



Delegated Report

Full Planning Application

Planning Application No: 20250844

Location: The Foresters Arms, 150 Parrock Street, Gravesend, Kent, DA12 1ER

Description: Erection of a second floor extension to form a new flat

Applicant: Mr and Mrs Thandi

Submitted Documents/Plans

Application form
Planning Statement
Site Location Plan
Plan no 102 Plans and Elevations As Existing
Plan no 102 Plans and Elevations As Proposed
Plan no 104 Block Plans As Existing and As Proposed

Relevant Planning History

Reference	Description	Decision	Decision Date
19830723	Erection of single storey rear extension	Permitted	28/11/83

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure

- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

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

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan First Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision- Making
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and Enhancing the Natural Environment
- Section 16 – Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 2 – Residential Layout Guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Waste and Recycling

Received on 07.08.25

I have concerns that there is no waste storage detailed on the plans for the extension or the current flat.

GBC Environmental Protection

Received on 08.09.2025

There is no objection to this application. The existing flat on the first floor will act as a buffer for any noise coming from the pub. Having checked our records, we haven't had any noise complaints regarding the pub, so loud music etc doesn't appear to be an issue here.

It is recommended that a Construction Environmental Management Plan is submitted due to the location and lack of on- site storage for materials, equipment etc.

GBC Conservation Officer
(from the pre application enquiry)

The building should not be extended by more than one storey and should be finished with a parapet roof to replicate the existing first floor. Historic pictures of the pub show the original fenestration and casement windows. These should be replicated.

Neighbouring properties

15 no. surrounding properties were consulted and a site notice was posted on 16th September 2025. The overall expiry date was 7th October 2025.

One letter of support has been received, stating that the author is happy for the project to proceed. However, the built- in Carrington pub sign must be incorporated in the corner of the new flats as it is vital that this piece of local street heritage is retained. Some green tiles should be incorporated in the overall design.

Officer's Analysis



Site Description

The site comprises a two storey flat roofed building in a prominent location at the junction of Parrock Street and Edwin Street in Gravesend. It contains a public house at ground floor level and a flat at first floor level. The site is near, but not within, the King Street Conservation Area (which extends from the north down to 165 Parrock Street (around 50m to the north of the application site).

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath re- emphasised 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 the starting point for decision- making is the development plan. Lord Carnwath, 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 a 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 land 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 current inability to demonstrate a 5 year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham’s Local Plan Core Strategy (LPCS) (2014), Policy CS02 must be regarded as being out of date, as required by 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 the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well- designed places and providing affordable homes, individually or in combination.

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

- Habitats Sites (and those listed in NPPF paragraph 189)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- National Landscape
- Irreplaceable habitats
- Designated heritage assets (and other heritage assets of archaeological interest, see NPPF footnote 75)
- 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 130(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 would provide an additional two bed flat. This would make a minimal contribution towards meeting this local housing need and, accordingly, officers consider this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the development plan and the NPPF (2024) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create a high standard of amenity for existing and future occupiers.

Location

The application site is located within the urban area of Gravesend. Policy CS02 (Scale and Distribution of Development) identifies that in such areas, development will be supported. As a First Tier Settlement, Gravesend is on the highest tier of sustainable locations in the borough.

4.2.4 The Council has carried out an assessment of the facilities and services available in the Borough's settlements to identify which are more sustainable. The results are reflected in the settlement hierarchy below.

Table 2: Settlement Hierarchy

First Tier Settlements:	Gravesend/Northfleet/Ebbsfleet, i.e. the urban area
Second Tier Settlements:	Istead Rise, Hook Green Meopham, Higham
Third Tier Settlements:	Culverstone Green, Meopham Green, Vigo
Fourth Tier Settlements:	Cobham, Shorne, Sole Street
Other Settlements:	Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway, Three Crutches

Source: Settlement Hierarchy Technical Paper December 2009

The Council's Settlement Strategy

It is therefore considered that the location of the proposed development is a sustainable one, particularly given its proximity to Gravesend Railway Station and a number of bus routes along Parrock Street and the surrounding roads. Locationally, the development would be acceptable in principle. However, all other matters also need to be considered.

