



Delegated Report

Householder Planning Application

Planning Application No: 20231334

Location: Ashlea Horns Oak Road Meopham Gravesend

Description: Demolition of existing garden room, carport and enclosed porch; erection of new pitched roof incorporating front and rear gable features to replace existing dormers, pitched roof to replace existing flat roof on western side and rear balcony; erection of single storey rear extension; enlargement of first floor habitable area; alterations to internal layout; and formation of car parking and turning area at front.

Applicant: Mrs Harleen Mattu

Site Visit Date: 03 May 2023

Submitted Documents/Plans

Householder Application for Planning Permission form;
Drawing no. 3445 – 013 Rev. A Site location plan, existing and proposed block plans;
Drawing no. 3445 – 009 Rev. B Existing layouts and elevations;
Drawing no. 3445 – 012 Rev. B Proposed layouts and elevations and street scene;
Covering letter dated 28 December 2023;
Design and Access Statement December 2023; and
Email from agent received 08 January 2024.

Superseded Documents/Plans

Drawing no. 3445 – 009 Rev. A Existing layouts and elevations; and
Drawing no. 3445 – 013 Site location plan and proposed block plan.

Relevant Planning History

Reference	Description	Decision	Decision Date
20230659	Erection of a single storey rear extension.	Certificate Refused	03.08.2023
20230365	Erection of part single storey and part two storey rear extension; erection of new pitched roof incorporating two gables in the rear roof slope and two dormers and a gable in the front roof slope; erection of single storey front extension; demolition of rear outbuilding and formation of two vehicle parking spaces in the front garden.	Refused	01.06.2023
19800181	Erection of single storey rear extension to form utility room and enlarged kitchen erection of front porch	Permitted	12.05.1980
19760385	Formation of bathroom and bedroom extension in existing roof space and erection of extension at first floor	Permitted	13.08.1976

	level to form two additional bedrooms		
19550165	Erection of a detached bungalow (TH/6/55/143A)	Permitted	08.08.1956
19550164	Erection of a detached bungalow (TH/6/55/143A)	Permitted	24.08.1955

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
- C13 – Extensions to dwellings in the countryside
- TC7 – Other Archaeological Sites

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving well-designed and beautiful places
- Section 13 – Protecting Green Belt land
- Section 15 – Conserving and Enhancing the Natural Environment
- Section 16 – Conserving and Enhancing the Historic Environment
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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)
- Gravesham Landscape Character Assessment (2009)
- Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026
- Regulation 18 (Stage 2) Development Management Policies Document (2020)

Consultations, Publicity and Representations

GBC Highways Officer

I have no objections, two car parking spaces remain and there is a reduction in bedrooms, so no additional cycle parking is required. There are no proposed alterations to the access.

KCC Biodiversity Officer

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us (including aerial photos and biological records) and the information submitted, we advise that we are satisfied that there is no requirement for an ecological survey to be carried out.

We have taken this view because Google Street View shows that the building to be converted is in good condition limiting opportunities for gaps/cracks to be present which would support roosting bats. There will be little change to the building footprint which already exists on hardstanding and holds a low ecological value. We are satisfied from the small-scale works proposed that the nearby local wildlife sites will not be impacted.

Bat lightings

Lighting can negatively impact nocturnal species, like bats, that could be foraging and commuting on site and in the surrounding habitat. Currently there is no lighting plan or information submitted. Therefore, if bats are present foraging/commuting within the area, there is a risk that any lighting may have a negative impact.

To mitigate against potential adverse effects on bats, and in accordance with the National Planning Policy Framework 2023, we suggest that the Bat Conservation Trust's 'Guidance Note 08/23: Bats and Artificial Lighting at night' is consulted in the lighting design of the development. We advise that the incorporation of sensitive lighting design for bats is submitted to the local planning authority and secured via an attached condition with any planning permission.

