

27th March 2025



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Dear Planning Team,

Re: Gravesend – No 24 Dover Road, Northfleet, DA11 9QD
Householder planning application for aground floor and first-floor rear extension

Background

We act on behalf of Mr Nerijus Kuneckis in relation to the above site and are instructed to submit a householder planning application for a first-floor rear extension alongside the re-application of a ground floor rear extension of which a similar size and scale was previously granted consent under prior approval application **Ref 20240745**.

In support of this application, please find enclosed:

- Completed application forms and relevant ownership certificate, and
- Site location plan and accompanying existing & proposed drawings package.

In addition to the above documentation, this letter provides a detailed assessment of the key planning and design issues and should therefore be taken into consideration in the determination of the planning application.

Site and Surroundings

The site relates to a two-storey semi-detached property located on the eastern side of Dover Road, Gravesend. The property benefits from a substantial setback of 9 metres to the highway with a large lawned front garden, primary vehicle access is provided to the rear of the existing dwelling via an unadopted road off Lime Avenue.

The site is considered to be a highly sustainable, accessible location. Located approximately 200 metres from an identified Local Centre with very good accessibility to public transport with a number of high frequency bus routes situated on both Thames Way 550 metres to the south, and London Road 220 meters to the north.

The immediate surrounding area is predominantly residential in character and comprises a mix of two-storey semi-detached, and terraced houses, many of which benefit from ground and first floor rear extensions. As a result there is no defined building line to the rear with rear extensions of varying size, scale and design creating a varied street scene character.

Importantly, the site benefits from an extant planning permission (**Ref 20240745**) for a single storey rear extension with a depth of 5.95 metres, maximum height of 3.00 metres and eaves height of 3.00 metres as discussed in the Planning History section below.

Please refer to the extract of the site location plan and images below.

