



Delegated Report

Application No:	20250518
Location:	Ashleigh 39 Rhododendron Avenue Meopham Gravesend Kent DA13 0TU
Description:	Demolition of chimney to north side elevation. Erection of two storey extensions to front, rear and side of dwelling. Erection of new chimney to south side elevation. Increase in roof ridge height, installation of solar panels and alterations to fenestration.
Applicant:	Michael and Natasha Louth
Site Visit Date:	Desktop Assessment

Submitted Documents/Plans

The application comprises the following documents and plans:

- Drawing no. PL/01 Rev D– Location and Block Plan.
- Drawing no. PL/02 Rev A – Existing Plans.
- Drawing no. PL/03 Rev A – Existing Elevations.
- Drawing no. PL/04 Rev E – Proposed Plans.
- Drawing no. PL/05 Rev E – Proposed Elevations.
- Drawing no. PL/07 Rev C – Block Plan – Shadow and Solar Study.
- Drawing no. PL/08 Rev C – Block Plan – Biodiversity Gain and Landscaping Statement.
- Drawing no. PL/09 Rev C – Block Plan – Sustainable Drainage Statement.
- Drawing no. PL/10 Rev C – Block Plan – External Lighting Statement.
- Drawing no. PL/11 Rev C – Photographic Evidence – Existing Property Condition.
- Planning Statement (22 May 2025).
- Bat Survey Report (2 September 2025)
- Email received on 31.10.25 with and footprint and volume figures

Superseded Documents

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- Drawing no. PL/01 Rev C – Location and Block Plan.
- ~~Drawing no. PL/04 Rev C – Proposed Plans.~~
- ~~Drawing no. PL/05 Rev C – Proposed Elevations.~~

Relevant Planning History

The planning history relating to this site is summarised below:

<u>Application No.</u>	<u>Description</u>	<u>Status</u>	<u>Decision</u>
20010771	Erection of a detached dwelling with 4 bedrooms in roofspace at land adjacent to Ashleigh Rhododendron Avenue Culverstone Kent DA13 0TU	Refused	05.12.2001
19960134	Outline application for the erection of detached bungalow and detached garage and installation of septic tank.	Permitted	23.04.1996

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Courts have held that it is a matter of planning judgement as to whether a proposal is in accordance with the development plan when 'read as a whole' and conflict with a particular policy or policies may not pass that threshold.

Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

In this instance the development plan for Gravesham currently comprises: -

- The Gravesham Local Plan Core Strategy (September 2014);
- Remaining Saved Policies of the Local Plan First Review (1994); and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (2016, revised 2020).

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 and Development Principles.

Saved Policies in the Gravesham Local Plan First Review (November 1994)

- P3 – Vehicle Parking Standards.
- T1 – Impact of Development on Highway Network
- C13 – Extensions to Dwellings in the Countryside.
- TC7 – Other Archaeological Sites.

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 First 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
- Section 13 - Protecting Green Belt land
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020.
- Householder Extensions/Alterations Design Guide Supplementary Planning Document (2021).
- Design for Gravesham – Design Code SPD (2024).
- SPG 4 - KCC Parking Standards (2006).
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Meopham Parish Council

No comments received.

KCC Ecological Advice Service (comments dated 16 July 2025)

SUMMARY: SUFFICIENT INFORMATION RECEIVED

A Preliminary Roost Assessment (PRA) has been completed (Native Ecology, Sept 25) which determined that the onsite building was of moderate potential to support roosting bats, therefore two bat emergence surveys were recommended. No bats were recorded emerging from the building and they are therefore presumed likely absent. Low numbers of bat were recorded foraging in the garden habitat.

We have included suggested informative wording in the chance that bats or nesting birds are encountered during construction.

BATS

Suggested Informative Wording:

There is a risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species Regulations 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or to contact the Bat Advice Service on 0345 1300 228, email enquiries@bats.org.uk or visit the Bat Conservation Trust website.

NESTING BIRDS

Suggested Informative Wording:

All wild birds and their nests are protected from harm under Section 1 of the Wildlife and Countryside Act 1981. As such, any works which may result in impacts to nesting birds should be conducted outside of the core nesting season which is March through August (inclusive) or under ecological supervision. A suitable exclusion zone should be established around any active bird nest in the event one is discovered during works; this exclusion zone should be maintained until all nesting birds have fledged and the nest is unoccupied.