Lighting - Suggested Wording:

Prior to occupation, a lighting plan demonstrating it has been designed to avoid impacts on roosting, foraging, and commuting bats will be submitted to, and approved in writing by, the local planning authority. The lighting will be designed to follow the recommendations within the Bat Conservation Trust's 'Guidance Note 08/23: Bats and Artificial Lighting at night' and the plan will confirm the type and locations of external lighting. All external lighting will be installed in accordance with the specifications and locations set out in the plan and will be maintained thereafter.

Ecological Enhancements

One of the principles of the National Planning Policy Framework is that "opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".

We note that the site has a hedgerow consisting of large trees on the eastern side of the boundary that have the potential for breeding birds to be nesting in. The Design and Access statement says that there are already native wildflowers to the rear of the garden to benefit birds and other species on the applicant's land. We recommend that enhancements for (nesting) birds are incorporated into the site, such as bird boxes to support the local populations, along with integrated bat bricks/boxes into the proposed development itself. We advise that this should be conditioned if planning permission is granted.

Ecological Enhancement Condition – Suggested Wording

Within six months of works commencement a plan detailing how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include the installation of bat and bird bricks/boxes. The approved measures will be implemented and retained thereafter.

Kent Downs National Landscape Unit

No response received.

Meopham Parish Council

No response received.

Neighbouring properties

The application was publicised by a site notice and to two neighbouring properties by letter. No representations have been received. The overall consultation period expired in 09 February 2024.

Officer's Analysis

Background

In June 2023, planning permission was refused for the erection of a part single storey and a part two storey rear extension; the erection of a new pitched roof incorporating two gables in the rear roof slope and two dormers and a gable in the front roof slope; the erection of a single storey front extension; the demolition of a rear outbuilding and the formation of two vehicle parking spaces in the front garden at the application site (reference 20230365).

The ground of refusal was;

1. The proposal, by virtue of its proposed size, scale, massing and form, would be inappropriate development in the Green Belt, as it would result in disproportionate additions over and above the size of the original dwelling and harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal would be contrary to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 of the Gravesham Local Plan First Review and to Section 13 of the National Planning Policy Framework 2021.

Following this refusal, pre-application advice (reference PRE20230260) was sought. The pre-application proposal included alterations to the building incorporating a single storey rear extension and a first floor extension within a pitched roof including six dormers. The Borough Council's response set out that the proposed development would consolidate and extend the amount of built development at the application site to an unacceptable level and that the proposed development would result in disproportionate additions above the size of the original building, which would be detrimental to the openness of the Green Belt and would be inappropriate development in the Green Belt.

Green Belt

The application site lies within the Green Belt. Policy CS02 of the Gravesham Local Plan Core Strategy (September 2014) prioritises development in the urban area as a sustainable location for development. In the rural area it 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 (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.

Therefore, the principle issues in the determination of this application are;

- Is the proposed development appropriate in the Green Belt?
- Effect on the openness of the Green Belt
- Effect on the character and appearance of the area - including landscape character
- Other matters
- Very Special Circumstances

Is the proposed development appropriate in the Green Belt?

Paragraph 142 of the National Planning Policy Framework 2023 (NPPF 2023) sets out that the essential characteristics of Green Belts are their openness and permanence and paragraph 143 lists the five purposes that the Green Belt serves. At the application site, the Green Belt assists in safeguarding the countryside from encroachment. Paragraph 152 of the NPPF 2023 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 154 of the NPPF 2023 states that the construction of new buildings should be regarded as inappropriate development in the Green Belt but it lists certain exceptions. These exceptions are set out in sub-paragraphs 154(a) to 154(g). Sub-paragraph 154(c) identifies 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 (November 1994) relates to extensions to dwellings in the countryside. It sets out a number of criteria that should be met when considering proposals for domestic extensions. As the policy pre-dates the NPPF 2023, the weight attached to the policy must be considered carefully; with greater weight being given where the approach is consistent with paragraph 154 of the NPPF 2023.

