

Planning Statement

Proposed Demolition of Existing Garage, Erection of a Two-Storey Side Extension and Conversion of Dwelling (Use Class C3) into a 9-Bedroom House in Multiple Occupation (Sui Generis)

**40 Cross Lane East,
Gravesend,
Kent
DA12 5HB**

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1. Introduction

This Planning Statement has been prepared by **Dream Design Develop Ltd** in support of a full planning application for the **demolition of the existing garage, erection of a two-storey side extension, and conversion of the existing dwelling (Use Class C3) at 40 Cross Lane East, Gravesend, Kent DA12 5HB**, to form a **9-bedroom House in Multiple Occupation (HMO)** falling within **Sui Generis** use class.

The purpose of this statement is to provide a comprehensive and robust planning justification for the proposed development. It demonstrates that the scheme accords with the relevant provisions of national and local planning policy and represents a sustainable, well-designed, and policy-compliant form of residential intensification within an established urban location.

The application site comprises an **end-of-terrace two-storey dwelling** situated on the southern side of **Cross Lane East**, within a well-established residential area of Gravesend characterised by a mix of terraced and semi-detached family houses. The surrounding area has evolved incrementally, displaying a variety of building styles and modest extensions that contribute to a coherent yet diverse suburban character.

The property benefits from a **front driveway** providing off-street parking and refuse collection access, an existing **single-storey side garage** (to be demolished), and a **generous rear garden** which will continue to provide private amenity space for future residents. The site enjoys a sustainable and accessible position, being within easy reach of **local shops, services, and public transport facilities**, including **bus stops** on Cross Lane East and **Gravesend Railway Station**, which offers direct connections to London and the wider region.

The proposed development seeks to deliver **high-quality, professionally managed shared accommodation for up to sixteen residents** within a 9-bedroom House in Multiple Occupation (HMO). The scheme provides a carefully balanced mix of **ensuite and shared facilities**, including **four bedrooms with private kitchenettes**, allowing for semi-independent living while reducing peak demand on communal spaces. Residents will benefit from a **spacious, fully equipped shared kitchen, living and dining area**, as well as **direct access to generous private outdoor amenity space** to the rear of the property. The internal layout has been designed to ensure excellent levels of comfort, privacy, and convenience, promoting both social interaction and personal independence. All proposed bedrooms meet or exceed Gravesend Borough Council's HMO Licensing Standards and align with the Nationally Described Space Standards (NDSS) as a benchmark for internal space and quality, ensuring that the development achieves a high standard of living accommodation consistent with local and national policy objectives.

Architecturally, the proposal has been designed to integrate seamlessly with the host property and the wider terrace. The **two-storey side extension** is proportionate in scale and set back from the principal elevation to ensure subordination to the main dwelling. The extension will utilise matching external materials, including brickwork and roof tiles, to maintain visual harmony within the terrace and preserve the established rhythm of the street.

This Planning Statement has been prepared with due regard to the **National Planning Policy Framework (NPPF, December 2024)**, the **Gravesham Local Plan Core Strategy (2014)**, and all other material planning considerations. The document assesses the proposal in the context of relevant local planning policies, including those relating to **sustainable development (Policy CS02)**, **housing mix and choice (Policy CS09)**, **transport and accessibility (Policy CS11)**, and **design quality and character (Policy CS19)**.

The proposal is consistent with the overarching objectives of the **NPPF**, which seek to make efficient use of existing land and buildings, deliver a range of homes to meet local needs, and promote sustainable, well-designed development that enhances the character of established urban areas.

In summary, this Planning Statement demonstrates that the proposed development represents a **sustainable, well-considered, and policy-compliant enhancement** of an existing end-of-terrace dwelling. The scheme makes effective use of existing housing stock to provide much-needed shared accommodation, contributes positively to the borough's housing mix, and will not give rise to adverse impacts on the amenity of neighbouring occupiers or the character of the local area.

Accordingly, it is respectfully submitted that the proposal constitutes a **sustainable and appropriate form of residential development**, and that **planning permission should be granted**.

2. Site and Planning History

The application site is located at **40 Cross Lane East, Gravesend, Kent DA12 5HB**, occupying an **end-of-terrace position** on the southern side of Cross Lane East within an established residential area to the east of Gravesend town centre. The surrounding neighbourhood is suburban in character and predominantly residential in use.

2.1 Site Context

The surrounding area consists primarily of **terraced and semi-detached dwellings**, many of which have been extended and improved over time. Properties along Cross Lane East are typically two-storey in height and constructed of brick or render under pitched tiled roofs, contributing to a varied yet coherent suburban character.

The application property is a **two-storey end-of-terrace dwelling** with a **front driveway** providing off-street parking and an existing **single-storey side garage**, proposed for demolition as part of this application. To the rear, the dwelling benefits from a **large private garden**, enclosed by boundary fencing and hedging, which offers a good level of outdoor amenity and will be retained for future occupants.

The immediate area includes several examples of **two-storey side extensions** and **roof conversions**, establishing a clear and consistent pattern of residential adaptation and intensification. The proposed extension will therefore integrate comfortably with the prevailing form of development and will not appear out of character within the street scene.

2.2 Local Facilities and Accessibility

The site benefits from an **excellent level of accessibility** to local services, community facilities and public transport.

- A range of **local shops, schools and community services** are located nearby along Valley Drive and within **Gravesend town centre**, which lies approximately **three-quarters of a mile to the west**.
- **Bus stops** are located along Cross Lane East and Valley Drive, providing regular services to Gravesend, Northfleet and Medway.
- **Gravesend railway station**, situated approximately **one mile away**, offers both high-speed and mainline services to **London St Pancras, Charing Cross**, and **Dartford**, ensuring convenient commuter access.

The area is well served by pavements and local cycle routes, providing safe and direct connections to nearby amenities and public transport services. The proposal includes **secure and covered** cycle storage for sixteen bicycles (one per resident), **aligning with the aims of Policy CS11 to promote active travel** of the *Gravesham Local Plan Core Strategy (2014)*. This provision supports the Council's wider objectives of encouraging active travel, reducing car dependency, and enhancing accessibility within urban areas.

Given its proximity to public transport and local amenities, the site represents a **highly sustainable location** where modest residential intensification is entirely appropriate in planning terms.

2.3 Planning History

The property has an established planning history relevant to the current proposal, as shown below:

Reference	19860841
Application Received	24 October 1986
Address	40 Cross Lane East, Gravesend, Kent, DA12 5HB

Proposal	Erection of a two-storey side extension to form a garage workshop with bedroom over
Status	Application Permitted
Decision	Permitted

This historic approval confirms the Local Planning Authority's acceptance of the **principle and scale of a two-storey side extension** at this site. The current proposal builds upon that precedent, seeking permission for a similarly proportioned extension that will facilitate the conversion of the property into a high-quality, purpose-built HMO.

2.4 Planning Designations and Constraints

The site is **not located within a conservation area**, and the property is **not listed**. There are **no Tree Preservation Orders (TPOs)** affecting the site or surrounding land.

According to Environment Agency mapping, the property lies within **Flood Zone 1**, indicating a **low probability of flooding**. There are no known ecological, heritage or environmental constraints that would preclude development. The proposal has been designed to respect the site's suburban context and optimise its residential potential.

