

Delegated Report

Planning Application

Planning Application No: 20251046

Location: 40 Cross Lane East, Gravesend, DA12 5HB

Description: Demolition of existing garage, erection of a two-storey side extension, rear dormer and conversion of dwelling (Use Class C3) into a 9 bedroom House in Multiple Occupation (Sui Generis).

Applicant: Mr Singh

Site Visit Date: 20 October 2025

Submitted Documents/Plans

Application form
Planning Statement
Drawing no. 001 rev A (site location and block plans)
Drawing no. 002 rev A (existing floor plans)
Drawing no. 003 rev A (proposed floor plans)
Drawing no. 004 rev A (existing plans)
Drawing no. 005 rev A (proposed elevations)

Relevant Planning History

20250446	Erection of a Single 2-Bedroom Dwelling.	Application Refused, Appeal Dismissed	01.07.2025
20240680	Erection of a building to form 2no. 1 bedroom units.	Application Refused, Appeal Dismissed	21.10.2024
19870391	Erection of single storey side extension to form garage	Permitted	01.07.1987
19860841	Erection of a two storey side extension to form a garage workshop with bedroom over	Permitted	22.12.1986
19750523	Erection of single storey rear extension for shower room and wc and covered walkway at rear and alterations to garage	Permitted	25.09.1975

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development

- CS02 – Scale & Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
- T1 – Impact of Development on the 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 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – 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);
- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006);
- Householder Extensions/Alterations Design Guide (2021); and
- Guidance for HMO Amenity Standards (V2 2023)

Consultations, Publicity and Representations

Consultees

GBC Private Sector Housing

Thank you for your recent consultation request regarding the above-mentioned proposal. Our observations are as follows, in relation to Drawing No 003 Rev A.

Bedroom 3 is located off a high-risk room without a protected means of escape, nor an obvious secondary means of escape. The main means of escape and secondary means of escape are to lead to a place of

safety away from the premise.

Bedroom 9 is located in the converted loft area and, as such, only the floor area which has a ceiling height of over 1.5m can be considered. This double room provides for a bedroom, cooking facilities and an en-suite but no designated living space and measures approx. 12.8sqm. It cannot be considered as benefitting from the communal facilities as these are not 1 floor distance away i.e. the floor below. It therefore falls short of the adopted standards. Discretion could be used to allow 1 occupant

Whilst cooking facilities within Bedrooms is not encouraged, where facilities are provided, they must meet amenity standards in relation to the minimum room size, amenities provided and fire safety standards.

- Both smoke and heat detection required within the bedroom with cooking facilities
- For valuation office purposes all bedrooms will be classed as Rooms and not Flats

Taking into account the above the property would allow for 13 occupants, 8 households (for info only)

Where the HMO is the applicants preferred option, the team welcomes a conversation or site visit to the premises to discuss licencing requirements.

Kent Police Designing Out Crime

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 at the right height to recognise facial features."

Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.

5. If new external doorsets are proposed (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors, we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.

6. If new windows are proposed on the ground floor and any window that is easily accessible on any other level e.g. from flat roofs or balconies, we recommend these to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.

7. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.

8. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.

9. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.

10. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents within the flats.

11. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along with a freestanding post box of SBD/Sold Secure approved Gold standard. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the ground floor to prevent access to all areas.

12. CCTV is advised for all communal entry points and to cover the mail delivery area.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Neighbouring properties

The application has been advertised by site notice and individual letters to nine neighbouring properties.

