

Delegated Report

Householder Planning Application

Planning Application No: 20260066

Location: 49 Pier Road Northfleet Gravesend Kent

Description: Change of Use of dwelling to a self-contained one bedroom flat at basement level and a six bed, seven person HMO above, with rear outbuilding for cycle and bin stores.

Applicant: Mr. Gabriel Daramola

Site Visit Date: 27 January 2026

Submitted Documents/Plans

Application for Planning Permission form;
Red line site boundary plan;
Drawing no. Layout ID 01 Rev. 01-WIP Existing and proposed block plans, site location plan, 3D images and photographs;
Drawing no. Layout ID 02 Existing layouts, elevations and roof plan;
Drawing no. Layout ID 03 Proposed layouts, elevations and roof plan received 27 May 2026;
List of plans;
Planning Design and Access Statement 29 January 2026;
Photographs of project examples;
Noise & Fire Safety Statement;
Bin Management, Rubbish & Recycling Plan;
Household Management Plan;
Energy & Sustainability Statement;
Flood Risk Statement and Surface Water;
Heritage Statement 29 January 2026; and
Email from the agent received 27 May 2026

Superseded Documents/Plans

~~Drawing no. Layout ID 03 Proposed layouts, elevations and roof plan received 29 January 2026;~~
~~Planning Design and Access Statement 18 January 2026;~~
~~Heritage Statement 16 January 2026.~~

Procedural Issues

Following a request from the case officer, the proposed internal layout for the House in Multiple Occupation (HMO) was amended. As a result, the description of the development was amended from 'Change of Use of dwelling to a self-contained one bedroom flat at basement level and a seven bed, seven person HMO above, with rear outbuilding for cycle and bin stores.' to that shown at the start of this report.

The amended plans were subject to additional consultation but as they only comprised of internal alterations, no additional publicity was undertaken.

Relevant Planning History

Reference	Description	Decision	Decision Date
20251258	Proposed Lawful Development Certificate for change of use from dwellinghouse (Use Class C3) to house of multiple occupation for up to 6 residents (Use Class C4).	Certificate Granted	30.01.2026

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS03 – Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- H5 – Increasing Housing Stock by the Conversion of Existing Buildings
- T1 – Impact of Development on Highway Network
- P5 – Exceptions to the Vehicle Parking Standards – Change of Use of Buildings
- TC3 – Development Affecting Conservation Areas
- TC7 – Other Archaeological Sites

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 5 – Delivering a Sufficient Supply of Homes
- Section 9 – Promoting Sustainable Transport
- Section 11 – Making effective use of land
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

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

- Design for Gravesham – Design Code (2024)
- Guidance for HMO Amenity Standards (2025)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

GBC - Service Manager (Housing Options)

Fourth response:

Thank you for your recent consultation request regarding the above-mentioned proposal. Our observations are as follows, in relation to Drawing No Layout ID 03.

If the utility, on the ground floor, will house any white goods it is considered a high-risk area, and a fire-resisting door (minimum FD30) must be installed to protect the means of escape.

We would welcome a 7 person 6 household HMO.

Where the HMO is the applicants preferred option, the team welcomes a conversation or site visit to the premises to discuss licencing and amenity requirements at the earliest opportunity. Gravesham Borough Councils amenity standards can be found on our website at

<https://www.gravesham.gov.uk/licensing/houses-multiple-occupation-1>

Third response:

We have had a catch up with the owner and the following adjustments must be made to the property for it

to meet HMO standards. We have done a slight reshuffle of the rooms of occupancy so that it meets amenity standards without compromising occupancy total.

Please see below:

- Ground floor bedroom 7 will now be double occupancy, bedroom and living space only.
- Bedroom 1 on first floor to be converted into communal living/dining space for tenants.
- Utility room needs a fire rated door installed.
- Communal bathroom door on second floor to swing inwards and not outwards onto means of escape.

Confirmed new occupancy table:

Bedroom 1	To be communal living/dining space
Bedroom 2	1 (one) occupant
Bedroom 3	1 (one) occupant
Bedroom 4	1 (one) occupant
Bedroom 5	1 (one) occupant
Bedroom 6	1 (one) occupant
Bedroom 7	2 (Two) occupants
Total	7 (Seven) occupants

Second response:

The layout for the flat looks fine.

