



Delegated Report

Householder Planning Application

Planning Application No: 20250509

Location: Bluebells Willow Walk Meopham Gravesend

Description: Retention, remodelling and extension of the existing property to create two self build single dwellinghouses.

Applicant: Mr and Mrs M. Cantwell

Site Visit Date: 18.08.25

Submitted Documents/Plans

Application Form
Cover Letter
Location Plan
~~1001 C Block Plan – Existing~~
1001 D Block Plan – Existing
1010 D Ground Floor Plan – Existing
1013 C Roof Plan – Existing
1030 C North and South Elevations – Existing
1032 C East and West Elevations – Existing
1020 C Sections AA and BB – Existing
~~1101 D Site Block Plan – Proposed~~
1101 E Site Block Plan – Proposed
1110 D Ground Floor Plan – Proposed
1111 D First Floor Plan – Proposed
1113 D Roof Plan – Proposed
1132 D East and West Elevations – Proposed
1130 D North and South Elevations – Proposed
1120 D Sections AA and BB – Proposed
1121 D Section CC – Proposed
Preliminary Ecological Appraisal
Bat Roost Assessment
BNG Self Build Form

Relevant Planning History

Reference	Description	Decision	Decision Date
20240772	Demolition, remodelling and extension of the existing property to create two self- build single dwellinghouses	Refused	21.01.2025
20240291	Demolition of conservatory and erection of a single storey rear extension. Changes to front fenestration.	Permitted	20.05.2024
20020569	Demolition of rear conservatory and erection of a front porch	Permitted	28.08.2002

19970581	Erection of a first- floor side extension incorporating conversion of roof space to form bedroom and storeroom	Permitted	25.09.1997
19881210	Outline application for the erection of a single storey dwelling	Permitted	19.05.1989
19820755	Erection of single storey dwelling	Approval of details	29.11.1982
19820660	Continued use of land for the stationing of a residential caravan for one year	Permitted	29.11.1982

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS16 – Affordable Housing
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the 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 12 – Achieving Well-Designed Places

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Other Relevant Guidance

- Kent County Council Dropped Kerb Guidance and Self-Assessment (2023)
- Gravesham Driveway Dropped Kerb Guidance (Informal Guidance) (2023)
- Gravesham Front Driveway Design Guidance (Informal Guidance) (2023)

Consultations, Publicity and Representations

Consultees

Meopham Parish Council

No comments received.

Ward Councillors

No comments received.

Dickens Country Protection Society

No comments received.

GBC Service Manager (Housing Operations)

No comments received.

GBC Environmental Protection

No comments received.

GBC Waste and Refuse

No comments received.

Southern Water

Received on 09.06.2025

Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

We request that should this planning application receive planning approval, the following informative is attached to the consent; *“Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to and approved in writing by the Local Planning Authority, in consultation with Southern Water”*.

Proposed Soakaways

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development. No new soakaways should be located within 5 metres of a public sewer or adoptable gravity sewer, rising main or water main.

No soakaways should be connected to the public surface water sewer.

Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting Near Water Mains and Sewers" and the Sewerage Sector Guidance with regards to any landscaping proposals and our restrictions and maintenance of the tree planting adjacent to sewers, rising mains and waters mains.

Condition: In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre- commencement condition is attached to the planning permission: *“The developer must advise the Local Authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of development”*.

Proposed works involving demolition

In order to protect and safeguard the existing water supply apparatus, Southern Water requests formal notification of any proposed demolition works prior to such works being undertaken.

Southern Gas

No comments received.

KCC Highways

Received on 29.05.2025

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.

KCC Ecological Advisory Service

Received on 20.06.2025

We have reviewed the documents provided and are satisfied that sufficient ecological surveys have been completed.

The site has an ancient woodland to the rear and the required 15m ancient woodland buffer is within the residential garden and goes up to the building boundary. This will require precautionary measures for the protection of ancient woodland and the associated buffer.

The applicant has stated they are exempt from BNG as these two proposed dwellings are self and custom build. The LPA need to be satisfied that this application meets that exemption.

