



Delegated Report

Full Planning Application

Application No:	20251011
Location:	Harjit House, 7 Wrotham Road, Gravesend, Kent, DA11 0PD
Description:	Erection of a first-floor extension and mansard roof extension to enlarge one residential unit and create 2 new residential units. Associated building facade works and landscaping.
Applicant:	Mr J Johal
Site Visit:	27/01/2026

Submitted Documents/Plans

Block Plan & Location Plan – A01
Existing Basement & Ground Floor Plans – EX01
Existing First Floor & Loft Plans – EX02
Existing Elevations – EX04
Existing Sections – EX05
Proposed Basement and Ground Floor Plans - MRD-PL01-7WR.P02
Proposed First Floor & Loft Plans - MRD-PL02-7WR.P02
Proposed Roof Plan - MRD-PL03-7WR.P02
Proposed Elevations - MRD-PL04-7WR.P02
Proposed Sections - MRD-PL05-7WR.P02
Daylight, Sunlight & Overshadowing Assessment September 2025
Planning, Design and Access and Heritage Statement – Dated September 2025

Relevant Planning History

Reference	Description	Decision	Decision Date
20241015	Creation of new window openings, replacement windows and associated alterations.	PERMITTED	23.07.2025
20240070	Roof level extension to create 1x 1 bed flat and 1x 2 bed flat additional units (Use Class C3); first floor rear extension to make 1x 2 bed flat; altered external staircase access and internal rearrangement to make 1x 1 bed flat; new entrance and internal rearrangement to studio unit; and new window openings on the front and rear elevation.	REFUSED	04.04.2024
20231143	Application for a determination pursuant to Article 3, Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) as to whether Prior Approval is required in respect of the proposed change of use from office to 11 Flats, internal reconfiguration and all associated works.	PRIOR APPROVAL GRANTED	04.01.2024

19910077	Erection of two storey rear extension at first and second floor levels to form boardroom at first floor level with document store over.	PERMITTED	18.07.1991
19880706	Erection of single storey extension on the north elevation to form a document store.	PERMITTED	13.09.1988

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS07 – Economy, Employment and Skills
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (1994)

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- LT6 – Additional Open Space in New Housing Development
- P3 – Vehicle Parking Standards
- P5 – Change of Use of Building and Vehicle Parking Standards
- 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.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- 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

- 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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Upper Windmill Street Conservation Area Character Appraisal (2009)
- Darnley Road Conservation Area Character Appraisal (2009)
- Management Plan Gravesend Town Centre Conservation Areas (2009)

Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Consultations, Publicity and Representations

Internal Consultees

GBC Conservation Officer – No comments received

Local Ward Councillors – No comment received.

Neighbouring properties

A notice was displayed on site 22 October 2025.

In addition, sixteen surrounding properties were consulted and two representations were received, both registering objection to the development. The points raised in the representations have been separated into material and non-material planning considerations:

Note:– only the material planning considerations are relevant to this decision

Material Planning Considerations

- The extension would reduce light to their garden and would impact on the privacy of the garden.
- The development would result in additional parking pressure
- The development would result further waste management issues

Non-Material Planning Considerations

- Parts of the building are in a poor condition

The consultation period expired 14 November 2025.

Preliminary Matters

This application follows a refusal for a 'roof level extension' to the building (ref. 20240070). The plans below show the previous proposal:

Proposed Elevations



The application was refused on the following grounds:

1. *The proposed extensions are considered poor design, which fails to preserve or enhance the character and appearance of the Darnley Road and Upper Windmill Street Conservation Areas, by compounding the negative impact of the existing 1960s projection to the detriment of the historic qualities of the Conservation Areas. Therefore proposal does not meet the statutory test of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and is contrary to Policies CS19 and CS20 of Gravesham's Local Plan Core Strategy (2014), saved policy TC3 of the Gravesham Local Plan First Review (1994) as well as Sections 12 and 16 of the National Planning Policy Framework (2023).*
2. *The proposed development would provide undersized and cramped flats, with habitable rooms that would receive limited sunlight and be gloomy, dark spaces for future occupiers contrary to the Nationally Described Space Standards (2015) and Gravesham's Residential Layout Guidelines (2020). Furthermore, the roof extension would have a detrimental impact on habitable rooms of a flat approved in the conversion application, creating poor outlook and sense of enclosure to the detriment of amenity. Therefore, the development fails to safeguard future occupier amenity contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2023).*
3. *The proposed development would introduce additional built form on the roof of the existing extension within close proximity of the flank windows on the neighbour, impacting on amenity through outlook and unacceptable sense of enclosure. Furthermore, the extension would introduce a substantial number of windows on the front and rear elevations, impacting properties on Cobham Street breaching the minimum window-window distance set out in Gravesham's Residential Layout Guidelines (2020) and impacting on the private amenity space of the neighbour to the rear on Wrotham Road, creating unacceptable levels of direct and perceived overlooking. Therefore, the development is an unneighbourly form of development which fails to safeguard neighbouring amenity contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2023).*
4. *The proposed development fails to safeguard biodiversity or mitigate harm caused to the Special Protection Areas. Therefore, the development fails to comply with the requirements of the Habitat Regulations and fails to offset biodiversity loss contrary to Section 15 (specifically paragraphs 185 and 186) of the National Planning Policy Framework (2023) and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).*

As the current application proposed a similar extension to the roof, the previous grounds of refusal must be overcome for the development to be supported.

