

Delegated Report

Full Planning Application

Planning Application No: 20260037

Location: 105 London Road Northfleet Gravesend Kent

Description: Conversion of a dwellinghouse into two 3 bedroom flats. Erection of a single storey rear extension and conversion of loft space to habitable rooms with rear dormer roof extension.

Applicant: Mr Luke Moore

Site Visit Date: 6th February 2026

Submitted Documents/Plans

Planning Application Form;
Drawing No. B001 – Block Plan;
Drawing No. E001 – Existing Floor Plans;
Drawing No. E002 – Existing Floor Plans;
Drawing No. E003 – Existing Front Rear Elevation;
Drawing No. E004 – Existing Side Elevations;
Drawing No. E005 – Existing Section;
Drawing No. P001 Rev A – Proposed Floor Plans;
Drawing No. P002 Rev A – Proposed Floor Plans;
Drawing No. P003 Rev A – Proposed Front Rear Elevations;
Drawing No. P004 Rev A – Proposed Side Elevations;
Drawing No. P005 Rev A – Proposed Section;
Drawing No. P006 – Proposed Section;
Drawing No. P007 – Proposed Front Elevation (Details);
Heritage Statement; and
Covering Letter.

~~Drawing No. P001 – Proposed Floor Plans;~~
~~Drawing No. P002 – Proposed Floor Plans;~~
~~Drawing No. P003 – Proposed Front Rear Elevations;~~
~~Drawing No. P004 – Proposed Section;~~
~~Drawing No. P005 – Proposed Section;~~

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS14 – Housing Type and Design
- CS15 – Housing Density

- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed and beautiful places
- Section 16 – Conserving and Enhancing the historic environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Overcliffe Conservation Area Appraisal (2009)

Other material considerations

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Consultations, Publicity and Representations

Consultees

GBC – Environmental Protection

We have no comments with regards to this application.

GBC – Waste Management

As the property is two 3-bedroom flats, I would expect to see the following bin provision

- 2 x 180ltr bin for residual
- 2 x 240ltr bin for recycling
- 2 x 23ltr food caddies

This will allow for a set of bins per flat and ensure sufficient bin storage.

Gravesham Borough Council operates a fortnightly collection of refuse and recycling and a weekly collection of food waste. If weekly collections are required then there will be a charge made to the building owner.

As the application relates to a business, then it is down to them to arrange for a third party contractor to collect the waste on the required frequency.

Neighbouring properties

The application was publicised by the displaying of a site notice, together with individual letters sent to nine surrounding properties with an overall expiry date of 27th February 2026. One letter of objection was received with the following summarised comments:

- Do not need to convert dwellinghouse to into 3 bedroom flats;
- Disruption – construction vehicles, skips, pavement closure;
- Noise;
- Dust;
- Extension out of place with other houses in the area.

Officer's Analysis

Proposal

This application seeks permission for the Conversion of a dwellinghouse into two 3 bedroom flats. Erection of a single storey rear extension and conversion of loft space to habitable rooms with rear dormer roof extension.

The application property is an existing large semi-detached single dwelling, located in the urban area of northfleet along the main London Road. The property is located within the

The proposal includes the conversion of the existing garage to the side, single store rear extension, together with a single rear dormer, to facilitate the change in floor layout to create 2no. three bedroom flats, each with garden areas with cycle stores and bin store to the front.

Flat 1 would be accessed from the front and is a 5 person unit with open plan lounge/kitchen/dining area, en-suite to bedroom 2, separate shower room and storage. Flat 2 is accessed from the rear of the building and is a duplex unit with a double bedroom with en-suite in the roofspace served by the proposed dormer, with two single room, open plan lounge/kitchen/diner and shower room on the first floor.