Ancient Woodland

Ancient woodland covers 2.4% of England's land mass and is a rare and irreplaceable habitat.

The proposed development is adjacent to an area of designated ancient woodland. As such, we highlight paragraph 193 of the NPPF which states that *"development resulting the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"*.

The site has an existing structure on the site which will be converted into two dwellings. The 15m ancient woodland buffer zone is located with the rear garden of the existing property and has been illustrated on the submitted plans. This buffer zone is shown to be adjacent to existing structures and hardstanding.

The Natural England/ Forestry Commission standing advice states that there should be a minimum 15m buffer zone between development and ancient woodland. A larger buffer zone may be needed to account for any direct or indirect adverse effects associated with proposals, as well as to preserve the root protection area of trees within the woodland. Larger buffer zones are more likely to be needed if the surrounding area is less densely wooded, close to residential areas and steeply sloped.

The buffer zone needs to include buffering the development from gardens (so the woodland should be at least 15m from the gardens). The guidance also requires consideration of the potential for additional impacts from proposals even when there is an existing development within this minimum buffer.

Further, the existing condition of the affected ancient woodland is not relevant. Standing advice states;

"Where a proposal involves the loss or deterioration of ancient woodland or ancient or veteran trees, you should not take account of the existing condition of the ancient woodland or ancient or veteran tree when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management".

Standing advice states that the following mitigation measures should be considered in any application in or adjacent to woodland;

- putting up screening barriers to protect ancient woodland or ancient or veteran trees from dust and pollution
- measures to reduce noise or light

- design open spaces to protect ancient or veteran trees; and
- creating buffer zones (typically 15m from the boundary of the woodland).

We highlight that it is not best practice to have an ancient woodland buffer zone within a garden, but as this is an existing garden, we accept that there could be no change in this case, if measures are in place for the protection of the ancient woodland and associated buffer zone, including the soils. No construction or storage of construction materials should be conducted in this zone, and we require a precautionary mitigation strategy for the ancient woodland and buffer zone to be included within the CEMP, to protect it from impacts from the proposed development.

Protected Species

A preliminary ecological appraisal and preliminary roost assessment for bats has been completed. The follow up survey for bats has found this site is negligible for the presence of bats within the building, but as the site backs onto ancient woodland a sensitive lighting strategy will be required as bats will likely be foraging and commuting within the area.

Vegetation within the site has been identified as suitable breeding bird habitat and some may be impacted. We recommend that any work to vegetation is conducted outside the bird breeding season (1st March to 31st August) to avoid risk of impacts or if in the breeding season, a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works. This should be included in the environmental plan (CEMP) outlined further below.

Other protected species, such as badgers, dormice, reptiles and amphibians have been considered for this site and their presence is considered unlikely. Hedgehogs may be sheltering or commuting within the area and precautionary mitigation is suggested. This can be included in the CEMP.

We are satisfied that sufficient ecological surveys have been completed, and no further surveys are required.

Lighting

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to hedgerow boundaries and ancient woodland and the buffer zone adjacent to the site. We advise that a condition will be required for the external lighting and will follow the recommendations within Bat Conservation Trust/ Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'.

Suggested condition wording is below:

Prior to first occupation of the dwellings, a lighting design plan(s) for biodiversity shall be submitted to and approved in writing by the local planning authority. The plan(s) shall include the following;

- *the identification of areas/ features on- site where disturbance could occur to biodiversity features such as ancient woodland plus buffer zone and bat roosting sites and/ or foraging/ commuting routes;*
- *the provision of appropriate, scaled plans(s) to show how and where external lighting shall be installed;*
- *the provision of technical specifications for the external lighting; and*
- *the provision of lighting contour plans to show expected lux levels on both the horizontal and vertical planes, so that it can be clearly demonstrated that areas to be lit shall not disturb the activity or relevant ecological receptors.*

All external lighting shall be installed prior to first occupation of the dwellings in accordance with the specifications and locations set out in the plan(s), and these shall be maintained thereafter in accordance with the plan(s).

