

Delegated Report

Householder Planning Application

Planning Application No: 20260632

Location: 50 Whitehill Road Gravesend Kent DA12 5PG

Description: Change of Use from a small HMO (Use Class C4) 6 persons to a large HMO (Sui Generis) for 7 persons.

Applicant: Richard Marshall

Site Visit Date: Previous Visits

Submitted Documents/Plans

Application Form
999-LP – Location Plan
999A-SP – Existing Site Plan
000-EP – Existing Floor Plans
020A-EE – Existing Elevations
Rev 01 – Proposed Floor Plans
020B-EE – Proposed Elevations
Planning Statement
HMO Management Plan
Flood Risk Assessment
Fire Safety Statement

Relevant Planning History

Reference	Description	Decision	Decision Date
20251255	Change of use from a small house in multiple occupation (Use Class C4) to an 8-bedroom, 8-person, large HMO (sui generis) and provision of bicycle and bin stores to the rear.	Refused (Appeal in progress)	09.04.2026
20250220	Application for a Proposed Lawful Development Certificate; single storey rear extension and loft conversion with rear/side dormer. Change of use from C3 dwellinghouse to C4 HMO.	Certificate Granted	02.05.2025

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings

As set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012 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

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 (2026), the Council will also seek to replace these.

National Planning Policy Framework (2026)

- Section 3 – Decision-making policies
- Section 4 - Achieving Sustainable Development
- Section 12 – Making Effective use of land
- Section 14 – Achieving well-designed places
- Section 15 – Promoting Sustainable Transport
- Section 17 – Pollution, public protection and security
- Section 19 – Conserving and enhancing the Natural 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)
- Design for Gravesham – Design Code (2024)
- Guidance for HMO Amenity Standards (2026)

Emerging Local Plan as a Material Consideration

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (Planning and Compulsory Purchase Act 2004) and section 70(2) of the Town and Country Planning Act 1990 (Town and Country Planning Act 1990) make it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise.

Decision Making Policy DM4 of the Framework sets out that when considering development proposals, relevant policies may be given weight, however, this is subject to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement, the Court found that the weight to be given to an emerging Local Plan was a matter of planning judgement, which had to be reached having fully considered the relevant part of the Framework, which from 17 August 2026 Decision Making Policy DM4 of the Framework.

The Council's emerging Local Plan has reached the Regulation 19 Consultation stage, with the consultation having ended on 18 August 2026. The emerging Local Plan does not form part of the Development Plan.

The Council is aware that third parties have raised objections to the wider emerging Local Plan and specific policies within it. Therefore, at present the Council cannot categorically state that the emerging Local Plan can be considered sound and consistent with the National Planning Policy Framework (2024) [as an emerging Local Plan being brought forward under the legacy system, it would be examined under the 2024 Framework]. Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan.**

This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Private Sector Housing

Thank you for your recent consultation request in regard to the above-mentioned proposal. Where the HMO is the applicants preferred option, the team welcomes a conversation or site visit to the premises to discuss licencing requirements. Private Sector Housing is happy with the proposed application.

Kent Police Designing Out Crime Team

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme;

1. Perimeter, boundary and divisional treatments must be a minimum of 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.
2. We advise against the use of parking courts as they can create an opportunity for crime.

Where unavoidable, the areas must be covered by natural surveillance from an “active” window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.

3. Any pre-existing and new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than “round shaped” trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

4. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) Guide 2025 states: “19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light

Neighbouring properties

6no. surrounding properties were consulted and 1 comment was received objecting to the scheme. The final date for submission of comments ended on 4th September 2026.

Summary of objection:

- Follows a recent refusal – What has materially changed that makes the proposal acceptable?
- Impact on residential amenity
- Impact on character of area.
- The assessment should be made against the actual cumulative circumstances of the site and surrounding neighbourhood rather than an increase of one occupant.

