



Delegated Report

Householder Planning Application

Planning Application No: 20230047

Location: 82 Snelling Avenue Northfleet Gravesend Kent

Description: Demolition of two out houses and building two storey side extension.
Enlargement of first floor landing at the top of the stairs

Applicant: Mr A Sandhu

Site Visit Date: 15 March 2023

Submitted Documents/Plans

Householder Planning Application form;
Drawing no. SAP.01 Existing and proposed ground floor layouts;
Drawing no. SAP.02 Existing and proposed first floor layouts;
Drawing no. SAP.03 Existing and proposed roof plans;
Drawing no. SAP.04 Existing and proposed front and rear elevations;
Drawing no. SAP.05 Existing and proposed side elevations;
Drawing no. SAP.06 Location plan;
Drawing no. SAP.07 Existing block plan; and
Drawing no. SAP.08 Proposed block plan.

Relevant Planning History

Reference	Description	Decision	Decision Date
20110244	Erection of detached garden shed at rear to replace garage previously approved under planning permission reference number 20100743.	Permitted	04.05.2011
20110030	Application for non-material amendment to planning permission reference number 20100743 to replace the flat roof with a pitched on single storey rear extension.	Approved	31.01.2011
20100743	Erection of part single and part two storey rear extension and single storey front extension to form kitchen/dining room, shower room/wc and porch at ground floor level with a bedroom at first floor level; erection of side gate and a detached garage at the rear.	Permitted	27.09.2010
20070418	Construction of a vehicular access	Permitted	13.08.2007

Development Plan

Gravesham Local Plan Core Strategy (September 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
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 12 – Achieving sustainable development and well-designed places

Supplementary Planning Guidance

- 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)
- Householder Extensions/Alterations Design Guide (2021)
- Kent County Council Residential Dropped Kerb Guidance and Self-Assessment (2022)

Consultations, Publicity and Representations

GBC – Highways Officer

I would consider this is a refusal.

The parking on the drive is lost, (it being noted that the garage has already been converted with permission) whilst the bedrooms increase to four and as correctly identified the extension could be adapted to a one bedroom dwelling with only some simple modifications.

Car parking should be 2 spaces minimum. Guidance suggests two spaces for a 4 bedroom property. Also, as it would be possible to divide the property at some future date to ensure nil detriment would require two parking spaces, one for the existing dwelling and then one space would be required for a one bedroom property. A secure cycle space is required for the additional bedroom/property.

All parking should be within the red line, although I'm not aware of the status of the verge, my assumption would be amenity land which should be there for the enjoyment of local residents and not obstructed by parked vehicles.

In terms of the parking guidance, the adopted supplementary is SPG4, which is a maximum guidance, which technically means that no parking is strictly necessary. However, the National Planning Policy Framework suggests, except in certain special circumstances, this approach is no longer relevant.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

Therefore, given the current Gravesham Borough Council guidance is dated, the only other local guidance is that issued by Kent County Council, the Highway Authority. However, even this is dated, and a review is in progress. The relevant document is the Kent Design Guide: Interim Guidance Note 3 Residential Parking.

https://www.kent.gov.uk/_data/assets/pdf_file/0019/15535/Supplementary-guidance-residential-parking.pdf

GUIDANCE TABLE FOR RESIDENTIAL PARKING

LOCATION	CITY/TOWN CENTRE	EDGE OF CENTRE	SUBURBAN	SUBURBAN EDGE/VILLAGE/RURAL
ON-STREET CONTROLS	On-street controls preventing all (or all long stay) parking	On-street controls, residents' scheme and/or existing saturation (Note 3)	No, or very limited, on-street controls	No on-street controls, but possibly a tight street layout
NATURE OF GUIDANCE	MAXIMUM (Note 1)	MAXIMUM	MINIMUM (Note 6)	MINIMUM (Note 6)
1 & 2 BED FLATS	1 space per unit	1 space per unit	1 space per unit	1 space per unit
FORM	Controlled (Note 2)	Not allocated	Not allocated	Not allocated
1 & 2 BED HOUSES	1 space per unit	1 space per unit	1 space per unit	1.5 spaces per unit
FORM	Controlled (Note 2)	Allocation possible	Allocation possible	Allocation of one space per unit possible
3 BED HOUSES	1 space per unit	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit
FORM	Controlled (Note 2)	Allocation possible	Allocation of one space per unit possible	Allocation of one or both spaces possible
4+ BED HOUSES	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit	2 independently accessible spaces per unit
FORM	Controlled (Note 2)	Allocation of one space per unit possible	Allocation of both spaces possible (Note 7)	Allocation of both spaces possible (Note 7)
ARE GARAGES ACCEPTABLE? (Note 4)	Yes, but with areas of communal space for washing etc.	Yes, but not as a significant proportion of overall provision	Additional to amount given above only	Additional to amount given above only
ADDITIONAL VISITOR PARKING (Note 5)	Public car parks	Communal areas, 0.2 per unit maximum	On-street areas, 0.2 per unit	On-street areas, 0.2 per unit

