

Delegated Report

Planning Application

Planning Application No: 20230482

Location: 15 Harden Road Northfleet Gravesend Kent

Description: Erection of a single storey 1 bedroom dwelling in the rear garden with associated parking.

Applicant: Mr MUSA CICEK

Site Visit Date: 13.07.23

Submitted Documents/Plans

Application Form;
Supplementary Information – Photos;
Supplementary Information – Data Sheet;
Supplementary Information – Design and Access Statement;
Site Location Plan (received on 22.05.2023);
Drawing No 100 02A – Elevation and Floor Plan – Existing;
Drawing No. 0100/40A – Floor Plan and Elevations to show Parking for Main House – Proposed;
Drawing No. 0100/41 – Front Elevation of 15 Harden Road – Proposed; and
Drawing No. 0100/42 – Visibility Splays – Proposed.

Superseded Documents/Plans

~~Site Location Plan – Incorrect (received on 09.05.23); and~~
~~Drawing No. 100/40 – Elevations Section and Floor and Roof Plan – Proposed.~~

Procedural Matters

It should be noted that Certificate B has been provided for this application along with evidence to show notice has been served on the owners of the land in question. Ideally, the Application Form would have been amended with this updated information. Furthermore, it would have been beneficial for all elevations to be shown on the plans e.g existing front elevation. Notwithstanding the above, no neighbour responses have been received, and as the Local Planning authority are not minded to permit this application, further amendments and clarifications were not sought.

Relevant Planning History

Reference	Description	Decision	Decision Date
20220619	Erection of a single storey 1 bedroom dwelling in the rear garden.	Refused	22.07.2022
20181158	Erection of a single storey two bedroom detached dwelling with access from Henry Gardens.	Refused	08.02.2019
20170597	Erection of a two storey 2 bedroom detached dwelling with attached garage and access from Henry Gardens.	Refused	14.11.2017

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
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact on the Highway Network
- T5 – New Access onto the Highway Network

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
- 12 – Achieving sustainable development and well-designed places
- 15 – Conserving and Enhancing the Natural 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); and
- Householder Extensions/Alterations Design Guide (2021).

Note - Although the Householder Extensions/Alterations Design Guide (2021) is aimed at extensions and alterations, the design guidance is still relevant here.

Consultations, Publicity and Representations

Consultees

GBC – Highways Officer

This proposal raises several issues.

1. Henry Gardens is not a publicly maintained carriageway, and whilst accesses from private roads is not unusual, there is normally a legal requirement to maintain the road by the people that own or use it. In the case of Council Tenants this would be via their rent, but once houses are sold much depends on the terms the property was sold.



Whilst not necessarily a planning issue the applicant should confirm what access rights he has and if he has any, then they transfer to the new property.

2. New accesses should have suitable visibility splays to ensure the safe use of the access. It is accepted that there is no injury accident record for Henry Gardens, but this is not surprising as the road is not public highway and vehicle speeds would be low. Henry Gardens also serves a few residential properties, so its use by pedestrians can be anticipated. The Highway Code establishes a clear road user hierarchy with pedestrians being given priority at junctions, so at a minimum I would expect to see a 2m x 2m pedestrian visibility splay either side of a driveway, to ensure pedestrians are given the priority they deserve. Although ideally 7m x 2.4m x 7m visibility splays should be provided at the minimum, which is the Manual for Streets Guidance for a 5mph environment and mostly reflects the provision for the new dwellings already accessed via Henry Gardens



Google Street View Henry Gardens November 2022

3. The applicant makes reference to surface water being disposed off via main sewer

How will surface water be disposed of?

☐ Sustainable drainage system

☐ Existing water course

☐ Soakaway

☒ Main sewer

☐ Pond/lake

This may or may not be possible, the connection of surface water to a foul sewer is not permitted as it increases the risk of sewage surcharge to the environment during extreme weather periods. However, there is the possibility there are old, combined sewers (both surface water and foul) or surface water sewers only. The applicant should confirm with

Southern Water what sewers are available and whether a connection would be permitted. Soakaways would not be a possible option due to the requirements of the Building Regulations. There may also be private sewers/drains in the area, which the applicant would have to negotiate with the owner regarding a possible connection.

