

Delegated Report

Householder Planning Application

Planning Application No: 20250524

Location: 32 Jubilee Crescent Gravesend Kent DA12 4JF

Description: Conversion of the garage into an annexe ancillary to the main house.

Applicant: Dee Clarke

Site Visit Date: N/A

Procedural Matters

During the course of the assessment of the application, it was noted that the conversion of the garage has already been carried out, as set out within the statement accompanying this application. As such, the description of the development, along with the plans submitted- are incorrect. Notwithstanding this, the Local Planning Authority (LPA) are not looking to support the proposal, and revised/additional information was not sought. In this instance, it was considered beneficial to set out the LPA position within the report below.

Submitted Documents/Plans

Application Form;
Supplementary Information – Design and Access Statement;
Drawing No. A.01 – Site Location Plan;
Drawing No. A.02 – Block Plans – Existing and Proposed;
Drawing No. A.03 – Floor Plan and Roof Plan – Existing;
Drawing No. A.04 – Floor Plan and Roof Plan – Proposed;
Drawing No. A.05 – Elevations – Existing; and
Drawing No. A.06 – Elevations – Proposed.

Relevant Planning History

No relevant history.

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
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

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 5 – Delivering a sufficient supply of homes
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

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

Consultations, Publicity and Representations

Consultees

Local Ward Councillors

No comments received.

Neighbouring properties

Five surrounding properties were consulted and one representation was received in support of the proposal. The overall consultation period expired on 10.07.25.

The comment in support of the proposal is described as being from a member of the public and is summarised below:

- Ancillary and modular accommodation makes efficient use of existing residential plots, supports flexible and multigenerational living, and offers a sustainable response to housing and care needs without necessitating large-scale new development.
- The proposed annexe is clearly ancillary in nature.
- The conversion of the garage minimises built form.
- It is important that the ancillary use is secured through appropriate conditions.
- We encourage Gravesham Borough Council to consider the adoption of supportive annexe policies in future iterations of the local plan.



Application Proposal Context

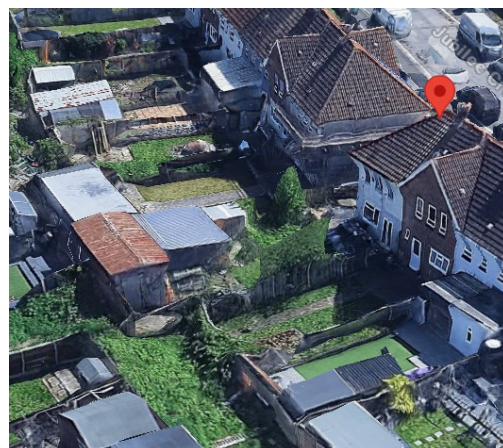
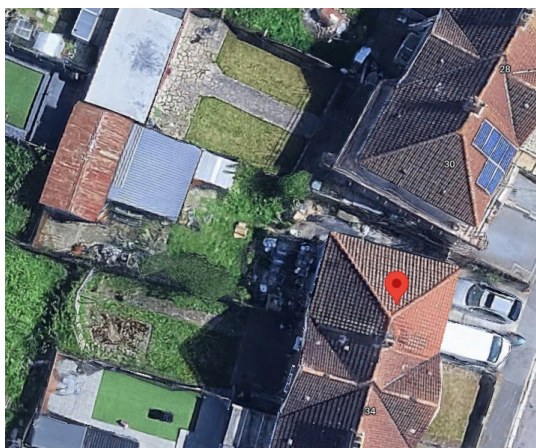
Notwithstanding that the annexe is existing, this application; described as '*conversion of the garage into an annexe ancillary to the main house*', follows a pre-application enquiry for the proposed '*subdivision of the property into two forming a new dwelling 1-bedroom bungalow house at the rear with independent access*'. The proposed ground floor plan for this application, incorporating an open plan living room/kitchen area, a bedroom and a bathroom (incorrectly annotated as bedroom) is the same plan layout as what was submitted for the pre-application enquiry for the one bedroomed bungalow.

