

Delegated Report

Householder Planning Application

Planning Application No: 20260312

Location: 4 Sandown Road Gravesend Kent DA12 5EN

Description: Erection of part single storey part two storey side and rear extensions.

Applicant: Eden Daly

Site Visit Date: 31.03.26

Submitted Documents/Plans

Application Form;
Drawing No. SR-001 – Site Location Plan and Block Plans – Existing and Proposed;
Drawing No. SR-002 – Floor Plans Roof Plan and Elevations – Existing; and
Drawing No. SR-003 – Floor Plans Roof Plan and Elevations – Proposed.

Relevant Planning History

No relevant history.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- 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 12 – Achieving Well-Designed Places

Supplementary Planning Guidance

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

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Local Ward Councillors

No comments received.



KCC Public Right Of Way

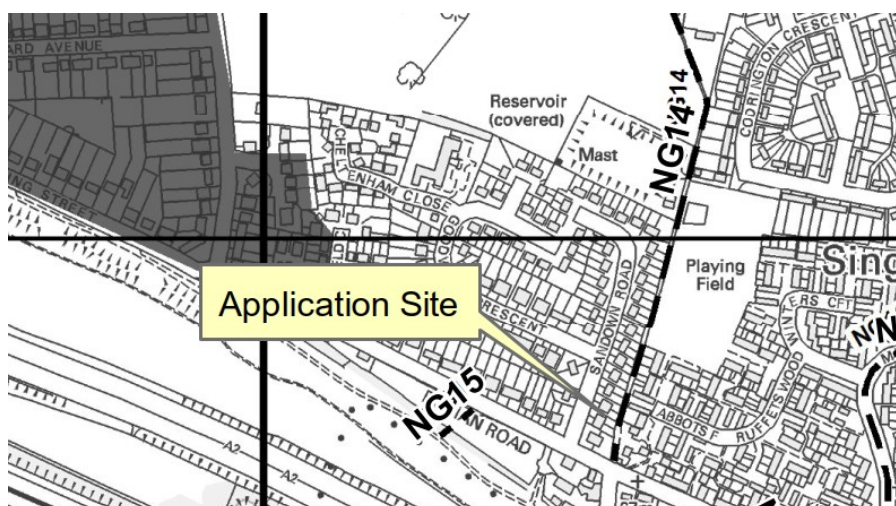
Public Right of Way NG14 lies to the east of the property and will remain unaffected by the proposals. I enclose a copy of the Public Rights of Way network maps showing the line of the path for your information.

The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary closures be required to ensure public safety then this office will deal on the basis that:

- The applicant pays for the administration costs.
- The duration of the closure is kept to a minimum.
- Alternative routes will be provided for the duration of the closure.
- A minimum of six weeks' notice is required to process any applications for temporary closures.

This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any building materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.

Map Extracts:



Key

- Public Footpath
- Public Bridleway
- Restricted Byway
- Byway Open to All Traffic

20260312

Produced by the KCC Public Rights of Way and /
Please note: this map extract is not a legal record



Neighbouring properties

Four surrounding properties were consulted, a site notice was displayed on 31.03.26 and the application was advertised in the paper. No comments were received and the overall consultation period expired on 24.04.26.

Site Description

4 Sandown Road is a two storey semi-detached property fronting the eastern side of the road. To the rear of the property lies Public Right of Way NG14.