Initial response:

Thank you for your recent consultation request regarding the above-mentioned proposal. Our observations are as follows, in relation to Drawing No Layout ID 03.

Bedroom 1 (8.93m²) and Bedroom 4 (8.76m²) are undersized. Where rooms fall below 10m² required for combined bedroom and living space for single occupancy, additional communal space must be provided within the dwelling.

If the utility, on the ground floor, will house any white goods it is considered a high-risk area, and a fire-resisting door (minimum FD30) must be installed to protect the means of escape.

The current plans show the door for the off-suite for bedroom 4 opening out onto the means of escape. It is recommended that the direction of the door swing is changed.

We would welcome a 6 person 6 household HMO.

Where the HMO is the applicants preferred option, the team welcomes a conversation or site visit to the premises to discuss licencing and amenity requirements at the earliest opportunity. Gravesham Borough Councils amenity standards can be found on our website at <https://www.gravesham.gov.uk/licensing/houses-multiple-occupation-1>

GBC Conservation Officer

Providing there are no external alterations then there are no adverse comments.

GBC Environmental Protection Team (Regulatory Services)

Second response:

The agent is quite correct that insulation is covered by building regs, but in some instances, 'upgraded' insulation is needed particularly where there are conflicting room uses over/under each other which can result in noise problems. As mentioned before, we don't have powers to deal with this type of problem should complaints arise once the HMO rooms are occupied.

The agent mentions moving the pipework onto the wall of the host bedroom which would help. Otherwise, the condition we usually recommend for conflicting uses is as follows, but it does seem a bit excessive in this situation and is usually used for where there is residential over commercial:

Internal noise:

Prior to the first occupation of the flat, a sound insulation assessment shall be carried out, submitted to and approved in writing by the Local Planning Authority. The Assessment shall include details of the assessment methodology and the sound insulation performance of the internal wall partitions, internal floor/ceiling partitions, adjacent party wall partitions and the partition between the commercial on the ground floor and the flat above.

The sound insulation performance of partitions between the floors of the flat and any adjacent residential property shall resist the transmission of airborne sound and impact sound to demonstrate that the minimum levels stated in the Building Regulations are capable of being complied with. The assessment will also include details of any proposed works to achieve these levels.

The construction that separates the residential and commercial unit shall aim to resist the transmission of airborne sound such that the weighted standardised difference ($D_{nT, W} + C_{tr}$) shall not be less than 53 decibels (i.e. an enhancement of the minimum levels stated in the Building Regulations of 10dB). The assessment will also include details of any proposed works to achieve these levels.

Any works identified being required in order to achieve these minimum levels shall be implemented and evidence provided (if necessary, by way of a further sound insulation assessment report) for approval by the Local Authority prior to first occupation. Overheating and ventilation must also be considered in the design of any mitigation.

I think in this instance, we'll have to rely on Building Regs.

Initial response:

Whilst there is no objection as such to this application, it's noted that the en-suite shower rooms for bedrooms 2 and 6 are formed from part of the adjacent bedrooms. This could result in noise problems for these rooms if the ensuites are used late at night/early in the morning, so it is imperative that the partition walls are appropriately robust. If noise problems arise in the future, Environmental Protection would not be able to deal with any complaints under statutory nuisance legislation.

STG Building Control Partnership

Please be advised an application will be required for building regulations and we have yet received one of these.

KCC - Dartford Group Fire Safety Office

Upon reviewing the available plan drawings on the Gravesham planning portal, I note the access road leading to the existing premises appears to be unaffected by the proposed works. However, with the conversion of the property to create a 7-bedroom HMO and 1-self-contained flat, please ensure that 45m hose distances can be achieved to all parts of the building from a suitably parked position.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

Kent Police Designing Out Crime Team

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED)

and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
2. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.
3. Any pre-existing and new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
4. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) Guide 2025 states: "19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features." Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
5. If new external doorsets are proposed (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors, we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
6. If new windows are proposed on the ground floor and any window that is easily accessible on any other level e.g. from flat roofs or balconies, we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
7. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.
8. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.
9. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
10. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents. For cycle storage, we advise on the use of ground/ wall SBD or sold secure anchors within a lockable shed or storage area.

11. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along with a freestanding post box of SBD/Sold Secure approved Gold standard. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the ground floor to prevent access to all areas.

12. CCTV is advised for all communal entry points and to cover the mail delivery area.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

GBC Licensing Team (Regulatory Services)

No response received.

GBC Waste & Recycling Manager

No response received.

Neighbouring properties

The application was publicised by a site notice, press notice and to 16 neighbouring properties by letter. No representations have been received. The overall consultation period expired on 06 March 2026.

Officer's Analysis

Housing need

Gravesham is currently unable to demonstrate a 5-year housing land supply. Based on data for the period 2022-2027, the Council can only demonstrate a supply of 3 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Policy CS02 of the Gravesham Local Plan Core Strategy (2014) must be regarded as out of date. As required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024), this requires that in regard to housing development, planning permission should be granted unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The policies referred to in paragraph 11(d)(i) above are those set out in the NPPF 2024 at footnote 7 relating to any of the following:

- Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast;
- irreplaceable habitats;
- designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and

- areas at risk of flooding or coastal change.

The application site is located in a conservation area and therefore affects a designated heritage asset.

The policies referred to in paragraph 11(d)(ii) above are those set out in the NPPF 2024 at footnote 9 relating to paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12 of the NPPF 2024.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against these paragraphs, development plan policy, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development for a net increase of one residential unit would offer a minimum contribution towards meeting local housing need and this should be accorded appropriate weight in support of the application. HMO's do not contribute to the local need. However, this has to be balanced against other requirements of the Development Plan and the NPPF 2024 which require new development to be well designed, to make effective use of land, to create acceptable living conditions for future and existing occupiers, to provide safe and suitable access and to contribute to and enhance the natural and local environment. These issues will be discussed in detail in the sections below.

Principle of HMO conversion and proposed flat

The application site is located within the Northfleet Embankment & Swanscombe Peninsula East Opportunity Area and as such, Policy CS03 of the Gravesham Local Plan Core Strategy (2014) is relevant. Policy CS03 sets out that the Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. In the pre-ambles to the policy, the local plan highlights that the existing Rosherville North and Landsdowne Square Residential Area (where the application site sits) is unlikely to be subject to substantial change but that development should be designed to improve connectivity and access to the riverside.

Policy CS14 of the Gravesham Local Plan Core Strategy (2014) seeks to protect the mix of housing in the existing stock and to restrict the conversion of family sized units into smaller properties. In the preamble to this policy family homes are defined as homes with two or more bedrooms. It also states that new housing development should provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Saved Policy H5 of the Gravesham Local Plan First Review (1994) provides criteria for considering proposals for the conversion of dwellings away from single family use. It states that buildings shall be in an appropriate area for conversion; that unless there are special or overriding circumstances, conversion will not normally be permitted in an area comprised for the most part of single-family dwellings; that conversion will not normally be permitted in areas environmentally unsuitable for young families and which already demonstrate a predominance of HMOs; that the building shall be of such a size and arrangement to be generally unsuitable for single-family occupancy; that regard shall be had to the Borough Council's adopted Residential Layout Guidelines; and that Vehicle Parking Standards must be achieved wherever feasible.

The application site is located in an area where many of the surrounding properties have been converted into flats/maisonettes and to the south, there are a number of two storey residential units. Therefore, the area is characterised by single family dwellings. The application property was previously a six bedroom dwelling but it has been vacant for some time and is in a poor state of repair. Given the number of bedrooms, height of the building and overall number of rooms within the property, the size and internal arrangement of the application building would lend itself to an HMO use.

It is noted that a lawful development certificate for the change of use of the application property from a dwellinghouse (Use Class C3) to a HMO for up to six residents (Use Class C4) was granted in January 2026. Therefore, the application site could lawfully be used as a six person HMO without the need for planning permission. As such, it could be argued that this proposal would only increase the potential HMO occupancy by one person.

Whilst the introduction of an HMO would be out of character with the surrounding single family dwellings, the use would be similar to that of a large dwelling occupied by a large family or a large property converted into flats, which would be in line with the surroundings. In addition, the introduction of a basement flat, would be entirely in keeping with the character of the surrounding area.

