
PLANNING COMMITTEE REPORT

Application Ref:	20200561
Site Address:	Former St Johns Ambulance, Brigade H Q, Armoury Drive, Gravesend
Application Description:	Demolition of vacant brick buildings and erection of 2 no. one bedroom bungalows and a two storey block containing 4 no. two bedroom flats with associated access from Albert Murray Close and Armoury Drive, car parking, landscaped amenity and ancillary enclosures.
Applicant:	Gravesham Borough Council
Agent:	Ms Anna Kadziolka, BPTW
Ward:	Central
Parish:	Non-Parish Area
Decision due date:	30 October 2020; Extension of time until 27 November 2020
Publicity expiry date:	24 July 2020
Decision Level:	Planning Committee - 16 December 2020
Reason for referral:	The Council are the applicant.
Recommendation:	PERMISSION subject to conditions

Summary of Reasons for Recommendation

The proposal is to demolish the existing buildings and erect 2 no. one bedroom bungalows and a two storey block containing 4 no. two bedroom flats with associated access from Albert Murray Close and Armoury Drive, car parking, landscaped amenity and ancillary enclosures.

The application site is located within a residential housing estate close to the town centre. It is also adjacent to the Windmill Hill Conservation Area. Christ Church Crescent and Christ Church Road lie to the south of the site and contain predominantly late 19th century two storey terraced dwellings.

The properties surrounding the north and east of the site are of a 1990s construction and the proposed development is considered in keeping with these. The pattern of development creates a good relationship between the surrounding dwellings. The properties within the Conservation Area back onto the site however there is a clear distinction between the two areas and therefore the development is not considered to have a significant impact on the character and appearance of the adjoining Conservation Area.

The proposed development due to lower roof heights and land level differences will have no significant impact on surrounding properties in terms of amenity and no concerns are raised with regards to parking or highway safety.

Conditions to ensure no net loss of biodiversity occurs are recommended

This development proposal is considered to be compliant with the relevant policies in the Council's adopted Core Strategy, the relevant saved policies contained in the First Review and accords with National policy and guidance. Planning Permission, subject to the imposition of appropriate conditions is recommended accordingly.

MAIN REPORT

1. Site Description and Surroundings

- 1.1 The application site is an irregular L shaped plot of land of some 0.127 hectares. It is not in current use, and includes 2 buildings at the western edge, and an access drive extends to the vehicular access point on Armoury Drive to the east. There are also pedestrian accesses to the nearby Parrock Street and Trinity Road. The site is overgrown, with a mix of green areas and hardstanding. Ground levels fall across the site to the east, where there is also a short slope rising to the rear of properties in Christchurch Crescent. There are three mature trees at the western edge of the site which are subject to a Tree Preservation Order.
- 1.2 The site is adjoined by two storey semi detached dwellings on Albert Murray and Armoury Drive to the north and north east (on similar or lower ground levels), and mainly by terrace son Christchurch Crescent to the south (on slightly higher ground levels). Adjoining the south eastern corner is the recently extended and converted Former Barracks.
- 1.3 The character of the area is generally two storey terraces and detached dwellings, most with off road parking. The application site is located within a residential housing estate close to the town centre. It is also adjacent to the Windmill Hill Conservation Area. Christ Church Crescent and Christ Church Road lie to the south of the site and contain late 19th century two storey terraced dwellings.
- 1.2 The site forms part of the Milton Barracks and the buildings on it are of historic interest. The Kent Historic Environment Record notes them:
- Several buildings remaining from the Milton barracks complex, now mainly a housing estate. 3 buildings are an armoury, water tank and part of an enclosure wall (1860) and the officer's mess, (c. 1936) with some traces of the internal barracks road network.*
- 1.3 The whole barracks site was built in the early 1860s and used as a military site until the 1990s when it was redeveloped for residential use. The application site was then used as a depot by the St John Ambulance and has remained vacant and overgrown since 2014.

2. Submitted Documents/Plans

- 2.1 The application comprises the following documents and plans:

Application form received 18 June 2020.

