



Delegated Report

Householder Planning Application

Planning Application No: 20240820

Location: 241 Wrotham Road Gravesend Kent DA11 7LL

Description: Erection of dormer extension in rear roof slope; hip to gable roof enlargement; 2 no. roof lights in front roof slope; conversion of roof space into habitable rooms; and formation of vehicle access and parking area in front garden.

Applicant: Jessica Robinson

Site Visit Date: 07 November 2024

Submitted Documents/Plans

Householder Application for Planning Permission form;
Drawing no. JMD-1207-B-010 Rev. P2 Site location plan;
Drawing no. JMD-1207-B-020 Rev. P1 Existing block plan;
Drawing no. JMD-1207-B-030 Rev. P1 Proposed block plan;
Drawing no. JMD-1207-B-100 Rev. P2 Existing elevations and sections;
Drawing no. JMD-1207-B-110 Rev. P2 Proposed elevations and sections;
Drawing no. JMD-1207-B-120 Rev. P2 Existing first floor layout and roof plans;
Drawing no. JMD-1207-B-130 Rev. P2 Proposed first floor layout and roof plans;
Drawing no. JMD-1207-B-140 Rev. P1 Existing and proposed site sections;
Drawing no. JMD-1207-B-150 Rev. P1 Existing and proposed parking plans;
Drawing no. JMD-1207-B-160 Rev. P1 Existing and proposed street views and front boundary treatments;
Supporting Statement May 2024;
Representation from the applicant received 13 October 2024; and
Email from the applicant received 07 November 2024.

Procedural Issues

Following a query from the case officer, the applicant clarified her name and confirmed that she had submitted comments via the GBC website to support her proposal.

Relevant Planning History

Reference	Description	Decision	Decision Date
20200346	Removal of front wall, creation of a dropped kerb, vehicular access and paved parking area to front of property	Refused	01.07.2020

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 9 – Promoting Sustainable Transport
- Section 12 – Achieving Well-Designed and Beautiful 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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)

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

GBC Environmental Protection Team (Regulatory Services)

There is no objection to this application or adverse comments to make.

KCC - Highways & Transportation

I refer to the above planning application and confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:-

- The height of the front wall shall be a maximum of 0.6m in height across the whole of the frontage in order that adequate pedestrian visibility is available. On the grounds of highway safety.
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans

(drawing no JMD-1207-B-150 Rev P1) prior to the use of the site commencing.

Please advise the applicant that they will require separate consent from KCC Highways for the construction of the dropped kerb and footway crossing.

Planning permission does not convey any approval for construction of the required vehicular crossing, or any other works within the highway for which a statutory licence must be obtained. Applicants should contact Kent County Council - Highways and Transportation (web: www.kent.gov.uk/roads_and_transport.aspx or telephone: 03000 418181) in order to obtain the necessary Application Pack.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Neighbouring properties

The application was publicised by a site notice and to five neighbouring properties by letter. Three representations (two in support and one objecting) have been received and are summarised as follows;

Comments in support:

- The proposal would take vehicles off the road.
- The proposed parking is similar to an existing off street parking arrangement nearby.
- The proposal would allow safe and convenient charging of the applicant's work vehicle.
- Current on street parking adversely impacts upon persons attending St Mary's Church and St George's School and on parking for emergency vehicles.
- The proposal would reduce the potential for criminal damage to the applicant's parked vehicles.
- Supports the proposed loft extension provided a party wall agreement is put in place.

Comments objecting:

- The loss of on-street parking would exacerbate existing parking difficulties for residents and non-residents in the area.
- If approved, measures to improve parking in the area should be considered, such as parking permits and one way traffic in Hillingdon Road from Singlewell Road.