In particular Saved 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)). It is considered that these factors are relevant in determining whether the size of an extension is proportionate and as such, these aspects of the policy are broadly in line with the NPPF 2023 and should be afforded weight.

Regard should also be had to an emerging policy in the Regulation 18 (Stage 2) Development Management Policies Document (2020), Proposed Policy GB 5 Extensions, Replacement Buildings and Ancillary Development in the Green Belt. In relation to extensions, this policy reads as follows;

Proposed Policy GB 5 Extensions, Replacement Buildings and Ancillary Development in the Green Belt

Extensions

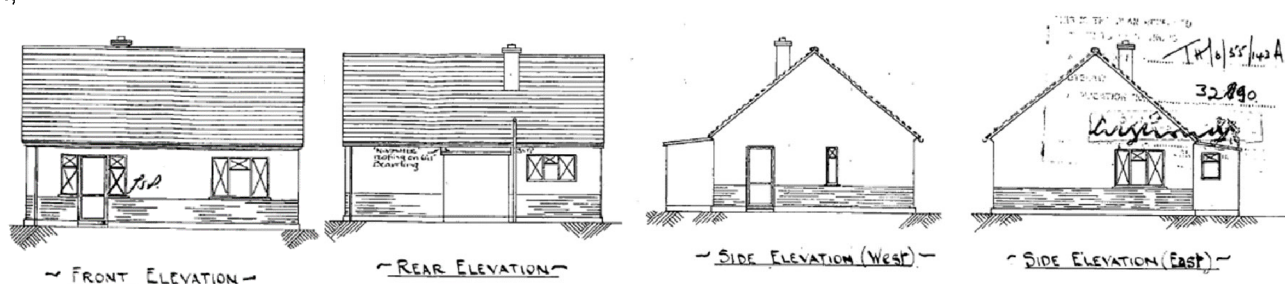
3.6.12. Proposals for the extension of an original buildingⁱ in the Green Belt will only be permitted where the extension will not result in disproportionate additions over and above the size of the original building unless justified by very special circumstances that clearly outweigh harm to the Green Belt and any other harm. The following will be taken into account in determining whether the proposal is proportionate:

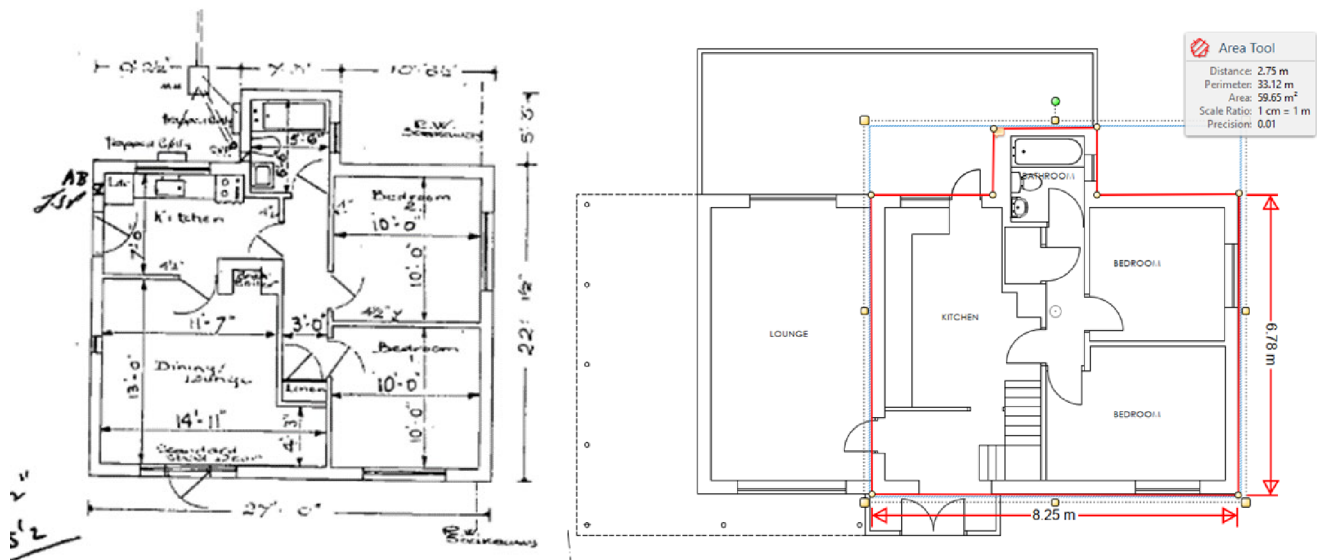
- its footprint, floorspaceⁱⁱ and volume compared to the original building;ⁱ and
- whether its scale, mass and height is subservient to the original building;ⁱ