Design and Access Statement received 18 June 2020.
 Preliminary Ecological Appraisal received 18 June 2020.
 Preliminary Investigation Report, associated maps and photos received 18 June 2020.
 Heritage Statement received 18 June 2020.
 Bat Emergence Survey Report received 12 August 2020.
 Aerial photo received 25 August 2020.
 Tree Preservation Order details received 21 August 2020.
 Drawing nos
 AMD-BPTW-ZZ-00-DR-A-2211 rev P02 received 14 October 2020.
 AMD-BPTW-ZZ-00-DR-A-0107 rev P01 (proposed site layout block plan) received 25 August 2020.
 AMD-BPTW-ZZ-00-DR-A-2005 rev P01 (existing and proposed elevation comparison) received 25 August 2020.
 AMD-BPTW-ZZ-00-DR-A-2211 rev P01 (site sections) received 25 August 2020.
 AMD-BPTW-XX-00-DR-A-0106 rev P01 (existing tree indicated for removal) received 25 August 2020.
 AMD-BPTW-XX-00-DR-A-0001 (site location plan) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-0101 rev P03 (proposed site layout) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-0100 rev P01 (existing site plan) received 18 June 2020.
 AMD-BPTW-ZZ-00-ST-A-5601 rev P03 (vehicle and pedestrian access strategy) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-0103 rev P02 (proposed site layout – roof plan) received 18 June 2020.
 AMD-BPTW-01-ZZ-DR-A-1701 rev P02 (flats floor plan layouts) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-0102 rev P02 (proposed site layout first floor) received 18 June 2020.
 AMD-BPTW-ZZ-00-ST-A-5901 rev P03 (refuse strategy) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-0105 rev P01 (proposed site layout) received 18 June 2020.
 AMD-BPTW-02-ZZ-DR-A-1702 rev P04 (bungalows floor plan layout) received 18 June 2020.
 AMD-BPTW-ZZ-00-DR-A-2003 rev P01 (bungalows front and rear elevations) received 19 June 2020.
 AMD-BPTW-ZZ-00-DR-A-2002 rev P01 (flats side elevations) received 19 June 2020.
 AMD-BPTW-ZZ-00-DR-A-2001 rev P01 (flats front and rear elevations) received 19 June 2020.
 AMD-BPTW-ZZ-00-DR-A-2210 rev P01 (proposed site section) received 19 June 2020.
 AMD-BPTW-ZZ-00-DR-A-2004 rev P01 (bungalows side elevations) received 19 June 2020.
 AMD-BPTW-XX-ZZ-DR-A-2201 (existing site elevations) received 19 June 2020.
 9329/1 (topographical survey) received 19 June 2020.

3. Relevant Planning History

3.1 None relevant for this site.

4. Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- Policy CS01: Sustainable Development
- Policy CS02: Scale and Distribution
- Policy CS10: Physical and Social Infrastructure

- Policy CS11: Transport
- Policy CS12: Green Infrastructure
- Policy CS14: Housing Type and Style
- Policy CS15: Housing Density
- Policy CS18: Climate Change
- Policy CS19: Development and Design Principles
- Policy CS20: Heritage and the Historic Environment

4.1 Paragraph 33 of the National Planning Policy Framework (2019) sets out those 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.

4.2 The Council undertook such a review in September 2019 and The review 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 a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the National Planning Policy Framework (2019), the Council will also seek to replace these saved policies via the emerging Local Plan.

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC3 – Development Affecting Conservation Areas

5. Other material considerations

National Planning Policy Framework (2019)

- 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 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- Kent Design Guide (SPG 5 published December 2005, adopted July 2006)
- Kent Vehicle Parking Standards (SPG 4 published in 2003 and adopted in 2006)
- GBC Residential Layout Guidelines (SPG2 February 1996)
- Housing Standards Policy Statement 1st October 2015
- Technical Housing Standards - Nationally Described Space Standards
- National Planning Practice Guidance
- Windmill Hill Conservation Character Appraisal

6. Consultations, Publicity and Representations

Environment Agency

We do not have any objections to the proposal subject to the following conditions being applied to any planning permission granted.

The previous use of the proposed development site presents a medium risk of residual contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site is located upon Principal aquifer overlain by a Secondary aquifer and is in a Source Protection Zone.

The Preliminary Risk Assessment report submitted with this application indicates a low to moderate risk, however given the underlying chalk aquifer and Source Protection Zone 1 setting the risks may be higher. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission, but respect that this is a decision for the Local Planning Authority.

In light of the above, the proposed development will be acceptable if a planning condition is included requiring the submission of a land contamination strategy, carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework.

Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition:

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.

(NB the submitted Soils Ltd report fulfils this part alone)

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning

authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

Condition:

Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.

Condition:

No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

Condition:

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning

Policy Framework.

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution treated materials can be transferred between sites as part of a hub and cluster project some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to the Position statement on the Definition of Waste: Development Industry Code of Practice and the Environmental regulations page on GOV.UK.

GBC Regulatory Services

Contaminated Land

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the CLEA guidelines and CLR 11 methodology) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) An intrusive site investigation, based on the findings and recommendations of the Preliminary Investigation Report from Soils Limited dated August 2019 Ref 17753/PIR_R26 shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- b) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- c) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.
- d) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report

together with the necessary documentation detailing what waste materials have been removed from the site.

e) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

Drainage

The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

Electric Vehicle Charging Point(s)

This Service would wish to see the inclusion of suitable electric vehicle charging facilities at the proposed dwellings in support of the Council's commitment to become carbon neutral by 2030.

Smoke Control

The property is located within the smoke control area and we would therefore ask for the following Informative to be included:

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 by emailing:

air.quality@gravesham.gov.uk

Code of Practice on Construction and Demolition

Please apply

KCC Archaeology

On the basis of the information that is available (including the informal response from Historic England) that the tower could be argued to be of local or regional significance. In weighing up the benefits of the proposed development against the retention of the water tower I could see it being argued that the development is the more important, socially and economically. I would like to have seen consideration for the incorporation of the tower into the development of the site but that does not seem to have been an option.

