

Delegated Report

Planning Application

Planning Application No: 20250740

Location: 110 Singlewell Road, Gravesend DA11 7PT

Description: Formation of vehicular access on to a 'C' classified road and provision of one off-street parking space in front garden with associated hard standing.

Applicant: Mrs Fenella Gath

Site Visit Date: 7 August 2025

Submitted Documents/Plans

Application form
Planning Statement
Drawing no. 01 (site location plan)
Drawing no. 02 (existing block plan)
Drawing no. 03 (existing plans)
Drawing no. 04 (proposed block plan)
Drawing no. 05 (proposed plans)

Relevant Planning History

20211115	Erection of a two storey and part single storey rear extension.	Permitted	08.11.2021
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122 Singlewell Road:

20050819	Formation of a vehicular access onto a classified road.	Refused, appeal dismissed	08.12.2005
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Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

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

- T5 – Access to the Identified 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 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 9 – Promoting Sustainable Transport
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- Kent County Council Dropped Kerb Guidance and Self-Assessment (2025)
- Kent County Council's Parking Standards (January 2025)
- Kent Design Guide (2006)
- Gravesham Driveway Dropped Kerb Guidance (Informal Guidance) (2023)
- Gravesham Front Driveway Design Guidance (Informal Guidance) (2023)

Consultations, Publicity and Representations

Consultees

Kent County Council Vehicle Crossing Team

The vehicle crossing team have viewed the proposal, we would like to advise that the applicant would they need to meet our minimum measurements criteria of 4.8m depth + 2.4m minimum width for perpendicular parking.

Kent County Council's (KCC) minimum dropped kerb would be 4 dropped kerbs and 2 tapers (5.4m width). Where a larger construction or extension to an existing dropped kerb is requested, approval will only be granted if there is no significant impact to on street parking demand.

There is a KCC drainage asset that has been identified at the point of the crossing this will need approval from the local drainage engineer that that this would not be affected by the installation of a dropped kerb.

The applicant will need to demonstrate that visibility splays can be achieved.

There is a concern over highway safety should a vehicle exit property in reverse. Approval would be subject to an inspection by a KCC officer and is not guaranteed.

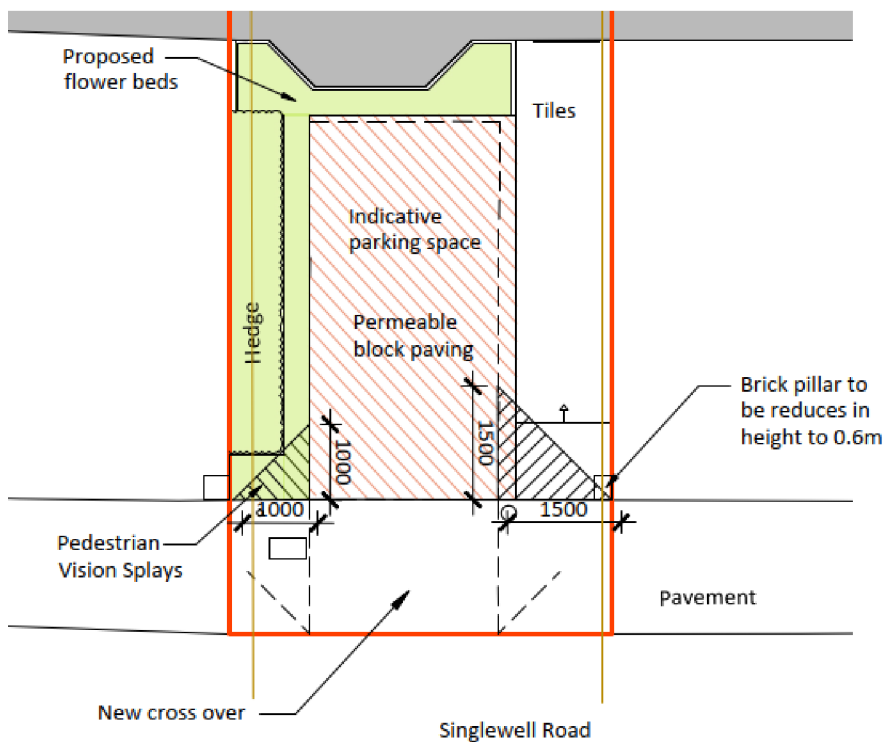
Neighbouring properties

The application has been advertised by site notice and individual letters to five neighbouring properties. No letters of representation have been received.

