



Delegated Report

Householder Planning Application

Planning Application No: 20231070

Location: 24 St Georges Crescent Gravesend Kent DA12 4AR

Description: Erection of one bedroom bungalow and provision of off street car parking space.

Applicant: Mr Saab Singh

Site Visit Date: 3rd November 2023

Submitted Documents/Plans

Application Form
FV-2023-04 – Location Plan
FV-2023-01 – Existing and Proposed Plans
FV-2023-02 – Proposed Plans
FV-2023-03 – Proposed Elevations
FV-2023-04 – Existing Plan
Design and Access Statement

Relevant Planning History

No relevant planning history for subject property.

Relevant planning history on nearby properties 26/26A St Georges Crescent:

	Description	Decision	Decision Date
20231067	Change of use of two garage outbuildings at the rear to two storage outbuildings and formation of replacement car parking space in front garden of no. 26A.	Pending Consideration	N/A
20190737	Erection of a new 3 bedroom dwelling with garage, parking spaces and associated	Permitted	25.09.23

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision Making
- Section 12 – Achieving Well-designed Places

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);
- Householder Extensions/Alterations Design Guide (2021)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Highways Officer

This proposal raises some concerns.

As a single bedroom dwelling only one parking space is required, but to conform to the requirements of SPG4 issued by Kent County Council the parking space adjacent to an enclosing boundary should be a minimum of 2.7 metres wide to provide the space that would normally be borrowed from an adjacent space. See last sentence of Note 2 on the below extract from SPG4.

B8. The preferred sizes for parking bays in Kent provided as part of development proposals are:

	Length	Width
Parking Bay Size for Powered Two-Wheelers ⁽¹⁾	2.5m	1.5m
Parking Bay Size for Cars ⁽²⁾	5.0m	2.5m
Parking Bay Size for People with a Mobility Handicap	5.5m	3.6m
Parking Bay Size for Light Goods Vehicles	7.5m	3.5m
Parking Bay Size for Minibuses ⁽³⁾	8.0m	4.0m
Parking Bay Size for Coaches ⁽³⁾	14.0m	4.0m
Parking Bay Size for Rigid Heavy Goods Vehicles	12.0m	3.5m
Parking Bay Size for Articulated Heavy Goods Vehicles	16.0m	3.5m
Notes:	1. A minimum space of 1.0m should be allowed between each motorcycle. 2. Where car parking spaces are provided parallel to, and abutting, a carriageway, aisle or drive the preferred bay size should be 6.0m x 2.5m to allow vehicles to manoeuvre into the bay when adjoining bays are occupied. The width of end spaces abutting an enclosed boundary should be increased to 2.7m 3. A width of 4.0m is the minimum necessary to allow passengers to embark and disembark safely.	

In addition to conform to the requirements of the above SPG4 a cycle parking space is required in addition to the parking space.

Minimum Cycle Parking Standards

Individual residential dwellings ⁽¹⁾	1 space per bedroom
Flats & maisonettes ⁽²⁾	1 space per unit
Sheltered accommodation ⁽²⁾	1 space per 5 units
Notes:	1. Cycle parking provision should normally be provided within the curtilage of the residential dwelling. Where a garage is provided it should be of a suitable size to accommodate the required cycle parking provision. 2. Parking provision should be provided as a secure communal facility where a suitable alternative is not available.

In addition, the width of the access is slightly less than the guidance in Building Regulations.

15.10 Dead-end access routes longer than 20m require turning facilities, as in Diagram 15.3. Turning facilities should comply with the guidance in Table 15.2.

Table 15.2 Typical fire and rescue service vehicle access route specification						
Appliance type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	12.5
High reach	3.7	3.1	26.0	29.0	4.0	17.0

NOTES:

1. Fire appliances are not standardised. The building control body may, in consultation with the local fire and rescue service, use other dimensions.
2. The roadbase can be designed to 12.5 tonne capacity. Structures such as bridges should have the full 17-tonne capacity. The weight of high reach appliances is distributed over a number of axles, so infrequent use of a route designed to accommodate 12.5 tonnes should not cause damage.

The minimum width shown on the submitted drawings is 3.475m compared to a minimum requirement of 3.7 metres in Building Regulations, but this is a matter for the Fire Service and Building Control.

There is also the issue that the new bungalow can only be accessed via an unlit alley way, with minimal if any overlooking and no lighting. The alley would be a shared surface with no demarcation between vehicles and pedestrian routes. Although pedestrian and vehicle movements would be limited; it would not be a particular safe environment to negotiate particularly as a pedestrian, as a driver will concentrate on driving the vehicle between the boundary treatments and negotiating the bend in the alley, which has restricted forward visibility, although it is accepted that vehicle speeds will be low.



Google Street View November 2022

As shown, the car parking bay does not conform to guidance and there is no provision for parking a cycle which I consider to be unacceptable. In addition, although not supported by policy or guidance, I believe some illumination needs to be provided to provide for a safe and attractive accessway along the alley during the hours of darkness.