Officer's Analysis

Proposal

This application seeks planning permission to change the use of 50 Whitehill Road from a six person HMO (Use Class C4) to a seven person HMO (sui generis). The plans show seven single-occupancy bedrooms, a separate lounge and a communal kitchen/dining area. No extension or external alteration to the building is proposed.

The application follows the refusal of planning ref. 20251255, which proposed an eight bedroom, eight person HMO. That proposal was refused for the following reasons:

1. *The proposal is considered to be overdevelopment of the site, by virtue of the intensification of the use of the property by significantly increasing the number of occupants within the existing HMO in an area characterised by single-family dwellings, introducing an excessive number of occupants and activity over and above the surrounding residences, detrimentally impacting the amenity of surrounding residents through noise, disturbance and increased activity. Therefore, the proposal is contrary to Policies CS14 and CS19 of the Gravesham Local Plan Core Strategy (2014), Saved Policy H5 of the Local Plan First Review (1994) and Section 12 of the National Planning Policy Framework (2024).*
2. *The proposal fails to safeguard the amenity of future occupants due to the intensification of the use of the site, and its altered layout which results in undersized bedrooms, lack of communal areas and unsafe escape routes. The application is therefore contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 and Section 12 of the*

NPPF (2024).

3. *The applicant has failed to provide any ecological evidence to inform a habitat regulations assessment to address the impact of the proposed development on the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) or offered a financial contribution towards the identified mitigation measures to address the impact of the development on the SPA/Ramsar site. The proposal is therefore contrary to Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy (2014) which seeks to ensure that detrimental effects on the integrity of SPA/Ramsar sites are avoided, and also contrary to Paragraphs 192 and 193 of the NPPF (2024), and the requirements of the Conservation of Habitats and Species Regulations 2017.*

Principle of Development

Policy S4 of the National Planning Policy Framework (NPPF) (2026) sets out that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) also supports development in such matters.

The principle issues in determining this application are as follows:

- Housing Need
- Suitability for Conversion
- Design
- Amenity of Future Occupiers
- Residential Amenity
- Parking and Highways
- Waste and Refuse

Housing Need

The Local Plan Core Strategy was adopted by the Council in September 2014 and is more than five years old. Local housing need is therefore calculated using the Government's Standard Method, establishing a baseline requirement of 687 dwellings per annum.

The Housing Delivery Test (HDT), published by the Government on 17 August 2026, sets out that the presumption in favour of sustainable development applies within the Borough. National decision-making policy S3 of the Framework sets out that decisions on development proposals should apply a presumption in favour of sustainable development, as follows:

National decision-making policy S4 of the Framework should be applied when considering development proposals within settlements;

National decision-making policy S5 of the Framework should be applied when considering development proposals outside settlements; and

In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies of the Framework are to be approved without delay.

The Council's most recent Five-Year Housing Land Supply Statement, covering the period 2025-2030, identifies a deliverable supply of 2,053 dwellings against a buffered requirement of 4,056 dwellings (based on the 2025 outcome of the standard method). The Council is therefore currently unable to demonstrate a five-year supply of deliverable housing land. This position equates to a housing land supply of 2.53 years.

National decision-making policy HO7 sets out that substantial weight should be given to the benefits of

providing homes which will contribute towards meeting the evidenced accommodation needs of the community, taking into account evidence produced for the Council e.g. a local housing needs assessment, and the needs for different groups.

The proposed development is for a net increase of two bedrooms from the approved HMO. However, HMOs cannot be counted as net additional dwellings. A House of Multiple Occupation would only contribute towards the local housing need if the HMO were created by change of use from a non-residential building. As such the application does not affect the five-year housing supply.

Suitability for Conversion

Adopted Policy CS14 (Housing Type and Size) (LPCS) provides protection for existing housing stock by seeking to prevent the conversion of family sized units to smaller properties. In line with Policy DP3 of the NPPF (2026), it also stipulates that new housing development is expected to provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Policy CS14 (LPCS) is supported by saved Policy H5 of Gravesham's Local Plan First Review (LPFR) (1994), which seeks to accommodate the growing number of smaller households and provide low cost accommodation, while taking into consideration the character and amenity of existing housing areas where single family occupancy is the norm.

