

Planning Statement

**46A Springhead Road, Northfleet,
Gravesend, Kent, DA11 9QY**

Retrospective application for the formation of vehicular access onto B262 and provision of one off-street parking space in front garden with associated works



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Project reference: PR4779

01 September 2026

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1 Introduction

- 1.1 This Planning Statement has been submitted in support of an application for the following development at 46A Springhead Road, Northfleet, Gravesend, Kent, DA11 9QY (hereafter referred to as 'the Site'):

Retrospective application for the formation of vehicular access onto B262 and provision of one off-street parking space in front garden with associated works

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

Title Number	Description	Owner
K316503	<u>46A SPRINGHEAD ROAD, NORTHFLEET, GRAVESEND DA11 9QY</u>	The Applicant

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

- 4779.ON – Planning Statement
- 4779 – 01 Site Location Plan
- 4779 – 02 Existing Block Plan
- 4779 – Existing Plan, Elevations and Sections.

2 Site Context

- 2.1 The Site, which is situated on the west side of Springhead Road, is characterised by a semi-detached dwelling and occupies a total of 155 m².
- 2.2 The principal elevation of the dwelling comprises pebble dash, with a ground floor bay window. The windows are white UPVC, the roof is clay tile, and the guttering and downpipes are white plastic.
- 2.3 Internally, the dwelling is split across two floors. The ground floor comprises a lounge, dining room, kitchen/breakfast room and a bathroom. On the first floor, there are three bedrooms. In total, the house has a GIA of 84m².
- 2.4 The rear garden extends some 20 m from the rear wall of the dwelling (at its furthest point). Meanwhile, the front garden is made up of entirely hardstanding, and is the subject of this application.
- 2.5 In a wider context, the Site forms part of Springhead Road, which comprises of a mix of dwellings (semi-detached and detached), as well as a primary school and a car garage.
- 2.6 This Site is the subject of the following planning constraints and characteristics:
 - Flood Zone 1

3 Relevant History

3.1 It is understood that the Site has no relevant planning history.

4 Proposed Development

4.1 The application entails the following elements:

- Retrospective application for the retention of existing hardstanding for parking.
- Proposed access from the B262.
- Driveway is 5 m wide and 4.9 m at its longest points
- Change from non-permeable concrete to permeable block paving
- Includes 5 m long drain adjacent to the highway.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker, this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 3 of section 1 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6).
- 5.3 Policy S3 of the Framework states that development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
- 5.4 Policy DM3 of the Framework requires local planning authorities (LPAs) to work with applicants in a positive and proactive manner, seeking solutions to problems arising from initial proposals. LPAs should also take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact. LPAs must only consult statutory or internal consultees only where it is necessary to do so and must not delay issuing a decision in order to secure advice from a statutory or internal consultee beyond their statutory deadlines unless insufficient information exists, there are public safety risks from proceeding without advice, or more detailed advice may enable an approval rather than a refusal.
- 5.5 Annex A of the Framework confirms that for the purposes of decision-taking, development plan policies should not be given reduced weight simply because they were adopted prior to the publication of the Framework. It adds that development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight.

Development Plan

5.6 It is understood that the Development Plan for Gravesham Borough Council (GBC), within which the Site is located, comprises the following documents:

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

5.7 In the CS, the following policies are considered most relevant in the determination of this application:

- CS01 – Sustainable development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS19 – Residential Layout Guidelines

5.8 In the LPFR, the following policies are considered most relevant in the determination of this application:

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

Other Material Considerations

The Framework

5.9 In summary, the following policies are considered most relevant as additional material considerations in connection with the proposed development:

- S1 – Three overarching objectives for sustainable development.
- TR6 – Unacceptable impact on highway safety.
- L1 – Making effective use of land.

Further Material Considerations

- Residential Layout Guidelines (June 2020)
- KCC Vehicle Parking Standards (January 2025)
- Householder Extensions/Alterations Design Guide SPD (October 2021)
- Manual for Streets 1 (MfS1) (March 2007)
- Manual for Streets 2 (MfS2) (September 2010)

6 Planning Assessment

Key Issues

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

1. Highway safety
2. Design, character and appearance
3. Parking provision

1. Highway safety

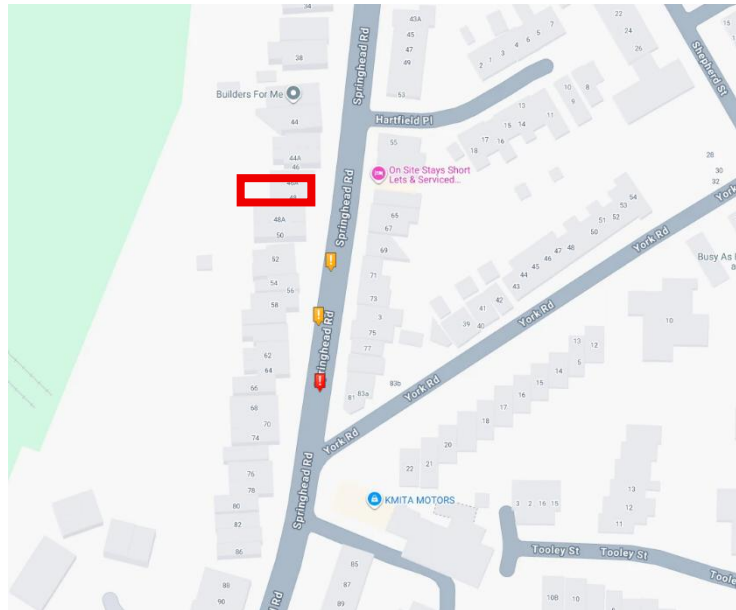
6.2 The Site is situated along a B-classified road, which means the subject application must abide by GBC's policies surrounding parking, as well as householder alterations.

