

Delegated Report

Householder Planning Application

Planning Application No: 20250695

Location: 21 Hillingdon Road Gravesend Kent DA11 7LQ

Description: Formation of vehicular access with associated hard standing to provide one off-street parking space to front of property.

Applicant: Mr Graham Croker

Site Visit Date: 03 September 2025

Submitted Documents/Plans

Householder Application for Planning Permission form;
Drawing no. 01 Site location plan;
Drawing no. 02 Existing block plan;
Drawing no. 03 Existing site plan, elevation and sections;
Drawing no. 04 Proposed block plan;
Drawing no. 05 Proposed site plan, elevation and sections;
Planning Statement 09 July 2025; and
Letter from Transport Consultant dated 21 July 2025.

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (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 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 9 – Promoting Sustainable Transport
- 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
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

Other Relevant Guidance

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

Consultations, Publicity and Representations

KCC - Highways & Transportation

Referring to the above description, it would appear that this development proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements. If there are any material highway safety concerns that you consider should be brought to the attention of the HA, then please contact us again with your specific concerns for our consideration.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal

technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Neighbouring properties

The application was publicised to four neighbouring properties by letter. Three representations have been received (one objecting and two neither supporting or objecting) and are summarised as follows;

- Everyone should be treated equally when applications are determined regarding driveways. If one application is successful then all others, who have applied numerous times, should also be successful.
- Concerned about the structural effects on no. 19 Hillingdon Road of the removal of hardcore to create the proposed parking space.
- Similar driveway applications have been refused. Concern raised that the removal of the front boundary wall would allow for the bypassing of the proper process.
- If approved this proposal would create confusion and undermine confidence in the Council's planning process, which until now has been clear and consistently enforced.
- If other properties remove front walls, will a permission for a driveway be granted?
- Previous driveway applications have been rejected on grounds that they would negatively impact the image of the street and reduce already limited on-street parking. This proposal should be determined consistently regarding these grounds.

Officer's Analysis

Design, Character and Appearance

Paragraph 135 of the National Planning Policy Framework 2024 (NPPF 2024) sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 139 of the NPPF 2024 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the

character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

In relation to frontage parking, relevant considerations in the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023 are that;

- 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.
- Must be designed to avoid cars overhanging the pavement. Minimum car parking space dimensions of 2.5 metres wide (or 2.7 metres where adjoining an enclosed boundary) and 5 metres deep.
- Should not include gates but if so, they should not open outwards, have sufficient space to open inwards whilst a car is parked and should not block visibility.
- 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.
- There should be no water run-off from the forecourt onto the public highway.
- Where loose surfacing is proposed, include a minimum of one metre depth non-loose hardstanding at the front edge of the driveway.
- Repair or restore any original decorative tiled paths.
- Pedestrian and vehicle visibility splays should be provided.

The application site comprises of a terraced dwelling, which is raised above the level of the adjoining roadway by some 0.8 metres. The front garden includes a stepped pathway and land laid to grass, with some mature vegetation (predominantly on the side boundaries). As the following images illustrate, until relatively recently, the property benefitted from a traditional front wall that matched with others in the surrounding area. The removal of this wall has been detrimental to the character and appearance of the street scene.



Google Street View Images: November 2022



October 2008



Photographs taken 03 September 2025



In the vicinity of the application site, the character of Hillingdon Road is made up of terraced dwellings with traditional front boundary walls and verdant front gardens that are raised above street level. At the eastern end of the road, numerous properties have frontage parking and the adverse impact of the loss of the original front gardens and boundary treatments on the visual amenity of the street scene is significant.

The proposed development would provide a hard surfaced parking area (with a 10% maximum gradient) resulting in the complete removal of the existing raised, grassed area. The existing planting on western side of the site frontage would be retained. Planting is proposed on the eastern side of the site frontage, a living wall would be erected on the southern and western elevations of the proposed parking space and a surface of permeable block paving is proposed. However, no specific details of these features have been provided (although these could be submitted via a planning condition). An electric vehicle charger would be installed at the rear of the proposed parking area.