Officer's Analysis

Background

Planning permission was refused in July 2020 for the removal of the front wall and the creation of a dropped kerb, vehicular access and paved parking area at the front of the application property (reference 20200346). The reasons for refusal were as follows;

1. *The proposed vehicular access and hardstanding would have a detrimental impact on highway safety. There would be insufficient width available within the parking area to enable vehicles to turn within the curtilage of the site, which would lead to vehicles dangerously reversing from the site, between parked vehicles into traffic. The proposal would therefore be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy T5 of the Gravesham Local Plan First Review November 1994 and Planning Guidance Note 6.*
2. *The proposed development would detract from the character and appearance of the street scene in Wrotham Road, by virtue of the loss of part of an existing boundary treatment and vegetated frontage. This part of Wrotham Road is characterised by low front walls and enclosed and vegetated front gardens, which softens the frontages of the dwellings and is a positive feature of the street scene. Therefore the proposed development would have a detrimental impact on visual amenity and as such, it would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.*

The current application has an amended frontage parking arrangement and also includes a loft conversion with a hip to gable roof enlargement and a rear dormer.

Design, Character and Appearance

Paragraph 135 of the National Planning Policy Framework 2023 (NPPF 2023) sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph

139 of the NPPF 2023 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

In relation to rear roof extensions, the Householder Extensions/Alterations Design Guide (2021) sets out that proposals should be set away from the gables, hips, eaves and ridge of a property; be lower than the existing ridge line and retain the original ridge line treatment; that dormers should not overwhelm the roof slope within which they are placed; and that windows should reflect the position, design and character of existing windows on the host building.

In relation to side roof extensions the Householder Extensions/Alterations Design Guide (2021) sets out that proposals would be lower than the existing ridge line, should not wrap around two sides of a hipped roof unless justified, that windows should reflect the position, design and character of existing windows on the host building and for hip to gable alterations, they should not interrupt or unbalance the pattern of roof form visible from the street.

In relation to frontage parking, relevant considerations in the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023 are that;

- Hardstanding should be proportionate to the size of the dwelling and the relevant car parking standards and avoid paving over a significant amount of the forecourt.
- Soft landscaped planted border along all boundaries should be provided in all spaces not specifically defined as parking or turning spaces.
- Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property.
- Must be designed to avoid cars overhanging the pavement.
- Avoid removing any existing trees or established hedges and introduce new planting wherever possible.
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues.
- There should be no water run-off from the forecourt onto the public highway.
- Pedestrian and vehicle visibility splays should be provided.

The proposed dormer and hip to gable enlargement would add a significant bulk to the rear/side of the application property, would unbalance the semi-detached building of which it is a part and would be widely visible in the street scene. Furthermore, the proposed window arrangement in the dormer would not match with existing windows at the application property. However, the dormer would be subservient in size to the resulting roof slope and the bulk of the hip to gable enlargement would be reduced using a barn hipped roof design. It is noted that the proposal would meet the cubic content criteria for permitted development under Class B of Part 1, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Furthermore, the proposed facing materials would match with the existing roof. As such, it is considered that despite the non-conformity of the proposed windows, the unbalancing impact and the size/bulk issues, the design approach would not be significantly detrimental to the character of the existing building.

The application site comprises of a semi-detached dwelling with a relatively large front garden that is laid mainly to grass but with some vegetation. It has a narrow concrete pathway. The existing front boundary treatment is a red brick wall of some 0.75 metres in height. The surrounding dwellings have a similar front garden arrangement, with most having a low wall, a grassed/planted frontage and a narrow pathway. The adjacent church has a hedge along the front boundary, which encloses the frontage. As such, there is some uniformity to the street scene, whereby the front gardens are enclosed and often vegetated in nature.

As the following image illustrates, this is a positive feature of the street scene, which contributes to visual amenity on this important thoroughfare into the town centre.



Google Street View November 2022

The proposed development would result in the loss of most the vegetated and enclosed nature of the front garden at the application site and its replacement with an expanse of hardstanding and parked vehicles. Although it is noted that a partial front boundary wall would be retained (with elements on both sides of the proposed access), grassed areas would be retained on both sides of the proposed parking area (in strips) and existing vegetated land at the rear of the proposed parking area would be retained. In addition, it is proposed to erect a new retaining wall at the rear of the parking area, with new landscaping behind.

