

Delegated Report

Full Planning Application

Planning Application No: 20211211

Location: 173 Singlewell Road Gravesend Kent DA11 7QA

Description: Demolition of existing side and rear extensions, erection of a new single storey rear extension, insertion of dormer windows to rear elevation, erection of a detached garage and two storey side and rear extension to create an additional 4 bedroom dwelling.

Applicant: Mr M Peckover

Submitted Documents/Plans

Application Form Dated 20 September 2021

Design and Access Statement Dated 20 September 2021

Drawing no. D-01 Revision B (Site Location Plan, Existing Floorplans, Elevations and Section)

Drawing no. D-02 Revision C (Proposed Floorplans, Elevations, Section and Block Plan)

Drawing no. D-03 Revision A (Existing and Proposed Street Elevations)

Relevant Planning History

There is no relevant planning history for no. 173 Singlewell Road. However reference will be made throughout the report to previous decisions along Singlewell Road, the details of which are provided below;

- **20180021** – 155 Singlewell Road - erection of a two storey three bedroom attached dwelling, erection of a single storey extension to existing dwelling and erection of detached double garage – **Allowed on Appeal 05 November 2018**
- **19940233** – 157 Singlewell Road - erection of two storey side and rear extension incorporating a front porch to form wc, study, breakfast room, enlarged kitchen and enlarged lounge with bedroom and en-suite bathroom, enlarged bathroom and enlarged bedroom over. **Permitted 15 November 1994**
- **19980208** – 137 Singlewell Road - erection of two storey side and rear extension to form lounge, enlarged kitchen, utility room and w.c. with two bedrooms, an ensuite w.c./shower room, an enlarged bathroom and a playroom in the proposed roof space. **Permitted 11 August 1998**

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport

- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- P5 – Change of Use of Buildings and Vehicle Parking Standards
- T1 – Impact on Development of the Highway Network

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 11 – Making effective use of land (paragraph 124)
- 12 – Achieving sustainable development and well-designed places

Supplementary Planning Guidance

- 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards: Nationally Described Space Standards (October 2015); and
- SPG 4 - KCC Parking Standards (2006)

Consultations, Publicity and Representations

GBC Highways Officer

I do not consider the proposed parking layout viable. The proposed space behind the existing property seems to be difficult if not impossible to access. The vehicle would have to approach parallel to the parking space and not perpendicular to easily access it. The parking space behind the proposed property has a potentially convoluted but not impossible manoeuvre.

In terms of car parking, it would be better to turn it through 90° so it is perpendicular to the carriageway. This is then less intrusive in the garden and considerably eases access. The width of the carriage crossover would have to be widened to accommodate the new parking layout and a 2m x 2m pedestrian visibility splay provided adjacent to the drive on the side nearest the buildings, no improvement being required on the opposite side as this is an existing situation. The gates would need to be removed.

In addition provision for the secure storage of 4 cycles would be required for the new dwelling, whilst the existing dwelling would require one secure parking space to meet the requirements of the supplementary planning guidance in KCC SPG4 of one cycle space per bedroom which has been adopted by Gravesham Borough Council.

GBC Waste & Recycling Manager

No comment received.

Natural England

No objection subject to securing appropriate mitigation.

KCC Heritage

The site lies within an area of multi-period archaeological potential. However, it is considered unlikely that these proposals will have a significant below-ground archaeological impact and have no further comments to make in this case.

DSE Comments (summarised)

- The design approach is flawed as it would see the side extension appear as an additional building in the street with the same architectural language and prominence of the existing house.
- The application does not clearly show how the proposal responds to the existing character and streetscene.
- The existing building turns the corner well and provides a well-articulated and attractive southern frontage onto Dennis Road. The bay windows on this façade also provide a passive surveillance to the street. The proposal would present a large, bland wall with very little fenestration or articulation. This would reduce the quality of the streetscene on Dennis Road and the quality of experience in the public realm.
- Having the entrance to the side extension paired with the existing front door is out of character in this context and does not traditionally appear elsewhere in the streetscene.
- The gap between the side extension and the fence along Dennis Road would be very narrow, creating an unusable and unattractive space.
- The bulk and footprint needs to be reduced.
- There is concern over quality of internal spaces within the existing house.
- The box bay window would sit uncomfortably as it does not match the canted bay of the existing building.
- The off-street car parking space to the rear of no.173 appears very tight and would be challenging to enter and exit.