In the Planning Statement, the applicant sets out that the driveway would have dimensions of 4.4 metres (width) by 5.5 metres (depth). However, this is misleading because the driveway measures 3.7 metres wide at the frontage and 3 metres wide at the rear (measured from the living wall to the new planting area shown on from drawing no. 5).

According to the Householder Extensions/Alterations Design Guide (2021) a single parking space should have minimum dimensions of 2.5 metres width (or 2.7 metres adjoining an enclosed boundary) by 5 metres

depth. As such, the dimensions of the proposed parking area would be greater than that required and would result in the loss of a greater area of planted garden than is necessary. This is a negative design feature and is contrary to the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023.

It is acknowledged that the proposal would not result in cars overhanging the pavement, would provide access to the front door/side of the property, not include gates and avoid adverse surface water run off issues, all of which align with the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023. Furthermore, some of the existing vegetation would be retained and new planting and a living wall would be included in the proposal, which are positive design features.

However, the proposed development would result in the loss of much of the vegetated and all of the raised nature of the front garden at the application site and its replacement with an expanse of hardstanding and a parked vehicles, which would be detrimental to the character and appearance of the street scene. Despite the positive design features of the proposal, the proposed opening on the site frontage would be excessive in width and undermine the existing character of the street scene. Furthermore, the introduction of an open hard standing and parked vehicles on the site frontage, would undermine the existing verdant nature of the front garden (despite the inclusion of a living wall and some new planting).

It is acknowledged that a number of existing vehicle accesses and frontage parking areas already exist in Hillingdon Road. Many of these do not have planning permission and presumably they were permitted development or have become lawful through the passage of time. Some have been granted permission on appeal and some have been approved. However, it is considered that the fact that there are existing accesses would not necessarily justify granting a planning permission that would cause adverse visual impacts in itself. This because every planning application must be determined on its own merits and in order to be relevant in this instance, an existing access must be directly comparable to the current proposal.

It should be noted that the Borough Council's records show that ten applications for frontage parking areas have been determined in Hillingdon Road. Six were refused and an appeal dismissed (at nos. 11, 23, 27, 33 twice and 37), two were refused (at no. 23 twice) one was refused and the appeal allowed (at no. 8) and one was permitted (at no. 10). Therefore, the Borough Council has been consistent in refusing to grant planning permission for similar development proposals.

Appendix 1 contains the appeal decision for no. 23 Hillingdon Road (planning application reference 20191138 and appeal reference APP/K2230/D/20/3249712). This document reinforces the above approach. The Inspector states that;

"The front garden areas of the properties along the southern side of the road in the western part of the road, which includes the appeal site, are predominantly at a higher level than the road and pavement with front retaining walls. These walls increase in height towards the far western end reflecting the downward slope of the road. The majority of these front gardens are retained as such with a variety of lawned areas and other vegetation, giving the road an attractive 'green' appearance compared to the eastern half. There are also a number of street trees."

"I consider that, given the character of this part of the street scene, in particular that it is within that part of the street which remains relatively unspoilt in terms of its more vegetated character compared to the eastern end of the street, the proposed hardstanding would introduce an unacceptably harsh feature that would detract from that established character. Whilst it would include the introduction of a narrow strip of new planting along one side boundary, the proposal would inevitably result in the loss of the street tree which is located towards the centre of the site frontage."

The two approved schemes can be differentiated from the application site due to their location on the northern side of the road. For no. 8 Hillingdon Road, the Inspector highlighted differences between the character/appearance of different parts of the street and allowed the appeal because the proposal was in

line with the existing pattern of development on northern side of the road (planning permission reference 20201144 and appeal reference APP/K2230/D/21/3277340). A copy of the Inspector's report is contained in Appendix 2. For no. 10 Hillingdon Road, the case officer's report concluded that the proposal was not out of character with its surroundings and that it provided an acceptable sized space for one vehicle, subject to the imposition of planning conditions to ensure pedestrian visibility and that only one car would be parked (planning permission reference 20180638). A copy of the delegated report is contained in Appendix 3. As such, these proposals are not directly comparable to the situation at the application site and the decisions have limited weight in the determination of this application.

