



Delegated Report

Householder Planning Application

Application No: 20240880

Location: 62 Wrotham Road, Gravesend, Kent, DA11 0QF

Description: Use of existing forecourt for the off-street parking of two cars.

Applicant: Mr Naeem Karim, Simple Solutions Ltd

Site Visit: N/A Desktop Assessment

Submitted Documents/Plans

- Application Form – dated 23 October 2024;
- Planning, Design and Access, and Heritage Asset Statement – by Ward+Associates (September 2024);
- Drawing no. 1522.WD.02F – Site Location and Block Plans as Existing and Proposed.

Relevant Planning History

Reference	Description	Decision	Decision Date
20230296	Application for Listed Building Consent for the proposed single storey rear extension and internal alterations.	PERMITTED	25.05.2023
20230295	Erection of a single storey rear extension and internal alterations.	PERMITTED	25.05.2023
20221161	Application for Listed Building Consent for the erection of a single store rear extension with internal alterations.	REFUSED	21.12.2022
20221160	Erection of a single store rear extension with internal alterations.	REFUSED	21.12.2022
20080177	Application for Listed Building Consent for the demolition of the boundary wall between 60 and 62.	PERMITTED	21.04.2008

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & 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
- T2 – Primary and District Road Network
- T5 – Access to the Identified Highway Network
- TC2 – Listed Buildings
- TC3 – Development Affecting Conservation Areas

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

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

Other Planning Policy Considerations

The Council has a statutory requirement under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant listed building consent for any works to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The Council also has a statutory requirement under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

The National Planning Policy Framework (NPPF) (2024) is national policy in the conservation and enhancement of the historic environment, which must be taken into account by the Council together with the related guidance given in the Planning Practice Guidance (PPG).

The Council must have regard to its development plan where material in considering whether to grant listed building consent for any works.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 9 – Promoting Sustainable Transport
- 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 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

Other Relevant Guidance

- Manual for Streets 2 (2007)
- Kent County Council Dropped Kerb Guidance and Self-Assessment (2023)
- Gravesham Driveway Dropped Kerb Guidance (Informal Guidance) (2023)
- Gravesham Front Driveway Design Guidance (Informal Guidance) (2023)

Consultations, Publicity and Representations

External Consultees

Kent County Council Highways – A new access is proposed from the A227, Wrotham Road, which is subject to a 30mph speed limit, as such visibility splays of 2.4m x 43m are required in both directions with no obstruction within the visibility splays over 1.05m above carriageway level. The applicant also needs to demonstrate that any land crossed by the visibility splays is within their control, or that of Kent County Council.

In addition, pedestrian visibility splays of 2m x 2m behind the footway on both sides of the access, with no obstructions over 0.6m above footway level, should also be provided.

Vehicle and pedestrian visibility splays should be shown on a revised plan.

Please note that all street lamp columns and utility plant needs to be situated at least 1.5m from the location of the top of the ramped kerb of the proposed crossover. Any street furniture, lamp columns and utility plant within 1.5m must be relocated at the expense of the applicant.

Internal Consultees

GBC Conservation Officer – No comment received.

Local Ward Councillors – No comment received.

Neighbouring properties

An advert was published in the Gravesend Messenger and a notice displayed on site.

In addition, twenty-five surrounding properties were consulted and no representations were received.

The consultation period expired 24 January 2025.

Preliminary Matters

The site is subject to an Enforcement Notice (dated 7 June 1993) which required the unauthorised vehicular access to be stopped up. The Enforcement Notice was upheld on appeal on the 1 February 1994 and subsequently complied with on the 6 December 1994.

According to records, the fixed railings and pedestrian gate was installed, with the remaining wall being in situ. The arrangement was as the image below (Google Streetview May 2018).



At some point before May 2019, the fixed railings were removed along with part of the front boundary wall and the frontage was used informally for parking.

Gravesham's Planning Enforcement Team were made aware of the condition of the building and informal parking following the grant of permission for a rear extension (refs. 20230295 / 20230296) and the frontage has since been returned to the condition imposed by the Enforcement Notice.