38 letters of objection have been received. Main concerns:

- Two applications already been refused
- Objective is to cram as many people in as possible for financial gain
- Increased load on already stretched facilities and amenities
- Parking pressure
- No SAMMS payment
- Out of character with the area
- Overdevelopment
- Application is for personal financial gain
- Safety of existing residents and children due to transient occupation
- Family neighbourhood

- There are already three HMOs in the area
- Increase in comings and goings/deliveries etc. resulting in increase in noise
- Loss of privacy
- Insufficient details re. waste storage
- Scale of the extension is out of character
- Will bring down the value of surrounding properties (*not a material planning consideration*)

13 letters of support from eight dwellings have been received. Main points raised:

- Not overdevelopment or a block of flats
- Sustainable location
- Most people that live in HMOs don't have cars and the property has its own driveway
- People need affordable housing
- The location is sustainable
- The HMO will be licenced
- Better for the property to be used than empty

Officer's Analysis

Proposal

This application seeks planning permission for the demolition of existing garage, erection of a two-storey side extension and conversion of dwelling (Use Class C3) into a 9 bedroom House in Multiple Occupation (Sui Generis) for up to 16 people.

The proposed extension will project approx. 3m to the side at the front of the property and 4m to the rear. It will be approx. 7.7m deep and 8.8m high with a pitched roof. There will also be a dormer to the rear measuring approx. 1.6m wide, 2.4m high and 2.6m deep.

Internally there will be three en-suite double bedrooms, a kitchen/living room and dining room at ground floor, two en-suite double bedrooms, one double bedroom, one single bedroom and a bathroom at first floor and one en-suite double bedroom at second floor.

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Carnwath as part of the Supreme Court decision stated,

"It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than "guidance" and as such a "material consideration" for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme."

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year

housing land supply statement in February 2025, it demonstrates that based on data up for the period 2024-2029, the Council can only demonstrate a land supply of 3 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear 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.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, 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.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 129(c)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development for a net increase of six bedrooms from the original property. However, HMOs cannot be counted as net additional dwellings as they would have been counted as a net additional dwellings in a previous year. A HMO would only contribute towards the local housing need if the HMO is created by change of use from a non-residential building. As such the application does not affect the five year housing supply.

Principle of Development

The application site lies within the urban area where the principle of development is acceptable providing it meets the requirements of local and national policy.

Policy CS14 of the Gravesham Core Strategy 2014 relates to housing type and size. This policy states that the Council will protect and mix of housing in the existing stock and will resist the conversion of family sized residential properties to smaller properties. It goes on to say that the Council will expect new housing development 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 balanced communities.

The conversion of this family sized dwelling into an HMO, consisting of seven double rooms and two single rooms with some communal space, will result in the loss of a family dwelling in an area which is characterised by single family dwellings. The proposed development is therefore contrary to this policy.

Policy H5 of the Gravesham Local Plan 1994 states that:

In considering proposals for the conversion of existing properties to provide flats, maisonettes, bedsitters,

hostels, homes and other forms of multiple occupancy, the Borough Council will have regard to the following criteria:-

(i) The building shall be in an appropriate area for conversion to flats, maisonettes, bedsitters and multiple occupancy. Unless there are special or overriding circumstances, conversions will not normally be permitted in an area comprised for the most part of single family dwellings. Conversely, conversions will not normally be permitted in areas which are environmentally unsuitable for young families and which already demonstrate a predominance of multiple occupation.

(ii) The building shall be of such a size and arrangement as to be generally unsuitable for single family occupation.

(iii) The proposal shall have regard to the Borough Council's Residential Layout Guidelines, as set out in supplementary planning guidance.

(iv) The adopted Vehicle Parking Standards must be achieved wherever feasible.

The application site is located within an area comprised for the most part of single family dwellings and therefore this proposal to convert the property into an HMO conflicts with this policy. The building is not of a size and arrangement that is unsuitable for single family occupation and therefore policy supports its retention.

Policy CS15 of the Gravesham Core Strategy 2014 states that all new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. As stated above, the character of the area is single family dwellings and therefore the proposal also conflicts with this policy.

The proposed change of use of this family dwelling to an HMO therefore conflicts with policies CS14 and CS15 of the Gravesham Core Strategy 2014, Policy H5 of the Gravesham Local Plan 1994 and paragraph 135 of the National Planning Policy Framework 2024.

