

Delegated Report

Planning Application

Planning Application No: 20250607

Location: F S Steakhouse Ltd, 25 - 26 Milton Road, Gravesend DA12 2RF

Description: Conversion and change of use of first floor from E(B) to C3 use to provide 2 residential units comprising one 1 bedroom flat and one 2 bedroom flat.

Applicant: Mr Kalvindher Sandher

Site Visit Date: 2 July 2025

Submitted Documents/Plans

Heritage and Planning Statement

Noise Impact Assessment

Fan Data Sheet

Drawing no. WMP.2721.DWG.X.01.M.2000 rev C5 (first floor ventilation layout)

Drawing no. 01A (first floor plan as existing)

Drawing no. 02C (first floor plan as proposed)

Drawing no. 03 (site location plan)

Drawing no. 04C (existing and proposed elevations)

Drawing no. 06 (existing and proposed block plans)

Relevant Planning History

20240999	Application to determine if prior approval is required for a proposed; Change of use from Commercial, Business and Service (Use Class E) to Dwellinghouses (Use Class C3) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class MA.		24.12.2024
20200702	_REVISED PLAN_ Conversion and change of use of first floor from A3 (restaurant) to C3 use (dwelling houses) to provide 2 residential units comprising one 1 bedroom flat and one 2 bedroom flat.	Permitted	08.01.2021
20190782	Conversion and change of use of first floor from A3 (restaurant) to C3 use (dwelling houses) to provide 2 residential units comprising one 1	Application Withdrawn	18.10.2019

	bedroom flat and one 2 bedroom flat.		
20120959	Installation of three roof lights in front roof slope.	Permitted	07.08.2013
20120569	Application for variation of condition 4 attached to planning permission reference number 19980017 to allow the restaurant to extend it's hours of opening, to operate between 07.00 hours until 02.00 hours the following morning, every day including Sundays and Bank Holidays.	Permitted	18.09.2012
20100264	Application for the variation of condition 4 relating to planning permission reference number GR/1998/17 ____	Application Withdrawn	30.03.2010
20100159	Application for variation of condition 4 of planning permission reference number 19980017 for erection of a three storey building to form restaurant; to allow the restaurant to extend its opening hours from 07.00 am until 02.00am every day of the week including Sundays and Bank Holidays.	Granted Temporary Permission	01.06.2010
20070962	Application for variation of condition 4 of planning permission reference number GR/1998/17 to allow the restaurant to open at 6.30am.	Application Refused	20.12.2007
20070261	Application for variation of condition 4 of planning application reference number GR/1998/17 to allow the restaurant to extend its hours of opening.	Application Refused	26.07.2007
20060398	Erection of first floor rear extension to provide wc accommodation for restaurant.	Permitted	10.07.2006
20050974	Application for variation of condition 4 of planning permission reference number GR/1998/17 to allow the restaurant to extend it's hours of opening, to operate between 07.00 hours until 02.00 hours the following morning, every day including Sundays and Bank Holidays.	Permitted	28.12.2005

20040282	Erection of a conservatory at first floor level at the rear.	Permitted	17.05.2004
20031092	Display of two internally illuminated double sided projecting signs at first floor level.	Application Refused	11.02.2004
20021018	Erection of a conservatory at first floor level at the rear.	Application Refused	31.03.2003
20000513	Use of the first floor as seating area ancillary to the ground floor restaurant; retention of the 3 no. dormer windows in the rear roof slope; conversion of the roof space into a store; erection of an external fire escape staircase at the rear from first floor level and installation of new shopfront to the partially constructed building previously permitted under planning permission ref. no. GR/98/17.	Permitted	27.10.2000
19980017	Erection of a three storey building to form restaurant at ground floor level with cooking and preparation area in the basement, offices and staffroom at first floor level and a self-contained flat at second floor level.	Permitted	24.06.1998
19930709	Erection of three storey building to form a restaurant with ancillary takeaway facilities at ground floor with two one bedroomed self-contained flats at first and second floor levels.	Permitted	09.02.1995
19891004	Erection of first and second floor levels to form offices and use of part of the ground floor at the side as additional take-away facilities.	Permitted	08.04.1993
19830807	Display of an internally illuminated fascia sign	Consent for Advert	06.12.1983
19830358	Installation of new shop front	Permitted	14.07.1983
19830074	Installation of a new shopfront	Permitted	09.03.1983
19780692	Elevational alterations to a retail shop front	Permitted	04.09.1978