As previously mentioned, the statement accompanying this application refers to the continued use of the annexe, stating that the annexe has historically been used by family members and forms part of the overall planning unit of the main dwelling. This application is to formalise the use of the annexe and confirm its ancillary relationship to the host property. It therefore stands to be assessed whether the proposed development would fall under the description of an annexe, or not. This consideration shall be made in the relevant section of the report below.

Site Description

No. 32 Jubilee Crescent is a two-storey end of terrace dwelling. It has a side access leading to the rear garden where there are outbuildings in the rear garden. There is a vehicular accessway to the rear of the property which is accessed off of Hampton Crescent (the road to the rear) which serves a number of garages to the rear of the properties in Jubilee Crescent and Hampton Crescent. The site is in a residential area where there are surrounding terraced and semi-detached dwellings.

Google Images



Officer's Analysis

As set out in the application context above, it first needs to be considered whether the proposed development can be considered to be an annexe.

Whether the proposed annex would be ancillary to the host dwelling

As stated, No. 32 Jubilee Crescent is a two-storey end of terrace dwelling. It has a side access leading to the rear garden where there are outbuildings. There is a vehicular accessway to the rear of the property which is accessed off of Hampton Crescent (the road to the rear).

The proposal on the application form is 'conversion of the existing garage into a granny annexe that will remain ancillary to the main house and not be used as a separate dwelling.' However, this contradicts the plans which includes all the facilities for a self-contained dwelling.

There is no specific local or national planning policy that directly relates to the provision of extensions or buildings as annexes. However, there are emerging policies in the Regulation 18 (Stage 2) Development Management Policies Document (2020), including RES 3: Residential Annexes, that show the direction of travel the Council is going and such emerging policies may be accorded some limited weight.

By way of general guidance, a proposed annex should (where possible):

- Be subordinate to, and used in connection with, the main dwelling and must not be able to function without the main dwelling (for example, not having separate kitchen facilities).
- Be interconnecting with the main dwelling as a whole (for instance via doorways); if accessed by a separate external entrance this should not separate from the main dwelling and therefore should rely on a common shared access with the main dwelling.
- Be within the curtilage of the main dwelling.
- Have a functional connection with the main dwelling (e.g. the occupant should be a dependant relative of the residents of the main dwelling or employed at the main dwelling).
- Be in the same ownership as the main dwelling.
- Be designed in such a way as to easily allow the annex to be used at a later date as an integral part of the main dwelling.
- Have no boundary demarcation or subdivision of the garden areas between the curtilage of the main dwelling and the annex.
- Have adequate parking and amenity facilities for the needs of the annex occupants and the residents of the main dwelling.
- Comply with the Council's normal standards for extensions to a dwelling including those relating to design and the amenities of neighbouring occupiers.

It is a matter of fact and degree as to whether or not the proposed self-contained annex would be an annex or an independent dwelling.

The proposed granny annex would be within the same curtilage as the main dwelling and access to it could be achieved from Jubilee Crescent through the vehicular accessway to the property, or from the rear accessway as shown by the gates on the plans. It therefore has the potential to be accessed independently of the dwelling.

The proposed granny annex would be situated in the existing rear garden of the application property, within the converted garage and or/outbuildings. There is no separate parking shown on these current plans, and no sub-division of the garden area or any physical boundaries such as boundary walls. However, the proposed one bedroom granny annex would, as shown on the drawings, have its own front door in the flank elevation, so occupiers of the annex would not have to enter the host dwelling to be able to access it. The proposed plans show that the annex would provide an open plan kitchen/living room area, a bathroom (incorrectly annotated as bedroom) and a double bedroom, providing everything needed for independent occupation.

Given the above assessment, along with the aforementioned pre-application enquiry context, the proposed plan identifying the annexe as a house (drawing No. A.04), and in weighing up all the issues, it is considered that the proposed conversion of the garage into an annexe- which is being applied for- would not be ancillary to the host dwelling and would create a self-contained unit of accommodation which would not be functionally connected to the residential use of the main planning unit. This would be harmful to the character of the area and amenity contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (LPCS) (2014).