Ward Councillors

The Councillors for the Woodlands Ward were consulted as part of the application one concerns were raised from one Councillor who expressed their concerns about the application.

Neighbouring properties

Six surrounding properties were consulted as part of the application and there were 11 contributors to the application in total, with three letters of support, and eight objecting. The consultation period expired on 23 November 2021. It is important to note that within the 11 contributors there are following up comments from the same contributors with additional information and comments provide.

The reasons of support are summarised below but it is important to note that these letters of support are not from residents within close proximity to the proposal;

- have lived on Singlewell for many years and feel need to uplift the road and bring new housing to this area.
- pass this road every day and the garden currently is an eye-sore. Support knocking it down and rebuilding a new home to make the street more presentable.
- am a regular visitor to this road and this house is in much need of work. Therefore support these works.

The objections to the proposal are summarised below, with the non-material planning considerations highlighted for clarity;

- Devalue surrounding properties by turning a semi-detached property into a terrace property
- There is an WW2 air raid shelter in the garden which should be protected, possibly even listed
- The property is located on a dangerous junction with mange accidents and the additional dwelling will exacerbate the current situation
- The land title has restrictive covenants stating that only one dwelling is allowed on each plot

- Damage to party wall and mature trees of adjacent properties
- Proposal would forever change the setting and character of the area
- Would result in a corridor effect similar to which has happen at The Fairway due to loss of space on the corner
- Loss of mature trees and hedging in the garden of 173 Singlewell Road – impact on wildlife
- Parking arrangement impact adjacent garden areas in terms of amenity
- The proposed garage is too large

Officer's Analysis

173 Singlewell Road benefits from a comparatively generous side garden area varying in width between 4.9 and 6.1 metres. The proposal is for the subdivision of the side garden area for the erection of a two storey attached property, a single storey rear extension and two rear dormers to the host dwelling, and the erection of a detached garage in the rear garden. The proposed works would result in one additional dwelling with the creation of two, four bedroom properties.

Principle of Development

The Local Plan Core Strategy Policy CS02 (Scale and Distribution of Development) priorities development in the urban area as a sustainable location for development by bringing forward a range of suitable sites in other parts of the urban area for residential. The application site lies within the urban area of Gravesend and is not subject to any specific local planning policies or constraints that restrict the principle of development, other than general policies that seek to protect the character of the area and the amenity of existing and future residents.

The proposal does however propose the subdivision of an existing residential plot. In this respect there are no specific local planning policies which prohibit this form of development in either the Local Plan Core Strategy 2014 or those saved policies from the Local Plan First Review. It is noted at a national level the NPPF 2021 seeks to address the issue of garden grabbing in paragraph 71 and states 'plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area'.

It is considered that local adopted policies CS14 (Housing Type and Design), CS15 (Housing Density), and CS19 (Development and Design Principles) together provide an assessment framework in line with the guidance provided by paragraph 71 of the NPPF. The proposal shall be assessed against these policies in the following section reviewing the character and appearance of the scheme.

Housing Delivery

Given Gravesend's current inability to demonstrate a 5 year housing land supply (a 3.27 year supply has most recently been calculated within the statement published [here](#)), and 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:

- "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
- 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 Gravesend 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 176)
- 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 63); 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 123(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 proposed development for a net increase of '1' residential units would offer a minimal but important contribution towards meeting this local need and, accordingly, officers considers that this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the NPPF (2021) 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, as per the policies outlined in the principle of development section above.

Character and Appearance

The proposal stands to be assessed in accordance with Paragraph 71 of the National Planning Policy Framework and Policy CS14 (Housing Type and Design) and Policy CS15 (Housing Density) which both require new development to take into account the existing character of the area and to ensure that the density of new housing development does not compromise the distinctive character of the area in which it is situated. This is also addressed in paragraph 124 of the NPPF whereby 'planning decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change'.