ARTIFICIAL LIGHTING

It is understood that no external lighting is included within the proposals. We advise that an informative is attached to any approved planning permission to remind the applicant that written agreement would need to be sought from the local planning authority prior to any future installation of outside lighting. This is to avoid impacts of artificial lighting on the behaviour of protected and priority species which may inhabit the adjacent tree lines and hedgerows.

BIODIVERSITY NET GAIN – EXEMPT

Having reviewed the proposals we consider this application to be exempt from mandatory biodiversity net gain, so that mandatory biodiversity net gain of 10% will not apply. We consider this application exempt because:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

Additionally, we consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

KCC Ecological Advice Service (comments dated 16 July 2025)

SUMMARY: BAT ROOST ASSESSMENT REQUIRED

The existing structures proposed for demolition/alteration appears to contain potential roost features (PRFs) which may support roosting bats. Bats often roost under tiles, roofing felt and lead flashing, adjacent to windowsills and windowpanes and within cracked brickwork, lifted rendering, weatherboarding, eaves and soffit boxes. Whilst the interior roof spaces appears to be unsuitable for roosting bats, there appear to be a number of PRFs. As these proposals may adversely affect bats, a Preliminary Roost Assessment (PRA) for bats is requested, this will be carried out by a suitably qualified ecologist.

If the PRA identifies roosting bat suitability to be present and impacted by the development, it is likely that further surveys for bats will need to be carried out. The results of the necessary surveys carried out, and details of any mitigation required should be submitted prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/200519, which states “it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”.

Should bats be found to be roosting in the buildings proposed for alteration/demolition, a mitigation licence may be required from Natural England for works to proceed.

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KCC Highways

Referring to the above description, it would appear that this development proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements. If there are any material highway safety concerns that you consider should be brought to the attention of the HA, then please contact us again with your specific concerns for our consideration.

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

Two neighbours consulted and a site notice was placed. The final date to submit comments ended on 26th September. No comments have been received.

Analysis

The application site lies on the western side of Rhododendron Avenue. It comprises a detached dwelling located within a substantial garden area. This site is located within a rural area, the Metropolitan Green Belt and the Harvel Wooded Down Landscape Character Area.

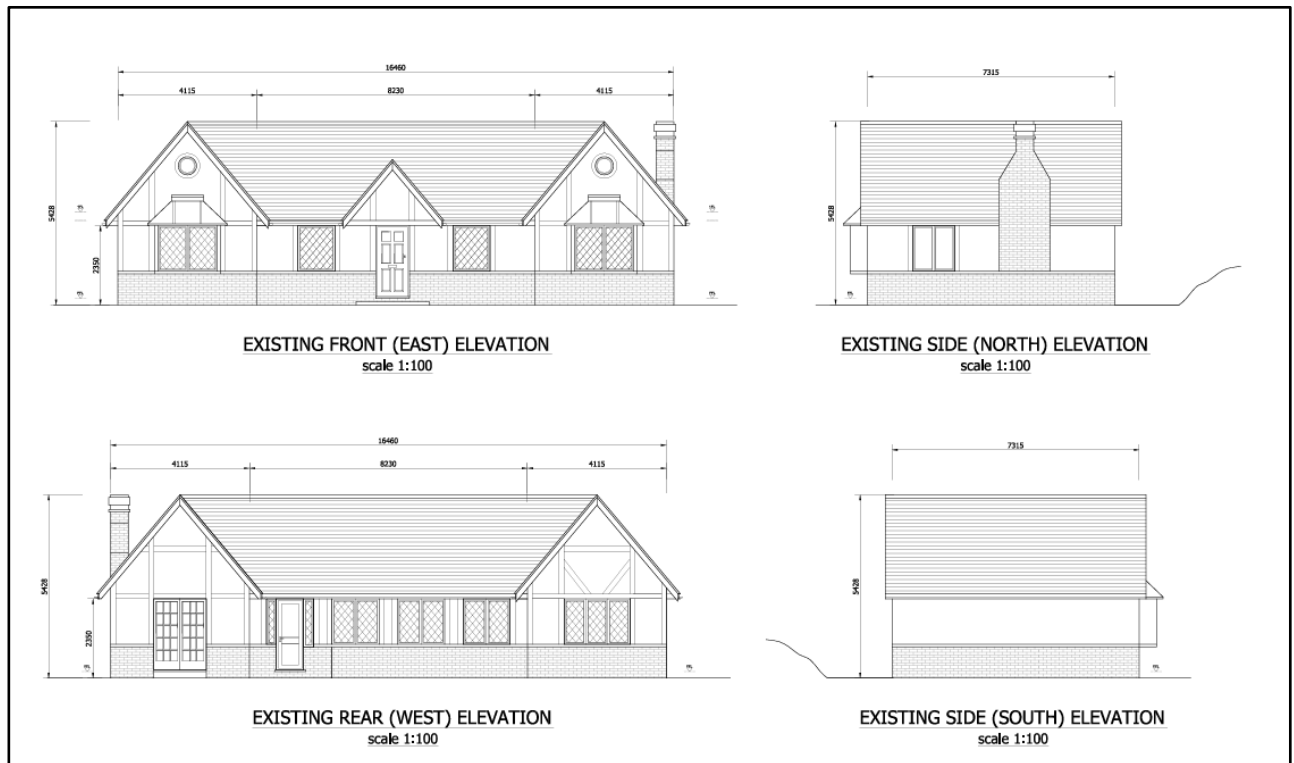
The original property was granted planning permission in April 1996. An extract from the approved drawings is set out below:



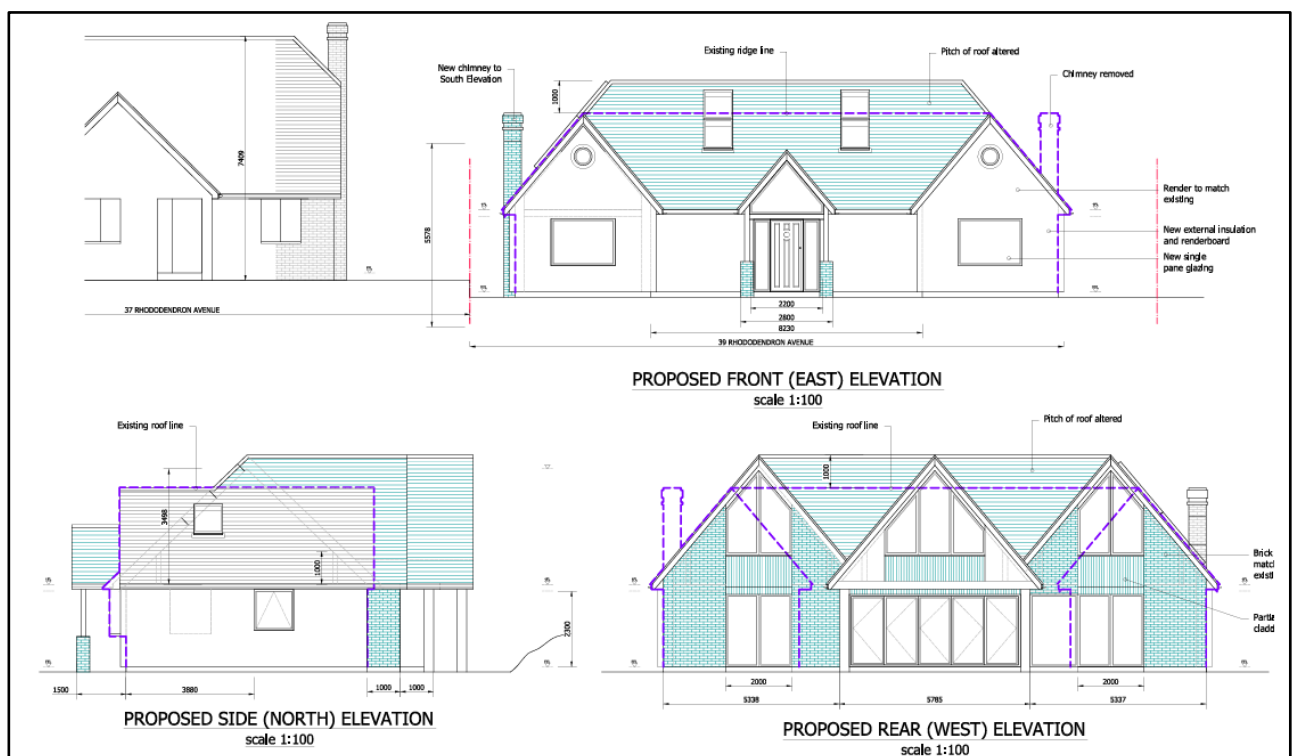
The approved drawings clearly show that the property was a bungalow with no accommodation at first floor level. It would appear that the roofspace has subsequently been converted and is used as additional floorspace. This includes windows and rooflights which were not part of the original approval.