Kents review of parking standards can be viewed here:

<http://kentdg.wengine.com/wp-content/uploads/2021/11/Parking-Standards-Guidance-Kent-Design-Guide-V1.0.pdf>

But it is believed this has not been formally adopted yet by the County Council as the reference is to the draft document.

<https://letstalk.kent.gov.uk/kentdesignguide>

Kent Design Guide

Consultation has concluded

Working with our partners we have refreshed and updated the Kent Design Guide as a website, and we welcome your views.

The [Kent Design Guide](#) provides guidance on design for the built environment. It is intended as a useful resource for house builders, architects, engineers, town planners, other professionals working in the built environment, and residents. Design guidance is important so that good design standards are met and design leads to sustainably built places and communities in Kent and Medway.



[Click on image to visit the Kent Design Guide website](#)

There have been many changes in design standards and practices in recent years. These changes call for a refresh of this Guide, which was [last published in 2005](#). This latest version will be available as a website to ensure the Guide remains current, relevant and can be updated regularly.

The Kent Design Guide follows the format of design guidance that was set out in the [National Design Guidance](#) published in 2019. This is predominantly to set design guidance around 10 key characteristics that are there to help shape places and communities. The Kent Design Guide uses these characteristics for its own context across the county and enriches this further with case studies to highlight well-designed places.

We welcome your feedback on the draft website and in particular your views on how easy it is to find the information you require, and whether the content is clear, understandable, and informative.

Click on the image above or the weblink in the 'Important links' section to access the draft Kent Design Guide website. Please note that the website is still in development so there are some placeholders where we are waiting for images. Full technical guidance for Active Design and Active Travel will be available from the end of November 2021.

Timeline

-  **Consultation opens**
8 November 2021
-  **Consultation closes**
17 January 2022
Contributions are closed for evaluation and review.
-  **Consultation report**
The outcomes are documented here.

Important links

 [Draft Kent Design Guide website](#)

Frequently asked questions

-  Who is the Kent Design Guide aimed at?
-  How does it link to the national design

Table 1: Residential Car Parking Standards

	City / Town Centre ¹	Edge of Centre ¹	Suburban	Rural
1 & 2 Bed Flats	1 space per unit	1 space per unit	1 space per unit	1 space per unit
1 & 2 Bed Houses	1 space per unit	1 space per unit	1 space per unit*	2 spaces per unit
3 Bed Houses	1 space per unit	1 space per unit	2 spaces per unit	2 spaces per unit
4+ Bed Houses	1 space per unit	2 spaces per unit	2 spaces per unit*	3 spaces per unit
Visitor Parking	None	0.2 per unit	0.2 per unit	0.2 per unit

¹ Locational category of individual sites subject to discussion with the Local Planning and Highway Authorities. Car parking standard is for guidance and a lower provision can be considered where effective mitigation measures are in place or proposed e.g.:-

- Car Clubs;
- Travel Plans;
- Controlled Parking Zones;
- Availability of sustainable transport modes.

Supporting evidence is also likely to be required (e.g. local car ownership data, parking stress surveys, evidence from similar sites etc.

* An additional "off plot" parking space may be required for some properties at the discretion of the Highway Authority depending on the size of the property and the layout and capacity of the adjoining road network.

So although not adopted by Gravesham Council, the only local guidance that is still relevant has been used, and this is less demanding than the emerging guidance in the draft review of the Kent Design Guide, which would require 3 spaces for a 4 bedroom dwelling, or being pragmatic one space to sustain the existing situation for the three bedroom property, plus one extra space associated with the new bedroom,

which still equates to two spaces and none can be provided.

