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24<sup>th</sup> November 2022

Gravesham Borough Council  
Planning Department  
Civic Centre  
Gravesend  
Kent DA12 1AU

Dear Sir/Madam

**A21360 – Marling Way, Gravesend**  
**Our reference – A21360/221124/GBC/SJB**

On behalf of our Clients, Mr and Mrs D. Partridge and Mr and Mrs J. Cassidy, the owners of 122 Marling Way Gravesend, Kent DA12 4RE, we confirm the submission online today of a Full planning application, Planning Portal reference PP-11715818, for the erection of a new dwelling, the consequent external alterations and incidental minor internal ground and first floor alterations to the existing property, and associated external works and car parking provision, comprising in addition to this covering letter:

- Completed application form,
- 221124 1000 Location Plan,
- 221124 1001 Existing Site Block Plan Rev A,
- 221124 1001A Existing Site Block Plan (Services),
- 221124 1010 Existing Ground Floor Plan,
- 221124 1011 Existing First Floor Plan,
- 221124 1020 Existing Section AA,
- 221124 1021 Existing Section BB,
- 221124 1030 Existing North Elevation,
- 221124 1031 Existing South Elevation,
- 221124 1032 Existing East Elevation,
- 221124 1033 Existing West Elevation,
- 221124 1100 Public Sewer Diversion,
- 221124 1101 Proposed Site Block Plan Rev A,
- 221124 1101A Proposed Site Block Plan (Services) Rev A,
- 221124 1110 Proposed Ground Floor Plan Rev A,
- 221124 1111 Proposed First Floor Plan Rev A,
- 221124 1120 Proposed Section AA Rev A,
- 221124 1121 Proposed Section BB,
- 221124 1130 Proposed North Elevation,

- 221124 1131 Proposed South Elevation,
- 221124 1132 Proposed East Elevation,
- 221124 1133 Proposed West Elevation,
- 221124 220714 Southern Water, and
- 221124 Form 1 CIL Additional Information Completed.

This application follows an earlier full planning application for this property, reference 20221024, for which planning consent was refused on 17<sup>th</sup> November 2022. The stated reasons for this latter refusal comprise:

*1. The proposed dwelling is inappropriate development on a corner plot which disrupts an established building line and develops a planned open area within the street scene which is a characteristic of the surrounding estate. Therefore the development is harmful to, and erodes the openness of the street scene, contrary to Policy CS19 (Development and Design Principles) of Gravesham's Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2021).*

*2. The development proposal represents overdevelopment of the site and fails to safeguard the amenity of occupiers by providing undersized, cramped and poor quality accommodation that future residents could expect to enjoy, and substantially and detrimentally reducing the garden area of the host dwelling. The new dwelling and alterations to the existing property fail to comply with recommendations in the Nationally Described Space Standards (2015) and Gravesham's Residential Layout Guidelines (2020), and is therefore contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (2014) and Section 12 of the National Planning Policy Framework (2021).*

*3. the proposed driveway is undersized by virtue of the inward opening gates, represents a risk to pedestrian safety and increases the potential for vehicular collisions by providing substandard visibility splays and the cycle store is an inappropriate under provision located internally, under the stairs. Therefore, the proposal is contrary to Policies CS11 and CS19 (LPCS), saved policy P3 (LPFR), SPG 4: Gravesham's adopted parking standards SPG4 (2006), Department for Transport's Manual for Streets (2007), Kent County Council vehicle crossing guidance (2022), as well as Sections 9 and 12 (NPPF).*

*4. The proposal fails to safeguard biodiversity and fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment. Therefore, the development fails to comply with the requirements of the Habitat Regulations, Section 15 (specifically paragraphs 180 and 181) of the National Planning Policy Framework (2021) and Policy CS12 of Gravesham's Local Plan Core Strategy (2014).*

In respect of Item 1, the section of the Delegated Report, 'Design, Character and Appearance', that appears to form the basis of this reason for refusal recognises that the 'open area' has been eroded by the two-storey extension to 120 Marling Way but, somewhat disingenuously, does not refer to the many comparable side extensions that have been granted far more recently than 1967.

