

Delegated Report

Householder Planning Application

Planning Application No: 20250563

Location: 7 Old Road West Gravesend Kent DA11 0LH

Description: Formation of vehicular access and provision of one parking space in front garden.

Applicant: Mr Marco Manente

Site Visit Date: 17 June 2025

Submitted Documents/Plans

Householder Application for Planning Permission form;
Drawing no. 01 Site location plan;
Drawing no. 02 Existing block plan;
Drawing no. 03 Existing site plan, elevations and sections;
Drawing no. 04 Rev. A Proposed block plan;
Drawing no. 05 Rev. A Proposed site plan, elevations and sections;
Planning Statement 05 June 2025;
Email from the agent received 20 June 2025; and
Email from the agent received 22 August 2025.

Superseded Documents/Plans

Drawing no. 04 Proposed block plan; and
Drawing no. 05 Proposed site plan, elevations and sections.

Procedural Issues

Following the receipt of a consultation response from KCC Highways & Transportation and a request from the case officer, amended drawings of the proposed visibility splays were submitted and subject to additional consultation.

Relevant Planning History

Reference	Description	Decision	Decision Date
20110975	Formation of vehicular access on to a classified road and laying out of hardstanding in front garden.	Refused	19.12.2011
2012/00013 /REF	Appeal against the refusal APP/K2230/D/12/2172265	Dismissed	14.05.2012

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development

- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 9 – Promoting Sustainable Transport
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

Other Relevant Guidance

- Kent County Council Dropped Kerb Guidance and Self-Assessment (2025)
- Gravesham Driveway Dropped Kerb Guidance (Informal Guidance) (2023)
- Gravesham Front Driveway Design Guidance (Informal Guidance) (2023)
- Kent County Council's Parking Standards (January 2025)

Consultations, Publicity and Representations

GBC Environmental Protection Team (Regulatory Services)

There is no objection to this application or adverse comments to make.

KCC - Highways & Transportation

Initial response:

The vehicle crossover as shown on the proposed plans is not perpendicular to the carriageway. It is requested that this be amended with revised drawings provided as this change could alter the exact location of the crossover and impact upon pedestrian visibility splays.

Pedestrian visibility splays are stated to be shown on the proposed drawings as per section 6.34 of the Planning Statement, however these splays cannot be identified on either the "Proposed Block Plan" or the "Proposed Site Plan and Elevations/Sections". As such it is requested that the plans be updated to clearly demonstrate the required 2 metre by 2 metre pedestrian visibility splays on either side of the vehicle crossover, with no obstructions greater than 0.6 metres above carriageway level within the splays. There is

concern that the brick pillars proposed to be retained, which exceed 0.6 metres in height, may fall within the pedestrian visibility splays and cause obstruction. Further information on pedestrian visibility splays can be found in KCC's Kent Design Guide.

It is recommended that vehicle visibility splays are provided for the vehicle crossover. These should have a sight stopping distance based off of the speed limit of Old Road West and be drawn to the nearside kerb, as per the Department for Transport's Manual for Streets Guidance.

Should the Local Planning Authority wish to determine this application prior to the receipt of the above information, the following conditions are requested to be applied to any planning permission granted:

- Provision and permanent retention of 2 metre by 2 metre pedestrian visibility splays measured behind the footway on both sides of the access with no obstructions over 0.6 metres above footway level, prior to the use of the development commencing.
- Use of a bound surface for a minimum of the first 5 metres of the access from the edge of the highway.
- Provision and permanent retention of the vehicle parking space shown on the submitted plans prior to the use of the site commencing.
- Provision of measures to prevent the discharge of surface water onto the highway.

Informative

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

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

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

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

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

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

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

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

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

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

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

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

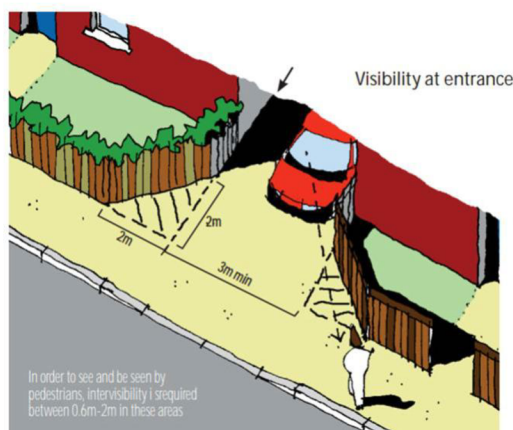
<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Second response:

Pedestrian Visibility Splays

The applicant has clarified via email (dated 20th June 2025) that the pedestrian visibility splays on the supplied drawings are shown using a "black outlined trapezoid" and this clarification is welcomed. However, the pedestrian visibility splays shown on the revised drawings (number 04 and 05, Revision A) have still not been shown correctly.

Pedestrian visibility splays measuring 2 metres by 2 metres, measured behind the footway either side of the vehicle crossover, with no obstructions exceeding 0.6 metres above carriageway level within the splays, must be demonstrated on a scaled plan. The applicant is required to provide updated drawings accordingly and a diagram from KCC's Kent Design Guide showing pedestrian visibility splays is included below for the applicant's reference.



