

Delegated Report

Planning Application

Planning Application No: 20220671

Location: 17 Lynton Road South Gravesend Kent DA11 7NF

Description: Erection of single storey and first floor rear extensions; construction of dormer extension in rear roof slope; conversion of roof space into habitable rooms; and conversion of dwelling into 1 x 2 bed flat and 1 x studio flat

Applicant: Mr Anthony Curtis

Site Visit Date: 06 July 2022

Submitted Documents/Plans

Application for planning permission form;
Drawing no. 001 Rev. A Existing and proposed block plans;
Drawing no. 002 Rev. A Existing elevations and layouts;
Drawing no. 003 Rev. A Approved plans for 20220203;
Drawing no. 004 Rev. A Approved plans for 20220209;
Drawing no. 005 Rev. A Proposed layouts;
Drawing no. 006 Rev. A Proposed elevations; and
Covering letter dated 21 June 2022.

Procedural issues

It should be noted that the submitted drawings have some inaccuracies and omissions. These include;

- Drawing no. 002 Rev. A (existing elevations and layouts) does not show the existing chimney on the rear projection on the northern and southern elevations.
- Drawing no. 004 is not entirely consistent with the approved plan for 20220209 but it does show the main elements of the proposal accurately.
- Drawing no. 006 Rev. A (proposed elevations) does not show the proposed roof light on the southern elevation.

However as site photographs and other sources of information adequately illustrate these features, the drawing problems have not undermined the determination of the application.

As the proposed development would adjoin the boundaries with nos. 15 and 19 Lynton Road South, the applicant was asked to confirm whether any of the proposed works (foundations/roof/guttering etc) would encroach over these boundaries. In an email dated 19 July 2022, the applicant confirmed that no encroachment would occur.

Relevant Planning History

Reference	Description	Decision	Decision Date
20220209	Application for Lawful Development Certificate for proposed construction of a dormer extension in the rear roof slope and conversion of the roof space into habitable rooms.	Granted	14.04.2022
20220203	Erection of single storey ground floor side and first floor rear extension.	Permitted	22.04.2022

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
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- H5 – Increasing Housing Stock by the Conversion of Existing Buildings
- TC7 – Other Archaeological Sites
- T1 – Impact of Development on Highway Network
- P5 – Exceptions to the Vehicle Parking Standards – Change of Use of Buildings

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)

- 2 – Achieving Sustainable Development
- 5 – Delivering a Sufficient Supply of Homes
- 9 – Promoting Sustainable Transport
- 12 – Achieving sustainable development and well-designed places
- 15 – Conserving and Enhancing the Natural Environment
- 16 – Conserving and Enhancing the Historic Environment

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)

Consultations, Publicity and Representations

GBC – Highways Officer

Given the property history of this site, the current dwelling must be considered as having four bedrooms. The Kent County Council publication, Kent Design Review: Interim Guidance Note 3 Residential Parking requires two parking spaces to be provided for such properties in a suburban location, whilst for one and two bedroom flats it is one space per dwelling. There is therefore no change in car parking requirements as a result in development. Nor is there any need to provide cycle parking as for houses the parking ratio is one cycle space per bedroom whilst for flats it is one space per dwelling. It is however highly desirable that cycle parking should be provided to encourage Active Travel measures when possible.

GBC – Environmental Protection Team (Regulatory Services)

The following to be considered.

Code of Practice on Construction and Demolition:

Please apply

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

GBC – Service Manager (Housing Options)

Private Sector Housing have no comments to relay in relation to our housing legislations and regulations. We believe the proposed scheme is currently out of our remit with Planning requirements and Building Regulations taking precedence.

GBC – Waste & Recycling Manager

I have reviewed the above planning application and I have concerns about wheelie bin provision for this property.

I am concerned that only having one set of bins for the property could lead to conflict around refuse and recycling provision. The Council has a very strict no-side waste policy so if one property fills up the residual waste bin, there would be an issue for the other property not being able to dispose of their waste.

To remove this potential issue, I would expect to see provision made available for two sets of bins, there also needs to be a provision for food waste, which is not shown on the plans.