We suggest that the below wording is included as a condition for a Construction Environmental Management Plan (CEMP – biodiversity), if planning permission is granted. This will mitigate for impacts to biodiversity, protect the ancient woodland and associated buffer zone and help ensure compliance with relevant legislation. The plan will include mitigation as outlined in the Preliminary Ecological Appraisal, Calumma Ecological Services, Oct 24. Suggested wording is below;

Prior to commencement of works, including site clearance, a construction environmental management plan (CEMP) will be submitted to and approved in writing by the local planning authority. The CEMP will be based on the recommendations in the Preliminary Ecological Appraisal, Calumma Ecological Services Oct 24 and include the following:

- a) the purpose and objectives for proposed mitigation works during construction;*
- b) the identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;*
- c) a detailed method statement to protect the ancient woodland (AW), 15m AW buffer zone and retained trees from pollution and adverse impacts;*
- d) the extent and location of proposed mitigation works shown on appropriate scale maps and plans, with reference to: pollution avoidance measures (noise, dust, lighting and run- off), protection of retained trees and hedgerows;*
- e) practical mitigation measures (both physical measures and sensitive working practices) to avoid or reduce impacts during clearance and construction for bats, hedgerows and breeding birds (may be provided as a set of species or habitat specific methods statements);*
- f) the location and timing of sensitive works to avoid harm to biodiversity features;*
- g) the times during construction when specialist ecologists need to be present on site to oversee works;*
- h) responsible persons and lines of communication.*

The approved CEMP will be adhered to and implemented throughout the construction period in accordance with the approved details”.

Biodiversity Net Gain (BNG)

Under the Environment Act 2021, and the Town and Country Planning Act 1990 (as amended), all planning applications for development (unless exempt), must deliver at least a 10% biodiversity net gain. Significant on- site gains, and all off- site gain, will need to be secured for at least 30 years.

The applicant has stated that they are exempt from BNG as these two proposed dwellings are self and custom build. The LPA need to be satisfied that this application meets that exemption.

Ecological Enhancements

Under section 40 of the Natural Environment and Rural Communities Act (2006) and paragraphs 187 and 193 of the National Planning Policy Framework 2024, biodiversity should be maintained and enhanced, including requiring an ecological enhancement plan to be submitted. We note that some enhancements have been outlined in the PEA and detailed on the proposed site block plan. A condition wording is suggested below;

“Within three months of work’s commencement, a detailed plan(s) showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the local planning authority. This will include a detailed landscaping plan using native species, planting plan with management measures, hedgehog highways and integrated wildlife features, including durable bat and bird boxes aimed at species of conservation concern. The approved measures will be implemented and retained thereafter”.

KCC Flood and Water Management

Received on 30 May 2025

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangements put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving one or more of the following;

- a) the winning and working of minerals or the use of land for mineral- working deposits;
- b) waste development;
- c) the provision of dwellinghouses where;
 - i) the number of dwellinghouses to be provided is 10 or more;
 - ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls with sub- paragraph c) i);
- d) the provision of a building or buildings where the floorspace to be created by the development is 1,000sqm or more; or
- e) development carried out on a site having area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

KCC Fire and Rescue

Received on 03.06.2025

Upon reviewing the plan drawings available, I note that although an existing situation, the access road leading to the proposed dwellings appears to be a dead end access route greater than 20m. Therefore, turning facilities should be provided in accordance with Table 13.1 of ADB Vol.1 to allow for fire appliance turning.

Please be aware that should this proposal be successful, it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under Section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Heritage

Received on 06.06.2025

The site lies within an area of multi- period archaeological potential. However, based on existing Historic Environment Record data for the area and the relatively limited extent of the proposed works, I consider it unlikely that these proposal would have a significant below- ground archaeological impact and have no further comments to make in this case.

Sustainable Development Officer

Received on 30/05/2025

The site is outside the Board's drainage district and although within a river catchment that drains into our district, the application proposal does not impact the Board's interests, and we have no comment.