However, despite the positive design features of the proposal, the proposed opening on the site frontage would be excessive in width, undermining the existing sense of enclosure. Furthermore, the proposed grassed strips would be very narrow and token in nature, the proposed landscaping at the rear, due to the lower ground level, would not be widely visible in the street scene and the introduction of parked vehicles on the site frontage, would undermine the existing open and verdant nature of the front garden.

The Borough Council has maintained a consistent approach in terms of design to proposed accesses in Wrotham Road for many years. For example, planning permission was refused and dismissed on appeal for application reference 20190376 (for the formation of a hardstanding in the front garden and creation of a vehicle crossover at no. 170 Wrotham Road) on 09 July 2019 on grounds of adverse impact on the character and appearance of the surrounding area (as well as on highway safety grounds). A subsequent appeal (reference APP/K2230/D/19/3236225 contained in Appendix 1) was dismissed on 02 March 2020. In respect of the impact on character and appearance the Inspector commented;

10. The front garden of the appeal site is currently laid to lawn with a pathway leading to the front door. The garden is enclosed by a low-level brick wall and an area of landscaping occupies the north-western corner of the garden, adjacent to the pavement. The neighbouring front gardens within the terrace exhibit variety in terms of their boundary enclosures and means of landscaping. However, a unifying trait is the absence of parked cars and the consistent appearance of low-level boundary enclosures adjacent to the footpath. Cumulatively, these create a uniformity that makes a positive contribution to the character and appearance of the area.

11. The proposal would remove the existing boundary wall. In addition, the lawn would be replaced by open concrete blocks. Whilst the blocks would enable grass to grow through, the loss of the enclosure and the appearance of parked cars to the front of the house would be distinctly at odds with the pleasing uniformity identified above. As a consequence, I conclude that the proposal would be harmful to the character and appearance of the area. It would therefore fail to accord with Policy

CS19 of the CS which requires, amongst other things, development to integrate well with the surrounding area and conserve and enhance the character of the local built environment.

Furthermore, planning permission was refused for application reference 20220445 (for the creation of a vehicular access and hardstanding to the frontage at no. 156 Wrotham Road) on 21 June 2022 on grounds of adverse impact on the character and appearance of the surrounding area (as well as on highway safety grounds). A subsequent appeal (reference APP/K2230/D/22/3305568 contained in Appendix 2) was dismissed on 15 February 2023. In respect of the impact on character and appearance the Inspector commented;

9. The area is characterised by 2 storey terraced houses, which are set back from the highway. It does not fall within a designated area; however, the front gardens are generally landscaped, which along with the park opposite provides a green and leafy street scene. Neighbouring properties typically have low level boundary enclosures. The uniformity of the properties and the soft landscaping within the front gardens make a positive contribution to the character and appearance of the area.

10. The front boundary wall has already been demolished. The proposal would cover the front garden in hardstanding, with no obvious space for soft landscaping. A full width vehicle crossover is proposed. As a result, the extent of hardstanding and presence of parked vehicles would be highly prominent in the street scene. The hardstanding would have a harsh appearance when compared with adjacent dwellings where landscaping provides a softer setting for properties. The effect of the development would be exacerbated by the presence of parked vehicles, which would give the front space a cluttered appearance that would undermine the positive contribution the front gardens and the uniformity of the terraced row make to the street scene.

11. My attention is drawn to other vehicular accesses within the vicinity. These accesses and parking areas do not contribute positively to the character and appearance of the area, so do not weigh in favour of the appeal proposal.

12. Overall, I conclude that the proposal would be harmful to the character and appearance of the area and would fail to comply with Policy CS19 of the CS, which requires development to make a positive contribution to the street scene and conserve and enhance the local built environment. The proposal would also be contrary to the Framework, which seeks to create high quality places that are visually attractive.

It is noted that nos. 231, 233 and 239 Wrotham Road have similar front garden arrangements to the application site. Therefore, if this proposal were to be allowed, it would lead to pressure for the construction of additional accesses along Wrotham Road, to the further detriment of the visual amenities of the street scene.

