



Delegated Report

Full Planning Application

Application No:	20211250
Location:	31 Waterton Avenue, Gravesend, Kent, DA12 2PY
Description:	Application for subdivision of single residential dwelling into two dwellings to create 1 no. 3 bedroom dwelling and 1 no. 4 bedroom dwelling, associated works to include a two storey rear extension, conversion of loft space with addition of a hip to gable roof alteration and rear dormers and rooflight to front roofslope, addition of external cladding and conversion of garage. Extension of vehicle crossover and removal of front garden wall.
Applicant:	Miss Sophie Dickson
Site Visit:	3 rd November 2021

Site Description

31 Waterton Avenue is a two storey semi-detached property on the Northern side of the street. The property had a two storey side extension permitted in 1990 (ref.19900328) but has no other relevant planning history. It has a hipped roof and a single storey projection at the rear.



The property benefits from a large frontage which is almost entirely block-paved, with the exception of a tree and some planting along the western boundary. It also has a garden sizeable rear garden which is long, but relatively thin.

The rear of the property is visible from the nearby cul-de-sac, The Poplars.

Submitted Documents/Plans

- Application Form - dated 24/10/2021;
- Design and Access Statement - dated 10/2021;
- Ordnance Survey Location Plan (scale - 1:1250) - received 26/10/2021;
- Block Plan as Existing (scale - 1:500) - received 26/10/2021;
- Block Plan as Proposed (scale - 1:500) - received 26/10/2021;

- Un-numbered Plan marked 'Existing and Proposed Crossover Plan and Elevation' - received 08/10/2021;
- Un-numbered Plan marked 'Plans and Elevations - for planning sheet 1 of 4' - received 08/10/2021;
- Un-numbered Plan marked '3D Views - for planning sheet 2 of 4' - received 08/10/2021;
- Un-numbered Plan marked 'Site Plan - for planning sheet 3 of 4' - received 08/10/2021;
- Un-numbered Plan marked 'Streetscape - for planning sheet 4 of 4' - received 26/10/2021.

Relevant Planning History

Application No.	Description	Status	Decision
20210071	Application for subdivision of single residential dwelling into two dwellings to create 1 no. 3 bedroom dwelling and 1no. 4 bedroom dwelling, associated works to include a two storey rear extension, two storey extension to the front elevation, conversion of loft space with addition of a hip to gable roof alteration and rear dormers and rooflight to front roofslope, addition of external cladding, conversion of garage and extension of vehicle crossover.	REFUSED	20.05.2021
20190948	Construction of a dormer extension in the rear roof slope with a hip to gable roof alteration and conversion of the dwelling into 3no. one bedroom self contained flats and 1no. two bedroom self contained flat.	REFUSED	01.11.2019
19900328	Erection of two storey side extension to form garage, enlarged kitchen and w.c. with bedroom and enlarged bathroom at first floor level.	PERMITTED	19.06.1990

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale & Distribution of Development
- CS11 - Transport
- CS12 - Green Infrastructure
- CS14 - Housing Types and Sizes
- 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 (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)

- Section 2 - Achieving Sustainable Development
- Section 5 - Delivering a sufficient supply of homes
- Section 9 - Promoting Sustainable Transport
- Section 11 - Making effective use of land
- Section 12 - Achieving sustainable development and well-designed places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- 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;
- SPG 4 - KCC Parking Standards (2006);
- Technical Housing Standards: Nationally Described Space Standards (2016);
- Householder Extensions/Alterations Design Guide SPD (2021).

Consultations, Publicity and Representations

Consultees

KCC - Highways and Transportation - The proposal does not warrant involvement from the Highway Authority. However, should permission be granted the relevant highway informative(s) should be attached to the decision notice.

GBC - Highways Officer - This is an interesting application and the proposal meets minimum car parking requirements, but I do have concerns as the photos submitted as part of the Design and Access Statement clearly shows a demand in excess of two spaces for the existing single dwelling.