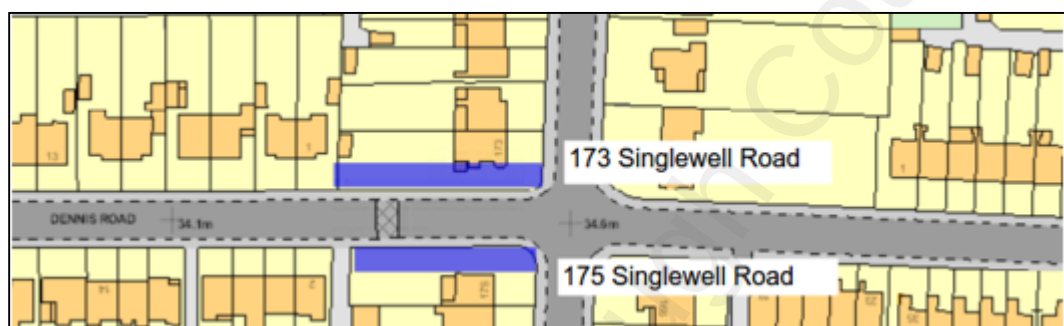
In addition Policy CS19 (Development and Design Principles) provides that new development will also be visually attractive, fit for purpose and locally distinctive, and should conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area.

The proposal is for the subdivision of the side garden area of 173 Singlewell Road to construct a two storey four bedroom dwelling. 173 is a two storey semi-detached property in use as a single dwelling;



It is situated on a corner plot fronting onto Singlewell Road with Dennis Road running parallel with the side of the property. Due to the property being positioned on a corner plot, it benefits from a generous side garden area. The property has modest rear extensions, which will be demolished as part of the application and replaced with a rear extension. The side garden area varies between 4.9 and 6.1 metres in width. There are two feature bay windows on the flank elevation of the property which will be lost as part of the

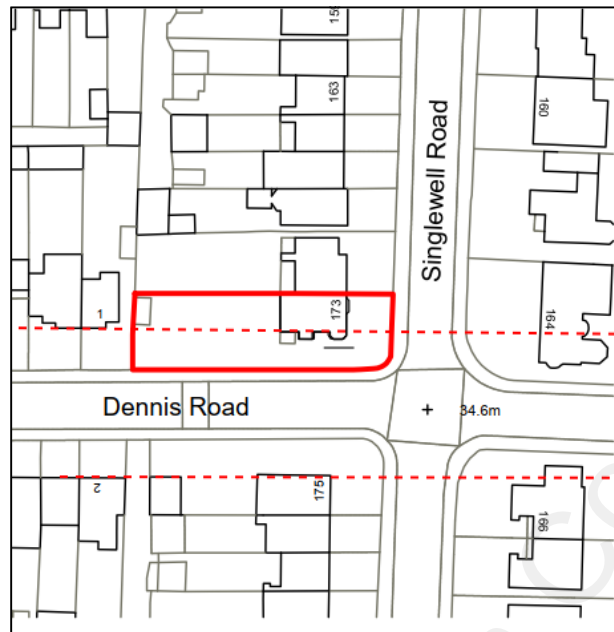
application. The corner location results in the property being very prominent which is further emphasised by the elevated position of the property above the level of the highway due to the topography of Singlewell Road decreasing to the north. Although the property is bounded by close boarded fencing and established hedging to the side, it is not excessive in height. There is a clear distinctive open character created from providing such a generous side garden area and it is an important characteristic which should be safeguarded, particularly in an urban environment with high density of development. Due to the properties on the west side of Singlewell Road being predominantly terraced dwellings, the gaps in the street scene are limited. The consistent form of built development is generally only interrupted by the gaps from the arterial roads from Singlewell Road and the generous side garden areas. Some of the side garden areas have been reduced, with the construction of a two storey side extension, and one new dwelling (no. 155 Singlewell Road) but this does not detract from the importance of the openness of the street scene. As can be seen from the map extract below, the application site and the property on the opposite side of Dennis Road maintain their respective large side garden areas;



This retains the clear and regular built form of development in this immediate area and is a key characteristic which should be safeguarded.

The Council acknowledges that no. 137 and 157 Singlewell Road have two storey side extensions which disrupt this open character, but these are historic decisions dating from 1998 for 137 Singlewell Road and 1994 for 157 Singlewell Road. It is important to note that these examples did not result in the subdivision of the existing plot, but added additional accommodation for existing dwellings. The appeal decision at 155 Singlewell Road (appendix 1) is the only example of a new dwelling being created in the side garden area. The map extract above only focusses on the west side of Singlewell Road and there is a similar character on the east side of Singlewell Road which is equally as important, despite the style of dwellings being different. Side garden areas also exist for the corner properties on Lingfield Road and Ascot Road further establishing the open character and importance of corner plots.