4. With regards to the parking space in the front garden the sight lines shown are fortunately wrong as they cross several gardens outside the control of the applicant and would not be considered acceptable. The sight line is measured 2.4 metres back from the kerb edge along the centre line of the driveway and 43metres in either direction along the kerb line from the centre of the driveway. These sight lines would wholly be within the grass verge. I note the front garden only measures some 5 metres deep but has sufficient width to allow a single vehicle to be parked whilst providing a clear pedestrian access to the front door of the property.
5. My understanding is the red line drawing should extend to the highway as otherwise any access to the highway by a vehicle would not be possible, although pedestrian access may be possible through the rear garden of 15 Harden Road.

As presented, I believe there is inadequate information in particular relating to drainage and visibility to take a definitive view.

Local Ward Councillors

No comments received.

Neighbouring properties

7 surrounding properties were consulted and no responses were received. The consultation period expired on 13.06.23.

Preliminary Matters

This application follows the refusal of several other proposals at this site, as highlighted in the planning history section of this report. The most recent application – **20220619 - Erection of a single storey 1 bedroom dwelling in the rear garden** was refused on the following grounds:

1. *The scale and appearance of the proposed dwelling fails to respect the surrounding buildings. The width of the dwelling introduces a prominent and visually intrusive building into the rear garden area which will dominate the outlook from neighbouring properties and reduce their amenity. As such the proposal will not integrate well into the surrounding area, contrary to Core Strategy Policy CS19 (development and Design Principles).*
2. *The amount private amenity space for future occupants will be poor and lack privacy. The proposal will also adversely impact on the amenity of neighbouring properties. As such it is concluded that the proposal represents overdevelopment of the site and will harm the residential amenity of the neighbouring properties in Harden Road & Henry Gardens and the future occupants of the new bungalow, contrary to the adopted Residential Layout Guidelines and CS19 of The Local Plan Core Strategy 2014.*
3. *The proposed parking spaces are insufficient and do not comply with guidance and pose a danger to other road users. The proposal is therefore contrary to saved Local Plan First Review policy P3 and the Gravesham Local Plan Core Strategy 2014, policy CS11, which requires the provision of sufficient off street parking in accordance with KCC Vehicle Parking Standards and Local Plan First Review policy T5 which seeks to ensure that new accesses do not cause danger to other road users.*
4. *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 180 and 181) of the National Planning Policy Framework 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.*

It therefore stands to be determined whether this proposal has overcome the previous grounds of refusal.

Site Description

15 Harden Road is a two storey semi-detached property fronting Harden Road to the north, with Henry Gardens located to the south of the property.

Google Images

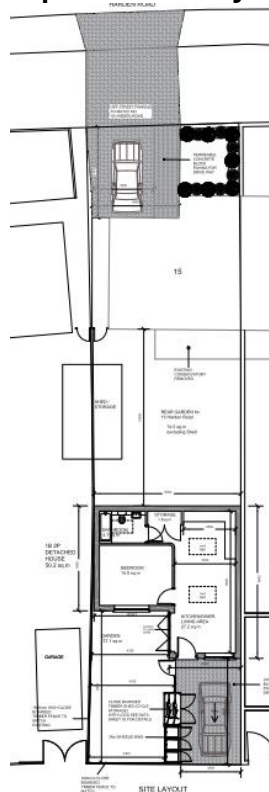


This application proposes the erection of a single storey 1 bedroom dwelling within the rear garden of 15 Harden Road, along with associated parking areas.