6.3 As set out above, policy TR6 of the Framework makes clear that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety.

6.4 The accident data for Springhead Road over the preceding five-year period is reproduced below. Three recorded collisions have occurred within approximately 100 m of the Site during this period; however, there is no evidence to indicate that any were associated with vehicles entering or leaving private residential accesses.

6.5 The northernmost collision occurred on 12 February 2024 and involved four vehicles, resulting in one minor casualty. The second collision occurred on 11 August 2022 and involved two vehicles, resulting in one minor casualty. The third occurred on 22 September 2022, involving a single vehicle and resulting in one serious casualty.

6.6 Whilst the absence of access-related collisions does not, in itself, demonstrate that the proposal is without highway risk, the available accident record provides no evidence of an existing highway-safety issue arising from the numerous private residential accesses along this section of Springhead Road.



Visibility

- 6.7 In respect of visibility, the relevant requirement for an individual residential access is the provision of 2 m × 2 m pedestrian visibility splays. It is acknowledged that conventional splays of these dimensions cannot be provided wholly within the Applicant's control.
- 6.8 Nevertheless, non-compliance with the dimensional standard does not, in isolation, establish that the access would result in an unacceptable impact on highway safety. The practical operation of the access and the characteristics of the surrounding highway must also be considered.
- 6.9 Of the 48 properties lining the western side of Springhead Road, 20 (approximately 42%) benefit from some form of private vehicular access. Residential accesses are therefore an established and frequent characteristic of this section of the highway, including examples where visibility appears similarly constrained.
- 6.10 Furthermore, the depth of the intervening footway, together with the elevated position of the driveway, provides a degree of intervisibility between vehicles and pedestrians approaching the access. Although this does not constitute a conventional 2 m × 2 m visibility splay wholly within the Applicant's control, it assists drivers in identifying approaching pedestrians before entering the carriageway.

Parking Provision

- 6.11 KCC's adopted parking standards generally require a perpendicular parking space to measure 4.8 m × 2.5 m. It is acknowledged that the driveway, at approximately 4.3 m in depth, falls below the prescribed length.
- 6.12 However, the established use of the driveway provides an opportunity to assess its practical operation. As demonstrated by the photograph below, a vehicle can be accommodated within



- 6.13 The shortfall against the standard should therefore be considered in the context of the actual arrangement rather than solely by reference to the prescribed dimensions. In this instance, the evidence demonstrates that off-street parking can take place without the parked vehicle preventing pedestrian movement along the footway.
- 6.14 This should also be considered against the wider character of Springhead Road, where approximately 42% of properties on the western side provide off-street parking and a range of access and parking arrangements already exist. The proposal would therefore not introduce an unfamiliar form of parking or access into the street.
- 6.15 Moreover, the Applicant possesses another smaller vehicle, which adequately fits within the parking space.

Operation of Springhead Road

- 6.16 Manual for Streets identifies that frontage access can operate on streets accommodating significant levels of traffic and does not establish that frontage access should automatically be precluded by traffic volume alone. The relevant consideration remains the particular characteristics and safe operation of the highway.
- 6.17 Springhead Road is subject to a 30 mph speed limit and accommodates substantial on-street parking on both sides of the carriageway. This reduces the effective carriageway width at various points and requires approaching vehicles to moderate their speed and, on occasion, give way to opposing traffic.
- 6.18 Against this established context, the retention of a single residential access would represent a limited intervention within a street already characterised by frequent residential accesses, off-street parking and regular vehicle movements to and from individual properties.

Gradient

- 6.19 It is additionally acknowledged that the gradient of the driveway exceeds that ordinarily sought by KCC for a private residential access. As with the matters of visibility and parking dimensions above, however, departure from the recommended standard should be distinguished from evidence of an unacceptable highway-safety impact.
- 6.20 The driveway is already constructed and operational and can therefore be assessed having regard to its actual use. Vehicles are capable of entering, parking within and leaving the Site notwithstanding the gradient, and there is no evidence that its operation has resulted in vehicles grounding, losing traction or otherwise creating a hazard within the adjoining highway.
- 6.21 Importantly, the driveway is formed with a bound surface and appropriate consideration has been given to the management of surface water, thereby reducing the potential for loose material or uncontrolled runoff to be carried onto the adjoining footway and carriageway. The gradient should therefore be considered in conjunction with the physical construction and actual operation of the access rather than as a numerical departure in isolation.
- 6.22 Overall, it is acknowledged that the retained access does not achieve all of KCC's preferred dimensional standards in respect of pedestrian visibility, parking depth and gradient. The Applicant does not seek to dispute these departures. Rather,

the relevant question is whether, having regard to the particular circumstances of the Site and the established operation of Springhead Road, those departures translate into an unacceptable impact on highway safety.