KCC – Heritage

The site lies within an area of multi-period archaeological potential. However, it is considered unlikely that these proposals, immediately adjacent to the existing dwelling, would have a significant below-ground archaeological impact and have no further comments to make in this case.

Natural England

No objection subject to securing appropriate mitigation for recreational pressure impacts on habitat sites (European sites).

Neighbouring properties

The application was publicised by a site notice and to eight neighbouring properties by letter. Seven representations (objecting to the proposal) have been received and are summarised as follows;

- Lynton Road South comprises of single family dwellings with long term occupants.
- The property should not be subdivided into two smaller dwellings as this would alter the character and appearance of the building and street and attract short term occupiers.
- If permitted, this proposal would set an unacceptable precedent.
- The proposal is contrary to paragraphs 5.11.2, 5.11.3 and 5.11.7 of the Gravesham Local Plan Core Strategy 2014.
- Existing parking pressures in Lynton Road South would be exacerbated
- Existing parking restricts access for emergency services and deliveries.
- Renovation of the property is welcomed after many years of neglect.
- Queries the extent of the publicity for the application.

It should be noted that four other representations were received. These representations were from two local residents making and then withdrawing objections to the proposal, and as such, have not been included in the comments above.

Officer's Analysis

Principle of the Development

Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 sets out the development strategy for the Borough and highlights the objectively assessed need for housing over the Plan period (up to the year 2028) as being at least 6,170 new dwellings. The policy seeks to retain and improve the existing stock of housing and prioritises development in the urban area as a sustainable location.

Policy CS14 of the Gravesham Local Plan Core Strategy September 2014 seeks to protect the mix of housing in the existing stock and to restrict the conversion of family sized units into smaller properties. In the preamble to this policy family homes are defined as homes with two or more bedrooms. It also states that new housing development should 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.

Saved Policy H5 of the Gravesham Local Plan First Review November 1994 sets a number of criteria for the consideration of proposals for the conversion of dwellings into smaller units. As the policy pre-dates the National Planning Policy Framework 2021 (NPPF 2021), the weight attached to the policy must be considered carefully; with greater weight being given where the approach is consistent with the NPPF 2021. It is considered that this policy provides a local interpretation of the broad approach to housing development and design set out in the NPPF 2021 and therefore should be afforded reasonable weight.

Saved Policy H5 requires the building to be in an appropriate area for conversion to flats, maisonettes, bedsitters and multiple occupancy. It states that, unless there are special or overriding circumstances, conversions will not normally be permitted in an area comprised for the most part of single family dwellings. It also sets out that the building shall be of such a size and arrangement as to be generally unsuitable for single family occupation. Lastly it requires the proposal to have regard to the Borough Council's Residential Layout Guidelines and the adopted Vehicle Parking Standards.

The application site is located in an area where single family dwellings prevail. The property is a four bedroom dwelling which is unoccupied and in a poor state of repair. The existing room layout is functional and would provide a good standard of living for future occupiers (subject to renovation).

Therefore the proposed development would result in the loss of a family home capable of accommodating a larger household and would, by virtue of the introduction of flats, undermine the character of the surrounding area and would be contrary to Policies CS02 and CS14 of the Gravesham Local Plan Core Strategy 2014 and to Saved Policy H5 of the Gravesham Local Plan First Review (1994).

It is noted that local residents have stated that Lynton Road South comprises of single family dwellings with long term occupants and that the application property should not be subdivided into two smaller dwellings, as this would alter the character and appearance of the building and street and attract short term occupiers.

Consideration of the proposal regarding the Residential Layout Guidelines and the adopted Vehicle Parking Standards will be set out below.

Housing Delivery

Given Gravesham's current inability to demonstrate a five year housing land supply (reference to the Five Year Housing Land Supply Statement 2020-25 illustrates that a 3.27 year supply has most recently been calculated) 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. Therefore paragraph 11(d) of the NPPF 2021 is relevant. This paragraph requires that 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 2021 at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 180)
- 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.