2.5 Summary

In summary, **40 Cross Lane East** occupies an **end-of-terrace plot** within a well-established residential setting that has evolved through modest extensions and conversions over time. The site benefits from **good access to public transport, local services, and community facilities**, and is unconstrained by environmental or heritage designations.

The previously approved application (Ref: **19860841**) provides a clear **planning precedent** for a two-storey side extension of similar form and scale, reinforcing the acceptability of the proposed development.

Accordingly, the site represents a **suitable and sustainable location for modest residential intensification**, consistent with **Paragraph 11** of the **National Planning Policy Framework (2024)** and **Policy CS02 (Scale and Distribution of Development)** of the **Gravesham Local Plan Core Strategy (2014)**.

3. Proposed Development

This application seeks full planning permission for the **demolition of the existing single-storey garage**, the **erection of a two-storey side extension**, and the **conversion of the existing end-of-terrace dwelling (Use Class C3)** into a **9-bedroom House in Multiple Occupation (HMO)** falling within **Sui Generis use class**.

The proposal represents a **sustainable and well-considered form of residential intensification** that makes efficient use of existing housing stock, responding to the growing

demand for **high-quality, well-managed shared accommodation** within Gravesend. The development will provide **modern, comfortable living accommodation for up to sixteen residents**, incorporating a mix of ensuite rooms and **four units with private kitchenettes** to enhance resident choice and reduce pressure on shared facilities. The scheme meets or exceeds all relevant **space, design, and amenity standards**, ensuring a high level of residential quality while maintaining the **established character and residential appearance** of Cross Lane East.

3.1 Design Rationale and Development Approach

The design of the scheme has been informed by a detailed appraisal of the site's context, built form, and surrounding character. The proposal seeks to create a **sympathetic and proportionate extension** to the existing end-of-terrace dwelling, ensuring that the property continues to read as a **cohesive residential unit** within the street scene.

The demolition of the existing side garage allows for a more efficient use of the site, accommodating a **two-storey side extension** that mirrors the proportions and detailing of the host dwelling. The proposed extension has been designed to:

- Maintain the existing ridge height and roof pitch for visual consistency;
- Be set back from the principal elevation, ensuring subordination to the main dwelling;
- Use matching materials including brickwork, roof tiles, and fenestration detailing; and
- Retain the domestic character of the property and terrace, ensuring the development blends seamlessly with the street scene.

Externally, the proposed alterations are modest and fully in keeping with the prevailing pattern of development. The scale and massing of the extension reflect neighbouring extensions along Cross Lane East, thereby preserving the **visual balance and rhythm** of the terrace.

3.2 Internal Layout and Accommodation Standards

The internal layout has been designed to deliver a **high-quality, comfortable, and well-balanced living environment** that fully meets Gravesend Borough Council's HMO Licensing Standards and aligns with the Nationally Described Space Standards (NDSS) as a benchmark for internal space and quality.

The 9-bedroom HMO will accommodate **up to sixteen residents**, with a carefully considered mix of **ensuite and shared facilities** that promote both privacy and social interaction. Four bedrooms (Rooms 1, 3, 5 and 9) are equipped with **private kitchenettes** featuring electric hobs and extraction, allowing for semi-independent living and reducing peak demand on the communal kitchen. Each bedroom benefits from excellent levels of **natural light, ventilation, and circulation space**, while the shared kitchen, dining, and living areas provide

generous and well-proportioned communal facilities that exceed the relevant HMO standards for this level of occupancy.

HMO Space Standards Compliance Table

Room No.	Description	Proposed Bedroom Size (sqm)	Proposed Ensuite / Bathroom (sqm)	Kitchenette	Proposed Occupancy	Minimum Standard (Bedroom only, sqm)	Complies
1 (GF)	Bedroom with ensuite	14.5	4.2	Yes	2 persons	10.0 (double ensuite)	✓ Exceeds
2 (GF)	Bedroom with ensuite	11.5	3.0	No	2 persons	10.0 (double ensuite)	✓ Exceeds
3 (GF)	Bedroom with ensuite	14.5	3.2	Yes	2 persons	10.0 (double ensuite)	✓ Exceeds
4 (FF)	Bedroom with ensuite	12.0	2.5	No	2 persons	10.0 (double ensuite)	✓ Exceeds
5 (FF)	Bedroom with ensuite	12.0	2.9	Yes	2 persons	10.0 (double ensuite)	✓ Exceeds
6 (FF)	Bedroom (shared bathroom)	7.2	Shared	No	1 person	6.5 (single shared)	✓ Exceeds
7 (FF)	Bedroom (shared bathroom)	10.3	Shared	No	2 persons	10.0 (double shared)	✓ Meets
8 (FF)	Bedroom (shared bathroom)	9.0	Shared	No	1 person	6.5 (single shared)	✓ Exceeds
9 (Loft)	Bedroom with ensuite	15.0	2.9	Yes	2 persons	10.0 (double ensuite)	✓ Exceeds

Total Occupancy: 16 residents

Total Ensuite Bedrooms: 6 (including 4 with kitchenettes)

Total Shared Bathrooms: 1 (serving Rooms 6, 7, and 8)

Communal Space Provision

Communal Area	Proposed Size (sqm)	Minimum Standard (Effective 8 residents)	Complies
Kitchen / Living Room	32.5	27.0	✓ Exceeds
Dining Room	12.0	11.0	✓ Exceeds
Total Communal Space	44.5 sqm	38.0 sqm minimum	✓ Exceeds

Notes:

- Communal provision has been calculated on an **effective catering demand of 8 residents**, recognising that **four rooms with kitchenettes (Rooms 1, 3, 5 and 9)** enable semi-independent meal preparation, reducing pressure on the shared kitchen.
- All bedrooms and shared facilities meet or exceed Gravesham Borough Council's HMO Licensing Standards and align with the NDSS as a benchmark.
- Communal kitchen and dining facilities exceed local and national HMO benchmarks, ensuring a **comfortable, sociable, and safe living environment** for all residents.
- Kitchenette Safety: The four in-room kitchenettes will include mechanical extract to external air, appropriate heat detection linked to the grade/category alarm, non-combustible splash protection and fire blankets, with layouts and isolation devices specified to meet Building Regulations and HMO licensing requirements.

The inclusion of six ensuite rooms provides a high degree of privacy, while shared facilities are proportionate and well-appointed. The layout has been tested to ensure compliance with **Building Regulations** in terms of space, light, ventilation, and circulation.

3.3 External Areas, Access, and Amenity Provision

The proposal includes well-organised external areas that provide essential facilities for residents while maintaining the visual quality and functionality of the site.

- Front Driveway:** The existing hardstanding will be retained to provide off-street parking and easy access for refuse collection.
- Rear Garden:** A generous rear garden is retained as shared outdoor amenity space for residents, providing opportunities for recreation, relaxation, and clothes drying.
- Cycle Storage:** Secure and covered storage for **sixteen bicycles** will be provided within the rear garden, accessible via a gated side passage.
- Bin Storage:** Dedicated and enclosed bin storage is proposed on the front driveway, screened from the street and designed for convenient access by both residents and collection services.
- Access:** A clear, unobstructed side passage will provide direct access to the rear garden and cycle store.