Having established that the proposal would be for a self-contained unit of accommodation, reference back to the advice given during the pre-application stages must be made, the contents of which remains relevant to this proposal, and is therefore included within the assessment below.

The principle considerations in the assessment of this application would be as follows:

- Housing Need
- Principle of Development
- Design, Character and Appearance
- Amenity of Future Occupiers
- Neighbouring Amenity
- Highways & Parking
- Ecology & Biodiversity
- Land Contamination
- Archaeology
- Fire Safety
- Refuse

Housing Need

In *Hopkins Homes Ltd v Secretary of State for Communities and Local Government* [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that that planning applications should be determined in accordance with the development plan. Paragraph 12 of the National Planning Policy Framework (NPPF) (2024) 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 policymaking role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than "guidance" and as such a "material consideration" for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme."

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in February 2025, it demonstrates that based on data up for the period 2024-2029, the Council can only demonstrate a land supply of 3 years.

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

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

a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

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

- Habitats sites (and those sites listed in NPPF paragraph 194)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- A National Landscape
- Irreplaceable habitats
- Designated heritage assets (& 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 129) 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 '1' residential unit would offer a minimal contribution towards meeting this local need and, accordingly, officers considers that 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 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 acceptable amenity for future occupiers.

Principle of Development

Policy CS02 (LPCS) states that development shall be prioritised in the urban area as a sustainable location for development. It states this will be achieved by amongst other things, promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area and bringing forward a range of suitable sites in other parts of the urban areas for residential. The proposal for a dwelling on this site in the urban area is therefore acceptable in terms of principle. However, it will need to be assessed to see if it is acceptable in regard to all other considerations.

Design, Character and Appearance

Policy CS14 (LPCS) states that new housing development will be expected to provide a range of dwelling types and sizes taking into account the existing character of the area and to create sustainable and balanced communities. Policy CS15 (LPCS) states that sites will be developed at a variety of densities depending on the site's location and accessibility to public transport. Furthermore, development needs to be delivered at a density that achieves good design and does not compromise the character of the area. Policy CS19 (LPCS) states that the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. The NPPF (2024) sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve and add to the overall quality of the area, not just for the short term but over the lifetime of the development.

The application site comprises no. 32 Jubilee Crescent, which it is proposed to contain the existing main dwelling and the self-contained single storey unit of accommodation (which shall forthwith be referred to as a dwelling) in the rear garden. To the west is the rest of the terrace that the dwelling is situated within, to

the south there are semi-detached and terraced dwellings, to the east is a terrace of dwellings and to the north there are terraced dwellings in Hampton Crescent.

The proposed dwelling would be located right up against the northern and eastern boundaries of the site. The front of the dwelling would face westwards with the dwelling likely to be accessed from the vehicular accessway to the rear which serves the garages at the rear of the dwellings in Jubilee Crescent and Hampton Crescent. The dwelling would be 8.1m in width, 5.8m – 6.7m in depth and be constructed with a flat roof; 2.5m in height. In the west elevation (described as left side elevation on the plans) there would be the front door and window, in the south side elevation there would be bi-fold doors and a window (described on the plans as front elevation) and in the north and eastern elevations there would be no openings.

The siting, layout and orientation of the proposed dwelling is completely out of keeping with the surrounding pattern of development.

In respect of siting there are no other dwellings in the rear gardens of this part of Jubilee Crescent or Hampton Crescent. The proposal for a single detached dwelling in the back garden of no. 32 Jubilee Crescent would be an incongruous form of development which would be completely out of keeping with the pattern of development in the area of terraced and semi-detached dwellings which front Jubilee Crescent and Hampton Crescent.

The dwelling would have no active frontage onto the streetscene but would face onto the rear vehicular accessway serving the garages at the rear of the properties in Jubilee Crescent and Hampton Crescent. It would also have two of the four elevations built right up against the boundaries of the site. This would be completely at odds with the character of the area where all of the dwellings in Jubilee Crescent and Hampton Crescent have an active frontage onto Jubilee Crescent or Hampton Crescent. The single storey nature of the proposed dwelling compared to the surrounding dwellings which are all two storeys also adds to the discordant nature of the proposed development.