Google Street View May 2019, the other images do not show such high demand for parking.

It is also noted that any extension may conflict with a street tree, although the specimen in the Google Street View images is of poor quality it does not mean the highway authority do not intend to retain or replace it.



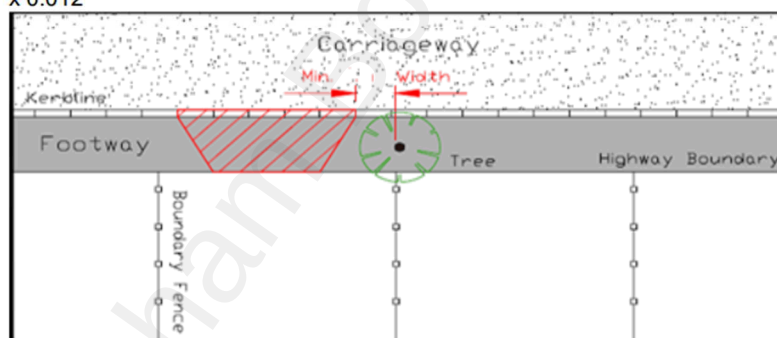
A street tree limits the possibility of what may be done in terms of a carriage crossover

8. Trees and Root Protection Calculation

Applications requiring the removal of a highway tree are likely to be refused. To avoid damage to the tree roots or rooting environment, a minimum root protection area (RPA) needs to be left undisturbed around each tree.

The following calculation will provide the radius of the RPA which should be used as the minimum distance between a tree and any construction. In certain cases it may be possible to reduce the distance based on advice from an arboriculture's.

RPA radius (m) = Stem diameter (mm) measured @ 1.5m above ground level x 0.012



Kent County Council Vehicle Crossing: - Guidance and Self-Assessment

The loss of the garage removes the potential for the existing property to securely store cycles so such storage would need to be replaced, whilst the new dwelling would require its own cycle storage to comply with the requirements of KCC SPG4

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.

From the details submitted there is no provision for cycle storage at either property, this needs to be remedied, with three spaces for the three bedroom property and four for the four bedroom one.

Whilst the proposed car parking provision complies with current guidance, the evidence suggests demand may be greater and should be accommodated in the interests of nil detriment.



Photo taken 3rd November 2021

Whilst it may be possible to extend the crossover to serve two individual drives, the street tree may prevent this and much depends on the Highway Authority's intent regarding this particular specimen. It would be better for the applicant to resolve this issue now with Kent county Council before proceeding further.



Photo taken 3rd November 2021

For the reasons given above, I consider the proposal is inadequate (cycle parking and car parking based on available evidence) and immature (until the issue of extending the crossover is clarified). I therefore recommend refusal, but if you are minded to approve, carriage crossover should be provided before any other works take place.

Neighbouring properties

A notice was displayed on site 3rd November 2021.

In addition, nine surrounding properties were consulted and six representations have been received. Each of the representations received objected to the proposal. These objections have been separated into material and non-material planning considerations (please note only the material planning considerations are relevant within the decision making process).

Material Planning Considerations:

- Parking provisions on Waterton Avenue;
- Out of character;
- Impact on the street scene;
- Overdevelopment
- Loss of light;
- Overlooking;
- Noise and disturbance from use;
- Loss or effect on a tree (the only remaining tree in the road);
- Flood Risk & Ecology.

Non-Material Planning Considerations:

- Noise from building;
- Loss of property value;
- Private issues with neighbours - damage to properties;
- Problems arising from the construction period (noise, construction vehicles).

The consultation period expired 3rd December 2021.