The ability to record the water tower should not be seen as a justification for its loss but certainly if it is to be demolished then it will need detailed archaeological recording before demolition. This historic building recording work and below-ground archaeological recording at the site could be secured by use of conditions and I recommend the following:

AR7 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of building recording in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that historic building features are properly examined and recorded.

And

AR1 *No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.*

Reason: To ensure that features of archaeological interest are properly examined and recorded.

GBC Highway Development Management Officer

The proposal is for small units with car parking that complies with car parking standards. It would be useful to have secure and weatherproof storage for 6 bicycles, but given the tight nature of the development and the proximity of the town centre they may not be required.

Neighbouring Properties

The application has been advertised by site notice, press notice and individual letters to 40 properties. 18 letters of representation have been received. Main concerns:

- Noise and disturbance
- Impact on local wildlife
- Lighting
- Restricted access during construction
- The bungalows are two storey, concerns regarding the flexible living space
- Loss of privacy, light and amenity
- Overdevelopment / Density too high
- Bats in the water tower

- Too close to rear of Christchurch Crescent
- Detrimental to the Conservation Area
- Cramped living conditions
- Loss of open views
- Involves demolition of buildings of interest
- Concerns regarding the build process due to proximity to neighbours
- Bin storage adjacent to residential properties and vermin issues
- Loss of green space
- Impact on public services
- Rights to light and impact on sunlight (*rights to light is a private matter*)
- Potential loss of trees

One letter of support has been received stating that the derelict buildings are an eyesore and raise no objection provided that the planned development is in keeping with the character of the area which borders the Conservation Area.

7. Planning Analysis

7.1 Proposal

This application seeks planning permission for the demolition of structures on site and the construction of two detached bungalows and a block of four flats with private amenity space and associated parking. The brick boundary wall to the west will be retained as well as the trees along this boundary.

The block of flats will be approx. 21m wide and 11.6m deep. It will be 7.7m high. At ground floor there will be 2no. two bedroom flats, and the lower level comprising kitchen/diner to the 2no. two bedrooms maisonettes. At first floor there will be two bedrooms and a living room to each of the maisonettes. Each of the flats will have an area of outside space to the rear and parking spaces to the front.

The bungalows will be approx. 10.9m deep and 7m wide. They will be 6.5m high at the highest point and will have offset dual pitched roofs (i.e. – not sharing a ridge line, but comprised of mono pitches at different heights). Internally there will be a bedroom, bathroom, kitchen/living/dining room at ground floor and a flexible living space at first floor. They will have rear gardens and an off road parking space for each dwelling.

A section of the enclosure wall has recently been rebuilt to the southern boundary and the proposal will be to extend this section to the southwest corner to the same specification to complete the boundary edge.

Vehicle access to the easternmost house will be to a parking space fronting Armoury Drive, and otherwise access to the remaining dwellings and further 6 car parking spaces will be via an extended carriageway on Albert Murray Close.

7.2 Principle of Development / Housing Need

The site is not currently in residential use, and has been in abeyance for an extended period of time. Given the very particular function of the prior use, and the constraints of the unusually shaped site and its residential surroundings, no objection is raised to the principle of residential use on the site. In regard to housing need, Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028)

and finds that there is a need for at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply. This engages the first part of footnote 7 of the NPPF (2019) and this means for decision-taking that planning permission for applications involving the provision of housing should be granted in line with the requirements of the NPPF (2019) Para 11(d) unless:

- i. the application of policies in this Framework (the NPPF) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.
- 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.

The proposed development for a net increase of 6 dwellings would offer a useful, but minimal contribution towards meeting this local need and, accordingly, officers considers that this should be accorded minimal weight in support of the application. However, this has to be balanced against other requirements of the NPPF (2019) and in particular paragraph 127, 130 and 133 - of the NPPF (2019) which requires development to be added to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

7.3 Character and Appearance

The application site is located within a residential housing estate close to the town centre. It is also adjacent to the Windmill Hill Conservation Area. Christ Church Crescent and Christ Church Road lie to the south of the site and contain late 19th century two storey terraced dwellings.

The site forms part of the Milton Barracks and the buildings on it are of historic interest. The Kent Historic Environment Record notes them:

Several buildings remaining from the Milton barracks complex, now mainly a housing estate. 3 buildings are an armoury, water tank and part of an enclosure wall (1860) and the officer's mess, (c. 1936) with some traces of the internal barracks road network.

The whole barracks site was built in the early 1860s and used as a military site until the 1990s when it was redeveloped for residential use. The application site was then used as a depot by the St John Ambulance and has remained vacant and overgrown since 2014.

The proposed development will result in two bungalows on the narrower strip of land to the west and a block of four flats to the east. There will be off road parking and private garden spaces for each dwelling. To the west of the site is a historic wall which is being retained. There will be a small part that will need to be rebuilt where the current building forms the boundary and will be demolished. The wall shall be rebuilt to match the existing and a condition can be imposed to ensure this.

The trees to the western boundary are protected by a Tree Preservation Order and will not be affected by the construction of the proposed scheme. A condition is recommended that tree protection measures are put in place during construction.