Having reviewed the plans it is uncertain if the required pedestrian splays can be achieved within the red line boundary (RLB) of the site. Furthermore, the brick pillars proposed to be retained are highly likely to fall within these splays and cause an obstruction. Reduction of the brick pillars to a maximum height of 0.6 metres above carriageway level may be required if they are to be retained.

Vehicle Visibility Splays

Having reviewed the average speed data for Old Road West, and assessed the likely achievable vehicle visibility splays, it is considered that there are no anticipated visibility concerns for this site.

Other Matters

The applicant should be aware that it is KCC's preference for the crossover to be perpendicular to the carriageway and KCC's Vehicle Crossover/Streetworks teams may consider this when determining the request (separate to planning permission) for access.

Should the Local Planning Authority wish to determine this application prior to the receipt of the above information, the following conditions are requested to be applied to any planning permission granted:

- Provision and permanent retention of 2 metre by 2 metre pedestrian visibility splays measured behind the footway on both sides of the access with no obstructions over 0.6 metres above footway level, prior to the use of the development commencing.

- Use of a bound surface for a minimum of the first 5 metres of the access from the edge of the highway.
- Provision and permanent retention of the vehicle parking space shown on the submitted plans prior to the use of the development commencing.
- Provision of measures to prevent the discharge of water onto the highway.

The applicant should be aware that any planning permission granted by the Local Planning Authority does not constitute permission to undertake works to the highway. Separate consent from KCC Streetworks will be required for the vehicle crossover, with further information provided in the informative below.

NB the wording of the informative set out is the same as that in the initial response and as such, it has not been repeated here.

Third response:

The pedestrian visibility splays shown on the revised application drawing are sub-standard – Kent Design Guide specifies 2.0m x 2.0m on either side of a driveway emerging onto a footway for the ability of a driver to see a pedestrian walking along the footway as I am sure you are aware. It also recommends no obstructions over 600mm within those visibility splays so that children and pushchairs etc. may be seen. In this particular case the pillars on either side of the proposed access are in excess of 600mm high.

Whilst I accept that the 2.0m x 2.0m cannot be made available within the applicants land, I do still have concerns that the pillars on either side are an obstruction to visibility and therefore are a potential highway safety hazard to pedestrians using the busy footway alongside Old Road West. I would therefore recommend that provided a Condition is applied to any consent granted for the pillars on either side to be reduced to a maximum height of 600mm, then I would raise no objection on highway grounds.

Please note that, even if planning consent is granted, the applicant will still need consent from Kent Highways for the construction of the vehicle crossing. It is possible that the KCC Vehicle Crossing Team may not grant consent if the necessary standards are not met. The applicant should be made aware of this.

KCC Biodiversity Officer

Protected Species

The application is for the removal of an ornamental lawn, shrub and hedge to provide parking and there are limited opportunities for protected species presence, other than breeding birds that may be using the hedge and shrubs during breeding season. We do not require any ecological surveys.

If planning permission is approved, we recommend the following informative is used

Breeding Bird Informative

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

N.B.: It should be noted that some birds are capable of nesting outside of these times, especially where weather conditions are favourable. Birds such as feral pigeon, wood pigeon and barn owl have been recorded nesting in every month of the year. Care when removing bird nesting habitat may therefore be required at all times of year, with attention paid to the nesting habits of the species that could make use of the site and weather conditions at the time of clearance.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

We consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The front garden vegetation within the front of the dwelling, approximately 22m² will be lost for the placement of the block paved drive. This will include the loss of lawn, approximately a 4m length of ornamental hedgerow and other shrubs. This is too small an area to use within the BNG statutory metric tools to quantify the net loss for the LPA.

We highlight to the LPA that the planning statement has referred to small areas of garden loss and previous appeals.

The planning statement has stated soft landscaping will be placed at the south and east of the existing garden where we note there is already some existing planting present, shown within the photographs in the document, so benefits from new planting will be somewhat limited and we anticipate a minor loss will occur.

Gravesham Borough Council need to consider this application under Policy CS12: Green Infrastructure – Policy seeks to create, protect, enhance and maintain a multifunctional network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors within the Borough. As well as protecting the overall landscape character of the Borough and sites designated for their biodiversity value and ensuring no net loss of biodiversity in the Borough.

To reduce the loss, we consider that the block driveway could be replaced with a 'grasscrete' type system which would retain some vegetation and could be planted with low growing pollinator friendly species.

Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation.

The net gain assessment does not take into account which species are planted. So over and above what is considered for net gain more can be done to enhance biodiversity. We note this existing planting is of low value for wildlife due to the plant species present and we consider that any replacement planting is with plants that have a benefit to pollinators and a link to suitable plants is here

<https://www.rhs.org.uk/science/research/plants-for-pollinators>

We recommend a planting plan which improves the biodiversity value is provided as well as insect homes. A recommended condition wording is below.

Within three months of works commencing a plan detailing how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include a pollinator friendly planting plan and bee bricks/insect homes. The approved measures will be implemented and retained thereafter.