Preliminary Matters

The Local Planning Authority have refused two previous applications at this property for extensions and subdivision into multiple units. The most recent application proposed extensions and conversion into two dwellings; one 3 bedroom and one 4 bedroom. The application proposed *“a two storey rear extension, two storey extension to the front elevation, conversion of loft space with addition of a hip to gable roof alteration and rear dormers and rooflight to front roofslope, addition of external cladding, conversion of garage and extension of vehicle crossover”*. Planning permission was refused on the following grounds:

1. *The various extensions cumulatively result in overcomplicated staggered flat roof arrangement that is both incongruous and adds unnecessary bulk to the property which when combined is cluttered and constitutes overdevelopment of the site. As such the proposal is poor design and detrimental to the character of the street scene contrary to Policy CS19 (Development and Design Principles) of Gravesham's Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2019).*
2. *The proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development fails to comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 175 and 176) of the National Planning Policy Framework 2019 and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).*

In order to be granted permission the current application must overcome the reasons for refusal above, but also comply with local and national planning policy.

Officer's Analysis

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 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) (2021). 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); 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.

The proposed development for a net increase of '1' residential units would offer a minimal but important 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 NPPF (2021) 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.

Policy CS02 (Scale and Distribution of Development) (LPCS) prioritises development in the urban area as a sustainable location for development by bringing forward a range of suitable sites on other parts of the urban area for residential. The application site lies within the urban area of Gravesend and is not subject to any specific local planning policies or constraints that restrict the principle of development, other than general policies that seek to protect the character of the area and the amenity of existing and future residents.

It is considered that local adopted Policies CS14 (Housing Type and Design), CS15 (Housing Density) and CS19 (Development and Design Principles) (LPCS) together provide an assessment framework in line with the guidance provided by paragraph 71 of the NPPF (2021). The proposal shall be assessed against these policies in the following section reviewing the character and appearance of the scheme.

Description of the Proposal

This application proposed to extend the property and subdivide it into two dwellings. The extensions involve the erection of a part two storey, part single storey rear extension, a hip-gable roof enlargement, construction of a rear dormer and conversion of integral garage.

The screenshots below demonstrate the proposed changes to the property:



The extensions to the property have the following dimensions:

Two storey rear:

- Depth - 2.9m
- Width - 8.68mm
- Height - 6m

Single storey rear:

- Depth - 1.25m
- Width - 8.68m
- Height - 2.75m

Dormer:

- Depth - 3.95m
- Width - 8.15m
- Height - 2.2m

The two dwellings created will be different sizes, with no. 31a having three bedrooms and no. 31b having four bedrooms. The floor area of each property is:

Property	Floor Area
31a	95.07m ²
31b	113.59m ²

The principle considerations in the assessment of this application are:

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

Principle of Redevelopment

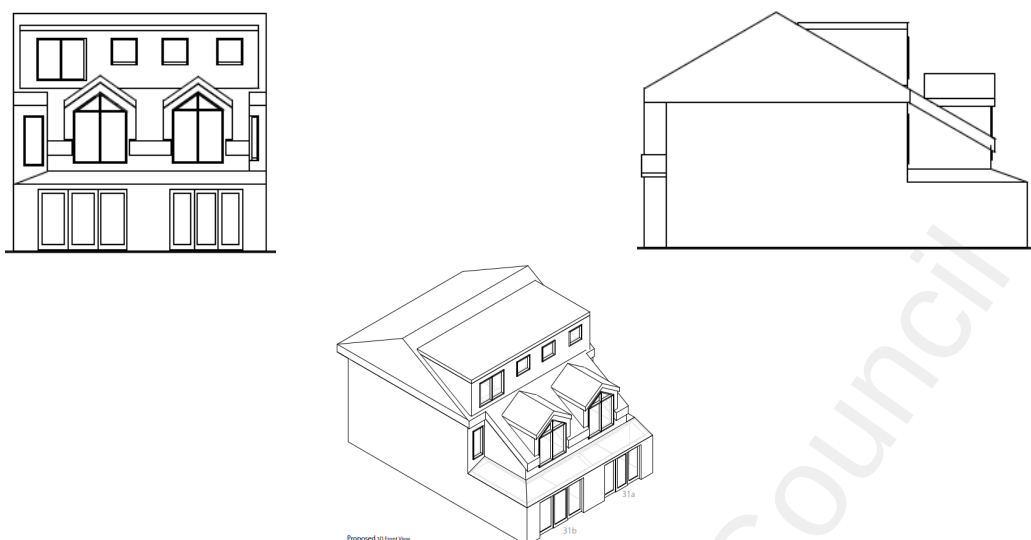
Policy CS14 of Gravesham's Local Plan Core Strategy (LPCS) (2014) and Policy H5 of the Local Plan First Review (LPFR) (1994) restrict the conversion of homes into smaller units when the property is considered an acceptable size for one family. The existing dwelling has four bedrooms and is not considered too large for single family occupation. However, the two proposed dwellings are family sized and therefore would not result in the loss of a family home.