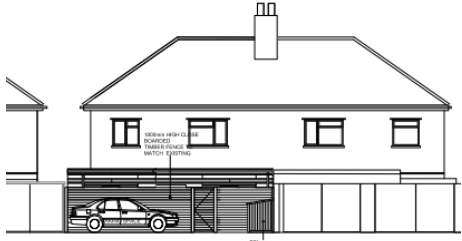
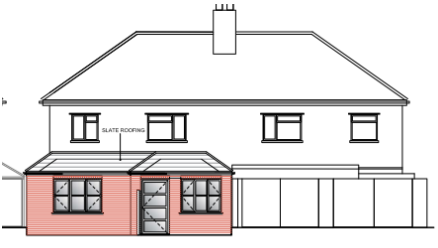
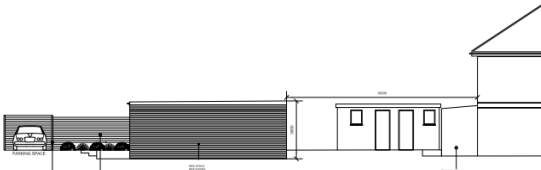
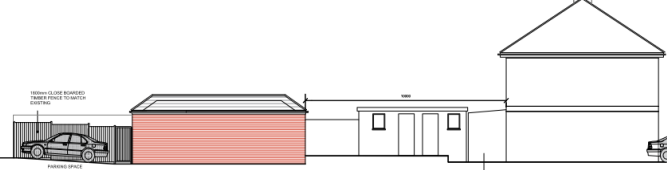
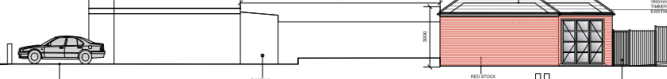
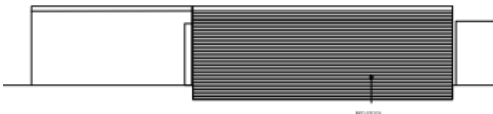
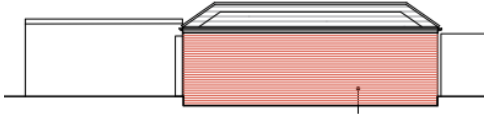
Proposed Development

The development would result in the subdivision of the existing rear garden of 15 Harden Road and the erection of a one bedroom dwelling within the garden comprising of; bedroom, kitchen/diner/living area, storage area and bathroom. In addition, one parking space is proposed for the new dwelling along with one parking space proposed for the existing dwelling (15 Harden Road itself).

Proposed Site Layout



Proposed Elevations for refused Application (20220619) and this Application (20230482)

Proposed Elevations as per Application 20220619 (not including front Elevation of Main Dwelling)  STREET ELEVATION	Proposed Front Elevation of Main Dwelling (for this current application 20230482)  PROPOSED FRONT ELEVATION
 FRONT ELEVATION	Proposed Elevations of New Dwelling (in relation to the existing)  FRONT ELEVATION
 SIDE (EAST) ELEVATION	 SIDE (EAST) ELEVATION
 SIDE (WEST) ELEVATION	 SIDE (WEST) ELEVATION
 REAR ELEVATION	 REAR ELEVATION

The maximum dimensions of the proposed new dwelling would be:

- Height 3.44m
- Width 8.30m
- Depth 8.61m
- Building Footprint (external measurement) 59.86sqm

Officer's Analysis

The application site lies within the urban area. Policy CS02 of Gravesham's Local Plan Core Strategy (LPCS) (2014) identifies Gravesend, Northfleet and Ebbsfleet as the most sustainable parts of the Borough. Therefore, there is no objection to the principle of residential development providing it meets the requirements of local and national planning policy and guidance.

Principle considerations for this enquiry include:

- Housing need
- Design character and appearance
- Amenity of future occupiers
- Neighbouring amenity
- Parking and highways
- Any other material planning considerations

Housing Need

Given Gravesham's current inability to demonstrate a 5 year housing land supply (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 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 (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 181)
- Sites of Special Scientific Interest;
- Green Belt;
- Local Green Space;
- Areas of Outstanding Natural Beauty;
- A National Park (or within the Broads Authority) or defined as Heritage Coast;
- 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 unit would offer a minimal contribution towards meeting this local need and, accordingly, officers consider that this should be accorded appropriate weight in support of the application. However, this must 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.