The site location plan submitted with the application has been annotated to show a clear building line which links the dwellings of Singlewell Road with Dennis Road. The dashed line below shows the existing line of development and it is clear to see how an development over that line within breach this fundamental design feature of the area.



Allowing a new built form of development in this location is considered to further erode the original open design of the corner to the detriment of the character and appearance of the area, while also resulting in the reducing of an important visual break in the street scene. The applicant has submitted a contextual plan, but it does not include the property on the opposite side of Dennis Road, no. 175 Singlewell Road which also retains its side garden area. As the image below shows, the currently balance open character of the this section of Singlewell Road will be detrimentally compromised with the subdivision of 173 Singlewell Road and the creation of an additional dwelling;



Based on the above information it is clear that the creation of a new dwelling in the side garden area of 173 Singlewell Road will compromise the distinctive open character of the area in which it is situated, while failing to take into account the desirability of maintained the areas prevailing and significant open character and setting.

The original layout of the properties on Singlewell Road comparable to the host dwelling, retained open corners as a deliberate means for creating a clear distinction between the urban form, the open frontage and side gardens. Whilst historical permissions and a recent planning appeal have eroded this layout, this has been to detriment of the local area and has harmed the spacious quality of the area and the rhythm in

the street pattern.

In addition, previous decisions have resulted in proposals that have been in scale with their respective host dwellings and not as bulky as this proposal, which is of irregular proportions relative to the surrounding dwellings and would detract from the openness of the garden in its current form.

The proposal would result in the inappropriate subdivision of a residential garden and the creation of a new dwelling on a prominent corner location. Due to the size, design and bulk of the proposed two storey dwelling beyond the side elevation of 173 Singlewell Road the proposal would result in the erosion of an important open corner to the detriment of the character and appearance of the site and wider street scene. This is contrary to Policies 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. The proposal is also contrary to paragraph 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.

Design Massing and Bulk

As well as the loss of the open character, the design of the proposed extension fails to conserve the character of the local built environment. Regardless of the use of the proposed side addition, it is important that two storey side additions are designed to be subservient to the host property so not to detract from the original character of the property. This is usually achieved by ensuring the width of the side addition is not disproportionate to the host dwelling, setting the front elevation of the addition back behind the existing front elevation and ensuring the ridge height of the additional is lower than the existing dwelling. As well as protecting the character of the existing property, it also helps to keep the bulk of the addition to a minimum.

The proposed side addition is 5.4 metres wide and the host dwelling is 6.2 metres wide. The proposed side addition is therefore only 0.8 metres smaller in width than 173 Singlewell Road itself. This results in an addition that is excessively bulky when compared to the surrounding properties with two storey extensions that are considerably smaller in width;



157 Singlewell Road



137 Singlewell Road

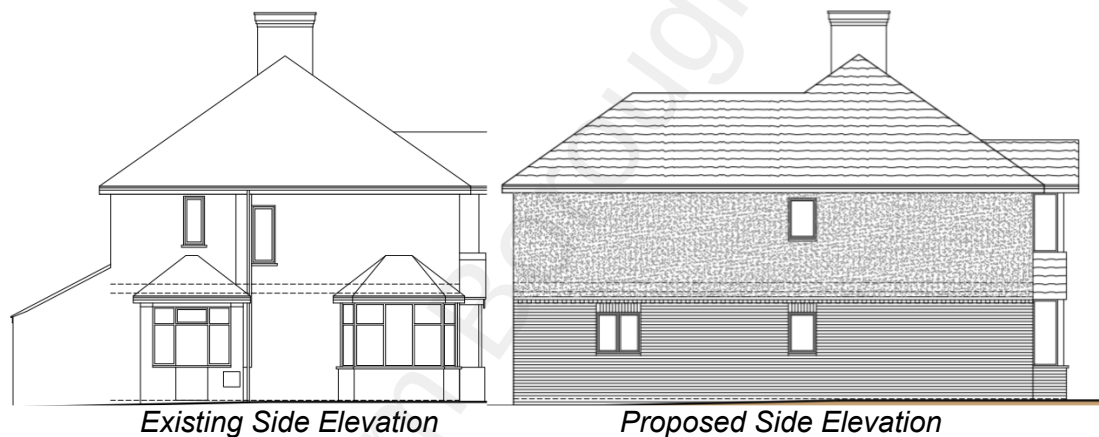
The proposed addition will be constructed within 700mm of the site boundary and it clear that the side existing side extension in the vicinity are set in from the boundary by a greater distance which helps to preserve the open character.