This response is based on the information provided with the planning application and is reliant on its accuracy.

Kent Police Designing Out Crime Team

No comments received.

Lower Medway Intern Drainage District

No comments received.

Natural England

No comments received.

Neighbouring properties

6no. surrounding properties were consulted and a site notice was displayed on 11/06/2025. Six comments were received from members of the public, objecting on the following grounds;

- it would appear that the gradient of the land adjoining Willow Wood House does not match the current property profile, it having been levelled prior to the application;
- it would appear that the footprint of the proposed detached garage is extremely large and out of proportion with the dwellings and could be the subject of a further application, to which I would object;
- the proposed garage would appear to include hardstanding in front of the proposed dwellings, for six vehicles. This is not acceptable, out of context and not in keeping with the footpath location at this part of Willow Walk, and leaves little room for greenery;
- the proposal would be detrimental to the neighbourhood's character;
- there is a lot of pedestrian traffic passing this site and the additional traffic that may arise from the development may be a safety hazard;
- the vehicular access to the west and rear of the dwellings is not being considered as part of the application;
- a greater sense of shading and enclosure would result from the proposal; and
- the development would cause additional deterioration to the already frail footpath and may expose utility pipes. This would represent a safety risk.

Officer's Analysis

Site Description

Bluebells is a detached bungalow located on the northern side of the road.





The principal considerations in the assessment of this application are:

- Housing Need
- Location
- Density of Development
- Affordable Housing
- Design and Impact on Listed Buildings
- Amenity of Future Occupiers
- Neighbouring Amenity
- Parking and Highways
- Biodiversity

This application differs from the previous, refused one, in the following ways;

- Amended roof form with steeper roof pitches and altered front and rear dormer windows, to both dwellings
- Removal of rear terrace of dwelling on plot A
- Amended location of refuse and recycling stores for both plots
- Amended bedroom sizes for both plots

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath re- emphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states 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 a 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 March 2023. It demonstrates that based on data up to the period 2022-

2027, the Council can only demonstrate a land supply of 2.9 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 as being out of date, as required by 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 the Framework that protect areas or assets of particular importance provides a strong 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well- designed places and providing affordable homes, individually or in combination.

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

- habitats sites (and those listed in NPPF paragraph 189)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- National Landscape
- Irreplaceable habitats
- Designated heritage assets (and other heritage assets of archaeological interest, see NPPF footnote 75)
- 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 130(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 one residential unit would offer a minimal contribution towards meeting this local need and, accordingly, officers consider this should be accorded appropriate weight in support of the application. However, this has to be balanced against other requirements of the development plan and the NPPF (2024) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create a high standard of amenity for existing and future occupiers.

Location

The application is located inside the Rural Settlement inset from the Green Belt. Policy CS02 (Scale and Distribution of Development) identifies that in such areas, development will be supported. As a Third Tier Settlement, Culverstone Green is on the mid- tier of sustainable locations in the borough.

4.2.4 The Council has carried out an assessment of the facilities and services available in the Borough's settlements to identify which are more sustainable. The results are reflected in the settlement hierarchy below.

Table 2: Settlement Hierarchy

First Tier Settlements:	Gravesend/Northfleet/Ebbsfleet, i.e. the urban area
Second Tier Settlements:	Istead Rise, Hook Green Meopham, Higham
Third Tier Settlements:	Culverstone Green, Meopham Green, Vigo
Fourth Tier Settlements:	Cobham, Shorne, Sole Street
Other Settlements:	Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway, Three Crutches

Source: Settlement Hierarchy Technical Paper December 2009

The Council's Settlement Strategy

It is considered on balance that the location of the proposed development is sustainable in principle, particularly given the neighbouring residential development previously undertaken. Locationally, the development would be acceptable in principle. However, all other matters also need to be considered.