The Planning Statement suggests that the front garden at the application site is currently unattractive, does not have a decorative front wall and does not possess soft landscaping. The above photographs illustrate the adverse visual impact that the recent wall removal has had on the street scene. However, the greenery provided by the retained grass and vegetation is visually pleasing and the site is not unattractive. In the event that planning permission is refused for this proposal, the applicant is likely to erect a new front boundary treatment (for retaining and visual purposes) and as such, the character of the street scene would be improved. It would be preferable visually for a frontage boundary treatment to be reinstated rather than the proposed driveway be put in place.

Overall, it is considered that the proposed development would undermine the verdant and raised nature of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the NPPF 2024, to the Householder Extensions/Alterations Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

Amenity of Future Occupiers

The proposed development would not impact upon the private amenity space or internal layout of the application property and would not adversely impact on the privacy, daylight or sunlight of its occupants. As such, the proposal would not be detrimental to the amenity of future occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

Due to the design of the proposed development and to the layout and orientation of the surrounding properties, there would be no adverse overlooking, overshadowing, overbearing impacts to the occupiers of the surrounding dwellings. As such, the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

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 of the Gravesham Local Plan Core Strategy (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (1994) require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

Saved Policy T5 of the Gravesham Local Plan First Review (1994) requires new accesses to be in an acceptable location and to an acceptable standard and to not give rise to danger.

According to the Borough Council's adopted Vehicle Parking Standards, a three bedroom dwelling should have two vehicle parking spaces and according to the Householder Extensions/Alterations Design Guide (2021), car parking spaces should be a minimum of 2.5 metres wide (or 2.7 metres where adjoining an enclosed boundary) and 5 metres deep. 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.

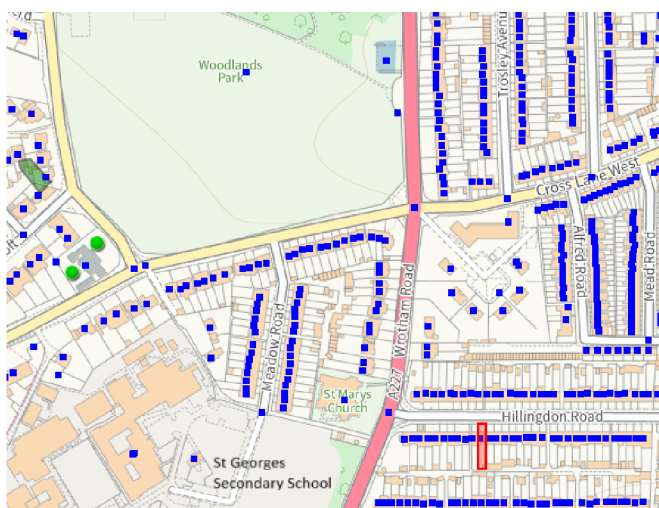
It should be noted that KCC Highways and Transportation have set out that the proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements.

The application property has three bedrooms and no on-site parking at present. The proposed development would result in the provision of a frontage parking area with dimensions 3.7 metres wide at the frontage and 3 metres wide at the rear and 5 metres (depth). Therefore, the proposed parking area would exceed the minimum standard size for one parking space adjacent to an enclosed boundary. Although it is noted that the proposal shows an indicative parking space with dimensions of 2.5 metres width by 5 metres depth.