In terms of housing density, Policy CS15 of the Local Plan Core Strategy (LPCS) states that new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. The development meets this requirement.

Design, Character and Appearance

The proposal will significantly change the visual appearance of the dwelling and is considered to be poor design and overdevelopment.

The combination of the roof alterations (hip-gable enlargement and dormer extension), two storey and single storey rear extensions create a complicated and convoluted design. The two storey rear extension involves two pitched roof gable projections to allow additional head height, which are grossly out of character with the dwelling and are incongruous additions.



Furthermore, as demonstrated in the screenshots below these gables are detached and freestanding on the roof slope, which consolidates the poor design strategy. Even though these additions are not visible from the street scene, the visual appearance at the rear is unbalanced and off-centre, overly complex and poorly designed.

It is acknowledged that the dormer has been set-down from the ridge and that the flat roof elements have been changed from the previously refused application, however the redesigned development is considered poor. Moreover, the complexity and cumulative additions proposed demonstrates that the conversion of the property is not appropriate, but also that the quantity and volume of extensions required to create space for subdivision represent overdevelopment.

The development is also considered to have a detrimental impact on the street scene. The hip-gable extension and creation of a new dwelling will have a terracing effect and unbalances the pair of semi-detached properties. Moreover, the terracing effect is emphasised by the proximity to the neighbours at nos. 9 and 10 The Poplars. The previous two storey side extension (ref. 19900328) has closed the pre-existing gap between properties, which are established characteristics of the street scene. The hip-gable extension will exacerbate this closed gap and proximity, resulting in a harmful terracing effect.



The proposed vehicle crossover extension will require the removal of an existing street tree at the front of the property. The street tree is only one of two trees on Waterton Avenue, and have been in place since at least 2008.

Google Maps Streetview (Oct 2008)



Google Maps Streetview (Apr 2021)



Even though the tree has been cut back and reduced in size significantly overtime (see comparison photographs), the images taken by the Highway Officer demonstrate that there is additional new growth, which will have a positive greening and de-urbanising influence on the street scene. As such, the potential loss of the street tree in order to widen the vehicular crossover is considered to have a harmful and urbanising impact contrary to policy. Moreover, the Highway Authority are responsible for the tree and may intend to replace it with another specimen.

The proposed extensions are overly complex, convoluted and poorly designed. The quantity of different additions required to subdivide the property is overdevelopment and the extensions will have a harmful, terracing impact, on the street scene. As such, the proposal is contrary to Policy CS19 (Development and Design Principles) (LPCS) and Section 12 (Achieving well-designed places) (NPPF).