Density of Development

Development on the site should meet the requirements of Policy CS14 (LPCS), where the Council expects new housing development to provide a range of development types and sizes, taking into account the existing character of the area. Policy CS15 (LPCS) requires that all new housing will be developed at a density which is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. These policies will be considered and assessed against the proposal later in this report.

In the Rural Area, Policy CS15 (LPCS) requires that housing provide a minimum density of 30 dwellinghouses per hectare (dph). The site has an area of 1,227sqm: the provision of two houses on it would be at a density of 16.3 dph (against a current density of 8.15 dph). This is below the minimum density required. However, it would be in keeping with density of the dwellings along Willow Walk and it would maintain the line of dwellings along the road and would be acceptable in this regard too. Therefore, the proposed development would be acceptable, in accordance with Policies CS14 and CS15 of the LPCS (2014).

Design, Character and Appearance

The application site comprises a single bungalow. Such buildings are often evident in rural locations as is the case along Willow Walk, although not exclusively. There are a large number of bungalows along the road, including chalet bungalows. However, there are also a number of two storey dwellings along the road and therefore, such buildings are not unacceptable in principle in this location. The two storey dwellings along the road are dispersed amongst and between the bungalows/ chalet bungalows along the south-eastern half of the road. They are of a mixed design. Rural areas such as this have carefully designed two storey buildings which use simplified roof forms, with low sloping eaves and dormer windows, carefully positioned within the roofline.

The following examples are Google Maps images of the variety of two storey dwellinghouses in the area;



16 Willow Walk



Little Oak (27 Willow Walk)



15 Willow Walk



1 Willow Wood Road

As can be seen, all but one of the examples have low sloping eaves lines and use dormers to provide windows for the first floor rooms. At Little Oak, although the roofline does not slope below the first floor windows, it is overall a relatively low form in height and is set back some distance from the road, on a site that slopes down from the road. It is therefore not as prominent as other two storey dwellings along the road. A number of the bungalows along the north- western part of the road have front dormer windows too.

The front elevations of the proposed dwellings are shown below for information;



The proposed development would result in two dwellinghouses on the site instead of one. The proposed dwellings would be of greater bulk and massing than the existing bungalow and would fill a greater amount of the width of the plot than the existing bungalow, by virtue of their two storey nature and their being built close to both flank boundaries of the site. However, the development's bulk and scale would be broken up

to a degree as it would comprise two detached dwellings with staggered front elevations. The increase in the built form on the site would be evident when approaching the site from the south- east and to a lesser degree from the north- west (due to the presence of a few well- established trees to the front the neighbouring dwellings (to the north- west; though in the winters months, when the trees are bare of leaves, the dwellings would be more noticeable from this direction). However, they would not be the only two, two storey dwellings directly adjacent to each other along the road and they would have a roof pitch similar to those of a few other two storey dwellings there. While they would be sited close to each other and to the chalet bungalows (with bulky roofs) either side of the site, their hipped roofs would provide sufficient a reduction in their bulk and massing to ensure that they would have an acceptable impact upon the character and appearance of the site and the street scene. The visual impact of the proposed development would be acceptable, in accordance with the requirements of the Design for Gravesham – Design Guide (2024), Policy CS19 of the Gravesham Local Plan Core Strategy 2014 and paragraph 135 of the National Planning Policy Framework (2024), in terms of design, character and appearance.

The proposed dwellings would virtually fill the full width of the plot and while the submitted plans indicate a large expanse of hardstanding to each plot, there would nevertheless be the opportunity for some landscaping. This would help assimilate the development into the street scene.

The proposed level of hardstanding would not be dissimilar to that exhibited at some of the nearby dwellings (including those on the opposite side of the road). It would not be harmful to the street scene.

Amenity of Future Occupiers

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users of a site. The impact on amenity is also considered with regard to the criteria in Policy CS19 (LPSC), which states that new development should be located, designed and constructed to safeguard the amenity, privacy, sunlight and daylight of its occupants and those of the neighbouring properties and land. The impact upon neighbours will be assessed in the next section of this report.

The following table compares the internal spaces proposed against the minimum space standards contained in the Council's Residential Layout Guidance SPD (2020).