Overall, the proposed development would add to the range of residential accommodation in Gravesham without detracting from the character of the surrounding area. Therefore, the proposal would be in line with Policy CS03 of the Gravesham Local Plan Core Strategy (2014) and broadly in line with Policy CS14 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy H5 of the Gravesham Local Plan First Review (1994) and be acceptable in principle.

Design, Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy (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.

The application site is located in the Lansdowne Square, Northfleet Conservation Area and therefore in this report, special attention has been paid to the desirability of preserving or enhancing the character or appearance of the area, as set out in Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Policy CS20 of the Gravesham Local Plan Core Strategy September (2014) places a high priority on the preservation, protection and enhancement of its heritage and historic environment. Saved Policy TC3 of the Gravesham Local Plan First Review 1994 sets out that development within or affecting conservation areas will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area.

The proposed development would not result in any external alterations to the application building and the GBC Conservation Officer has not raised any objection. A cycle store (for the HMO) and refuse storage (for both residential units) would be provided in the rear garden (although full details have not been submitted). The proposed cycle and refuse storage would not be widely visible or be out of character with the surrounding area and full details of these can be subject to appropriately worded planning conditions.

Overall, the proposed development would be appropriate in terms of design and would not have an adverse impact on the character or appearance of the existing property, the surrounding area or the Lansdowne Square, Northfleet Conservation Area. Therefore, the proposal would be in line with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy TC3 of the Gravesham Local Plan First Review (1994).

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

In relation to the proposed internal layout for the HMO, the Guidance for HMO Amenity Standards (2025) includes minimum bedroom sizes and layout guidance for kitchens, dining areas and living areas and the

advice of the GBC Service Manager (Housing Options) is relevant. She has advised that a 7 person, 6 household HMO would be welcomed and it is noted that the applicant has amended the proposed layout in line with her advice. The GBC Service Manager (Housing Options) has also set out that the proposed layout for the basement flat would be acceptable.

The requirement for a fire door set out by the GBC Service Manager (Housing Options) can be brought to the attention of the applicant in an informative attached to any planning permission granted.

For the basement flat, the proposed bedroom would exceed the minimum floor area requirement for a double bedroom in the Nationally Described Space Standard (2015) and the total floor area would exceed the minimal floor area requirement for a one bedroom, two person, single storey dwelling. Natural light would be provided for the proposed bedroom and living areas via existing windows.

A refuse storage area would be located at the rear of the proposed basement flat and a separate refuse store would be located in the rear garden for the HMO, which can be subject to conditions which require details to be approved and for them to be provided and retained permanently.

External amenity space would be available at the rear of the property, which would be beneficial to the living conditions of future occupants.

It is noted that the GBC Environmental Protection Team (Regulatory Services) initially raised concerns regarding the potential for adverse noise/disturbance impacts for the future occupiers from the use of adjoining ensuite shower rooms, unless their partition walls are constructed appropriately. However, alterations to pipework were suggested by the applicant to mitigate this impact and the sound insulation issue would be covered by the Building Regulations process.

In order to prevent a loss of privacy for future occupiers, any proposed bathroom/w.c./en-suite windows should be conditioned to be permanently obscure glazed.

Overall, the proposed development would provide appropriate living conditions for future occupiers and as such, the proposal would not be detrimental to residential amenity and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring occupiers. In this regard, the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

Due to the design of the proposed development and to the layout and orientation of surrounding properties, there would be no adverse overlooking, overshadowing or overbearing impacts to any of the surrounding residential occupiers.

The introduction of an HMO use could have the potential for adverse noise and disturbance impacts to neighbouring occupiers. However, no objection has been raised by the GBC Environmental Protection Team (Regulatory Services) and any increase in residential occupiers would not lead to significant harm, over and above that which would be expected from a large residential property.

Overall, 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

Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 requires 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 P5 of the Gravesham Local Plan First

Review (1994) allows a relaxation of the vehicle parking standards for changes of use of buildings and the sub-division of existing dwellings in certain circumstances and provided that existing on-street parking problems are not unduly exacerbated.