Amenity and External Standards Compliance Table

Amenity Provision	Proposed Provision	Standard Requirement / Guidance	Complies
Private Outdoor Amenity Space	Large shared rear garden	Suitable shared space for residents' use	✓ Exceeds
Cycle Parking	16 secure, covered spaces	Good practice consistent with Policy CS11	✓ Meets
Bin Storage	Enclosed front driveway store	Accessible and screened from public view	✓ Meets
Off-Street Parking	Existing front driveway retained	As existing; appropriate for sustainable location	✓ Meets

The external layout ensures residents enjoy a high standard of amenity while the property remains visually consistent within its residential setting. Bin and cycle stores are sensitively located to preserve the appearance of the street scene and facilitate sustainable travel choices.

3.4 Scale, Massing and Appearance

The proposed two-storey side extension has been designed to appear as a **natural continuation of the existing dwelling**, maintaining the established rhythm and proportions of development along Cross Lane East.

Key design considerations include:

- Retaining the existing eaves and ridge heights for visual consistency;
- Matching the brickwork, roof tiles, and fenestration style of the host property;
- Setting the extension slightly back from the main façade to appear subordinate; and
- Reflecting the scale and character of nearby dwellings to maintain visual harmony.

The resulting form will appear **balanced, proportionate, and sympathetic** to the surrounding townscape, fully compliant with **Policy CS19 (Development and Design Principles)** of the *Gravesham Local Plan Core Strategy (2014)* and **Paragraph 130** of the *NPPF (2024)*.

3.5 HMO Standards and Management

The property will be **professionally managed by the owner/applicant** and licensed in accordance with **Gravesham Borough Council's HMO Licensing Standards** and the **Housing Act 2004**.

Key management measures include:

- Full compliance with fire safety, alarm, and escape regulations;

- Regular cleaning and maintenance of shared areas;
- Clear waste and recycling management procedures; and
- Comprehensive tenancy agreements ensuring responsible occupation and neighbour consideration.

A formal **HMO Management Plan** will be implemented prior to first occupation to ensure effective oversight and compliance with all relevant housing and safety standards.

3.6 Sustainability

The proposal promotes **sustainable urban living** by optimising the use of an existing residential site within the built-up area, reducing the need for new land development. The site's close proximity to **public transport, local shops, and employment opportunities** encourages active and sustainable travel.

Where practicable, **energy-efficient lighting, insulation upgrades, and modern heating systems** will be incorporated as part of the refurbishment, consistent with the objectives of **Policy CS18 (Climate Change)** of the *Core Strategy* and **Paragraph 157** of the *NPPF (2024)*.

3.7 Summary

In summary, the proposed development involves the **demolition of the existing garage, erection of a proportionate two-storey side extension, and conversion of the property into a 9-bedroom HMO accommodating up to sixteen residents.**

The scheme:

- Makes efficient use of existing residential land within a sustainable urban location;
- Provides high-quality shared accommodation meeting and exceeding all relevant space and amenity standards;
- Maintains the residential character and appearance of Cross Lane East;
- Ensures appropriate provision for parking, cycle storage, and waste management; and
- Complies fully with both **local and national planning policy frameworks.**

Overall, the proposal represents a **sustainable and well-managed form of residential intensification** that aligns with the **housing, design, and sustainability objectives** of the *Gravesham Local Plan Core Strategy (2014)* and the *National Planning Policy Framework (2024)*.

4. Design and Appearance

The proposed development at **40 Cross Lane East** has been carefully designed to respect and enhance the established character of the surrounding residential area while providing a proportionate and well-integrated extension to the host property.

The design approach has been informed by a detailed understanding of the site's context, the prevailing built form along Cross Lane East, and the key principles of good design set out in the **National Planning Policy Framework (NPPF, 2024)** and the **Gravesham Local Plan Core Strategy (2014)**.

4.1 Context and Character

Cross Lane East is a well-established residential street characterised by two-storey terraced and semi-detached dwellings of traditional form and appearance. Properties generally display a consistent rhythm in height, scale and spacing, with modest variations resulting from past extensions and alterations.

The street's character is defined by:

- Brick and rendered façades with pitched tiled roofs;
- Shallow front gardens or paved forecourts used for parking;
- Regularly spaced fenestration patterns and modest roof forms; and
- Incremental domestic-scale extensions that have evolved over time.

The application site, positioned at the **end of a terrace**, occupies a prominent yet visually balanced location. The existing single-storey side garage provides an opportunity to rationalise the building's form and deliver a more coherent, architecturally consistent addition that complements both the host dwelling and the wider streetscape.

4.2 Design Principles

The proposal has been guided by key design principles that ensure the development remains sensitive to its surroundings while achieving a high standard of accommodation and appearance. These principles include:

1. **Respect for Local Character:**
The extension mirrors the massing, roof form, and detailing of the existing dwelling to maintain architectural coherence with the terrace. The proposed works will read as a natural continuation of the built form rather than a visually intrusive addition.
2. **Subordinate and Balanced Form:**
The two-storey side extension is **set back from the front elevation** and maintains the same **ridge and eaves height** as the existing dwelling, ensuring it appears proportionate and secondary to the main house. This approach helps to preserve the visual balance of the terrace and avoids a dominant or overbearing presence.
3. **Consistency in Materials and Detailing:**
External finishes will match those of the host property, including **brickwork, roof tiles, uPVC windows, and white-painted timber detailing** where appropriate. Fenestration proportions and window alignment have been designed to reflect the established pattern of the existing dwelling.
4. **Visual Integration with the Streetscape:**
The development reinforces the street's established building line and rhythm, while

the set-back of the extension maintains openness between properties and prevents any sense of enclosure or overdevelopment along Cross Lane East.

5. **Human Scale and Proportion:**

The massing of the proposal respects the scale of adjacent dwellings, ensuring that the extension does not appear visually dominant or disproportionate. The use of matching materials and consistent detailing helps the new addition blend seamlessly with the existing built form.

4.3 Architectural Form and Detailing

The proposed two-storey side extension has been designed to integrate architecturally with the existing dwelling, ensuring that the overall composition remains balanced and cohesive.

- The **roof pitch and ridge line** replicate those of the host dwelling, maintaining harmony within the terrace.
- The **front elevation** aligns with neighbouring properties, maintaining a consistent street frontage.
- The **window design and placement** reflect the existing dwelling's proportions, avoiding any discordant or asymmetrical appearance.
- The **rear elevation** is designed to minimise overlooking, with window positions carefully chosen to protect the privacy of adjoining properties.

The visual effect is of a **sympathetic and well-integrated extension** that appears as an inherent part of the original dwelling rather than an afterthought.

4.4 Streetscape and Visual Impact

A contextual analysis of the surrounding properties demonstrates that extensions of a similar scale are already present along Cross Lane East, contributing to a varied yet consistent suburban character. The proposed extension will therefore not appear incongruous or disproportionate within the street scene.

The proposal has been designed to:

- **Preserve the uniformity of the terrace**, avoiding visual imbalance or disruption to the established roofline;
- **Maintain adequate spacing** between properties, ensuring openness is retained; and
- **Enhance the street elevation** through coherent detailing and the use of quality materials.

In visual terms, the proposed development represents a **modest and proportionate enhancement** that strengthens the architectural continuity of the terrace. The resulting building will be visually compatible with the surrounding dwellings, ensuring the overall appearance of Cross Lane East remains attractive and coherent.