Room Type	Proposed Internal Floor		Minimum Space Standard (sqm)
	Plot A	Plot B	
Living Room	27.5	26	13.2
Lounge/ Diner	18.5	73	18
Kitchen/ Dining Room	12.5	73	12
Bathroom and WC	5.75	5.75	3.6
Double Bedrooms	5 bedrooms all above 11.2 sqm	3 bedrooms all above 11.2 sqm (the other bedroom is a single)	11.2

It should be noted that the kitchen/ dining and lounge areas for the dwelling on plot B are combined at 73 sqm, which is above the minimum space required for the rooms combined

The following table compares the external spaces proposed against the minimum space standards contained in the Council's Residential Layout Guidance SPD (2020).

Garden Measurement	Proposed Internal Floor		Minimum Space Standard (sqm)
	Plot A	Plot B	
Area	193	226	100
Depth	22.4	18.4	10

The above tables demonstrate that the proposed dwellings would comply with the minimum space standards contained in the Council's Residential Layout Guidance (2020).

Neighbouring Amenity

It is important that any new development safeguards the amenity of the neighbouring occupiers. A number of objections have been received about the proposed development and these shall be considered here, together with the overall amenity impacts that would arise from the proposed development.

The neighbouring properties most likely to be affected are those either side of the application site, no. 41 Willow Walk (Land East of Willow Wood House; to the north- west of the site) and no. 45 (Woodview Cottage; to the south- east of the site).

Plot A (adjacent to 41 Willow Walk) would have two ground floor windows (one primary, serving a bedroom; one secondary, serving a living room) facing 41. There would also be two windows at first floor level, both serving en- suite bathrooms. There are two windows at first floor level in the flank elevation of the dwelling at 41 facing the application site (and none at ground floor level). While it is not known which rooms these windows serve, given that the proposed first floor windows in the dwelling on Plot A would be obscure glazed to 1.7m above finished floor level (by condition), there would be a 1.8m high close board fence between the dwellings, and the proposed rear- facing first floor windows would not overlook the area immediately to rear of the dwelling at 41 Willow Walk, the proposed development would not result in a harmful level of overlooking or loss of privacy for this dwelling.

Plot B (adjacent to 45 Willow Walk) would have four ground floor windows (one primary, serving a living room; three secondary serving a kitchen/ dining/ living room and a TV/ cinema/ games room/ gym/ workshop). There would also be one window at first floor level, serving an en - suite bathroom. There are four windows in the flank elevation of 45 facing the application site – two at ground floor level, two at first floor level (it is not known which rooms these windows serve). The first floor window and the ground floor windows in the proposed dwelling on Plot B would be obscure glazed to 1.7m above finished floor level (by condition) in order to prevent an undue degree of overlooking of 45. However, as the proposed rear- facing first floor windows would not overlook the area immediately to the rear of the dwelling at 45 due to the relationship between the properties, the proposed development would not result in a harmful level of overlooking or loss of privacy for this dwelling.

The windows in the inside- facing elevations of the two proposed dwellings would serve a bathroom, a hall, and dining room and living room (ground floor level), and a hall/ stairwell (first floor level) on Plot A, and a shower and utility room (ground floor level) and a stairwell (first floor level) on Plot B. All these windows could be obscure glazed and fixed shut and 1.7m above finished floor level (by condition). Loss of amenity would not arise in this regard.

The front door of the dwelling on Plot A would be in its flank elevation, looking across the front of the dwelling on Plot B. This would not be harmful to amenity due to the relationship between the dwellings.

It is considered appropriate to prevent the use of the flat roof of the single storey rear projection of the dwelling on plot B as a terrace/ sitting out area in order to protect the privacy of the occupiers of the neighbouring dwellings. This may be achieved by condition.

It is not considered that the proposal would result in an undue level of enclosure or shading for the neighbouring dwellings due to the depths of the proposed dwellings and their relationship and orientation to the neighbouring dwellings.