Officer's Analysis

Site Description

62 Wrotham Road is a Grade II Listed Building located on the eastern side of the highway, but is not within a Conservation Area. The property forms one of a pair of semi-detached Listed Buildings.

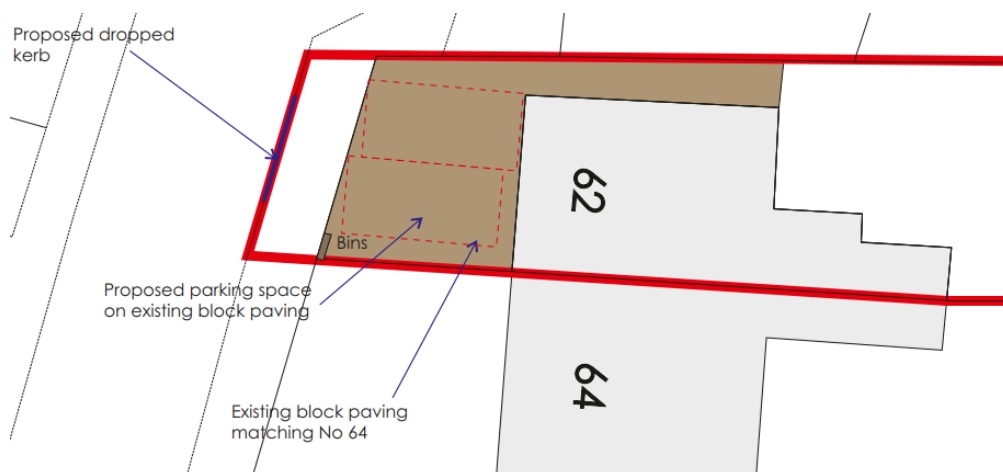


The listing description for the property is as follows:

Early C19. 3 storeys and basement brown brick. Stuccoed ground floor. Parapet with stone coping. 5 sashes in all with glazing bars intact. First floor has 2 round-headed sashes. Doorcases have curved pediments and pilasters. Nos 62 to 70 (even) form a group. (Nos 66 to 70 (even) are local interest buildings).

Proposed Development

This application proposes the installation of a dropped kerb for use of the forecourt for vehicular parking. The plans demonstrate the frontage would accommodate 2no. vehicles parked adjacent to each other, with a dropped kerb spanning a width of 3.6m.



Principle of the Development

The site is located on Wrotham Road is a Classified Highway and a busy arterial road into and out of the town centre. Therefore, the installation of a dropped kerb requires planning permission.

It is important to note that the frontage was used as an informal parking space, without the benefit of a dropped kerb for approx. 3 years, as demonstrated in the image below (Google Streetview – November 2022).



Gravesham's planning enforcement team investigated the informal parking and following discussions the front boundary wall and railings were reintroduced in 2024.



Design and Impact on Listed Buildings and Conservation Area

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 (LPCS) reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The NPPF (2024) also places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 216). This is echoed in Policy CS20 (LPCS), which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 of the Local Plan 1994 sets out that for development affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building, and whether the character or appearance of the listed building will suffer as a result. Proposals must be sympathetic in terms of their appearance and materials.

Saved Policy TC3 of the Local Plan 1994 also states that development is expected to make a positive contribution to the conservation area. As the application site lies within the King Street Conservation Area, in close proximity to Listed Buildings, these policies are all relevant to the consideration of this application.

Whilst it is recognised that development which makes effective use of land should be supported (paragraph 124 of the NPPF (2024), this comes with the proviso that it should safeguard and improve the environment and not conflict with other policies in the NPPF (2024). Relevant to this proposal, paragraph 129 of the NPPF (2024) which states that developments that makes efficient use of land should be supported, taking into account the identified need for different types of housing, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed places.