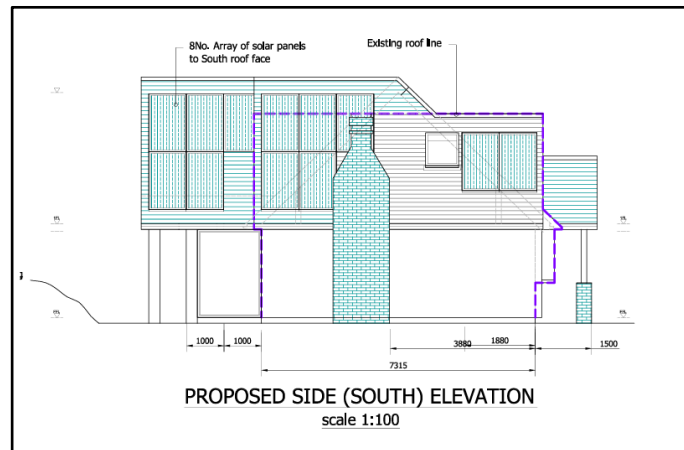
This proposal seeks permission for the erection of extensions predominantly to the front and rear of the dwelling. To the front a single storey extension and a porch would be provided between the two front projecting gables. The proposed extensions to the rear would be two-storey and the ridge height of the roof would be increased by 1.0m. A new chimney would be erected on the southern elevation. The proposal includes the installation of solar panels and alterations to fenestration.

The existing and proposed elevations are shown below:

