proposed chalet bungalow.



Moreover, there is a lack of space around the dwelling. The single storey nature of the proposed dwelling will not make a development here any less out of place and would emphasise the different character and add to the unmistakably cramped nature of the proposed site, as a bungalow generally requires a larger floor area and therefore would take up more of the site.

While it is noted that there is a bungalow located on Tree Tops which adjoins the site boundary to the west, this is an outlier within the area and does not provide justification for the proposed conversion. There is no precedent in planning and the image above clearly demonstrates the contrived scale of the proposed dwelling against the surrounding character.

The design of the proposed dwelling would remain facing brick, with the existing roof tiles to be retained, both of which match the host dwelling and the recently approved dwelling. The dormer windows are evenly spaced on the roof slope. On balance, there is no objection in isolation to the general design of the building.

Overall, whilst the proposal may seek to make a more efficient use of the site, and would provide a 1 bed dwelling, this should not be outweighed by the clear development plan objectives that include maintaining and improving the character of the area. The proposed dwelling will sit on an obviously smaller plot than its surrounding counterparts, and will result in a cramped form development of the site that would be out of keeping with the character and appearance of the layout of the properties in the immediate area. On this basis, the proposal is considered to be contrary to the requirements of Policies CS15 and CS19 (LPCS), and paragraphs 125, 128, 131 and 135 of the NPPF (2023).

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020). Moreover,

on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

The Nationally Described Space Standards (2015) sets out minimum gross floor areas for a two storey, one bedroom dwelling. These figures vary depending on the number of persons occupying the dwelling. In this case the plans demonstrate that the bedroom would be double and therefore would have a maximum capacity of 2 persons:

Bedroom(s) /Person(s)	National Housing Standard Guidance	Unit Floor space
1 (2 person)	58m ²	65m ²

Table 1 - Floor Area Breakdown

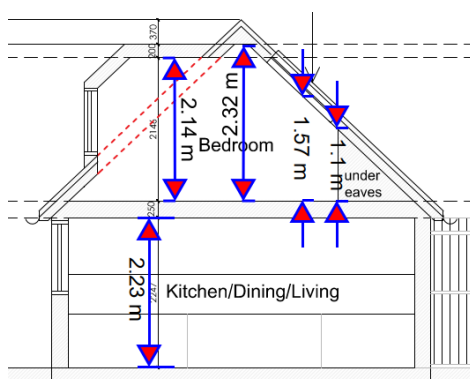
The table above demonstrates that the proposed dwelling would comply with the minimum floor space in accordance with the National Space Standards (2015). Notwithstanding this, Gravesham's RLG breaks down the measurements further, recommending minimum floor areas for specific rooms as shown in the table below. These recommended minimum floor areas have been compared to the proposed room sizes within the dwellings.

	RLG (minimum floor area)	Proposed Room Size
Lounge/Kitchen/Diner	25.2m ²	22.5m ²
Double Bedroom	11.5m ²	15.5m ²
Bathroom	3.6m ²	2.3m ²

Table 2 - Room Size Breakdown

Table 2 has been colour coded (green complies, red fails) to show which rooms within dwelling meet the guidance within the RLG. The table demonstrates that most of the rooms comply with the minimum floor area recommendations, with the exception of the bathroom. However, this room is annotated on the floor plans as a shower room, and due to a shower basin occupying significantly less space than a bath this is not considered to have any negative impact on future occupier amenity.

Notwithstanding the floor area calculations complying with the RLG, the NDSS states that a minimum floor to ceiling height of 2.3m should be provided, for at least 75% of the internal area. The section drawings provided highlight that the ground and first floors of the building fall below the 2.3m minimum floor to ceiling height and would therefore not be usable space (as demonstrated in the screenshot below). Therefore, the proposed dwelling is a cramped form of development, is substandard and would provide poor quality living environment for future occupiers.



The proposed front dormer windows are within 10m of the main dwelling, which has a two flank windows facing east. The closest window serves a bathroom and is obscure glazed, the further window is located on the front projection and serves a bedroom. The bedroom window is 17m from the front dormer windows of the proposed dwelling, which serve the bedroom. Gravesham's Residential Layout Guidelines state that a minimum habitable window-window distance of 21m should be achieved in new development to minimise direct overlooking. Therefore, the bedroom of the new dwelling would be directly overlooked by the existing property to the detriment of their amenity.

In terms of amenity space, the proposed dwelling would have garden space on both sides of the building, measuring a total area of 80m². The majority of the amenity space is located to the south (4.3m depth and 45.9m² area) and similar to the front dormer windows would be overlooked by the flank bedroom window on 77A Windsor Road. The bedroom window is 12m from the garden fence and would therefore directly overlook the garden space, removing any private amenity space for future occupiers.