4.5 Materials and Finishes

To ensure full visual integration, the following materials are proposed:

- **Walls:** Red facing brick to match existing.
- **Roof:** Plain interlocking clay tiles matching the existing roof finish.
- **Windows and Doors:** White uPVC double-glazed units with simple horizontal proportions.
- **Rainwater Goods:** Black uPVC to match existing.

All materials have been selected to maintain consistency with the surrounding dwellings and ensure long-term durability and low maintenance. The approach is entirely consistent with the principles of **Policy CS19 (Development and Design Principles)**, which seeks to ensure high-quality, contextually appropriate design throughout the borough.

4.6 Policy Compliance

The proposed design accords fully with the relevant national and local design policies, as summarised below:

Policy / Guidance	Design Objective	Proposal Response
NPPF (2024) – Paragraph 130	Seeks developments that are visually attractive, sympathetic to local character, and provide a high standard of amenity.	The proposal integrates with local character through scale, materials, and detailing, while providing high-quality living conditions.
NPPF (2024) – Paragraph 134	Supports well-designed development that adds to the quality of the area over time.	The development contributes positively to the local built environment and will enhance the property's long-term function and appearance.
Policy CS19 – Gravesham Local Plan Core Strategy (2014)	Requires new development to respect local character, safeguard amenity, and achieve a high standard of design.	The proposed extension and conversion achieve these aims through sensitive design, appropriate materials, and scale consistency.

4.7 Summary

In summary, the proposed design:

- **Respects and reinforces** the character of Cross Lane East;
- Is **proportionate, subservient, and visually balanced**;
- Employs **materials and detailing** consistent with local architectural vernacular;
- Maintains **amenity, privacy, and visual openness**; and
- Aligns fully with both **local and national design policy** objectives.

The proposed extension and conversion therefore represent a **well-designed and visually coherent enhancement** to the existing property, ensuring that the development integrates harmoniously within its suburban context and contributes positively to the character and appearance of the wider area.

5. Planning Policy Context

This section sets out the national and local planning policy framework relevant to the assessment of the proposed development. It demonstrates that the proposal accords fully with the **National Planning Policy Framework (NPPF, 2024)** and the **Gravesham Local Plan Core Strategy (2014)**, and that it represents a sustainable and policy-compliant form of development within the existing urban area of Gravesend.

5.1 National Planning Policy Framework (NPPF, December 2024)

The **National Planning Policy Framework (NPPF)** provides the overarching policy guidance for local planning authorities and decision-makers in England. The central aim of the NPPF is to promote **sustainable development** through the integration of economic, social, and environmental objectives.

The following paragraphs of the NPPF are considered particularly relevant to this proposal:

Relevant NPPF Paragraph	Policy Objective	Relevance to Proposal
Paragraph 8	Defines the three overarching objectives of sustainable development – economic, social and environmental.	The proposal contributes to the local economy through investment in property improvement, supports social sustainability by providing additional housing choice, and reuses an existing building in an environmentally efficient way.
Paragraph 11	Establishes the presumption in favour of sustainable development.	The site lies within a sustainable urban area, close to public transport and services. The development optimises the use of land and supports the NPPF’s presumption in favour of sustainable growth.
Paragraph 60 & 69	Emphasises the need to deliver a sufficient and varied supply of homes, including the efficient use of existing land and buildings.	The conversion of an existing dwelling to an HMO increases housing capacity and choice, contributing to the Council’s housing targets without requiring new land release.
Paragraph 119	Encourages local authorities to make effective use of land and buildings, particularly in sustainable locations.	The proposal reuses an existing residential plot efficiently, providing additional accommodation while maintaining the residential character of the area.

Paragraph 130	Requires new development to be well-designed, add to the overall quality of the area, and provide a high standard of amenity.	The extension is designed to integrate seamlessly with the host dwelling, safeguarding visual character and ensuring good standards of amenity for residents and neighbours.
Paragraph 134	Supports decision-makers in approving well-designed development that enhances its surroundings.	The proposal is a positive design intervention that respects context, enhances local housing diversity, and makes a modest yet valuable contribution to the built environment.

In summary, the proposed development fully aligns with the objectives of the **NPPF (2024)** by promoting sustainable urban living, optimising the use of existing housing stock, and delivering high-quality accommodation that responds to identified housing needs within the local area.

5.2 Gravesham Local Plan Core Strategy (2014)

The **Gravesham Local Plan Core Strategy (Adopted 2014)** provides the strategic planning framework for the borough and sets out policies for sustainable growth, housing delivery, and design quality.

The following policies are most relevant to the proposed development:

Policy CS01 – Sustainable Development

Policy CS01 establishes that the Council will take a positive approach to development proposals that reflect the presumption in favour of sustainable development set out in the NPPF.

The proposal accords with this policy as it makes efficient use of an existing residential site within the urban area, contributes to housing supply, and is well-served by local infrastructure and transport networks.

Policy CS02 – Scale and Distribution of Development

This policy focuses new housing development within the urban area of Gravesend, where it can make the best use of existing services and public transport infrastructure.

The application site lies within the built-up area and represents a modest yet valuable form of **residential intensification**. The proposal therefore accords fully with **Policy CS02** by supporting growth within an accessible and sustainable location.

Policy CS09 – Housing and Economic Development

Policy CS09 seeks to deliver a balanced mix of housing types, sizes, and tenures to meet local needs, including smaller dwellings and shared accommodation options.

The proposed HMO contributes to this objective by diversifying the local housing stock and providing flexible, affordable accommodation for individuals and small households. The scheme therefore supports the Council's goal of achieving a balanced and inclusive housing market.

Policy CS11 – Transport

Policy CS11 promotes sustainable transport choices, prioritising walking, cycling, and public transport over car use.

The site is well-connected to public transport and local amenities, reducing the need for car dependency. Secure **cycle storage for sixteen bicycles** is included, and the existing front driveway provides limited on-site parking consistent with sustainable travel objectives. The proposal therefore meets the requirements of Policy CS11.

Policy CS18 – Climate Change

This policy supports development that minimises energy consumption, uses resources efficiently, and promotes sustainable construction practices.

The conversion and extension of the existing dwelling reduce the environmental impact compared with new build development, reusing existing materials and structure wherever possible. The design also includes modern insulation, efficient heating systems, and low-energy fittings in accordance with Policy CS18.

Policy CS19 – Development and Design Principles

Policy CS19 requires new development to be of a high design quality, respect local character, safeguard residential amenity, and deliver an attractive living environment.

The proposal fully complies with this policy:

- The two-storey side extension is proportionate and uses matching materials, ensuring design continuity.
- The internal layout provides high-quality accommodation that meets local space and amenity standards.
- The proposal safeguards neighbour privacy and daylight through careful design and window placement.

Accordingly, the scheme achieves the high design and amenity standards expected by Policy CS19.

5.3 Emerging Local Plan and Supplementary Guidance

While the emerging Local Plan is not yet adopted, the proposed development aligns with its key objectives of **increasing housing capacity**, **making efficient use of land**, and **promoting sustainable development** within existing settlements.

The proposal also meets the principles of the **Gravesham Borough Council HMO Licensing Standards**, ensuring appropriate room sizes, communal space, and facilities for all occupants. Compliance with these standards demonstrates the property's suitability for HMO use in terms of health, safety, and amenity.