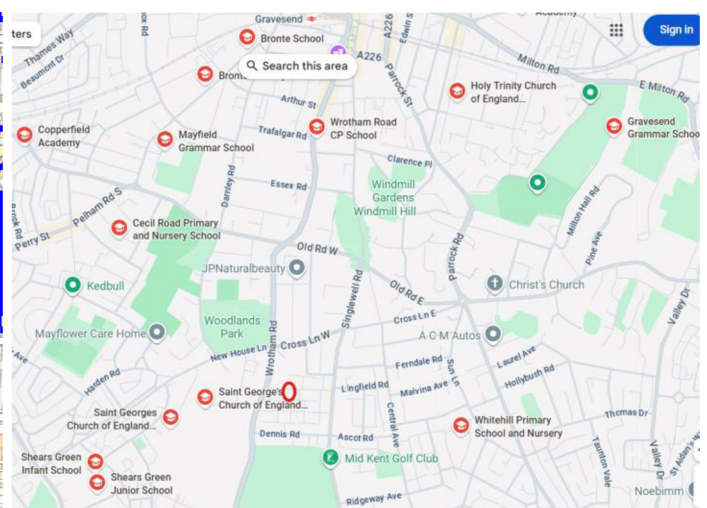
The proposed development would not provide the two parking spaces required under the adopted standards. Although it is noted that the application site is located in a relatively sustainable location, close to local shops and services and a bus route.

It is considered that in principle, the provision of some frontage parking would be beneficial in highways terms but that the proposed development should be designed so as to ensure safe access both onto and off from that space. This approach is in line with the NPPF 2024, Saved Policy T5 of the Gravesham Local Plan First Review (1994) and the Kent County Council Dropped Kerb Guidance and Self-Assessment (2025). Part of this design approach requires appropriate visibility to be provided and also seeks to ensure that safe parking manoeuvres can be undertaken.

It should be noted that, due to the proximity of a number of schools, a church (with a toddler group, Sunday School etc) and Woodlands Park, the pedestrian traffic using Hillingdon Road includes a high number of children. The following images illustrate the application site in red and the locations of Woodlands Park, St Marys Church and Gravesend schools including St Georges (the closest);



Extract from UniMap



Google Maps Extract

The proposed development would include pedestrian visibility splays of 1.5 metres by 1.5 metres, within which a retaining wall would have a height of 0.8 metres (as shown on drawing no. 05). Therefore, insufficient sized pedestrian visibility splays would be provided and these splays would include obstructions over 0.6 metres in height within them. 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.

Whilst it is acknowledged that drawing no. 04 is annotated to say that the retaining walls within the visibility splays would be no higher than 600mm, this is contrary to what is shown on drawing no. 05. Furthermore, as a retaining wall, its height would be dictated by the height of the adjoining land (which may not be in the ownership of the applicant). The applicant has not been asked to clarify this issue, because there is an, in principle, design objection and because insufficient space exists within the application site, to provide the required two metre by two metre visibility splays.

The application site is located on an unclassified road, with a 30 mile per hour speed limit and speed bumps and there are no parking restrictions. On-street parking is very common and spaces are in high demand. Due to the high likelihood of parked vehicles being close to the proposed driveway, visibility for users emerging from the driveway would be compromised, to the further detriment of highway safety.

According to CrashMap data, there have been two vehicle collisions in the vicinity of the application site between 2019 and 2023.

The proposed development would not provide sufficient space to allow a vehicle to turn around within the application site. Therefore, vehicles would either reverse onto the proposed driveway or reverse off it. Both reversing onto and off from the proposed parking area could be hazardous manoeuvres, which would impede traffic flows and cause dangers to passing pedestrians and vehicles. However, as a result of the highway characteristics described above (leading to lower speed passing traffic), the adverse highway impacts of any reversing manoeuvres, would be not be so significant as to warrant a refusal of planning permission.

As part of the determination of this application, the surrounding context is a relevant consideration, but the relevance of existing accesses diminishes, where they do not exhibit the same characteristics as the application site.