3.6.13. In addition to the above, Core Strategy Policy CS19 will be applied to determine whether the design of any proposed extension is appropriate, having regard to the presence of any existing extensions and outbuildings, prominence and visual impact of the proposal.

It is noted that as an emerging policy, the weight attached to it is very limited but it does illustrate the Borough Council's intended approach to the assessment of green belt extensions.

The original building, for the purposes of assessing whether the proposed development is a disproportionate addition or not, was granted outline planning permission in September 1955 (TH/6/55/143) and the details were approved in August 1956 (TH/6/55/143A). The following are extracts from the approved plans for TH/6/55/143A and an annotated version of the submitted existing ground floor layout plan;





The original building had a floor area of 60 square metres, a height of 5.7 metres and was a modest bungalow with a simple pitched and gable ended roof and a rectangular footprint.

Although planning permissions were granted at the application site in 1976 and 1980, these do not appear to have been implemented. However, the submitted plans for 19760385 show that sometime before their submission, the building had been extended to provide a lounge, conservatory, porch, car port (front/side open area under canopy) and with front and rear dormers. Appendix 1 contains details of planning permissions 19760385 and 19800181 for reference.

The additions to the original building have provided 95 square metres of new floor space and represent a 158% increase above the size of the original building. It should be noted that, as the car port area is open, it does not provide habitable floor space and as such, it has not been included in the 95 square metre floor space figure;



It is considered that the existing additions to the dwelling, although significant, have essentially retained the original bungalow appearance of the building (albeit with rooms in the roof space).

The current dwelling has a total floor area of 155 square metres and a height of 5.7 metres. It is a bungalow with habitable accommodation in the roof space, with ground floor extensions to the rear and side and an open, car port structure also to the side. The main roof is pitched with gable ends and has front and rear dormers. There are large areas of flat roof on the rear and side of the building. The current dwelling represents a significant enlargement of the original bungalow, which has increased both the floor area and the volume of the building.

The proposed development would add a new roof to the building incorporating front and rear gables and gable ends at either side. There would be a single storey rear extension with a flat roof and an open porch

area at the front. The proposal would result in the building having a floor area of 172 square metres and a height of 7.3 metres. The increase in floor area above the original building would be 112 square metres or 187% and the increase in floor area above the existing building would be 17 square metres or 11%.

As a general rule (and in line with Saved Policy C13 of the Gravesham Local Plan Core Strategy (2014)), the Borough Council considers that extensions which exceed the overall floor area of an original building by one third (33%) or more, are likely to be disproportionate additions. However, it is acknowledged that floorspace is only one measure of such impact and in coming to a conclusion on this issue, the Council has regard to a range of other factors including footprint, floorspace, volume, scale, mass and height (in line with Proposed Policy GB 5 of the Regulation 18 (Stage 2) Development Management Policies Document (2020)).

