

Planning Statement

**110 Singlewell Road, Gravesend,
Kent, DA11 7PT**

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



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1 Introduction

- 1.1 This Planning Statement has been submitted in support of an application for the following development at 110 Singlewell Road, Gravesend, Kent, DA11 7PT (hereafter referred to as 'the Site'):

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

- 1.2 The proposed development affects the following Land Registry title(s):

Title Number	Description	Owner
K304715	110 SINGLEWELL ROAD, GRAVESEND DA11 7PT	The Applicant

- 1.3 The application is accompanied by the following plans and documents:

- 4464.ON – Planning Statement
- 4464 – 01 Site Location Plan
- 4464 – 02 Existing Block Plan
- 4464 – 03 Existing Site Plan and Elevations
- 4464 – 04 Proposed Block Plan
- 4464 – 05 Proposed Site Plan and Elevations

2 Site Context

- 2.1 The Site, which is in residential use, extends approximately 148m² and is situated on the east side of Singlewell Road. The Site comprises an extensive rear garden which, when measured, is 21m from the existing rear wall of the dwelling.
- 2.2 The principal elevation of the dwelling is constructed from predominantly yellow brick with red brick highlights, which is a common feature at the north end of Singlewell Road. There is a ground-floor bay window and a porch that leads to the front door. Furthermore, the dwelling comprises brown roof tiles, black guttering and downpipes, white timber windows and a white UPVC front door.
- 2.3 The existing front garden is level with the highway and comprises a small square of grass. There is a tile path that leads from the highway to the front door, which is separated by a gate and a low brick wall. There are also two hedges in the front garden on the north and west elevations.
- 2.4 The rear garden of the subject site abuts a small undesignated path that allows access from Singlewell Road to Portland Avenue. However, this is not wide enough for a vehicle. It also comprises an outbuilding to the rear.
- 2.5 In a wider context, Singlewell Road comprises entirely residential dwellings that are predominantly terraced or semi-detached. The southern end of the street possesses mainly off-street parking, whilst the northern end of the street is mainly on-street parking.
- 2.6 This Site is the subject of the following planning constraints and characteristics:
- Flood Zone 1

3 Relevant History

3.1 The following records are understood to be relevant to the Site:

[Erection of a two-storey and part single-storey rear extension.](#)

Ref. No 20211115 | Status: Approved on 8th November 2021

4 Proposed Development

4.1 The application entails the following elements:

- Replace the existing garden with a driveway to provide 1 no. parking space.
- Allow for dropped kerb access
- Materials to be used will be permeable block paving
- The driveway will be 2.7m in width and 5m in depth
- The parking space will be 2.5m in width and 5m in depth
- To include soft landscaping on the north elevation (including a hedge and flower bed.
- There is also a flower bed on the east elevation
- Brick pillar on the south elevation to be reduced to 0.6m

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker, this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 39 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 It is understood that the Development Plan for Gravesham, within which the Site is located, comprises the following documents:

- Core Strategy (2014) (CS)
- Gravesham Local Plan First Review (1994) (LPFR) – Saved Policies

5.6 The CS sets out a long-term vision for the future of Gravesham based on evidence of the need to support communities and outlines what makes Gravesham a distinctive and attractive place to live and work. Furthermore, it helps to support and inform sustainable development via investment in infrastructure, economic development, and regeneration proposals within the borough, while promoting healthy communities. Lastly, it aims to provide a consistent basis for planning application decisions. The following policies are considered as relevant:

- CS01 – Sustainable development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS19 – Residential Layout Guidelines (previously policy H2)

5.7 The Gravesham Local Plan First Review (1994) was replaced by the adopted Local Plan (2014). In September 2007, the Secretary of State issued a direction on policies to be saved and deleted. The following are policies that have been saved, remain operational and are relevant to the proposal.