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications

(unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

Neighbouring properties

The application was publicised by a site notice and to six neighbouring properties by letter. No representations have been received.

Officer's Analysis

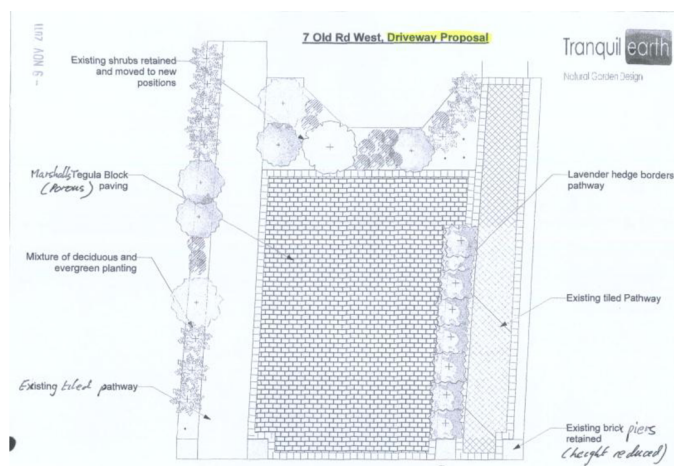
Background

Planning permission was refused and dismissed on appeal for the formation of a vehicular access and the laying out of a hardstanding in front garden at the application site (planning reference 20110975, appeal reference APP/K2230/D/12/2172265). The grounds of refusal were;

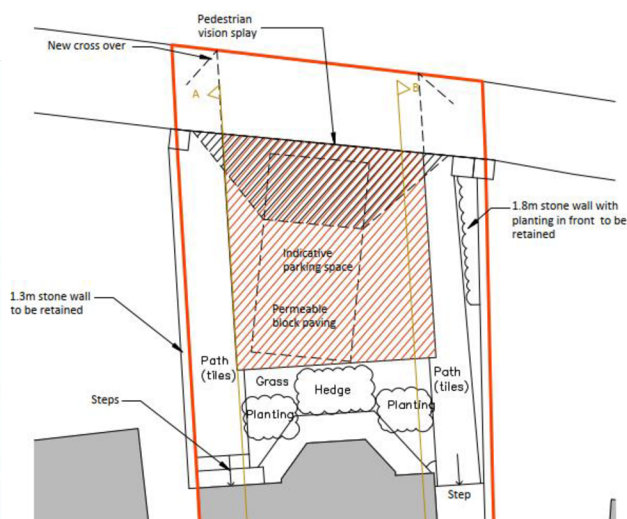
1. The proposed vehicle crossover would result in further hardening of the street scene and erosion of characteristic front gardens and boundaries in Old Road West. The proposal is therefore considered to have a detrimental impact on visual amenity and therefore contrary to policy TC1 of the Gravesham Local Plan 1994.
2. The proposal will not provide sufficient space for vehicles to enter or leave the site in a forward gear. This will have an adverse impact on highway safety and therefore will be contrary to policy T5 of the Gravesham Local Plan 1994.

The Inspector's decision is contained in Appendix 1 and sets out that "the proposal would involve the removal of the section of front boundary wall between the gate piers - which would be reduced in height to improve visibility - and the laying of hard surfacing over most of the front garden space allowing very limited scope for substantive planting close to the road. As a consequence of this, and having regard to the cumulative effect of further loss of elements that contribute to the character of the area, I conclude that the proposal would have an unacceptable effect on the character and appearance of the street scene." Furthermore, it states that "due to the inadequate size of the forecourt, the resulting need to reverse into or out of the site and the unsatisfactory levels of visibility available, the proposal would have an unacceptable effect on highway safety within this section of Old Road West."

As the following images illustrate, the refused proposal is very similar to the current one and therefore the Inspector's comments are very relevant to the consideration of this application;



20110975 refusal and dismissed on appeal



Current proposal

Design, Character and Appearance

Paragraph 135 of the National Planning Policy Framework 2024 (NPPF 2024) sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 139 of the NPPF 2024 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

In relation to frontage parking, relevant considerations in the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023 are that;

- Hardstanding should be proportionate to the size of the dwelling and the relevant car parking standards and avoid paving over a significant amount of the forecourt.
- Soft landscaped planted border along all boundaries should be provided in all spaces not specifically defined as parking or turning spaces.
- Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property.
- Must be designed to avoid cars overhanging the pavement. Minimum car parking space dimensions of 2.5 metres wide (or 2.7 metres where adjoining an enclosed boundary) and 5 metres deep.
- Should not include gates but if so, they should not open outwards, have sufficient space to open inwards whilst a car is parked and should not block visibility.
- Avoid removing any existing trees or established hedges and introduce new planting wherever possible.
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues.
- There should be no water run-off from the forecourt onto the public highway.
- Where loose surfacing is proposed, include a minimum of one metre depth non-loose hardstanding at the front edge of the driveway.
- Repair or restore any original decorative tiled paths.
- Pedestrian and vehicle visibility splays should be provided.