Officer's Analysis

Proposal

This application seeks planning permission for the formation of vehicular access on to a 'C' classified road and provision of one off-street parking space in front garden with associated hard standing as shown below:



Design, Character and Appearance

Paragraph 135(a) of the NPPF (2024) seeks to ensure that development will add to the overall quality of the area, not just for the short term but over the lifetime of the development. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area. This policy is expanded upon by the Borough's Design Code, Design for Gravesham.

The Design for Gravesham Guide States that "Accesses to parking should also be of safe design, incorporating adequate sight line visibility to avoid vehicular/pedestrian and other potential conflicts"

Gravesham SPD4 – Householder Alterations and Extensions Guidance 2021 states that "Boundary treatments visible from the street should be consistent with the height of other enclosures on the road". It also goes on to say:

- Hardstanding should be proportionate to the size of the dwelling and the relevant car parking standards and avoid paving over a significant amount of the forecourt. Soft landscaped planted border along all boundaries should be provided in all spaces not specifically defined as parking or turning spaces.
- Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property. 1 metre should be the minimum space between or around car parking spaces.
- Front garden parking must be designed to avoid cars overhanging the pavement. Car parking spaces a minimum of 2.5m wide (2.7m where spaces adjoin an enclosed boundary) and 5m deep should be

provided.

- Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked.
- Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway.
- Avoid removing any existing trees or established hedges and introduce new planting wherever possible.
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of Permitted Development.
- There should be no water run-off from the forecourt onto the public highway.
- Where loose surfacing is proposed, a minimum of 1m depth of non-loose hardstanding should be provided at the front edge of the driveway with the public highway
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling.
- Pedestrian and vehicle visibility splays should be provided.

Gravesham's Front Driveway Design Guidance provides the below examples for acceptable frontages:



Avoid removing existing trees and shrubs and paving over a significant amount of the forecourt



Boundary treatment responding to the style of the dwelling with planting to enhance biodiversity and increase wildlife habitat.



Consider the original garden layout and maintain a sense of place.

The below examples are considered unacceptable and contrary to guidance:



The guidance continues to say:

“Your property can have a significant visual impact and should be designed to take account of any dominant form of boundary treatment in your street, taking into consideration materials and detailing. Boundaries define the relationship between your dwelling and the street and include garden walls, fences, and hedges. Existing boundary treatments and garden walls should be retained where they allow sufficient visibility splays to avoid open planned front gardens. A strong front boundary treatment should be incorporated into proposals, particularly where this is characteristic of the street. Where hedges and trees are an important feature, these should be kept maintaining the character of the street and sustaining biodiversity.”

The proposal will be assessed in accordance with the above local and national planning policies to ascertain whether it complies.

The application site is a two storey terrace dwelling dating from the Edwardian period with an attractive front garden laid to lawn, a hedge to the front and a low boundary wall located on the eastern side of Singlewell Road as shown below:



It also has a tiled path that matches the neighbouring properties. Opposite are two storey terraces differing in character with smaller front gardens. The road has on street parking on both sides. There are double yellow lines directly outside the application site with unrestricted parking to the south and parking bays further to the north.

The frontages to the terrace of houses from number 70 to 124 all remain intact and contain a varying degree of soft landscaping and boundary treatment which contribute positively to the street scene. None of the properties have dropped kerbs or parking to the front which results in a pleasant character and a greening to the east of the road where this is not possible to the west due to the proximity of these properties to the road.

It should be acknowledged that having parking to the property frontage provides occupants with a number of benefits for modern day lifestyles, however it is important that the parking complies with the Council's adopted policies to ensure that there is no harm to the character of an area and that the proposal does not result in danger to road users and pedestrians.

The proposed use of materials is not indicated but the drive will utilise permeable paving to minimise rainwater run-off and the plans show the tiled pathway to remain which is encouraged.