Overall, it is considered that the proposed development would undermine the verdant and enclosed nature, of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the NPPF 2023, to the Householder Extensions/Alterations Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

Amenity of Future Occupiers

The proposed bedrooms would exceed the minimum floor area requirements for a single bedroom in the Nationally Described Space Standard (2015) and there would be no alteration to the existing garden, which exceeds the requirement for a dwelling with four or more bedrooms in the Residential Layout Guidelines (June 2020).

It is noted that the proposal would result in the loss of an existing hallway window in the side elevation but due to there being a proposed replacement hallway window in the same elevation, there would be no loss of natural light.

In order to prevent a loss of privacy for future occupiers, any proposed bathroom/w.c./en-suite windows should be conditioned to be permanently obscure glazed.

The proposed development would improve the living conditions for future occupiers as such, the proposal would not be detrimental to the residential amenity of future occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

The closest residential properties to the application site are no. 239 Wrotham Road (located to the north) and nos. 19 and 21 Meadow Road (located to the west). No. 2 Hillingdon Road is located to the east across the roadway.

Due to the design of the proposed development, to the screening provided by boundary treatments and to the layout and orientation of the surrounding properties, there would be no adverse overshadowing or overbearing impacts to the occupiers of the surrounding dwellings.

The proposed rear dormer windows would face the rear gardens of nos. 19 and 21 Meadow Road but would have a privacy distance of some 40 metres and as such, would not cause any adverse overlooking impacts to the occupiers of those properties.

The proposed rear dormer windows would obliquely overlook the rear garden of no. 239 Wrotham Road. However, as existing rear windows have similar overlooking impacts, the occupiers of this property cannot not have an expectation of total privacy in the garden. Furthermore, dormer windows are a common feature in the residential environment and in many instances (including at the application site) are development that does not require planning permission. As such, the proposed rear dormer windows would not cause any significant adverse overlooking impacts to the occupier of no. 239 Wrotham Road.

The proposed roof lights would face the rear garden of no. 2 Hillingdon Road but would have a privacy distance of circa 30 metres and as such, would not cause any adverse overlooking impacts to the occupiers of that property.

In order to prevent any future loss of privacy to neighbours, any planning permission granted should be conditioned to preclude the insertion of any windows or openings in the side elevation of the proposed dormer facing no. 239 Wrotham Road.

Overall, the proposed development would not be detrimental to the residential amenity of surrounding occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Parking and Highways

Paragraph 114(b) of the NPPF 2023 requires new development to ensure that safe and suitable access can be achieved for all users and paragraph 115 sets out that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety.

Policy CS11 of the Gravesham Local Plan Core Strategy (2014) requires new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards. Saved Policy P3 of the Gravesham Local Plan First Review (1994) requires development to make provision for vehicle parking in accordance with KCC standards.

Saved Policy T1 of the Gravesham Local Plan First Review (1994) sets out that the impact on the transport system and environment of traffic generated by new development will be considered and Saved Policy T5

requires new accesses to be in an acceptable location and to an acceptable standard and to not give rise to danger.

According to the KCC Vehicle Parking Standards, a four or more bedroom dwelling should have three vehicle parking spaces. The application site has an existing garage (although it is noted that it is below standard width and in relatively poor condition) accessed from a private alleyway at the rear. The proposed development would result in the application property increasing from four bedrooms to five bedrooms. Therefore, there is a continuing requirement for three off-street parking spaces.

According to the KCC Residential Dropped Kerb Guidance and Self-Assessment 2023, parking spaces located perpendicular to the roadway should be a minimum of 2.4 metres (width) by 4.8 or 6 metres (depth). Six metres depth would be required if the space is in front of an access door or garage. To ensure pedestrian safety, driveway design should incorporate 2 metres x 2 metres pedestrian visibility splays on either side, where there can be no obstruction in excess of 0.6 metres height. The proposed frontage parking area would meet the size requirements and therefore sufficient space would be available for two vehicles.