Design, Character and Appearance

The application site is a two storey terrace property with an attached garage and off road parking for two cars. The properties along this side of the road are similar but not uniform. The character of the street scene includes planted front gardens, some with driveways, set back from the road and, with the exception of no. 41 which was built up to the back edge of the pavement, open space to the sides of corner dwellings.

The proposed extension will be built up to the edge of the road which will erode this space. From the rear the side extension will result large expanse of built form when seen from Central Avenue and the rear of the houses on Portland Avenue. The rear dormer is positioned off-centre and does not relate to the fenestration below which results in the appearance of an after-thought.

It is noted that a similar extension was permitted in 1986 however this was assessed against a previous local plan and also was not being provided to facilitate the conversion to an HMO.

The proposed development constitutes overdevelopment that is out of character with the area and conflicts with the objectives of policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135 of the National Planning Policy Framework 2024.

Amenity

Future Occupiers

The Council have adopted Guidance for Homes in Multiple Occupancy Amenity Standards which set out the minimum standards as shown below:

Room Description	1 Person Unit	2 Person Unit
Combined bedroom, living and kitchen <i>(minimum)</i>	13m ²	20.5m ²
Combined bedroom and living space <i>(minimum)</i>	10m ²	14m ²
Bedroom <i>(minimum)</i>	6.51m ²	10.22m ²

In addition to the table above the below is also relevant:

- i) 6.51sqm and 10.21sqm are the proposed national minimum size for one and two person HMO rooms. No rooms below 6.51m² will be considered as suitable for sleeping.
- ii) Bedrooms, living rooms and dining rooms are all classed as habitable rooms and require adequate natural lighting (suitable window) and suitable ventilation (normally by means of an openable window). Dimensions are based on useable room sizes with standard room heights (2.2m-2.3m) and will not consider any floor area where the floor to ceiling height less than 1.5m
- iii) The room sizes do not include space for bathroom/shower room or WC. Where ensuite facilities are provided this must be in addition to the space indicated above. Ensuited are not classed as habitable space.
- iv) In HMOs without a shared living space, additional shared dining space is required close to a shared kitchen that is no more than 1 floor distance from any letting room it serves.

Bedroom 1 is a double which has cooking facilities and an en-suite and therefore should provide 20.5sqm however it provides 14.64sqm of floor space. It is however adjacent to a kitchen/living space and dining room which is communal.

Bedroom 2 is a double with an en-suite. This measures approx. 11sqm and has access to the communal areas and therefore meets the standards.

Bedroom 3 is a double with cooking facilities and an en-suite. This measures approx. 14.4sqm which falls short of the required 20.5sqm but also has access to communal facilities as per bedroom 1. Concerns have been raised by the Council's Private Sector Housing Officer regarding the means of escape from bedroom three due to its location adjacent to a high-risk room without a protected means of escape, nor an obvious secondary means of escape. The main means of escape and secondary means of escape are to lead to a place of safety away from the premise.

Bedroom 4 is a double with an en-suite. This measures approx. 11.8sqm and has access to the communal areas and therefore meets the standards.

Bedroom 5 is a double with cooking facilities and an en-suite. This measures approx. 11.4sqm which falls short of the required 20.5sqm but also has access to communal facilities as per bedroom 1.

Bedroom 6 is a single room which measures approx. 7sqm. The standards require at least 6.51sqm and therefore this is acceptable.

Bedroom 7 is a double bedroom which measures approx. 10.3sqm. The standard requires at least 10.22sqm and therefore this is met.

Bedroom 8 is a single room which measures approx. 9sqm. The standards require at least 6.51sqm and therefore this is acceptable.

Bedroom 9 is located in the converted loft area and, as such, only the floor area which has a ceiling height of over 1.5m can be considered. This double room provides for a bedroom, cooking facilities and an en-suite but no designated living space and measures approx. 12.8sqm. It cannot be considered as benefitting from the communal facilities as these are not 1 floor distance away i.e. the floor below. It therefore falls short of the adopted standards. However discretion can be used to allow one occupant.