- 6.23 The access serves a single dwelling; private accesses are an established characteristic of Springhead Road; the available collision data does not identify an existing pattern of accidents associated with residential accesses; a vehicle can be accommodated without materially obstructing the footway; and the access is demonstrably capable of accommodating vehicle movements despite its gradient.
- 6.24 When considered collectively, the identified departures from the dimensional standards are not considered sufficient to demonstrate that the development results in an unacceptable impact on highway safety. Accordingly, the retention of the access is considered to accord with the highway-safety test established by policy TR6 of the Framework and should not be refused on highway grounds.

2. Design, character and appearance

- 6.25 As it exists, there is no soft landscaping at the Site. However, as part of the proposal, the Applicant welcomes the conditioning of additional landscaping to soften the appearance of the hardstanding.
- 6.26 This will further enhance the appearance of the Site as well as contributing to the drainage on the Site, ensuring that there is no excessive water runoff onto Old Road West.
- 6.27 As set out above, paragraph 10.21 of the Householder Extensions/Alterations Design Guide SPD sets out the criteria for the laying of hard surface to the front garden of houses which are as follows:
- Hardstanding should be proportionate to the size of the dwelling and the relevant car parking standards and avoid paving over a significant amount of the forecourt. Soft landscaped planted border along all boundaries should be provided in all spaces not specifically defined as parking or turning spaces. – *As above, the Applicant is willing to introduce more soft landscaping at the Site to reduce the harsh appearance.*
 - Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property. 1 metre should be the minimum space between or around car parking spaces – *The proposed parking space will not impact the access to the front door or side gate, so this is not relevant.*

- Front garden parking must be designed to avoid cars overhanging the pavement. Car parking spaces a minimum of 2.5m wide (2.7m where spaces adjoin an enclosed boundary) and 5m deep should be provided. – *This has been discussed above.*
- Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked. – *There are no proposed gates therefore it does not clash with this policy.*
- Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway. – *There is no proposed gate, so this is not relevant.*
- Avoid removing any existing trees or established hedges and introduce new planting wherever possible. – *There was no pre-existing soft vegetation at the Site, so this is not relevant.*
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of Permitted Development. – *The Site utilises a drain adjacent to the boundary that accounts for potential runoff at the Site*
- There should be no water run-off from the forecourt onto the public highway. – *This again will be resolved by the drainage system at the Site*
- Where loose surfacing is proposed, a minimum of 1m depth of non-loose hardstanding should be provided at the front edge of the driveway with the public highway – *There will be 1m of non-loose hardstanding between the driveway and the public highway.*
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling. – *There are no decorative tiles or paths at the Site*
- Pedestrian and vehicle visibility splays should be provided. – *This has been assessed above.*

6.28 Therefore, the Applicant contests that the Site adheres to the residential extension guidance, as well as local and national policy relating to design.

3. Parking provision

6.29 The Gravesham SPG4 states that the maximum number of parking spaces for a 3-bedroom dwelling is 2. The development provides one parking space, whilst the dwelling has three bedrooms, which adheres to the maximum set out by KCC.

7 Conclusions

- 7.1 In respect of highway safety, whilst it is acknowledged that the access departs from KCC's recommended standards in relation to pedestrian visibility, parking depth and gradient, these departures do not, in themselves, demonstrate an unacceptable impact on highway safety. Having regard to the established character and operation of Springhead Road, the prevalence of existing private accesses, the available accident data and the demonstrated operation of the driveway, the development is not considered to give rise to an unacceptable highway safety impact. Accordingly, the proposal satisfies the relevant test established by policy TR6 of the Framework.
- 7.2 In design terms, the hardstanding is considered proportionate to the residential use of the Site and would not adversely affect the character or appearance of the dwelling or surrounding street scene. Whilst the frontage is presently dominated by hard surfacing, the Applicant welcomes a suitably worded condition requiring additional soft landscaping to soften its appearance and provide an appropriate balance between parking and planting. Together with the existing drainage arrangements, absence of gates, retention of pedestrian access and provision of a non-loose surface adjacent to the highway, the proposal is considered to broadly accord with the objectives of the Householder Extensions/Alterations Design Guide SPD and relevant local and national design policy.
- 7.3 With regard to parking provision, the development provides one off-street parking space to serve the existing three-bedroom dwelling. This does not exceed the maximum provision of two spaces identified for a three-bedroom dwelling within Gravesham SPG4 and represents an improvement over the previous absence of off-street parking at the Site. Notwithstanding the identified dimensional shortfall, the evidence demonstrates that the frontage is capable of accommodating a vehicle without materially obstructing pedestrian movement along the adjoining footway. The development is therefore considered to provide an appropriate level of off-street parking having regard to the particular circumstances of the Site.
- 7.4 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority and it is respectfully requested that this submission is approved.