- T1 – Impact of Development on the Highway Network
- T5 – Access to the Identified Highway Network
- P3 – Vehicle Parking Standards

Other Material Considerations

The Framework (NPPF)

5.8 In summary, the following paragraphs are considered most relevant as additional material considerations in the determination of this application:

- Paragraph 7 - Fundamentality of the planning system
- Paragraph 8 – Three overarching objectives for sustainable development
- Paragraph 115 – Unacceptable impact on highway safety

Manual for Streets 1 (MfS1) (March 2007)

- 5.9 MfS1 (published in March 2007) contains helpful guidance in respect of visibility and frontage accesses. Chapter 7 considers the geometry of streets. This chapter comprises several parts.
- 5.10 Section 7.9 is entitled frontage access, which reflects the type of access associated with the proposal. The proposed development does not involve the formation of a junction between roads, streets, or lanes. The subsequent parts of this section are of specific relevance.
- 5.11 Paragraph 7.9.1 confirms that the provision of front accesses helps to “generate activity and a positive relationship between the street and its surroundings.”
- 5.12 Paragraph 7.9.2 sets out the four factors that should be considered when considering a frontage access:
- The speed and volume of traffic on the street
 - The possibility of vehicles turning around within the property, where this is possible
 - The presence of gathered accesses if individual accesses are not considered acceptable
 - The distance between the property boundary and the carriageway – to provide adequate visibility for the emerging driver

Manual for Streets 2 (MfS2) (September 2010)

- 5.13 MfS2, published in September 2010, confirms that it “builds on the guidance contained in MfS1, exploring in greater detail how and where its key principles can be applied to busier streets and non-trunk roads.” Published in 2010, this guidance is also more up-to-date than MfS1.
- 5.14 Chapter 9 of MfS2 covers junctions, crossings and accesses, and, as with MfS1, MfS2 contains a specific section on frontage accesses (9.10). Paragraph 9.10.2 refers back to the research referenced in MfS1, noting that there was no indication that traffic of up to 10,000 vehicles per day on roads with frontage accesses would indicate a decline in road safety.
- 5.15 The next paragraph refers back to research referenced in the Highways Agency's Design Manual for Roads and Bridges TD 41/95 (a precursor to MfS1, published in March 1995), which examined the relationship between access frequency and

collisions on 3,000km of all-purpose trunk roads in England including urban, rural, single, and dual carriageways.

- 5.16 Paragraph 9.10.3 in MfS2 confirms that: "the research showed that there was no simple statistical relationship between the number of collisions and the number of vehicular connections in the form of minor junctions and direct accesses."

Householder Extensions/Alterations Design Guide SPD (adopted October 2021)

- 5.17 The SPD makes clear that extensions and alterations to a home can be an economical way of ensuring it can meet a household's present and future needs. In seeking to meet such needs, it is important to ensure that any extension or alteration to a home is well-designed, well-built, and sympathetic to its surroundings.
- 5.18 It goes on to say that by doing so, we can ensure that there are no adverse effects on the original house, immediate neighbours, the local view of the street, as well as the character and appearance of the local area.
- 5.19 Paragraph 10.21 sets out the most important criteria for the laying of a hard surface to the front garden of houses, which are as follows:
- 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 the side of the property. 1 metre should be the minimum space between or around car parking spaces.
 - Front garden parking must be designed to avoid cars overhanging the pavement. Car parking spaces a minimum of 2.5m wide (2.7m where spaces adjoin an enclosed boundary) and 5m deep should be provided.
 - Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked.
 - Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway.
 - Avoid removing any existing trees or established hedges and introduce new planting wherever possible.

- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of Permitted Development.
- There should be no water run-off from the forecourt onto the public highway.
- Where loose surfacing is proposed, a minimum of 1m depth of non-loose hardstanding should be provided at the front edge of the driveway with the public highway.
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling.
- Visibility splays should be provided.

Further material consideration:

- SPG2 – Residential Layout Guidelines (2020)
- SPG4 - Kent County Council Parking Standards (2006)
- Kent Design Guide – Visibility (2008)
- Kent Design Guide – Making it Happen – Highways (2008)

6 Planning Assessment

Key Issues

6.1 The following are considered to be the key issues in the assessment of this application:

1. Highway Safety
2. Impact on Landscape
3. Parking Provision

1. Highway Safety

6.2 The Site is situated along a C-classified road, which means the Site must abide by the Gravesham policies surrounding parking as well as householder alterations.