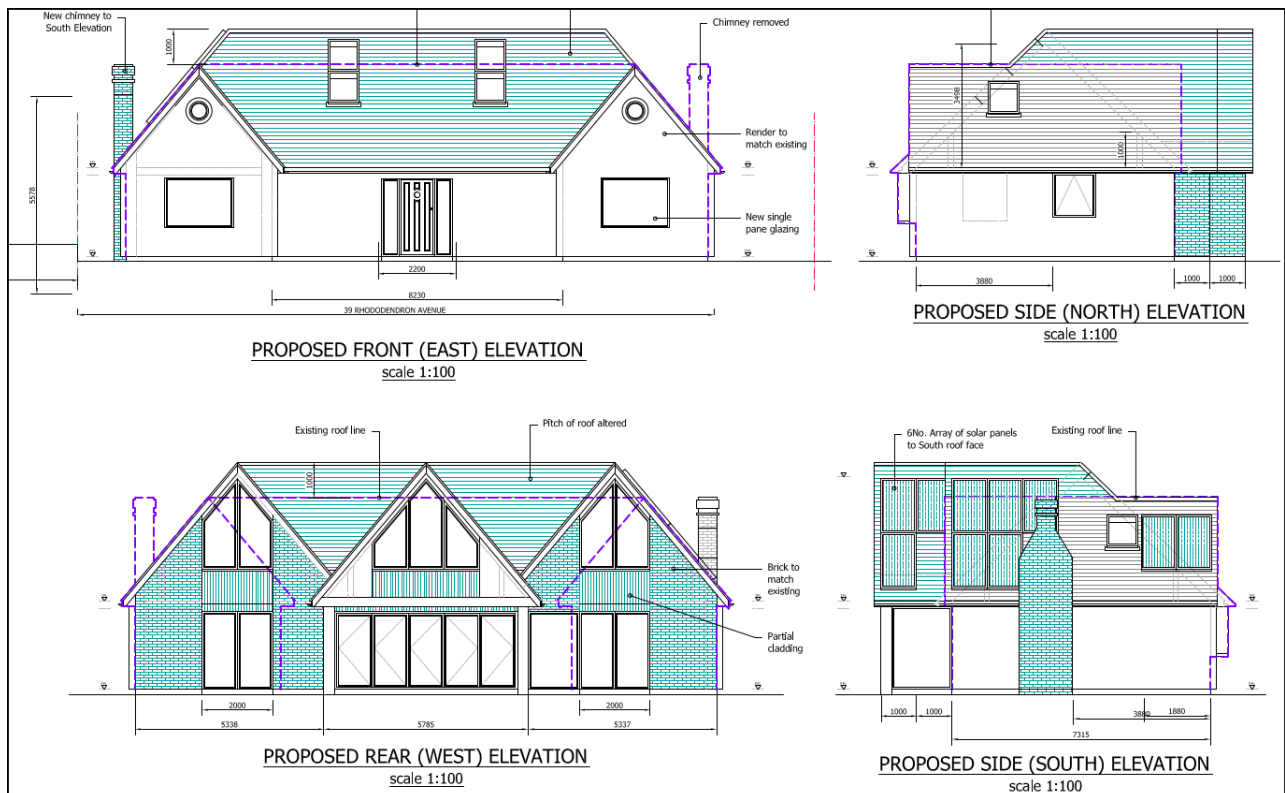


Existing Elevations





Originally Proposed Elevations



Proposed Elevations as Amended

In the consideration of this application, Policy CS02 of the Core Strategy is relevant. Development in the urban area is prioritised as the sustainable location for development. In the rural area, Policy CS02 states that development will be supported within rural settlements that are inset from the Green Belt and defined on the policies map. Development outside those settlements, i.e. in the Green Belt, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.

The application site is located within the Green Belt and outside any rural settlements that are inset from the Green Belt.

The main planning considerations relating to this application are as follows:

1. Is the proposed development appropriate in the Green Belt?
2. The effect of the proposal on the openness of the Green Belt.
3. Design and visual impact.
4. Impact on landscape.
5. Impact on residential amenity.
6. Highway issues.
7. Biodiversity.
8. Very special circumstances.

These issues are assessed below:

Is the proposed development appropriate in the Green Belt?

National policies for protecting the Green Belt are set out in Section 13 of the National Planning Policy Framework (NPPF). Paragraph 153 is particularly relevant in the consideration of planning applications within the Green Belt:

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 154 of the NPPF states development in the Green Belt is inappropriate it comprises one of a number of excepted forms of development, including:

- c) *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

Saved Policy C13 of the Gravesham Local Plan First Review, which relates to extensions to dwellings in the countryside, is also relevant to this determination. It sets out a number of criteria that should be met when considering proposals for domestic extensions. As the policy pre-dates the NPPF, the weight attached to the policy must be considered carefully, with greater weight being given where the approach is consistent with the NPPF.

Policy C13 places an overall limit on extensions of one third of the gross floor area of the original dwelling unless the increased floor space has no overall effect on the existing bulk and appearance of the dwelling (criteria (ii)). It also requires the massing, scale and form of any extension to be appropriate to the existing dwelling and the Green Belt setting (criteria (vi)).

Weight to be given to Policy C13

In the Planning Statement accompanying this application, the applicant's agent claims that Policy C13 is outdated and cannot be afforded any significant weight. In support of this, reference is made to an appeal decision dated relating a refused planning application for extensions at 38 Rhododendron Avenue, Meopham, Gravesend, Kent, DA13 0TT (Gravesham planning reference 20220070). In this decision, the Inspector states the following:

3. *The appeal site is located within the Green Belt and comprises an existing single storey detached dwelling. Saved Local Plan1 Policy C13 relates to extensions to dwellings in the countryside. Criterion 'ii' of this policy limits increases in floorspace to one third of the gross floor area of the original dwelling where there is an overall effect on its bulk. The proposed development would exceed this limit.*

4. *Nonetheless, Saved Policy C13 is not consistent with the Framework, particularly in relation to development in the Green Belt. I accept that numerical restrictions can be helpful as a means to quantify the threshold of harm, in terms of whether a development constitutes disproportionate additions. However, criterion 'ii' only accounts for an increase in floorspace. This is a crude measure when used in isolation. For example, it does not recognise the potential to accommodate additional floors in an existing building in addition to other extensions, as is proposed here.*
5. *Policy C13 includes other criteria which take the mass of the building into account. However, the fact that a development can fail simply on the basis of criterion 'ii' renders these additional considerations irrelevant in such circumstances. As such, this policy does not reflect the more wide ranging scope for alterations allowed under Framework Paragraph 149C, which refers to 'size', a term which encompasses more than simply a comparison of floorspace figures. As such, in considering the application of Policy C13 to development in the Green Belt, the policy is out-of-date and I do not afford the conflict with it any significant weight.*

Notwithstanding this, subsequent appeal decisions have afforded "considerable weight" to Policy C13. For example, in an appeal decision dated 13 February 2024 relating to extensions to a property at 42 Beechwood Drive, Meopham, Gravesend, Kent DA13 0TX (Gravesham planning reference 20230250), the Planning Inspector provided the following conclusion:

The GLPFR pre-dates the Framework's publication and, through applying restraint upon development in the Green Belt, Saved Policy C13 appears broadly consistent with the Framework and thus should be afforded considerable weight.