The application site is not within an area of particular importance as defined above and therefore paragraph 11(d)(ii) of the NPPF 2021 is relevant.

Therefore overall, in determining applications for planning permission involving housing, the Council will 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) of the NPPF 2021) 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 would provide one new residential unit, which would represent a minimal increase in housing supply, which weighs in favour of the proposal. However, this must be balanced against the other requirements of the NPPF 2021 and in particular, Sections 2, 5, 9, 11, 12 and 15, which require development to be sustainable and make effective use of land; to add to the overall quality of the area, be visually attractive and sympathetic to local character; to provide a high standard of amenity for existing and proposed users; and to provide safe and suitable access. These issues will be discussed in detail in the sections below.

Design, Character and Appearance

Paragraph 130 of the NPPF 2021 sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 134 of the NPPF 2021 states that development that is not well designed should be refused, especially where it fails to reflect local design

policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

The application site is a two storey mid terraced house which although currently vacant, is a single family dwelling which has not been previously extended. The application site has a small front garden and a soft landscaped rear garden. The property has an original rear outrigger which projects at both first and ground floor level. The ground floor projection is larger than the first floor projection and is identical in depth at both storeys to the adjoining occupier at no. 15 Lynton Road South.

Some of the neighbouring properties have extended their outriggers at both first and ground floor level. However these extensions appear to be historical and possibly constructed without the benefit of planning permission. Also some of the neighbouring properties have dormer extensions in their rear roof slopes.

It is noted that no. 4A Dashwood Road has a rear dormer that extends across the rear roof slope and an original outrigger, which was built using permitted development rights (reference 20180140). However it is noted that no. 4A Dashwood Road is not directly comparable to the application property (it is a larger property, in a corner location). Notwithstanding this, the following image illustrates that the dormer is a prominent feature in the street scene that does not match with the character of the existing building;



The proposed development comprises of single storey and first floor rear extensions; the construction of an L-shaped dormer extension in rear/outrigger roof slopes; the conversion of roof space into habitable rooms and the conversion of dwelling into 1 x 2 bedroom flat and 1 x 1 bedroom flat.

At ground floor level the proposed extension would not project past the original outrigger and a small 1.6 metre gap would be left between the extension and rear elevation of the main dwelling. The existing ground floor outrigger would result in some minimal changes to include a roof light and the replacement of windows with a bifold door in the rear elevation. The first floor extension to the existing outrigger would retain the existing width with a modest 1.9 metre increase to the projection. The existing chimney stack would be removed.

The dormer extension would extend across the full width of the rear roof slope and above the existing roof of the outrigger. The roof height of the outrigger would be increased by 1.2 metres and it would become partially flat roofed.

The walls of the extensions would be built with materials to match the existing dwelling but no details of the proposed materials for the roofs or dormer have been specified.

The Householder Extensions/Alterations Design Guide (2021) states that roof extensions should be lower than the existing ridge line and retain the original ridgeline treatment and that dormers should not overwhelm the roof slope within which they are to be placed.

The proposed development would significantly increase the floor area of the application property and whilst the ground and first floor extensions would be subservient to the host dwelling, the proposed dormer would be a large and incongruous feature, which would not appear subservient and would detract from the character of the existing building. It is noted that the design of the dormer that is proposed to be located above the ridgeline of the rear outrigger, would be contrary to adopted design guidance. Therefore it is considered that when taken together, the proposed extensions cumulatively would not be subservient to the existing building and would undermine its fundamental character.

It is noted that the proposed operational works (the dormer and rear extensions) have already been subject to two separate applications (lawful development certificate reference 20220209 for the dormer and planning permission reference 20220203 for the extensions). These works were proposed and considered in the context of them being alterations to an existing single family dwellinghouse and were granted in line with development plan policy and the relevant legislation. In particular, it is noted that the proposed dormer can only be built using permitted development rights if the property is in use as a single dwelling and that in determining a lawful development certificate, the Borough Council could not consider the visual/design impacts of the dormer, only if it would be permitted development.