The application site comprises of a detached dwelling with a relatively large front garden that is laid to grass with vegetation including a hedge on the frontage and planting on the eastern side and in front of the dwelling. The front garden contains two, decorative tiled pathways and the boundary treatments are brick and flint walls (likely to be original) with piers of varying heights. As the following images illustrate, the frontage has a verdant and enclosed feel;



Photographs taken 17 June 2025

Old Road West benefits from a sense of openness, which can be attributed to its relative width and the set back of dwellings from the pavement. The front gardens of properties, in many cases, provide a soft visual

buffer between the footpaths and front elevations of the houses. The majority of surrounding dwellings have low walls as boundary treatments, with nos. 1 to 6, 8 and 10 Old Road West sharing a similar verdant, enclosed appearance to that of the application site. Whilst some vehicle accesses exist in the vicinity of the application site, these are predominantly narrow and retain some form of frontage boundary treatment. It is notable, in cases where the entire frontage has been opened up, that there is a distinct detriment to the character of the street scene. Overall, there is some uniformity to the immediate surrounding environment, whereby the front gardens are enclosed and often vegetated in nature. As the following images illustrate, this is a positive feature of the street scene, which contributes to visual amenity on this important thoroughfare through Gravesend.



View to the east of the application site



View to the west of the application site

The proposed development would provide a hard surfaced parking area resulting in the complete removal of the front boundary wall, its two pillars, the hedge on frontage, the grassed area and central shrub. The planting on eastern side and in front of the dwelling would be retained but no additional planting would be undertaken. Permeable block paving is proposed but no specific details have been provided (although these could be submitted via a planning condition).

It is noted that dimensions for the proposed hard standing given in the submitted Planning Statement are inconsistent with the submitted drawings. The Statement refers to it being 6 metres (depth) by 7.5 metres (width) but the drawings illustrate 5.1 metres (width at front boundary), 5 metres (width at rear) and 6 metres (depth on the western side) and 5.2 metres (depth on the eastern side). It is also noted that, at paragraphs 6.43 and 6.44, the submitted Planning Statement refers to additional/the enhancement of soft landscaping but these are misleading statements because no additional planting is proposed, only the existing planting would be retained.

According to the Householder Extensions/Alterations Design Guide (2021) a single parking space should have minimum dimensions of 2.5 metres width (or 2.7 metres adjoining an enclosed boundary) by 5 metres depth. As such, the dimensions of the proposed parking area would be significantly greater than that required and would result in the loss of a much greater area of planted garden than is necessary. This is a negative design feature and is contrary to the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023.

The proposed development would retain existing decorative tiled paths in the front garden which is welcomed but there would be no repair or restoration of these features. For example, the path on the

western side of the front garden has missing tiles near the frontage. This is a negative design feature and is contrary to the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023.

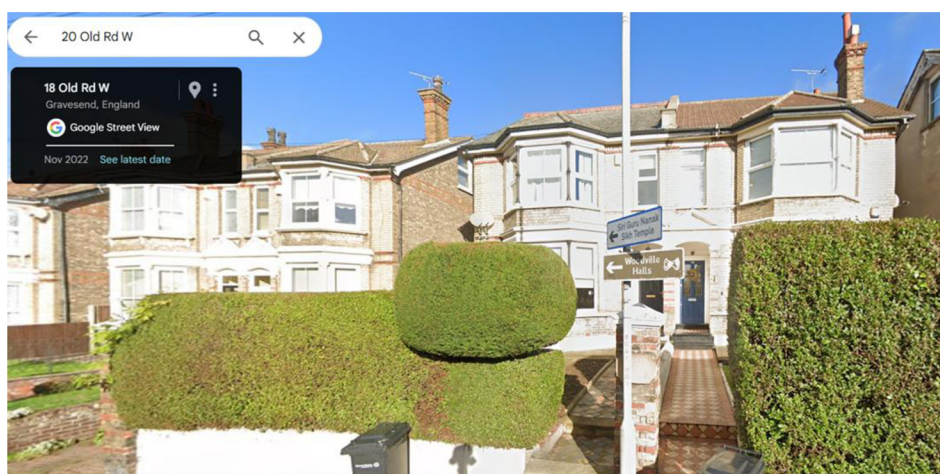
It is acknowledged that the proposal would not result in cars overhanging the pavement, would provide access to the front door/side of the property, not include gates and avoid adverse surface water run off issues, all of which align with the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023. Furthermore, three brick piers and some of the existing vegetation would be retained, which are positive design features.

However, the proposed development would result in the loss of much of the vegetated and all of the enclosed nature of the front garden at the application site and its replacement with an expanse of hardstanding and a parked vehicle(s), which would be detrimental to the character and appearance of the street scene. Despite the positive design features of the proposal, the proposed opening on the site frontage would be excessive in width and undermine the existing sense of enclosure. Furthermore, the retained planting at the rear, would not be widely visible in the street scene and the introduction of an open hard standing and parked vehicles on the site frontage, would undermine the existing verdant nature of the front garden.

It is acknowledged that a number of existing vehicle accesses and frontage parking areas already exist in this section of Old Road West. Some of these do not have planning permission and presumably they were permitted development or have become lawful through the passage of time. Some have been granted permission on appeal and some have been approved. However, it is considered that the fact that there are existing accesses would not necessarily justify granting a planning permission that would cause adverse visual impacts in itself. Every planning application must be determined on its own merits and in order to be relevant in this instance, the existing access must be directly comparable to the current proposal.