Policy H5(i) states that buildings shall be in an appropriate area for conversion to flats, maisonettes, bedsits and multiple occupancy. It also notes that, unless there are special or overriding circumstances, conversion will not normally be permitted in an area comprised for the most part of single family dwellings. Policy H5(ii) requires that the building shall be of such a size and arrangement as to be generally unsuitable for single family occupancy. A larger house under this policy is considered to be in excess of two storeys in height and to have more than six habitable rooms.

The application property is located within the urban boundary of Gravesend, near to Whitehill Lane, which links to Valley Drive and is an arterial road towards the A2. There are bus routes into the town centre and a small parade of shops nearby on Whitehill Parade. The property is approximately 1.2 km from the town centre, railway station and larger amenities such as supermarkets and banks.

Although the site has already utilised permitted development rights for a change of use to an HMO for six people, and this application seeks to intensify that use further, the starting point is that the property is not considered too large for single family occupancy. The proposal would accommodate seven independent occupants within the property. The reduction of one occupant compared with the previously refused scheme does not alter the fact that the building is of a size and arrangement suitable for a single family. The further intensification of its lawful HMO use is therefore contrary to saved Policy H5(ii).

As noted above, the site is approximately 1.2 km from the town centre and occupiers may use a car or public transport to access larger amenities, including supermarkets, banks and the railway station. There is a bus stop approximately four minutes' walk from the property at Echo Square, with a regular service to Gravesend town centre. There are also shops at Whitehill Parade and Echo Square. Given that the property is already in use as an HMO for six people, the addition of one person is unlikely to make a significant difference to the suitability of the location. The site is therefore considered to be in a sustainable location for the proposed use, having regard to Policy TR3 of the NPPF (2026).

The building is not generally unsuitable for single family occupancy, as required by saved Policy H5(ii). The proposal would intensify the use of a standard townhouse to accommodate seven independent people within an area characterised predominantly by single family dwellings. It is therefore contrary to saved Policy H5. The extent of harm arising from that conflict, including the effect on the character of the area and neighbouring amenity, is considered in the following sections. Refusal Reason 1 of the previous decision notice therefore remains unresolved.

Design, Character and Appearance

Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy requires development to be visually attractive and locally distinctive, and to conserve and enhance the character of the surrounding area. Policy DP3 of the NPPF (2026) seeks development that responds positively to local character and contributes to the quality of the built environment.

The application site is within a predominantly residential area of two storey properties set behind front gardens and parking areas. The surrounding area is suburban in character and consists principally of single family dwellings.

The property is already in use as a six person HMO. The proposal would increase occupancy to seven people which would result in increased levels of activity, over and above what is typical from a single-family dwelling and could be considered out of character with the surrounding area. The effect of that activity on the character of the area and neighbouring residents is considered separately below. No external alterations are proposed, so the development would not change the visual appearance of the building or the street scene. In visual design terms, the proposal accords with Policy CS19 of the Gravesham Local Plan Core Strategy and Policy DP3 of the NPPF (2026).

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy (2014) requires new development to be located, designed and constructed so as to safeguard the amenity of future occupiers, including in respect of privacy, daylight and sunlight. Policy L2 of the National Planning Policy Framework (2026) requires sensitive redevelopment and additional development within existing plots to maintain acceptable living standards for residents in terms of access to daylight, sunlight, privacy and external amenity space. Policy P3 further requires development to provide healthy living conditions for occupiers, including adequate access to light.

The LPA's Guidance for HMO Amenity Standards (2026) sets out the expected bedroom sizes and communal facilities for this type of accommodation.