Principle of the Development

The broad principle of residential development of adding another storey and flat to this property finds support in the NPPF (2024). Paragraph 61 of the document states;

"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 the 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 (d) 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 is within the urban area of Gravesend. Policy CS02 (LPCS) "prioritises development in the urban area as a sustainable location for development".

Area Policy 2 states;

"In the area shown on the Proposal Map, proposals which continue to provide small low overhead premises for shops and non- office services will be acceptable in principle along the frontage of Parrock Street, provided they do not adversely affect residential properties or traffic conditions along Parrock Street. Offices will generally be acceptable on upper floors but will be resisted at ground floor level, unless there is a serious decline in the use of shopping premises in this area".

As the proposal will not involve any loss of shopping at ground floor level, the principle of building an additional floor for residential purposes is considered acceptable.

Policy CS10 (LPCS) relates to physical and social infrastructure and states that support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure or lead to the provision of additional infrastructure that improves community well-being. In this instance, it could be argued that the provision of the additional accommodation would support the future of the public house

(which is a community asset). No objections are raised in terms of Policy CS10, therefore.

Policy CS14 (LPCS) requires new housing development to provide a range of dwelling sizes, taking into account the character of the area. One 2 bedroom flat would be provided which would be in keeping with the overall form of development in the vicinity of the site. No objections are raised in terms of Policy CS14, therefore.

Policy CS15 (LPCS) relates to density; it is not considered that the provision of an additional flat would increase the density of development on the site to the point that it would be out of character with the area. No objections are raised in terms of Policy CS15, therefore.

The principle of the development is accordingly considered to be acceptable, subject to the proposal being appropriate in terms of all other planning issues.

Design, Character and Appearance

Policy CS19 (LPSC) states new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti- crime standards. The Design Guide SPD (2024) requires development to protect the residential amenity of neighbours and to enhance the local built environment. The Design Guide (2024) states development must positively respond to Gravesham's diverse identities and distinct characteristics of the surrounding areas. Development must engage, enhance and celebrate the surrounding environment and community. Development must enrich and reinforce local identity. Good design is promoted by the NPPF (2024).

Policy CS20 (LPCS) supports proposals that preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the assets and their interpretation and enjoyment, especially where these contribute to the distinct identity of the borough. In terms of non- designated heritage assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset. This policy is supported by paragraphs 135, 207, 210 and 216 of the NPPF (2024).

The application site comprises a two storey building with a single storey flat roofed rear projection, in a prominent location in the street scene. It is considered to be a non- designated heritage asset due to its age and history. The proposal is to add another floor and a first floor rear extension to the building following the demolition of the existing chimney. The additional floor would incorporate another flat while the first floor extension would facilitate access to this flat by providing a landing for the extended staircase to the flat. The flat would be two bedroom with a kitchen/ dining area, a living room and a bathroom and a separate WC, all served by a hallway. Both the additional floor and the extension would be flat roofed without a parapet wall.

The property was the subject of a pre- application enquiry though this was for an additional two storeys involving two flats, not an additional single storey involving a single flat.

The proposal would be around 350mm higher than the adjacent building at 151 Parrock Street. Raising the height of the building by 2.5m, it would have a significant impact upon the character and appearance of this non- designated heritage asset and the street scene. While the proposed extension would use matching materials of construction, it would nevertheless appear as a large, bulky and incongruous addition to the property and the street scene, an impact which would be exacerbated by the prominence of the site when viewed along Parrock Street (from both directions) and from along Edwin Street. While it would not be significantly higher than the building at 151 Parrock Street, it would tower above the dwellings along Edwin Street, which are traditional two storey with basement terraces. Moreover, the proposed windows in the extension would not match the original windows in terms of glazing bars. Particularly in views from the northern end of Edwin Street, the proposed extension and the resulting building would have a harmful impact upon the street scene. The proposal would fail to preserve the character of the local built environment and would fail to integrate well with the surrounding local area. The proposed development is therefore contrary to Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy, the guidance in the Design for Gravesham – Design Guide (2024) and the National Planning Policy Framework (2024).