As the following example illustrates, the existence of other frontage parking provision in Old Road West would not justify the proposed development. Rather it highlights the negative impacts of the erosion of the original character of this important street.

A recent hardstanding at no. 20 Old Road West (20240358), was allowed at appeal (appeal reference APP/K2230/D/24/3349193 Appendix 2). From the below images it is evident that this frontage has resulted in urbanisation of the street form and detracts from the character of the street scene.



Original frontage 20 Old Road West (Google Street View November 2022)



Approved driveway



Google Earth image

At paragraph 5 of the appeal decision, the inspector states that the “Loss of the previous brick wall, hedge and lawn are **regrettable**” but their reasoning for permitting in design terms was related to the fact that there are other types of similar development nearby. It is evident from seeing the finished development at 20 Old Road West that such frontages have a significant impact on the street scene by way of introducing a vast expanse of unbroken and hard materials that will remain in place for the foreseeable future. The choice of materials do not complement the traditional yellow brick finish of the main and surrounding dwellings which are characteristic of Old Road West. However, the previous green frontage maintained the existing character alongside the original tiled path which led to the front door, this was a strong feature of Old Road West and its loss has damaged the visual amenity. The current drive also introduces a tokenistic level of soft landscaping which is a far cry from the vast green hedges that previously adorned the frontage.

There are a number of appeals which uphold the Council’s concern relating to a loss of frontages and subsequent impacts on the character of the area. The isolated decision in which an inspector has allowed an appeal also notes that the loss of frontage is “regrettable” which implies that this loss is not a positive alteration, this permission has now resulted in a wave of new applications for similar development which if permitted would have a cumulative impact on the area that will be detrimental to the character and visual amenity of the street scene.

Overall, it is considered that the proposed development would undermine the verdant and enclosed nature, of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the NPPF 2024, to the Householder Extensions/Alterations Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

Amenity of Future Occupiers

The proposed development would not impact upon the private amenity space or internal layout of the application property and would not adversely impact on the privacy, daylight or sunlight of its occupants. As such, the proposal would not be detrimental to the amenity of future occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

Due to the design of the proposed development and to the layout and orientation of the surrounding properties, there would be no adverse overlooking, overshadowing, overbearing impacts to the occupiers of the surrounding dwellings. As such, the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core

Strategy (September 2014).

Parking and Highways

Paragraph 115(b) of the NPPF 2024 requires new development to ensure that safe and suitable access can be achieved for all users and paragraph 116 sets out that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety.

Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994) require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

Saved Policy T5 of the Gravesham Local Plan First Review (1994) requires new accesses to be in an acceptable location and to an acceptable standard and to not give rise to danger.

According to the Borough Council's adopted Vehicle Parking Standards, a four or more bedroom dwelling should have three vehicle parking spaces and according to the Householder Extensions/Alterations Design Guide (2021), car parking spaces should be a minimum of 2.5 metres wide (or 2.7 metres where adjoining an enclosed boundary) and 5 metres deep. The KCC Residential Dropped Kerb Guidance and Self-Assessment 2025 sets out that a driveway should incorporate 2 metres x 2 metres pedestrian visibility splays on either side, where there can be no obstruction in excess of 0.6 metres height (pedestrian visibility) and incorporate appropriate sightlines according to the speed limit of the road (carriageway visibility). For a 30 mile per hour road, the carriageway visibility should be measured from a point 2.4 metres from the back of the carriageway for a length of 43 metres.

KCC Highways & Transportation have provided three comments regarding the proposed development. These are summarised in the Consultation section above and the main issues are as follows;

- The pedestrian visibility splays shown in the application details are substandard and have not been shown correctly.
- 2 metre by 2 metre pedestrian visibility splays cannot be made available within the applicant's land.
- No highway objection provided that the pillars located on either side of the proposed access are reduced to a maximum height of 0.6 metres.
- There are no anticipated vehicle visibility concerns.
- The applicant should be made aware that he will need consent from Kent Highways for the construction of the vehicle crossing. It is possible that the KCC Vehicle Crossing Team may not grant consent if the necessary visibility standards are not met and if the proposed crossover is not perpendicular to the carriageway.
- If planning permission is granted then the following conditions are requested:
 1. Use of a bound surface for a minimum of the first 5 metres of the access from the edge of the highway.
 2. Provision and permanent retention of the vehicle parking space shown on the submitted plans prior to the use of the development commencing.
 3. Provision of measures to prevent the discharge of water onto the highway.

The application property has four bedrooms and no on-site parking at present. The proposed development would result in the provision of a frontage parking area with dimensions 5.1 metres (width at front boundary), 5 metres (width at rear) and 6 metres (depth on the western side) and 5.2 metres (depth on the eastern side). Therefore, the proposed parking area would exceed the minimum standard size for one parking space and could actually accommodate two vehicles. Although it is noted that the proposal shows an indicative parking space with dimensions of 2.5 metres width by 5 metres depth.