Officer's Analysis

Site Description

Harjit House is located at no.7 Wrotham Road, it is a two-storey building with a basement and rooms within

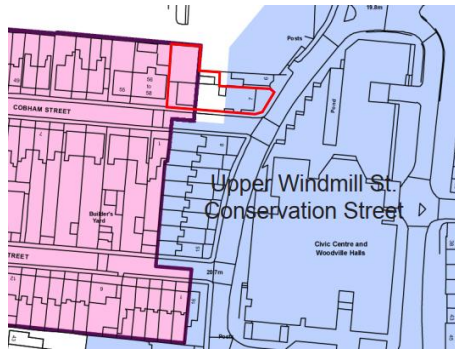
the roof space, located on a prominent corner of Wrotham Rd and Cobham St.



The property has been extended to the rear with a 1960s flat roof rear extension and a box roof dormer extension to the front and rear.



The building is located within the Darnley Road and Upper Windmill Street Conservation Areas.



Proposed Development

This application seeks to introduce an upward extension, the existing storage container on the roof of the building will be removed to facilitate the extension.



The proposed extension would increase the height of the existing rear projection by approximately 2.9m above the existing two storey section and 5.8m above the existing single storey element. It would extend across the entire footprint of the rear projection. The proposed extension would be a mansard style addition, and would have a parapet along the southern elevation fronting Cobham Street. The development would create space for 2no new flats and an enlargement to an approved unit (ref. 20231143).

Principle of Development

The principle considerations in the assessment of this application are:

- Housing Need
- Design and Impact on the Conservation Area
- Amenity of Future Occupiers
- Neighbour Amenity
- Parking and Highways
- Any Other Material Planning Considerations

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that 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 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 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 February 2025, it demonstrates that based on data for the period 2024-2029, the Council can only demonstrate a land supply of 3 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 Policy CS02 of Gravesham's Local Plan Core Strategy (LPCS) (2014) 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:

1. 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
2. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

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

- Habitats sites (and those sites listed in paragraph 194) 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 Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and
- 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 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 for a net increase of '2' residential units would offer a minimal contribution towards meeting this local need and, accordingly, officers considers that this should be accorded significant weight in support of the application. However, this has to be balanced against other requirements of the Development Plan and NPPF (2024) which requires new development to be high quality, beautiful and sustainable, and to create better places in which people can live and work, which also helps make development acceptable to existing local communities.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the National Planning Policy Framework (NPPF) and established local planning policy taken as a whole.

Design and Impact on the 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 First Review (LPFR) (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 (LPFR) also states that development is expected to make a positive contribution to the conservation area. As the application site lies within the Upper Windmill Street and Darnley Road Conservation Areas, 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.

From a historic building/conservation point of view, the main building make a positive contribution to the overall quality of the Upper Windmill Street Conservation Area, however the building has been extended into the loft and to the rear which have detracted from its historic qualities and negatively impact the character of the Conservation Areas. Specifically, the prominence of the 1960s rear extension is highlighted in the Conservation Area Appraisals (for both Darnley Rd and Upper Windmill St) as a negative feature encroaching into the character area. Moreover, the windows and panelling on the rear extension are metal framed and incongruous, which serve to further detract from the appearance of the Conservation Area.

Through previous applications, the windows and panelling on the extension have been improved with appropriate casement windows installed and the panelling removed. As part of this proposal, a new mansard roof extension would be constructed on the extension, set behind a parapet wall along the Cobham Street frontage, and the elevations of the extension will be finished in white painted render. These changes will alter the extension but are considered to improve the overall appearance and enhance the

Conservation Area as a result. The parapet wall and painted render are shared characteristics on Cobham Street and will serve to tie the development in with the surrounding context.

Moreover, the introduction of the parapet wall serves to partly conceal the roof lights windows ensuring these are less prominent and that the extension has a more traditional appearance, in-keeping with its location within the Conservation Area.