The proposed development would be visually disruptive to the established and recognisable pattern of the surrounding pattern of development. It would fail to address the public highway and would be of an incongruous addition in the back garden of the property. The form of the proposals would starkly contrast with the established pattern of the surrounding built environment.

The dwelling being sited in the back garden facing onto the rear vehicular accessway, built right up against two of the boundaries results in it being out of keeping and an anomaly with the pattern of development in the area and would be a particularly incongruous form of development. This together with the lack of a suitably sized garden area to the rear elevation of the dwelling means it would appear cramped, contrived and visually discordant. The proposal appears as if it would be an overdevelopment squeezed into an inappropriate site. The proposed dwelling would therefore have a significant impact on the character and appearance of the surrounding area.

There are severe concerns in terms of the proposal in relation to design, character and appearance. The proposed dwelling by virtue of its siting, orientation and design would be an incongruous form of development which would appear cramped, an overdevelopment of the site and would be out of keeping with the pattern of development in the area. It would be harmful to the character and appearance of the area and as such the proposal would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (LPCS) (2014) and Section 12 of the National Planning Policy Framework (NPPF) (2024).

Amenity of Future Occupiers

Careful consideration has to be made to the proposed scheme to ensure future occupiers would have satisfactory living conditions and amenity in terms of size of the dwelling, layout, outlook, no overshadowing or overlooking, sufficient amenity space and no material harm caused by noise etc. in order to be compliant with Policy CS19 (LPCS) (2014).

The proposal needs to meet national and local internal space and external private amenity space

standards.

Internal area

The proposed dwelling is a 1 bedroom, 2 person, 1 storey dwelling and the internal space standard is 42.4 sqm. The Technical Housing Standard (2015) states that for this type of dwelling the minimum internal floor area is 50 sqm. There is an issue with the plans that prevent the room areas from being electronically measured, however, based on the dimensions provided, the proposed dwelling does not meet the minimum standard.

It is also evident that sufficient privacy distances cannot be obtained between the proposed dwelling and the rear elevation of the host property, and immediately adjacent properties, contrary to the Residential Layout guidelines.

Garden area and depth

The proposed dwelling would not have a garden area to the rear as the rear elevation would be built right up to the eastern boundary of the site. There is no garden area shown on the plans.

The Residential Layout Guidelines (2020) sets out that the minimum garden area for a one bedroom dwelling is 37.2 sq. m and the minimum rear garden depth is 7.6m. Furthermore, the area to the south of the dwelling would be right next to the remaining garden area for the host dwelling. Given their close proximity and orientation with one right behind the other it is considered that privacy for future occupiers (and occupiers of the host dwelling) would not be high and it would not be quality amenity space for future occupiers.

Bedrooms

The Technical Housing Standard (2015) states that the minimum size for a double bedroom is 11.5 sq. m, the proposed bedroom is 12.06 sq. m and would therefore meet the minimum standard.

Light and outlook

The window in the front of the dwelling serving the bedroom would have a very poor outlook as it would look out onto the vehicular accessway serving the rear of the dwellings in Jubilee Crescent and Hampton Crescent. The window and bi-fold doors in the south flank elevation serving the living room and kitchen would look out onto 32 Jubilee Crescent. There are no windows proposed in the remaining elevations of the dwelling, although a rooflight is proposed to serve the bathroom. Overall, the outlook for future occupiers would be poor.

Disturbance & approach to/from dwelling

It is considered that future occupiers would experience very poor levels of amenity with regards the dwelling facing onto the rear vehicular accessway which serves a number of properties in Jubilee Crescent and Hampton Crescent. Comings and goings from vehicles using the accessway could lead to disturbance to future occupiers of the dwelling. Furthermore, it is generally not considered a nice environment for a residential dwelling in this location with no frontage onto a street frontage i.e. Jubilee Crescent. Occupiers wishing to walk to/from the property would likely have to walk all the way along the rear vehicular accessway with no pavement etc. The location and access to/from the dwelling is considered completely unsuitable for future occupiers.