Site Photo



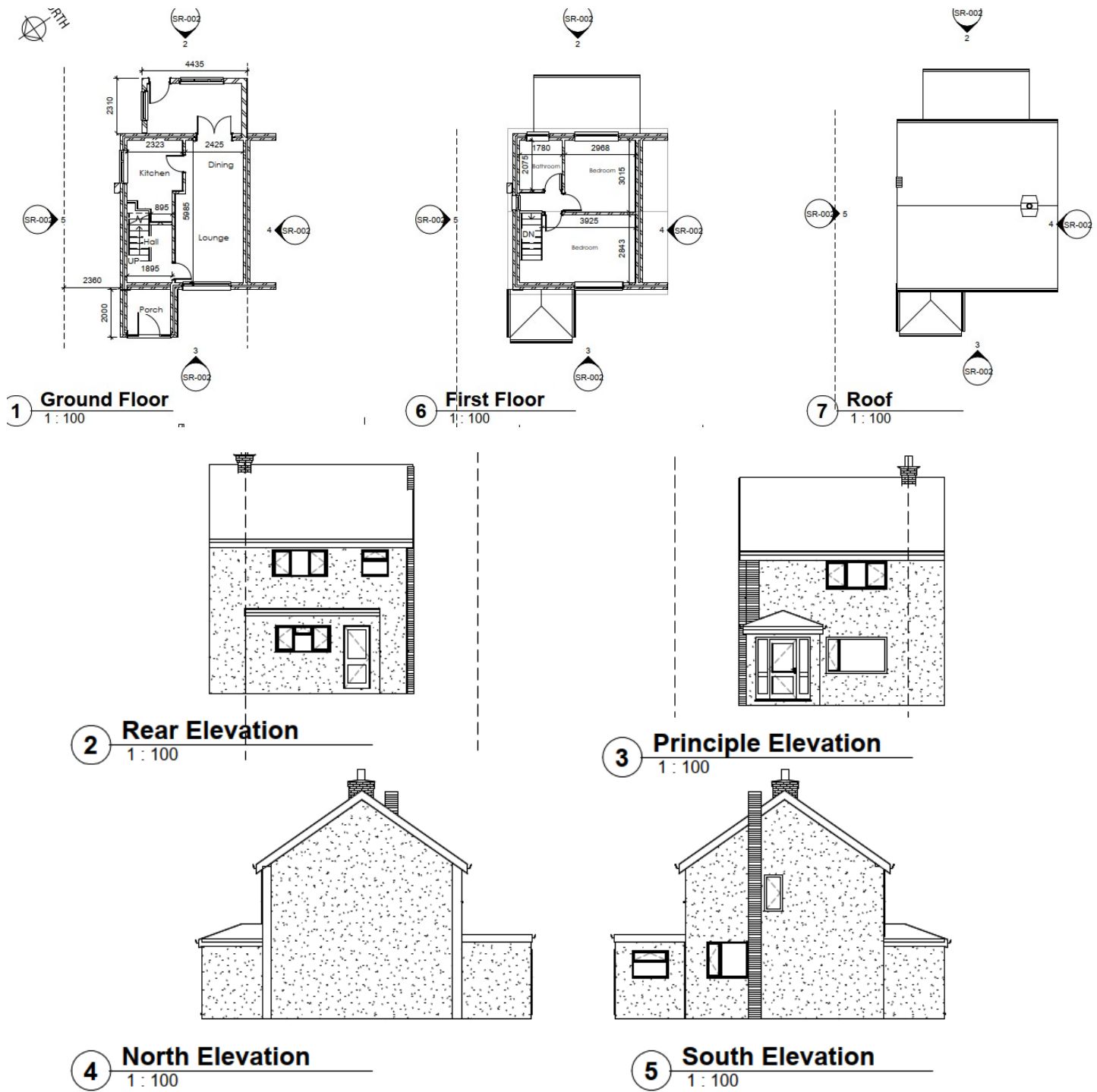
This application proposes the erection of a part single storey part two storey side and rear extensions.