It is acknowledged that the restriction in floor area referred to in Policy C13(ii), when considered in isolation, does not fully reflect the more wide-ranging scope for alterations allowed under paragraph 154(c) of the NPPF, which refers to 'size'. Size is a term which refers to more than floorspace and can reasonably be taken to include such factors as volume, height, external dimensions and visual perception.

Notwithstanding this, it should be noted that Policy C13 (vi) requires the massing, scale and form of any extension to be appropriate to the existing dwelling and the Green Belt setting. These factors are also relevant in determining whether the size of an extension is proportionate in relation to the original building as they require looking at size in the round. These aspects of the policy, combined with the restriction relating to floor area, therefore provide an appropriate indicator as to whether extensions would result in disproportionate additions over and above the size of the original building. They are broadly in line with the NPPF and should therefore be afforded weight.

Increase in size of the dwelling

The application is accompanied by calculations comparing the gross external area and volume of the original dwelling with that of the extended dwelling. These are set out below:

Original Proposal figures

	Original	Proposed	Percentage Increase
1. GIA (m ²)*	77.9	197.2	153%
2. GIA (m ²)*	131.8	197.2	49.6%
GEA (m ²)	92	138	50%
Volume (m ³)	411.52	684.96	66.4%

Amended Proposal figures

	Original	Proposed	Percentage Increase
1. GIA (m ²)*	77.9	163.8	110.3%
2. GIA (m ²)*	131.8	163.8	24.3%
GEA (m ²)	92.8	137.7	48.4%
Volume (m ³)	411.52	667.29	62.2%

*In the table above, two sets of figures are provided for GIA. The original dwelling as approved had a total floor area of 77.9m². The first GIA figure therefore shows the increase in floor area compared to the floor area of the original dwelling. The roof space was converted at a later date and has a floor area of 53.9m². This did not involve any extensions or additions to the property. The second GIA figure therefore shows the increase in floor area if the converted first floor area is included within the figures relating to the original dwelling.

Both sets of figures relating to GIA demonstrate that the proposed extensions would result in an increase that would exceed the one third limitation set by Policy C13(ii) of the Local Plan First Review. The increase would be 110.3% (based on the total floor area of the original dwelling) or 24.3% (based on the total floor area of the existing dwelling, incorporating floorspace at first floor level). This confirms that using the first set of figures, the restriction in floor area referred to in Policy C13(ii) would not be met but it would be met if using the second set of figures, which incorporates the converted roofspace. Plus, the scheme as amended would result in removal of the garage, those reducing the overall built footprint on the site further. Conditions would need to be applied restricting permitted development rights and to ensure the garage is removed.

The submitted Planning Statement refers to three cases where the requirements of Policy C13(ii) were not met and planning permission was still granted. These are discussed briefly below:

- Gravesham planning reference 20220785: Valley Side 53 Rhododendron Avenue Meopham Gravesend

With this proposal, the approved increase in floor area was 36.35%. The size of the proposed extensions was justified in the delegated officer report as follows:

Whilst the proposed extensions are slightly outside the one third limit increase over the original dwelling, it is only marginally and overall they have been designed to reflect the existing dwelling and incorporate features of the original property and are considered to be subservient to the original build. Furthermore, the external footprint of the proposal would not increase from the previously approved scheme.

- Gravesham planning reference 20240427: Two Trees Rhododendron Avenue Meopham Gravesend

With this proposal, the approved increase in floor area was 223%. The size of the proposed extensions was justified in the delegated officer report as follows:

The cumulative increase in floor area proposed would be in excess of the one third limit set out in Saved Policy C13 of the Gravesham Local Plan First Review November 1994. However, it is noted that a significant proportion of the existing increased floor area is in the roof of the property did not add to the external size/volume of the building (as it was within the existing roof space). Furthermore, the proposed increase to the footprint of

the dwelling resulting from this application, would only be some 55 square metres or 59% above the original. Lastly, the proposed dormer extension would only add around 16 cubic metres of volume to the roof. Therefore while it is acknowledged that the property has been extended significantly from its original form, the alterations proposed as part of this application are relatively modest and limited to the footprint, bulk and massing, such that a refusal is not considered defensible at appeal.