It is noted that KCC Highways & Transportation do not raise an objection to the proposal, provided that the front wall is a maximum of 0.6 metres in height across the whole of the frontage (it is currently only partially 0.6 metres high) and subject to the provision and permanent retention of the vehicle parking spaces. These requirements can be the subject of conditions attached to any planning permission granted.

Therefore, the proposal would provide two appropriately sized parking spaces, with sufficient visibility on the site frontage. The garage, as an existing situation, would provide a third parking opportunity and as such, there would be three parking spaces at the application site, which would be in line with the KCC Vehicle Parking Standards.

Notwithstanding this, it should be noted that the quantity, size and visibility requirements are only part of a comprehensive highways assessment. In line with the NPPF 2023 and Saved Policy T5 of the Gravesham Local Plan First Review (1994), the proposed parking area must also allow for safe access both onto and off the site frontage.

Wrotham Road is an 'A' class road, which as a primary distributor route and as such, is relatively busy throughout the day and at peak times is very busy. There is often significant on-street parking in the vicinity of the application site (due to the proximity St Marys Church, which has no vehicle access, surrounding dwellings, which have little or no off street parking and St Georges School). In addition, the application site is located in close proximity to a large signal controlled junction, two bus stops and a pedestrian crossing.

The proposed access/parking area would not provide sufficient space to allow a vehicle to turn around within the application site. Therefore, vehicles would either reverse onto the driveway or reverse off it. As a result of the highway characteristics described above, both reversing onto and off the proposed parking area are likely to be hazardous manoeuvres, which would impede traffic flows and cause dangers to passing pedestrians and vehicles.

It is acknowledged that KCC Highways & Transportation, as the local highway authority, have not objected to the principle of an access at the application site. However, it must be highlighted that there is no Kent policy requirement for a vehicle to be able to turn within a site. In this instance, the Borough Council considers that a lack of turning area in such a busy and constrained location, would be detrimental to highway safety. Indeed, this approach has been supported by Inspector's decisions at nos. 156 and 170 Wrotham Road (contained in Appendices 1 and 2). In relation to highway safety generally at no. 156, the Inspector stated;

3. The appeal property is a mid-terrace dwelling, which is set back from the highway. Most houses along this part of the road do not have driveways and parking takes place on the street in front. The highway is a classified road (A class), with a 30mph speed limit. It is defined as a network primary distributor on the Gravesham Local Plan Core Strategy 2014 (CS) Policies Map.

4. Given the width of the site, it would not be possible to manoeuvre a vehicle on site and exit in a forward gear. Vehicles would have to reverse onto the pavement, where visibility would be obscured by adjacent boundary treatment and soft landscaping. On-street parking would further obstruct visibility of the highway. While waiting until the carriageway is clear, vehicles would also block the pavement. Although vehicles could reverse into the site, this cannot be guaranteed, and such a manoeuvre would interrupt the free flow of traffic.

5. Regardless of whether vehicles exit the site in a forward or reverse gear and even having regard to speed restrictions and recorded accidents, visibility would be obstructed by adjacent boundary treatment, vegetation and parked vehicles. As a result, vehicles manoeuvring in and out of the appeal site would lead to conditions that would be prejudicial to highway safety.

6. I have had regard to Manual for Streets 2. While I note that the highways officer from Kent County Council raises no objection to the proposal, this is subject to a condition requiring pedestrian visibility splays. No evidence of pedestrian traffic has been submitted, although I observed that the site is opposite the entrance to a public park. I agree that pedestrian visibility splays are required and there is insufficient information before me to demonstrate that these splays could be achieved.

7. My attention has been drawn to examples of houses with on-plot car parking near the appeal site. In general, these are semi-detached dwellings with wider plots, which have more room to manoeuvre on site and the continuous presence of vehicular crossovers restricts cars from parking on the street. Visibility is therefore better in these examples. There is one terraced property that has a driveway; however, the Council has confirmed that this is historic, with no record of planning permission.