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS05 – Gravesend Town Centre Opportunity Area
- CS11 - Transport
- CS12 – Green Infrastructure
- CS14 – Housing Types and Sizes
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- AP7 – Area Policies (Milton Road)

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015);
- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006);
- Milton Place Conservation Area Character Appraisal

Consultations, Publicity and Representations

Consultees

GBC Environmental Protection Officer

Since the previous (refused) prior approval application for this proposal, the noise impact assessment has been updated – ‘Noise Impact Assessment by MRL dated April 2025 (Report Ref: MRL/100/2161.1v1), This report includes updated noise measurements at the front and rear and a sound insulation test of the ceiling/floor partition between the commercial use on the ground floor and proposed flats above.

The report advises that at both the front of the property, with windows open, internal noise levels will exceed the criteria given in BS8233:2014 during both day and night. Noise mitigation will therefore be needed. At the rear, levels will be exceeded during the day but will be acceptable at night as the plant at the rear is said to be switched off at 11pm when the restaurant closes. **This does need clarification with the applicant as the opening hours of the restaurant are cited as being midnight and the premises licence is until 2am.**

Section 5 of the report provides glazing specification for the front and rear facades. With windows to this specification and kept closed, the criteria in BS8233 will be achieved. Additional ventilation will however be needed. The report recommends ventilation options in section 5.18 – these are all mechanical ventilation options.

The sound insulation test carried out for the partition between the existing commercial and flats above gave a level of 52 dB Rw – the floor is thick concrete slabs. This level is 9 dB in excess of the Building Regulation requirements so this is acceptable. The impact of the noise from the restaurant being transferred through the partition was also looked at using data from a restaurant in Maidstone. It's not clear however if the was just customer noise or involved the use of any amplified music? **Again, clarification is needed from the applicant regarding the use of music in the restaurant/bar.** Bearing in mind the quality of the floor/ceiling partition, this may not be an issue unless the music is played at a loud volume of with a heavy bass beat.

The plans show the windows as being fixed shut, so it appears that the applicant has taken note of the comments given on the previous application. In addition, Nuair fan data sheets and MVHR plans have been submitted. Unfortunately, the plans are not acceptable as intake vents are shown at the front of the premises. Being in an AQMA, this would result in polluted air being drawn into the flat which is what we are trying to avoid. The intakes need to be at the rear or via the roof and away from the roadside façade.

As before, the basement of the building is also used as part of the bar/entertainment area. The rear yard is potentially used as a smoking area and also acts as the fire exit for both basement and ground floor. It's noted that the existing emergency exit for the 1st floor at the rear will be blocked up.

The Private Housing Team need to be consulted, particularly about fire safety.

Conditions have been recommended below, but may need altering once the queries raised above have been addressed.

Air Quality:

- a) The applicant must submit a scheme of air quality mitigation for approval which should include the installation of an air system which positively pressurises the residential unit i.e. brings in more air than it extracts so that no air seeps into the residential unit through the fabric of the building or doors when people are entering and leaving etc. This requirement applies to the rooms on the first and second floor roadside of Milton Road. The scheme must include the following:

- a heat exchange unit,

- noise attenuation
- must bring in air from the upper most and furthest point away from the source of pollution i.e. the traffic on Milton Road, and
- must be sited away from other pollution sources e.g. flues, soil and vent pipes and must not bring in odour from any commercial extraction system.
- Windows to the affected rooms on the 1st floor shall not have trickle vents and shall be fixed shut.

The applicant will be provided with the checklist of points that must be considered and included in the scheme and which must be adequately demonstrated to the LPA by the submission of required information, plans, commitments etc. in order for the scheme to be approved.

- b) The approved scheme must be installed, **before occupation**. The installed scheme must be commissioned, before occupation, by an independent ventilation engineer to ascertain if the flow rates are correct and that it is fit for purpose i.e. that it fulfils its purpose of positively pressurising the residential units so that pollution cannot enter from the roadside and is not drawn into the property through the air system. The commissioning report must be submitted to the LPA including a signed declaration from the engineer that they are satisfied that it is fit for purpose it has been required for i.e. prevention of air pollution entering the building.