Given the distance between the application site and the King Street Conservation Area, it is not considered that the proposed extension would have a harmful impact upon the setting of the Conservation Area, however.

It is not considered that the loss of the chimney from the existing building would have a harmful impact upon its character or appearance, or the street scene.

Amenity of Future Occupiers

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users of a site. The impact on amenity is also considered with regard to the criteria in Policy CS19 (LPSC), which states that new development should be located, designed and constructed to safeguard the amenity, privacy, sunlight and daylight of its occupants and those of the neighbouring properties and land. The impact upon neighbours will be assessed in the next section of this report.

The following table compares the internal spaces proposed against the minimum space standards contained in the Council's Residential Layout Guidance SPD (2020).

Room Type	Proposed Internal Floor Area (sqm)	Minimum Space Standard (sqm)
Kitchen/ dining room	11.0	12.0
Living room	13.4	13.2
Bathroom and WC	6.5	3.6
Double Bedroom	13.3	11.2
Single Bedroom	10.9	6.5

The above table demonstrates that the proposed flat would fail to comply with the minimum space standards contained in the Council's Residential Layout Guidance (2020), in that the kitchen/ dining room would be one sqm below the required standard. The flat would however, equal the standard for a one storey, two bedroom, three person dwelling as contained in the national standards. Each room in the proposed flat would have a window, providing a suitable outlook for its future occupiers.

Neighbouring Amenity

It is important that any new development safeguards the amenity of the neighbouring occupiers in accordance with the requirements of Policy CS19 (LPCS), the Council's Supplementary Planning Documents and the NPPF (2024).

The property most likely to be affected by the proposed development is the existing flat on the site, through potential noise disturbance. However, the use of modern insulation in the flat is such that this impact would be very limited and would not be harmful. It is not considered that the proposed development would have a harmful impact upon the surrounding properties through overlooking due to the distances involved.

However, the proposed extension would infringe the 25 degree rule of the Council's Residential Layout Guidelines SPD (2020). A line drawn from the mid- point of the lowest window opposite the application site (in this case, a basement window) would be bisected by the proposed additional floor to the building at 150 Parrock Street. While the application site is to the west/ north- west of the adjacent properties along Edwin Street, the extent to which the line would be cut is quite significant. It is considered that this would result in overshadowing of and a loss of light and outlook for, the dwellings at 51- 53 Edwin Street. The proposed development is therefore contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), the guidance contained in the Council's Residential Layout Guidelines Supplementary Planning Document (2020) and the National Planning Policy Framework (2024).

The amenities of the occupiers of the other nearby and surrounding properties would not be harmed by the proposed development as a result on the distances involved.

Parking, Highways and Refuse

The proposal is for a 1 x two bed flat. Kent County Council Parking Standards stipulate that a two bd flat have one parking space to comply with the standards. However, the site is located in a town centre location and the NPPF (2024) promotes the provision of new development in sustainable locations with a lower level of or no provision of parking in order to encourage of a move away from the private car as a means of transport. In this case, it is considered appropriate and acceptable to allow the development without parking, given the above considerations.

Kent County Council's Cycle Parking Standards require once space per bedroom, in residential developments – two spaces for this proposal. However, no spaces would be provided. Therefore, while the lack of car parking is considered to be acceptable, the lack of cycle parking is not, particularly in the absence of car parking for the development.

Inadequate cycle parking provision would therefore be provided on the site, contrary to Section 9 of the NPPF, Saved Policy P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Local Plan Core Strategy 2014.

