
Appeal Decision

Inquiry Held on 10 and 11 September 2019 and 10 March 2020

Site visit made on 10 March 2020

by D Fleming BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 20 April 2020

Appeal Ref: APP/A2280/C/18/3197399

Building G, land rear of 48-52 Napier Road, Gillingham, Kent ME7 4HD

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
- The appeal is made by Mrs J Sangha against an enforcement notice issued by Medway Council.
- The enforcement notice was issued on 15 February 2018.
- The breach of planning control as alleged in the notice is without the benefit of planning permission, the change of use to six self-contained flats.
- The requirements of the notice are:
 - Cease the use of the building (Shown as Building G on the plan attached to the notice) for residential purposes;
 - Remove all fixtures and fittings that facilitate the unauthorised residential use;
 - Remove all internal stud/partition walls that facilitate the unauthorised residential use; and
 - Remove all separate gas and electricity meters serving the unauthorised residential use.
- The period for compliance with the requirements is six months in respect of the use and seven months in respect of the removal works.
- The appeal is proceeding on the grounds set out in section 174(2)(d) of the Town and Country Planning Act 1990 as amended.

Summary of Decision: The appeal succeeds in part but otherwise the appeal fails, and the enforcement notice, as varied, is upheld as set out in the Formal Decision.

Application for costs

1. At the Inquiry applications for costs were made by both the Council and the appellant. These applications are the subject of separate Decisions.

Background

2. This appeal has been made in respect of a two storey building situated at the rear of a large site, which is behind other buildings, seemingly in various commercial uses. Access to it is not through the commercial yard but via an alleyway between adjacent houses. Building G has been converted into six flats with three on each floor, known as Nos 46A-F Napier Road, with flats A-C being on the first floor.

3. Prior to the issue of the current notice, the Council investigated a complaint about an unauthorised residential use of the upper floor which led to the issue of an enforcement notice in January 2010 (the 2010 notice). This alleged a change of use of the upper floor to two residential flats. The requirements of the notice were to cease the residential use and to remove the fixtures and fittings that facilitated the use. No appeal was made in respect of this notice and the Council state that there is no evidence that this notice was complied with.

Procedural Matters

4. The Inquiry initially opened on the 10 September 2019 and was scheduled to last for three days. After the first day of the Inquiry the appellant found a large folder of new evidence and requested an adjournment part way through the second day so that she could submit the material. After seeking the views from both parties, it was decided, in the interests of natural justice, that the new evidence could be submitted and so the Inquiry was adjourned to enable this to take place and for comments to be made by the Council. The Inquiry then resumed on 10 March 2020.
5. All of the oral evidence to the Inquiry was taken under oath or affirmation and the appellant and one witness were assisted in giving their evidence by interpreters.
6. The two original rent account receipt books (the rent books) were available to me at the Inquiry and overnight. They comprise the carbon copies of the receipts given out to the tenants as they paid their rent. In many places the carbon ink has faded to such a degree that it is illegible. The appellant photocopied all the pages and submitted them with her statement. However, the copies were poor quality and at the Inquiry she provided further copies. In making these further copies she has inked over the faded addresses, amounts and dates so that they are clearer on the photocopy. Having inspected the originals, I believe this has been done in good faith and I could not see any evidence of dates being changed or addresses added to or altered on the photocopies. The Council also accepted that this was the case.
7. On the second day of the Inquiry the Council and I were given copies of a third rent book and again had sight of the original. Book 3 is more recent and so the ink has not faded to the same degree. The photocopies are therefore more legible and the Council agreed that this was the case.
8. On the third day of the Inquiry the Council and I were given copies of all three rent books with all the pages numbered.

The Notice

9. The appellant claimed that the plan accompanying the notice was defective in that it showed more land than necessary to identify the site of the breach of planning control. The building the subject of the notice is one of a number on a large site and the Council had outlined all of them in red when it was only necessary to outline the appeal building to identify the site (which is Building G, as identified by the Council). The Council provided an amended plan and I am satisfied that no injustice would be caused by substituting the amended plan as the area of land identified will be smaller. I will therefore vary the notice to substitute the amended plan.