Proposed Development

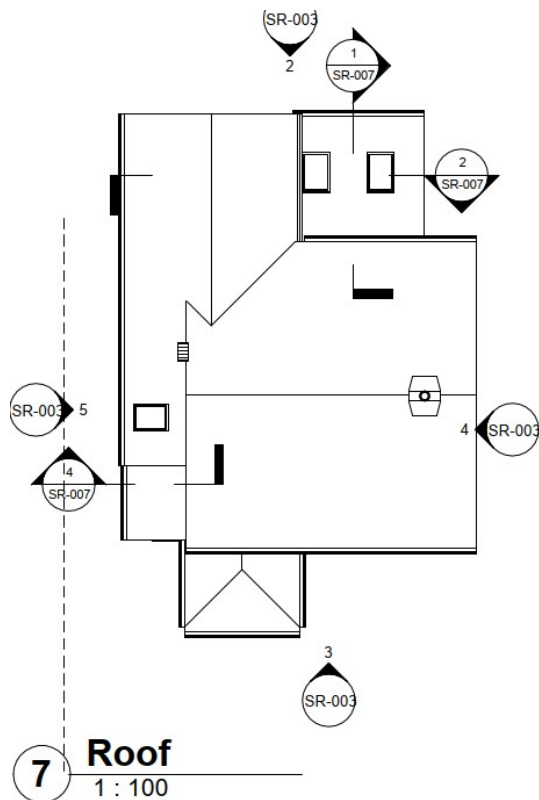
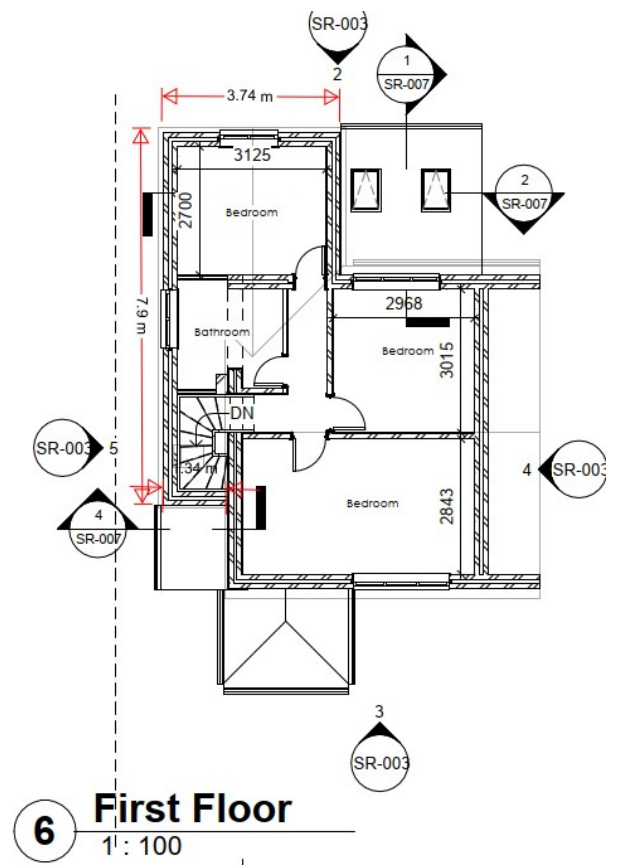
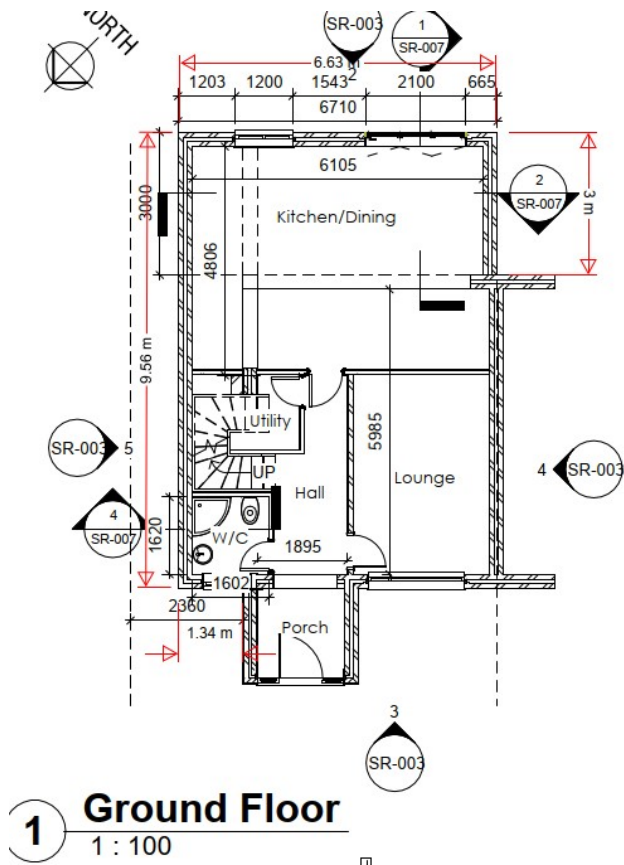
The development would create space for internal layout alterations including an enlarged kitchen/dining area, a new utility room and new WC at ground floor level. At first floor, an additional bedroom would be created.