Design, Character and Appearance

Development Plan policy places considerable emphasis on the importance of achieving high quality buildings and places. Paragraph 130 of the NPPF (2021) seeks to ensure that development will add to the quality of an area, be visually attractive, sympathetic to local character and history and will create places that have a high standard of amenity for existing and future users. Policy CS19 of the Local Plan Core Strategy (LPCS) 2014 reflects these aims and requires that new development is well designed so that it strengthens the character and distinctiveness of the area and safeguards local amenity. It also requires development to be designed using a robust analysis of the local context and character to ensure the proposal would make a positive contribution to the street scene. Development should conserve and enhance the character of the local built, historic, and natural environment and integrate well with the surrounding local area.

Policies CS14 (Housing Type and Style) and CS15 (Housing Density) (LPCS) (2014) expects new development to take *into account the existing character of the area* and for new housing to be developed *at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated*. CS15 (LPCS) (2014) states that *development proposals that fail to make efficient use of the land for housing, having regard to the character and location of the area, may be refused planning permission*.

The predominant style of the surrounding dwellings on Harden Road are two storey, semi-detached properties that are set back significantly from the highway, with large front gardens enclosed by a low boundary treatment. They are uniform in design, and the area has been designed to include grass verges, which is characteristic of the area. The installation of a vehicular crossover in this location cannot be conducted under permitted development rights, and planning permission is required. It is noted that No.19 Harden Road has installed a crossover and driveway area, however this appears to have been carried out without the benefit of planning permission and may now be immune from enforcement action through the passage of time. It also serves to demonstrate the harm this kind of development can cause to the visual character and appearance of the street scene. As such, the introduction of a hard paved surface to facilitate a vehicular crossover and associated hardstanding area at No.15 Harden Road would have a detrimental impact on the visual amenity, character and appearance of the local area.

Subsequently, the proposed new dwelling does not conform to the design of the character of the area, and there is insufficient space in situ to do so. In addition, the use of proposed external materials to match 15 Harden Road and a part pitched, part flat roof would not mitigate the overall design and nature of the proposal. It is noted the properties to the rear of Harden Road (Henry Gardens) are 1 bedroom bungalows, however this is not comparable to what is proposed within the rear garden environment by this application, by virtue of its cramped design and inappropriate siting within the rear garden of the host dwelling. The proposal does not respond to local context and character, would not function well and would not be considered to make a positive contribution to the area. The proposal is considered to be incongruous and would detrimentally impact the predominant residential design within the street scene. It would offer a cramped form of residential accommodation whilst disrupting the established street pattern. Whilst it is noted that amendments have been made, as per the previous delegated report, the dwelling remains a *prominent and visually intrusive building*.

As such, it is not considered that the revised proposal has overcome grounds of refusal 1 for application 20220619 and the proposal is contrary to Policies CS14, CS15 and CS19 of Gravesham's Local Plan Core Strategy (LPCS) (2014) and Section 12 (NPPF).

Amenity of Future Occupiers

The "Technical housing standards – nationally described space standard" was published by the Department for Communities and Local Government in March 2015. This document sets out requirements for the gross internal area of new dwellings at a defined level of occupancy as well as floor

areas and dimensions for key parts of the home. The proposed new dwelling is a one-storey, one-bedroom, two-person residential unit. The required minimum gross internal floor area for such a unit is 50.00 sqm. The plans indicate that the gross internal floor area of the dwelling would measure approximately 49.41sqm (including internal walls). As such, it would fall below the “Technical housing standards – nationally described space standard” and would fail to provide a suitable unit of accommodation. This further demonstrates the unsuitability of this site for the proposed development by virtue of the substandard size of the proposed dwelling.

In addition, Gravesham’s supplementary guidance; SPG2 – Residential Layout Guidelines (RLG) (2020) sets out expected room sizes for development including garden depth and area. The plans show the proposal would comply with the guidance, however the garden for the new dwelling would be located at the front of the property which conflicts with the RLG (2020).

The proposal would create an off-street parking space for the occupiers 15 Harden Road along with another off-street parking space for the new dwelling.

In planning terms, a new dwellinghouse in the rear garden of this site is considered unacceptable. The occupants of the new dwelling may be subject to a sense of enclosure due to the proximity of surrounding buildings including other properties and outbuildings/garages.