The appeal on ground (d)

10. This ground of appeal is that at the date when the notice was issued, no enforcement action could be taken. The burden of proof in an appeal on this ground lies with the appellant. As such, she needs to show, on the balance of probabilities, that the use of each of the six self-contained flats in Building G began more than four years before the notice was issued and continued, without material interruption, for a period of four years thereafter. The notice was issued on the 15 February 2018 so the appellant needs to show that the material change of use for each flat began not later than 15 February 2014 and continued without material interruption.
11. The Council submit though that there is a second determining issue which is whether the 2010 notice precludes the appellant succeeding on her ground (d) appeal in respect of the upper floor of the property.
12. At the Inquiry the parties were asked to address this point in their closing submissions. Although the appellant submits that the 2010 notice is not before me, the facts are that it was not appealed, it took effect and it remains extant. Furthermore, it is not the wording of the allegation, the use of the upper floor as two flats that is pertinent to the current appeal but it is the requirements of the notice. The requirements in the 2010 notice were to cease the use of the upper floor 'for residential use'. As such, section 181 of the Act applies, the residential use of the upper floor should be discontinued permanently and the resumption of that use by the appellant in creating three flats for rent by various tenants is, in my view, in contravention of the 2010 notice.
13. The appellant also seeks to go behind the 2010 notice but I find that it is lawful and there has been no challenge to its lawfulness. In addition, if the Council were to bring a prosecution under section 179 of the Act, this would be because the steps required to be taken by the notice had not been taken. The defence open to the appellant would be to show that she had done everything she could be expected to do to secure compliance with the notice. Seeking to challenge the framing of the allegation would not be a defence as it was open to her to lodge an appeal before the 2010 notice came into effect.
14. For these reasons, it is therefore concluded that in respect of Flats A, B and C on the first floor the appeal on ground (d) fails. The appeal will now continue in respect of Flats D-F on the ground floor only.

The appellant's case

15. The appellant has owned the site since 2002 and submits that her late husband converted Building G into 6 self-contained flats in 2013. The three flats (Addresses 46 D-F Napier Road) on the ground floor were finished in early 2013. Lettings began in 2013, as evidenced by rent book 1 and other documents. A number of witnesses, including an existing tenant and two former tenants confirmed that the use of each flat was continuous save for breaks of a few weeks between tenants, which the appellant submits does not break the continuous use.

The Council's Case

16. In July 2015 Council officers witnessed that there had been a breach of planning control in that self-contained flats had been created within Building G and photographs were taken at a site visit. The Council have no record of any

application or Building Regulation approval for the conversion works. Council Tax records in respect of each flat began only in April 2016 for all the flats.

Assessment

17. To a large extent the appellant relies on the rent books to demonstrate when the use of each flat began and that the use has continued for the relevant period. Books 1 and 2 were tested under cross examination by the Council together with a share certificate document, which was in relation to Flat D. However, all of the other evidence submitted during the adjournment was not examined under oath as the appellant chose not to recall any witnesses. The Council were most concerned about this but stated that they would deal with it in closings. In addition, the appellant has not explained the provenance of the documents. I will address these points as I deal with each flat.

Flat D

18. In respect of Flat D, the earliest rent receipt is dated the 12 November 2013 and there are continuous monthly payments thereafter until 10 April 2018. However, there are also gaps, namely from the end of October 2014 to March 2015 when no receipts are shown and three occurrences when there is a gap of one month.
19. Mrs Qamar and Mr Rana state that they lived at Flat D from the 15 October 2013 until June 2018 when they moved into another property owned by the appellant. They gave evidence to the Inquiry in addition to their witness statements and stated that they paid their rent in cash to Mr Sillett, the appellant's employee, who was in day to day charge of the flats. He works in the bathroom showroom in the commercial yard and lives in the flat above the showroom.
20. The appellant also submits other documents to demonstrate the residential use of Flat D. These are
- a bank statement dated the 3 December 2013 addressed to Miss Qamar at Flat 46A Napier Road;
 - a share certificate dated the 2 December 2013 for Tabinda Qamar at 46 Napier Road;
 - two Council tax bills dated the 17 February (for the period 1 April 2016 to 31 March 2017) and the 10 March 2017 (for the period 1 April 2017 to 31 March 2018) with regard to Flat 4, 46 Napier Road;
 - a tenancy agreement dated the 15 June 2017 for a one bedroom flat at 46D Napier Road between Mrs Qamar and the appellant, signed by both parties; and
 - payment of rent statements from Goldex Sales and Lettings dated the 8 February 2018, the 7 March 2018 and the 10 April 2018 in respect of 46D Napier Road.
21. The Council accept the appellant's analysis of all the rent book receipts, including book 3 submitted during the adjournment, but question the accuracy and the reliability of the books. This is because Mr Sillett stated initially when tenants first moved in, there were no receipts given out; the appellant's husband just collected the money. It was only when the appellant and her