The proposal would create an access by removing the attractive front boundary wall and hedge and reducing the height of the southern brick pier. The access would be approx. 2.75m wide. The proposed parking space would be approx. 2.7m wide and 5.1m deep. Visibility splays of 1m x 1m are shown to the north and 1.5m x 1.5m to the south. An area for flower beds is shown directly in front of the house and a hedge to the northern boundary.

KCC Parking standards state that a parking space for one vehicle should measure 5.0m deep with a width of 2.5m however the width of end spaces abutting an enclosed boundary should be increased to 2.7m. The proposed plan shows that this space can be accommodated.

Whilst some soft landscaping will be retained this is significantly less than currently on site and will have a detrimental impact on the wider character and appearance of the street scene. The loss of the boundary wall to the front of the property, which is a strong feature of this terrace, will result in harm to the surrounding area in terms of appearance and would encourage other applications for similar proposals which would erode the character all together.

An appeal at 122 Singlewell Road (APP/K2230/A/06/2008466 – appendix 1) was dismissed due to the proposed driveway resulting in the loss of soft landscaping as well as the impact on highways safety (discussed further below). Whilst the application site differs from no. 122 in that the proposal here resulted in the loss of all soft landscaping, it is clear that the Inspector place significant weight to the value of the soft landscaping in the street scene. The proposed development will see the front boundary wall and mature hedge being removed which are in the most prominent position and add the most value to the street scene. Some landscaping will remain but it will not have the same impact as the landscaping that is there currently.

The introduction of hardstanding and loss of soft landscaping in front of the application site would detract from the character and amenity of the wider street scene. The proposal is therefore contrary to Policies CS12 and CS19 Local Plan Core Strategy 2014, Design for Gravesham (2024), Householder extensions/Alterations Design Guide (2021) supplementary Planning Document, GBC Front Driveway Guidance 2023 and Para 135 (a) of the National Planning Policy Framework 2024 Achieving Well-Designed Places.

Amenity

Future Occupiers

The proposal would not result in any harm to the amenity of future occupiers of the property. As such in respect of amenity of future occupiers the proposal is considered to comply with SPG2 and Policy CS19 of the Local Plan Core Strategy 2014.

Neighbouring Amenity

The proposal would not result in any harm to the amenity of occupiers of surrounding properties. There would be no loss of sunlight, overlooking, overbearing or loss of outlook as a result of the proposal. As such in respect of amenity of occupiers of neighbouring properties.

Therefore, in terms of neighbouring amenity, the proposal would accord with the objectives of Policy CS19 Local Plan Core Strategy 2014 and paragraph 135f of the National Planning Policy Framework (NPPF) (2024).

Ecology and Biodiversity

Policy CS12 of the Gravesham Core Strategy 2014 states that there will be no net loss of biodiversity in the Borough. The proposal will result in the front hedge being removed and the lawned area. The northern boundary hedge will remain and a new planted area will be made under the bay window which is currently tiled. In biodiversity terms the loss, on balance, is mitigated by the new planting area however, in terms of character and appearance the loss of unacceptable as discussed in the 'Design, Character and Appearance' section above.

Parking and Highways

Paragraph 115(b) of the NPPF 2024 requires new development to ensure that safe and suitable access can be achieved for all users and paragraph 116 sets out that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety. Policy CS11 (Transport) of the

Gravesham Local Plan Core Strategy September 2014 sets out that new developments should mitigate their impact on the highway. Saved Policy T5 of the Gravesham Local Plan First Review November 1994 indicates that the formation of new accesses to classified roads will not normally be permitted except where no danger would arise.

The application site is located along a busy road where there is on street parking directly opposite and to the south. There are double yellow lines in front of the dwelling and parking bays to the north. A similar application was made for a dropped kerb at number 122 Singlewell Road (20050819) which was refused for the following reasons:

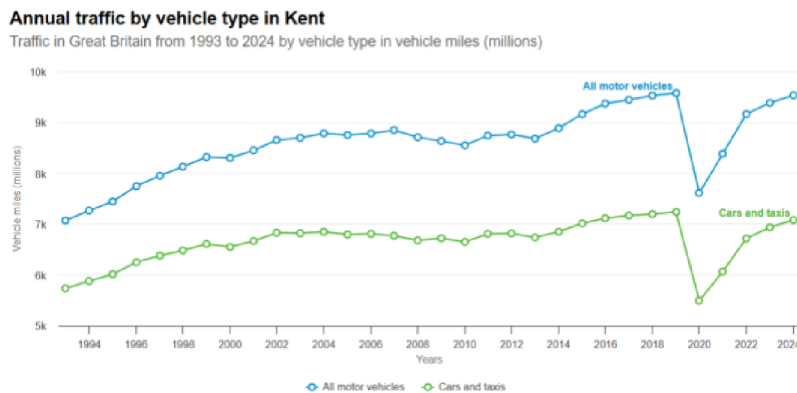
- 1 The proposed vehicular access in this location would not satisfactorily meet the required standard for both highway and pedestrian visibility, the proposal is therefore contrary to highway and pedestrian safety and contrary to policy T5 of the Gravesham Local Plan First Review and policy T12 of the Gravesham Local Plan Second Review Deposit Version and the Council's Planning Guidance Note No 6 Planning Policy for Vehicular Accesses to Classified Highways adopted as supplementary planning guidance
- 2 The property is located within a section of Singlewell Road between Cross Lane East and Ferndale Road where there is a total absence of vehicular accesses and where on-street parking is highway and the free flow of traffic is restricted due to such parking and the road alignment, if permitted the proposal would result in a serious precedent which would make it difficult to refuse similar such accesses and would lead to further hazards due to vehicles reversing out on to the flow of traffic and would be detrimental to local amenity
- 3 The proposed access would result in the removal of the front garden wall and hedging and the paving of the entire front garden, this would fail to respect the character and appearance of the building and the currently uncluttered appearance of this existing terrace of dwellings, the proposal would therefore be contrary to policy TC1 of the Gravesham Local Plan First Review and policy BE12 of the Gravesham Local Plan Second Review Deposit Version

The application was dismissed at appeal (APP/K2230/A/06/2008466 – appendix 1). The Planning Inspector made the following points:

- This part of the road is 'part of a heavily used local distributor route helping to link Gravesend town centre with residential areas and the A2 further to the south'
- 'There are double yellow lines immediately outside the appeal site but to the north of this there is on street parking available on the eastern side of the street'. 'There is similar on road parking on the opposite side of the street' and 'this effectively reduces the carriageway to single vehicle width'
- 'Any vehicle parked at the appeal site would therefore have to reverse into or out of the carriageway where visibility and the flow of traffic are already restricted'
- 'such a manoeuvre would be inherently unsafe. This would be so to an appreciably greater degree than merely parking in the street, which would be a loss unexpected movement for other motorists to perceive.'
- The proposal 'would be contrary to policy T5'.
- The low boundary wall, prominent hedge and lawn behind are features that 'give a sense of enclosure and visual interest to the street scene, which is a characteristic of the terrace as a whole. Shrubs and plants are present in many front gardens, which enhance the street scene'. The proposal would result in an uncharacteristic open frontage apparently devoid of vegetation where even on parked car would result in a cluttered appearance'.
- 'As a consequence the scheme would harm the street scene and the character and appearance of the terrace and locality'.
- With regards to dropped kerbs in the wider area he states 'I do not consider that such examples of disharmonious development should be used to justify additional works that would result in the harmful effects that I have found'.

Despite this decision being made in 2006, the road is still heavily used and the road markings remain the same. The policies relied upon in this decision have not changed and, if anything, the number of cars using this road and parking along it has increased since this appeal was dismissed.