The proposal reflects the local vernacular outside of the Conservation Area and will not be readily visible from Christ Church Gardens. The closest dwellings were built in the 1990s are similar but not uniform with low eaves and low horizontal roof planes. The proposed scheme seeks to maintain a continuity of an active frontage and therefore a relationship

between the existing and proposed dwellings by aligning the properties. The proposed flat building is of a similar form and the bungalows are of a modern design. This design approach is not considered out of character with these more modern surrounding dwellings. The properties within the Conservation Area back onto the site however there is a clear distinction between the two areas and therefore the development is not considered to have a significant impact on the character and appearance of the adjoining Conservation Area. Full details of materials have been provided and can be controlled by condition.

Policy CS15 expects new residential development to achieve a minimum density of 40 dwellings per hectare. The proposed development is approx. 46 dwellings per hectare and therefore meets this criterion. The surrounding houses to the northeast as a comparison are at a density of 55 dwellings per hectare. The properties within the area are a mixture of type and size and the proposed properties reflect this character. The proposal does not therefore represent overdevelopment, and is considered to accord with Policies CS14 and CS15 of the Gravesham Local Plan Core Strategy 2014.

Archaeology

The site has been identified as a high potential for previously unrecorded military remains following an Archaeological Desk Based Assessment but no further remains were observed during a walkover survey. A process to monitor the identification, assessment and recording of any remains found on the site will be undertaken as part of the construction phase and a record of the buildings origin and use prior to demolition completed. This can be secured by condition.

The water tower on the site does have some historic interest, however, on consultation with Historic England, it was not felt worthy of listing. On balance, it is considered that, providing the water tower is adequately recorded prior to its removal, no objection is raised.

The proposed development therefore accords in these regards with the objectives of Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014 and Policy TC3 of the Gravesham Local Plan 1994 and section 16 of the National Planning Policy Framework 2019.

7.4 Amenity of Future Occupiers

Flats:

	GFA actual/Housing Standards	Double bedrooms 11.5sqm	Garden area 37.2sqm
Plot 4 flat 2b, 4p	70.4sqm/61sqm	Y	75sqm
Plot 3 flat 2b, 4p	87.9sqm/70sqm	Y	37sqm
Plot 2 flat 2b, 4p	87.9sqm/70sqm	Y	37sqm
Plot 1 flat 2b, 4p	70.4sqm/61sqm	Y	69sqm

Bungalows:

	GFA actual/Housing Standards	Double bedrooms 11.5sqm	Garden area 37.2sqm, 7.6m

			depth
Plot 5 bungalow 1b, 2p	70.4sqm/58sqm	Y	90sqm, approx. 5.5m <i>depth</i>
Plot 6 bungalow 1b, 2p	70.4sqm/58sqm	Y	85sqm, approx. 5.5m <i>depth</i>

As can be seen from the table above, all the units meet the National Space Standards in terms of floor area and Gravesham's Residential Layout Standards in terms of garden area. The shortfall in regard to garden depth is not considered to be harmful, given the low level of buildings proposed, which would not lead to poor levels of outlook or privacy due to that limited depth.

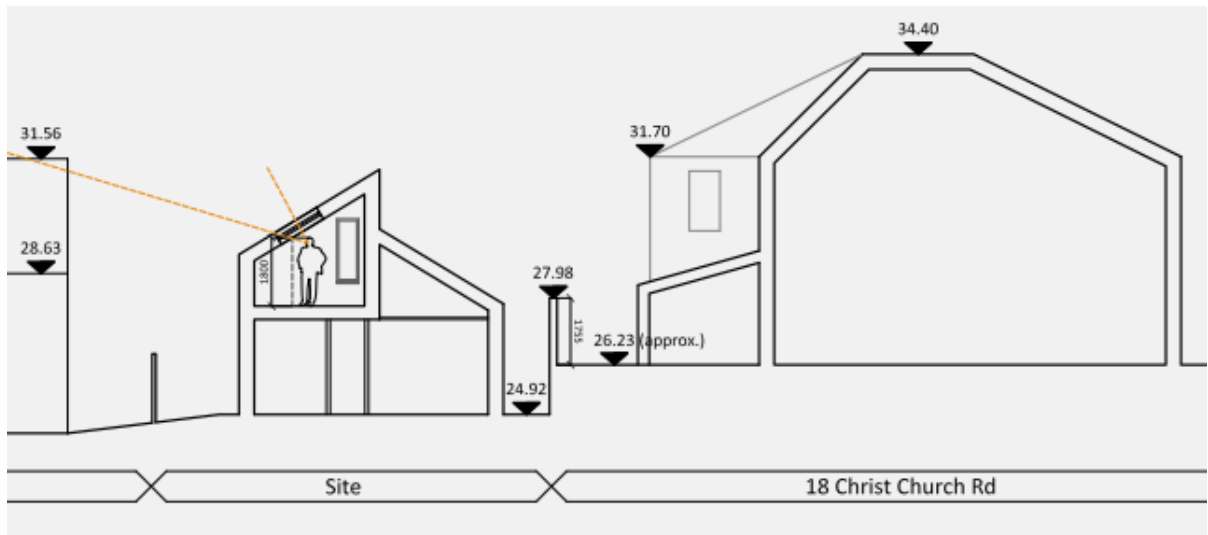
It is acknowledged that the retention of the protected trees on the western boundary will have an effect on the use of the flat gardens, and upon the light reaching several rooms within those flats. However, the gardens are of an adequate size, the accommodation exceeds the relevant internal space standards, and the main living spaces are not single aspect, so on balance the impact of the trees is not considered to be unduly limiting in regard to residential amenity. The flats provide for satisfactory levels of privacy and outlook otherwise.