husband went to India that Mr Sillett began using invoice books from the shop to provide receipts around September 2013. He stated their record is not comprehensive but that it is fairly comprehensive as other people in the shop sometimes took rent money and put it directly into the safe. When it was busy staff may have forgotten to provide a receipt. So, it does not follow that gaps in the payment of rent meant someone had moved out.

22. Initially, the flats had no particular address when the appellant's husband collected the rent. When Mr Sillett took this task on, he assigned each flat a number and in November 2014 this became a letter so Flat 1, 46 Napier Road became Flat A, 46 Napier Road. He introduced addresses to distinguish between those who had paid and those who had not.
23. Mr Sillett also said he did not record the receipt of rent after May 2017; that he collected the rents until the summer of 2018; that he stopped using a rent receipt book when the book went missing and that there was not a third rent book even though his signature is on the receipts within that book, which finishes in December 2017.
24. Whilst there are some discrepancies in Mr Sillett's oral evidence about the collection of rent, overall, I find his evidence is plausible. Mr Sillett's explanation about the addresses of each flat also explain why Mrs Qamar's bank statement is addressed to 46A and the share certificate gives the address as 46 Napier Road. This was in the early days of occupation before matters were sorted out in relation to how each flat was identified. In addition, it is credible that this changed as the access to the flats is narrow and the postman was unable to push his cart along the path and deliver post to each flat. He therefore left all mail for tenants at the bathroom showroom counter. Mr Sillett said some post went missing which was another reason why he introduced clear addresses.
25. Mr Sillett's recall of when he stopped collecting rent is also understandable as he not only collected rent for these flats but lots of other properties in the ownership of the appellant and worked six, sometimes seven days a week for the appellant. The missing rent books were also a problem for the appellant at the Inquiry as initially only books 1 and 2 were submitted with her appeal and book 3 was found at the end of day 1 of the Inquiry.
26. The Council casts doubt on the tenancy agreements as initially there were no agreements. Mr Sillett said he made a list of all the tenants and their passport details and kept it on a single sheet of paper. At some point later on, he downloaded template tenancy agreements off the internet to use. He admitted he did not really know what he was doing but he was trying to do the right thing. He only gave tenants the first page of the agreement as he did not know whether the flats were furnished or unfurnished. After the appellant's husband died in 2016 full tenancy agreements were produced which Mr Sillett took to the appellant to sign. The tenancy agreement submitted for Flat D is a full agreement and not an example of a draft as submitted on day 2 of the Inquiry.
27. Whilst neither the tenant nor the appellant who signed the 2017 agreement were re-called to be cross examined about the document, I find Mr Sillett's explanation as to how the full tenancy agreements came into being to be plausible. In addition, Mr Sillett's explanation about how the management of

the flats changed after Mr Sangha's death is not implausible and as such, I therefore give the document some weight.

