

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 22/06/2026 7:05 PM from [REDACTED]

Application Summary

Address:	Former St Josephs Convent Preparatory School 46 Old Road East Gravesend Kent DA12 1NR
Proposal:	Application for variation of condition 2 attached to planning permission reference number 20240013 for conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping; to allow amendments to the proposed size of the housing units to include 4 bedroom housing and additional 3 bed housing.
Case Officer:	Ms Rebecca Harrison

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Coombe Road Gravesend

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments:	I have lived on Coombe Road for 31 years, and I object to this application. I am not seeking to reopen the principle of the development, which was approved under 20240013 in November 2025. My objection is limited to what this application actually changes: the increased size and bedroom numbers of the houses, and the effect of that on parking and highway safety on Coombe Road and the surrounding streets. 1.) The houses are enlarged while the parking stays the same. The applicant's own schedules of accommodation show that, while the number of houses stays at 41, the houses themselves become larger. Bedrooms across the houses rise from 87 to 108, an increase of around 24%, and maximum occupancy rises from 168 to 195 people. Three-bedroom houses rise from five to eighteen, four new four-bedroom houses are added, and smaller two-bedroom units are removed. Yet parking is held at 46 spaces, the figure approved for the smaller scheme. Paragraph 112(b) of the National Planning Policy Framework (December 2024) requires parking standards to reflect the type, mix and use of development. Enlarging the houses without adding parking is not a neutral
-----------	---

change, and it warrants proper consideration.

2.) The scheme meets the standard only because the standard changed, not because demand has fallen.

The applicant relies on Kent County Council's adopted Parking Standards (2025), which require one space per three-bedroom house. The Gravesham standard they replaced required two, and both figures appear in the applicant's own table. The scheme now has 18 three-bedroom houses. Under the old standard these would have needed 36 spaces; under the new one they need only 18. So the change in standard alone halves the requirement for the three-bedroom houses, a drop of 18 spaces, and that is what allows the applicant to present 46 spaces as compliant against a requirement of 45, a margin of a single space across 41 family homes.

That figure on paper does not reflect any real fall in car ownership. Paragraph 112(d) of the NPPF requires parking standards to take account of local car ownership. In Gravesham, the share of households with two or more cars or vans rose by 3.9 percentage points between the 2011 and 2021 censuses (ONS Census 2021). Nationally, car ownership is at historically high levels and rises with household size and home ownership (DfT evidence), exactly the direction this amendment takes the scheme. A case for compliance that rests entirely on the reduced three-bedroom figure does not show the larger houses will park on their spaces.

3.) The shortfall will displace parking onto Coombe Road, an unacceptable highway safety impact the amended scheme has not assessed.

Three-bedroom terraces with a single space, and four-bedroom houses likely to run two or more cars, will need more parking than they are given, and the nearest spaces are on the surrounding streets. Coombe Road is already narrow and parked on both sides for most of the day if not all day, and the approved pedestrian link from Coombe Road into the site will encourage drivers, including patients visiting the medical centre, to park on Coombe Road and walk in. The result is obstruction, parking on corners and junctions, reduced visibility, and obstructed access for refuse vehicles and emergency services.

Paragraph 117(d) of the NPPF requires development to allow access for service and emergency vehicles, and paragraph 115(b) that there is safe and suitable access for all users; parking displaced onto Coombe Road puts both at risk. Paragraph 116 says development should be refused on highways grounds where there is an unacceptable impact on highway safety, a judgement that meeting a parking standard on paper does not settle. And under section 38(6) of the Planning and Compulsory Purchase Act 2004, the application must be determined in accordance with the development plan, including Core Strategy Policy CS11 (Transport) and the saved Local Plan policies T1 (Impact of Development on the Highway Network) and P3 (Vehicle Parking Standards).

I therefore ask that the on-site parking be increased to reflect the larger mix and local car ownership, and that Kent County Council Highways be consulted on the overspill. If enough additional parking is not provided, the application should be refused or granted only with a condition that prevents parking being displaced onto Coombe Road and other roads in the area.

Kind regards