



Wednesday, 16 September 2026

Objection to Application 20260864

Site Address: 123 Chalk Road, Gravesend, Kent, DA12 4UT

Description: Partial demolition and reconstruction/reconfiguration of existing bungalow, with gable end and rear dormer roof extensions and single storey rear extension, plus demolition of existing garage, creation of new access road and construction of 2 x four-bedroom bungalows and associated cycle, refuse storage and amenity space

Introduction:

This representation has been submitted on behalf of [REDACTED] whose property [REDACTED] is the application site. The application proposes the wholesale redevelopment of the garden of 123 Chalk Road to accommodate two additional four-bedroom dwellings, together with a materially enlarged host dwelling and a new shared vehicular access.

The Site and the Proposal

The application site comprises the rear garden of 123 Chalk Road, a single, modestly sized bungalow set within a row of similar dwellings fronting Chalk Road. It is bounded on both sides by the rear gardens of nos. 121 and 127 and 129 Chalk Road, with the dwellings of Villa Close to the north. No dwelling presently exists to the rear of the frontage properties in this part of Chalk Road, and the prevailing pattern of development is one of single dwellings set within individual plots with sizeable rear gardens. There is no local precedent for the introduction of a further dwelling, still less two in the garden of a residential plot in this location.

The proposal seeks planning permission for the part demolition and reconfiguration of the existing bungalow at 123 Chalk Road, incorporating gable end and rear dormer roof extensions and a single storey rear extension, together with the demolition of the existing garage, the formation of a new shared access, and the erection of two further four-bedroom dormer bungalows to the rear of the plot, each with associated parking, cycle storage, refuse storage and private amenity space. The effect of the application would fundamentally restructure the shared and private space of the site to accommodate the increased intensity.

Discussion of Scheme:

Backland Development, Character and the Effective Use of Land

It is submitted the proposal represents backland development of a character wholly foreign to this part of Chalk Road, and that its introduction would cause significant harm to the grain and pattern of the surrounding area. Policy CS19 of the Gravesham Local Plan Core Strategy requires that the design, layout and form of new development be derived from a robust analysis of local context and character, having regard to the scale, height, building lines and layout of adjoining development, in line with the guidance set out in the Kent Design Guide. The Design for Gravesham Design Code reinforces this requirement at Design Principle 5.9, which provides that new development must respond sensitively to the prevailing pattern and intervals of existing development to reflect the

grain of the existing character area. The introduction of two further dwellings into a garden plot that presently forms part of the private amenity space of a single dwelling would fracture this established pattern, substituting a single, generously proportioned plot with a cramped and visually incongruous cluster of three dwellings accessed from a single point.

A significant portion of what is presently soft, undeveloped garden land would further be given over to hardstanding to accommodate the access road, parking and turning space required to serve the additional dwellings, compounding the harm to the visual amenity of the locality and eroding the verdant character presently afforded by the plot.

Policy CS14 requires that new housing development take into account the existing character of the area, and Policy CS15 requires that density be consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated, having regard to the character and location of the area, may be refused. Neither test is met here. The character of this part of Chalk Road is defined by individual dwellings set within generous plots, each enjoying a private and undeveloped rear garden. The proposal would introduce a density and pattern of development that has no precedent in the surrounding area, and that cannot be reconciled with the objectives of Policies CS14, CS15 and CS19.

The proposal also falls to be tested against Policy L2 of the National Planning Policy Framework, which governs the effective use of land through additional development within existing residential curtilages. Policy L2(1)(d)(ii) requires that such development maintain acceptable living standards for both existing residents and their neighbours in terms of access to daylight, sunlight, privacy and external amenity space, and Policy L2(1)(d)(iii) requires that it should not occupy more than twice the footprint of the existing buildings on the site, and should retain at least 50% of the non-developed area of the curtilage following development, unless it can be demonstrated that the additional development can be accommodated without harm to the overall character of the area.

Given the scale of what is proposed, being the introduction of two additional four-bedroom dwellings, a new access road, and associated parking area, it is submitted that the resultant development fails to retain 50% of the plot undeveloped, and it appears that the built development would exceed twice the footprint of the modest existing dwelling. The applicant has not demonstrated compliance with either limb of this test. This failure, arising from development within a residential curtilage, is expressly identified at Policy S4(2)(a)(ii) of the Framework as a matter capable of amounting to a substantial adverse impact for the purposes of the presumption in favour of sustainable development, and accordingly the application should be refused.

Design Harm to the Host Dwelling

The harm arising from this proposal is not confined to the two backland units. The alterations proposed to the host dwelling have been driven by the practical requirements of accommodating a shared access and two further dwellings, rather than by any considered, design led assessment of what the host property itself could appropriately bear.