28. Following the death of Mr Sangha, the rent payment procedure was also updated so that tenants made payments via bank accounts to the letting agent. The evidence shows that these begin in February 2018 for Flat D and continue until 14 April 2018. The remaining documentary evidence for Flat D relates to Council tax and paperwork for the year 2017 that is backdated to 1 April 2016. This is consistent with information provided by the Council who state that after their visit in August 2015, all the flats were liable for Council tax in April 2016. I therefore give it significant weight.
29. Finally, in response to the documentary evidence, the Council point out that Mrs Qamar and Mr Rana did not produce the top copies of the rent receipts or any other personal records of the rent they paid which could cross reference the rent books. However, it is not clear whether the former occupiers of Flat D kept their receipts once they moved out or indeed that they kept them in the first place for the whole of their tenancy when the flat only provides space for necessities. It is also not known what other personal records they could provide when Mr Sangha required payment in cash.
30. In terms of the oral evidence from the former occupier of Flat D, Mrs Qamar confirmed what was said by Mr Sillett, that the flats were given individual addresses 'because of mail sorting' issues. She also said she was the first occupier of her flat. Mr Rana also stated that just before they moved in, in October 2013, Flat D was empty.
31. The evidence from other witnesses in relation to the occupation of Flat D is less detailed. All the witness statements are remarkably identical and make use of the same words and phrases. Each witness stated that they wrote their own statement but also that the appellant's nephew helped them. Overall, I find the other evidence to be more compelling.
32. The oral evidence from the other witnesses is also less precise in terms of when the use began and who occupied each flat. Mr Eze said he moved into 36 Napier Road in August 2014, the property on the north side of the alleyway providing access to the appeal site. This was six months after the relevant date. He remembers seeing lots of people coming and going and parking their cars in front of his house over the years but from his property he cannot see the entrance doors of Flats D-F. He also knew the names of some occupiers, that he had had a drink with them and attended two birthday parties but he did not remember in which flat or what year.
33. Mrs Adegbite-Enwereji, who occupies Flat C, confirms Mrs Qamar and Mr Sillett's explanation about the addresses. She moved into her flat during Christmas 2013 and she remembers this date as she recalls the age of her second child. She stated when she first arrived the address was 40 to 46 Napier Road and this was 'really hard to get used to', it then became Flat C, 46 Napier Road.
34. Although Mr Chrzaszcz has occupied 34 Napier Road since May 2013, he has never been in any of the flats and he does not know any of the occupiers of Flats D-F. The access door to his flat is within the side of the building in the alleyway leading to Flats D-F and from his windows he can see people coming

- and going but he works long hours and his recollections were vague in terms of dates.
35. In addition, the appellant's oral evidence lacks detail. Although she states she has dealt with the finances since her husband died 'for example paying utility bills for the flats', she does not exhibit these bills. It appears she moved into 32 Napier Road in 2013 and from her house she could see building work taking place but could not provide any firm date as to when it started, other than 2013, or when it ended. She knew Mrs Qamar and had been inside her flat a couple of times but did not know how long she had lived there.
36. The Planning Practice Guidance advises that if a local planning authority has no evidence itself or from any others to contradict or otherwise make the appellant's version of events less than probable, there is no good reason to reject it. This is provided the appellant's evidence alone is sufficiently precise and unambiguous, on the balance of probabilities.
37. It has been held in case law that in assessing when the change of use of premises to residential use has taken place, the physical state of the premises is very important but it is not decisive. The actual, intended or attempted use is also important but again, it is not decisive, as these matters have to be looked at in the round.
38. In respect of Flat D, whilst there is no documentary evidence as to when the flat was created, Mr Sillett recalled that building work was happening in 2013, that it continued 'for about four or five months till about October 2013 or a bit longer' and that 'it (the building works) started on the ground floor and then they were all over the place'.
39. With regard to continuous residential use, the occupiers stated this began in October 2013. I note that they provide an exact start date, which is the 15 October and that in the rent books they have generally paid their rent either on or around this date. This adds weight to their statements that they moved in on the 15 October 2013. The rent book evidence shows that payments began in November 2013 and the bank statement dated December 2013 shows that the tenants were also at 46 Napier Road. The other documentary evidence from the appellant for this flat supports the oral evidence. Notwithstanding that the provenance of the Goldex statements is unclear, these are not needed to demonstrate four years continuous use in respect of Flat D as this is already shown to have occurred in the main from the rent books.
40. The Council are concerned that there are gaps in the rent book record, especially the four month gap between October 2014 and March 2015. However, it seems unlikely that these tenants vacated the property in this period and then returned to occupy it. I believe this to be the case as Mr Sillett stated, 'gaps in the rent book do not mean that the tenants were not there' and also that sometimes tenants paid missing rent at the same time as their usual rent. I saw that there was evidence for this in January 2014 when there are three payments for Flat C.
41. The Council are also concerned that the documentary evidence is inaccurate and does not corroborate all the evidence. However, notwithstanding some inconsistencies in the evidence and some evidence that is unexplained, the test of it is the balance of probabilities. That balance of the evidence need only be

slightly more than half in order to satisfy the test but that is not to say that the Council submissions are not unwarranted. If there is no evidence to contradict or otherwise make the appellant's version of events less than probable, the appellant's evidence alone may be sufficient for the ground (d) appeal to succeed, provided that it is sufficiently precise and unambiguous.

