

Gravesham Borough Council

Pre Application Response Letter

Reference	PRE20250036
Site	54 Britannia Drive, Gravesend
Proposed Development	Sub-divide plot with the host property and erect a 3-bedroom detached dwelling (replacing existing double-garage)
Case Officer	Gary Edwards
Date of Advice	7 th July 2025

I am writing with reference to your request for pre-application advice at the above site.

You have requested advice relating to your proposal to sub-divide the plot with the host property and erect a three-bedroom detached dwelling. I have now had a chance to look at the proposal in more detail and can offer the following comments:

Site Description

The site lies on the northern side of Britannia Drive. It comprises a two storey, semi-detached dwelling located within a development of similarly designed properties. It is located on a larger plot than other dwellings in the immediate areas and benefits from a garage to the side. The site is defined on the Policies Map of the Gravesham Local Plan Core Strategy as lying within the urban area.

Proposal

Your proposal involves the demolition of the existing garage and the construction of a two-storey, detached dwelling. This would accommodate three bedrooms.

The proposed development is set out in more detail in the following documents and drawings which accompany your submission:

- Title deeds
- HM Land Registry location plan (Figure 1)
- Annotated aerial view of the site from Google Maps (Figure 2)
- Section expanded and modified from HM Land Registry location plan (Figure 3)
- Section expanded and modified from HM Registry Location Plan (Figure 4)
- Current layout of 54 Britannia Drive (Figure 5)
- Floor plans for 54 Britannia Drive (Figure 6)
- Photographs of 54 Britannia Drive (Figure 7)
- Figure legends and descriptions
- Section expanded and modified from HM Land Registry location plan (Figure 1)
- Section expanded and modified from HM Land Registry location plan showing proposed plot division (Figure 2)
- Plot plan showing the sub-division of the site (Figure 3)

- Example plan and aspects of a 3 bedroom house that would suit a 6m wide plot (Figure 4).
- Proposed example floor layouts (Figure 5)
- Composite pictures of 54 Britannia Drive showing the new detached dwelling (Figure 6)
- Images from Google Streetview providing views along Britannia Drive (Figure 7)
- Figure legends and descriptions

Relevant Planning History

There is no relevant planning history to this site

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Where there are other material considerations the development plan should be the starting point, and other material considerations should be taken into account reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014; and
- Saved policies in the Gravesham Local Plan First Review, November 1994.

The relevant policies for your proposal are as follows:

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density
- Policy CS18 – Climate Change
- Policy CS19 – Design and Development Principles

Saved Policies in the Gravesham Local Plan First Review 1994.

- P3 - Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network

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 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

Other Material Considerations

Supplementary Planning Guidance and other Documents

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents. Development Briefs and Conservation and Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/home/planning-and-building/supplementary-planning-guidance/supplementary-planning-guidance>

The following documents are relevant to the consideration of this enquiry:

- SPG4 – KCC Parking Standards (2006).
- Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020.
- Householder Extensions/Alterations Design Guide (2021).
- Technical Housing Standards – nationally described space standard (2015).
- Design for Gravesham (2024).

Officer's Analysis

The main planning considerations relating to this proposal are:

1. Housing need
2. Principle of development
3. Design, character, and appearance
4. Impact on residential amenity
5. Highway issues
6. Cycle and refuse storage
7. Ecology and biodiversity
8. Biodiversity net gain

These issues are assessed below:

Housing need

Hopkins Homes Ltd v Secretary of State for Communities and Local Government (2017) 1 W.L.R. 1865, Lord Camwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Camwath as part of the Supreme Court decision stated.

It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than “guidance” and as such a “material consideration” for the purposes of section 70(2) of the 1990 Act.. it cannot.

And does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort the statutory scheme.

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing and supply statement in March 2023. It demonstrates that based on data up to the period 2022-2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council's currently 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 Gravesham's Local Plan Core Strategy (LPCS), (2014), Policy CS02 must be regarded to be 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:

- the application of policies in this Framework that protect areas or assets of particular importance provides a strong 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, 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.

In the Gravesham context, the policies referred to in paragraph 11(d) (i) are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in paragraph 189) 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 the Heritage Coast, irreplaceable habitats, designated heritage assets (and other heritage assets of
- 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, 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.