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 two properties are mixed in terms of size, with three and four bedrooms respectively. The national housing standard guidance provides minimum gross floor areas for three storey dwellings, breaking down the number of bedrooms and bed spaces (persons). The

Flat no.	Bedroom(s) /Person(s)	National Housing Standard Guidance	Floor Area
31a	3 (4 person)	90m ²	95.07m ²
31b	4 (5 person)	99m ²	113.59m ²

Table 2 - Property Floor Area Breakdown

As shown in Table 2, if the properties are accord with the national recommendations for three storey dwellings. However, Gravesham's RLG breaks down the measurements further, recommending floor areas for specific rooms as shown in Table 3 below:

	Gravesham RLG (2020)
Living Room	13.2m ²
Kitchen/Living/Dinning	25.2m ²
Kitchen/Dining	12m ²
Bedroom (double)	11.2m ²
Bedroom (single)	6.5m ²
Bathroom	3.5m ²

Table 3 - RLG Room Size Guidance

The recommendations within the RLG have been compared to the room sizes in the proposed properties and are shown in Table 4 below. Please note the RLG does not provide specific floor areas for 'Kitchen, Living and Dining rooms, as such, these figures shown in Table 2 are sum of the Kitchen and Living/Dining rooms.

	31a	31b
Living Room	12.9m ²	-
Kitchen/Living/Dining	-	46.6m ²
Kitchen/Dining	28.5m ²	-
Bedroom 1	12.2m ² (D)	8.25m ² (S)
Bedroom 2	7.9m ² (S)	10m ² (S)
Bathroom 1	4.75m ²	5.8m ²
Bedroom 3	10.75m ² (S)	5.3m ² (S)
Bedroom 4	-	15.5m ² (D)
Ensuite	8.45m ²	8.9m ²

Table 4 - Property Floor Area Breakdown

The table demonstrates that most rooms within the two properties are in accordance with the RLG. However, a number of the bedrooms provided are shown as '(S)', which denotes that these rooms have a floor space and is only appropriate for a single bedroom. For instance with property 31b only one of the four bedrooms provided is large enough to accommodate a double bedroom and could be considered a cramped development. The undersized bedroom is an existing bedroom and is not changed as part of the development.

Nevertheless, the proposed dwellings are considered to comply with the RLG and all the habitable rooms are served by windows to provide acceptable levels of natural lighting.

In terms of the garden areas, the RLG recommends that a three bedroom property should have a garden with an area of 60m² and a depth of 10m, increasing to 100m² and 10m respectively for a four bedroom dwelling. The garden dimensions for 31a are 70m² and 17m, which accords with the RLG. Similarly, the garden dimensions for 31b are 160m² and 27m, also according with the RLG.

Overall, the proposed extensions to the property create sufficient space for the subdivision into two dwellings, which are considered to provide acceptable living accommodation and amenity for future occupiers. Therefore, the proposal is considered to be in accordance with Policy CS19 (LPCS) and Section 12 (NPPF).

Neighbouring Amenity

The development hereby proposed is not considered to impact on the amenity of any adjoining property in terms of loss of light, overlooking, sense of enclosure or outlook.

A number of representations were received from neighbouring properties. These representations all

registered objection to the proposed development and the following material planning considerations were raised:

- Parking provisions on Waterton Avenue;
- Out of character;
- Impact on the street scene;
- Overdevelopment
- Loss of light;
- Overlooking;
- Noise and disturbance from use;
- Loss or effect on a tree (the only remaining tree in the road).

The parking provisions on Waterton Avenue and the impact that the proposed development will have on the existing situation were included in all six of the neighbour representations. This matter will be discussed in the 'Parking and Highways' section below.

The concerns raised with the proposal being out of character, overdevelopment, negatively impacting on the street scene and removing a street tree have been discussed in detail in the 'Design Character and Appearance' section above.

In terms of light. Even though a two storey rear extension can result in loss of light or overshadowing, due to the orientation of the properties, with north facing gardens, and the two storey element being set-in from the shared boundary with the adjoining neighbour.

Similarly, the development is not considered to impact on the privacy of any neighbouring property. The private garden area of a property is defined in the RLG as the first 5m of garden from the rear wall of the dwelling. The proposed extension is not considered to result in direct overlooking into the private amenity space of any adjoining property. There are no adjoining properties at the rear and windows only view onto the private amenity space of the neighbours will be at obscure angles, and are not expected to impact significantly over and above the existing fenestration arrangement.