Neighbouring properties

The final date for submission of comments ended on 24th November 2023. A site notice was placed on 3rd November 2023. 4no. surrounding properties were consulted, and 0 comments were received from members of the public.

Officer's Analysis

The Key Issues

The key planning considerations in the assessment of this revised application are as follows:

- The Principle of the Development
- Design and Impact of the Development on the Character and Appearance of the Area
- Suitability of the accommodation for future occupiers and compliance with local/national standards
- Impact on Local Residential Amenity
- Parking and Highway Issues
- Other Material Considerations - ecology/refuse arrangements etc.

The below images were taken during the site visit and provide visual context.





Principle of the Development

Policy CS02 Local Plan Core Strategy (LPCS) prioritises development in the urban area as a sustainable location for development. Policy CS02 seeks to achieve this by: Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. The site is within a sustainable location within an urban residential area as per Policy CS02.

The National Planning Policy Framework (NPPF) is explicit that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 119 advises that *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*

The NPPF defines 'Previously Developed Land' as follows:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

The application site does not meet the definition as previously developed land as it is within an existing

residential garden.

Housing Need and Sustainability

Local Plan Core Strategy Policy CS02 sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for over 6,000 new dwellings in that time. Evidence now available shows that the Council is not able to currently demonstrate a five-year housing supply.

Given Gravesham's current inability to demonstrate a 5 year housing land supply (a 2.9 year supply has most recently been calculated within the statement published here:

<https://www.gravesham.gov.uk/downloads/file/266/5-year-housing-land-supply-statement-2022-2027>)

As the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF. 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.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 6 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF paragraph 181)
- Sites of Special Scientific Interest;
- Green Belt,
- Local Green Space,
- Areas of Outstanding Natural Beauty
- Irreplaceable habitats;
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 68); and
- Areas at risk of flooding or coastal change.

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 development plan policy, the need to make efficient use of land (paragraph 125(c)) in context, 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 residential development/use of the site supports the Governments greater emphasis on delivering and prioritising housing land as set out in the current version of the NPPF (section 5 - delivering a sufficient supply of homes).

The redevelopment of sites within the urban area can help reduce the pressures for the release of fresh land in rural locations, which is of particular importance in a Local Authority constrained by Green Belt policy. This would be in conformity with paragraphs 120 and 141 of the NPPF. Evidence of land scarcity can be found in Table 7 of the Five-Year Housing Land Supply Statement 2022-2027 (dated March 2023), which identifies a shortfall in the supply of housing sites of 1,785 dwellings.

Therefore, the development of the site for a net increase of 1 unit would offer a minimal contribution towards meeting this local need and, accordingly, weighs in support of this application.

However, this has to be balanced against other requirements of the NPPF and in particular paragraphs 130 and 134 of the NPPF which requires development to add to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the National Planning Policy Framework (NPPF) and established local planning policy taken as a whole. There are a number of other material planning issues that need very careful consideration in the assessment of this application.

Design, Character and Appearance

Policy CS19 of the Gravesham Local Plan Core Strategy (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The National Planning Policy Framework (NPPF) sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

Development on this site should meet the requirements of Core Policy CS14, where the Council expects new housing development to provide a range of dwelling types and sizes, taking into account the existing character of the area.

Core Policy CS15 requires that all new housing will be developed at a density which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration, new residential development within the urban area will be expected to achieve a minimum density of 40 dwellings per hectare. It is clear that whilst Policy CS15 (LPCS) seeks to achieve this minimum density, this should not be at the expense of compromising the character of the surrounding area.

This site has an area of approximately 99m². 1 dwellinghouses in this area would equate to approximately 101 dwellinghouses per hectare which would be substantially over the target minimum density. This would suggest the proposed scheme would result in overdevelopment of the site. However, this should also be visually assessed as to whether it would be in character with the surrounding area, along with all other considerations.

It also states that permission should be refused for development for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

In this instance, the proposed bungalow would have a larger footprint than most in the area (with the exception of recently built dwellinghouse 26a St Georges Crescent). Yet it would have a smaller plot size, with a density significantly over and above that required by Core Policy CS15. It would not meet the required external space standards and would result in a visibly cramped and overdeveloped site. There is an existing street pattern which this building would not follow as it would be located in a residential rear garden. It would be beside a garage (although it is noted that these garage are visually different from the elevations provided as noted on site.) and would front the track which runs to the rear. No other properties have front elevations facing this track, which only serves to provide rear garden access and some associated residential garage.

The proposed dwelling house would be an incongruent form of development, creating a bungalow, in an area of predominantly two-storey dwellinghouses, unaligned with the established build line. Despite its small size, it would result in overdevelopment of a small plot, which would appear cramped without

appropriate external amenity space. The predominant issue is that the plot is too small to provide appropriate living accommodation.

On balance, the proposed development would **NOT** comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 130 of the NPPF (2023) in terms of design, character and appearance.

Amenity of Future Occupiers

Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy 2014 requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines'

To ensure that adequate living space is provided for future residents, the units need to meet the national technical standards (Nationally Described Space Standards) and the GBC Residential Layout Guidelines.