Importantly, the proposed increase in bulk and massing would be located at the rear of the building and would be seen in the context of the existing large rear gable. In addition, the proposed removal of an outbuilding located on the northern side of the building would reduce the impression of built development across the plot, by narrowing the built form.

- Gravesham planning reference 20210227: Poplars 99 Rhododendron Avenue Meopham Gravesend.

With this proposal, the approved increase in floor area was 50%. The size of the proposed extensions was justified in the delegated officer report as follows:

The proposed extensions are not excessive in size and are not considered to be of a disproportionate size in comparison to the host dwelling. As such the proposal is considered acceptable and complies with Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 (GLPFR) and paragraph 145 of the NPPF (2019).

It is considered that the Council's approach to the assessment of each of the applications referred to in the Planning Statement has been consistent and in line with the approach set out above under the sub-heading "Weight to be given to Policy C13". In each of these cases, the restriction in floor area referred to in Policy C13(ii) has been an indicator as to whether a proposed extension(s) would result in disproportionate additions over and above the size of the original building, but has not the sole determinant.

Although, the NPPF does not define the size of development that would comprise disproportionate additions, it is evident that the proposal as originally submitted would result in a substantial increase in the size of the dwelling when compared to the relatively modest original bungalow. This is evidenced from the extracts from the submitted drawings which appear earlier in this report. In particular, the increase in height of the roof combined with the introduction of a significant gable addition and the extension of the existing two gable projections to the rear would add significant bulk to the building. Indeed, the original dwelling would be dwarfed by these extensions. As a matter of judgement, it must be concluded that the overall size of the building as originally proposed cannot reasonably be considered to result in anything but disproportionate additions over and above the size of the original building. However, following discussions with the planning agent, the scheme has been amended. The front and rear elements of the proposed extensions have been significantly reduced to a degree which would result in visually, a reasonably sized extension which would not be significantly over and above the size of the original dwellinghouse.

For these reasons it is considered that this proposal would constitute appropriate development in the Green Belt.

The effect of the proposal on the openness of the Green Belt

Paragraph 142 of the NPPF relates to the openness of the Green Belt:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Planning Practice Guidance on Green Belts states that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

This proposal would not introduce significant additional built development to the site in terms of footprint, volume and height. This is evidenced from the proposed elevations and floor plans.

It is considered that the size and visual impact of the proposed extensions would NOT result in substantial harm to the openness of the Green Belt. The negative effect on the openness of the Green Belt would conflict with the aims of Green Belt policy as set out in paragraph 142 of the NPPF.

Design and visual impact

Section 12 of the NPPF relates to “achieving well-designed places” and sets out the Government’s requirements in relation to design issues. Paragraph 131 is particularly relevant:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The aims set out in paragraph 131 of the NPPF are reflected in Policy CS19 of the Core Strategy. This requires new development to be “visually attractive, fit for purpose and locally distinctive” and to “conserve and enhance the character of the local built, historic and natural environment”. It also requires new development to “integrate well with the surrounding local area”. In addition, Policy CS19 requires the following:

“....the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings.”

Design for Gravesham (2024) expands on the Core Strategy, and Policy CS19 in particular, to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

The Council’s Householder Extensions/Alterations Design Guide Supplementary Planning Document (SPD) provides design guidance on extensions and alterations and requires that any such proposals “should respect the original character of the existing dwelling, complement and correspond with the character of neighbouring properties and the local area”.

It is acknowledged that the proposal seeks to complement the design of the original dwelling. The existing rear gable projections would be enlarged and a further gable extension provided which would provide a symmetry to the rear elevation. However, the main concern in terms of the design and visual impact of the proposal relates to scale of the extensions. Paragraph 9.2 of the Council's adopted Householder Extensions/Alterations Design Guide contains the following requirement:

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.

The scheme as reduced would not dominate the host property. These extensions would be subordinate to the original dwelling and in this respect would meet the requirements of paragraph 9.2 of the Council's adopted Householder Extensions/Alterations Design Guide.

In light of the above analysis, it is considered that the proposal would meet the tests set out in the NPPF, Policy CS19 of the Core Strategy, Design for Gravesham and the Householder Alterations/Extensions Design Guide SPD.