None of the other nearby or surrounding dwellings would be unduly affected by the proposed development due to the distances involved.

The proposed dwellings would have staggered rear elevations and the dwelling on Plot A would extend forward of that on Plot B by around 2m. This forward projection would not have an adverse impact upon the outlook or amenity of the occupiers of Plot B due to the relatively limited degree of projection. The extent of the single storey rear projection to the dwelling on plot B would not be that significant (7.99m) that it would have a harmful impact upon the amenities and outlook of the dwelling on plot A. While a little overshadowing across the front elevation of the dwelling on Plot B would result due to the orientation of the dwellings, this would be limited and would not be harmful to amenity, particularly as the nearest element of

the ground floor of that dwelling is the front door and the pitched roof of the dwelling on Plot A. A little overshadowing of the neighbouring dwelling at 45 Willow Walk would also result, though it is not considered that this would be harmful to amenity.

Whether there have been any alterations to the gradient of the land adjoining Willow Wood House is not known and was not evident at the Case Officer site visit.

Parking and Highways

The proposal is for one five bed and one four bed dwelling. The Kent County Council Parking Standards stipulate that each of the dwellinghouses have three parking space to comply with the standards. The proposed block plan indicates three parking spaces for each of the dwellinghouses would be provided, though with three cars parked in the front gardens, there would likely be insufficient space for the cars to be able to turn and leave the properties in forwards gear. However, as the part of Willow Walk along which the site is located is a dead end (and therefore cars travelling along it do so at low speed) and there would be suitable visibility splays at the exits from the site, cars reversing onto the road would not be at undue danger or risk of causing an accident.

KCC Highways did not provide any comments for the application and have not raised objection to it.

Kent County Council's Cycle Parking Standards require once space per bedroom, in residential developments – nine spaces for this proposal. The proposed block plan indicates secure cycle parking to the side of each dwelling, which would likely provide adequate space for the bicycles. However, given the position of the refuse stores and with cars parked on the site, it is not clear whether bicycles would be able to easily and conveniently access the cycle parking spaces.

However, the Cycle Parking Standards are maximums and so two cycle spaces would likely be sufficient for each property. The location of such spaces, including access to them, may be clarified by condition.

Adequate car and cycle parking provision would therefore be provided on the site in accordance with paragraphs 109- 114 of the NPPF, Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Local Plan Core Strategy 2014, subject to further details of the cycle parking provision.

Third party concerns have been raised about the level of pedestrian traffic passing this site and the additional traffic that may arise from the development being a safety hazard, and that the development would cause additional deterioration to the already frail footpath and may expose utility pipes, representing a safety risk. However, suitable visibility splays would be provided for the site and harm to pedestrian safety is therefore considered to be limited, while the concern over the degradation of the road is considered to be overstated.

KCC Biodiversity

Biodiversity Net Gain

KCC Biodiversity have stated that *"We are satisfied that sufficient ecological surveys have been completed"*. They recognise the presence of ancient woodland to the rear of the site and state that no development must be within a 15m buffer of the woodland. The plans submitted with the application indicate this would be the case – the 15m buffer is outlined in blue on the site location plans, with the remainder of the site in red. The response from KCC Biodiversity states *"it is not best practice to have an ancient woodland buffer zone within a rear garden, but as this is an existing rear garden we accept that there could be no change in this case, if measures are in place for the protection of ancient woodland and associated buffer zone, including soils"*.

Under the Environment Act 2021 and supporting statutory instruments, Biodiversity Net Gain (BNG) is mandatory for most development. The legislation requires a minimum 10% gain in biodiversity from acceptable development, either on- site, off- site or a combination of both. BNG provided under the mandatory requirements off- site and significant BNG on- site must be secured by a legal agreement for 30

years under an approved Habitat Management and Monitoring Plan.

There are strict requirements in terms of what an application must contain in relation to BNG before it can be accepted as valid, as set out in Schedule 7A (Biodiversity Net Gain in England) of the Town and Country Planning Act 1990. This requires a completed metric calculation tool showing the calculations of the pre-development biodiversity value of the on-site habitats on the date of the application, and other information.