Existing Elevations



FRONT ELEVATION



REAR ELEVATION

Proposed Elevations

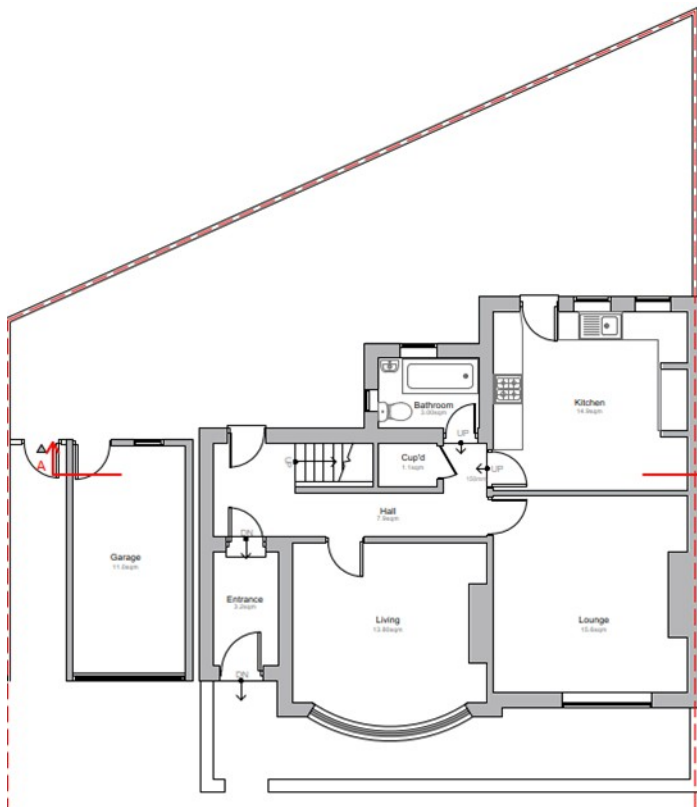


FRONT ELEVATION

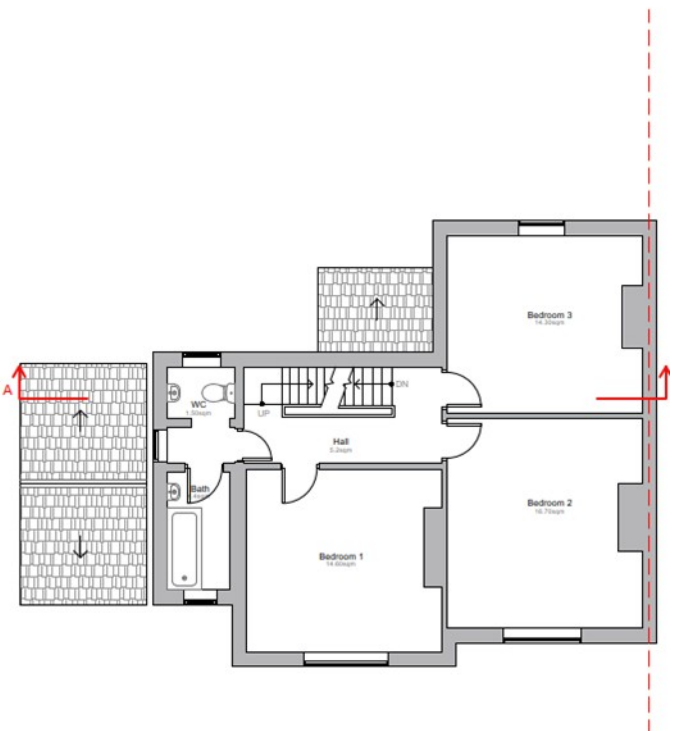


REAR ELEVATION

Existing Floor Plan