5.4 Summary of Policy Compliance

The proposal represents a sustainable, well-designed, and policy-compliant form of development that supports both national and local planning objectives. It:

- Optimises the use of existing housing stock within the urban area;
- Provides high-quality, affordable accommodation in a sustainable location;
- Preserves the residential character of the area;
- Promotes sustainable travel and efficient land use; and
- Achieves a high standard of design consistent with Policy CS19 and the NPPF design principles.

Accordingly, the development fully accords with the **NPPF (2024)** and the **Gravesham Local Plan Core Strategy (2014)**, and it should therefore be **supported by the Local Planning Authority**.

6. Residential Amenity and Living Standards

The proposed development has been carefully designed to ensure that both existing and future residents benefit from a **high standard of residential amenity**, consistent with national and local planning policy objectives.

This section demonstrates how the scheme meets the relevant policy tests relating to internal space, natural light, privacy, outlook, noise, and external amenity, as well as its impact on the amenity of neighbouring occupiers.

6.1 Internal Amenity and Living Conditions

The proposed internal arrangement has been developed to provide a **comfortable, safe, and practical living environment** for all occupants, in line with Gravesham Borough Council's HMO Licensing Standards (with the NDSS used as a benchmark for internal quality) and the Housing Act 2004.

Each of the nine bedrooms has been designed to ensure adequate **floor area, natural light, ventilation, and outlook**. Six bedrooms benefit from **ensuite facilities**, and four include **individual kitchenettes**, allowing for increased privacy and convenience.

The communal kitchen, living and dining areas provide **44.5 sqm**, which **exceeds indicative minima for an effective catering load of eight residents**, reflecting that four double rooms have **in-room kitchenettes** and therefore materially reduce peak demand on the shared kitchen.

All habitable rooms are provided with large, double-glazed windows ensuring good levels of daylight and natural ventilation. The design avoids internal rooms without direct external openings, ensuring compliance with **Building Regulations Approved Document F (Ventilation)** and **Part L (Energy Efficiency)**.

In summary, the internal arrangement provides:

- Rooms exceeding minimum space and amenity standards;
- High-quality shared living and kitchen areas;
- Adequate privacy and convenience through ensuite facilities; and
- Good levels of daylight, ventilation, and circulation.

This ensures that the proposed HMO will provide a **safe, healthy, and pleasant living environment** for all future residents.

6.2 Privacy, Outlook and Daylight

The proposed development has been designed to ensure that there are **no adverse effects on privacy, outlook, or daylight** for neighbouring occupiers or future residents.

- **Window Placement:** All new windows are positioned to reflect existing fenestration patterns and avoid direct overlooking of neighbouring gardens or windows. Any upper-floor windows facing side boundaries will be fitted with **obscure glazing** where appropriate, in line with best practice and Council guidance.
- **Building Separation:** The proposal maintains appropriate distances between habitable room windows and neighbouring properties, consistent with local design standards.
- **Daylight and Outlook:** The scale of the two-storey side extension is modest and does not result in any significant loss of daylight or sunlight to adjacent dwellings. The orientation of the site and the relationship to adjoining plots ensures that no overshadowing or overbearing effects will occur.

The proposal therefore safeguards the **amenity, privacy, and visual comfort** of existing neighbouring residents while ensuring good levels of natural light and outlook for future occupants.

6.3 Noise and Disturbance

As part of the HMO conversion, the property will be **professionally managed** in compliance with the Council's **licensing and management regulations**, ensuring that the property operates responsibly and without adverse noise or disturbance to surrounding dwellings.

The following measures will be implemented:

- Enhanced **sound insulation** between rooms and party walls to meet **Building Regulations Part E (Resistance to Sound Transmission)**.
- Clear tenancy agreements and **house rules** to manage noise, waste, and general behaviour.
- Regular management inspections and maintenance to ensure the premises remains well-run and compliant with licensing standards.

The scheme has been designed and will be managed to ensure that the development operates quietly and respectfully within its residential context, consistent with the expectations of local policy and Environmental Health requirements.

6.4 External Amenity Space

The property benefits from a **large, private rear garden**, which provides ample external amenity space for residents to use for relaxation, outdoor dining, or drying clothes. The total rear garden area exceeds **70 sqm**, significantly surpassing the typical amenity requirement for shared accommodation of this scale.

This ensures that each resident has access to **usable, high-quality outdoor space**, supporting the health and wellbeing objectives of the NPPF. The garden is directly accessible from the communal areas, ensuring easy use and natural surveillance for safety.

In addition:

- **Secure cycle storage** for sixteen bicycles is located in the rear garden, promoting sustainable travel.
- **Bin storage** is provided at the front of the property within an enclosed and screened area, ensuring easy collection and maintaining a tidy street frontage.

Together, these provisions create a **functional, attractive, and well-managed external environment** that supports day-to-day living while maintaining the residential character of the site.

6.5 Relationship with Neighbouring Properties

The proposed two-storey side extension has been carefully designed to avoid any adverse impact on neighbouring amenity.

- The extension's **set-back and matching roof profile** ensure it does not appear overbearing or result in a loss of outlook for the adjoining dwelling.
- There will be **no loss of daylight or sunlight** to neighbouring habitable room windows.
- Rear-facing windows maintain a typical suburban relationship, consistent with the established character of the area.

- Boundary fencing and existing vegetation will continue to provide screening and privacy for adjacent gardens.

The overall massing and positioning of the extension are modest and sympathetic, ensuring that the development remains unobtrusive within the existing built form.

6.6 Compliance with Policy and Guidance

The proposed development fully satisfies the relevant policy requirements in respect of amenity, as summarised below:

Policy / Guidance	Objective	Proposal Response
NPPF (2024) – Paragraph 130(f)	Ensures developments create a high standard of amenity for existing and future users.	All rooms and communal spaces meet or exceed amenity standards; daylight, outlook, and privacy are fully protected.
Policy CS19 – Gravesham Local Plan Core Strategy (2014)	Requires developments to safeguard the amenity of existing residents and provide a high-quality living environment.	The layout, spacing, and management arrangements ensure that the development respects neighbour amenity while providing high-quality accommodation.
Gravesham Borough Council HMO Licensing Standards	Sets minimum requirements for internal space, facilities, and external amenity.	The proposal exceeds minimum space and facility standards for a 16-person HMO, including ample communal and private amenity space.

6.7 Summary

The proposed development has been carefully designed to provide **comfortable, spacious, and well-managed accommodation** for future residents, while ensuring **no harm to the amenity** of neighbouring occupiers.

Key points include:

- All internal and external spaces **exceed required standards**;
- Adequate daylight, ventilation, and privacy are ensured for all occupants;
- **Noise and waste management** measures are embedded into the design and operation; and
- The development remains **fully compatible with the residential character** of the area.

Accordingly, the proposal accords fully with **Policy CS19** of the **Gravesham Local Plan Core Strategy (2014)** and **Paragraph 130(f)** of the **NPPF (2024)**, delivering a **high standard of residential amenity** for both existing and future residents.

7. Parking, Access and Sustainability

The proposed development has been designed to ensure safe and efficient access for all users, adequate provision for parking, waste, and cycle storage, and strong alignment with sustainable transport and environmental objectives.

The site's sustainable location and close proximity to public transport, services, and employment opportunities support the efficient use of land and reduce the need for car dependency, consistent with the overarching aims of the **National Planning Policy Framework (2024)** and the **Gravesham Local Plan Core Strategy (2014)**.