The previous application proposed eight bedrooms and the loss of communal living space. Private Sector Housing raised concerns that some bedrooms would be undersized without that space. The current proposal is for seven bedrooms and retains a separate lounge, together with a communal kitchen and dining area. Each bedroom shown on the revised plans exceeds the minimum size for a single occupancy bedroom in the HMO guidance. The lounge measures approximately 10.2 square metres, which is below the 17 square metres suggested by the guidance for seven occupants. However, residents would also have use of the communal kitchen and dining area, which measures approximately 18.5 square metres. Private Sector Housing has reviewed the current proposal and advised that it is happy with the application. Private Sector Housing had also objected to the previous application because one bedroom led directly from the communal kitchen, making the kitchen the primary means of escape for its occupant. That bedroom is no longer proposed in this location; the space is shown as the communal lounge. The specific concern raised about that bedroom therefore does not arise under the current layout.

The property has a rear garden which residents can access from the communal kitchen without passing through an individual bedroom. This provides outdoor amenity space for future occupants.

Overall, the revised layout addresses the concerns raised about the living conditions under the previous application. While the separate lounge is smaller than the size suggested in the HMO guidance, it would be in addition to the communal kitchen and dining area, and Private Sector Housing has raised no objection to this latest proposal. On balance, the accommodation is considered acceptable for future occupants in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and Policy P3 of the NPPF (2026). Refusal reason 2 of the previous application is therefore overcome by the submitted application.

Neighbouring Amenity

Policy CS19 of the Gravesham Local Plan Core Strategy requires development to safeguard the amenity of neighbouring properties. Policy P3 of the NPPF (2026) requires proposals to avoid or mitigate unacceptable noise impacts on surrounding residents. As outlined above, it is important that any development safeguards the amenity of neighbouring properties and land. Following a period of consultation with neighbouring properties, 10 comment from members of the public were received, objecting to the scheme. However, given the similarity of the proposed scheme to the previous refused one it is also important to note the contextual information and concerns raised by the 38 objections submitted on that application.

No extensions or external alterations are proposed. The development would therefore not cause harm to neighbouring properties through overshadowing, overlooking or loss of outlook. The main consideration is whether the proposed use would increase noise and disturbance.

The property can lawfully accommodate six people as a HMO. The current application would increase this to seven independent occupants. Although this is one fewer than the previously refused scheme, it would still intensify the use of a standard townhouse within an area characterised principally by single family dwellings. The additional occupant would be likely to increase the frequency of comings and goings and the use of shared areas, including the rear garden.

Representations concerning the existing six person HMO, in the previous application have described noise and disturbance associated with its operation. These concerns provide context for assessing the impact of the proposed increase in occupancy. While the effect of one additional resident cannot be calculated precisely, the proposal would allow seven people to occupy the property independently, each with their own pattern of activity. In the circumstances of this site, the reduction from a proposal for eight to seven occupants does not overcome the concern identified in the previous decision about the effect of further intensification on neighbouring residents. These represent more movements than would be reasonably expected from a single-family dwelling.

It is therefore considered that the proposed use would cause unacceptable noise and disturbance to neighbouring occupiers, contrary to Policy CS19 of the Gravesham Local Plan Core Strategy, saved Policy H5 of the Gravesham Local Plan First Review and Policy P3 of the NPPF (2026).

Parking and Highways

Saved Policies T1 and P3 of the Gravesham Local Plan First Review and Policy CS11 of the Gravesham Local Plan Core Strategy seek to ensure that development has acceptable transport and parking arrangements. Policies TR4 and TR6 of the NPPF (2026) address parking provision and the assessment of transport impacts.

The current proposal would increase the lawful HMO occupancy from six to seven people. The property has no off-street parking, and none is proposed. Any additional resident who owns a car would therefore rely on on-street parking. Neighbours have previously raised concerns about existing parking pressure, and driveways restrict the amount of space available along Whitehill Road.

The applicant's Planning Statement includes four photographs of nearby streets, dated 26 May 2026, which show some parking available at the time they were taken. These provide limited evidence of parking conditions, as they do not show availability at other times, particularly overnight. No parking survey has been submitted. The application form also proposes eight cycle spaces, which could be detailed by condition.