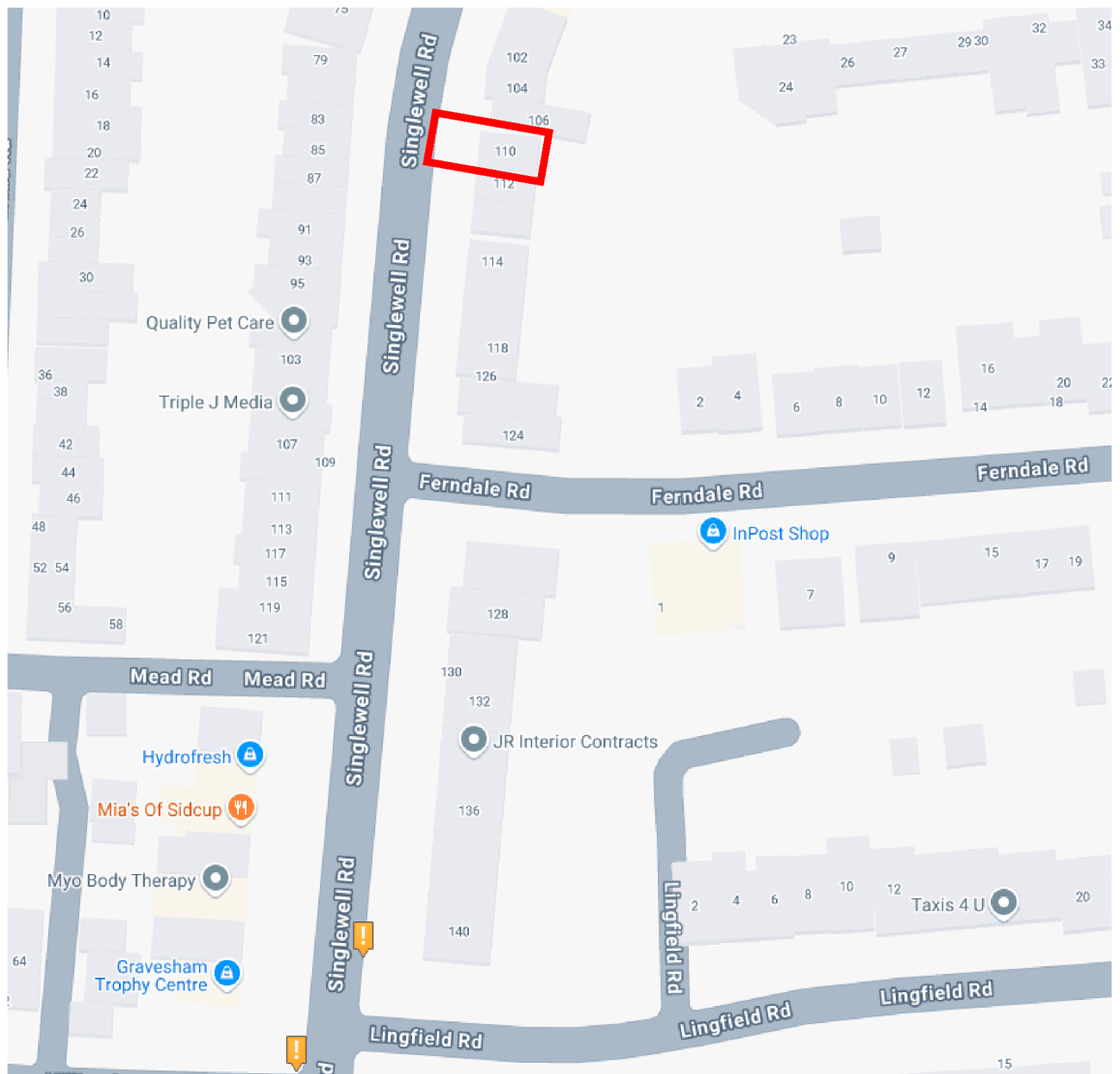
6.3 As set out above, paragraph 115 of the NPPF makes clear that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety.

6.4 Below is the accident data for the past 5 years for Singlewell Road. It does not suggest that the presence of an additional vehicular access would result in any further accidents.

6.5 The map demonstrates two accidents that have taken place within 200m of the Site in the past five years. However, it is clear these accidents have taken place at the junction between Singlewell Road and Hillingdon Road or as a result of vehicles exiting the parade of shops on the west of the street.