42. Therefore, having regard to the totality of the evidence, it is concluded, on the balance of probabilities, that the use of Flat D as a self-contained residential unit took place more than four years before the issue of the notice. There is no evidence to contradict the appellant's evidence and the proving of relevant facts is precise and unambiguous, on the balance of probabilities. The appeal on ground (d) therefore succeeds in respect of Flat D.

Flat E

43. In respect of Flat E, the earliest rent receipt is the 19 December 2013 but there are also gaps in the payment of rent namely three months in 2014 and two months in 2017. However, there is clear evidence of arrears being paid before the last payment in December 2018.

44. The other documents submitted to demonstrate continuous use are:

- two Council tax bills dated the 17 February (for the period 1 April 2016 to 31 March 2017) and the 10 March 2017 (for the period 1 April 2017 to 31 March 2018) with regard to Flat 5, 46 Napier Road;
- a tenancy agreement dated the 9 June 2017; and
- a letter from the Council's Housing Benefit Department dated the 8 August 2017.

45. The Council tax bills are consistent with the information provided by the Council and the full tenancy agreement is signed and dated by the tenant and the appellant. Although the provenance of the Housing Benefit letter is not known, it explains the rent arrears and the back dated irregular payments and as it is addressed to the tenant whose name appears in the rent book, I give it some weight. The flat was occupied by one person and one child, as noted by the Council at their August 2015 site visit, and it is apparent that they were struggling to pay the rent, hence the application for housing benefit.

46. In terms of the oral evidence, there are no details from the appellant that support the continuous residential occupation of Flat E. Although Mr Chrzaszcz occupied his property from May 2013 and Mr Eze moved into his property after the relevant date, they only saw their neighbours as they passed through the alleyway or from their rear windows. They could not identify which flat they lived in or when they moved in. Mr Rana was able to confirm that in October 2013, Flat E was unoccupied. Mr Sillett, however, could not recall any details about the occupier of Flat E as when the November 2014 to March 2015 rent gap was brought to his attention, he mentioned the name of an individual and said 'maybe he moved out'.

47. Whilst there is no documentary evidence as to when Flat E was created, Mr Sillett's recollections about when the building work took place corroborate Mr Rana on his observation. With regard to continuous residential use, I note

an early rent book receipt¹ identifying Flat E by the name of the occupier. It would appear that this was the same occupier that the Council identified in August 2015, whose name is on the tenancy agreement in 2017 and is the person that the Housing Benefit letter is addressed to. In addition, whilst there are gaps in the payment of rent, it is apparent that most arrears are paid. The first payment of rent is recorded as the 19 December 2013 and the last record is the 7 December 2018. As such, the Goldex statements are not needed to demonstrate four years continuous use in respect of Flat E as this is already shown to have occurred in the main from the rent books.

48. Having regard to the totality of the evidence, it is concluded, on the balance of probabilities, that the use of Flat E as a self-contained residential unit took place more than four years before the issue of the notice. There is no evidence to contradict the appellant's evidence and the proving of relevant facts is precise and unambiguous on the balance of probabilities. The appeal on ground (d) therefore succeeds in respect of Flat E.

Flat F

49. In respect of Flat F, the earliest rent receipt is the 23 January 2014 and there are continuous monthly payments thereafter except for a gap between the January 2014 payment and the next payment on the 6 May 2014. In some months there are two payments and then no payments the month after, such as in August 2014 and January 2017.
50. The other documents submitted to demonstrate continuous use are:
- two council tax bills dated the 17 February (for the period 1 April 2016 to 31 March 2017) and the 10 March 2017 (for the period 1 April 2017 to 31 March 2018) with regard to Flat 6, 46 Napier Road;
 - a tenancy agreement dated the 19 June 2017; and
 - payment of rent statements from Goldex Sales and Lettings dated the 4 February, the 10 March and the 31 March 2018 in respect of 46 F Napier Road.
51. As I have found already, the Council tax bills are consistent with the information provided by the Council and the full tenancy agreement is signed and dated by the appellant and the tenant. I note that the Council are concerned that the documentary evidence is sparse. However, there is no requirement to submit copious evidence only that it should be sufficiently precise and unambiguous to demonstrate, on the balance of probabilities, what is claimed.
52. The rent book evidence, despite going missing for a time and receipts not strictly following in date order, presents a good account, once analysed, of generally consistent monthly payments over a period of four years. As such, the Goldex statements are not needed to demonstrate four years continuous use in respect of Flat F as this is already shown to have occurred in the main from the rent books.
53. The appellant refers to the recent *Islington*² case which confirms the position already established in *Thurrock*³ and *Swale*⁴. Applying *Islington* to the three