The ridge line of the side extension has been designed as a continuation of the existing dwelling and there is no set back behind the front elevation of the host dwelling. As the context plans provide with the application clearly show, not attempt has been made to design a subservient extension;



This is considered even more important given the semi-detached nature of the property. The subserviently design side extension helpfully exists on the adjoining property no. 171 Singlewell Road which is both set down, set back and modest in width. The proposed completely alters the appearance of the pair of semi-detached dwellings creating a row of terraced dwellings the pattern as outline above is a central terrace flank by a pair of semi-detached dwellings.

The proposed addition also protrudes past the rear elevation of the existing dwelling by 4.1 metres at two storeys in height, resulting in the addition appearing even more disproportionate, further worsened by the proximity of the extension to the corner;



The concerns regarding the design of the extension have been supported following the LPA seeking advice from a Design South East design panel. The comments have been outlined earlier in the report, but support the above assessment in terms of the design approach being flawed as it would see the side extension as an additional building in the street with the same architectural language and prominence of the existing house. It should appear as a secondary building. The frontage facing onto Dennis Road is poor and very plain by comparison of the existing dwelling which has attractive bay features.

The size, scale and massing of the proposed dwelling appears to be too large, bulky and over dominating in this particular location. The proposed dwelling would overpower the existing properties in terms of its visual impact. Council Policy CS19 Development and Design Principles section 5.15.14 states the following;

“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. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site, including strategic views and site topography.”

Overall it is considered that the bulk, massing, scale and size of the proposed dwelling would over-dominate the site and this adds to the overall concern that the development would be harmful to the character and appearance of the existing surrounding area and it therefore not compliant with policy CS19 of the Core Strategy. The proposal is also contrary to Section 12 of the NPPF which requires that design should function well and add to the overall quality of the area and is visually attractive. Furthermore it states

permission should be refused 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.

By comparison it is considered important to reference the appeal decision at 155 Singlewell Road reference 20180021 (appendix 1). While the principle of the proposal is the same in terms of the creation of a dwelling in the side garden area, the current proposal is much larger. The proposed addition for this current application is 12.64 metres deep, whereas the dwelling approved at 155 Singlewell Road was only 10.5 metres deep. The approved dwelling was set back with less fenestration details on the front elevation so not to compete with or undermine the host property. As already mentioned there is nothing subservient about the current proposal, and the design features replicate and subsequently compete with the host dwelling adding excessive bulk the host property. It is for that reason the approved scheme at 155 Singlewell Road is not directly comparable to the current proposal.

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'. On 25 March 2015 the Government issues a written ministerial statement which introduced new technical housing standards in England and set out how these would be applied through planning policy which came into effect on 01 October 2015. From this date, existing Local Plan policies need to be interpreted with reference to the nearest equivalent national technical standard.

The proposed development needs to provide adequate living conditions for future occupiers which is reinforced by the Council's Residential Layout Guidelines. These guidelines provide the minimum sizes for rooms and amenity spaces, which are compared to the National Described Space Standards (see table below);

Room	Proposed Dwelling (m ²)	Existing Dwelling (m ²)	GBC Residential Layout Guidelines (m ²)	National Described Space Standards (m ²)
Lounge	13.38	15.8	13.2	-
Kitchen/diner/family room	35.1	35	-	-
Bed 1	14.8	14.5	11.2 (double)	-
Bed 2	13	12.9	11.2 (double)	-
Bed 3	7.5	4.98	7.5 (single)	-
Bed 4	7.8	11.98	7.5 (single)	-
Bathroom	3.6	5.6	3.6	-
Gross internal floor area (4b/6p)	124.31	153.31	-	106

The proposed dwelling and the host property are adequately sized in compliance with the relevant guidelines and will provide suitable units of accommodation. Although the 3rd bedroom of the existing dwelling is undersized, this is its current size and it would be unreasonable for the Council to object to this. The 4th bedroom of the host dwellings is newly being created in the loft space and so difficult to ascertain the usable floor area so it is likely to be smaller than the figure suggests.