The cumulative increase in floor area proposed would be significantly in excess of the one third limit set out in Saved Policy C13 of the Gravesham Local Plan First Review November 1994. In terms of bulk and massing, it is considered that the proposed development would add significantly to the appearance of the building. The first floor of the building would be elongated and the roof would be taller and bulkier. The building would have an overall height of some 7.3 metres, which when compared to the original roof height of 5.7 metres is a significant increase. A comparison of the existing and proposed elevations illustrates how the volume, scale, mass and height of the building would increase;



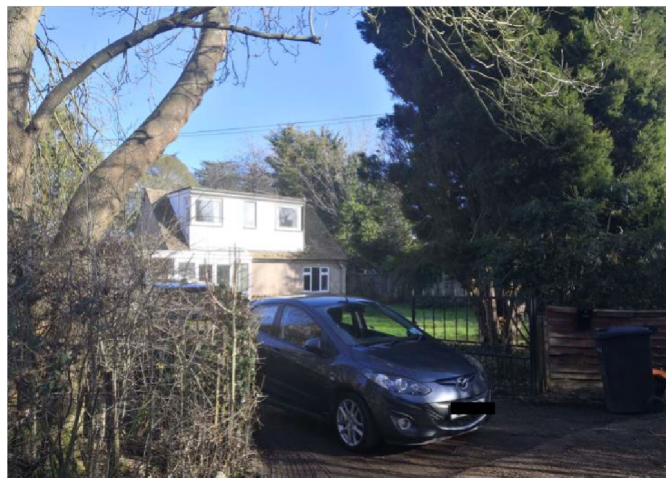
It is noted that the proposed front gable would be a dominant feature, which would not add habitable floor area but would add significant bulk and mass to the front of the building;



Furthermore, the proposed pitched roof above the existing flat roofed lounge extension would not add habitable floor area but would add significant bulk and mass to the side of the building. It would appear that some of the roof space in this area would have sufficient head height to allow it to be used to further increase the floor area of the dwelling in future.

It is noted that the proposed development would include the removal of the existing car port area (24 square metres area). The car port removal would reduce the width of the dwelling and increase open space around the building within the plot, which would be a positive feature. However, as the car port is only single storey and open in character, this benefit would not offset the significant proposed increase in size and bulk of the proposed dwelling overall.

It should also be noted that a new car parking and turning area would be formed at the front of the application site and an existing rear outbuilding (of some 33 square metres floor area) would be retained. An existing driveway is largely unsurfaced (although it is noted that the applicant states that it is tarmac) and provides space for three vehicles to park without turning.



The proposed hardstanding would be surfaced with tarmac and provide two parking spaces with a turning area. Whilst it would be preferable in terms of openness and visually in this rural location, for the proposed hardstanding to be surfaced in an alternative material, such as gravel or grasscrete, it is considered that because the extent of the hard surface would not be excessive and because the front garden has large areas of grass and vegetation, which would soften the built form, then the proposed hardstanding would cause no significant adverse impacts to the Green Belt.

Whilst it is noted that the design of the proposal has been amended since the previous refusal (reference 20230365) and that the revised design has reduced the overall size and bulk of the proposed building, it is considered that the amended proposal has not sufficiently mitigated the harm caused by the proposed increase to the openness of the Green Belt.

Overall, by virtue of an assessment of floorspace, volume, scale, bulk, massing and design, it is considered that the proposed development would result in disproportionate additions over and above the size of the original building. As such, the proposal would be inappropriate development, which would be harmful to the openness of the Green Belt and contrary to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 of the Gravesham Local Plan First Review and paragraph 154(c) of the NPPF 2023.

Effect on the openness of the Green Belt

Paragraph 142 of the NPPF 2023 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence.

The development, by its nature, would involve a form of inappropriate development that would erode the openness of the Green Belt. The proposal would result in building which would be significantly larger and bulkier than the original dwelling and indeed the existing dwelling, consolidating and extending the level of built development at the application site, encroaching over the countryside and undermining openness. Whilst the site is partially screened by mature vegetation, the proposed building would be visible from the site entrance on Horns Oak Road (as highlighted in the above images). Therefore, the proposal would be both spatially and visually detrimental to the openness of the Green Belt.