It is noted that some properties along this road do have driveways and so whilst parking is unrestricted the presences of driveways limits on street parking availability somewhat. No parking survey has been submitted by the applicant and so it is difficult to say with any certainty what the status of parking availability is like, particularly during peak hours. It is also noted that Whitehill Road is not a wide road and so parking on both sides of Whitehill road is unlikely to be possible or desirable, as it would cause obstruction for passing vehicles. However, Coombe Road and Laurel Avenue do appear to be wider and there

may be more parking spaces available at these locations. Albeit Google Maps and a general visit to the area would indicate that the availability of parking spaces is somewhat limited.

Ultimately, the extent of the change must be considered, and how that would impact the parking situation. This application would increase the number of occupiers by 1. Therefore, potentially resulting in an increase of 1 no. vehicle. Whilst no parking survey has been provided, the impact of 1 vehicles in this location, where on-road parking would potentially be available, is unlikely to harm the functioning of the local highway network.

The development is therefore considered acceptable in parking and highway terms, in accordance with saved Policies T1 and P3, Policy CS11 and Policies TR4 and TR6 of the NPPF (2026).

Waste and Refuse

The current application includes a HMO Management Plan which states that refuse and recycling would be kept in a designated area within the site boundary. Residents would be given instructions on separating waste and presenting bins for collection, and the managing agent would check the storage area regularly.

The revised plans do not identify a bin store or specify the number and size of bins required for seven occupants. The proposal would generate more waste than the existing lawful six person HMO, so suitable storage would be needed to prevent bins or loose waste affecting the appearance of the property and surrounding area.

There appears to be sufficient space within the site to accommodate the necessary bins. If permission were granted, a condition could require details of their number, size, location and any screening, together with arrangements for presenting them for collection. Subject to those details, the proposal would be acceptable in waste and refuse terms in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy.

Special Protection Area (SPA) and SAMMS

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 £350.16 for every net increase in bedrooms within a HMO 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.

Where there are no other contributions required for a development applicants generally have chosen to submit the payment of £350.16 per increased bedroom by filling in the Strategic Access Management and Monitoring Strategy (SAMMS) Agreement. By filling in this form there are no legal fees to be paid by the applicant, and refund mechanisms are in place in the event of a refusal.

The proposal would result in one additional HMO bedroom, for which the current SAMMS contribution is £350.16. The applicant has indicated a willingness to pay in their planning statement, but has not completed the SAMMS Mitigation Contribution Agreement or made the required payment.

Policy N6 of the NPPF (2026) states that development affecting a site of international importance should be

refused unless an Appropriate Assessment concludes that it would not adversely affect the integrity of the site, either alone or in combination with other development, or the other requirements of that policy are met.

As the required mitigation has not been secured, the LPA cannot conclude that the proposal would avoid an adverse effect on the integrity of the Thames Estuary and Marshes SPA and Ramsar site. As submitted, the proposal is therefore contrary to Policy CS12 of the Gravesham Local Plan Core Strategy and Policy N6 of the NPPF (2026). Refusal reason 3 of the previous application remains unaddressed.

Conclusion

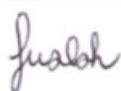
The proposal would result in an over intensive form of occupation within a modest mid terraced dwellinghouse in an area characterised predominantly by single family dwellings. The increase in occupants, activity and associated noise and disturbance would be harmful to the character of the area and the amenity of surrounding residents. Therefore, the proposal is contrary to Policies CS14 and CS19 of the Gravesham Local Plan Core Strategy (2014), saved Policy H5(ii) of the Gravesham Local Plan First Review (1994) and Policy P3 of the NPPF (2026).

The applicant has failed to provide ecological evidence to inform a Habitats Regulations Assessment to address the impact of the proposed development on the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA), or to secure a financial contribution towards the identified mitigation measures. The proposal is therefore contrary to Policy CS12 of the Gravesham Local Plan Core Strategy (2014), Policy N6 of the NPPF (2026) and the requirements of the Conservation of Habitats and Species Regulations 2017.

Recommendation

The recommendation is to refuse this application.

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

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	28th September 2026	Dated:	30 September 2026