There are fundamental concerns regarding the amenity, privacy and living conditions of future occupiers of the proposed development. Overall, due to the internal floor area of the proposed dwelling being significantly undersized, no private rear garden, poor outlook, disturbance and location with the dwelling only accessed from the rear vehicular accessway, the proposal would be detrimental to the amenity and privacy of future occupiers of the dwelling. As such, the proposal is contrary to Policy CS19 (LPCS) and

paragraph 135(f) of the NPPF (2024) which expects new development to secure a good standard of amenity for existing and future occupants of land and buildings.

Neighbouring Amenity

Proposals for new development need to ensure that there would be no undue harm to the amenity and living conditions of neighbouring properties with regards overshadowing, loss of light, loss of outlook, overlooking etc. in order to comply with Policy CS19 (LPCS) (2014). SPG2: Residential Layout Guidelines (2020) sets out the standards that need to be achieved in order that a development would not impact on the amenity or privacy of any neighbouring properties and what should be adhered to with regards privacy distances and overshadowing.

The proposed dwelling is single storey and would be situated against the rear gardens of a number of dwellings. The dwelling would be built on the site of the existing outbuilding(s) in the rear garden. It would be single storey and constructed with a flat roof which reduces bulk. Notwithstanding this, the converted building would be used as a dwelling, which would be very close to the boundaries of the site and through its use could still have an overbearing impact on the neighbouring dwellings and generally be an unneighbourly form of development. Having a dwelling at the end of the garden surrounded by the gardens of other neighbouring properties is considered to result in the proposed development causing a disturbance- as the rear gardens are a place where neighbours could reasonably expect to not find self-contained dwellings.

The bedroom window would face out onto the vehicular accessway so there would be no overlooking here. However, the living/kitchen window and door would face towards no. 32 Jubilee Crescent and satisfactory privacy distances cannot be obtained. In addition, the plans do not show how the garden area of the host dwelling would be protected and there appears to be insufficient space to accommodate the garden area and depth required for both dwellings.

It is considered that given its siting, size and proximity to neighbouring dwellings, the proposal would detrimentally impact the amenity of neighbouring properties due to disturbance, being overbearing and an unneighbourly form of development. In addition, the proposal would also appear to result in an undersized garden area and depth for the host dwelling. As such, the proposal would be harmful to the amenity of neighbouring properties and would therefore be contrary to Policy CS19 (LPCS) (2014).

Parking and Highways

Policy CS11 (LPCS) (2014) states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. It also states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities.

KCC Parking Standards SPG4 (2006) states that for a one bedroom dwelling there should be a maximum of 1 space. The proposed development shows no off-street parking provision at all. As such, the proposal is considered to be contrary to Policy CS11 (LPCS) and saved Policy P3 of the Gravesham Local Plan First Review(LPFR) (1994).

Ecology and Biodiversity

Biodiversity Net Gain

The addition of one dwelling would be subject to Biodiversity Net Gain. The biodiversity net gain metric has not been provided for this application. As set out in the procedural matters section of this report, additional and revised information has not been sought as the Local Planning Authority are not looking to support this proposal.

Paragraph 187 of the NPPF (2024) relates to habitats and biodiversity and sets out the principles that local planning authorities should apply when determining planning applications.

At a local level Policy CS12 (LPCS) states the following:

There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, recreate and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

In light of the requirements of the NPPF (2024) and Policy CS12 (LPCS), any planning application should be accompanied by a biodiversity report which demonstrates that the requirements of the NPPF (2024) and Policy CS12 (LPCS) would be satisfied in addition to the requirements for Biodiversity Net Gain. This has not been met and as such the application fails to accord with Policy CS12 (LPCS) (2014) and Section 15 of the NPPF (2024).

Strategic Access Management and Monitoring Strategy

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering waterbirds and migrating birds. There has been a decline in the number of birds using these sites in recent

years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km

of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is

because new housing development is likely to lead to further increases in recreational use of the sites which means that further declines in the bird population cannot be ruled out. Possible mitigation measures

are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £337.49 for each new dwelling within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds. The applicants have not paid towards the mitigation.