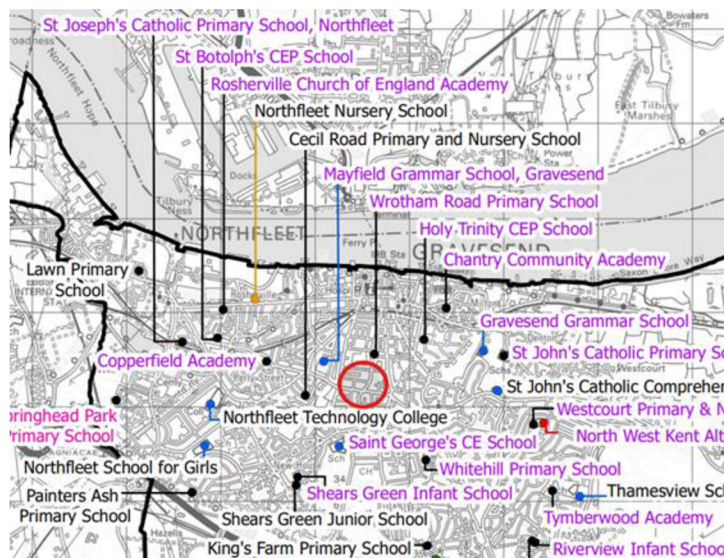
Whether one or two parking spaces are provided, the proposed development would still not provide the three parking spaces required under the adopted standards. Although it is noted that KCC Highways & Transportation have provided more recent guidance (as yet unadopted) that requires a minimum of two spaces to be provided for a four or more bedroom property in a suburban location (Kent County Council's Parking Standards January 2025). It is also noted that the application site is located in a relatively

sustainable location, close to local shops and services and a bus route.

Overall, it is considered that in principle, the provision of some frontage parking would be beneficial in highways terms but that the proposed development should be designed so as to ensure safe access both onto and off from those spaces. This approach is in line with the NPPF 2024, Saved Policy T5 of the Gravesham Local Plan First Review (1994) and the Kent County Council Dropped Kerb Guidance and Self-Assessment (2025). Part of this design approach requires appropriate visibility to be provided and also seeks to ensure that safe parking manoeuvres can be undertaken.

KCC Highways & Transportation have set out that sufficient vehicle visibility exists but have raised concerns regarding pedestrian visibility.

It should be noted that Old Road West is a very busy road with significant volumes of vehicle and pedestrian traffic, throughout the day and especially at peak times. Due to the proximity of a number of schools (as illustrated below), the pedestrian traffic includes a high number of children.



The proposed development would retain three brick pillars on the site frontage. Two, located on either side of the driveway, are 1.4 metres tall and on eastern side, a further brick pillar of 2.2 metres height (that is only partially within the ownership of the applicant) would be retained. Furthermore, both side boundary walls would be retained. The western wall is 1.8 metres tall and the eastern wall is 1.3 metres in height.

The distance from the edge of the proposed parking area to the side boundary of the application site is only 1.2 metres on the western side and 1.6 metres on the eastern side. The pillars and walls referred to above would be located within these areas and within a two metre distance set back into the site. Therefore, insufficient sized pedestrian visibility splays would be provided and these splays would include obstructions over 0.6 metres in height within them. This design approach would therefore be detrimental to pedestrian visibility and undermine highway safety by virtue of increasing the potential for hazardous manoeuvres, which would cause dangers to passing pedestrians.

It is noted that the other issues raised by KCC Highways & Transportation can be the subject of planning conditions/informatives attached to any planning permission granted.

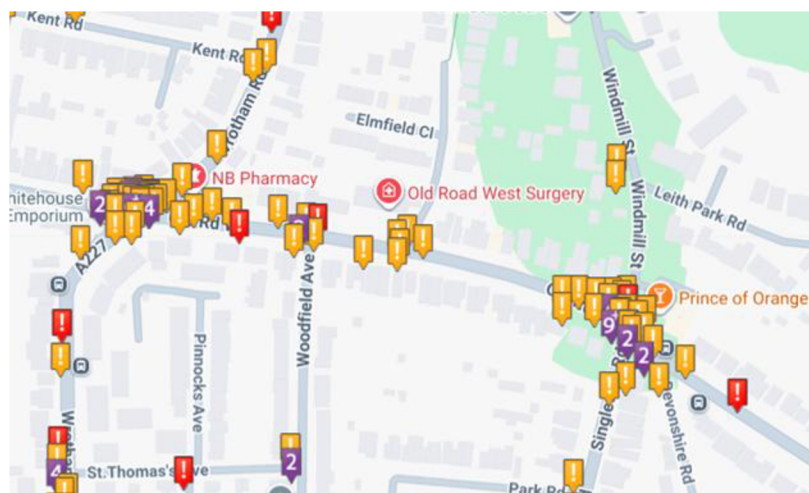
Whilst it is acknowledged that KCC Highways & Transportation have offered a potential solution to the pedestrian visibility issue (one which the applicant has indicated would be acceptable to him), an ownership issue and the adverse visual impacts of removing large areas of side boundary walls and brick piers would mean that this would not be an achievable or welcome approach. Furthermore, due to the, in principle, highway safety issues raised in the following paragraphs, the applicant has not been asked to amend the proposal.