All the rooms contain sufficient outlook and daylight and sufficient outside space is provided. Three of the bedrooms will share a bathroom.

It is noted that the Nationally Described Space Standard requires 11.5sqm for a double bedroom. Bedrooms 2, 5 and 7 do not meet these standards.

The above, whilst not a reason to refuse permission on amenity alone given the HMO standards are met, serves to demonstrate that the proposal is an overdevelopment of the site.

Neighbouring Amenity

The proposed extension is located to the opposite side of the property to the attached neighbour and therefore will have no detrimental impact in terms of loss of outlook, privacy, sunlight or daylight. Other neighbours are a sufficient distance away to not suffer loss of outlook, privacy, sunlight or daylight. The proposed rear dormer may increase perceived overlooking however, given this is a residential area of two storey dwellings, mutual overlooking is a common situation and no concerns are raised.

Noise

The application proposal is for a nine bedroom HMO (two single rooms and seven double rooms) which could result in 16 people living at the property. As a single family dwelling this property currently has two double bedrooms and a single bedroom and likely no more than five people. The HMO rooms are designed for adults and therefore potential for more activity in terms of coming and going from the residents compared to a potential family of five or even an HMO for six people. Noise and disturbance from general activity, comings and goings, doors slamming etc has not been addressed in the application and is likely to become a nuisance to those attached to the dwelling. Likewise, the activity from the intense use of the property is likely to result in noise and disturbance to other properties within close proximity of the dwelling. The submitted Planning Statement mentions sound insulation and house rules but no details have been provided how these will impact on noise.

Ventilation

Four rooms will include mechanical extract to external air but no details have been provided. Depending on where these vent to there could be an impact on neighbours or other residents of the HMO.

Waste

Sufficient space is shown to be provided for waste storage. A condition can be imposed on any forthcoming permission that full details of waste storage shall be provided prior to occupation.

Ecology and Biodiversity

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

In England, BNG is mandatory under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#). Developers must deliver a BNG of 10%. This means a

development will result in more or better quality natural habitat than there was before development.

As the proposed development does not impact a priority habitat and impacts less than 25sqm of on-site habitat and 5m of on-site linear habitats such as hedgerows the project is exempt from BNG.

Strategic Access Management and Monitoring Strategy

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 £337.49 for every new bedroom in an 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. The applicants have not paid towards the mitigation.

The proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and therefore the development conflicts with the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 193 and 194) of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Parking and Highways

It is acknowledged that the majority of objections received relate to parking pressures the site is located in a sustainable location close to the town centre, bus stops and shops and therefore planning policy does not require parking to be provided. However it is unrealistic to assume that none of the potential sixteen adult inhabitants of the property would not own a car. It is possible that each couple could own a car resulting in an additional seven cars (nine potential cars minus two that the owners may currently have). This area is located just outside of the restricted parking area and therefore highly used for on street parking. The addition of seven cars competing for parking spaces will result in unneighbourly competition for spaces to the further detriment of the enjoyment of their properties however it does not conflict with the adopted parking standards.

16 cycle spaces are proposed to be provided which equate to one per occupant and no objection is raised to this.

In summary, the proposal meets the parking standards as they are set at a maximum and the site is within a sustainable location. No concerns are raised with regards to highways safety as the proposed driveway already exists and is not proposed to be changed.

The proposal therefore accords with policy CS11 of the Gravesham Core Strategy 2014 and policies T1 and P3 of the Gravesham Local Plan 1994.

Conclusion

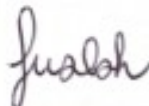
1. The proposal is considered to be overdevelopment of the site, by virtue of the intensification of the use of the property by significantly increasing the number of occupants within the property in an area characterised by single-family dwellings, resulting in the loss of a family sized dwelling and a

significant increase in activity over and above the surrounding residences, detrimentally impacting the amenity of surrounding residents through noise, disturbance, competition for parking 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 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.

Recommendation:

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

Case Officer:	Mrs Alison Webster	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	2 December 2025	Dated:	04 December 2025