Google Aerial Image showing surroundings

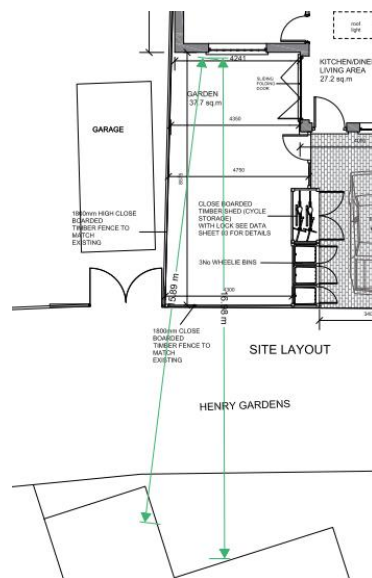


In addition, the enclosed nature of the development could impact light received by the occupants of the dwelling, although this would be unlikely to be severely harmful (at present) due to the overall scale of the new development and surrounding buildings.

As highlighted by the RLG (2020) and included within the previous delegated report for Application 20220619:

“A minimum distance of 21 metres shall be provided between the windows of habitable rooms and the private garden area of any dwelling. A private garden area is defined as the first five metres of garden adjacent to the rear of the dwelling”

Whilst it is accepted the garden is not located to the rear of the house, this would still apply to a main garden if it is in the front of a property and despite the 1.8m high close boarded fencing this arrangement offers limited private amenity space for future occupants and the property located in the opposite Henry Gardens.



Overall, the proposal is not considered to adequately safeguard the amenity of future occupiers contrary to Policy CS19 (LPCS) (2014) and Section 12 (NPPF) (2021).

Neighbouring Amenity

No neighbour responses were received during the consultation process, however the development has been assessed in terms of neighbouring amenity.

In situ, the proposal would not detrimentally impact neighbouring amenity in terms of loss of outlook or cause a sense of enclosure. In addition, the development is not considered to result in a loss of privacy for No.s 15, 13 and 17 Harden Road. However there would not be sufficient space between the development and No.1 Henry gardens as aforementioned above. The development would be directly south of No.15 and by virtue of the height of the proposed dwelling, it would not be considered to detrimentally impact No.15 itself, in terms of loss of light and overshadowing. However, although the development in situ is unlikely to impact No.s 13 and 17 in terms of the dwellings themselves, there would be a detrimental impact on the light within the rear garden environments of No.s 13 and 17 at varying points of the day due to the scope of the development and the proximity to the shared boundaries.

Therefore, grounds of refusal 2 for application 20220619 (relating to the amenity of future and neighbouring occupiers) has not been overcome.

As such the development is not considered to safeguard the amenity of neighbouring properties contrary to Policy CS19 (LPCS) (2014) and Section 12 (NPPF) (2021).

Parking and Highways

It is noted that cycle storage has been shown on the proposed plans and on the data sheet. Notwithstanding this, as per the delegated report for 20220619; *this proposal involves the creation of a new dwelling there will inevitably be an increase in traffic movements and a greater demand for parking at the property. Vehicle parking standards would suggest that one car parking space (Interim Guidance Note 3 of the Kent Design Guide, Residential Parking) and one secure cycle parking space (SPG4) is required for the new dwelling... the proposal also shows the provision of a parking space in the front garden of the host dwelling.*

Policy CS11 (LPCS) (2014) seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is provided in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. This provides some flexibility in areas of high accessibility where compliance with the vehicle parking standards cannot be achieved.

As highlighted by the comments received by Gravesham's Highways Officer, inadequate and incorrect information has been provided. (Planning) concerns include:

- Lack of visibility splays for the new dwelling
- Concerns with the method of surface water disposal
- Incorrect sight lines shown for the proposed parking space within the front garden

As the Local Planning Authority are not minded to permit the development, amendments and clarification has not been sought. As such, the concerns raised within the previous delegated report for application 20220619 remain relevant. Therefore the grounds of refusal 3 for Application 20220619 have not been overcome.

