

Planning Statement

Site on Old Manor Drive, Off Echo
Square, Gravesend, Kent, DA12 1NP

Erection of a new single-storey detached
dwelling with associated access and
parking space



By: GRAHAM SIMPKIN PLANNING

For: Mr J Loker

Project reference: PR4288

13 October 2025

office@gsplanning.uk



Contents

1	Introduction	3
2	Site Context.....	4
3	Relevant History	4
4	Proposed Development	5
5	Planning Policy	5
6	Planning Assessment	9
7	Conclusions.....	12

1 Introduction

- 1.1 This Planning Statement has been submitted in support of an application for the following development at Site on Old Manor Drive, Off Echo Square, Gravesend, Kent, DA12 1NP (hereafter referred to as 'the Site'):

Erection of a new single-storey detached dwelling with associated access and parking space

- 1.2 The proposed development affects the following Land Registry title(s):

Title Number	Description	Owner
K54104	LAND ADJOINING, ELM CLOSE OLD MANOR DRIVE, GRAVESEND DA12 1QD	LINDA ANN LOKER of 24 St Albans Hill, Hemel Hempstead, Hertfordshire HP3 9NG
K83751	LAND LYING TO THE NORTH OF OLD ROAD EAST, GRAVESEND.	LINDA ANN LOKER of 24 St Albans Hill, Hemel Hempstead HP3 9NG.

- 1.3 The application is accompanied by the following plans and documents:

- Application Form
- Planning Statement (GSP)
- Phase 1 Contamination Assessment (R Carr Geotechnical Services)
- BNG Small-Sites Metric (KB Ecology)
- Kent Biodiversity Gain Statement
- Preliminary Ecological Appraisal (KB Ecology)
- Reptile Survey and Report (KB Ecology)
- Tree Survey and Report (GRS Arboricultural Consultant)
- Drawing nos.
 - 4288.01 Site Location Plan
 - 4288.02 Existing Block Plan
 - 4288.03 Proposed Block Plan
 - 4288.04 Proposed Bungalow

2 Site Context

- 2.1 This Site is located to the north east of Echo Square and accessed from Old Manor Drive a unadopted private road. It is located to the rear of a detached dwelling 'Elm Close' and originally formed part of the curtilage of Elm Close. It was separated from Elm Close around 18 Years ago and has remained fenced and vacant since that time. It is surrounded by other residential development. To the south west of the Site, the properties fronting Echo Square are in commercial use on the ground floor with residential accommodation above. These properties are served by a rear access that forms the south-west boundary of the Site.
- 2.2 The Site extends to approximately 745m² (0.075ha) in area and is 'L-shaped' in form, wrapping round the north east and south east sides of Elm Close. The boundary with Elm Close is formed by a wood panel fence 1.8m in height.
- 2.3 This Site has no allocation or designation in the adopted Development Plan and is located within the defined urban area of Gravesend.
- It is located within Flood Zone One.
 - The Site lies within 6km of the Thames Estuary and Marshes Ramsar sites/Special Protection Area (SPA) which are internationally important for their bird populations. There have been declines in bird populations and studies show that new dwellings could lead to further declines due to increased recreational pressure. A mitigation scheme and strategy has been developed by affected North Kent Local Planning Authorities in conjunction with Natural England. This is referred to in greater detail later in the statement.

3 Relevant History

- 3.1 The following records are understood to be relevant to the Site, the records include those for Elm Close, the adjacent detached dwelling which the application site originally formed part of the curtilage of:

Planning Applications (4)

- Ref. No: 19880431: Outline application for the erection of a detached dwelling and garage: Application Refused
- Ref. No: 20060918: Erection of part two storey and part single storey side/rear extension; single storey rear extension and construction of two dormer windows in existing side roof slope to form living room, sitting room

and sun room at ground floor level with two bedrooms at first floor level:
Application Permitted

- Ref. No: 20070600: Erection of two storey side extension and single storey rear extension to form enlarged living room, sitting room and sun room at ground floor level with two bedrooms and bathroom/wc at first floor level; construction of two dormer windows in side roof slope to provide two ensuite bathroom/W.C's at first floor level and erection of a car port at side: Application Permitted
- Ref. No: 20080364: Change of use of part of ground floor from residential to a dental surgery with reception/waiting area: Application Refused

4 Proposed Development

- 4.1 The application entails the following elements:
Erection of a new single-storey detached dwelling with associated access and parking space
- 4.2 The proposed dwelling would be located in the portion of the Site to the south east of Elm Close. Access would be via an existing gate from Old Manor Drive along the side of Elm Close to a parking area. Turning space would also be provided on site.
- 4.3 The dwelling would be 11.2m long by 7.5m in width and 5.1m to the ridge and approximately 2.7m to eaves level. The accommodation would comprise two bedrooms (a double and a single), a lounge/kitchen/dining room and a family bathroom. It meets the Nationally Described Space Standards.
- 4.4 Two parking spaces would be provided along with a space to allow vehicles to turn within the site.
- 4.5 The proposal will involve the direct loss of two trees on the site and there are also some trees on the adjacent site where there is potentially some impact on the tree roots. A separate arboricultural report is provided to address these issues and provide necessary mitigation.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development

plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.

- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 It is understood that the Development Plan for the area within which the Site is located comprises the following documents:
- Core Strategy 2014
 - Saved Policies Local Plan First Review 1994
- 5.6 In the Development Plan, the following policies are considered most relevant in the determination of this application:

Core Strategy

- CS01 Sustainable Development
- CS02 Scale and location of New Development
- CS12 Green Infrastructure
- CS14 Housing Size and Type
- CS15 Housing Density
- CS18 Climate Change
- CS19 Development and Design Principles

Gravesham Local Plan First Review 1998 (Saved Policies)

- T1 Impact of development on the highway network
- P3 Vehicle Parking Standards

Other Material Considerations

The Framework NPPF 2024 as amended February 2025

- 5.7 As indicated above, whilst s38(6) requires planning decisions to be made in accordance with the development plan, it is also relevant to undertake an assessment of whether there are any other material considerations that would point to a different conclusion and decision being reached.
- 5.8 The adopted Development Plan must now be considered as largely being out of date, even though there is some conformity with the NPPF, but not in relation to the supply and delivery of housing (see below).
- 5.9 The National Planning Policy Framework (NPPF) December 2024 is a relevant material consideration. Paragraph 7 advises that the fundamental basis of the planning system is to achieve sustainable development and paragraph 8 outlines the three integral and intertwined overarching objectives in pursuit of sustainable development (economic, environmental and social). Paragraphs 10 and 11 set out a presumption in favour of sustainable development. Paragraph 11 advises that when decisions are made on applications (taking into account the footnotes 7 & 8 and 9 in the NPPF which are reproduced below):

*'For **decision-taking** this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date¹, granting permission unless:

¹ 8 This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.

- i the application of policies in this Framework that protect areas or assets of particular importance² 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 combination³.*

- 5.10 Gravesham Borough Council cannot currently demonstrate a five-year supply of deliverable housing sites. As of 1 April 2024 as updated/published in February 2025 to take into account the December 2024 NPPF, the Council's 5-year Housing land supply was calculated to be 3 years.
- 5.11 The Council has also continued to un-deliver in terms of the Housing Delivery Test (HDT). The latest published HDT measurement issued on 12 December 2024 advises that Gravesham have delivered 1056 units as opposed to a requirement of 1789 units. This represents just 59% of the required number of dwellings albeit it is a small improvement from the 53% outlined in the previous year's results. As such permission should be granted for applications if they accord with an up-to-date development plan unless the site is protected under the National Planning Policy Framework or the adverse impacts of development significantly and demonstrably outweigh the benefits.
- 5.12 Section 5 of the NPPF sets out policy in relation to the supply of homes. At paragraph 61, it continues to confirm the Government's objective to significantly boosting supply and that it is important to ensure that a sufficient amount and variety of land can come forward where it is needed. Paragraph 73 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should (amongst others) support the development of windfall sites through their policies and decisions.
- 5.13 Section 11 sets out policy in respect of making effective use of land. Paragraph 124 states that decision should promote an effective use of land in meeting the need for homes. Paragraph 125 expands on this point by promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. Paragraph 129 adds that decisions should support development that makes efficient use of land, taking

² 7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change

³ 9 The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter

into account (amongst others) the desirability of maintaining an area's prevailing character and setting.

- 5.14 It is noted that the application of paragraphs 61, 73, 124-125 and 129 all do not depend on whether an authority has a five-year housing land supply (5YHLS).
- 5.15 Section 12 of the NPPF provides guidance and policy on achieving well designed places. Paragraph 131 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. A bespoke design solution has been provided for this site; the resultant development will be of a high quality and will not detract from the character of the surrounding area.

GRAVESHAM Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted February 1996 - amended June 2020 (SPD)

- 5.15 The SPD sets out standards which new residential development across the District will be expected to meet. As indicated earlier the proposed dwelling meets Nationally Described Space Standards a requirement of the SPD. The SPD stipulates also stipulates minimum garden sizes and lengths. For 1-2 bedroom units these are as follows;

Accommodation with :	Minimum garden area (sq. metres)	Minimum depth from rear wall of house (metres)
1-2 bedrooms	37.2	7.6

6 Planning Assessment

Key Issues

- 6.1 The following are considered to be the key issues in the assessment of this application:
- Principle of Development
 - Impact on amenity of existing nearby occupiers and future occupiers of the proposed development
 - Ecology and Biodiversity including the Thames Estuary and Marshes SPA and Ramsar sites

Principle

- 6.2 Whilst the Site is located within the urban area, it is physically separate from and does not form part of any established residential curtilage and indeed, has not done so, for around 18 years. The previous segregation of the Site is therefore considered to have created a new Planning Unit.