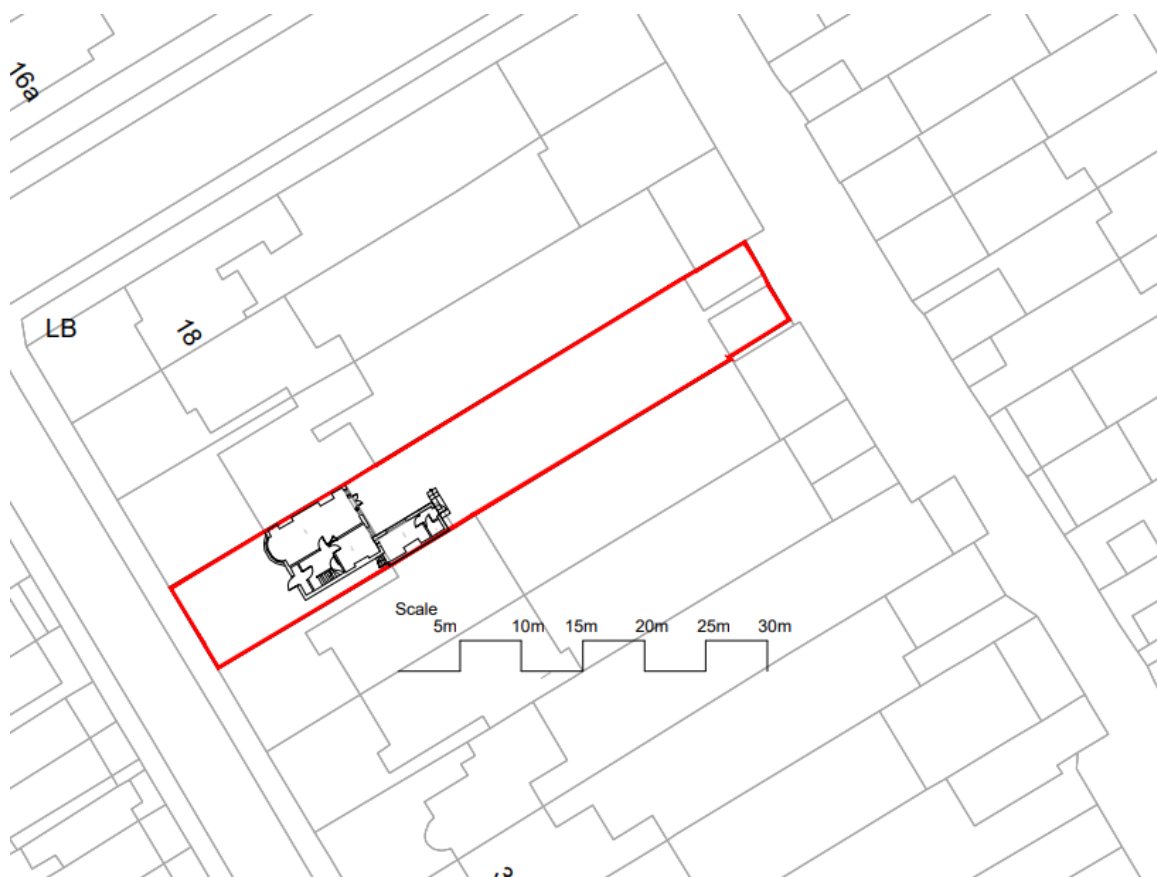


Image 1: Extract of site location plan



Image 2: Photograph of front elevation of property as viewed at street level

Planning History and Proposal

The site has been subject to a number of planning applications in recent years with those considered to be of relevance to this application summarised below.

Historically, application **Ref 20230763** proposed the erection of a full width ground and partial width first floor extension alongside the creation of an enlarged basement area - Refused 2nd October 2023. The application was refused for the following reasons as set out within the Decision Notice and Delegated Report:

- The proposed development constitutes overdevelopment of the site, resulting in bulky, disproportionate incongruous additions that are not subordinate or sympathetic to the existing property, contrary to Policy CS19, and
- The proposal would be detrimental to neighbouring amenity and would result in a detrimental sense of enclosure, contrary to Policy CS19.

A prior approval application **Ref 20240333** was then made for a single storey rear extension with a depth of 5.95 metres, maximum height of 3.00 metres and eaves height of 3.00 metres - Refused 13th May 2024. Importantly as a prior approval application this proposal was refused on the below technical grounds:

- The Council contended the existing rear kitchen outrigger of the property formed part of the original dwellinghouse as built. As a result, the Council considered the extension would extend beyond a side elevation forming part of the original dwellinghouse. Accordingly, the width of the proposed extension must not be more than half the width of the existing dwellinghouse (as measured at its largest point) and permission was therefore refused.

More recently, a prior approval application **Ref 20240745** was made for a single storey rear extension with a depth of 5.95 metres, maximum height of 3.00 metres and eaves height of 3.00 metres - Approved 24th September 2024.

Importantly, following the Council's assessment of the 2023 application **Ref 20230763** in particular, this proposal has been carefully considered to address all previous areas of concern held by the Council.

In particular all basement works have been removed as part of this application with the proposed development relating solely to the ground floor and first floor of the property.

Additionally, unconstrained by the regulations of the General Permitted Development Order this full planning application seeks to provide a uniform roof form over the entire ground floor rear extension. Whilst the uniform pitch of the first floor extension has been carefully designed to assimilate into the main roof style of the dwelling, ensuring a congruous design rationale throughout the development in contrast to the 2023 proposal, a key concern raised by the Council in their assessment of the previous application on site.

In a similar manner to the more recent prior approval application which was approved at the site, a setback of 0.65 metres is proposed to be maintained to the shared boundary of No. 22 Dover Road at ground floor level which will continue to ensure there is no unacceptable impact on the amenity of neighbouring properties by way of enclosure or loss of light again.

Planning Policy

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was revised in December 2024 and sets out the Government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development.

Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework.

Achieving well-designed places

Paragraph 135 states that planning policies and decisions should ensure that developments;

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Gravesham Development Plan

The Development Plan currently consists of the Coventry Local Plan Core Strategy 2014 and relevant Supplementary Planning Documents.

The policies of key relevance to the assessment of the development proposal are summarised below.

Gravesham Local Plan Core Strategy

Policy CS01 (Sustainable Development) states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible.

Policy CS02 (Scale and Distribution of Development) confirms that over the plan period, the Borough will retain and improve its existing stock of housing and suitable employment land and make provision for the objectively assessed need for at least 6,170 new dwellings.

Policy CS12 (Green Infrastructure) states that a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained to improve access within the urban area.

Policy CS18 (Climate Change) addresses the climate change issues of: flood risk; the Water Framework Directive and Thames River Basin Management Plan; sustainable drainage and surface water run-off; water demand management; carbon reduction; and coastal zone management.

Policy CS19 (Development and Design Principles) states that new development will be visually attractive, fit for purpose and locally distinctive. It will also conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.