As such, the revised proposal fails to accord with Local Plan First Review policy P3 (1994) and Policy CS11 of Gravesham's Local Plan Core Strategy (LPCS) (2014), which requires the provision of sufficient off street parking in accordance with SPG4 KCC Vehicle Parking Standards (2006), along with Policy T5 of the Local Plan First Review (1994) which seeks to ensure that new accesses do not cause danger to other road users.

Any Other Material Planning Considerations

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 £314.05 for each 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 one 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).

Through correspondence with the applicant, the previous case officer noted that a SAMMS payment of £239.61 was made on application reference 20181158 and no refund was requested when the application was refused. As such the previous monies paid are able to be carried over to this application. However, the applicant was advised a top up payment would be required as the fee is now £314.05 and also a fresh SAMMS Agreement would need to be made.

The applicant has not completed the fresh SAMMS Mitigation Contribution Agreement or paid the top up fee and therefore fails to comply with the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 180 and 181) of the NPPF (2021) and Policy CS12 (LPCS). As such grounds of refusal 4 for Application 20220619 has not been overcome.

Impact on Biodiversity

The proposal would involve building over a large portion of the site, with no details of proposed soft landscaping indicated on the plans. This is contrary to Section 15 of the NPPF (2021), which states that developments should result in a biodiversity net gain. The proposal does not demonstrate how biodiversity net gain is to be achieved, therefore it is contrary to both local and national policy. However, if the Local Planning Authority were minded to permit the application then this could be addressed by condition.

Waste

The plans show refuse and recycling bins would be stored in the garden, and a new gate would provide access to wheel these out on collection days. As such, there are no concerns with the provision of waste storage.

Groundwater Protection Zone

The site is located within a Groundwater Protection Zone 2 area, however, the proposal would be unlikely to be impacted by this constraint.

Archaeology

The site lies within an area of multi-period archaeological potential. However, the proposed development is unlikely to have any archaeological impact.

Conclusion

Whilst it is acknowledged that the proposal would make a minimal contribution to the local need for housing, as aforementioned in this report; 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.

The Local Planning Authority consider a new dwelling in the rear garden of 15 Harden Road to be inappropriate in terms of scale, siting and appearance which is at odds with the prevailing two storey dwellings along Harden Road, and the Bungalows of Henry Gardens. The dwelling would be a highly incongruous addition to the rear garden environment, having a domineering appearance, causing the site to become overdeveloped. Furthermore, the new dwelling would disrupt the existing street pattern and overwhelm the rear garden. In addition, the proposed crossover and hardstanding area within the frontage of the main dwelling would conflict with the established character of the area, by removing the grass verge and replacing it with a hard paved vehicular crossover. As such the development is contrary to Policies CS14, CS15 and CS19 of Gravesham's Local Plan Core Strategy (LPCS) (2014), and Section 12 of the National Planning Policy Framework (NPPF) (2021).

The new dwelling would detrimentally impact privacy and is likely to cause a sense of enclosure, with a

cramped and compact offering of accommodation for the occupants of the new dwelling. Moreover, the proposal fails to safeguard the amenity of future occupiers and the amenity of neighbouring properties. As such the development is contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (LPCS) (2014), and Section 12 of the National Planning Policy Framework (NPPF) (2021).

Inadequate information has been provided to ensure the proposal complies with guidance and doesn't pose a danger to others using the highway. The proposal is therefore contrary to saved Local Plan First Review policy P3 (1994) and Policy CS11 of Gravesham's Local Plan Core Strategy (LPCS) (2014), which requires the provision of sufficient off street parking in accordance with KCC Vehicle Parking Standards, along with Policy T5 of the Local Plan First Review (1994) which seeks to ensure that new accesses do not cause danger to other road users.

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 15 (specifically paragraphs 180 and 181) of the National Planning Policy Framework (NPPF) (2021) 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:	Mrs Lucy Hankin	Team Leader:	Richard Hart
Signed:	L Hankin	Signed:	<i>R Hart</i>
Dated:	14th July 2023	Dated:	14th July 2023