Overall, the proposed development is considered to safeguard the amenity of adjoining properties in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF.

Parking and Highways

The proposed development poses some concerns in terms of parking and highway policy. Although the development provides two off-street parking spaces per dwelling which accords with Kent County Council's parking standards (SPG 4) (2006), there are concerns with the existing demand and lack of spaces proposed.

According to the Design and Access Statement (DAS) the existing occupiers will move into one of the dwellings and the other will be sold, and the photographs within the DAS show four vehicles using the driveway. The site visit undertaken by the Highway Officer consolidated that four vehicles are parked at the property. It is anticipated that the existing number of vehicles will remain at the property, however there will not be sufficient space on the new driveway to accommodate four vehicles. This will result in increased pressure on street parking which was a major concern of neighbouring properties.

In addition, the tandem parking arrangement proposed is awkward. Although not contrary to highway policy and not objected to by the Highway Officer this would involve additional movements of vehicles to enter or exit the driveway and is not a recommended strategy.

The proposed development also fails to provide cycle storage as required in the Kent County Council parking standards (SPG 4) (2006). The parking standards state that a residential dwelling should provide space for one cycle space per dwelling.

Overall, the proposed development will have increase demand for on street parking and provides inadequate cycle storage. Therefore, the application is contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy (September 2014), saved Policy P3 (Vehicle Parking Standards) of the Gravesham Local Plan First Review (1994) and the KCC adopted Vehicle Parking Standards (SPG4) which seek to ensure that adequate car and cycle parking is available on site.

Any Other Material Planning Considerations

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

The plan submitted show that there will be a refuse area at the front of each property, with space for three wheelie bins. The future occupiers would be required to place their refuse containers onto Waterton Avenue on collection day, and return them to the property following collection. This is the same strategy for other properties within the surrounding area.

In summary, with regard to the refuse arrangements, the strategy complies with Policy CS19 (LPCS).

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 £253.84 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 £253.83 per new dwelling unit.

The applicant has completed the SAMMS Mitigation Contribution Agreement. Therefore, the proposed development complies with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 175 and 176) of the NPPF (2021) and Policy CS12 (LPCS).

Flood - The site is located within flood zone 3 in an area, which benefits from flood defences. A Flood Risk Assessment is required for all developments, including minor development and change of use within flood zone 2 or 3. Although comment has not been sought from KCC's Flood and Water Management department or the Environment Agency (as the application is not supported), the Environmental Agency guidance clearly states that Flood Risk Assessments are required. As such, it is not possible to determine the acceptability of this application without a FRA.

The proposed development therefore conflicts with the requirements of Policy CS18 (LPCS) and section 14 of the NPPF.

Conclusion

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

The proposed extensions to the property are complex, convoluted and poorly designed. The quantity of additions required to subdivide the property is overdevelopment and the extensions will have a harmful, terracing effect on the street scene. Moreover, the extension to the vehicle crossover will involve the removal of a street tree and will have an urbanising impact on the street scene. As such, the proposal is contrary to Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy (September 2014) and Section 12 of the National Planning Policy Framework (2021).

The proposed subdivision of the property will increase pressure on on-street parking provisions by virtue of the existing demand at the property significantly exceeding the proposed driveway capacity. In addition, the proposal fails to provide adequate cycle storage. Therefore, the application is contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy (September 2014), saved Policy P3 (Vehicle Parking Standards) of the Gravesham Local Plan First Review (1994) and the KCC adopted Vehicle Parking Standards (SPG4).

Lastly, the site falls within flood-risk zone 3, and the applicant has failed to provide a Flood Risk Assessment as required by Policy CS18 of Gravesham's Local Plan Core Strategy (September 2014) and Section 14 of the National Planning Policy Framework (2021).

Recommendation

Refusal

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

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	20 th December 2021	Dated:	21 December 2021