8. Therefore, I conclude that the proposed development would be harmful to highway and pedestrian safety.

Similar issues were raised at no. 170 Wrotham Road and with regard to the lack of objection by KCC Highways and Transportation, the Inspector stated;

6. Through the assessment of the original application, I note that Kent Highways, as the local highway authority, raised no objection to the proposal. However, in contrast, this position was not shared by the Council's Highway Development Management Officer. Based on the evidence before me, although the guidance referred to is somewhat dated, the advice provided by the Council's in-house expert has more substance to it. Moreover, for the reasons identified above, I entirely agree with the advice provided. As a consequence, I attach limited weight to the advice provided by Kent Highways.

The applicant has highlighted that there are existing dropped kerbs at nos. 186 and 237 Wrotham Road, no. 1 Hillingdon Road and at 1 New House Lane and an existing shared dropped kerb at nos. 188 and 190 Wrotham Road. However, it is noted that there is no property known as no. 237 Wrotham Road, so it is assumed that she is referring to no. 235 Wrotham Road.

The existing vehicle accesses at nos. 235 and 219 Wrotham Road and no. 1 New House Lane (which fronts Wrotham Road) are located on the same side of the road as the application site and were formed without planning permission. On the opposite side of the Wrotham Road, several vehicle accesses exist. Nos. 188 and 190 have a shared vehicle access, which has planning permission and provides sufficient space for turning. No. 186 does not have planning permission. No. 2 Hillingdon Road (which fronts Wrotham Road) has a planning permission, which significantly pre-dates the current planning policy framework (it was granted in 1956).

It is also noted that the church, located adjacent to the application site has an access that has metal gates and a dropped kerb. However, due to the obstructions caused by railings located on either side of the hardstanding and its narrow width overall, it does not appear to be accessible by vehicles (it also does not

have planning permission).

Five of the existing residential parking areas do not have space for vehicles to turn on-site but it is noted that they have not been subject to a highway assessment as part of a planning application or their approval pre-dates current planning policy. Furthermore, it is considered that no existing access arrangement is directly comparable to the proposed development and that in any event, each planning application must be determined on its own merits, with reference to an up to date development plan policy framework.

Whilst each planning application must be treated on its own merits, the issue of precedent is a material consideration, where the circumstances at other sites are very similar to the application site. In this regard, it should be noted that nos. 231, 233 and 239 Wrotham Road have very similar front garden arrangements to the application site. Therefore, if this proposal were to be allowed, it would lead to pressure for the construction of additional accesses along Wrotham Road, which would exacerbate the adverse highway impacts at the application site.

It is noted that the application site is already accessible from the rear. This is via an existing vehicle access (from Meadow Road);



The KCC Dropped Kerb Guidance and Self-Assessment (2023) sets out that;

You may apply for a separate entrance and exit or an additional access point where one already exists, but the general rule is that increasing the number of points on a highway where vehicles turn, increases the potential for traffic conflict. We will assess the site on its own merit and will only be granted if there is no significant impact to on street parking demand.

Therefore, multiple accesses to a single property are not encouraged by KCC, especially in areas where there is on-street parking demand (such as around the application site).

In relation to the existing garage at the rear of the application site, the applicant has highlighted that the narrowness of the access alleyway and on-street parking located close to the alleyway entrance makes it very difficult to manoeuvre a modern sized vehicle in and out. In particular, they state that their work van and taxi would be too wide to fit. They also state that they would be unwilling to leave their vehicles at the rear due, to a lack of security and poor lighting.

It is considered that the access and security issues regarding the garage and its substandard size are likely to lead to this not being a viable parking option for the applicant but that this is a personal circumstance. Future occupiers may feel differently and there is scope for a replacement garage to be provided that is

more spacious and secure. It is also noted that surrounding occupiers appear to use the alleyway for vehicle access to their garages. According to the submitted details, the rear access has a width of some 2.5 metres, which would allow a variety of vehicles to use it.

The applicant and local residents have set out that a reduction in on-street parking outside the application site would be beneficial. The applicant specifically highlights that it would aid traffic flows. Some local residents suggest that current on street parking adversely impacts upon persons attending St Mary's Church and St George's School and on parking for emergency vehicles, whilst another resident suggests that the loss of on-street parking would exacerbate existing parking difficulties for residents and non-residents in the area.