The Council's Residential Layout Guidelines provide dimensions in relation to external amenity space. Four bedroom properties should have a minimum garden area of 100m² and a minimum depth of 10m. It is important to ensure that the proposed dwelling has adequate amenity space, but also that sufficient space remains for the host dwelling which is essentially having its garden area halved. The application also includes the erection of a double garage at the rear of the garden which further reduces the size of the amenity space. The depth of both of the gardens from the rear of the dwelling to the rear of the garage is 10 metres which is satisfactory. The remaining garden for the host dwelling is 73m² and the garden area for

the proposed dwelling is 67m². The application would result in substandard garden amenity space of four bedroom dwellings. This is another key difference from the dwelling approved at 155 Singlewell Road which only resulted in two three bedroom properties.

There are no issues of privacy for future occupants of either dwelling. Due to the proposed dwelling extending past the rear elevation of the host dwelling, there is the potential for overshadowing. Fortunately the closest window of 173 Singlewell Road to the proposed dwelling is a bathroom and therefore classified as a non-habitable window. The closest habitable window serving bedroom two is far enough away from the extension not to suffer from any loss of light. The proposed two storey extension will not affect the ground floor rooms as a single storey rear extension is proposed for 173 Singlewell Road to match the depth of the proposed dwelling. The proposed development safeguards the amenity of future occupiers in terms of privacy, sunlight and daylight in accordance with Policy CS19 of the Local Plan Core Strategy 2014.

Nonetheless, the proposal is contrary to Policy CS19 of the Local Plan Core Strategy 2014 and the Residential Layout Guidelines by virtue of providing substandard garden amenity space.

Neighbouring Amenity

Policy CS19 (Development and Design Principles) requires amongst other things that new development safeguards the amenity of occupants of neighbouring properties, in regards to privacy, daylight and sunlight and it should avoid adverse environmental impacts from pollution, including pollution, noise and light.

It is not considered that the proposed development will affect any of the neighbouring properties in terms of overshadowing. The impact on the host dwelling has already been assessed. 171 Singlewell Road is far enough away from the proposal not to be affected. The properties to the front and rear are also far enough away from the proposal.

The proposed development safeguards neighbour amenity in terms of privacy. The existing dwellings opposite the application site are in excess of 30 metres away. There are no habitable windows on the flank elevation of the proposed dwelling to result in any loss of privacy. Although the proposed dwelling protrudes past the building line of 1 Dennis Road, the properties are at a 90 degree angle to each other and there is no direct overlooking.

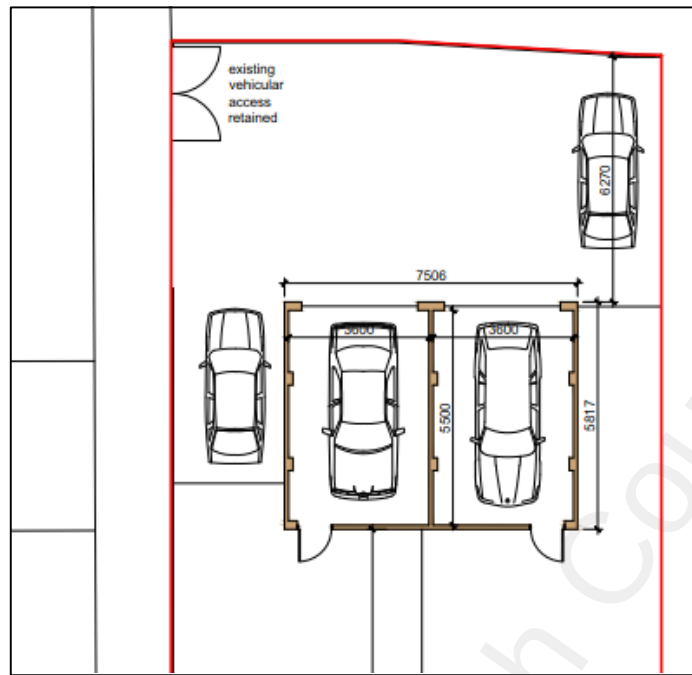
A significant number of objections have been received in relation to the application, but they do not relate to issues of loss of privacy or overshadowing relating to the extension. Concerns have been raised in relation to the garage and these will be explored in the next section of the report. The neighbour representations will be further addressed at the end of the report.