It is noted that there is no dedicated refuse storage space in the development and this is considered to be a shortfall in the proposal. The proposed development is therefore contrary to the guidance contained in the Council's Supplementary Planning Document 2 - Residential Layout Guidance (June 2020).

Ecology and Biodiversity

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/ or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site).

Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site.

The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites. The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £337.49 per dwelling). This approach is approved by Natural England for all new residential developments. For every planning application for a new dwelling (including new flats) which does not require any other contributions to be secured through a s106 legal agreement or unilateral undertaking the tariff has been secured through a contribution agreement. The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However a more recent Court of Justice European Union (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between "the plan or project" itself and "measures intended to avoid or reduce the harmful effects of a plan or project on a European site". This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

The proposed development would result in an increase in the number of flats on the site of one, and

accordingly, there would be a requirement for a payment of the SAMMS tariff. However, no such payment has been made and the proposal and there is no manner in which to secure the payment without a signed agreement. The proposal is therefore contrary to the Council's Supplementary Planning Guidance 2 Biodiversity Conservation (2006) and the National Planning Policy Framework (2024).

Biodiversity Net Gain

Under the Environment Act 2021 and supporting statutory instruments, Biodiversity Net Gain (BNG) is mandatory for most development. The legislation requires a minimum 10% gain in biodiversity from acceptable development, either on- site, off- site or a combination of both. BNG provided under the mandatory requirements off- site and significant BNG on- site must be secured by a legal agreement for 30 years under an approved Habitat Management and Monitoring Plan.

There are strict requirements in terms of what an application must contain in relation to BNG before it can be accepted as valid, as set out in Schedule 7A (Biodiversity Net Gain in England) of the Town and Country Planning Act 1990. This requires a completed metric calculation tool showing the calculations of the pre-development biodiversity value of the on- site habitats on the date of the application, and other information.

However, there are a number of exemptions from the BNG regulations;

- householder development, as defined in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015;
- development granted planning permission by a development order under section 59. This includes permitted development rights;
- development subject to the de minimis exemption – development that does not impact a priority habitat and impacts less than 25 sqm of habitat, or 5m of a linear habitat such as a hedgerow;
- self- build and custom- build development – development that comprises
 - no more than nine dwellings; and
 - is carried out on a site that is no larger than 0.5 hectares in size; and
 - consists exclusively of dwellings which are self- build or custom- build, as defined in section 1(A1) of the Self Build and Custom Housebuilding Act 2015.

The applicant states that it is to be exempt from the biodiversity net gain regulations as it would be below the threshold. As the flat is on top of an existing building it is agreed to be exempt from BNG.

Conclusion

The proposed development is considered acceptable in principle as it would involve an acceptable increase in the intensity of use of the site, in this urban area. However, there are a number of issues with the proposal which render it unacceptable. It would have an adverse impact upon the character and appearance of this non- designated heritage asset and the street scene, would fail to provide cycle parking space and refuse storage space, would provide a flat with a sub- standard sized kitchen/ dining room, would harm the amenities of the occupiers of 51 and 53 Edwin Street, would fail to secure a contribution under the SAMMS tariff scheme.

The proposed development is therefore contrary to the requirements of the Design for Gravesham – Design Guide (2024), the guidance contained in the Council's Residential Layout Guidelines Supplementary Planning Document (2020), the Council's Supplementary Planning Guidance 2 Biodiversity Conservation (2006), Saved Policy P3 of the Gravesham Local Plan First Review (1994), Policies CS11, CS19 and CS20 of the Local Plan Core Strategy (2014), the National Planning Policy Framework (2024) and the Biodiversity Net Gain Regulations (2024).

Recommendation

The recommendation is to refuse this application.

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

Case Officer:	Mr Tom Gabriel	Team Leader:	Richard Hart
Signed:	TM Gabriel	Signed:	<i>R Hart</i>
Dated:	20 October 2025	Dated:	20th October 2025