The LPA will visit the site following commissioning to ensure the approved systems are installed, seen working and are in the correct residential units etc.

Noise Mitigation Measures

The noise mitigation measures as detailed in report 'Noise Impact Assessment by MRL dated April 2025 (Report Ref: MRL/100/2161.1v1) (The Report) shall be implemented by competent persons. Prior to operation a post completion noise survey must be undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. The post completion testing shall assess performance of the noise mitigation measures against the noise levels as set in the Report.

If the mitigation measures tested in the post-completion report prove to be insufficient, additional noise mitigation measures (where necessary to ensure the appropriate noise levels can be met), shall be submitted and approved in writing by the Local Authority and installed and tested prior to operation.

The mitigation measures must be retained thereafter.

Following on from sharing the above with the applicant they submitted additional information and a further response was received from the Environmental Protection Officer:

The revised plan reference MP.2721.DWG.X.01.M.2000 Rev C5 demonstrates that the ventilation system can be positively pressurised. The location of the air intakes to the front flat have been altered so that air will now be taken in via the roof. This is acceptable and in terms of addressing the poor air quality in the area, the ventilation scheme is acceptable.

The following condition is advised in order to ensure that the ventilation scheme is installed and commissioned correctly and in accordance with the submitted details:

Air quality – mechanical ventilation scheme

The mechanical ventilation scheme must be installed in accordance with the submitted details and in particular plan WMP.2721.DWG.X.01.M.2000 Rev C5 **before occupation**. The installed scheme must be commissioned, before occupation, by an independent ventilation engineer to ascertain if the flow rates are correct and that it is fit for purpose i.e. that it fulfils its purpose of positively pressurising the residential units so that pollution cannot enter from the roadside and is not drawn into the property through the air system. The commissioning report must be submitted to the LPA including a signed declaration from the engineer that they are satisfied that it is fit for purpose it has been required for i.e. prevention of air pollution entering the building.

There are still several queries/concerns with regards to noise that were raised in the initial consultation response dated 7th July. These do not appear to have been addressed as yet.

A condition regarding noise was recommended on 7th July and this is still valid:

Noise Mitigation Measures

The noise mitigation measures as detailed in report 'Noise Impact Assessment by MRL dated April 2025 (Report Ref: MRL/100/2161.1v1) (The Report) shall be implemented by competent persons. Prior to operation a post completion noise survey must be undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. The post completion testing shall assess performance of the noise mitigation measures against the noise levels as set in the Report.

If the mitigation measures tested in the post-completion report prove to be insufficient, additional noise mitigation measures (where necessary to ensure the appropriate noise levels can be met), shall be submitted and approved in writing by the Local Authority and installed and tested prior to operation.

The mitigation measures must be retained thereafter.

GBC Private Sector Housing

We can confirm 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.

Environment Agency

No comments to make

KCC Highways Officer

Referring to the above description, it would appear that this development proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements. If there are any material highway safety concerns that you consider should be brought to the attention of the HA, then please contact us again with your specific concerns for our consideration.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway. Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

KCC Flood and Water Management

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits;
- b) Waste development;
- c) The provision of dwelling houses where:
 - i. The number of dwelling houses to be provided is ten or more; or
 - ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c) (i);
- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

Kent Fire and Rescue Service

Upon reviewing Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 in relation to converting from use Class E to use Class C3, I note conditions MA.3 where it does not meet the fire risk conditions of a) and b). Therefore, it would appear the Fire Service do not require a notification at this stage. Please refer to condition MA.2. to determine the suitability of this application.

I would like to note, however, that the access road leading to the proposed dwelling appears to be unaffected. Therefore, it is in my opinion, that the emergency access requirements under the above act appears to have been met at this stage.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

Neighbouring properties

The application has been advertised by site notice, press notice and letters to nine neighbouring properties.

No letters of representation have been received.

Officer's Analysis

Proposal

This application seeks planning permission for the conversion and change of use of first floor from E(B) to C3 use to provide 2 residential units comprising one 1 bedroom flat and one 2 bedroom flat.

The application site is a three storey terrace property with a restaurant at ground and first floor.

The proposal shows two flats proposed at the first floor. The front flat will be one bedroom with a lounge/kitchen/diner, a store and a bathroom. The rear flat will have two bedrooms, a lounge/kitchen/diner, store and a bathroom.