Overall, subject to conditions relating to materials and finishes, the proposed extension is considered to enhance the external appearance of the building and the Conservation Areas, utilising design strategies to tie in with the character of the street and significantly improve the appearance of the extension to enhance the Conservation Areas. As such, the proposal accords with saved policy TC3 (LPFR), Policies CS19 and CS20 (LPCS) as well as Sections 12 and 16 of the NPPF (2024).

Amenity of Future Occupiers

Policy CS19 (LPCS) 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’ (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These Nationally Described Space Standards (NDSS) came into effect on 1 October 2015.

The national housing standard guidance provides minimum gross floor areas for units, breaking down the number of bedrooms and bed spaces (persons). These figures have been compared to the proposed units and are shown in the tables below:

Flat	Proposed Floor Space	Amenity Space	National Space Standard (m²)
Flat 12 - (2b / 3p)	71.9m²	0m²	61m²
Flat 13 - (2b / 3p)	95.1m²	0m²	61m²

As shown above, if the flats are assessed at maximum capacity all units comply with the recommendations within the National Space Standards. Therefore, it is suggested that the units would provide acceptable accommodation and safeguards the amenity of future occupiers.

All rooms within the flats are also in accordance with the minimum floor areas of Gravesham’s RLG.

In summary it is considered that dwellings will provide acceptable living conditions for future occupiers and thus comply with the Council’s Residential Layout Guidelines (and National Space Standards) and therefore the proposal complies with CS19 (LPCS) and Section 12 of the NPPF (2024).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land and the NPPF (2024) requires development to have a high standard of amenity for existing users (In this case surrounding properties).

The proposed extension has been amended from the previous proposal, to be staggered on the western edge which ensures that there is separation to the flank window of the neighbouring property. The outlook from the window would be impacted by virtue of the extension, however the window is shown on historic plans to serve a kitchen, which is not a habitable room and therefore would not be impacted.

The new windows on the extension are approx. 16.7m from those of the neighbours on the opposite side of

Cobham Street. Whilst this would not meet the minimum 21m separation distance set out in Gravesham's RLG, the new windows are set behind a parapet wall and do not directly face the neighbours' windows. Furthermore, the separation distance between the windows would be comparable to that between the existing properties on the north and south of Cobham Street. As such, there would be no direct overlooking, and the privacy of the neighbours would be safeguarded.

As such, the proposed development safeguards neighbouring amenity in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Parking and Highways

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2024) states at paragraph 110, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2024) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe.

The site is in a central location in the town where public transport links are good and there are sufficient parking restrictions in the locality and public car parks available nearby. The plan indicates that there are two parking spaces provided within the rear service area, with provision in a secure cycle shelter for no.14 bikes.

Due to the sustainable town centre location, the provision of carparking is not required for the development. While it is noted that two spaces are shown on the plans it is not clear how these spaces are to be used, and the competition from 14no flats for the spaces should be addressed. As such, a condition requiring a parking management plan will be attached to the decision notice, to confirm how the parking would be allocated, and managed.

Overall, the proposal is not considered to result in any detrimental impact on the highway network and is in accordance with local and national planning policy.

Any Other Material Planning Considerations

Waste Management and Refuse

Policy CS19 (LPCS) requires new development to incorporate appropriate facilities for the storage and recycling of waste.

The plans demarcate a bin store within the rear service area, with 6no. bins shown within the store area. These are to be:

- Refuse Bins – 2x 1,100ltr
- Recycling Bins – 2x 1,100ltr
- Food Waste Bins – 2x 140ltr

This is considered to be sufficient for the number of residents within the building. However, a planning condition will be attached requiring further information on the refuse storage provision and the managements of the waste. This would ensure that waste is safely stored on site and can be safely

removed from the site.

Ecology and Biodiversity (Bird Mitigation)

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 housing development. Developers will need to pay £337.49 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.

In this instance, the proposed development would result in the creation of an additional residential property and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £337.49.

The applicant has paid the SAMMS Mitigation Contribution Agreement and therefore meets the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 193 and 194) of the NPPF (2024) and Policy CS12 (LPCS) (2014).

Commented [EB1]: Waiting on SAMMS confirmation - but agent said applicant is due to pay

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. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The proposed development would not affect 25m² of onsite habitat and does not impact an onsite priority habitat and therefore is a de-minimis exception. This has been confirmed by Kent County Council Biodiversity, who stated that *"the land affected has a biodiversity value of zero and mandatory biodiversity net gain is not applicable to sites which have a biodiversity value of zero. We understand no linear habitats are to be affected by proposals"*. Therefore, no additional information is required under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

Suggested Conditions

- Three-year time limit
- Approved plans
- External facing materials to be submitted and approved
- Bin store and waste management details
- Car parking Management Plan

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ade Lawal	Team Leader:	Richard Hart
Signed:	<i>Ade Lawal</i>	Signed:	<i>R Hart</i>
Dated:	27 th January 2026	Dated:	28 th January 2026