The application site is located on a classified road (B Class) which is a district distributor route and as such,

it is very busy. It has a 30 mile per hour speed limit and there are single yellow line parking restrictions outside majority of the application site and from its eastern edge, there is a double yellow line. According to a sign opposite the application site (outside no. 10 Old Road West) on street parking is allowed (in the single yellow line areas) on Mondays to Saturdays between 18.30 and 08.00 and on Sundays. The application site is located some 42 metres to the west of a signal controlled crossroads (of Old Road West/Old Road East/Singlewell Road/Windmill Street) and at busy times, vehicles queue outside the site before passing through the traffic lights.

The proposed access/parking area would not provide sufficient space to allow a vehicle to turn around within the application site. Therefore, vehicles would either reverse onto the driveway or reverse off it. As a result of the highway characteristics described above, both reversing onto and off from the proposed parking area are likely to be hazardous manoeuvres, which would impede traffic flows and cause dangers to passing pedestrians and vehicles.

With regards to accidents in the vicinity of the application site, the crash data map below shows a significant volume of road traffic collisions on this classified highway, in close proximity to the property. This data raises concerns in relation to existing highway safety, and the addition of an unsafe access, which could result in further accidents, to the detriment of highway safety.



Source: CrashMap

The local news article contained in Appendix 3 highlights that accidents on this section of Old Road West are not isolated incidents and are still occurring in more recent times.

It is acknowledged that KCC Highways & Transportation, as the local highway authority, have not objected to the principle of an access at the application site. However, it must be highlighted that there is no Kent policy requirement for a vehicle to be able to turn within a site. In this instance, the Borough Council considers that a lack of turning area in such a busy and constrained location, would be detrimental to highway safety. Indeed, this approach has been supported by a recent Inspector's decision at no. 241 Wrotham Road (APP/K2230/D/25/3360751 Appendix 4) and the Inspector's decision at the application site regarding application reference 20110975 (Appendix 1). The situation at no. 241 Wrotham Road (located on a busy road, close to a junction) is very similar to that at the application site.

In relation to the lack of objection by KCC Highways and Transportation, the Inspector at no. 170 Wrotham Road (APP/K2230/D/19/3236225 Appendix 5) stated;

6. Through the assessment of the original application, I note that Kent Highways, as the local highway authority, raised no objection to the proposal. However, in contrast, this position was not shared by the Council's Highway Development Management Officer. Based on the evidence before me, although the guidance referred to is somewhat dated, the advice provided by the Council's in-house expert has more substance to it. Moreover, for the reasons identified above, I entirely agree with the advice provided. As a consequence, I attach limited weight to the advice provided by Kent Highways.

In this instance, it is considered that a similar approach can be taken and for the reasons set out above, the weight attached to the KCC Highways & Transportation lack of objection is limited.

As part of the determination of this application, the surrounding context is a relevant consideration, but the relevance of existing accesses diminishes, where they do not exhibit the same characteristics as the application site.

The applicant has identified three recent appeal decisions which he considers relevant to the determination of this application. These are summarised and commented below.

20240534 37 Old Road West, Gravesend (Appendix 1 of the submitted Planning Statement) and 20240358 20 Old Road West, Gravesend (Appendix 2 of the submitted Planning Statement) - The appeal decisions in both cases are very similarly worded and made by the same Inspector. The proposed development at both sites was for a vehicle access and parking space in the front garden of the property and both were refused due to inadequate visibility and the lack of a turning area being provided on site. No. 37 is located some 177 metres to the west of the signal controlled crossroads at Old Road West/Old Road East/Singlewell Road/Windmill Street and no. 20 is located some 84 metres to the west of the same junction. In allowing the appeals, the Inspector referred to the proposals being a similar arrangement to other properties and that vehicle manoeuvres across footpaths into and out of accesses are a common feature along Old Road West. Whilst these comments are not disputed, it is highlighted that they are only relevant to the specific context of those particular sites. For the area surrounding the current application site, existing accesses are much less numerous. Furthermore, the close proximity of the application site to the signal controlled junction is a significant differentiating factor from nos. 20 and 37 Old Road West.

The Borough Council would raise serious concerns regarding the Inspector's statements at paragraphs 8 and 9 of no. 37 and paragraphs 5 and 6 of no. 20. It is considered that the fact that existing accesses are dangerous should not be a reason to accept a new proposal that would exacerbate adverse highway safety impacts. This would set an alarming precedent. Again, it is highlighted that these conclusions are site specific and for the current application site, due to the greater propensity for queuing traffic and the proximity to the junction, it cannot realistically be argued that access and egress manoeuvres would be of a short duration.

As such, it is considered that the appeal decisions at nos. 20 and 37 Old Road West are not directly comparable to the situation at the application site and would not justify planning permission being granted for the current proposal. Overall, the decisions have limited weight in the determination of this application.