The proposed development will utilize the existing hard-paved frontage for parking, with the new railings and part of the front boundary wall to be removed. The front boundary wall has little significance to the historic quality of the Listed Building by virtue of it already being partially demolished and rebuilt, and as such the proposed development is not considered to impact on the significance of the Listed Building. Therefore, the proposal is acceptable in relation to Policies CS19 and CS20 (LPCS) as well as Saved

Policy TC3 and Section 16 of the NPPF (2024).

Amenity of Future Occupiers

The proposal will safeguard the amenity of future occupiers in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Neighbouring Amenity

There will be no impact on the amenity of adjoining properties in terms of loss of light, overlooking, sense of enclosure or loss of outlook. As such the proposal is considered to safeguard the amenity of adjoining properties in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Parking and Highways

Paragraph 116 of the NPPF (2024) indicates that development should only be prevented or refused if there would be an unacceptable impact on highway safety and paragraph 117 of the NPPF (2024) advises that applications for development should, amongst other things, create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

Policy CS11 (Transport) (LPCS) sets out that new developments should mitigate their impact on the highway. Saved Policy T5 of the Gravesham Local Plan First Review (1994) indicates that the formation of new accesses to classified roads will not normally be permitted except where no danger would arise.

It is recognised that many older properties situated along classified roads have no on-site parking provision and therefore residents are forced to park their vehicle on the road, sometimes a considerable distance from their properties. However, any new access must comply with local and national policy and highway guidance to ensure safe access arrangements.

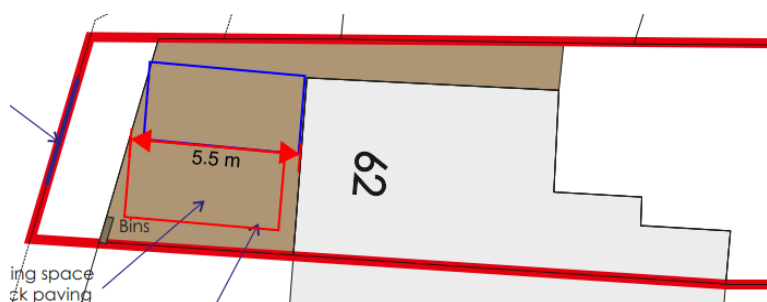
The Council's former vehicle access guidance note (PGN6) set out a number of criteria for new accesses onto Class A classified highways, which included the following:

- there should be a minimum depth of 5metres - to ensure a car can be parked wholly off the road;
- visibility splays should be provided appropriate to the class of road and the speed of passing traffic;
- excessive gradients should be avoided;
- the access should not create a hazard by virtue of its close proximity to other entrances, road junctions, pedestrian crossings and traffic islands;
- in conservation areas and in the grounds of listed buildings, there will be a presumption against paving over the entire forecourt for the benefit of parking. New proposals should seek to retain at least half of the garden as soft landscaping;
- where an alternative means of vehicle access can be provided which does not affect the main road, a new access to the classified road will normally be refused;
- all applications will be expected to show on-site turning space - typically, this will require a minimum forecourt area of 7.5 metres width and 8 metres depth;
- exceptional circumstances will be needed to justify the creation of more than one means of access to a single residential property;
- all new entrances will have to have full sight-lines appropriate to the speed of passing traffic and all reasonable steps should be taken to design out any hazards arising from this access. This may entail further work in the highway.

As PGN6 is now superseded only limited weight can be attached to the criteria, however the requirements should be considered as guidelines for safe accesses onto 30mph Class A highways. Notwithstanding

PGN6, Manual for Streets 2 (2007) and Kent County Council's (KCC) Dropped Kerb Guidance and Self-Assessment (DKG) (2023) set out requirements of footway/pedestrian visibility sightlines of 2m x 2m uninterrupted to a height of 0.6m, and carriageway/vehicular visibility of 2.4m x 43m on a 30mph road.

The proposed driveway would accommodate two vehicles, with a width of 6.6m and a minimum depth of 5m. KCCs DKG requires a minimum depth of 4.8m and width of 2.4m for perpendicular parking space, however the depth requirement increases to 6m when the space is in front of an access door or garage. The southern space (shown in red below), is in front of the entrance to the property and has a depth of 5.5m. Therefore, the driveway fails to accord with standards and would either impede entrance into the property or result in vehicles overhanging the footway.