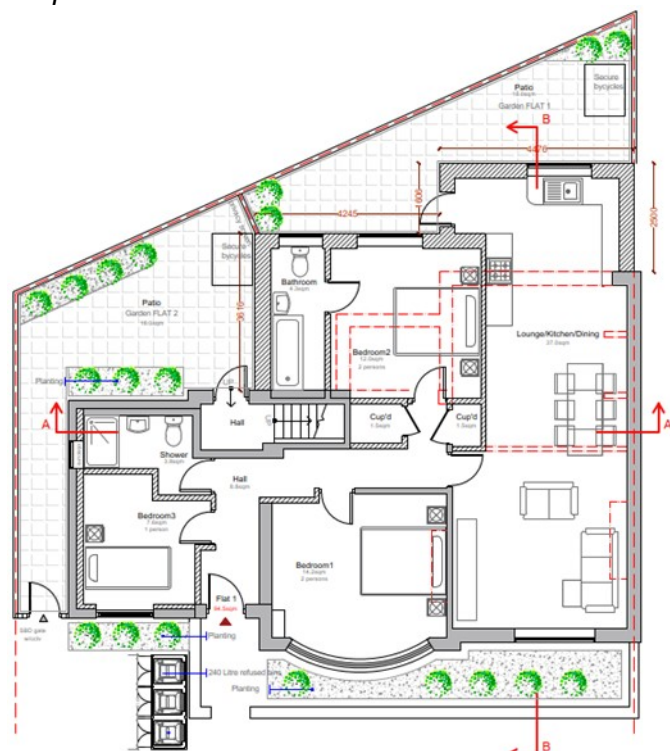


GROUND FLOOR
GIA = 66.2sqm

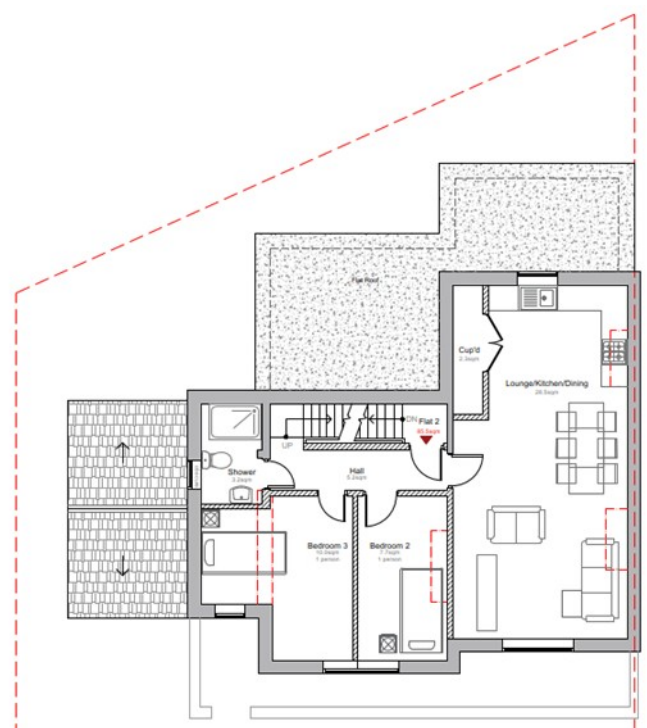


FIRST FLOOR
GIA = 63.5sqm

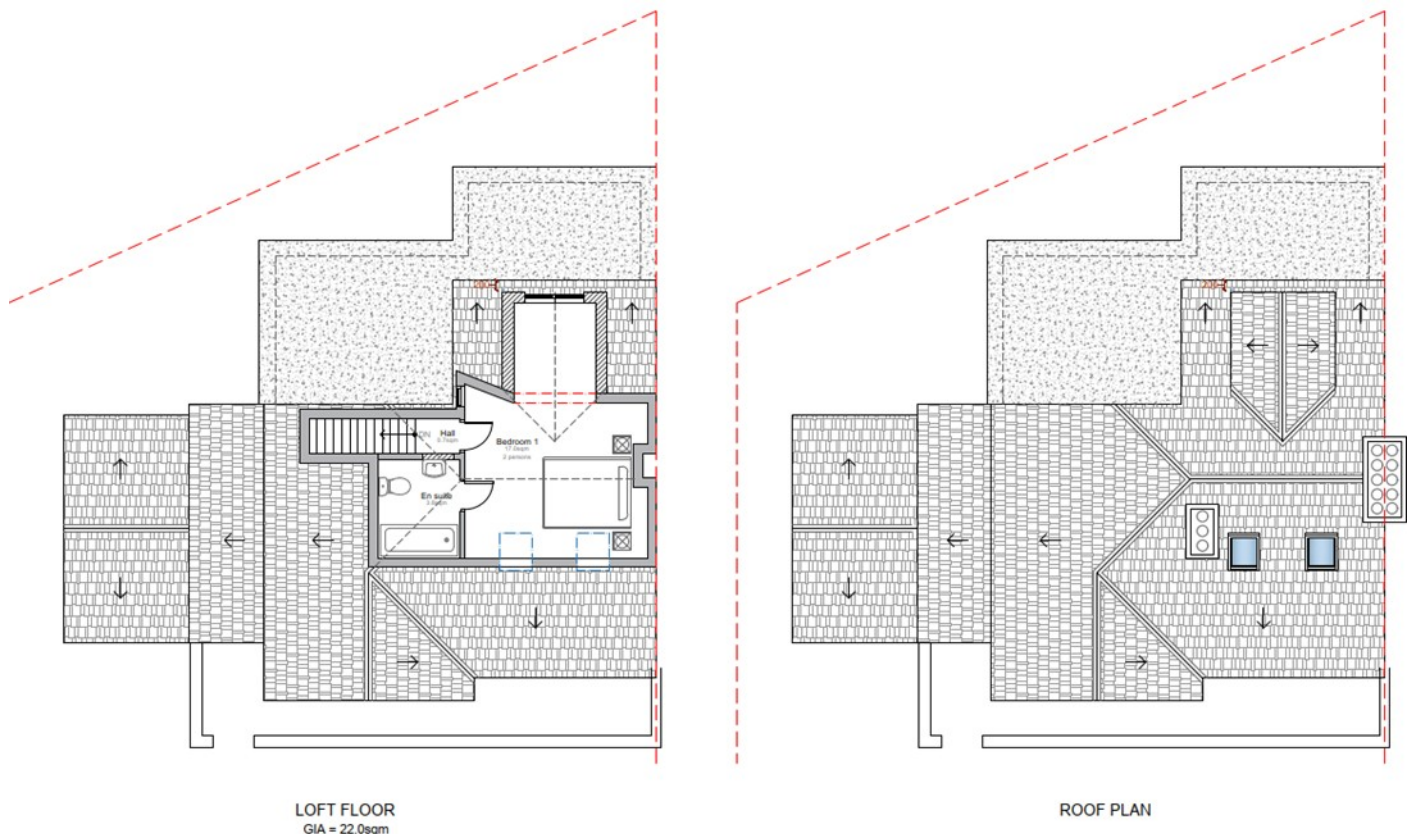
Proposed Floor Plans:



GROUND FLOOR
GIA = 98.5sqm



FIRST FLOOR
GIA = 63.5sqm



Housing need

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

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

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023, it demonstrates that based on data up for 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 to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a 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 Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);
- and areas at risk of flooding or coastal change.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land, 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.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the NPPF and established local planning policy taken as a whole.

Principle Issues

The site lies within the urban boundary of Gravesend and within the Overcliffe Conservation Area. With the exception of being in an archaeological notification, due to the built-up nature of the site there are unlikely to be any significant below-ground archaeological impacts. As such, the main issues for consideration in the determination of this application are as follows:

- Design, character and appearance
- Residential amenity
- Parking and highways

Design, Character and Appearance

Section 12 of the NPPF 2024 relates to achieving well-designed and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

Policy CS20 of the Core Strategy states that the Council will accord a high priority towards the reservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place.

The property lies within the urban boundary and comprises of an existing two storey residential dwelling.

Front Elevation:



View of Rear Elevation from Thames Way:



The proposal includes the conversion of the existing building from a single residential dwelling into two flats.

In terms of external alterations to the front, the garage is a later addition and due to its size is not fit for purpose. The proposed conversion incorporates a window that would reflect the windows of the existing property. The new rooflights are conservation rooflights and are acceptable in their setting. To the rear the single storey rear extension would not be highly visible from public vantage points and is a modest addition in its context. The rear dormer is a single gable design which would match that of the adjoining property. Therefore in terms of external alterations, the proposal are considered acceptable in their context and would not detract from the character of the property or the Overcliffe Conservation Area.

Overall, the proposal is considered to be appropriate in its context, and would respect and enhance the character and appearance of the area and would not detract from the Overcliffe Conservation Area. As such, the proposals would comply with the requirements of Policies CS19 and CS20 of the Core Strategy 2014.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). Paragraph 198 of the NPPF 2024 seeks to ensure that new development takes into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land and avoid adverse impacts from pollution.

Future Occupiers

The Nationally Described Space Standard (NDSS) 2015 sets out the minimum gross internal floor area (GIFA) standard for new dwellings. The table below shows the minimum standard set out in the NDSS 2015 against the size of the proposed flat within the development:

Number of bedrooms (b)	Number of bedspaces (persons)	Minimum m²	Proposed flat GIFA (m²)
3b	5p	86 (single storey)	Flat 1 94.5
3b	4p	84 (duplex)	Flat 2 85.5

It is considered that the proposal would comply with the Technical Housing Standards - Nationally Described Space Standards in terms of the size of the proposed accommodation for the 3 bedroom units proposed.