Warner House, Cotton Lane, Stone, Dartford (Appendix 3 of the submitted Planning Statement) - The appeal proposal and site differ considerably from the current application site, in that the road (Cotton Road, Stone) is a 'C' classification, the access already existed and the development was for a new dwelling. In addition to this, the site plan shows a turning area to ensure cars can leave in a forward gear, which is not the case for the current proposal. As such, this appeal decision is not directly comparable to the situation at the application site and the decision has limited weight in the determination of this application.

However, it is highlighted that at paragraph 17, the Inspector notes that having a turning area reduces the potential for less safe reversing manoeuvres. A point that is relevant to the application site and corroborates the adverse highway safety concerns raised above.

Furthermore, the applicant refers to the Inspector's statement in paragraph 12, regarding Manual for Streets 1 and 2 as not being relevant to an access serving a few dwellings. However, as set out above, the KCC Residential Dropped Kerb Guidance and Self-Assessment 2025 sets out that a driveway should incorporate appropriate sightlines according to the speed limit of the road (carriageway visibility) and that for a 30 mile per hour road, the carriageway visibility should be measured from a point 2.4 metres from the back of the carriageway for a length of 43 metres. Therefore, the requirement for adequate vehicle visibility, is not taken from Manual for Streets, it is taken from a 2025 KCC highway document. Notwithstanding this, for the application site, KCC Highways & Transportation have not raised concerns regarding vehicle visibility.

Overall and taking all of the above issues into account, it is considered that the highways benefits of the proposal (that it would allow some off street parking, with appropriate dimensions and provide sufficient vehicle visibility) would not overcome the negative impacts (insufficient pedestrian visibility and a lack of turning provision, which would increase in the potential for traffic conflict and hazardous manoeuvres, which would impede traffic flows and cause dangers to passing pedestrians and vehicles). As such, the proposal would be detrimental to highway safety and be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014), to Saved Policies T1 and T5 of the Gravesham Local Plan First Review November 1994, to paragraph 115(b) of the NPPF 2024, to the Householder Extensions/Alterations Design Guide (2021), to the Gravesham Driveway Dropped Kerb Guidance (2023) and to the Kent County Council Dropped Kerb Guidance and Self-Assessment (2025).

Ecology and Biodiversity

Biodiversity Net Gain (BNG) is a mandatory requirement for all new development and proposals must deliver a BNG of at least 10% unless they are exempt. In this instance, the proposed development is a householder proposal and therefore is exempt from BNG.

Notwithstanding the BNG exemption, biodiversity is an important consideration in all new development. Policy CS12 of the Gravesham Local Plan Core Strategy (2014) states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within Biodiversity Opportunity Areas and within new development.

The proposal would result in the removal of an existing hedge on frontage, a grassed area and a mature shrub. The planting on eastern side and in front of the dwelling would be retained. KCC Biodiversity have highlighted that there would be a loss of biodiversity and that the proposal could be improved by the incorporation of a 'grasscrete' type surface, the undertaking of pollinator friendly planting and the provision of bee/insect homes. It is noted that the applicant has indicated that incorporating planting and the provision of bee/insect homes would be acceptable to him. However, due to the, in principle, highway safety and design issues raised above, the applicant has not been asked to amend the proposal.

Overall, subject to the imposition of a suitably worded planning condition, there would be no adverse biodiversity impacts and the proposal would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Any Other Material Planning Considerations

The application site is located within the buffer zone for the Woodfield Avenue historic landfill site and as such, any groundworks may be subject to contamination. However, provided that a contamination watching brief planning condition is attached to any planning permission granted, then there would be no adverse ground contamination impacts.

The application site is located within an area of multi-period archaeological potential, Groundwater Source Protection Zone 1 and a Site of Special Scientific Interest (SSSI) Impact Risk Zone. However, as the proposed development would be within the confines of an existing residential garden and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to archaeology, groundwater or any sensitive habitats.

Conclusion

The proposed development would have no adverse residential amenity, biodiversity, surface water run off, contamination, groundwater or sensitive habitats impacts. However, the proposal would be out of character with the application property and its surroundings and would be detrimental to visual amenity and highway safety.

Overall, it is considered that the adverse impacts of the proposed development attract significant weight and would significantly and demonstrably outweigh the benefits of the proposal. Therefore, following a thorough assessment of the application and all material planning considerations, it is considered that the proposed development cannot be supported.

Recommendation

That planning permission should be refused on the following grounds;

1. By virtue of a lack of an on-site turning area and inadequate pedestrian visibility splays, the proposed development would make insufficient provision for safe ingress and egress to and from the application site, leading to drivers presenting dangers to passing vehicles and pedestrians and impeding the free flow of traffic on Old Road West. As such, the proposed development would be detrimental to highway safety and be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (2014), to Saved Policies T1 and T5 of the Gravesham Local Plan First Review (1994), to paragraph 115(b) of the National Planning Policy Framework 2024, to the Householder Extensions/Alterations Design Guide (2021), to the GBC Front Driveway Guidance 2023 and to the Gravesham Driveway Dropped Kerb Guidance (2023).
2. The proposed development would undermine the verdant and enclosed nature of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the National Planning Policy Framework 2024, to the Householder Extensions/Alterations Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	11 September 2025	Dated:	12 th September 2025