6.6 The first accident, which is represented by the most northern orange marker, took place on 29/10/19, was considered 'slight' in severity and involved one vehicle and resulted in one minor casualty. This is considered to have occurred as a result of a vehicle exiting the parade of shops unsafely.

6.7 The second accident, which is represented by the most southern orange marker, took place on 25/02/22, was considered 'slight' in severity, involved one vehicle and resulted in one minor casualty. This is considered to have occurred at the junction between Singlewell Road and Hillingdon Road.



- 6.8 The above implies that the addition of the proposed driveway would not cause an impact on highway safety, as there is no evidence to suggest such accesses are dangerous within the locality.
- 6.9 Paragraph 9.10.3 in MfS2 supports the idea of frontages having 'no simple statistical relationship between the number of collisions and the number of vehicular connections in the form of minor junctions and direct accesses. Therefore, the proposal would have little to no impact on the highway safety of Singlewell Road.

- 6.10 Another issue that has been highlighted is the concern of visibility splays for the driveway. MfS1 highlights in the table below that the required distance of visibility when emerging onto a major road at 30mph.

Table 7.1 Derived SSDs for streets (figures rounded).

Speed	Kilometres per hour	16	20	24	25	30	32	40	45	48	50	60
	Miles per hour	10	12	15	16	19	20	25	28	30	31	37
SSD (metres)		9	12	15	16	20	22	31	36	40	43	56
SSD adjusted for bonnet length. See 7.6.4		11	14	17	18	23	25	33	39	43	45	59
Additional features will be needed to achieve low speeds												

- 6.11 The table is based on the perception-reaction time of the average driver. For a 30mph road, the recommended visibility splay is 43m in each direction.
- 6.12 This figure, however, is aimed at inter-visibility between vehicles on major and minor arms of roads as opposed to access from private frontages.
- 6.13 In policy terms, there will be sufficient vehicular visibility for the new frontage, as there is no defined requirement for driveways, only for major and minor arms.
- 6.14 Two recent appeal decisions on Old Road West (numbers 20 and 37), as well as a recent appeal decision in Dartford (Warner House), confirm that the above visibility splay requirements are not to be applied to domestic accesses, such as this proposal. The appeal decisions have been divided into sections for easier understanding.
- 6.15 Please see the respective links for each appeal decision in full.

a) 37 Old Road West - [3351002](#)

- 6.16 At number 37 Old Road West, which GSP worked on directly, the main reason for the refusal at the application stage was 'inadequate visibility splays when exiting the driveway' as well as 'it not being possible to turn a vehicle on site', both of which relate to highway safety issues.
- 6.17 However, it is worth noting that this viewpoint was not shared by the KCC Highways Officer. During the consultation period, KCC Highways and Transportation highlighted the main issues as follows:

- Pedestrian visibility splays are required at the proposed access; they should measure 2m x 2m behind the footway on both sides, with no obstructions over 0.6m above footway level and should be demonstrated on a revised plan.
- The new access will require a bound surface for the first 5m from the edge of the highway and the provision of measures to prevent the discharge of surface water onto the highway.
- Please note that all street lamp columns and utility plant needs to be situated at least 1.5m from the location of the top of the ramped kerb of the proposed crossover. Any street furniture, lamp columns and utility plants within 1.5m must be relocated at the expense of the applicant.

6.18 In the Appeal Decision, the Inspector starts by noting that there is a 'myriad of hardscaped frontages evident in the street scene, creating off-street parking spaces for the houses along both sides of Old Road West.

6.19 The Inspector then states that despite the LPA making clear there is a lack of visibility for vehicles, 'the prospect would be little different to the existing accesses to numerous properties elsewhere along Old Road West'.

6.20 The Inspector then goes on to highlight 'due to the infrequency and short duration of such manoeuvres and the low speeds involved, I find that highway safety would not be unduly compromised in this particular instance'.

6.21 This recent appeal decision confirms that proposed domestic accesses do not require the vehicle visibility, contrary to what GBC have highlighted in the past.

b) 20 Old Road West - [3349193](#)

6.22 Another Appeal Decision that supports the argument that vehicle accesses for private driveways do not impact highway safety is number 20, Old Road West, which was reviewed by the same Inspector.

6.23 Although the refusal at the application stage at number 20 was also subject to character and appearance issues, one of the reasons for refusal was based on a lack of visibility splays with GBC stating, 'with no adequate vision splays, the development has resulted in a highway safety impact.'