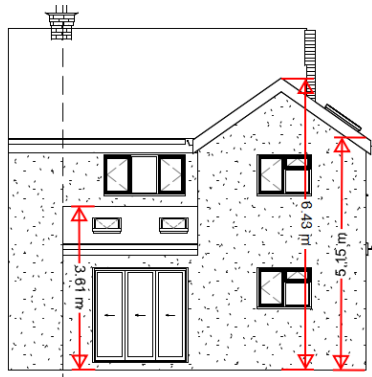
Dimensions are indicated by the case officer measurements in red and black below:

Existing Plans and Elevations:

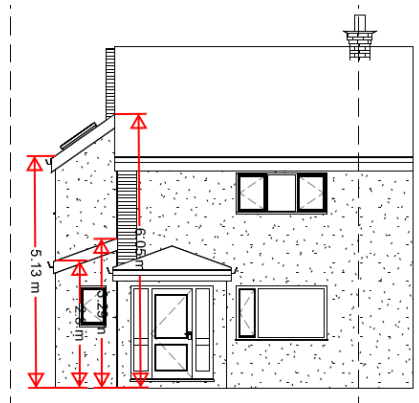


Proposed Plans and Elevations:

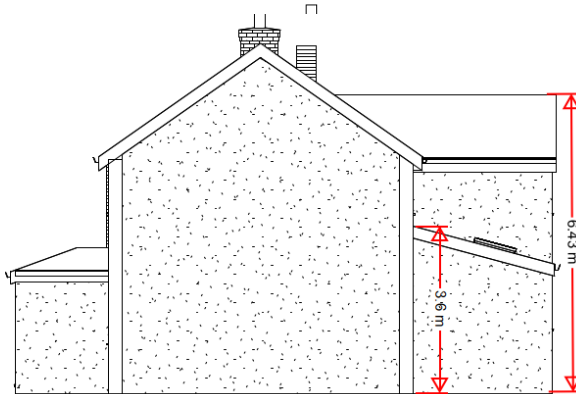




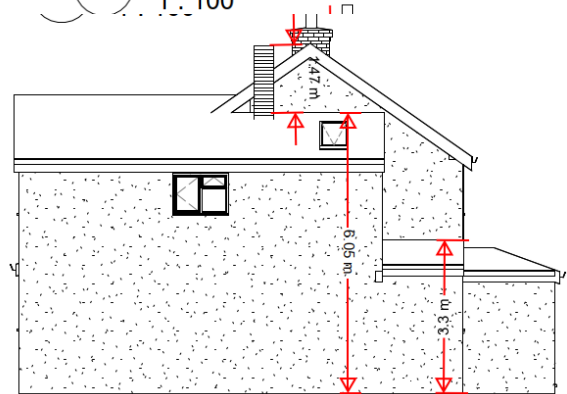
2 Rear Elevation
1 : 100



3 Principle Elevation
1 : 100



4 North Elevation
1 : 100



5 South Elevation
1 : 100

Officer's Analysis

Design, Character and Appearance

Policy CS19 (Development and Design Principles) (LPCS) (2014) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area. Moreover, Section 12 (Achieving well- designed places) of 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. It states developments should function well and add to the overall quality of the area, be visually attractive and sympathetic to local character.

The Design For Gravesham Design Code (2024) is a strategic document that sets out Gravesham's vision and expectation for quality place-making. Gravesham's Householder Extensions/Alterations Design Guidance SPD (2021) set out key principles for new developments. Generally, the SPD (2021) highlights the importance of new development complimenting and corresponding to existing character and the wider context.

The Householder Design Guide (2021) sets out the design expectations for the Borough. Key elements that are relevant to this proposal have been included below:

Character and design quality

Any proposed extensions and alterations to a house should respect the original character of the existing dwelling, complement and correspond with the character of neighbouring properties and the local area. It should be noted that this does not always mean an exact replication of the existing character.

9.2 Your proposal should reflect and respect the original character and respond to its features. In order to achieve this as a starting point all residential extensions and alterations should be subordinate to the host property/building, allowing the original building to remain dominant.