Due to the width of the site, it would not be possible to manoeuvre a vehicle on site and exit in a forward gear. Therefore, vehicles would have to reverse over the footway to park on or egress from the driveway, where visibility would be obscured by adjacent boundary treatment and soft landscaping to the south (no. 64 Wrotham Road). To the north, visibility of the carriageway would be obstructed by vehicles parked on-street parking within the parking bays to the front of Wrotham Court. Therefore, the proposed driveway cannot meet KCCs DKG 2.4m x 43m visibility splay requirement, as confirmed in KCC Highways response. Moreover, the lack of onsite manoeuvrability would mean vehicles would block the pavement waiting until the carriageway is clear, and would cause interruption to the free flow of traffic on a busy, local distributor road, and pedestrians using the footway. This is also outside the ownership of site and so cannot be controlled.

Further to the driveway not providing adequate vehicular visibility, there are concerns with poor pedestrian visibility. As referenced previously, vehicular visibility is interrupted to the north and south, which is also the case for pedestrian visibility. KCC DKG requires pedestrian visibility splays of 2m x 2m with no obstruction over a height of 0.6m, which is not achieved for the two parking spaces proposed. The northern side of the driveway has visibility due to the railings, however the southern boundary has a wall at an approx. height of 1m and would exceed the 0.6m height requirement which has been confirmed as a requirement by KCC Highways. This is vital for the proposed access due to the site being within approx. 36m of Wrotham Road Primary School, and the footway is used by parents and children regularly when walking to the school.

It is acknowledged that in some instances conditions can be attached to applications to ensure that visibility splays are met. However in this case the southern splay pass over the land of neighbouring properties, and therefore no planning condition could control the visibility splays being impeded landscaping or boundary treatments on the neighbours land. As such, this is not a viable fall-back position to address the visibility and the driveway represents a risk to vehicular and pedestrian safety contrary to Policy CS11 (LPCS) and saved policies T1 and T5 of Gravesham's Local Plan First Review (1994).

Precedent and other Accesses

Whilst each planning application is treated on its own merits, consideration needs to be taken of any planning history or the existence of any similar development locally.

The nearest accesses on Wrotham Road to the application site is the adjoining neighbour, no. 64/66 Wrotham Road. The access for no.64 was granted permission for an access in 1985 (ref. 19850791). A later application (ref. 20000720) for an access serving no.66, utilising the frontage of no.64 for manoeuvring was refused and dismissed on appeal (ref. APP/K2230/A/01/106094).

Notwithstanding the refused application for a joint vehicular access and parking area (ref. 20000720), the adjoining property no.64 benefits from a larger forecourt and has sufficient space to manoeuvre vehicles to enter and egress in a forward gear (see image below). As such, the historic 1985 (ref. 19850791) access was granted permission and is not precedent for an access on the application site.



There are no other properties within the immediate vicinity of the application site with crossovers, with the exception of Wrotham Court. However this is a flatted development with an undercroft access to rear parking. The access is recessed from the highway and set-behind parking bays. As such, this is also considered to be materially different to the proposal.

Conclusion

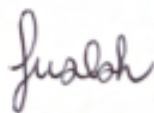
The application has been fully considered and is contrary to local and national planning policy.

The proposed driveway represents a risk to pedestrian and highway safety by virtue of substandard and unenforceable visibility splays, with a lack of on-site turning and insufficient depth in front of an access. Therefore, the proposed driveway is contrary to Manual for Streets (2007) and Kent County Council's Dropped Kerb Guidance and Self-Assessment (2023), as well as Policy CS11 of Gravesham's Local Plan Core Strategy (2014), saved policies T1 and T5 of Gravesham's Local Plan First Review (1994), and paragraph 116 of the National Planning Policy Framework (2024).

Recommendation

Refusal

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

Case Officer:	Mr Ethan Bonthron	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	28 th January 2025	Dated:	29 January 2025