The current application includes operational works and a change of use, i.e. the dormer and extensions would need to be built to facilitate the conversion of the building into two flats. Therefore the context of the built development would be different. The proposal would be a single redevelopment of the building to provide two flats. Therefore all the works (both operational and the change of use) require planning permission and it must be determined whether the previously acceptable or lawful operational development is still appropriate in its currently proposed context.

As set out at the start of this officer analysis, the proposed conversion would introduce a new form of development into the area, changing the application property from a single family dwelling into two flats, which would be detrimental to its fundamental character. It is also considered that the extent of the proposed extensions/dormer directly reflect the need to provide sufficient floor area for two future households rather than one. Therefore, the introduction of flats would lead to a bulky and incongruous design approach, which would be an overdevelopment of the application site, detrimental to the character and appearance of the existing building and the surrounding street scene.

Overall the proposed flats would introduce a form of development that is at odds with the predominately single family dwelling character of the surrounding area. The design, including a large dormer would be bulky and incongruous and result in overdevelopment, to the detriment of the character and appearance of the existing building and the surrounding area. As such the proposal would be contrary to Policies CS14 and CS19 of the Gravesham Local Plan Core Strategy 2014, to Saved Policy H5 of the Gravesham Local Plan First Review (1994), to paragraph 130 of the National Planning Policy Framework 2021 and to the Householder Extensions/Alterations Design Guide (2021).

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

Flat one would provide a double bedroom with a floor area that is below the minimum requirement for a double bedroom set out in the Nationally Described Space Standard (2015). The flat would accommodate three people, in two bedrooms, over two storeys and would fall slightly short of the minimum floor area

requirement for such accommodation, which would be detrimental to the living conditions of future occupiers.

Flat two is shown to accommodate one person, in a single bedroom, over two storeys (as the bedroom width only accommodates a single bed) but a large dressing room is included in the proposed layout. As a result of limited headroom within the dressing room, and in the absence of a cross section, it is not clear how much usable floor space would be provided. Therefore the overall floor area figure for flat two can only be estimated. The Nationally Described Space Standard (2015) does not specify a minimum floor area for a one person, one bedroom, two storey residence but it would appear that the proposal would have sufficient floor space for such accommodation (NB the relevant single storey figure has been adjusted upwards to account for the extra circulation space needed for stairs). The proposed bedroom exceeds the minimum floor area requirement for a single room. As such, flat two would provide acceptable living conditions for future occupiers.

Flat one could be occupied by a family and would have access to a rear garden, which has an area and depth which exceed the minimum requirements set out in the Residential Layout Guidelines 2020. This is a positive feature.

In general terms it is considered that the layout of the proposed flats has been compromised by the amount of circulation space required for stairs. Flat one in particular has a reduced amount of living space and a small double bedroom, which for a potential family home, would be a negative feature.

In order to prevent any future loss of privacy to proposed occupiers, any planning permission granted should be conditioned to ensure that the two proposed bathroom windows are obscure glazed and top hung.

The proposed development shows two refuse bins stored in the front garden of the application site. The GBC Waste & Recycling Manager has raised concerns regarding this appropriateness of this arrangement for two residential units. Therefore any planning permission granted should be conditioned to require details of refuse provision to be submitted and approved.

Overall it is considered that, by virtue of the cramped and compromised layout, the proposed development would be detrimental to the residential amenity of future occupiers and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The closest residential properties to the application site are nos. 15 and 19 Lynton Road South (located to the north and south respectively). No. 32 Bartlett Road is located to the west across a rear alleyway and nos. 16 to 22 Lynton Road South are located to the east across the roadway.

Due to the design of the proposed development, to the screening provided by boundary treatments and to the layout and orientation of the surrounding properties, there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of the surrounding dwellings.

In order to prevent any future loss of privacy, any planning permission granted should be conditioned to preclude the insertion of any windows or openings in the side elevations of the proposed development and to ensure that the first floor hallway window is obscure glazed and top hung.