Overall, the proposed development would significantly and harmfully impact upon the openness of the application site and the Green Belt within which it sits. Furthermore, it would undermine one of the five purposes the Green Belt serves, namely to assist in safeguarding the countryside from encroachment. As such, the proposal would be contrary to paragraphs 142 and 143(c) of the NPPF 2023.

Effect on the character and appearance of the area

The application site is located in the Kent Downs National Landscape (formerly known as an Area of Outstanding Natural Beauty) and the Harvel Wooded Downs Landscape Character Area (LCA) and as such, Policy CS12 of the Local Plan Core Strategy is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Kent Downs AONB Management Plan (now known as the Kent Downs National Landscape Management Plan) and the Gravesham Landscape Character Assessment will be taken into account in determining applications.

The Kent Downs National Landscape Management Plan is essentially about conserving and enhancing the natural beauty of the Kent Downs National Landscape (page 16). It sets out that the local character, qualities, distinctiveness and natural resources of the Kent Downs National Landscape will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development (Principle SD2). That development should conserve and enhance the character and qualities of the Kent Downs National Landscape rather than detracting from it (Principle SD3). That new proposals should conserve and enhance tranquillity and where possible dark night skies (Principle SD7). Furthermore, the Plan will ensure that proposals do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs National Landscape (Principle SD8).

According to the Gravesham Landscape Character Assessment, the Harvel Wooded Downs LCA is characterised by varied topography with steep valley sides and plateaux. Ancient woodland, chestnut coppice and small paddocks and pastures can be found. Views both within and out of the character area are limited because of the combined effect of topography and the heavily wooded character of the landscape.

It is noted that there would be no loss of vegetation and that the residential nature of the application site would be retained. The proposed development would result in a significant increase in the size and bulk of the application property, which would consolidate and extend the level of built development on the plot and in the wider area. However, the alterations would not be harmful to overall landscape quality. Therefore, it is considered that the proposed development would not be detrimental to landscape character.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. In particular, the design of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene and the character of the area.

The area surrounding the application site has a variety of dwellings in different types and styles. Located immediately to the west, is a two storey dwelling and immediately to the east, is a bungalow with habitable accommodation in the roof. Surrounding properties have been subject to numerous extensions and alterations. The existing building has a mixture of external facing materials and has been extended in a piecemeal fashion, which has resulted in a dwelling with an uninspiring appearance.

The design of the proposed development would be modern and the proposed external facing materials would add interest and texture. Whilst out of character with the existing building, the proposal would not look out of place in its surroundings, as it would have a similar height to the neighbouring buildings and the design approach would result in a more consolidated and regular building shape. As such, the proposed design has a number of positive features.

The proposed development would result in a significant increase in the size and bulk of the application property. However, the changed appearance of the dwelling would not be harmful to the character of the street scene.

The proposal has been designed with recessed upper windows and includes the use of modern LED controlled directional lighting, which would control light spillage. In order to ensure the details of the proposal are satisfactory, a condition can be attached to require the submission and approval of proposed external lighting.

Overall, it is considered that the proposed development would not be detrimental to the character or appearance of the surrounding street scene or landscape and would be in line with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (September 2014) and the Kent Downs National Landscape Management Plan.

Other matters

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 and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The proposed development would provide good living conditions for future occupiers (with a total floor area and bedroom sizes that comply with the Nationally Described Space Standards 2015) and sufficient garden would be retained to comply with the Borough Council's Residential Layout Guidelines 2020.

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

Overall, the proposal would not be detrimental to residential amenity and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, the Nationally Described Space Standards 2015 and the Residential Layout Guidelines 2020.

Neighbouring Amenity

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 neighbouring occupiers and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

The closest residential properties to the application site are Parsley Cottage, Horns Oak Road (located to the west) and Beam End, Horns Oak Road (located to the east). Agricultural land is located to the north and south.