Materials

9.9 Extensions should normally be constructed using matching materials to the main dwelling. Matching bricks or render should be used along with similar coursing and pointing detailing and colours. Roof tiles or materials should match the existing in terms of materials, texture, colour and size. Where appropriate, extensions may be constructed of an alternative material if this is consistent with other development in the area and where the extension would still be clearly subordinate to the main dwelling.

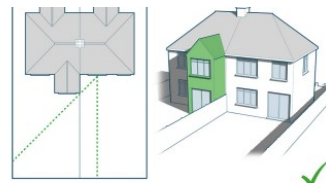
10 Extensions and Alterations

10.1 This section outlines the type of residential extensions and alterations that the Council may consider acceptable. Each planning application will be considered by the Council on its merits on the basis that each property is different.

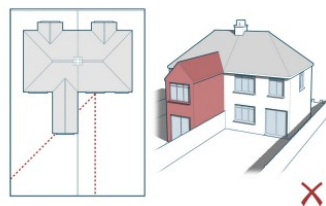
Two Storey and First Floor Rear Extensions

10.3 Two-storey rear extensions are often desirable as they create more space within a home, however they are not appropriate in all circumstances e.g. mid-terraced properties, and need to be carefully designed to avoid negatively impacting neighbouring properties. Proposals for two-storey rear extensions should consider the surrounding context, and ensure that:

- **Depth:** The extension does not dominate the original property. This can cause the site to appear overdeveloped, and cause long dark internal spaces to be formed. Extensions to extensions will generally not be supported.
- **Height:** two storey extensions can have very significant impact on neighbouring amenity, so should generally not be built up to site boundaries with neighbouring gardens / properties.
- **Width:** Extensions should not be of greater width than the original building.
- **Design:** Taller extensions are of greater visibility, and should incorporate roof designs to reflect, tie in with and not overwhelm the main property's roof. Patterns and proportions of windows should reflect the host building and local character.
- **Materials:** Using matching external materials and window / door frames is especially relevant for two storey extensions.
- **Overlooking:** Extensions should avoid inserting any flank windows, or involve raised platforms where they would allow new, or increased overlooking views into neighbouring gardens / properties.
- **Light / Outlook:** The 45 / 25 degree rule will be used to assess the impact of the extension on neighbouring light / outlook.
- **Garden Space:** Adequate garden area for the enlarged house should be retained following development.



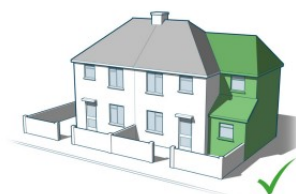
A two storey extension should comply with the 45 degree rule. (See Appendix 1).



Two Storey Side

10.5 Two storey extensions can have a more significant impact on the appearance of the street. Care is also needed when considering the relationship between any proposed extension and the boundary with neighbouring properties as the separation between properties can provide access routes to the rear of the property and in some locations are part of the character of the area. Depending on the orientation of the neighbouring property, side extensions also have the potential to impact their amenity. To ensure these potential issues are resolved, two storey side extensions should be designed in accordance with the guidance below.

- **Footprint:** Extensions should generally aim to appear subservient to the host building by lying behind the main front building line, though where designed well or having regard to positive local character, other approaches can be supported. See advice of extensions to corner properties in the following section.
- **Height:** Extensions should not exceed the eaves height of the host building.
- **Width:** Extensions should generally be no greater than half the width of the host building. The existing rhythm of the street, including for example characteristic gaps between properties, the symmetry of pairs of semi-detached homes or groups of terraced houses, should not be unreasonably interrupted. A minimum gap of 1 metre should be retained between the extension and the flank boundary.
- **Design:** Extensions are of greater visibility, and should incorporate roof designs to reflect and generally be subservient to the main property's roof. The use of flat or false pitched roofs visible from the street should be avoided. Patterns of windows should reflect the host building and local character. Walls to extensions should not form the site boundary with the public highway, as these can be oppressive and encourage antisocial activities.
- **Materials:** Matching external materials and window / door frames should be used.
- **Overlooking:** Extensions should avoid inserting any flank windows where they would allow new, or significantly increased overlooking views into neighbouring gardens / properties.
- **Light / Outlook:** The 45 / 25 degree rule will be used to assess the impact of the extension on neighbouring light / outlook.