Reference to Kent County Council Dropped Kerb Guidance and Self-Assessment (2023) set out above suggests that existing on street parking should be retained. At the case officer's site visit, it was noted that there was extensive on-street parking in the area surrounding the application site on Wrotham Road but that traffic was flowing freely. Parking demand in this area is high due to the proximity St Marys Church, which has no vehicle access, surrounding dwellings, which have little or no off street parking and St Georges School. Therefore, the loss of on-street parking outside the application site would exacerbate existing on-street parking pressures but would have little impact on traffic flow.

The applicant has provided a number of other highways justifications for the proposal (in addition to those discussed above). These are summarised (in italics) and commented on as follows;

- *Planning Guidance Note No.6 (PGN6) no longer applies* – PGN6 has been replaced with updated guidance and although the requirement for providing a turning area for all driveways on classified roads is not specified, the Gravesham Driveway Dropped Kerb Guidance (2023) supports proposals on classified roads that can be achieved 'safely' and generally sets out that 'permission for a dropped kerb is necessary to ensure that works are constructed correctly taking into consideration the safety of other road users ...'. Therefore, if a proposed driveway on a classified road would have adverse highway safety impacts without a turning area being provided, then it would not be in line with the current guidance.
- *The proposal would benefit St Mary's Church by providing improved funeral and disabled access* – It is noted that the church support the proposal because it would extend their currently insufficient width parking area (marked on the roadway 'keep clear'). Whilst this would be beneficial for vehicle access to the church, it is not necessarily the most appropriate method for achieving this. If the width of this marked area on the roadway is insufficient, it would be preferable for this to be taken up with the highway authority rather than by being reliant upon a neighbour's dropped kerb.
- *The proposal would facilitate the installation of electric vehicle (EV) charging points* – On-site EV charging would be a positive feature of the proposal.
- *The proposal would reduce vandalism to the applicant's vehicles* – This would be a positive feature of the proposal but it is noted that parking on an essentially open frontage would still provide opportunities for vandalism.

Taking all of the above issues into account, it is considered that the highways benefits of the proposal (allowing the applicant to park her vehicles on-site, reduced opportunities for vandalism, allowing on-site EV charging and improving access to the Church) would not overcome the negative impacts (lack of turning space leading to hazardous manoeuvres, impeding traffic flows and causing dangers to passing pedestrians and vehicles and an exacerbation of existing on-street parking pressures). In addition, it is noted that an existing rear access is available and would provide a viable alternative to the proposed frontage parking. Whilst the personal circumstances of the applicant would not allow her to utilise the rear access, it nonetheless provides an opportunity for future occupiers to do so.

Furthermore, if this proposal were to be allowed, it would lead to pressure for the construction of additional accesses along Wrotham Road, which would exacerbate the adverse highway impacts at the application

site.

Overall, the proposal would be detrimental to highway safety and contrary to CS11 of the Gravesham Local Plan Core Strategy September 2014, Saved Policies T1 and T5 of the Gravesham Local Plan First Review November 1994, to paragraph 114(b) of the NPPF 2023, to the Householder Extensions/Alterations Design Guide (2021), to the GBC Front Driveway Guidance 2023, to the Gravesham Driveway Dropped Kerb Guidance (2023) and to the Kent County Council Dropped Kerb Guidance and Self-Assessment (2023).

Biodiversity

Biodiversity Net Gain (BNG) is a mandatory requirement for all new development and proposals must deliver a BNG of at least 10% unless they are exempt. In this instance, the proposed development is a householder proposal and therefore is exempt from BNG.

Notwithstanding the BNG exemption, biodiversity is an important consideration in all new development. Policy CS12 of the Gravesham Local Plan Core Strategy (2014) states that there will be no net loss of biodiversity in the Borough and that opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within Biodiversity Opportunity Areas and within new development.