The proposed extension will not result in any issues of overlooking or loss of light to the neighbouring properties and as such the proposal safeguards neighbour amenity in accordance with Policy CS19 of the Local Plan Core Strategy 2018.

Effects of Highway Safety/Parking Provision

The scheme as submitted needs to be considered against policies T1, P3 and P5 of the Gravesham Local Plan First Review 1994 and Policy CS11 of the Gravesham Core Strategy. These policies ensure that development has an acceptable amount of parking and is not detrimental to the highway network.

The existing parking arrangement for 173 Singlewell Road is to the rear of the property and consist of a driveway with a detached single garage. This arrangement is perpendicular to the highway. There is no parking to the front of the property. The proposal results in the demolition of the existing garage and erection of a replacement double garage to serve both the existing and proposed dwelling. The proposed garage is 7.5 metres wide and 5.8 metres deep. It is designed with a pitched roof and is 4m in height. The parking arrangement will be accessed via the existing access on Dennis Road. The garage forms the parking provision of both dwellings with a second space for each property;



While a similar arrangement was approved by the Planning Inspectorate under reference 20180021, the key difference here is that there was also an access way at the bottom of the garden serving numerous other properties in Singlewell Road. This is not the case with this application. The rear garden of 173 Singlewell Road backs directly onto the side boundary of 1 Dennis Road. The access is therefore considered more restrictive and difficult to manoeuvre in satisfactorily.

GBCs Highway Engineer has stated that the parking layout is not appropriate. With the space serving the existing dwelling in front of the garage, it will not be possible to manoeuvre into the space due to the parallel positioning to the highway. It would be more appropriate to have parking arrangement perpendicular to the highway as currently exists for the property. It is therefore considered that the current parking arrangement is not satisfactory due to the constrained space and complicated parking manoeuvres required to access the allocated spaces resulting in them likely to be underused and leading to unacceptable additional on street parking in the area, contrary to Policy CS11 of the Gravesham Local Plan Core Strategy 2014 and saved Policy P5 of the Local Plan First Review 1994.

There is no objection to the principle of the proposed double garage. However, it is a large structure, whilst it is not unusual to have outbuilding/garages located at the rear of the gardens in this area the scale and bulk of this structure are of concern, but it is not considered that the garage will detrimentally affect the amenity of the adjacent neighbouring properties.

Concerns have also been raised from numerous local residents about the impact of the additional dwelling on an already busy and reportedly dangerous junction with Singlewell Road and Dennis Road. It is not considered that the additional one dwelling in this location will significantly or detrimentally worsen the situation. As already established there is an existing parking arrangement for 173 Singlewell Road and the access is in excess of 10 metres from the junction as required by KCC Highways and Transportation. For this reason it is not considered that the proposal will result in a highway safety issue at the junction with Singlewell Road and Dennis Road.

The proposed parking arrangement is unsatisfactory due to the constrained space and complicated parking manoeuvres required to access the allocated spaces resulting in them likely to be underused and leading to unacceptable additional on street parking in the area, contrary to Policy CS11 of the Gravesham Local Plan Core Strategy 2014 and saved Policy P5 of the Local Plan First Review 1994.

Other Material Planning Considerations

Ecology and Biodiversity - 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 Council has decided to impose a tariff on new housing development. Developers will need to pay £253.83 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 applicants have not paid towards the mitigation.

The proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development fails to comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 180 and 181) of the National Planning Policy Framework 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Neighbour representations – As summarised earlier in the report, a number of neighbour representations have been received. Many have been explored throughout the assessment of the application but there are some which for clarity will be expanded upon below;

- Damage to neighbour property – this is dealt with under The Party Wall Act and is not a material planning consideration. Further explanation regarding this can be found via the following link <https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls>.
- Property prices are not material planning considerations. Further information regarding material planning considerations can be found here <https://www.gov.uk/guidance/determining-a-planning-application>

Air Raid Shelter – Local residents have raised concerns regarding the presence of an air raid shelter within the garden of the host dwelling and queried its historical significance. The Air Raid Shelter is not listed by Historic England, nor does it fall within a Conservation Area or near listed buildings. However, the air raid shelter has to be considered as a non—designated heritage, as set out in Para. 203 of the NPPF (2021), the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Military sites are both offensive and defensive: they include fortifications designed to withstand assaults, and bases from which operations could be launched. To these the 20th century added buildings designed to protect civilians from various forms of air-attack. Some structures are unique; other types, particularly in the 20th century, were constructed using standard designs, methods of construction and materials. These buildings and structures help to represent the importance of the armed forces to the history of our society. They may be stand-alone structures (such as former air raid shelters or anti-aircraft gun placements) or be within larger military sites such as airfields.