6.24 Again, this view was not shared by KCC Highways and Transportation, who stated there would be no objections to the proposal as long as the following were achieved:

- Provision of measures to prevent the discharge of water onto the highway
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans before the use of the site commences
- Use of a bound surface for the first 5m of the access from the edge of the highway
- Provision and maintenance of 2m x 2m pedestrian visibility splays behind the footway on both sides of the access with no obstruction over 0.6m above the footway level prior to the use of the site commencing.

6.25 In the Appeal Decision, the Inspector states that "The prospect would be little different to the current accesses to properties in the surroundings. Given the sporadic nature and limited duration of manoeuvres, which would occur at low speed, and the relatively wide footway, I consider that the safety of pedestrians would not be unduly compromised in this particular instance. Furthermore, there is no evidence that any incidents involving vehicles and pedestrians have been recently reported in the locale".

6.26 The Inspector goes on to conclude in both Appeal Decisions that the developments will not have a detrimental impact on highway safety, which the applicant considers should be the approach applied in this application.

6.27 This decision, in connection with 3351002, supports that access onto a classified road will not be detrimental to highway safety.

c) Warner House - [3251527](#)

6.28 Lastly, the application at Warner House in Dartford was originally refused at the application stage by Dartford Borough Council due to the effect of the use of the access on highway safety.

6.29 In the Appeal Decision, it was set out that KCC was of the view that the access was "substandard" due to the limited forward visibility. The final figures were deemed to be 15m to the west and 28m to the east, which contradicts the 43m by 2m that should be available as set out in MfS1 and MfS2.

6.30 However, the Inspector goes on to make clear that 'given what is stated in MfS1 and MfS2, the provision of visibility splays of up to 43m by 2m appears to be applicable at junctions between 'major and minor arms', rather than a junction between a road and an access serving a few dwellings'.

6.31 The Appeal Decision finally concludes that the development's use of access would not have an adverse effect on highway safety.

- 6.32 The three Appeal Decisions referenced above, both within and outside of Gravesham, provide clarification about the standards held by KCC when it comes to domestic access.
- 6.33 The pedestrian visibility splays on the proposed drawings show these as being 2m each way at a height of 0.6m to ensure maximum safety for pedestrians. The vehicle visibility is also shown on the plans.
- 6.34 The proposed soft landscaping is considered not to impact the visibility of either pedestrians or vehicles, given its height. Additionally, it will not adversely impact the space standards for the proposed parking space.
- 6.35 Furthermore, the proposal is in line with the MfS, and the four criteria set out in paragraph 7.9.2 for emerging from property frontages, which are as follows:
- a) The speed and volume of traffic on the street – *Singlewell Road is a 30mph road, and the traffic is not fast-moving, so with the correct vision splays for pedestrians, the harm to highway safety will remain low.*
 - b) The possibility of vehicles turning around within the property where this is possible – *In this case, it is not possible to provide a turning circle as a result of the capacity of the parking area, as there is only one space. It is also not considered necessary due to the speed and volume of the traffic at this location*
 - c) The presence of gathered accesses if individual accesses are not considered acceptable – *This is not relevant to the Site*
 - d) The distance between the property boundary and the carriageway – to provide adequate visibility for the emerging driver. – *The boundary is over 2 metres away from Singlewell Road, allowing suitable pedestrian visibility for the emerging drivers.*
- 6.36 Additionally, the road does not show evidence of exceeding a 10,000 car-a-day limit, which is set out by MfS 1,
- 6.37 Also, there is no indication that traffic over 10,000 vehicles per day on roads with frontage accesses would indicate a decline in road safety.
- 6.38 Another key factor when considering visibility would be the existing double yellow lines. It further suggests that the vehicular visibility will not be obstructed by parked cars along the street, as it forbids people to do so.

- 6.39 The double yellow lines shown in the image below indicate how sight lines will not be hindered. The Site has double yellow lines directly outside the dwelling that extend towards the north, in turn further proving the point of safety.