The levels of light, outlook and privacy within the detached dwellinghouses is considered to be satisfactory. The rear gardens will be subject to a greater degree of overlooking than is typically seen, due to the short gardens, elevated land levels and angle of no.18 and 19 Christchurch Gardens in particular. However, subject to adequate landscape planting on the southern flank boundaries of the proposed gardens, adequate levels of privacy are considered to be able to be provided.

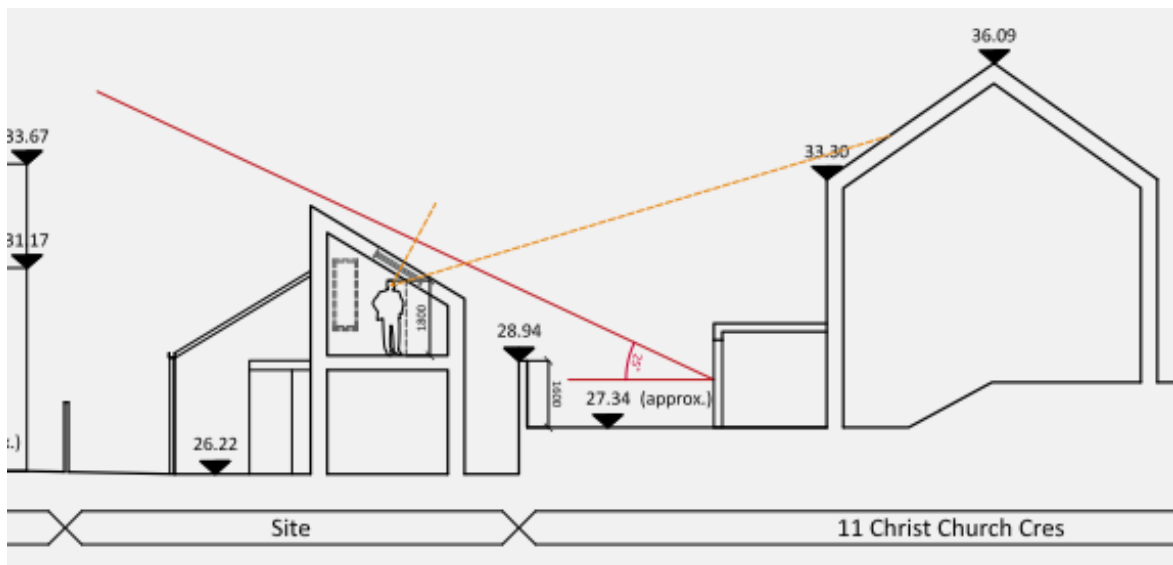
7.5 Neighbouring Amenity

Internally within the development the distance between the plot 5 bungalow and the flats is less than 21m, at approx. 17.2m and therefore there is a level of overlooking. There is also technically insufficient distance between the first floor windows of the 'flexible' space in the bungalows and the private outside space of the bungalows. On balance, the spacing between the front window of Plot 5 and the flats is considered acceptable. The rear windows of the flexible space can be fitted with obscure glass and fixed shut in order to avoid mutual overlooking of the rear gardens. This can be controlled by condition. There are rooflights in the southern flank. Plan no. 2211 shows that the outlook from these windows is skywards and will not result in overlooking into rear windows or gardens of Christchurch Crescent.

The houses in Christchurch Crescent are located to the south of the site. These have small gardens bounded by brick walls. The eastern bungalow (plot 6) will be single storey at approx. 3m in height at its closest edge, sloping up away from these properties. The two storey element will be approx. 6.5m high and approx. 9m away from the rear first floor windows of no. 18. The submitted section drawing shows that, due to the land level changes, any loss of outlook and daylight to these properties will not be significant.



No. 11 Christchurch Crescent is approx. 9.6m from the proposed two storey part of the western bungalow. Again, the submitted section drawing shows that there will be some loss of outlook to ground floor windows but this will not be significant.