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

Land contamination

Policy CS19 (LPCS) sets out that new development shall be located, designed and constructed to avoid adverse environmental impacts from amongst other things, land contamination. The site is in the Historic Landfill Buffer Zone for The Nest Landfill site. As the site falls within the curtilage of a historic landfill site, if any ground breaking work is to take place, a watching brief condition would be recommended in case any contamination issue is encountered. The statement accompanying this application states that the annexe is already in use. Therefore, if planning permission were to be forthcoming for the development, clarification on whether any ground works are required could be sought, and a watching brief could be added to the decision notice, as appropriate.

Archaeology

The site is in an Area of Archaeological Potential. As above, if planning permission were to be forthcoming

for the development, clarification on whether any ground works are required could be sought.

Fire Safety

The proposal has not shown that the development has sufficient access with regards to Kent Fire & Rescue. If planning permission were to be forthcoming, this could be secured by condition, as necessary.

Refuse

Policy CS19 (LPCS) requires new development to incorporate appropriate facilities for the storage and recycling of waste. Paragraph 8 of the NPPF (2024) states that waste and pollution should be minimised. Details of the location and appearance of the refuse storage facilities for the proposed dwelling could potentially be secured by condition, if planning permission were to be forthcoming.

Conclusion

The application has been fully considered and is contrary to local and national planning policy.

The proposed dwelling by virtue of its siting, orientation and design would be an incongruous form of development which would appear cramped, an overdevelopment of the site and would be out of keeping with the pattern of development in the area. It would be harmful to the character and appearance of the area and as such the proposal would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (LPCS) (2014) and Section 12 of the National Planning Policy Framework (NPPF) (2024).

There are fundamental concerns regarding the amenity, privacy and living conditions of future occupiers of the proposed development. Overall, due to the internal floor area of the proposed dwelling being significantly undersized, no private rear garden, poor outlook, disturbance and location with the dwelling likely to be accessed from the rear vehicular accessway, the proposal would be detrimental to the amenity and privacy of future occupiers of the dwelling. As such, the proposal is contrary to Policy CS19 (LPCS) and paragraph 135(f) of the NPPF (2024) which expects new development to secure a good standard of amenity for existing and future occupants of land and buildings.

It is considered that given its siting, size and proximity to neighbouring dwellings, the proposal would detrimentally impact the amenity of neighbouring properties due to disturbance, being overbearing and an unneighbourly form of development. In addition, the proposal would also appear to result in an undersized garden area and depth for the host dwelling. As such, the proposal would be harmful to the amenity of neighbouring properties and would therefore be contrary to Policy CS19 (LPCS) (2014).

The proposed development shows no off-street parking provision at all. As such, the proposal is considered to be contrary to Policy CS11 (LPCS) and saved Policy P3 of the Gravesham Local Plan First Review(LPFR) (1994).

In light of the requirements of the NPPF (2024) and Policy CS12 (LPCS), any planning application should be accompanied by a biodiversity report which demonstrates that the requirements of the NPPF (2024) and Policy CS12 (LPCS) would be satisfied in addition to the requirements for Biodiversity Net Gain. This has not been met and as such the application fails to accord with Policy CS12 (LPCS) (2014) and Section 15 of the NPPF (2024).

The applicant has failed to provide any ecological evidence to inform a habitat regulations assessment to address the impact of the proposed development on the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) or offered a financial contribution towards the identified mitigation measures to address the impact of the development on the SPA/Ramsar site. The proposal is therefore contrary to Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy (2014) which seeks to ensure that detrimental effects on the integrity of SPA/Ramsar sites are avoided, and also contrary to Paragraphs 192 and 193 of the NPPF (2024), and the requirements of the Conservation of Habitats and Species Regulations 2017.

Recommendation

Refusal

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

Case Officer:	Mrs Lucy Hankin	Team Leader:	Richard Hart
Signed:	L Hankin	Signed:	<i>R Hart</i>
Dated:	16th December 2025	Dated:	17th December 2025