Impact on landscape

Section 15 of the NPPF highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Policy CS12 of Gravesham Local Plan Core Strategy states that the overall landscape character and valued landscapes within the Borough will be conserved, restored and enhanced and that proposals will take account of the Gravesham Landscape Character Assessment.

The site is located within the Harvel Wooded Downs Character Area. The key characteristics are defined in the Gravesham Landscape Character Assessment as follows:

- *Varied topography with steep valley sides and plateaux*
- *Ancient woodland, chestnut coppice and small paddocks and pasture*
- *Traditional historic settlement of Harvel set around village green*
- *Occasional traditional farmsteads*
- *Haphazard mosaic of residential plots and small holdings set within the woodland*

The Gravesham Landscape Character Assessment states that the strong landscape elements within the Harvel Wooded Downs should be conserved, whilst design standards should be defined to halt the erosion of the area with inappropriate development.

Given that the proposal relates to the extension of an existing dwelling and that the bulk of the additional development would be located to the rear of the property, it is considered that it would not conflict with any of the key characteristics of the Gravesham Landscape Character Assessment. As such, it would meet the tests set out in Policy CS12 of the Core Strategy.

Impact on residential amenity

Paragraph 135 of the NPPF requires planning decisions to, *inter alia*, provide "a high standard of amenity for existing and future users". In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to "safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land".

In terms of privacy the main aspect of the windows within the proposed extensions would be towards the front and rear of the property. As these views would be towards the highway to the

front and garden area to the rear, these windows would not result in window-to-window overlooking or the loss of privacy to neighbouring garden areas.

Due to the siting of the dwelling and the separation distance between the proposed extensions and the neighbouring residential properties to the north and south, it is considered there would not be a detrimental impact on neighbouring occupiers in terms of loss of sunlight/daylight or outlook.

In light of these considerations, the proposed extensions would not have a detrimental impact on the residential amenity of neighbouring occupiers and would meet the tests set out in the NPPF and Policy CS19 of the Core Strategy.

Highway issues

Policy CS11 of the Core Strategy seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is provided in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. Saved Policy P3 of the Gravesham Local Plan First Review requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

The property currently benefits from a double garage with a large area of on-site parking to the front of the dwelling. The proposal would not result in an increase in the number of bedrooms provided within the dwelling. As such there would be no requirement for additional on-site parking to be provided.

In light of the above it is considered that this proposal would be acceptable in terms of highway safety.

Biodiversity

Paragraph 180 of the NPPF (2024) relates to biodiversity and states that, *inter alia*, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Policy CS12 of the Core Strategy reflects this stance and requires there will be no net loss of biodiversity in the Borough.

The application is accompanied by a Preliminary Roost Assessment (PRA) and no bats were recorded emerging from the building. The KCC Ecological Advice Service has been consulted and raised no objection subject to an informative relating to bats or nesting birds that may be encountered during construction.

The KCC Ecological Advice Service has also confirmed that the application is exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Conclusion

For the reasons set out in this report, this development would result in proportional additions comparative to the size of the original building” and as such would constitute appropriate development in the Green Belt. Nor, would the proposal result in substantial harm to the openness of the Green Belt. This would comply with the aims of Green Belt policy as set out in paragraph 142 of the NPPF.

In addition, the proposed extensions would be subordinate to the original dwelling but would dominate the host property. In this respect they would meet the tests set out in the NPPF, Policy CS19 of the Core Strategy, Design for Gravesham and the Householder Alterations/Extensions Design Guide SPD.

The scheme would not conflict with any of the key characteristics of the Gravesham Landscape Character Assessment. As such, it would meet the tests set out in Policy CS12 of the Core Strategy.

The proposed extensions would not have a detrimental impact on the residential amenity of neighbouring occupiers and would meet the tests set out in the NPPF and Policy CS19 of the Core Strategy.

Adequate vehicle and cycle parking provision is therefore available in accordance with paragraphs 109 to 114 of the National Planning Policy Framework (2024), Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014 subject to further details of cycle parking provision.

The proposed development would not raise any concerns regarding potential impact to bats. Nor would the scheme be subject to the Biodiversity Net Gain requirement.

Recommendation:

The recommendation is to approved the development.

See draft Decision

Case Officer: Lisa Fisher	Team Leader: Richard Hart
Signed: 	Signed: R Hart
Dated: 14th November 2025	Dated: 18 th November 2025