The proposal is cramped onto the site and fails to provide acceptable amenity for future occupiers by virtue of substandard living accommodation as well as direct and perceived overlooking into habitable rooms and the garden areas. Therefore, by virtue of a lack of privacy the development fails to safeguard the amenity of future occupiers and is contrary to Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Existing Dwelling (no. 77A Windsor Rd)

The application property is a five-bedroom detached dwelling. The proposed development will significantly reduce the side garden area of the dwelling but would retain a maximum depth of 16m and an area in excess of 400m². Gravesham's RLG states that the minimum garden area for a five-bedroom property should be 100m² and a minimum depth of 10m. Therefore, the proposed development would safeguard the amenity of existing and future occupiers of 77A Windsor Road.

Conclusion on Future Occupier Amenity

The proposed conversion would be a cramped form of development, with habitable rooms and garden space directly overlooked. Therefore, the proposal fails to safeguard the amenity of future occupiers contrary to Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and paragraph 135(f) of the NPPF (2023) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The proposed dwelling would not have any detrimental impact on the amenity of surrounding residents in terms of light, privacy, outlook or sense of enclosure. The building will not be extended, with the exception of the dormer windows and therefore there would be no material impact on light, outlook or sense of enclosure. The position of the building in relation to the northern neighbour (no. 77B Windsor Rd), means that there would be no impact on privacy and the other neighbours are substantially over the RLG window-window distances to not be overlooked. The proliferation of properties on the site could have an increase impact on noise, however the uses remain residential and therefore this would not be sufficient grounds to refuse the application.

There was an objection received from a surrounding property, raising non-material planning considerations in the representation.

Overall, the proposal is considered to safeguard the amenity of neighbouring properties in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2023).

Parking and Highways

There are no parking or highway issues related to this proposal. The site benefits from adequate space for vehicular parking for both the existing and proposed dwellings, in accordance with Gravesham's adopted parking standards (SPG4) (2006).

The proposed dwelling is not expected to increase vehicular movements within the area significantly. As a one bedroom dwelling, based on SPG4 only one additional parking spaces are required and therefore, the impact on the highways network and traffic generation are low. As such, the proposal is in accordance with Policy CS11 (Transport) (LPCS).

Any Other Material Planning Considerations

Waste Management and Refuse

Policy CS19 (LPCS) requires new development to incorporate appropriate facilities for the storage and recycling of waste.

The plans do not demarcate a bin store nor state the quantity of bins proposed. However, there is adequate space to the front of the building to accommodate bins, which would be dragged by occupiers to the edge of the highway on collection days. Therefore, if permission were forthcoming, planning conditions could address any concerns with refuse or bins.

Ecology and Biodiversity (Bird Mitigation)

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering waterbirds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £328.27 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £328.27.

The applicant has not paid the SAMMS Mitigation Contribution Agreement and therefore fails to meet the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 185 and 187) of the NPPF (2023) and Policy CS12 (LPCS) (2014).

Biodiversity Net Gain

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

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.

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.

The proposed development would not affect 25m² of onsite habitat and does not impact an onsite priority habitat and therefore is a de-minimis exception. This has been confirmed by Kent County Council Biodiversity, who stated that *"the land affected has a biodiversity value of zero and mandatory biodiversity net gain is not applicable to sites which have a biodiversity value of zero. We understand no linear habitats are to be affected by proposals"*. Therefore, no additional information is required under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Conclusion

The application has been fully considered and is contrary to local and national planning policy.

While the proposal may seek to make a more efficient use of the site, and would provide a 1 bed dwelling, this should not be outweighed by the clear development plan objectives that include maintaining and improving the character of the area. The proposed dwelling will sit on an obviously smaller plot than its surrounding counterparts and would result in a cramped form development of the site that is out of keeping with the character and appearance of the layout of the properties in the immediate area. On this basis, the proposal is considered to be contrary to the requirements of Policies CS15 and CS19 of the Gravesham Local Plan Core Strategy (2014), and paragraphs 123, 128, 131 and 135 of the National Planning Policy Framework (2023).

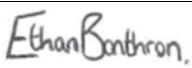
The proposal is cramped onto the site and fails to provide acceptable amenity for future occupiers by virtue of substandard living accommodation as well as direct and perceived overlooking into habitable rooms and the garden area. Therefore, by virtue of a lack of privacy the development fails to safeguard the amenity of future occupiers and is contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2023).

Lastly, the development fails to safeguard biodiversity or mitigate harm caused to the Special Protection Areas. Therefore, the development fails to comply with the requirements of the Habitat Regulations and fails to offset biodiversity loss contrary to Section 15 (specifically paragraphs 185 and 186) of the National Planning Policy Framework (2023) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Recommendation

Refusal

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

Case Officer:	Mr Ethan Bonthron	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	5 th June 2024	Dated:	06 June 2024