Southern Water

Southern Water requires a formal application for any new connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service:

developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

In situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.

- Reuse
- Infiltration
- Watercourse
- Storm sewer
- Combined Sewer

Guidance on Building Regulations is here: gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Neighbouring properties

The application was publicised by a site notice and to nine neighbouring properties by letter. One representation has been received and is summarised as follows;

- No details have been provided of how the extended property would be used.
- The extension would have its own front door and space to accommodate a kitchen, bathroom and staircase and may be intended to be used as a separate dwelling.
- If permitted, conditions should be used to ensure that the extension is not used separately or leased or sold as a separate dwelling.

Officer's Analysis

Design, Character and Appearance

Paragraph 130 of the National Planning Policy Framework 2021 (NPPF 2021) 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 134 of the NPPF 2021 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 two storey side extensions, the Householder Extensions/Alterations Design Guide (2021)

highlights that they can have a significant impact on the appearance of the street and that the separation between properties can be part of the character of an area. Specially it states that such extensions should subservient to the host building, lie behind the main front building line, should not exceed the existing eaves height and be no greater than half the width of the host building. It also states that the characteristic gaps between properties and the symmetry of pairs of semi-detached homes should not be unreasonably interrupted and a minimum gap of one metre should be retained between an extension and the flank boundary. Two storey flat roof elements should be avoided, especially when they are visible from the street scene.

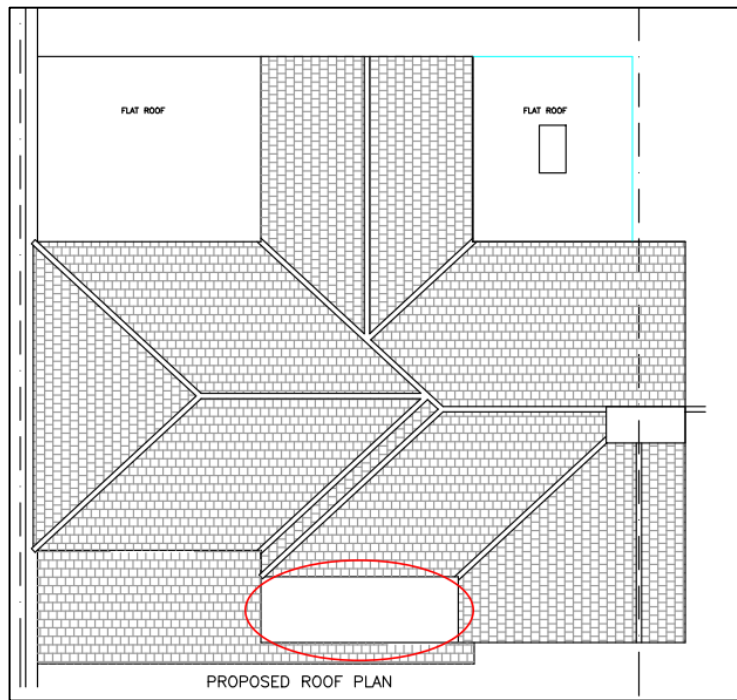
The application property is a two storey, semi-detached dwelling located in an urban area where there are a number of similarly designed properties. The width of the building is some 7 metres and a spacious side garden separates the property from the dwelling at no. 80 Snelling Avenue. The property has been subject to a part single storey and part two storey rear extension and a front extension and there is a large outbuilding in the rear garden. As such, the extent of built development at the application site is already significantly greater than the original property and many of the surrounding dwellings.



Google street view November 2022

The proposed development would add significant size and bulk to the building and have a width of 4.2 metres (when half the width of the existing building is only 3.5 metres). The proposed ground floor would project beyond the main front building line (as a continuation of the existing porch projection shown above) and the proposed first floor (at the side) would be set back 0.5 metres from the rendered wall on the front elevation. Whilst the main roof would be set down and the first floor set back, it is considered that the proposal would not appear subservient the existing building overall. It is clearly a disproportionate addition.