Historic England's Conservation Principles Policies and Guidance (Historic England, 2008), sets out four values that can be used as a framework for describing elements of interest that contribute to significance. These are: Evidential; Historical; Aesthetic and Communal.

- Evidential: this value is about the potential of a place to reveal evidence of past human activity;
- Historical: this value considers how past people, events and aspects of life are connected to a place;

- Aesthetic: this value explores how people draw sensory and intellectual interest from a place;
- Communal: this value is about the meanings of a place for people who relate to it and have experience or memory of it.

Listing Selection Guides provide supplementary information to support the statutory listing guidance, and set out criteria for specific types of building for deciding whether they should be listed. They therefore provide some indication of what is considered to be significant in buildings of the various types of building covered by the Selection Guides. History England's listing selection guide of relevance to the air raid shelters is therefore

Historic England, Military Structures-Listing Selection Guides, 2011 (2017 edition).

For the period 1914-45 three main strands of development were:

- The rise of military aviation and related buildings;
- The move away from permanent quarters and permanent fortification; and
- The home front, and the threat from aerial bombing

Air shelters come into the third category, under 'Civilian Structures' (page 16 of the Selection Guide). It states that First World War air raid shelters were rare and warrant serious consideration for listing and that much greater discretion is required over WWII examples which are fairly common. The guidance states that from the later 1930s all new factories were obliged to have purpose-built air raid shelters, so their survival is not unusual.

The applicant has not submitted any information regarding the presence of an air raid shelter to the Council, were the application to have been considered positively, further information regarding this potential non-heritage asset would have been sought and the matter considered in light of the information provided by Historic England, as set out above.

Conclusion

Following a thorough assessment of the application and all material planning considerations relating to the proposal, it is considered that the application cannot be supported and that planning permission be refused.

The proposal would deliver a suitably located dwelling to the local housing stock and would boost the supply of dwellings in the Borough. This would generate both social and economic benefits, with economic benefits accrued through the construction phase and subsequently, through the reliance of future occupiers on local facilities and services. These benefits are attributed minor weight, however, they do not sufficiently outweigh the harms identified in his report, which are summarised below.

The proposal would result in the inappropriate subdivision of a residential garden and the creation of a new dwelling on a prominent corner location. Due to the size, design and bulk of the proposed two storey dwelling beyond the side elevation of 173 Singlewell Road the proposal would result in the erosion of an important open corner to the detriment of the character and appearance of the site and wider street scene. This is contrary to Policies 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. The proposal is also contrary to paragraph 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.

The proposal would also result in substandard private amenity space for the proposed dwelling, as well as the host property, falling short of the Gravesham Residential Layout Guidelines (SPG2) (2020) in terms of minimum garden area for four bedroom dwellings and therefore will not offer sufficient space for future occupiers, contrary to Policy CS19 (Development and Design Principles) of Gravesham's Local Plan: Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2021).

The proposed parking arrangement is unsatisfactory due to the constrained space and complicated parking manoeuvres required to access the allocated spaces resulting in them likely to be underused and leading to

unacceptable additional on street parking in the area, contrary to Policy CS11 of the Gravesham Local Plan Core Strategy 2014 and saved Policy P5 of the Local Plan First Review 1994.

The proposal fails to safeguard biodiversity and fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment. Therefore, the development fails to comply with the requirements of the Habitat Regulations, Section 15 (specifically paragraphs 180 and 181) of the National Planning Policy Framework (2021) and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).

Recommendation

Refusal

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

Team Leader:	Miss Faye Hobbs	Service Manager:	Mr Shazad Ghani
Signed:		Signed:	S. Ghani
Dated:	13th December 2021	Dated:	13/12/2021