7.1 Site Access and Circulation

The property is located on **Cross Lane East**, a well-connected residential road with direct links to **Valley Drive** and the wider Gravesend urban area. Vehicular access to the property is taken from the existing **dropped kerb and front driveway**, which will be retained as part of the proposal.

Key access features include:

- A **wide existing crossover** providing safe entry and exit from Cross Lane East;
- **Adequate visibility** in both directions for vehicles and pedestrians;
- A **front driveway** suitable for limited car parking and refuse collection access; and
- A **side pathway** providing direct access to the rear garden, cycle storage, and amenity area.

The proposal will not alter the established access arrangements and therefore **raises no highway safety concerns**.

7.2 Car Parking Provision

The property currently benefits from an off-street **front driveway**, which can accommodate one to two vehicles depending on layout.

Given the site's **highly sustainable location**, close proximity to **bus routes and Gravesend railway station (approximately one mile away)**, and the inclusion of secure cycle storage, this level of on-site parking is considered entirely appropriate for the proposed HMO use.

In determining appropriate parking levels, it is important to note that:

- HMOs typically generate **lower car ownership rates per resident** compared with standard family dwellings, as occupants are often single professionals or students who rely on public transport.
- The site lies within easy walking and cycling distance of shops, local facilities, and major transport connections.

- On-street parking along Cross Lane East operates safely and efficiently, with no existing restrictions indicating significant parking stress.

The proposed development therefore achieves a **balanced approach** to parking provision, promoting sustainable travel choices in line with **Policy CS11** of the Core Strategy and **Paragraph 111** of the **NPPF (December 2024)**, which states that development should only be refused on transport grounds if the residual cumulative impacts on the road network would be severe — which is not the case here.

7.3 Cycle Parking

The development provides **secure and covered cycle storage for sixteen bicycles** within the rear garden, accessed via a gated side passage.

This provision equates to one space per resident, **fully supporting the aims of Policy CS11** and aligning with good practice for HMOs and supporting the Council’s commitment to encouraging active travel.

The cycle storage will be weather-protected, lockable, and positioned discreetly to maintain the site’s appearance while promoting convenient use by residents.

7.4 Refuse and Recycling Storage

Adequate waste and recycling storage is provided in accordance with **Gravesham Borough Council’s waste management guidance**.

A dedicated, enclosed **bin storage area** will be located on the **front driveway**, screened from public view and positioned to allow:

- Convenient access for residents; and
- Direct collection by Council refuse services without obstruction or safety risk.

Provision will accord with GBC container sizes and collection frequencies (e.g., residual, recycling and food waste) and is sized for a 16-resident occupancy.

This arrangement ensures that refuse and recycling are managed efficiently and hygienically, maintaining the property’s visual quality and functionality.

7.5 Sustainable Transport and Accessibility

The development strongly supports **sustainable transport principles**, as it:

- Is located within walking distance of **bus stops on Cross Lane East and Valley Drive**;
- Lies approximately **one mile from Gravesend railway station**, offering frequent high-speed and mainline services to London and surrounding areas; and
- Provides **safe pedestrian and cycle access** via existing pavements and local routes.

These attributes significantly reduce the need for private car use and align with the Council's transport and climate policies. The scheme's design supports **multi-modal travel**, ensuring that future residents can easily access employment, education, and community facilities without reliance on the car.

7.6 Sustainability and Energy Efficiency

The proposal contributes to the environmental dimension of sustainable development by making **efficient use of existing urban land and built fabric**. Reuse and adaptation of an existing dwelling minimise embodied carbon compared with new build construction.

Sustainability measures will include:

- **Improved thermal insulation** to reduce heat loss and improve energy performance;
- Installation of **energy-efficient lighting and appliances**;
- Potential use of **air-source heating** or other low-carbon systems (subject to feasibility); and
- Enhanced ventilation systems to ensure internal air quality and occupant comfort.

These measures align with **Policy CS18 (Climate Change)** of the Gravesham Core Strategy, which encourages energy efficiency and adaptation to the effects of climate change.

7.7 Policy Compliance Summary

Policy / Guidance	Objective	Proposal Response
NPPF (2024) – Paragraph 111	Development should only be refused on transport grounds where residual cumulative impacts are severe.	The proposal uses an existing access, provides cycle and refuse storage, and has no significant transport impacts.
NPPF (2024) – Paragraph 105 & 112	Promotes sustainable transport modes and reduced car dependency.	The site's location and provision for walking, cycling and public transport align with these principles.
Policy CS11 – Transport	Seeks to improve accessibility and promote sustainable modes of travel.	The development includes secure cycle parking, maintains existing parking, and is located close to public transport routes.
Policy CS18 – Climate Change	Encourages energy efficiency and adaptation to climate change.	The conversion reuses existing fabric and integrates energy-efficient materials and systems.

7.8 Summary

In summary, the proposed development provides:

- Safe and established vehicular and pedestrian access;
- Appropriate on-site parking for its sustainable location;
- Secure, covered cycle storage for all residents;
- Convenient, screened refuse and recycling storage; and
- Sustainable travel and energy efficiency measures.

The proposal therefore **complies fully with Policies CS11 and CS18** of the **Gravesham Local Plan Core Strategy (2014)** and the relevant provisions of the **NPPF (2024)**. It represents a **sustainable, accessible, and responsible approach to development** that promotes active travel, reduces car dependency, and supports the Council's broader environmental objectives.

8. Management and Licensing

The proposed conversion of **40 Cross Lane East, Gravesend** into a **9-bedroom House in Multiple Occupation (HMO)** will be managed directly by the **owner/applicant**, ensuring responsible day-to-day oversight, compliance with all licensing requirements, and the ongoing maintenance of a high-quality residential environment.

The development will fully comply with the **Housing Act 2004**, the **Management of Houses in Multiple Occupation (England) Regulations 2006**, and **Gravesham Borough Council's HMO Licensing and Amenity Standards**.

8.1 Licensing Requirements

Under the **Housing Act 2004**, any property occupied by **five or more persons forming two or more separate households** who share basic amenities is required to obtain a **Mandatory HMO Licence**.

As the proposal seeks to create a **9-bedroom HMO for up to sixteen residents**, the owner/applicant confirms that the property will be licensed with Gravesham Borough Council prior to first occupation.

The application for licensing will be accompanied by the necessary certification, including:

- **Gas Safety Certificate** (annual renewal);
- **Electrical Installation Condition Report (EICR)** (every five years);
- **Fire Alarm and Emergency Lighting Certification**;
- **Portable Appliance Testing (PAT)** where applicable; and
- A comprehensive **HMO Management Plan**.

The owner/applicant will act as the **named licence holder and manager**, confirming a direct commitment to ensuring the property is operated safely, efficiently, and in accordance with the Council's regulatory framework.

8.2 Management Responsibilities

As the direct manager, the owner/applicant will maintain full responsibility for all operational aspects of the HMO, including:

- Regular **inspections** of the property to ensure safety, cleanliness, and compliance;
- Immediate response to **maintenance and repair requests**;
- Regular **cleaning and upkeep** of communal areas and external spaces;
- Oversight of **fire safety systems and equipment testing**; and
- Direct communication with residents and the local authority.

This hands-on management approach provides clear accountability and ensures consistent standards of care and maintenance throughout the lifetime of the property.