The proposed development would introduce a rear balcony and a number of new windows to the application property, including a ground floor bedroom window in the side elevation facing Beam End.

Due to the design of the proposed development, to the screening provided by boundary treatments and vegetation and to the location, layout and orientation of the surrounding properties, there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of the surroundings 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 at first floor level in the side elevations of the proposed development and to ensure that the proposed ground floor bathroom window is obscure glazed.

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

Parking and Highways

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 require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards.

The application property has four bedrooms and on-site parking for three/four vehicles (in a car port and frontage parking area). The proposed development would reduce the number of bedrooms to three and would remove the car port and provide an amended frontage parking layout. The GBC Highways Officer has not raised an objection to the proposal.

According to the Borough Council's adopted Vehicle Parking Standards, a three bedroom dwelling should have two vehicle parking spaces. Therefore, the proposal would provide sufficient parking and if planning permission is granted, a condition should be attached to require the parking to be provided in accordance with the submitted drawings and thereafter retained permanently.

Overall, it is considered that the proposal would make sufficient provision for the parking of cars within the site in accordance with the Borough Council's adopted Vehicle Parking Standards and would be in line with 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.

Biodiversity

The application site is located in a Biodiversity Opportunity Area and as such, Policy CS12 of the Gravesham Local Plan Core Strategy 2014 is especially relevant. It states that there will be no net loss of biodiversity in Gravesham and that opportunities to enhance, restore, recreate and maintain habitats will be sought, particularly within Biodiversity Opportunity Areas.

The KCC Biodiversity Officer has highlighted the potential for adverse light impacts to bats and the need for ecological enhancement at the application site.

The applicant has set out that there are existing wildflowers at the rear of the application site and that bird and bat boxes can be installed. She has also identified that upper level windows would be recessed into the building and that modern LED controlled directional lighting would control light spillage. These are positive features which would reduce impacts to wildlife and improve biodiversity and can be the subject of conditions on any planning permission granted.

Overall, it is considered that the proposed development would not be detrimental to biodiversity and would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

Climate change

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to take advantage of opportunities to build in resilience to the effects of climate change.

The applicant refers to the current use of an electric charging point at the application site but it is not clear if one would be included as part of the proposal. Nonetheless, the new building would remove historical extensions and alterations to the building and utilise modern building techniques, which should result in

reduced energy consumption.

To ensure that climate change resilience forms part of the proposed development, a planning condition can be included to this effect, on any planning permission granted. As such, the proposed development would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).

Any Other Material Planning Considerations

The application site is located within an area of multi-period archaeological potential and Groundwater Source Protection Zone 3. However, as the proposed development is within the confines of an existing residential garden, only a relatively small amount of groundworks would occur and because existing foul and surface water drainage would be used, 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 applicant has provided a number of statements in the Design and Access Statement which the Council believe are not accurate. These are outlined and commented on as follows;

- *The existing floor area of the building is 137 square metres* - it should be noted that this figure is taken from an internal measurement of the ground and first floor areas. The actual existing floor area is 155 square metres (measured externally from the submitted drawing). Furthermore, to assess whether the proposal is a disproportionate addition to the building, it is the original floor area that is relevant (paragraph 154(c) of the NPPF 2023) and all measurements are taken externally (Policy C13 (ii) of the Gravesham Local Plan First Review (1994)).
- *The overall floor area would be reduced by 7 square metres* – this is a misleading figure as it offsets a proposed increase in habitable floor area (17.4 square metres) with the removal of an open car port (25 square metres), which is not habitable floor area. In actual fact, the existing overall floor area would increase by 17 square metres. It should be noted that the loss of the car port is relevant to the assessment of the impacts of the proposal on the openness of the Green Belt but it does not justify any increase in habitable floor space. Furthermore, as highlighted above, any proposed floor area increase must be judged against the original dwelling and not the existing dwelling. The proposal constitutes an increase of 112 square metres above the original floor area of the building.
- *The proposed new roof would only increase the original ridge by 870mm* – when measured from the submitted plans the existing dwelling has a maximum height of 5.7 metres and the proposed dwelling has a maximum height of 7.3 metres, which represents an increase of 1.6 metres.
- *The major reason for previous refusal has been based on an unacceptable floor increase* – this is a simplification of the previous ground of refusal. It should be noted that the proposal was judged on a range of factors including footprint, floorspace, volume, scale, mass and height.