Overall the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

Parking and Highways

The application property is a four bedroom dwelling with no car parking provision. Local residents have raised concerns that the proposed development would exacerbate existing parking pressures and access impediments in Lynton Road South. However, the GBC Highways Officer sets out that two parking spaces should be provided for four bedroom dwellings in a suburban location, whilst for one and two bedroom flats, one space per unit would be required. As such, there would be no change in car parking demand as a result of the proposed development.

In relation to cycle parking, one space per unit would be required for flats and in order to encourage more sustainable forms of travel, it would be desirable that cycle parking be provided. Therefore, any planning permission granted should be conditioned to provide two cycle parking spaces.

Overall it is considered that the proposal would not be detrimental to highway safety and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy 2014.

Ecology and Biodiversity

The application site is within 6km of the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA), which are internationally important for nature conservation because 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 Borough Council has decided to impose a tariff on new housing development. Developers will need to pay £275.88 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. The applicant has not paid towards the mitigation.

The comments of Natural England are noted. 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, Section 14 (specifically paragraphs 180 and 181) of the NPPF 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Any Other Material Planning Considerations

The application site is located in an area of multi-period archaeological potential and KCC Heritage considers it unlikely that the proposed works would have a significant archaeological impact. As such, the proposal would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located within Groundwater Source Protection Zone 3, a Site of Special Scientific Interest (SSSI) Impact Risk Zone and a smoke control area. However, as the proposed development would be within the confines of an existing residential garden and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to any sensitive habitats or groundwater. With regard to the smoke control area, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted.

The application site is located within the buffer zone for the Woodfield Avenue historic landfill site and provided that a contamination watching brief condition is attached to any planning permission granted, then there would be no adverse contamination impacts.

Local residents have raised a number of issues, some of which have been discussed above. However the remaining issues are set out and considered as follows;

- *If permitted, this proposal would set an unacceptable precedent* – the application property is one of a number of similar dwellings in Lynton Road South and as such, the proposal, if permitted could be replicated, to the further detriment of the character of the area.
- *Renovation of the property is welcomed after many years of neglect* – it is acknowledged that an improvement in the physical condition of the application property would be a positive outcome from the proposal, however this must be balanced against the harm to the character of the existing building and the surrounding area.
- *Queries the extent of the publicity for the application* – publicity in excess of the statutory requirement has been undertaken.

Conclusion & Recommendation

The proposed development would result in a minimal boost in the supply of dwellings in the Borough. This would generate both social and economic benefits, with economic benefits accrued through the construction phase and subsequently, through the reliance of future occupiers on local facilities and services. Although due to the scale of the proposed development, these benefits would be of limited weight. The proposal would also renovate a building in poor repair, be a more efficient use of the site, cause no detriment to surrounding residential occupiers or to highway safety and would have no adverse impacts to groundwater or archaeology. These benefits are attributed modest weight.

The above report identified the adverse impacts of the proposed development, which are summarised below;

- The proposed flats would introduce a form of development that is at odds with the predominately single family dwelling character of the surrounding area. The design, including a large dormer would be bulky and incongruous and result in overdevelopment, to the detriment of the character and appearance of the existing building and the surrounding area. As such, the proposal would be contrary to Policies CS14 and CS19 of the Gravesham Local Plan Core Strategy 2014, to Saved Policy H5 of the Gravesham Local Plan First Review (1994), to paragraph 130 of the National Planning Policy Framework 2021 and to the Householder Extensions/Alterations Design Guide (2021).
- The proposed development would result in a compromised and cramped internal layout which falls below the expected minimum floor areas as stated in the Nationally Described Space Standard (2015), to the detriment of the living conditions of future occupiers and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and to paragraph 130(f) of the National Planning Policy Framework 2021.
- 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, Section 14 (specifically paragraphs 180 and 181) of the NPPF 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Overall it is considered that the adverse impacts of the proposed development attract significant weight and would significantly and demonstrably outweigh the benefits of the proposal. Therefore, following a thorough assessment of the application and all material planning considerations relating to the proposal, it is considered that the proposed development cannot be supported and that planning permission should be refused.

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:	K Joyce	Signed:	
Dated:	12th October 2022	Dated:	14 October 2022

Gravesham Borough Council