



Architects

**Construction of a new two storey dwelling on
land to the side of an existing dwelling.
Demolition of existing single storey rear & side
extensions & the construction of a new single
storey rear extension to the existing dwelling**

at

**173 Singlewell Road, Gravesend
KENT
DA11 7QA**

Addendum - Planning Update Statement

30th October 2026

DAC Architects

Introduction

Since this planning application ref 2024/0390 was submitted in April 2024 there have been major changes to national planning policy and this document has been prepared in order to address these policy changes and to enable the application to be determined.

The Government published a major, comprehensive overhaul of the National Planning Policy Framework (NPPF) on 17 August 2026. The following parts of the new NPPF apply to this planning application:

Policy S4

This policy reads as follows, with notes added in red by DAC Architects:

1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:

a. Have a substantial adverse impact in relation to:

i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or **There is no change of use**

ii. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)). **The site is not recreation land, local green space or of particular importance for biodiversity and geodiversity**

b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or **the site does not provide any of these uses**

c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances. **None of which we are aware**

DAC Architects comment

The over-riding purpose of this important policy is that development proposals should be approved. The notes added to the list of adverse effects which may outweigh this presumption in favour of development contend that none of them apply to this planning application and that the application should therefore be approved.

It is noted that the list of adverse effects outweighing the presumption in favour are not restricted to the ones listed but it is also noted that any matters overturning the presumption in favour of development must have a substantial adverse impact. The Cambridge dictionary defines substantial as, 'large in size, value or importance'.

A previous planning application on this site ref 2021/1211 was refused on 13th December 2021. Four reasons were given for the refusal.

The first reason for refusal stated that 'The proposed development would result in the inappropriate subdivision of the residential garden and the creation of a new dwelling on a prominent corner location. The proposed development would severely impact on the character of the area and when combined with the scale and width of the building would result in the introduction of a prominent building that would appear as an incongruous and cramped form of development that would diminish the open character and appearance of the site, contrary to Policy CS14, CS15 and CS19 of the Gravesham Local Plan Core Strategy 2014 that requires new development to take into account the existing character of the area, and paragraphs 71 and 126 of the NPPF where plans should resist the inappropriate development of residential gardens where the development would cause harm to the local area and not result in the creation of high quality, beautiful and sustainable buildings and places'.

We do not understand how the subdivision of a large residential garden is inappropriate, especially as the size issue noted in the second reason for refusal has now been addressed (see below).

The main issue is the introduction of a 'prominent building that would appear as an incongruous and cramped form of development that would diminish the open character and appearance of the site'. This has been partly addressed by the reduced size of the proposed dwelling which is the subject of this planning application as opposed to the four bedroom dwelling which was the subject of the earlier planning refusal. The proposed dwelling has been very carefully designed to be a continuation of an existing terraced style pair of houses and is entirely in keeping with this section of Singlewell Road.

The changes incorporated into the design of the house shown on the current application go a long way to address the concerns expressed on the previous planning refusal and in our opinion do not create a substantial adverse impact meriting an overturning of the presumption in favour of development.

The second reason noted 'sub-standard garden areas for 173 Singlewell Road as well as the proposed dwelling'. This resulted from the addition of a bedroom to number 173 and the proposed dwelling having four bedrooms. This application omits the extra bedroom for 173 and reduces the size of the proposed dwelling to a 3 bedroom house. So this reason for refusal no longer applies.

The third reason contended that 'the proposed parking arrangement is unsatisfactory'. The layout has been revised. So this reason for refusal no longer applies.

The fourth reason for refusal noted that 'the proposal fails to safeguard biodiversity and fails to secure a contribution towards strategic mitigation measures'. It is believed that a contribution towards the RAMSAR site has since been paid but if this is not the case the client is happy to pay the sum required. Either way this reason for refusal no longer applies.

Policy H06

This policy reads as follows:

1. To support the provision of a diverse mix of sites, local plans should:
 - a. Allocate land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, and a further 10% on sites of between one and two and a half hectares, unless there are strong reasons why these targets cannot be achieved; and
 - b. Allocate sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services.

DAC Architects comment

The dismissed Planning Appeal ref APP/K2230/W/22/3290407 dated 15th September 2022 relating to a previous planning application for the construction of a single additional four bedroom house noted the following;

27. It is common ground between the parties that the Council cannot demonstrate a five year supply of deliverable housing sites. Based on the figures in the Council's delegated report, this is limited to 3.27 years supply. This represents a substantial shortfall where paragraph 11. (d) of the Framework would be triggered, to which I turn to consider below.

28. Whilst the Framework refers to boosting significantly the supply of housing, the provision of one additional dwelling would only make a small difference overall. The proposal would lead to some minor economic benefits through the construction and occupation of the dwelling, but these would be limited by the small scale of the proposal.

Policy H06 re-calibrates the impact of dwellings on small sites. The addition of a single new dwelling no longer needs to be compared with the entire housing shortfall of the council but a mere 10% of that shortfall. In other words this policy has the effect of multiplying the impact of a new dwelling on a small site ten fold. So the addition of this single dwelling can no longer be dismissed as making only 'a small difference overall'.

Planning Policy Discussion

The design of the host dwelling and the new dwelling has been revised to address the issues that were raised on the previous (refused) planning application. The changes are explained in detail in the design & access statement which accompanies the planning application so the changes will only be touched upon here:

- 1) The proposed dwelling is smaller and more appropriate for the site
- 2) The gardens now comply with local planning policy guidelines and,
- 3) The garaging, vehicle access and parking have all been completely revised.
- 4) The RAMSAR issues have been addressed

Whilst the changes to the proposals undoubtedly improve the application the recent changes to the national planning policy framework give a great deal of added weight to the application. In our opinion the NPPF gives much greater weight to the merits of the proposal whilst at the same time eroding much of the weight which had previously been attached to those matters which were considered contrary to the merits of the proposal.

Biodiversity Net Gain (BNG)

The exceptions for BNG have been revised removing the exemption which used to be offered for custom design/self-build however this has been replaced with a small sites exemption. The application site (both for the existing dwelling and the proposed dwelling) amounts to approximately 531 sqM, well within the criteria for small sites. A BNG report is not therefore required.

Conclusion

Taking all of the matters into account we respectfully request planning consent to be granted.