However, there are a number of exemptions from the BNG regulations;

- householder development, as defined in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015;
- development granted planning permission by a development order under section 59. This includes permitted development rights;
- development subject to the de minimis exemption – development that does not impact a priority habitat and impacts less than 25 sqm of habitat, or 5m of a linear habitat such as a hedgerow;
- self-build and custom-build development – development that comprises
 - no more than nine dwellings; and
 - is carried out on a site that is no larger than 0.5 hectares in size; and
 - consists exclusively of dwellings which are self-build or custom-build, as defined in section 1(A1) of the Self Build and Custom Housebuilding Act 2015.

Self-Build

The application has been submitted with a BNG self-build form, indicating that the applicant would undertake the building works themselves. The self-build of a development consisting of no more than nine dwellings, on a site that has an area less than 0.5 hectares meets the definition of self-build housing in section 1(A1) of the Self-build and Custom House Building Act 2015.

The glossary of the NPPF (2024) defines self-build and custom-build housing as;

“Housing built by an individual, or a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-Build and Custom House Building Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act”.

The Self-Build and Custom Housing Building Act 2015 (as amended) further elaborates that self-build housing is not *“the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person”*.

This application seeks to construct two dwellings: their proposed construction is considered to meet the definition of self-build. Therefore, no additional information is required under Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for BNG.

Protected Species

A Preliminary Ecological Appraisal and a Preliminary Roost Assessment for bats have been submitted with the application. They conclude the site is negligible for the presence of bats and the presence of most other species would be unlikely. Hedgehogs however, may be sheltering or commuting in the area. Precautionary mitigation can be included in a condition for a Construction Environmental Management Plan. Given the proximity of the site to ancient woodland, a sensitive lighting strategy would be required by condition too.

Ancient Woodland

The application site is adjacent to an area of designated ancient woodland. Paragraph 193 of the NPPF (2024) states;

“Development resulting the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

Comments from KCC Biodiversity state there is an existing structure on the site and the 15m ancient woodland buffer is located in the existing garden area of the application site. The comments explain the buffer zone should be 15m from development including garden areas. However, in this case, there is an existing garden area in the 15m buffer. KCC Ecology Advisory Service conclude that the existing garden use within the buffer is not deal but accept that it could not be changed. Conditions to include the prevention of construction materials being stored in this zone and a CEMP would assist in limiting the impact upon the ancient woodland.

The condition suggested by Southern Water regarding the proximity of landscaping proposals in proximity to Southern Water public apparatus in noted. However, it is considered that this may be included in the landscaping condition for the site, rather than a separate condition.

Conditions for matching materials, the removal of permitted development rights for extensions and outbuildings and the insertion of openings in the flank elevations of the dwellings, the submission of details of hardsurfacing and boundary treatments and landscaping, drainage and sewerage, lighting, a Construction Environmental Management Plan and refuse and recycling facilities are considered appropriate and necessary in order to ensure the development has an acceptable impact in terms of character and appearance, amenity and on protected species.

Conclusion

The proposed dwellinghouses would have an acceptable impact on the character and appearance of the site and the street scene as they would be compatible with the established rural character of the area. The dwellings would provide a suitable living environment for their future occupiers while not adversely harming the amenities of the occupiers of the neighbouring and surrounding dwellings. Harm to highway safety would not arise from the development. Biodiversity net gain issues would not arise from the scheme as the development is to be self- build.

The proposed development is therefore considered to be acceptable, in accordance with the requirements of the Design for Gravesham – Design Guide (2024), Policies CS14, CS15 and CS19 of the Local Plan Core Strategy 2014 and the National Planning Policy Framework (2024).

Recommendation

The recommendation is to approve this application.

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

Case Officer:	Mr Tom Gabriel	Team Leader:	Richard Hart
Signed:	TM Gabriel	Signed:	<i>R Hart</i>
Dated:	29th August 2025	Dated:	3rd September 2025