Very special circumstances

Referring to paragraphs 152 and 153 of the NPPF 2023, inappropriate development in the Green Belt should not be approved except in very special circumstances and that very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The applicant has identified a number of issues which she considers to amount to very special circumstances. These are summarised and commented on as follows;

- *The ground floor extension would meet permitted development rules* – The ground floor extension would not be permitted development because it would adjoin the existing rear conservatory (which is also adjoined to a single storey side extension) and the total enlargement would extend beyond a wall forming a side elevation of the original dwellinghouse and would have a width greater than half the width of the original dwelling.
- *The existing width of the dwelling would be reduced by 2.7 metres* – The narrowed building footprint would be a positive feature of the proposal, as the building would be set further away from the site

boundary, reducing the spread of built development across the plot. However, the size and bulk of the proposed roof and the increased height of the building would significantly increase the amount of built development at the application site, to the detriment of openness. It is considered that the narrowed building footprint would not offset the increase in built form overall.

- *Design revisions following a pre-application enquiry have reduced the scale and bulk of the proposal* - This is useful background information but the application has to be determined with reference to the submitted details only.
- *Example provided of a similar scheme at The Orchard, Priestwood Road (20210089)* - Details of application 20210089 are contained in Appendix 2. The Orchard, Priestwood Road is located some 270 metres to the south east of the application site. The proposed development there comprised of a much smaller extension to a building that was already of significant size. Therefore, that proposal is not directly comparable to the current proposed development. Furthermore, it should be noted that each planning application must be considered on its own merits, with reference to the individual circumstances, as well as to the development plan policy framework and to any other material planning considerations. As such, the citing of cases of existing developments is unlikely to be the determining factor in any planning decision.

Overall, it is considered that the applicants' justifications for the proposal either individually or cumulatively do not amount to the very special circumstances that would set aside the objection to the development on grounds of being inappropriate development.

Conclusion & balancing exercise

The above analysis sets out that the proposed development would be detrimental to the openness of the Green Belt and contrary to one of the purposes of including land within the Green Belt, namely protecting the countryside from encroachment. The development would be a disproportionate addition to the building, consolidate and extend the level of built development at the application site to an unacceptable level and be inappropriate development in the Green Belt.

No very special circumstances have been advanced pursuant to paragraphs 152 and 153 of the NPPF 2023 sufficient to overcome the presumption against such inappropriate development.

The proposed development would provide a good standard of living for future occupiers, be appropriate in design, would not be detrimental to the surrounding landscape, biodiversity, residential amenity or highway safety and would not adversely affect groundwater or archaeology. All of which weigh in support of the proposal.

However, the proposed development would constitute inappropriate development in the Green Belt, which would be detrimental to openness. As such, the proposal would be contrary to section 13 of the NPPF 2023, to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 and to Saved Policy C13 of the Gravesham Local Plan First Review (1994).

On balance, it is considered that the benefits of the proposal are significantly and demonstrably outweighed by the significant harm to the openness of the Green Belt.

Recommendation

Refusal on the following ground;

1. The proposal, by virtue of its proposed size, scale, massing and form, would be inappropriate development in the Green Belt, as it would result in disproportionate additions over and above the size of the original dwelling and harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal would be contrary to Policy CS02 of the Gravesham Local Plan Core Strategy September 2014, Saved Policy C13 of the Gravesham Local Plan First Review and to Section 13 of the National Planning Policy Framework 2023.

(For detailed informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	28th February 2024	Dated:	01 March 2024