- 6.3 In principle as undeveloped land in the urban area, it is considered that the development proposed would not be contrary to Development Plan policy, subject to all aspects of the proposed development otherwise being acceptable.
- 6.4 Development on the Site would also be in line with the renewed emphasis on securing development of suitable urban land first, rather than looking to land outside urban areas.

Amenity

- 6.5 In terms of potential impact on occupiers of existing nearby dwellings, the new dwelling has been designed with principal windows facing north-east/south-west. Any flank windows serve non-habitable rooms. There is more than adequate separation from the existing surrounding housing to ensure the new development will not adversely affect the amenities of existing residents.
- 6.6 The proposed amenity space for the new dwellings extends to approximately 162m², substantially more than the minimum requirement as set out earlier in paragraph. The depth of the garden from the rear wall of the house to the south west site boundary is in excess of 12.5m also substantially more than the Council's SPD advocates.

Ecology and Biodiversity

- 6.7 A Tree survey and subsequent Arboricultural Report has been undertaken and provided by GRS Arboricultural Consultant.
- 6.8 The report outlines tree protection measures and recommendations for site management during works within the site. These include temporary ground protection and specific advice as to foundation construction. The proposals have been amended to move the proposed dwelling forward to further minimise any impact on the tree roots. These protective measures can be the subject of a condition of planning permission.
- 6.9 A Preliminary Ecological Assessment of the Site has been undertaken which identified the need for a Reptile Survey which has also been undertaken. The subsequent report is submitted as part of the application documentation.
- 6.10 The required BNG metric is also submitted alongside the application. In this case a Small Sites Metric has been completed by the Ecological Consultancy (KB Ecology) who undertook the survey work.
- 6.11 Given the size of the site it is the case that an off-site BNG requirement will be needed as the site is not large enough to fully compensate and meet the required 10% enhancement required under BNG legislation.

Impact on the Thames Estuary and Marshes Special Protection Area/Ramsar Sites

- 6.12 Policy CS12 of the Core Strategy seeks to protect and enhance Green Infrastructure and to ensure no net loss of biodiversity in the Borough. The Thames Estuary and Marshes SPA and Ramsar sites are an important and integral part of the Borough's Green Infrastructure, but they have increasingly been under recreational pressure from residential development in nearby areas on an in-combination basis, which has affected their role and existing biodiversity.
- 6.13 The SPA/Ramsar sites are a European designated sites afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitat Regulations). SPAs are protected sites classified for rare and vulnerable birds and for regularly occurring migratory species. Article 4(4) of the Birds Directive (2009/147/EC) as now adopted in UK law following Brexit requires Member States to take appropriate steps to avoid pollution or deterioration of habitats or any disturbances affecting the birds, in so far as these would be significant having regard to the objectives of this Article.
- 6.14 This proposal therefore has potential to affect the said sites' features of interest. The Council as the 'Competent Authority' is required to consider whether Appropriate Assessment under the Habitat Regulations is required.
- 6.15 The proposed development is of a very small scale, and in itself, would not have a direct adverse effect on the integrity of the SPA. However, in combination with other development and proposed development, there is considered to be a likely impact in terms of additional recreational pressure. In the light of this, Natural England the Government's Conservation Body has stipulated that, when considering any residential development within 6km of the SPA, Councils should secure financial contributions to the Thames Estuary and Marshes Strategic Access Management and Monitoring (SAMM) Strategy in accordance with the recommendations of the North Kent Environmental Planning Group (NKEPG), and that such strategic mitigation must be in place before the dwellings are occupied. Such a mechanism was put in place in 2015 following discussion with Natural England and the affected North Kent Authorities. This is applied to all proposed residential development situated within 6km of the SPA/Ramsar Sites.
- 6.16 The applicant is committed, prior to the determination of the current application, to make an appropriate SAMMS payment of at the currently published rate of £314.05/dwelling and relating to the net increase of one dwelling.
- 6.17 Upon making the SAMMS payment, the Council will be invited to find that any in-combination impact on the SPA/Ramsar sites would have been appropriately mitigated.

Other issues

- 6.18 The level of traffic generation following from the erection of the dwelling will not give rise to conditions prejudicial to highway safety on Old Manor Drive or the local publicly adopted road network. Full rights of access along Old Manor Drive are available for the Site.
- 6.19 The site is located in Flood Zone One and as a result is not in an area vulnerable to flood risk. There is no indication that the site or its access will be directly affected by Surface Water Flooding, as indicated on the Government's Flood Map for Planning.
- 6.20 The Contamination Assessment Report indicates that the site has not been impacted by on or off-site activity and that no significant pollution linkages have been identified. Other than disposal of any existing rubbish/material no further action is needed on the site.

7 Conclusions

- 7.1 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority and it is respectfully requested that this submission is approved.