In order to accommodate the new shared access alongside the existing dwelling, the plan width of the bungalow itself is to be reduced, with hip to gable extensions to both sides of the roof, together with a rear dormer. The cumulative effect of narrowing the building at ground floor level while extending it outward at roof level would leave the host dwelling with an awkward, top-heavy proportion, tall and narrow in relation to its reduced footprint, unlike the modest, hipped, single storey bungalow that presently occupies the plot.

This outcome is contrary to the Council's design guidance. Design Principle 5.16 of the Design for Gravesham Design Code requires that elevation design respond to the scale and proportion of the surrounding character area, and that a building's proportions be properly balanced between its base, middle and top. None of these tests can be met by a form of development that narrows a bungalow at ground level to squeeze in an access road, keeping the original roof height and introducing gabled ends. The resulting design has been contrived to accommodate the wider proposal, rather than arrived at through the robust, context led design process that Policy CS19 and the Design for Gravesham Design Code both require.

Residential Amenity

Policy L2(1)(d)(ii) of the National Planning Policy Framework requires that additional development within a residential curtilage maintain acceptable living standards for both existing residents and their neighbours in terms of privacy. The introduction of two further dwellings with dormer windows, together with the gable end and rear dormer extensions to the host property, would place habitable room windows well above the height of that boundary treatment.

High level dormer windows in these positions would provide direct, elevated views over garden fences and hedges and into the rear gardens, patios and rear-facing windows of the neighbouring properties at nos. 121 and 127 Chalk Road. The Council's adopted Residential Layout Guidelines state that a minimum distance of 21 metres should be provided between the windows of habitable rooms and the private garden area of any neighbouring dwelling, defined as the first five metres of garden adjacent to the rear of that dwelling.

The same is true of the relationship between the new backland dwellings and the host property itself: positioned close behind and beside the reconfigured bungalow at 123 Chalk Road, the new units would look down into its rear garden and rear windows just as readily as into those of the neighbours on either side.

There would also be overlooking impacts on dwellings to the north, on Villa Close, from the proposed windows. The proposed dwellings sits higher than the dwellings on Villa Close, exacerbating the overlooking and loss of privacy that would result.

The proximity of the proposed dwellings to the shared boundaries with nos. 121 and 127 will have an overbearing impact, materially diminishing the outlook currently enjoyed from neighbouring gardens and windows, and increasing the sense of enclosure experienced by their occupiers. For the reasons set out in this section, it is submitted that the proposal fails the living standards test at Policy L2(1)(d)(ii) of the Framework.

Further to this, the widened access will bring materially increased vehicle movements directly alongside the boundary with no. 127 and the host dwelling, giving rise to additional noise, vibration and general disturbance throughout the day. The submitted layout also places parking for the proposed dwellings against the boundary with no. 121, introducing vehicle manoeuvring, headlight glare and further noise and disturbance directly adjacent to the private garden and rear rooms of that property.

Policy P3 of the National Planning Policy Framework requires that development proposals provide healthy living conditions for existing as well as future occupiers, and that they do not give rise to unacceptable levels of noise or other pollution affecting neighbouring residents. It is submitted that the cumulative increase in traffic movements, vehicle noise and general disturbance generated by three dwellings sharing a single access, together with parking positioned immediately against the

boundary of no. 121, is contrary to Policy P3 and to Policy CS19 of the Core Strategy, and compounds the privacy and overbearing harm identified above.

Ecology

It is understood that the application site has already been subject to significant clearance works, undertaken well in advance of the submission of this application and of any ecological assessment capable of establishing the baseline habitat value of the plot, and that the manner in which this clearance was carried out was such as to result in an abatement notice being served by the Council on those responsible for the works, in respect of the burning of waste materials on site, itself a matter that has already caused nuisance to neighbouring occupiers.

This sequence of events is directly relevant to the Council's ability to assess the ecological implications of the proposal. The Design for Gravesham Design Code requires, at Design Principle 6.8, that a qualified ecologist undertake an initial assessment of the biodiversity value of a site before the layout is developed, with a view to retaining and enhancing existing biodiversity value, and provides that existing trees and valuable habitat features should be integrated into the site layout with a presumption against their removal.

Design Principle 6.6 of the Code further provides that trees, hedges, woodland and natural green spaces should be integrated into design proposals with a presumption against removal in all instances. Policy N2 of the National Planning Policy Framework similarly requires development proposals to conserve and enhance existing natural features of nature conservation value where possible, such as established trees and hedgerows, to minimise adverse impacts on biodiversity, and provides that development should be refused where significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for.