There will be no external changes and there is no existing or proposed parking.

The site is location within the Milton Place Conservation Area.

Housing Need

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

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

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in February 2025, it demonstrates that based on data up for the period 2024-2029, the Council can only demonstrate a land supply of 3 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). 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 paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);
- 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 129(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 '2' residential units would offer a minimum contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the Development Plan and NPPF (2024) which requires new development to be high quality, beautiful and create acceptable living conditions for future occupiers.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the National Planning Policy Framework (NPPF) and established local planning policy taken as a whole.

Principle of Development

The application site is located in the urban area, conservation area and air quality management area.

Policy CS05 of the Gravesham Core Strategy 2014 applies. This policy encourages a mix of employment and residential uses. Policy AP7 (Milton Road) of the Gravesham Local Plan 1994 also applies. This policy states that the 'Borough Council will maintain a flexible attitude to development proposals, particularly where it can be demonstrated that shopping is no longer a viable use. Non-office services and offices requiring a "shop window" frontage will generally be acceptable in this area.'

The principle of development is therefore acceptable provided it accords with the policies below.

Design, Character and Appearance

The application site is located within the Milton Place Conservation Area. The proposed development will not involve any external alterations to the front of the property and therefore will preserve the character and appearance of the area as well as the Conservation Area in accordance with policies CS19 and CS20 of the Gravesham Core Strategy 2014 and paragraph 135 and Section 16 of the National Planning Policy Framework 2024.

Amenity

Future Occupiers

The submitted plans show two flats.

Flat 1 has two bedrooms and an internal floor area of approx. 72.8sqm. The National Space Standards require an internal floor area of 70sqm for a two bedroom, four person dwelling and 2sqm of storage space which is met by this proposal. A double bedroom should be 11.5sqm and 2.75m wide and a single bedroom should have a floor area of 7.5sqm and at least 2.15m wide. The bedrooms meet these standards.

Flat 2 has one bedroom and an internal floor area of approx. 52sqm. The National Space Standards require an internal floor area of 50sqm for a two bedroom, four person dwelling and 1.5sqm of storage space which is met by this proposal. The proposed bedroom meets the national space standards mentioned above.

The lounge/kitchen/diners for both flats meet the adopted local residential standards.

All habitable rooms will have sufficient outlook and daylight for future occupiers.

As this is an application to convert an existing building there is no requirement for outside space. Notwithstanding this, there is public open space close to the property at the Gravesend Promenade.

Neighbouring Amenity

The proposal will not involve any external changes and therefore there will be no detrimental impact on any neighbouring property in terms of loss of outlook, privacy, sunlight or daylight.

Air Quality and Noise

Air Quality

The revised plan addresses the original concerns regarding the proposed ventilation system and therefore, subject to a condition ensuring the ventilation system is installed in accordance with these details, the proposal is considered acceptable.

Noise

A condition is recommended to ensure the proposed noise mitigation measures are implemented and a post completion report is produced before the flats are occupied.

Subject to the above conditions the proposed development will accord with policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135f of the National Planning Policy Framework 2024.

Ecology and Biodiversity

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 £337.49 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 applicants have paid towards the mitigation.

The proposal secures a contribution towards strategic mitigation measures within Special Protection Areas, and therefore the development complies with the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 193 and 194) of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Waste

No details have been provided with regards to waste storage however, a condition was imposed on the 20200702 application for the conversion of the top floor of the building and it is considered such a condition should also be imposed on this application with the view that the waste storage can be incorporated into the existing situation for the top floor flats.

Parking and Highways

The proposed development will increase the number of residential properties where there is no off road parking. The site is located in the town centre with all its facilities and close to public car parks. There is also a bus stop outside of the building and therefore it is in a highly sustainable location. On this basis there is no requirement for off road parking and no objections are raised.

The proposed development therefore accords with policy CS11 of the Gravesham Core Strategy 2014.

Conclusion

The proposed conversion of the first floor of the building will have no detrimental impact on the character and appearance of the street scene, conservation area, amenities, parking or highway safety and therefore accords with the abovementioned policies and is recommended for approval.

Recommendation:

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

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	4 November 2025	Dated:	4th November 2025