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 NPPF and established local planning policy taken as a whole.

Principle of development

The broad principle of the proposed residential development finds support in the NPPF. Paragraph 61 is particularly relevant.

To support the Government's objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet

an area's identified housing need, including with an appropriate mix of housing types for the local community.

In addition, paragraph 73 requires that in order to promote the development of a good mix of sites local planning authorities should, inter alia, "support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.

The application site is defined on the Policies Map of the Gravesham Local Plan Core Strategy as lying within the urban area. Policy CS02 of the Core Strategy "priorities development in the urban area as a sustainable location for development"

In light of these considerations, there is no objection to the broad principle of residential development subject to the proposal being appropriate in terms of other planning issues.

Design, character and appearance

At a national level good design is one of the central requirements of the NPPF:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (paragraph 131)

The aims sets out in paragraph 131 of the NPPF are reflected in Policy CS19 of the Council's Core Strategy. This requires new development to be "visually attractive, fit for purpose and locally distinctive" and to "conserve and enhance the character of the local built, historic and natural environment". It also requires new development to "integrate well with the surrounding local area". In addition, Policy CS19 requires the following:

... 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. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings.

Design for Gravesham (2024) expands on the Core Strategy, and Policy CS19 in particular to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

This locality has a very distinct character which comprises semi-detached dwellings located on similar sized plots. In addition, there is a broad uniformity in terms of the spaces between dwellings. The proposed development would differ from this character in the following ways.

- The proposed dwelling would be sited in close proximity to the existing property at 54 Britannia Drive. The space between these properties would be limited and would not reflect the wider spacing between dwellings that is characteristic of the locality.
- The width of the proposed dwelling would be narrower than the existing property. The width of the existing dwelling measures 6m whereas the width of the proposed dwelling would be 5.3m.
- The proposed dwelling would compromise a detached property whereas the immediate locality is characterised by semi-detached properties.

As a result of the loss of the existing garage and driveway, replacement on-site parking would need to be provided for the existing dwelling. In addition, on-site parking would need to be provided for the proposed dwelling. This would involve providing a significant area of hardstanding to the front of each property.

Paragraph 10.21 of the Council's Householder Extensions/Alterations Design Guide Supplementary Planning Document (2021) relates to front gardens and parking. This document contains the following useful image which confirms the requirement that paving over a significant amount of the forecourt should be provided in all spaces not specifically defined as parking or turning spaces.



From the information provided it is not clear whether this requirement would be met. Any future planning application would need to demonstrate that the proposed hardstanding would be proportionate the size of the dwelling it serves and provision should be made to soft landscaping to mitigate the impact of this element of the proposal.

At this stage full details of the proposed scheme, including details of the external appearance of the proposed dwelling, have not been provided although it is noted that a photograph of the dwelling at 6 Rycroft has been submitted to illustrate the type of property that could be accommodated on the site.

If it is decided to pursue a planning application it will be important to ensure that the proposed new dwelling is of a good quality which reflects the general appearance, scale and height of the existing dwelling at 54 Britannia Drive as well as the character of the immediate locality. In addition, the use of similar materials would also be expected. You may therefore wish to engage the services of a good quality architect. It would be particularly useful for the application to be accompanied by a well prepared Design and Access Statement which justifies the design and appearance of the proposal given that it will differ from the existing uniform character of the area. This justification should make detailed reference to the

requirements of existing development plan policy as well as any other material planning considerations. It would then be possible to fully assess your proposals in light of this information.

Impact on residential amenity

Paragraph 135 of the NPPF requires planning decisions to, inter alia, provide 'a high standard of amenity for existing and future users'. In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to 'safeguard the amenity, including privacy, daylight and sunlight of its occupants of those of neighbouring properties and land.

As the main aspect of the windows, within the proposed dwelling is likely to be towards the front of the property and towards the rear garden area, it is unlikely that there would any significant impacts in terms of window to window overlooking or loss of privacy to neighbouring private amenity areas.

Furthermore, due to the anticipated design, scale, location and orientation of the proposed dwelling it would be unlikely to result in a significant loss of sunlight/daylight or outlook to the occupiers of neighbouring properties.