The applicant has identified three recent appeal decisions, which he considers relevant to the determination of this application. These are summarised and commented on as follows;

20240534 37 Old Road West, Gravesend (Appendix 1 of the submitted Planning Statement) and 20240358 20 Old Road West, Gravesend (Appendix 2 of the submitted Planning Statement) - The appeal decisions in both cases are very similarly worded and made by the same Inspector. The proposed development at both sites was for a vehicle access and parking space in the front garden of the property and both were refused due to inadequate visibility and the lack of a turning area being provided on site. In allowing the appeals, the Inspector referred to the proposals being a similar arrangement to other properties and that vehicle manoeuvres across footpaths into and out of accesses are a common feature along Old Road West.

The Borough Council would raise serious concerns regarding the Inspector's statements at paragraphs 8 and 9 of no. 37 and paragraphs 5 and 6 of no. 20. It is considered that the fact that existing accesses are dangerous should not be a reason to accept a new proposal that would exacerbate adverse highway safety impacts. This would set an alarming precedent.

The application site can be differentiated from the situations at no. 37 and 20 Old Road West in a number of ways. Most notably, it does not require a turning area and for the area surrounding it, existing accesses are much less numerous. As such, it is considered that the appeal decisions at nos. 20 and 37 Old Road West are not directly comparable to the situation at the application site and would not justify planning permission being granted for the current proposal. Overall, the appeal decisions have limited weight in the determination of this application.

Warner House, Cotton Lane, Stone, Dartford (Appendix 3 of the submitted Planning Statement) - The appeal proposal and site differ considerably from the current application site, in that the road (Cotton Road, Stone) is a 'C' classification, the access already existed and the development was for a new dwelling. As such, this appeal decision is not directly comparable to the situation at the application site and the decision has limited weight in the determination of this application.

However, the applicant refers to the Inspector's statement in paragraph 12, regarding Manual for Streets 1 and 2 as not being relevant to an access serving a few dwellings. However, as set out above, the KCC Residential Dropped Kerb Guidance and Self-Assessment 2025 sets out that a driveway should incorporate appropriate sightlines according to the speed limit of the road (carriageway visibility) and that 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. Therefore, the requirement for adequate vehicle visibility, is not taken from Manual for Streets, it is taken from a 2025 KCC highway document. Notwithstanding this, for the application site, there are no significant concerns regarding vehicle visibility.

It is acknowledged that the proposal would provide an electric vehicle (EV) charging point, which would be a sustainable and positive feature.

The letter from the Transport Consultant sets out that the proposal would enable the elderly and those in wheelchairs to visit the application site, with better access, which would be another positive feature. The letter also states that the proposal would reduce the upkeep of the site frontage as the householders ages and ensure that future on footway parking would not occur. However, reduced upkeep of the site frontage could be achieved in other ways and on-pavement parking would not be precluded by the provision of a driveway at the application site.

Lastly the letter refers to the need for the Borough Council to make consistent decisions and that previous similar decisions are material considerations. This is acknowledged and similar decisions are referred to above.

Taking all of the above issues into account, it is considered that the highways benefits of the proposal (that it would allow off street parking, with appropriate dimensions, provide sufficient vehicle visibility and EV charging and improve disabled and elderly access to the site) would not overcome the negative impacts (insufficient pedestrian visibility, which would increase in the potential for hazardous manoeuvres, which would cause dangers to passing pedestrians). As such, the proposal would be detrimental to highway safety and be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014), to Saved Policies T1 and T5 of the Gravesham Local Plan First Review November 1994, to paragraph 115(b) of the NPPF 2024, to the Householder Extensions/Alterations Design Guide (2021), to the Gravesham Driveway Dropped Kerb Guidance (2023) and to the Kent County Council Dropped Kerb Guidance and Self-Assessment (2025).

Ecology and Biodiversity

Biodiversity Net Gain (BNG) is a mandatory requirement for all new development and proposals must deliver a BNG of at least 10% unless they are exempt. In this instance, the proposed development is a householder proposal and therefore is exempt from BNG.