2. Impact on Landscape

- 6.40 As shown in the proposed elevations, there will be additional soft landscaping proposed at the site to make up for what will be lost as a result of the access.
- 6.41 There will be soft landscaping on the north and east side of the existing garden, as well as the use of permeable block paving as opposed to solid hardstanding.
- 6.42 This will further enhance the appearance of the Site as well as contribute to the drainage on the Site, ensuring that there is no excessive water runoff onto Singewell Road.
- 6.43 As set out above, paragraph 10.21 of the Householder Extensions/Alterations Design Guide SPD sets out the criteria for the laying of a hard surface to the front garden of houses, which are as follows:

- 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. – *As shown in the drawings, the driveway will not cover the entire front garden space; the pathway to the front door has been retained, as well as the proposed soft landscaping on the north and east elevations*
- Allow sufficient space between the car and the dwelling to allow access to the front door and the side of the property. 1 metre should be the minimum space between or around car parking spaces. *The proposed parking space will not impact the access to the front door, so this is not relevant.*
- Front garden parking must be designed to avoid cars overhanging the pavement. Car parking spaces a minimum of 2.5m wide (2.7m where spaces adjoin an enclosed boundary) and 5m deep should be provided. – *The driveway is 5m in depth and 2.7m in width, with the parking space being 5m in depth and 2.5m in width, so therefore abides by the above measurements.*
- Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked. – *There are no proposed gates for the development; therefore, it does not conflict with this policy.*
- Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway. – *There is no proposed gate, so this is not relevant.*
- Avoid removing any existing trees or established hedges and introduce new planting wherever possible. – *The existing hedge to be lost is considered to be mitigated by the proposed soft landscaping at the Site.*
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of Permitted Development. – *The use of permeable block paving will reduce the chance of run off into the main carriageway and pedestrian access.*
- There should be no water run-off from the forecourt onto the public highway. – *This again will be resolved by the permeable surface being used for the parking aspect of the driveway. Also, the greenery will aid in the reduction of surface runoff.*
- Where loose surfacing is proposed, a minimum of 1m depth of non-loose hardstanding should be provided at the front edge of the driveway with the public highway. *There is no loose surfacing, so this is not relevant.*
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling. – *The majority of the existing tile path*

will be retained as part of the subject application. The existing tiles on the east elevation have been removed for the implementation of further soft landscaping. The Applicant contends that the tiles to the east were implemented by them and are not original.

- Pedestrian and vehicle visibility splays should be provided. – *Visibility splays are shown on the proposed block plan. The plans show 1m to the east and 1.5m to the west in accordance with the Kent Design Guide, page 133 which explains the minimum parameter range required is 1m x 1m.*

6.44 Although it could be suggested that the removal of the existing hedge could adversely harm the landscape, it is considered that the existing and proposed soft landscaping mitigates any impacts of its loss.

6.45 It is also considered that the existing hedge holds little to no value to biodiversity, which is an approach further supported by the recent appeal decision at 20 Old Road West (3349193).

6.46 The Inspector concludes that *'the removal of the hedge and an area of grass would be unlikely to provide a valuable habitat for wildlife, and I have no robust evidence, for example from a qualified ecologist, that their loss is harmful to biodiversity'*.

6.47 In this case, the Inspector also stated that a condition requiring additional planting would resolve any concern in this respect. The Applicant is happy to accept a suitable condition concerning soft landscaping to mitigate any impacts of the hedge to be lost. Therefore, it is considered that this approach can be taken at 110 Singlewell Road.

3. Parking Provision

6.48 The Gravesham SPG4 states that the maximum number of parking spaces for a 2-bedroom dwelling is 2.

6.49 Currently, 110 Singlewell Road has no existing parking spaces. Therefore, the addition of the proposed development will remain under the number of parking spaces allowed for a dwelling of this size.

7 Conclusions

- 7.1 As demonstrated above, there is sufficient evidence that the proposed development is in accordance with the relevant policies and documents.
- 7.2 The proposed retained and new soft landscaping is considered to be sufficient in respect of retaining the character and enhancing the appearance, as well as the proposed materials being used for the driveway. The path that provides access to the front door will be retained in order not to impact the wider character.
- 7.3 Furthermore, as detailed above, and in accordance with the Manual for Streets, the driveway will supply sufficient visibility for both cars and pedestrians. There will be little to no impact on Highway Safety as a result of this proposal.
- 7.4 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority, and it is respectfully requested that this submission be approved.