	Proposed Bungalow (m²)	Minimum Space Standards (m²)
Double Bedroom	12.7	11.2
Bathroom & WC	3	3.6
Living Room	35 (including Kitchen/diner)	13.2
Kitchen/Diner	35 (including Living Room)	12

For a 1 bedroom house, there is a minimum garden area required of 37.2m² and garden depth of 7.6m. The rear garden depth would be between 1.8m and 4.2m with an area of 19m². This falls significantly below the minimum external space standards, and is another indicator of overdevelopment of this space.

It is also noted that the scheme would reduce the external garden area of 24 St Georges Crescent to 66m² and 8 metres depth. The number of bedrooms is unknown but if the bedrooms are 4 or greater, the scheme would also fail with regards to retaining appropriate external amenity standards for the existing dwellinghouse.

As such the proposal would **NOT** safeguard the amenity of future occupiers in compliance with Policy CS19 (LPCS) as well as Section 12 of the NPPF

Neighbouring Amenity

In considering any proposals for development it is important to ensure that it does not cause demonstrable harm to the amenity of any existing residents or property such that it will materially harm their living conditions. Policies seeking to protect amenity and ensure acceptable future living conditions are included in the Local Plan Core Strategy.

Core Policy CS19 requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land.

The NPPF also assists and seeks to ensure developments will function well, do not undermine quality of life and create attractive and comfortable places to live, work and visit and seeks to "secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings".

The application site is surrounded by residential properties. It would adjoin the following properties; 24 St Georges Crescent to the South, the South West, 26 St Georges Crescent to 28 St Georges Crescent to the south east and 26 St David's Crescent to the east.

Given the location of the proposed bungalow in the rear garden of no.24 and its distance from the main dwellinghouses of these properties, the scheme would be unlikely to impact the residential amenity of these

neighbours in terms of position and overbearing bulk. In terms of overlook, the proposal would result in ground floor windows only due to the single storey nature of the building. It is noted that the proposed floor plans show only 2 rear facing windows, but the elevations show 3 rear facing windows. This would need to be clarified if the recommendation is to approve.

SPG2 on residential layout guidelines clearly states that a minimum distance for facing windows to habitable rooms where there is a private garden area within the "field of view" a minimum privacy distance of 26 metres between windows would apply. In this instance the proposal fails this requirement for windows facing south toward 24 St Georges Crescent's rear elevation. Whilst to the south these would directly face, no. 24, the impact of these could be overcome with appropriate boundary treatment. Boundary treatment details have not been provided. The boundary treatment details could be reserved by condition. However, it is noted that there is existing fencing sub-dividing the rear part of this garden from 24 St Georges Crescent as shown in the below image taken during the site visit.



The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014, subject to details reserved by condition.

Parking and Highway Issues

The proposed development needs to be considered against Gravesham Local Plan Core Strategy Policy CS11 which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities.

The GBC Highways Officer has provided comments on the scheme. They have advised that it should provide a space for vehicular parking and a space for cycle storage. This scheme offers no cycle storage and, the space for vehicular parking as shown on the plans, would not meet the minimum 2.7m width

requirement. As such, the scheme would not provide adequate cycle and vehicular parking spaces.

The GBC Highways Officer also raised practical concerns regarding the safety of utilising the unlit track during dark hours, and that the scheme does not meet building control requirements for access width.

Therefore, the proposed development would **NOT** comply with the provisions of Policy T11 of the Gravesham Local Plan Core Strategy September 2014 and saved Policies P3 and P5 of the Gravesham Local Plan First Review 1994 and Section 9 (Promoting Sustainable Transport) of the NPPF.

Refuse Storage

Detail on the waste storage provision is required including where the bins will be placed for collection and how they will be moved from the bin store to the collection point. Whilst position of refuse is shown fronting the dwellinghouse, the details provided do not show where the bins will be placed for collection. This is particularly a concern given that the front of the dwelling would face onto a narrow, unlit track which would not be suitable for refuse vehicles. This detail could be reserved by condition.



Conclusion & Recommendation

The recommendation is to refuse the planning application for the following reasons:

1. The proposed development by reason of its incongruent design, cramped appearance and overdevelopment of a small plot would result in significant harm to the character of this area and would as a result fail to comply with the requirements of the Householder Alterations/Extensions Guide, Policy CS15 and CS19 (Development and Design Principles) of the Core Strategy 2014 and paragraph 130 of the National Planning Policy Framework (2023) in terms of design, character and

appearance.

2. The proposal fails to provide high quality amenity space and will result in poor living standards for future occupants and as such would be contrary to Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy 2014 which states that new development shall be designed and constructed to safeguard the amenity of its occupants and paragraph 130 of the National Planning Policy Framework (2023) and SPG2 Residential Layout Guidelines (2020).
3. The proposed development by reason of its inability to demonstrate adequate level of on site vehicle and cycle parking provision, resulting in harmful impact to highway safety and failing to take opportunity to improve active travel accessibility, would as result be contrary to paragraphs 110 to 113 of the National Planning Policy Framework (2023), Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

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

Case Officer:	Ms Lisa Williams	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	8th December 2023	Dated:	11th December 2023