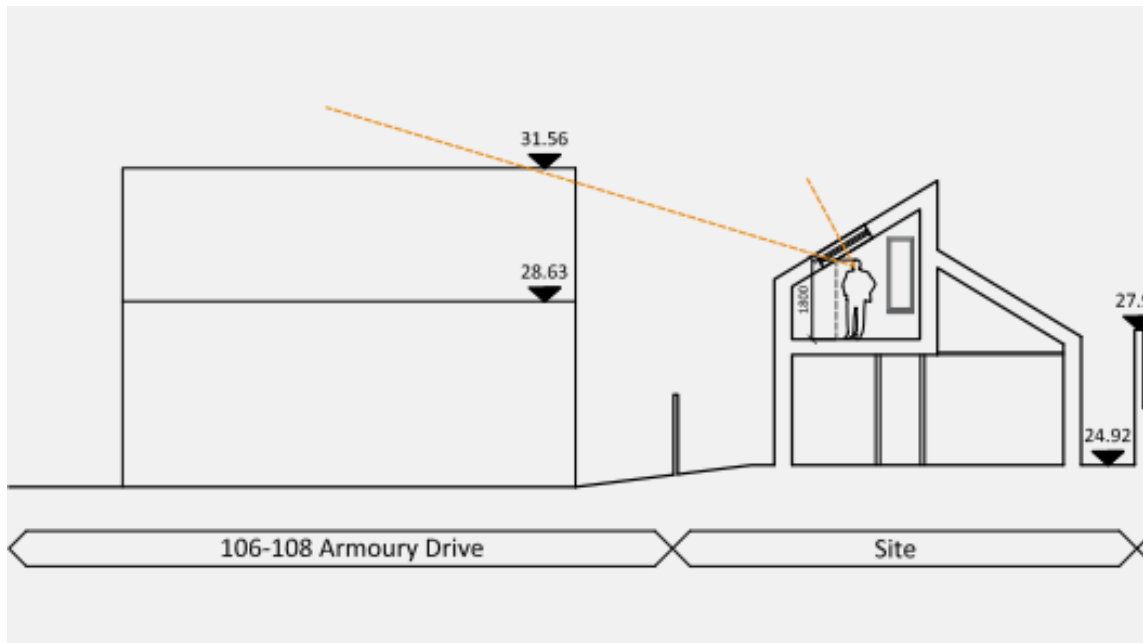
The proposed flats are approx. 12.8m from the first floor rear elevations of 1-9 Christchurch Crescent and therefore no concerns are raised with regards to loss of outlook. The first floor roof will be pitched away from these properties and, due to the lower land level of the site, will not appear overly dominant. There are no habitable room windows proposed facing these properties and therefore no concerns are raised with regards to loss of privacy.

6 Albert Murray Close is located to the north of the western bungalow (plot 5). The single storey element is closest to this property. No concerns are raised with regards to impact on amenity to this property.

14 Albert Murray Close is located to the north of the application site. The rear elevation will be over 11m away from the northern flank of the flats. There are no habitable room windows proposed in this northern flank and therefore there will be no impact on privacy. The flats will be further away from this dwelling than the existing water tower and therefore will not have a significant impact on outlook from the rear windows of this property. Due to

the path of the sun there will be no significant loss of sunlight or daylight to this dwelling.

No. 106 Armoury Drive is located to the north of the eastern bungalow (plot 6). The two storey element is to be built approx. 4.5m away from the southern flank of this property. Whilst the new building will be visible from this property it is not considered to result in any significant detrimental impact in terms of loss of outlook from bedroom windows to the rear, loss of sunlight, daylight or privacy.



Due to the path of the sun and the low height of the buildings proposed, any loss of sunlight or daylight is not considered significant.

The proposed development therefore accords with Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and para. 127f of the National Planning Policy Framework 2019.

7.6 Ecology and Biodiversity

Trees

There is a Tree Preservation Order (TPO) which runs along the western boundary of the site. One tree on site is proposed to be removed shown as T4 on the plans and is an acer. This tree is however not covered by the TPO and therefore no objection is raised to its removal, subject to adequate replacement planting. The Design and Access Statement states that the removed trees will be replaced on a 1:2 ratio and this can be controlled by condition to ensure no net loss of biodiversity.

Landscaping

No details have been provided of hard and soft landscaping and therefore a condition is required to ensure this is submitted at a sufficiently early stage.

Ecology and Biodiversity

A preliminary ecological appraisal has been undertaken and the site was assessed to be low to negligible ecological value. There was low potential to support roosting bats, high

potential to support nesting birds and low potential to support hedgehogs. The report advises that a re-entry survey is recommended to confirm presence/likely absence of roosting bats and inform mitigation, compensation and enhancement actions. It is also recommended that any clearance of vegetation on site should be undertaken outside of the nesting bird season (March-August inclusive). This can be controlled by condition. Bird and bat boxes and invertebrate features are proposed to be incorporated and this can be controlled by condition.

A further bat survey was commissioned as the preliminary appraisal identified low potential for roosting bats. This survey was undertaken on 27 July 2020 and confirmed likely absence of roosting bats, moderate levels of bat commuting and foraging common pipistrelle and Nathusius' pipistrelle and a single pass by a soprano pipistrelle and a noctule. No further survey or formal mitigation actions are considered to be required, however enhancements to be implemented as part of the wider site development to improve opportunities of the site to both roosting, foraging and commuting bats post construction are encouraged.

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 £250.39 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.

Whilst the development would not exert a significant impact in isolation upon the SPA, the applicant has paid a contribution towards strategic mitigation measures within Special Protection Areas, and therefore the development, subject to the above conditions, complies with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 175 and 176) of the National Planning Policy Framework 2019 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

7.7 Refuse

Details of reuse collection have been provided and are considered acceptable. An informative is recommended reminding the applicant of the refuse requirements.