The proposed first floor (at the front) would have a flat roof and elongate the existing front projection (i.e. the brick faced projection in the image above and outlined on the plan extract below), which would be out of character with the existing roof design and unbalance the appearance of the pair of semi-detached dwellings, of which the application property is a part. It is also contrary to the guidance within the Householder Extensions/Alterations Design Guide.



The proposed first floor (at the rear) would have a large flat roof which would be out of character with the existing roof design and be visually detrimental to the building. Two storey flat roof extensions are not supported by the LPA as they are considered poor design.

The proposal would retain a 0.9 metre wide access to the rear of the property but due to the enclosure of this feature within the proposed extension, there would be little or no visible gap between the side elevation of the application property and the side boundary with no. 80 Snelling Avenue. As such, the proposal would undermine the gap between the existing buildings and the spacious character of the street scene.

The proposed facing materials and fenestration on the front elevation would match with the existing building. However the proposed fenestration on the rear elevation would not be consistent with the existing rear windows and would be out of character with the existing building.

The proposed development would significantly increase the footprint of the building, consolidating and extending the amount of built development at the application site, to a level which would be out of character with the surroundings and disproportionate. Reference to the existing and proposed block plans clearly illustrates that the resulting building would be much larger than any other dwelling in the immediate area;



Overall the proposal, by virtue of its siting, bulk, massing and design, would result in an incongruous and

disproportionate addition, which would not respect the character or appearance of the existing building, would be an overdevelopment of the application site and have an unbalancing impact on the pair of semi-detached properties, of which the application property is a part. As such, the proposal would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, the Householder Extensions/Alterations Design Guide (2021) and Paragraph 130 of the National Planning Policy Framework 2021.

It is noted that the proposed internal layout is unusual and would result in the provision of a second kitchen, with space for a lounge/diner and a 33.8 square metre bedroom. The side extension would have a separate access whilst maintaining the existing front door to the dwelling. Furthermore a small alteration to the bathroom access arrangements and the provision of a second staircase (which there would appear to be space for) would mean that all the facilities for a day to day domestic existence would be available within the proposed extension. Indeed, a local resident has raised concerns that the proposal could be used as a separate dwelling. Had the design concerns outlined above not been overriding, the applicant would have been asked to clarify the intended use of the proposed extension and encouraged to amend the layout to ensure that a future conversion to a separate dwelling was not possible.

Amenity of Future Occupiers

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

The proposed development would provide a bedroom that would be significantly in excess of the minimum size requirements set out in the NDSS and sufficient rear garden area and depth would be retained for a dwelling with four or more bedrooms (194 square metres existing garden area and 146 proposed garden area). As such, the proposal would provide a good standard of living for future occupiers and be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014), the NDSS and the RLG.

Three existing windows in the side elevation of the application property would be lost as a result of the proposed development (two bathroom and one hallway). This would reduce the levels of natural light within these rooms and be detrimental to the living conditions of future occupiers. However as the rooms are all non-habitable, then it is considered that the adverse impact to light would not be so significant as to warrant a refusal of planning permission.

Overall the proposed development would provide a good standard of living for future occupiers and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy 2014, the NDSS and the RLG.

Neighbouring Amenity

Paragraph 130(f) of the NPPF 2021 sets out that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of surrounding occupiers.

The closest residential properties to the application site are nos. 80 and 84 Snelling Avenue (located to the north east and south west respectively). Nos. 69 and 71 Greenhill Road are located to the south east and nos. 25 and 27 Snelling Avenue are located to the north west, across the roadway.

The proposed development would add significant bulk to the northern side of the property and would be located in close proximity to the boundary with no. 80 Snelling Avenue (which is located on lower ground than the application site). No. 80 has four windows in the side elevation that faces the application site (four at ground floor and one at first floor) and the side elevation is set some 1.6 metres away from the site boundary. There are two windows in the south western side of the rear elevation at no. 80 (one at ground

floor and one at first floor).

Due to the orientation and levels difference between the buildings, the close proximity of the proposed development to the side boundary and its overall height and bulk, it is considered that there would be adverse overshadowing and overbearing impacts to the occupiers of no. 80 Snelling Avenue. A section of the two storey side extension has a flat roof which is possibly to reduce the impact on the neighbouring property in terms of light, but this has minimal impact and does not alleviate the impact on the neighbour.

Due to the layout and orientation of the other surrounding properties, there would be no adverse overshadowing or overbearing impacts to any other occupiers.