¹ 1 March 2014

² *Islington LBC v SSHCLG & Maxwell Estates* [2019] EWHC 2691 (Admin)

month gap in rent payments at Flat F, the test is whether the Council could have taken enforcement proceedings in respect of the breach. It is my view that they could have, even if the tenant had moved out, as all the fixtures and fittings remained to enable the residential use, which were seen by the Council at the August 2015 site visit.

54. In terms of the oral evidence, there are no details from the appellant that support the continuous residential occupation of Flat F. Although Mr Chrzaszcz was there from May 2013 and Mr Eze moved into his property after the relevant date, they only saw their neighbours as they passed through. They could not identify which flat they lived in or when they moved in. Mr Rana, however, was able to confirm that in October 2013, Flat F was occupied. Mr Sillett though, could not recall any details about the occupier of Flat F.
55. Having regard to the totality of the evidence, it is therefore concluded, on the balance of probabilities, that the use of Flat F as a self-contained residential unit took place more than four years before the issue of the notice. There is no evidence to contradict the appellant's evidence and the proving of relevant facts is precise and unambiguous, on the balance of probabilities. The appeal on ground (d) therefore succeeds in respect of Flat F.

Overall Conclusion

56. For the reasons given above I conclude that the appeal should succeed in part on ground (d) as it relates to Flats D, E and F, 46 Napier Road. The appeal on ground (d) does not succeed in relation to Flats A, B and C, 46 Napier Road. I shall therefore uphold the enforcement notice, with variations to reduce its scope, so that it only relates to Flats A, B and C.

Formal Decision

57. It is directed that the enforcement notice be varied: by the deletion of the requirements set out in paragraph 5(i) of the notice and the substitution of the words : 'Cease the residential use of the first floor of the building shown as Building G on the attached plan'; and by the substitution of the plan attached to this decision for the plan attached to the enforcement notice. Subject to these variations, the appeal is dismissed and the enforcement notice is upheld.

D Fleming

INSPECTOR

³ Thurrock BC v SSETR & Holding [2002] EWCA Civ 226

⁴ Swale BC v FSS & Lee [2005] EWCA Civ 1568

APPEARANCES

FOR THE APPELLANT:

K Olley Of Counsel	Instructed by Kingsley Smith Solicitors LLP
She called	
J Sangha	Appellant
J Eze	Appellant's tenant
C Adegbite-Enwereji	Appellant's tenant
G Sillett	Appellant's employee
L Chrzaszcz	Appellant's tenant
H Rana	Appellant's tenant
T Qamar	Appellant's tenant

FOR THE LOCAL PLANNING AUTHORITY:

M Henderson Of Counsel	Instructed by the Head of Legal Services
He called	
D Coleman BA MRTPI	Senior Planner

Documents:

- 1 Diagram to show where the Council's photographs had been taken from
- 2 Extract from Google Earth to show the site context
- 3 Three plans showing the layout of the first floor of the building before the works took place, and current ground and first floor layouts
- 4 Photocopy of the appellant's two rent account receipt books
- 5 Front page of tenancy agreement for Flat 46B Napier Road, containing the start date 9 May 2015
- 6 Incomplete copy of tenancy agreement for Flat 46B Napier Road containing the start date 17 June 2017
- 7 Copy of third rent account receipt book
- 8 Corrected enforcement notice plan showing Building G outlined in red
- 9 Photocopy of the appellant's three rent account receipt books with numbered pages
- 10 Copy of the Council's comments on the new evidence with photographs
- 11 Copy of the new evidence comprising a table for each flat showing when rent was paid 2013-2018 and other supporting documents for each flat



Plan

This is the plan referred to in my decision dated: 20 April 2020

by D Fleming BA (Hons) MRTPI

Land at: Building G, rear of 48-52 Napier Road, Gillingham, Kent ME7 4HD

Reference: APP/ A2280/C/18/3197399

Scale: Not to scale