7.8 Parking and Highways

The proposal is for small units with car parking levels that complies with car parking standards. There will be one visitor space in addition to the single parking space designated for each dwelling. Secure and weatherproof storage for 6 bicycles will also be secured by condition.

No objection is raised in terms of parking or highway safety.

The proposed development, subject to conditions, is therefore considered to comply with the objectives of Policy CS11 (LPCS) and Policies T1 and T5 of the Gravesham Local Plan 1994.

8. Conclusion

- 8.1 The proposed development, subject to conditions listed below, is not considered to have any significant detrimental impact on the character or appearance of the street scene or adjacent Conservation Area, neighbouring amenities, biodiversity, parking or highway safety and therefore accords with the abovementioned Policies and is recommended for approval. For the avoidance of doubt the agent has agreed to inclusion of pre-commencement conditions.

RECOMMENDATION

PERMISSION subject to conditions, reasons and informatives

CONDITIONS AND REASONS

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Application form received 18 June 2020.

Design and Access Statement received 18 June 2020.

Preliminary Ecological Appraisal received 18 June 2020.

Preliminary Investigation Report, associated maps and photos received 18 June 2020.

Heritage Statement received 18 June 2020.

Bat Emergence Survey Report received 12 August 2020.

Aerial photo received 25 August 2020.

Tree Preservation Order details received 21 August 2020.

Drawing no AMD-BPTW-ZZ-00-DR-A-2211 rev P02 received 14 October 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0107 rev P01 (proposed site layout block plan) received 25 August 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2005 rev P01 (existing and proposed elevation comparison) received 25 August 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2211 rev P01 (site sections) received 25 August 2020.

Drawing no. AMD-BPTW-XX-00-DR-A-0106 rev P01 (existing tree indicated for removal) received 25 August 2020.

Drawing no. AMD-BPTW-XX-00-DR-A-0001 (site location plan) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0101 rev P03 (proposed site layout) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0100 rev P01 (existing site plan) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-ST-A-5601 rev P03 (vehicle and pedestrian access strategy) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0103 rev P02 (proposed site layout – roof plan) received 18 June 2020.

Drawing no. AMD-BPTW-01-ZZ-DR-A-1701 rev P02 (flats floor plan layouts) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0102 rev P02 (proposed site layout first floor) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-ST-A-5701 rev P03 (fire strategy) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-ST-A-5901 rev P03 (refuse strategy) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-0105 rev P01 (proposed site layout) received 18 June 2020.

Drawing no. AMD-BPTW-02-ZZ-DR-A-1702 rev P04 (bungalows floor plan layout) received 18 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2003 rev P01 (bungalows front and rear elevations) received 19 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2002 rev P01 (flats side elevations) received 19 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2001 rev P01 (flats front and rear elevations) received 19 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2210 rev P01 (proposed site section) received 19 June 2020.

Drawing no. AMD-BPTW-ZZ-00-DR-A-2004 rev P01 (bungalows side elevations) received 19 June 2020.

Drawing no. AMD-BPTW-XX-ZZ-DR-A-2201 (existing site elevations) received 19 June 2020.

Drawing no. 9329/1 (topographical survey) received 19 June 2020.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. No development shall commence until a plan is submitted to the Local Planning Authority for approval showing a scheme of landscaping (hard and soft) and boundary treatment. The planting shall include two trees for every tree lost to the development including tree T4 shown for removal on drawing AMD-BPTW-XX-00-DR-A-0106 . All planting, seeding and turfing comprised in the approved scheme of landscaping shall be implemented during the first planting season following occupation of the buildings or completion of the development, whichever is the earlier. Any trees or plants which within 5 years of planting are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless the Authority gives written consent to any variation. The hard landscaping shall include details of the permeable drive surfaces.

Reason: To protect and enhance the appearance and character of the site and locality in accordance with Policy CS19 of the Core Strategy and paragraph 127 of the National Planning Policy Framework (2019).

4. No development approved by this planning permission shall commence until a remediation

strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - All previous uses;
 - Potential contaminants associated with those uses;
 - A conceptual model of the site indicating sources, pathways and receptors; and
 - Potentially unacceptable risks arising from contamination at the site.NB the submitted Soils Ltd report fulfils this part alone
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

5. Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

6. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.

7. No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

8. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

9. No development shall commence above ground until details of the facing materials including bricks, tiles, rainwater goods, windows and doors, to be used in the construction of the external surfaces of the dwelling hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy CS19 of the Gravesham Local Core Strategy 2014.

10. Notwithstanding the provisions of Article 3 Class A of Part 1 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any provision equivalent to those Classes in any statutory instrument revoking and re-enacting that Order, with or without modification), no windows, doors or other openings (other than those shown on the approved plans) shall be formed at any time in either flank elevation of the detached dwellinghouses (Plots 5 & 6) hereby approved without the prior written consent of the Local Planning Authority having first been obtained.