The proposed development would result in the application property increasing from a six bedroom dwelling to a seven person HMO with a self-contained basement flat. No on-site car parking would be available but cycle parking for seven cycles would be provided in the rear garden and a cycle storage area would be provided adjacent to the front entrance of the basement flat.

The proposed cycle parking should be subject to a condition on any planning permission granted, to ensure that the details are approved and that it is provided and retained permanently.

It is noted that the application site is located in a relatively sustainable location, close to local shops and services and various bus routes. Therefore, occupiers would not be entirely dependent on a private vehicle for transport. There are no parking restrictions in Pier Road and on street parking appears readily available.

Although the proposed development would result in a relatively small increase in demand for on-street parking in the surrounding area, this would not undermine highway safety. As such, the proposal would be broadly in line with Policy CS11 of the Gravesham Local Plan Core Strategy (2014) and Saved Policy P5 of the Gravesham Local Plan First Review November 1994.

Ecology and Biodiversity

Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 states that sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites. It also states that, where a negative impact on a protected or priority habitat/species cannot be avoided, compensatory provision will be required.

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering waterbirds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Borough Council have decided to impose a tariff on new housing development. Developers will need to pay £350.16 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

The proposed development would result in the creation of an additional residential unit (the basement flat) and as such, additional recreational activity would result. It is noted that an appropriate SAMMS tariff payment has been made.

It is also noted that the proposed HMO would not result in any increase in the number of bedrooms at the application property. Therefore, there is no need for a SAMMS tariff payment to be made for this aspect of the proposal.

Overall, the recreational disturbance impact arising from the proposal would be effectively mitigated. As such, the proposed development would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy September 2014.

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. One exception is where development is subject to the de minimis exemption. This is when development does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat or 5 metres of linear habitats such as hedgerows.

In this case, there are no external changes proposed, except to provide a cycle and bin store at the rear (with a footprint of some 9 square metres). Therefore, the development would meet the criteria for 'de minimis' exception and the statutory requirement for BNG would not be applicable.

Any Other Material Planning Considerations

The application site is located within an area of multi-period archaeological potential. However, as the proposed development is 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. As such, the proposal would be in line with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located in an area where an Article 4 Direction is in force (reference Ar/09/1). The Article 4 direction removes various permitted development rights for dwellings, meaning that planning permission would be required for most alterations to the existing application property. In the Article 4 Direction, the following parts of the of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) have been removed;

- Part 1, Class A (enlargement, improvement or alteration of a dwelling),
- Part 1, Class C (alterations to the roof of a dwelling)
- Part 1, Class D (erection of porches on a dwelling)
- Part 1, Class H (installation, alteration or replacement of microwave antenna on a dwelling);
- Part 2, Class A (erection, construction, maintenance, improvement or alteration of a gate/wall);
- Part 31, Class B (demolition of a building).

It is noted that the proposed elevation drawing (reference Layout ID 03) is annotated to refer to refurbishment/repainting works for the front of the building and the front door and to the refurbishment/replacement of front windows but no details of these works have been provided. As such, these works do not form part of this proposal. The applicant can be informed, via an informative attached to any planning permission granted, that such works may require planning permission in themselves.

The comments received from STG Building Control Partnership, KCC Dartford Group Fire Safety Office and the Kent Police Designing Out Crime Team can be brought to the attention of the applicant by informatives attached to any planning permission granted.

Suggested Conditions

Time Limit

- Development in accordance with the approved plans
- Obscure glazing to en-suite/w.c. windows
- Prior to occupation details of refuse storage
- Prior to occupation details of cycle storage for HMO
- Provision and retention of cycle storage for basement flat
- Maximum occupancy for HMO

Conclusion

The proposed development would be located in a sustainable, urban area and would add to the range of residential accommodation in Gravesham, without detracting from the character of the surrounding conservation area. The proposal would be acceptable in terms of design and layout and it would safeguard the residential amenity of future and neighbouring occupiers and would have no adverse highways,

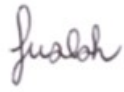
ecological or archaeological impacts.

As such, the proposal would comply with local and national planning policies and subject to the conditions set out above, the proposal would be acceptable.

Recommendation

Planning permission subject to conditions is recommended.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	26th June 2026	Dated:	26 June 2026