Examples of relevance include the medium to large scale width two-storey side extensions at 75 Marling Way (20160898), 175 Marling Way (19930579), and, albeit to a lesser extent, 185 Marling Way (19960679). Within the immediate wider context, further examples include 64 Frobisher Way (19950286), 1 Tamesis Strand (20200396), 19 Latona Drive (20171148), 90 Leander Drive (20161156), 1 Windhover Way (20050699), 2 Windhover Way (19880906), 5 Sara Park (19930008), 19 Sara Park (20150643), and 54 Cimba Wood (20020760).

There are numerous other comparable examples, to the extent that such development has become a characteristic of, and not harmful to, the local street scene, and this broader review could and should have informed the assessment of the previous application.

It is clearly not considered that the proposed dwelling is inappropriate development as it comprises a simple extension of an existing terrace, wholly consistent with the many comparable precedents, and, as an independent dwelling, need not and should not be subservient to the existing buildings, as would be appropriate for a side extension of an existing dwelling.

In respect of Item 2, the section of the Delegated Report, 'Amenity of Future Occupiers', that appears to form the basis of this reason for refusal inconsistently considers the properties to be two- or three-bedroom dwellings to suit the respective conclusions. The previous application clearly indicates that both the existing and proposed dwellings are two-bedroom dwellings and, irrespective of the statement that "*the property is listed as a three bedroom dwelling on sales history and an investigation of the planning history of other properties on the terraces (nos. 124 and 126) demonstrate that these are three bedroom properties.*", the assessment of the previous application should have been based on current national and local planning policy space standards, appropriately objective, and not subjective 'hearsay', criteria.

For the avoidance of doubt, this current application comprises internal alterations to the existing dwelling and a similar internal layout for the proposed dwelling that wholly meets and exceeds national and local planning policies for both internal spaces and external amenity space.

In respect of Item 3, the comments made in response to the previous application have been noted and the current proposals are wholly compliant with current county and borough council Highways requirements, with commensurate dedicated off-street car parking and cycle storage, and occasional visitor car parking provided by the existing unrestricted on-street parking.

In respect of Item 4, and despite clearly stating in the application that "*an agreement and contribution of £275.88, secured by planning condition, will be provided by the applicant and a screening for Appropriate Assessment (AA), if necessary, will be undertaken at the appropriate time*", no approach by Gravesham BC was made to the applicant during the course of the planning application to formalise this agreement. The applicant has therefore separately and independently submitted the respective SAMMS payment application in support of this subsequent planning application.

The proposed new dwelling comprises a simple and sympathetic extension of the existing terrace of dwellings, substantively replicating both the internal configuration, with minor alterations to the existing property and respective variations to the proposed property due to current statutory residential requirements, and the external form, materials and detailing of these existing properties, on a proposed newly independent site, currently forming part of a larger residential curtilage, enabled and created by a Southern Water agreed diversion of an existing public foul water sewer.

The proposed development is wholly compliant with national and local planning policy, with no detrimental impact on any adjoining property and, as such, should therefore be granted planning consent. Given the revisions to the proposed development, it is also considered that a further refusal of this current application on similar grounds to those of the previous application is not likely to be viewed favourably by the Planning Inspectorate.

Should there be any queries or concerns with any aspect of this application, we would be pleased to review the proposed development with yourselves in order to achieve an agreed and acceptable proposal prior to determination.

Given that this application is being submitted following the refusal of the Full Planning application, reference 20221024, comprising similar proposals for the same site within twelve months of the date of this refusal by the same applicant, no fee for this application is therefore due.

We would be pleased to receive the following from you:

- Confirmation of receipt of this application, its validity, registration and that no further information is required,
- Confirmation that no planning application fee is due,
- Confirmation of the timescale for the determination of this application.

We look forward to your acknowledgement of receipt of this application at your earliest convenience.

Yours faithfully



Steve Baker  
BA(Arch)(Hons) B.Arch(Hons)(Reilly) ARB RIBA

Principal

For and on behalf of Steve Baker Architect

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cc – Mr and Mrs D. Partridge  
Mr and Mrs J. Cassidy  
Enc

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