Reason: In order that any proposal to insert openings into the flank elevations of the dwelling shall be subject of a planning application that the Local Planning Authority would wish to determine on its merits, having particular regard to protecting the privacy and amenity of adjoining properties.

- 11 The bathroom windows shown in the flank walls at first floor of the flats (Plots 1 & 4) and the first floor rear windows of the detached dwellinghouses (Plots 5 and 6) shall be fitted with obscure glass (to a level at least equivalent to Level 3 on the Pilkington Scale) and, apart from any top-hung light above 1.7m above internal finished floor level, shall be non-opening. This work shall be carried out and completed before the rooms are occupied and shall be retained at all times thereafter.

Reason: To ensure the development does not prejudice conditions of amenity by reason of unneighbourly overlooking in accordance with Policies CS19 of the Core Strategy 2014.

12. Notwithstanding the provisions of Classes A, AA, B, C and E of Part 1 of Schedule 2, Article 3 the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking and re-enacting that Order with or without modification) no development shall be carried out to the approved dwellinghouses (Plots 5 & 6) without the prior written consent of the Local Planning Authority having first been obtained .

Reason: To enable the Local Planning Authority to control such development in the interests of amenity, in accordance with Policy CS19 of the Core Strategy 2014.

13. Prior to the first occupation of the development hereby permitted, vision splays of 2.0m x 2.0m shall be provided on both sides of the vehicular access points (excluding at the northern side of the vehicle access to Plot 6) and no obstruction of sight more than 0.6m above carriageway level shall be permitted within the splays thereafter.

Reason: To safeguard highway safety in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014).

14. The vehicle parking areas shown Drawing no. 0105 rev P01 shall be formed, surfaced and drained prior to first occupation of the dwelling hereby approved. Thereafter, notwithstanding the provisions of the Town and Country (General Permitted Development) Order 2015 as amended, or any provision equivalent to it in any statutory instrument revoking and re-enacting that Order, no development shall be carried out on the site in such a manner or in such a position as to preclude the use of or access to the vehicle parking areas.

Reason: To ensure sufficient off street car parking provision to serve the development, in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014).

15. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of building recording in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that historic building features are properly examined and recorded, in accordance with Policy CS20 of the Gravesham Local Plan Core Strategy (September 2014).

16. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded, in accordance with Policy CS20 of the Gravesham Local Plan Core Strategy (September 2014).

17. Any repairs to the boundary wall to the west and south of the site shall be made using materials matching those that are in situ unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard conditions of amenity in relation to the adjoining Conservation Area in accordance with Policy CS20 of the Gravesham Local Plan Core Strategy 2014.

18. Site clearance shall be undertaken outside of the bird nesting season (March to August inclusive).

Reason: In the interests of ecology and in accordance with the provisions set out under Policy CS12 of the Gravesham Local Plan Core Strategy.

19. In this Condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars; and paragraphs a) and b) below shall have effect until the expiration of 5 years from the date of occupation of the building for its permitted use.

- a) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved plans and particulars. Any pruning approved shall be carried out in accordance with British Standard 3998 (Tree Work).
- b) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time as may be specified in writing by the Local Planning Authority.
- c) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with British Standard 5837:2012 and details submitted to and approved by the Local Planning Authority before any equipment, machinery or materials are brought on to the site for the purposes of demolition and development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this Condition and the ground levels within those areas shall not be altered, nor shall any excavation be made without the written approval of the Local Planning Authority.

Reason: To protect and enhance the appearance and character of the site and locality, in accordance with Policies CS12 of the Gravesham Local Plan Core Strategy 2014.

20. No dwelling hereby permitted shall be occupied until details of ecological enhancement measures including bat and bird boxes have been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be provided before the building is occupied and shall be thereafter be retained.

Reason: In the interests of ecology and in accordance with the provisions set out under Policy CS12 of the Gravesham Local Plan Core Strategy.

21. Prior to the installation of any external lighting on the site, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. Details shall include height, position, external appearance, any shielding, light intensity, colour, spillage (such

as light contour or lux level plans showing the existing and proposed levels) together with a report to demonstrate its effect on the landscaping of the site (including an overlay of the proposed lighting onto the site landscaping plans), nearby residential properties, bats (including reference to the recommendations of the Bat Conservation Trust) and of how this effect has been minimised. Any external lighting shall be implemented in accordance with the approved details.

Reason: In order to limit the impact of the lighting on the landscaping of the site, nearby residents and wildlife and with regard to Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

22. Within three months of the commencement of development, details of secure, covered and accessible cycle storage facilities (comprising a minimum of 6 spaces) to serve the development shall be submitted to and approved in writing by the Local Planning Authority. The approved cycle storage facilities shall be provided prior to first occupation of the development and shall be retained for such purposes at all times thereafter.

Reason: In order to encourage options for sustainable travel in accordance with Local Plan: Core Strategy Policy CS19.

INFORMATIVES

- Statement of positive and proactive approach to decision-making;
- Code of Construction Practice
- Reason for imposition of pre-commencement conditions;
- Deviation from approved plans;
- Building regulations and party wall act;