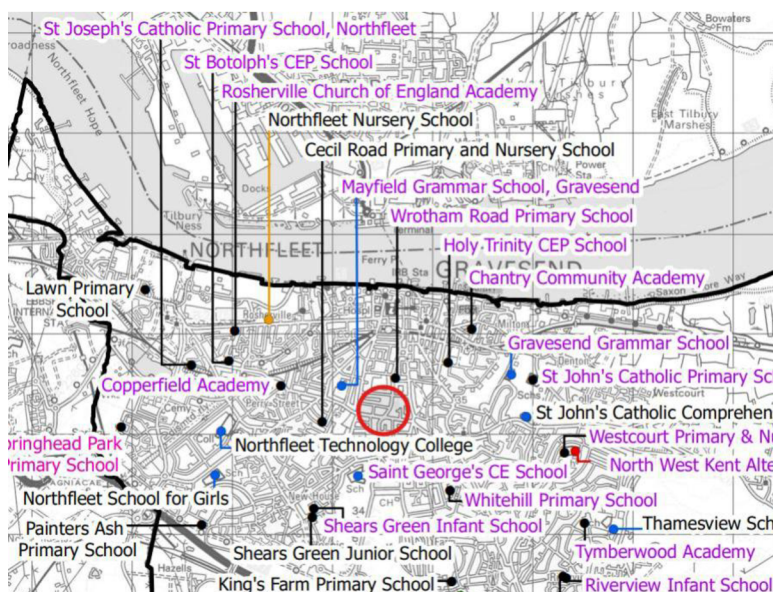
The below graph shows annual traffic levels between 1994-2024. The graph clearly shows that there has been a steady increase in traffic over time, except during the covid pandemic where there was a sharp drop off, however since the pandemic traffic volumes have rebounded and continue to steadily increase¹.



From the above information we can appreciate that Singlewell Road is a very busy Classified Highway which requires the free flow of traffic. The vehicle parked on the property frontage is most likely to be used during peak traffic hours which would hinder the free flow of traffic as a result of movements on and off the site. Given that there is no onsite turning available the vehicle would either enter or exit the drive in a reverse gear which is particularly dangerous to other road users and pedestrians. The parked cars to both sides of the road restrict the available width and reversing onto this would seriously compromise the flow of traffic and highway safety.

Singlewell Road is also located close to several local schools and therefore there are large numbers of students commuting on foot. Any reduced visibility from neighbouring walls to parked cars, especially if the vehicle is having to reverse onto the highway, poses a significant danger to the safety of pedestrians.

The below image indicates the approximate area of the application site and its proximity to nearby schools:



The position of the proposed drive at 110 is the same as 122 in that any vehicle using the drive would have to reverse on or off where visibility is restricted. As the inspector found in the above appeal, such a manoeuvre would be inherently unsafe. The inspector went on to say that even if the necessary sight lines could be achieved it would not have overcome the safety concerns he had.

¹ <https://roadtraffic.dft.gov.uk/local-authorities/80> Road traffic statistics - Local authority: Kent

Interestingly the Inspector considered the consultation response of the Highway Authority but took a different view than the County Council in respect of highway safety. This was also the case for an appeal at 241 Wrotham Road (APP/ K2230/D/25/3360751 – appendix 2) where the Highway Officer did not object but the Inspector was clear that the proposed driveway on this main distributor road would raise serious highway safety concerns. In the case of the application site, and due to recent situations where driveways have been allowed at appeal but not allowed by the County Council, the view of the dropped kerb team were sought. They have raised highway safety concerns should a vehicle exit the property in reverse and therefore approval would be subject to an inspection by a KCC officer and is not guaranteed. They also state that the applicant will need to demonstrate visibility splays can be achieved. A KCC drainage asset is also within the vicinity of the drive and therefore this will need approval from the local drainage engineer.

The County's Residential Dropped Kerb Guidance and Self-Assessment (April 2025) states on page 6 that:

Footway Visibility - For pedestrian visibility, a splay of at least 2m x 2m with a maximum height of 0.6m from the back of footway will be required. Greater visibility may be required on faster and busier roads and therefore your application will be assessed on site specific criteria. There should be no obstruction to visibility (walls, vegetation, fencing, etc) over the height of 0.6m above footway level.

Carriageway Visibility - Sight lines are defined by the visibility setback (the X dimension) and the forward visibility required enabling a vehicle to stop safely (the Y dimension). Where it is in the applicant's control, the following minimum requirements should be satisfied: Carriageway visibility X-dimension 2.4m from back of carriageway Y-dimension: based upon the following speed limits:

20 MPH	25m
30 MPH	43m
40 MPH	149m
50 MPH	160m
60 MPH	203m

The KCC Residential Dropped Kerb Guidance and Self-Assessment 2025 sets out that a driveway should incorporate 2 metres x 2 metres pedestrian visibility splays on either side, where there can be no obstruction in excess of 0.6 metres height (pedestrian visibility) and incorporate appropriate sightlines according to the speed limit of the road (carriageway visibility). For a 30 mile per hour road, the carriageway visibility should be measured from a point 2.4 metres from the back of the carriageway for a length of 43 metres.