Paragraph 5.7.24 of the Core Strategy, in support of Policy CS12 (Green Infrastructure), further confirms the Council's commitment to securing no net loss of biodiversity in the Borough. Where a site has already been cleared before any such assessment has taken place, it is submitted that the Council cannot be satisfied that this sequence, and the substantive protections it is designed to secure, have been properly observed, and that the Council should require clear evidence of the pre-clearance condition of the site, and of any biodiversity net gain calculation and habitats, before the ecological acceptability of the proposal can be established.

Highway Safety and the Adequacy of the Proposed Access

Chalk Road is a busy residential road serving a substandard, signal-free junction with the A226, the principal through route across the Borough. The applicant's Highway Statement confirms that road traffic collisions have already been recorded at this junction, and while the applicant's consultant seeks to attribute these incidents to driver error rather than any deficiency in the highway network, the fact remains that this is a location at which collisions are already occurring, immediately adjacent to the site access that this application seeks to widen and intensify.

The Highway Statement records that a visibility splay of 2.4 by 43 metres is achievable to the north-west of the access, consistent with the plated 30mph speed limit. To the south-east, towards the A226 junction, the applicant's own assessment records a materially shorter splay of only 2.4 by 26.6 metres to the kerb line, extending to 29.9 metres when measured 0.5 metres into the carriageway, which equates to a safe design speed of only 21mph and 23mph respectively, well short of the 43 metre splay achieved in the opposite direction and required for the road's 30mph limit.

The Highway Statement seeks to justify this shortfall on the basis that vehicles turning into Chalk Road from the A226 junction are likely to be travelling more slowly than the visibility achieved further down the road towards that junction. No speed survey or other empirical evidence is presented in support of that assumption. An unevidenced assumption as to reduced vehicle speed is not a sound basis on which to conclude that the intensification of use now proposed would not compromise highway safety.

Policy TR6 of the National Planning Policy Framework requires that development proposals be refused where they would have an unacceptable impact on highway safety, taking into account potential cumulative impacts, and Policy DP3(2)(d) requires that new development provide transport infrastructure that supports safe movement. The Council's Householder Extensions and Alterations Design Guide directs applicants to Kent County Council's design guidance on visibility splays, underlining the importance the Council attaches to robustly demonstrated sightlines. It is submitted that the intensification of use at a substandard access, on a road already experiencing collisions at its junction with the A226, is contrary to Policies TR6 and DP3(2)(d), and represents an unacceptable risk to highway safety that outweighs any benefit that might be said to arise from the proposed dwellings.

Parking:

Kent County Council parking standards applicable to this suburban location require two car parking spaces per unit for both three and four bedroom houses, together with cycle parking of one space per bedroom. On this basis, the three dwellings that would result from the proposal would require a minimum of six car parking spaces across the site, and no fewer than eight cycle parking spaces for the two new four-bedroom units alone, before any further provision for the enlarged host dwelling is taken into account. It is submitted that the land take necessary to accommodate this level of parking provision, on a plot of this size, can only compound the overdevelopment and effective land use concerns raised above, and further reduces the prospect of the scheme retaining anything approaching the private garden and amenity space required by the Council's own standards.

The application form records only two existing parking spaces at 123 Chalk Road, reflecting the driveway that presently serves the property, yet it is that same driveway which the proposal would convert into the shared access road, removing the only existing on-plot parking for the host dwelling entirely. The application form goes on to state that six parking spaces are proposed across the site as a whole, but only four are shown on the submitted drawings, leaving an unexplained shortfall of two spaces between what the applicant claims and what has actually been demonstrated. Should the missing provision be intended to be accommodated within the front garden of 123 Chalk Road, there is doubt as to whether that area is of sufficient size to accommodate two further vehicles, and that, even if it were, siting additional parking so close to the mouth of the access would be liable to obstruct the visibility splay. On this basis, it is submitted that the application has not demonstrated that adequate parking can be provided for the development at all.

Conclusion

The proposal represents an unjustified and harmful instance of backland development that conflicts with Policies CS14, CS15 and CS19 of the Gravesham Local Plan Core Strategy, and with Policy L2 of the National Planning Policy Framework

It would result in an unacceptable loss of privacy and residential amenity to the occupiers of the host dwelling, Nos. 121 and 127 Chalk Road, and residents of Villa Close to the north, contrary to the Council's adopted Residential Layout Guidelines and Policy L2(1)(d)(ii) of the Framework.

The clearance already carried out on the site, in advance of any ecological assessment raises concerns as to compliance with Policy N2 of the Framework, paragraph 5.7.24 of the Core Strategy supporting Policy CS12, and Design Principles 6.6 and 6.8 of the Design for Gravesham Design Code.

The proposal would intensify use of a substandard access at a location already associated with recorded highway collisions, contrary to Policy TR6 of the Framework.

For each of these reasons, considered individually and cumulatively, it is requested that the application be refused.