The proposed development would result in the loss of some planting from the site frontage, which would be detrimental to biodiversity but due to space being available for landscaping, it is considered that any adverse biodiversity impacts can be mitigated via a landscaping condition attached to any planning permission granted. As such, the proposal would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Surface Water run-off

The hard surfacing of front gardens leads to increases in the flow of surface water to the sewer system. Policy CS18 of the Gravesham Local Plan Core Strategy September 2014 seeks to ensure that the run off from such proposals has, as a minimum, no greater adverse effect than the existing situation. The Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023 require new frontage parking to introduce permeable paving in order to minimise rainwater run-off issues and state that there should be no water run-off from the forecourt onto the public highway.

The details submitted relating to the surfacing for the proposed parking area show that the surface would be permeable. Therefore, it is considered that the proposed development would be in line with Policy CS18 of the Gravesham Local Plan Core Strategy September 2014, the Householder Extensions/Alterations Design Guide (2021) and the GBC Front Driveway Guidance 2023.

Any Other Material Planning Considerations

The application site is located in the buffer zone of a historic landfill site (Woodfield Avenue) and as such, there may be potential for ground contamination. In order to ensure that there are no adverse contamination issues during the construction work or for future occupiers, a watching brief condition should be added to any planning permission granted.

The application site is located within Groundwater Source Protection Zone 2, a Site of Special Scientific Interest (SSSI) Impact Risk Zone, an area of multi-period archaeological potential, a smoke control area and is in close proximity to gas pipelines (along the site frontage). However, as the proposed development would be within the confines of an existing residential garden and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to any sensitive habitats, groundwater or archaeology. With regard to the smoke control area, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted. With regard to the gas pipelines, the applicant should be made aware of them via an informative on any planning permission granted.

Local residents have raised a number of concerns, the majority of which have been covered in the above discussion. The outstanding issues are summarised (in italics) and commented on as follows;

- *Supports the proposed loft extension provided a party wall agreement is put in place* – This is not a planning matter and is therefore is not a material consideration in the determination of this application.
- *If approved, measures to improve parking in the area should be considered, such as parking permits and one way traffic in Hillingdon Road from Singlewell Road* – As a proposal at an individual dwelling, any adverse highways impacts would not be of sufficient scale so as to justify large scale highway alterations in the surrounding area.

Conclusion

The proposed development would have no adverse residential amenity, biodiversity, surface water run off, contamination, groundwater, archaeological or sensitive habitats impacts and the proposed loft conversion would be acceptable in terms of design. However, the proposed vehicle access and parking area would be out of character with the application property and its surroundings and would be detrimental to visual amenity and highway safety.

Overall, it is considered that the adverse impacts of the proposed development attract significant weight and would significantly and demonstrably outweigh the benefits of the proposal. Therefore, following a thorough assessment of the application and all material planning considerations, it is considered that the proposed development cannot be supported.

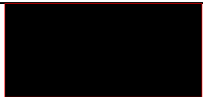
Recommendation

That planning permission should be refused on the following grounds;

1. By virtue of a lack of an on-site turning area, the proposed development would make insufficient provision for safe ingress and egress to and from the application site, leading to drivers presenting dangers to passing vehicles and pedestrians and impeding the free flow of traffic on Wrotham Road. As such, the proposed development would be detrimental to highway safety and be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (2014), to Saved Policies T1 and T5 of the Gravesham Local Plan First Review (1994), to paragraph 114(b) of the National Planning Policy Framework 2023, to the Householder Extensions/Alterations Design Guide (2021), to the GBC Front Driveway Guidance 2023 and to the Gravesham Driveway Dropped Kerb Guidance (2023).

2. The proposed development would undermine the verdant and enclosed nature of the site frontage, to the detriment of visual amenity. As such, the proposal would be detrimental to the character and appearance of the application property, to the visual amenities of the surrounding street scene and be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (2014), to paragraph 135 of the National Planning Policy Framework 2023, to the Householder Extensions/Alterations Design Guide (2021) and to the GBC Front Driveway Guidance 2023.

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	10 December 2024	Dated:	10 December 2024