Ground floor set back 0.5m



Unacceptable flat roof

Two storey side extensions should be subordinate in scale to the original house.



Side extensions should be set back and set in to avoid the 'terrace effect'.

- **Garden Space:** Adequate garden area for the enlarged house should be retained following development
- **Bin Storage:** Adequate provision for discreet storage of waste bins in the front garden

The proposed external materials would largely match the existing, which is desirable to ensure a good visual relationship between the existing dwelling and proposed new development, however, the proposal also needs to meet other design principles in terms of scale, design and character.

In terms of the character and appearance of the area, it is noted that there are examples of two storey extensions within the local vicinity. However, it should be noted that the extensions are different to what is proposed here and many have been approved prior to the adoption of Gravesham's current Local Plan Core Strategy (2014), Gravesham's Design Guidance for Householders (2021) and Design for Gravesham (2024). Therefore, although the principle of a two-storey extension could be considered to be acceptable in this area, this would depend on scale, design, any additional elements, siting, and would need to accord with the aforementioned Design Guidance and Planning Policy.

In the case of this application, the development is considered to be poor design resulting in an incongruous and dominant dwelling to the detriment of the character and appearance of the host dwelling and surrounding area. The proposed extensions and alterations are considered to be excessive in scale and footprint and would result in an awkward amalgamation of roof forms which would, in particular, negatively impact the appearance of the dwelling from the street scene. The roofs of the proposed single storey and two storey extensions would jut out from the flank wall of the dwelling, at odds with the existing roof forms and eaves heights. The Planning Inspector for a dismissed appeal at 22 Mulberry Road (reference: 6001413 - Appendix 1) found incongruous roof forms harmful to the character and appearance of the dwelling and surrounding area. In the case of the appeal, this was a combination of flat and pitched roof elements, however in the case of this application, it is considered that the Inspectors observations remain relevant due to the incongruous appearance of the proposed development. The Inspector states that the roof elements would *'result in a visually disjointed addition that would not relate comfortably to the existing roofscape. Although the external materials would match the host dwelling, matching materials alone do not resolve the issues of massing, proportion and roof form. The increased prominence of the extended first-floor envelope, when combined with the loss of spacing to the boundary, would result in a dominant and visually intrusive form of development that would fail to integrate with the established character of the area. When viewed from the road as well as from neighbouring dwellings, it would thus appear as an incongruous addition.'* In addition, the Inspector confirms at paragraph 8 that other examples of extensions in the wider area carries limited weight in support of the proposal: *'The appellant refers to the existing first-floor rear extension at No 20 and to other examples in the wider area. However, the extension at No 20 differs materially in its positioning, scale and form, and pre-dates the adoption of Gravesham's Design Guidance SPD (2024). As such, it carries limited weight in support of the proposal. Other cited examples are dispersed within a wider geographical context, do not replicate the same boundary relationship, and do not demonstrate a consistent pattern that would alter the prevailing character of Mulberry Road. I have assessed the proposal on its own merits and find that the developments referred to are not entirely comparable or relevant. Consequently, they attract only very limited weight.'*

Therefore, overall, the proposal is considered to represent poor design, that would result in an incongruous, dominant and unsympathetic development, to the detriment of the appearance of the existing dwelling and surrounding area. As such, the proposal would be contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (LPCS) (2014) and Section 12 of the National Planning Policy Framework (2024).

Amenity of Future Occupiers

Gravesham's SPG2 – Residential Layout Guidelines (RLG) (2020) sets out expected room sizes and garden space post development. The proposed block plan indicates sufficient garden depth and area would be retained post development. In terms of room sizes, the proposal would also accord with the guidance. Overall, the proposal is considered to safeguard the amenity of future occupiers in accordance with Policy CS19 (LPCS) (2014) and Section 12 (NPPF) (2024).