The proposed development would result in new windows in the front and rear elevations of the application property. There would be privacy distances of at least 28 metres to nos. 25 and 27 Snelling Avenue and some 33 metres to nos. 69 and 71 Greenhill Road. In addition, screening would be provided by boundary treatments. Therefore there would be no adverse overlooking impacts to the occupiers of any surrounding dwellings.

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 elevations of the proposed development.

Overall it is considered that the proposed development, by virtue of its height and proximity to the boundary with no. 80 Snelling Avenue, would be likely to be severely oppressive and overbearing, causing overshadowing and curtailing outlook for the occupants of that dwelling. The proposal is therefore contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 and Paragraph 130(f) of the National Planning Policy Framework (2021).

Parking and Highways

The application property has three bedrooms and the proposed development would result in the property increasing to at least four bedrooms (or even having a second residential unit). At present part of the site frontage is hard surfaced and used for vehicle parking and a garage door provides access to the side garden area, which has sufficient space to accommodate one vehicle. It is noted that the existing frontage parking area has a depth of only 4.5 metres in front of the garage and only 3.9 metres in front of the front door.

The following is an extract from the Kent County Council Residential Dropped Kerb Guidance and Self-Assessment (2022), which sets out the minimum requirements for frontage vehicle parking spaces;

How will you park the car	Width(minimum)	Depth(minimum)
A/ Perpendicular-Parking area at right angles to the road	2.4 metres	4.8 metres
B/ Perpendicular with access Point- Parking area in front of access door or garage	2.4 metres	6 metres
C/ Parallel-Parking area parallel to the road	6 metres	3 metres
D/ Parallel with access point – Parking area to parallel to the road	6 metres	4.2 metres
E/ Separate Entrance and Exit- Driving on and off the parking area	15 metres	4.2 metres

Therefore the existing frontage parking arrangement is below the minimum standard and any vehicles parked on the site frontage are located partially outside the application site (on a verge).

It is noted that planning permission 20070418 was granted for a vehicle access with a maximum width of three metres, at the application site (according to condition 2 of that permission). The existing vehicle access/parking area has a width of some 7.2 metres and therefore is a breach of that condition. However the widened parking area has been in place since at least September 2010 and as such, is immune from enforcement action. Notwithstanding this immunity, it is considered that the existing frontage parking area is of substandard size.

The proposed development would result in the frontage parking area all having a depth of 3.9 metres and the complete loss of the side garden parking area, i.e. there would be no on-site parking provision that meets the appropriate size standards.

The GBC Highways Officer has raised an objection to the proposed development due to the loss of on-site vehicle parking. He states that two parking spaces would be required for a four bedroom property and one space would be required for a one bedroom residential unit.

Overall it is considered that the proposal (whether it be for a single bedroom, multiple bedrooms or a separate residential unit) would make insufficient provision for the parking of cars within the site in accordance with the Borough Council's adopted Vehicle Parking Standards and would be likely to lead to cars parking on the public highway, inconvenient to other road users and detrimental to highway safety. As such, the proposal would be contrary to Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review November 1994.

Any Other Material Planning Considerations

There is a Southern Water sewer at the application site, which could be affected by the proposed development. As such, the comments of Southern Water (as set out above) can be brought to the attention of the applicant in an informative attached to any planning permission granted.

The application site is located within an area of multi-period archaeological potential and Groundwater Source Protection Zone 2. However, as the proposed development is 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 groundwater or archaeology. As such, the proposal would be in line with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located in a smoke control area. As such, advice regarding smokeless fuels/appliances can be given to the applicant in an informative attached to any planning permission granted.

Conclusion & Recommendation

The proposed development would have an incongruous and disproportionate design and not respect the character or appearance of the existing building, it would be detrimental to the visual amenities of the surrounding street scene and the residential amenity of the occupiers of no. 80 Snelling Avenue and would provide insufficient on-site car parking. The positive features of the proposal (that the facing materials and fenestration on the front elevation would match with the existing building, that the proposal would provide good living conditions for future occupiers and that there would be no adverse overlooking impacts) would not overcome these negative aspects and as such, planning permission should be refused.

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

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
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Signed:	K Joyce	Signed:	
Dated:	15th March 2023	Dated:	16 March 2023