8.3 Safety and Compliance Measures

The HMO will comply fully with all safety and building regulation standards, including:

- Installation of an approved **interlinked fire detection and alarm system** throughout;
- **Fire doors** fitted to all bedrooms, kitchens, and circulation spaces;
- Clearly marked **fire escape routes** and, where required, emergency lighting;
- Safe and compliant **kitchen and electrical layouts**; and
- Regular testing and certification of **gas, electrical, and fire systems**.

All safety documentation will be kept up to date and made available to the Council's Private Housing and Licensing Team on request.

8.4 Tenant Management and Conduct

The owner/applicant will personally oversee tenant selection, orientation, and ongoing management, ensuring responsible occupation and harmonious relations with neighbouring residents.

Tenancy agreements will include clear clauses covering:

- **Noise and behaviour expectations**, including quiet hours;
- **Waste management procedures** and recycling;
- **Prohibition of subletting or unauthorised occupants**;
- Respect for **shared areas** and neighbours; and
- Immediate reporting of maintenance or safety concerns.

Regular communication with tenants and periodic inspections will help ensure that the property remains well-managed and that residents uphold standards of good conduct.

8.5 Maintenance and Upkeep

The owner/applicant will maintain the property to a consistently high standard through:

- A **planned maintenance schedule** for structural, electrical, and plumbing systems;
- Routine cleaning of **shared kitchens, bathrooms, and circulation spaces**;
- Regular **garden maintenance** and upkeep of external areas; and
- Prompt repairs and upgrades where required.

This proactive management strategy ensures the property remains attractive, compliant, and in good repair, preserving the visual quality and residential amenity of both the site and the surrounding area.

8.6 Waste and Recycling Management

A clear waste and recycling system will be implemented and monitored by the owner/applicant to prevent any nuisance or visual impact on the street.

- **Bin storage** will be located on the **front driveway**, screened and easily accessible for collection.
- **Recycling facilities** will be provided in accordance with Council guidelines.
- Tenants will receive clear instructions on waste separation and collection schedules as part of their induction.

This ensures effective refuse management and compliance with local environmental standards.

8.7 Management Plan Overview

A **formal Management Plan** will be maintained by the owner/applicant, setting out:

1. Contact details for the owner and emergency reporting procedures;
2. Regular inspection and cleaning schedule;
3. Fire safety management and record keeping;
4. Maintenance and servicing timetable for all safety systems;
5. Waste and recycling management procedures; and
6. Complaint and dispute resolution process.

This plan will ensure transparent, proactive, and responsible day-to-day operation of the HMO.

8.8 Summary

The HMO at **40 Cross Lane East** will be managed directly by the **owner/applicant**, ensuring that:

- The property is **properly licensed** and fully compliant with legal and safety requirements;
- **Maintenance, repairs, and inspections** are carried out promptly and consistently;
- **Tenant behaviour and community relations** are managed responsibly; and
- The property remains a **safe, clean, and well-maintained residential environment** at all times.

This direct, owner-led management approach ensures full accountability and demonstrates a strong commitment to maintaining high living standards and safeguarding local amenity.

The proposal therefore accords with the requirements of the **Housing Act 2004**, the **Management of Houses in Multiple Occupation Regulations 2006**, and **Policy CS19** of the *Gravesham Local Plan Core Strategy (2014)*, representing a **responsibly managed, high-quality HMO** that enhances the local housing offer and integrates harmoniously with the surrounding community.

9. Impact on Character and Neighbouring Amenity

The proposed development has been designed to integrate harmoniously with the existing residential environment of **Cross Lane East** and to ensure that there are **no adverse impacts on local character, amenity, or community cohesion**.

This section assesses the potential implications of the proposed HMO use and associated physical alterations in relation to local character, cumulative impact, and the amenity of neighbouring occupiers.

9.1 Local Character and Built Form

Cross Lane East is an established suburban street characterised by **two-storey terraced and semi-detached dwellings**, many of which have undergone **side and rear extensions** over time. The street displays a **coherent residential appearance**, but with modest architectural variation that reflects the natural evolution of the housing stock.

The proposed **two-storey side extension** has been designed to match the scale, form, and detailing of the existing dwelling, ensuring that the development reads as a natural continuation of the terrace rather than a dominant or discordant addition.

The extension's **set-back from the front elevation**, matching materials, and consistent roof profile all contribute to a visually balanced and proportionate outcome that **respects the character and rhythm of the street**.

Externally, the property will continue to appear as a single-family dwelling, preserving the domestic scale and appearance that define the area. The HMO use itself will not introduce any visual or physical changes beyond the residential norm, ensuring the **visual continuity and suburban character of Cross Lane East** are maintained.

9.2 Use and Community Character

The conversion to an HMO represents a modest **intensification of residential use** within a built-up area where mixed housing forms are already present.

Importantly:

- The use remains **entirely residential** in nature and compatible with surrounding dwellings.
- The scale of occupation (sixteen residents) is proportionate to the size of the property and the site.
- The building will be **professionally managed by the owner**, ensuring that the use operates quietly and responsibly.

The proposed HMO will cater to a specific segment of the housing market — typically **young professionals and key workers** — who contribute to the local economy and support local services. This aligns with the **social and economic objectives** of the NPPF and Gravesham's housing strategy, which seek to broaden the range of accommodation available within the borough.

There is **no evidence to suggest that the proposal would alter the social balance** or community cohesion of the area. The HMO will integrate seamlessly with existing residential uses and continue to function as part of the local community.

9.3 Cumulative HMO Impact

Policy CS09 (Housing and Economic Development) encourages a **balanced mix of housing** and resists over-concentration of any one housing type that could adversely affect neighbourhood character or amenity.

A review of the surrounding area indicates that **Cross Lane East** and its adjoining streets remain predominantly occupied by **single-family dwellings**, with only a small number of HMOs recorded nearby. A desktop review of Council registers and public listings indicates only a limited number of HMOs within the immediate 250–400 m radius. The introduction of a single, well-managed HMO at No. 40 would therefore not result in an overconcentration or change in the overall housing character.

The proposed HMO will maintain a **balanced residential composition**, ensuring the continued predominance of traditional C3 housing within the street.

As such, the development will **not undermine the social or environmental quality** of the local area and fully aligns with the objectives of Policy CS09.

9.4 Neighbouring Amenity

The proposal has been carefully designed to **protect the living conditions** of neighbouring occupiers in terms of daylight, outlook, privacy, and noise.

Daylight and Outlook:

The scale and siting of the two-storey side extension have been designed in accordance with established design principles. The extension does not project beyond the existing rear building line and will not cause loss of daylight or overshadowing to adjoining properties.

Privacy:

Window placement has been designed to mirror the existing arrangement, avoiding direct overlooking of neighbouring gardens or windows. Any side-facing windows (if required for bathrooms) will be fitted with **obscure glazing** to maintain privacy.

Noise and Disturbance:

The HMO will remain a **residential use** and is unlikely to generate noise beyond that associated with a typical large household. The owner’s direct management will ensure responsible tenant behaviour and adherence to house rules, minimising any potential impact on neighbouring residents.

In summary, the development preserves the amenity of adjacent properties and the overall quiet residential character of the area.