The plans clearly show that 2m x 2m visibility splays and the relevant sightlines cannot be provided. This layout would therefore be detrimental to pedestrian visibility and undermine highway safety by virtue of increasing the potential for hazardous manoeuvres, which would cause dangers to passing pedestrians.

The site is in a sustainable location within walking distance to the town centre, close to shops and served by a bus route. The requirement for off road parking if this were a new-build property would not apply in this location.

The Kent Design Guides (2006) states:

'Pedestrians walking (and children riding) along a street, whether on a footway or a shared surface, should not be hidden from the view of drivers emerging onto that street from driveways. This "pedestrian visibility" has historically been provided as triangular splays on both sides of the driveway, starting at 2.4m by 2.4m but reducing some years ago to 2.0m by 2.0m'.

As already stated the application site cannot provide visibility splays of 2m x 2m. In addition to this, there are parked cars directly outside to the south which further impede visibility.

The proposed vehicular access and front garden hardstanding would pose a significant highway hazard on highway and pedestrian safety due to vehicles reversing into the busy highway. Movements on and off the driveway would also impact the free flow of traffic on this busy road. As such the proposal would be contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy, September 2014, saved Policy T5 (New Accesses onto Highway Network) of the Gravesham Local Plan First Review 1994 and Design for Gravesham (2024) and paragraphs 115 and 116 of the National Planning Policy Framework 2024.

The applicant's Planning Statement shows accident data for the past 5 years for Singlewell Road and shows that accidents have occurred mainly at junctions. It is noted that there are no dropped kerbs along the section of Singlewell Road from Cross Lane East to Ferndale Road and therefore there would be no crash data relating to driveways. The lack of crashes along a road to date is not a reason to allow hazardous development.

The Statement also refers to Manual for Streets and relies on its statement at paragraph 9.10.3 that frontages have 'no simple statistical relationship between the number of collisions and the number of vehicular connections in the form of minor junctions and direct accesses.' This is a sweeping statement and does not take into account the situation on the ground. Each application shall be dealt with on a case by case basis and on its own merits. In this case, the site is located on a terraced plot, along a road which is single width road due to parked cars, close to road junctions and within close proximity to schools and shops.

The proposed development, due to its location on a heavily trafficked road with on street parking on both sides, raises significant highway safety concerns and is therefore contrary to Saved Policy T5 of the Gravesham Local Plan First Review 1994 which states that new accesses to classified roads will not normally be permitted, except where no danger would occur, Policy CS11 of the CS which requires new development to mitigate their impact on the highway and paragraphs 115 and 116 of the National Planning Policy Framework which states planning permission should be refused if there is an unacceptable impact on highway safety. The proposal does not satisfy these requirements and so would be contrary to the development plan.

Conclusion

1. The introduction of hardstanding and loss of the front hedge and grass area would result in an uncharacteristic open frontage that would detract from the character and amenity of the terrace and wider street scene. The proposal is therefore contrary to Policies CS12 and CS19 Local Plan Core Strategy 2014, Design for Gravesham (2024), Householder extensions/Alterations Design Guide (2021) supplementary Planning Document, GBC Front Driveway Guidance 2023 and Para 135 (a) of the National Planning Policy Framework 2024 Achieving Well-Designed Places.

2. The proposed vehicular access and front garden hardstanding would pose a significant highway hazard on highway and pedestrian safety and the free flow of traffic on this busy classified road and which is a main route to the town centre. As such the proposal would be contrary to Policy CS11 (Transport) of the Gravesham Local Plan Core Strategy, September 2014, saved Policy T5 (New Accesses onto Highway Network) of the Gravesham Local Plan First Review 1994, Design for Gravesham (2024), Householder Extensions/ Alterations Design Guide (2021) supplementary Planning Documents and paragraphs 115 and 116 of the National Planning Policy Framework 2024.

Recommendation:

Refuse

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

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
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Signed:		Signed:	
Dated:	16 September 2025	Dated:	16th September 2025