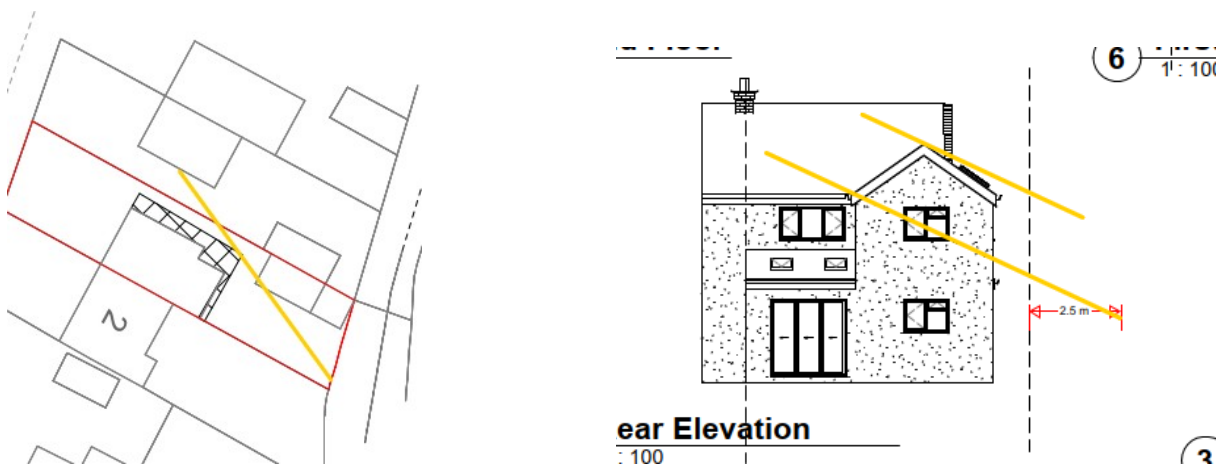
Neighbouring Amenity

No neighbour representations were received as a result of the consultation carried out for this application.

Site Photo showing rear of property



Neighbouring amenity is considered in terms of whether development would cause a sense of enclosure, loss of light, loss of privacy or loss of outlook. No information has been provided on the plans with regards to any light impact the development may have on neighbouring properties. The single storey elements are not considered to result in a detrimental impact, and it is considered that the two-storey element in situ would not detrimentally impact No. 2 Sandown Road. However, an approximation of the 25 degree rule has been made below to consider the impact on No.6, using the plans provided:



The indication is that the two storey elements would not detrimentally impact the light to neighbouring property No.6 Sandown Road. There would already be some light impact at ground floor level due to the

existing dwelling itself. However, at first floor level, the development is not considered to detrimentally impact the light to the windows in the flank elevation of No.6. In addition, in situ, the development is not considered to result in loss of outlook or cause a sense of enclosure. In terms of privacy, it is noted that there is one window proposed in the flank elevation of the extension at first floor level, however this would serve a bathroom and could therefore be appropriately conditioned to ensure privacy. Therefore, overall the development accords with Policy CS19 (LPCS) (2014) and Section 12 (NPPF) (2024) in terms of safeguarding neighbouring amenity.

Parking and Highways

The plans show an additional bedroom would be created, however there is an existing hardstanding area in situ. As such there are no concerns in terms of highways and parking that arise as a result of this proposal.

KCC Public Right of Way have raised no concerns in relation to the proposal. If planning permission were to be forthcoming, an informative relating to the Public Right of Way could be added to the decision notice.

Any Other Material Planning Considerations

Archaeology

The site lies within an area of multi-period archaeological potential. However, the proposed development is unlikely to have any archaeological impact.

Gas Pipelines and the Health and Safety Executive

The site lies within proximity of Gas Pipelines. As such, if planning permission were to be forthcoming, an appropriately worded informative could be added to the decision notice, advising the applicant that they must contact Southern Gas Networks before carrying out any works.

Lower Thames Crossing (LTC) Buffer Zone

As the site lies within the LTC buffer zone, if planning permission were to be granted, an appropriately worded condition could be added to the decision notice.

Conclusion

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

The proposal is considered to represent poor design, that would result in an incongruous, dominant and unsympathetic development, to the detriment of the appearance of the existing dwelling and surrounding area. As such, the proposal would be contrary to Policy CS19 of Gravesham's Local Plan Core Strategy (LPCS) (2014) and Section 12 of the National Planning Policy Framework (2024).

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:	R Hart
Dated:	14th May 2026	Dated:	14 th May 2026

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