In addition, in relation to the more up-to-date Council standards set out in the Residential Layout Guidelines SPD (2020), the proposed room sizes would be acceptable in relation to the bedroom (in excess of the 11.2m² and 6.5m² standard for a double and single respectively). Both units are laid out with open plan living/kitchen/diner, which measure 37m² for Flat 1 and 28.5m² for Flat 2. Whilst there is no standard for living/kitchen/diner, there is a minimum of 12.0m² for kitchen/diner and 18m² for lounge/diner. Taking this into account, it is considered that the proposed floorspace would therefore be capable of accommodating the furniture and fittings that would normally be associated with the use of this space, in compliance with the requirements of the SPD. Overall, the floorspace is considered to be acceptable in relation to amenity standards.

All habitable rooms have good access to outlook and natural light.

The area is mixed used commercial and residential and it is therefore considered that the living conditions of any future occupants would not differ from the existing surround residential dwellings.

Waste storage for the properties would be located to the front of the building to allow for kerbside collection and as such would comply with Policy CS19 of the Core Strategy 2014, which requires new development to incorporate facilities for the storage and recycling of wasted generated. The details of the bin store should be conditioned to be carried out as approved.

Neighbouring Properties

In terms of the impact on neighbouring properties, the property is already in use as a residential dwelling, therefore there would no material change in terms of use. The existing property is a 3 bedroom dwelling which are all large double bedrooms and therefore has the capacity for up to 6no. residents. The proposal would have the potential for 9no. residents, however as three of the bedrooms are singles and the units being 3 bedroom dwellings, some of the residents are expected to be children. Overall it is considered to not be materially different to the existing.

In relation to the proposed single storey rear extension and the impact on privacy and outlook, the proposed extension would only project 2.5m from the rear of the existing elevation and would have a height

of 3m. Therefore there would be no loss of outlook or overshadowing from the extension.

With regard to the rear dormer, this is similar to the dormer of the adjacent property and would afford the same views as the existing rear windows of the property. As such, there would not be any additional or unacceptable overlooking or loss of privacy to the residents of the adjoining property.

With regard to the private amenity, both flats would have a rear private amenity area which both incorporate cycle storage and as such, the occupants would have access to sufficient private space and natural light.

On this basis, the proposal would comply paragraph 135, 198 and 200 of the NPPF 2024 and Policy CS19 of the Core Strategy 2014 in respect of amenity.

Noise

The proposal is for one additional residential unit located in a building that is already of residential use. Therefore there is no objection to the proposed use or the impact on existing or future occupiers of the application property or the adjoining property.

Parking and Highways

The application property currently has a small garage to the side and small drive to the front. The proposal seeks to convert the garage to increase the floor area of Flat 1. As such, the proposal would be a 'no parking scheme'. The site is located along the main London Road with access to a variety of shops and services and because the site is accessible by public transport, there would be no significant adverse impact on highway safety or parking as a result of the proposal, which would be in line with Policy CS11 of the Core Strategy 2014 and Saved Policy P5 of the Local Plan 1994. To support this, there have been no objections in relation to parking from neighbours.

Cycle storage has been accommodated in the rear amenity areas of both flats and a condition will be imposed to ensure that they would meet the minimum rate of one space per unit (as per the standards in SPG4).

Any Other Material Planning Considerations

Birds

As the application site is within 6km of the Thames Estuary and Marshes SPA/Ramsar Sites and would provide additional residential accommodation, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. On this basis a tariff of £337.49 is required every additional dwelling proposed on the site.

The applicant has signed a SAMMS Contribution Agreement and paid the appropriate tariff for the development, which would meet the requirements of paragraphs 187 and 194 of the NPPF 2024 and Policy CS12 of the Core Strategy 2014.

Biodiversity Net Gain (BNG)

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

In this case, the proposed development is covered by an exemption: it is a development below the threshold as it does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. There is no existing ‘habitat’ on the site, and any space that could be used as such measures 10m². BNG is therefore not required in this case.

Conclusion

The proposals are acceptable in terms of the design and impact on the application building and the character and appearance of the surrounding area, and with regards to residential amenity and highways and parking matters. The proposals would therefore comply with the requirements of Policies CS11, CS19 and CS20 of the Core Strategy 2014, saved Policies T1 and P3 of the Local Plan 1994, and paragraphs 116, 131, 135, 198 and 200 of the NPPF 2024.

Recommendation

The application is accordingly recommended for permission with conditions.

(For detailed conditions and informatives, see draft Decision.)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	25 th March 2026	Dated:	27th March 2026