Notwithstanding these comments, these issues would need to be more closely assessed in light of the detailed drawings accompanying any future planning application.

Internal space standards

The "Technical housing standards – nationally described space standard" was published to the Department for Communities and Local Government in March 2015. This document sets out requirements for the gross internal area of new dwellings in a defined level of occupancy as well as floor areas and dimensions for key plans of the home.

Assuming that the internal layout of the proposed dwelling is similar than that of No 6 Ryecroft (as shown on the submitted "Example plan and aspects of a 3 bedroom house that would suit a 6m wide plot (Figure 4), the new dwelling would comprise a two storey three bedroom, four or five person unit. The required minimum gross internal floor area for such units would be 84m² (for a four person unit) Or 93m² (for a five person unit).

It will be important to ensure that the proposed dwelling meets these minimum standards. In addition, the proposed dwelling would be required to meet the minimum standards to room sizes as set out in the Council's adopted Residential Layout Guidelines.

Amenity Space

The Gravesham Residential Layout Guidelines require a minimum garden area of 60m² for a property with three bedrooms and a minimum depth from the rear wall of the house of 10m. It would appear that the proposed new dwelling would meet these requirements.

Highway Issues

Policy CS11 of the Core Strategy seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is providing in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. Saved Policy P3 of the Gravesham Local Plan First Review requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards. These standards require a maximum of two parking spaces for each three-bedroom unit.

Any formal planning application would therefore need to demonstrate that two on-site car parking spaces could be provided for the proposed new dwelling. In addition, two on-site car parking spaces would need to be provided for the existing dwelling to replace those lost as a result of the provision of the new dwelling.

Cycle and refuse storage

The current Kent County Council Vehicle Parking Standards provide minimum cycle parking standards. For residential dwellings there is a requirement of one space per bedroom. As such provision for a total of three cycles would be required.

Suitable storage for waste and recycling would also need to be provided. A copy of the Council's planning guidance in waste collection requirements can be viewed via the following link:

[Planning guidance on Waste Collection Requirements](#)

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 have decided to impose a tariff on new dwellings within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. Developers will need to pay £328.27 per dwelling. The money raised will be used to pay for schemes to avoid the adverse impacts of new development on the birds. More information can be found on the Council's website via the following link:

[Thames Estuary and Marshes Nature conservation and landscape – Gravesham Borough Council](#)

The applicant would need to contribute towards strategic mitigation measures within Specific Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development would fail to comply with the requirements of the Habitat Regulations and Section 15 of the NPPF and Policy CS12 of the Core Strategy Biodiversity net gain.

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ("net gain") on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as "biodiversity net gain" in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. The increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. Where an applicant believes the development would be subject to biodiversity gain condition, the application must be accompanied by minimum information set out in Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, the proposed earlier date and the reasons for proposing that date.
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date) that result in loss of onsite biodiversity value (“degradation”) and where they have:
- a statement to the effect that these activities have been carried out
- the date immediately before these activities were carried out
- the pre-development biodiversity value of the onsite habitat on the date
- the completed metric calculation tool showing the calculations, and
- any available support evidence of this:
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exist on the date of application (or an earlier date); and
- plans(s) drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Further information on biodiversity net gain is available via the following link:

Biodiversity net gain – GOV.UK (www.gov.uk)

It would appear that the proposed development would be subject to the biodiversity gain condition and therefore any planning application would need to be accompanied by the information set out above.

Summary

In summary, and as set out in this report, there are a number of concerns with the development and its impact on the uniform character of this locality. These concerns would need to be fully addressed in any future application. As such, you may wish to ensure that a good quality architect is engaged to design the scheme and that any application is accompanied by a comprehensive Design and Access Statement which seeks to justify this proposal in terms of existing development plan policy. The Council would then consider your proposal in light of this information.

Next Steps

If planning permission is sought, an application can be made through the Planning Portal.

<https://www.planningportal.co.uk/applications>

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at:

[Validation checklist/Guidance for planning applications – Gravesham Borough Council](#)

Prior to submitting a planning application, you may wish to engage the services of planning agent;

<https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website:

<https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application-service>

You are advised that PRE20250036 is now closed.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.