9.5 Visual Amenity and Streetscape

The proposed works represent a **high-quality and sympathetic enhancement** to the existing dwelling. The design maintains a coherent roofline, balanced proportions, and appropriate use of materials, ensuring the property continues to blend naturally into the terrace.

The **retention of the front driveway, screened bin storage, and tidy landscaping** will ensure that the development contributes positively to the street’s appearance.

The resulting building will not appear visually intrusive or incongruous and will instead **enhance the overall composition of the terrace**, consistent with **Policy CS19 (Development and Design Principles)** of the Core Strategy.

9.6 Policy Compliance

Policy / Guidance	Objective	Proposal Response
NPPF (2024) – Paragraph 130	Requires development to be sympathetic to local character	The proposal matches local architectural form, safeguards

	and to maintain a high standard of amenity.	privacy and daylight, and remains residential in character.
Policy CS09 – Housing and Economic Development	Promotes a balanced mix of housing and prevents harmful over-concentration of HMOs.	Only one HMO proposed within a predominantly C3 area – no harmful concentration or character change.
Policy CS19 – Development and Design Principles	Ensures development respects local character and safeguards neighbouring amenity.	The extension is proportionate, visually coherent, and protects neighbouring amenity.

9.7 Summary

The proposed HMO and associated extension at **40 Cross Lane East** will:

- Preserve the **residential character and appearance** of the street;
- Maintain a **balanced housing mix** within the local area;
- Safeguard the **amenity, privacy, and daylight** of neighbouring properties;
- Operate quietly and responsibly under **direct owner management**; and
- Deliver a **high-quality residential environment** consistent with local and national policy objectives.

Accordingly, the development fully accords with **Policies CS09 and CS19** of the *Gravesham Local Plan Core Strategy (2014)* and the design and amenity principles of the **NPPF (2024)**. It represents a **sensitive, well-managed, and sustainable form of residential intensification** that will integrate harmoniously within the existing community and contribute positively to local housing provision.

10. Planning Balance and Conclusion

This Planning Statement has demonstrated that the proposed **demolition of the existing garage, erection of a two-storey side extension, and conversion of the existing dwelling (Use Class C3) into a 9-bedroom House in Multiple Occupation (HMO) (Sui Generis) at 40 Cross Lane East, Gravesend, Kent DA12 5HB** constitutes a **sustainable and policy-compliant form of residential development**.

The proposal represents a well-considered response to the national and local policy objectives of **optimising the use of existing residential land, increasing housing choice, and delivering high-quality design** in appropriate urban locations.

10.1 Summary of Key Considerations

Efficient Use of Land and Housing Delivery

- The proposal makes **efficient use of existing urban land** by providing additional accommodation within the footprint of an existing dwelling, reducing the need for new land take or urban sprawl.
- It contributes to the borough's **housing supply and choice**, responding to a growing demand for smaller, flexible, and affordable living spaces suitable for professionals and individuals.

Design Quality and Character Integration

- The proposed **two-storey side extension** is proportionate, well-designed, and sympathetic to the existing end-of-terrace dwelling.
- Matching materials, roof form, and fenestration ensure the development is **visually integrated** within the established streetscape of Cross Lane East.
- The proposal will enhance the property's appearance and maintain the **coherent residential character** of the area.

High Standard of Residential Amenity

- All rooms and communal areas meet or exceed Gravesham Borough Council's HMO Licensing Standards and align with the NDSS as a benchmark.
- The internal layout provides **generous shared living and kitchen facilities**, good levels of daylight, privacy, and access to a large shared garden.
- The development will deliver a **comfortable, safe, and well-managed living environment** for all residents.

Neighbouring Amenity and Community Harmony

- The extension and conversion have been carefully designed to **protect the amenity, privacy, and daylight** of adjoining occupiers.
- The proposal will operate as a **quiet, responsibly managed HMO**, with direct owner oversight to ensure good neighbour relations and compliance with licensing conditions.
- The development will not result in any harmful over-concentration of HMOs and will maintain the **residential balance and community character** of the area.

Transport, Access, and Sustainability

- The property benefits from an existing **front driveway** and excellent access to **public transport**, including bus routes and Gravesend Railway Station (approximately one mile away).
- Provision for **sixteen secure cycle spaces** and enclosed **bin storage** supports sustainable transport and efficient waste management.
- The reuse and adaptation of the existing dwelling minimise embodied carbon, consistent with the objectives of **Policy CS18 (Climate Change)**.

Responsible Management and Operation

- The HMO will be **owned and directly managed by the applicant**, ensuring clear accountability, consistent maintenance, and strong compliance with **Housing Act 2004** requirements.
- A formal **Management Plan** will oversee safety, maintenance, and tenant conduct, ensuring the property remains an asset to the local area.

10.2 Compliance with Planning Policy

The proposal has been shown to comply with both **national and local planning policy**, including:

Policy / Guidance	Compliance Summary
NPPF (2024)	Supports the efficient use of land, delivery of diverse housing types, high-quality design, and sustainable development within urban areas. The proposal accords fully with these principles.
Policy CS01 – Sustainable Development	The site is located within the urban area and represents sustainable intensification of existing housing stock.
Policy CS02 – Scale and Distribution of Development	The proposal is located in a sustainable, accessible location within the built-up area of Gravesend.
Policy CS09 – Housing and Economic Development	The development provides a wider choice of accommodation, supporting local housing needs and maintaining community balance.
Policy CS11 – Transport	Encourages sustainable travel; the proposal provides cycle storage and benefits from public transport links.
Policy CS18 – Climate Change	The reuse of existing built fabric and inclusion of energy-efficient measures contribute to environmental sustainability.
Policy CS19 – Development and Design Principles	The proposal achieves a high-quality design that respects local character and safeguards residential amenity.

Collectively, these demonstrate that the proposal aligns with the **strategic vision** and **spatial objectives** of the *Gravesham Local Plan Core Strategy (2014)* and the sustainability objectives of the *NPPF (2024)*.

10.3 The Planning Balance

When assessed against the **planning balance test** in **Paragraph 11 of the NPPF (December 2024)**, the proposal represents clear and significant planning benefits with no demonstrable harm.

The benefits include:

- Delivery of **much-needed shared housing** in a sustainable location;

- **Efficient reuse of existing residential land** within the built-up area;
- Creation of a **high-quality, professionally managed HMO**;
- Enhancement of the property's **design and appearance** through a well-proportioned extension;
- Support for **local housing mix and affordability objectives**; and
- Compliance with all relevant **amenity, design, and management standards**.

There are **no material planning harms** arising from the proposal in respect of design, amenity, parking, or character. The development will operate responsibly and contribute positively to the local community.

10.4 Conclusion

In conclusion, the proposed development at **40 Cross Lane East, Gravesend** represents a **sustainable, well-designed, and policy-compliant enhancement** to the existing dwelling.

It:

- Provides **high-quality shared accommodation** that meets modern standards;
- Maintains and enhances the **visual and residential character** of the area;
- Protects the **amenity of neighbouring occupiers**;
- Promotes **sustainable travel and efficient land use**; and
- Will be **responsibly managed by the owner/applicant** to ensure ongoing compliance and community harmony.

Accordingly, the proposal accords with the **National Planning Policy Framework (2024)** and the **Gravesham Local Plan Core Strategy (2014)**.

It is therefore respectfully submitted that the proposed development represents a **sustainable and appropriate form of residential intensification**, and that **planning permission should be granted**.