Notwithstanding the BNG exemption, biodiversity is an important consideration in all new development. Policy CS12 of the Gravesham Local Plan Core Strategy (2014) states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within Biodiversity Opportunity Areas and within new development.

The proposal would result in the complete removal of the existing raised, grassed area. The existing planting on western side of the site frontage would be retained. Planting is proposed on the eastern side of the site frontage and a living wall would be erected on the southern and western elevations of the proposed parking space. A condition can be attached to any planning permission granted to require the submission and approval of a landscaping scheme, which includes native and pollinator friendly planting.

The existing grassed area would not be particularly biodiverse and provided that a suitably worded landscaping condition is used, there would be no significant adverse biodiversity impacts and the proposal would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Any Other Material Planning Considerations

The application site is located within an area of multi-period archaeological potential, Groundwater Source

Protection Zone 2 and a Site of Special Scientific Interest (SSSI) Impact Risk Zone. However, as the proposed development is within the confines of an existing residential garden and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to archaeology, groundwater or any sensitive habitats. As such, the proposal would be in line with Policies CS12, CS19 and CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located within the buffer zone for the Woodfield Avenue historic landfill site and as such, any groundworks may be subject to contamination. However, provided that a contamination watching brief planning condition is attached to any planning permission granted, then there would be no adverse ground contamination impacts.

Local residents have raised a number of concerns, some of which have been covered in the above discussion. The outstanding issues are summarised and commented on (in italics) as follows;

- Everyone should be treated equally when applications are determined regarding driveways. If one application is successful then all others, should also be successful – *planning applications for driveways are treated consistently by the Borough Council and determined according to their individual merits, in the context of the development plan and any other material considerations. This means that some applications are permitted and some refused.*
- Concerned about the structural effects on no. 19 Hillingdon Road - *this is not a planning consideration.*
- Concern raised that the removal of the front boundary wall would allow for the bypassing of the proper process – *the above discussion takes into account the loss of the frontage boundary treatment and the application has been treated consistently with similar proposals.*
- If approved this proposal would create confusion and undermine confidence in the Council's planning process, which until now has been clear and consistently enforced – *every application is considered on its own merits, in the context of the development plan and any other material considerations. This means that some applications are permitted and some refused.*
- If other properties remove front walls, will a permission for a driveway be granted – *No, the loss of the frontage treatment would be taken into consideration in the assessment of the proposal.*

The comments provided by KCC Highways & Transportation can be brought to the attention of the applicant in an informative attached to any planning permission granted.

Conclusion

The proposed development would have no adverse residential amenity, biodiversity, surface water run off, contamination, groundwater or sensitive habitats impacts. However, the proposal would be out of character with the application property and its surroundings and would be detrimental to visual amenity and highway safety.

Overall, it is considered that the adverse impacts of the proposed development attract significant weight and would significantly and demonstrably outweigh the benefits of the proposal. Therefore, following a thorough assessment of the application and all material planning considerations, it is considered that the proposed development cannot be supported.

Recommendation

That planning permission should be refused on the following grounds;

1. The proposed development would undermine the verdant and raised nature of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the National Planning Policy Framework 2024, to the Householder Extensions/Alterations

Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

2. By virtue of its inadequate pedestrian visibility splays, the proposed development would make insufficient provision for safe egress from the application site, leading to drivers presenting dangers to passing pedestrians on Hillingdon Avenue. As such, the proposed development would be detrimental to highway safety and be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (2014), to Saved Policies T1 and T5 of the Gravesham Local Plan First Review (1994), to paragraph 115(b) of the National Planning Policy Framework 2024, to the Householder Extensions/Alterations Design Guide (2021), to the GBC Front Driveway Guidance 2023 and to the Gravesham Driveway Dropped Kerb Guidance (2023).

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	11th September 2025	Dated:	25 th September 2025