Householder Extensions/Alterations Design Guide SPD

The SPD sets out general design principles for householder extensions/alterations. Of relevance to this application are Sections 9 and 10, which confirm the key principles for new development and outlines the types of extensions and alterations that may be considered acceptable.

Section 9 of the SPD provides guidance relating to key principles for new development.

Paragraph 9.2 of the SPD advocates that any proposed extensions or alterations to a house should respect the original character of the existing dwelling, complement and correspond with the character of neighbouring properties and the local area.

Paragraph 9.5 concerning overshadowing states that extensions should not create an unreasonable amount of overshadowing of neighbouring properties and should take account of the orientation and position of neighbouring properties, and in particular any impact that the extension will have on neighbouring windows and private gardens. Additionally, Paragraph 9.6 states that there should be no direct overlooking into neighbouring habitable rooms or private amenity spaces or neighbouring gardens. Furthermore, in regard to overbearing and outlook careful consideration will need to be given to the relationship to existing neighbouring windows and to the size and design of an extension that may change the outlook from a neighbouring property.

Paragraph 9.8 states that architectural details such as sills, barge boards, brick coursing, window positions and sizes on an existing property are part of its character and should be replicated in proposed extensions. Window arrangements, their proportions, size, materials and opening style should also reflect the existing dwelling. Additionally, Paragraph 9.9 concerning materials states that extensions should normally be constructed using matching materials to the main dwelling.

Section 10 outlines the type of residential extensions and alterations that the council may consider acceptable.

Paragraph 10.3 states that proposals for two-storey rear extensions should consider the surrounding context and ensure that:

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

- Garden Space: Adequate garden area for the enlarged house should be retained following development

Planning Issues

Principle of Development

The site relates to an existing residential dwelling located within an established residential area.

To confirm the site does not lie within a Conservation Area nor is it in the curtilage of a listed building. Furthermore, it is noted that there is no defined rear building line in the street scene with a number of properties benefitting from ground and first floor extensions of varying sizes and scale.

As such, the principle of extending the property is considered to be acceptable provided that there will be no significant adverse impact upon the amenity of neighbouring properties or significantly harmful impact upon the visual character of the surrounding street scene.

Design

As summarised above, the application seeks consent for a part ground floor, part first floor rear extension. However, importantly the property does already benefit from a single storey ground floor extension which forms a lawful fallback position for the site under application **Ref 20240745**.

The proposed alterations have been revised from previous applications at the site, most notably **Ref 20230763** in 2023 which proposed a basement, ground floor extension, and first floor extension to positively respond to Council concerns.

As a result, it is our view that the proposal adheres to all relevant criteria of the Gravesham Householder Extensions/Alterations Design Guide as summarised.

- **Depth: The extension does not dominate the original property. This can cause the site to appear overdeveloped, and cause long dark internal spaces to be formed. Extensions to extensions will generally not be supported.**
 - The proposed extensions would not dominate the original property with 50% of the first floor area remaining undeveloped to the north ensuring the proposed ground and first floor extension remains subordinate to the original dwelling.
- **Height: two storey extensions can have very significant impact on neighbouring amenity, so should generally not be built up to site boundaries with neighbouring gardens / properties.**
 - The proposed extension maintains a significant set back at ground and first floor level to the adjoining property at No. 22 Dover Road. Unfortunately the same setback cannot be maintained for No. 26 Dover Road at first floor level however careful consideration has been made to retain 45 degree views and thereby ensure there is no adverse impact upon amenity by loss of light or enclosure.
- **Width: Extensions should not be of greater width than the original building.**
 - The proposed extensions would not exceed the width of the original dwelling.
- **Design: Taller extensions are of greater visibility, and should incorporate roof designs to reflect, tie in with and not overwhelm the main property's roof. Patterns and proportions of windows should reflect the host building and local character.**
 - A crucial point in the refusal of the historic 2023 scheme on site, this proposal has been revised to ensure a continuous flat roof is maintained at ground floor level over the pre-existing outrigger and newly proposed rear extension, with a hipped roof at first floor level which has been carefully pitched to ensure it harmoniously matches the existing roof slope and style of the property.
 - Additionally, the fenestration of the proposed dwelling will utilise the same patterns and proportions of the existing property to ensure there is no significant departure from the character of the property as built.
- **Materials: Using matching external materials and window / door frames is especially relevant for two storey extensions.**

- External materials will match those of the original dwelling.
- **Overlooking: Extensions should avoid inserting any flank windows, or involve raised platforms where they would allow new, or increased overlooking views into neighbouring gardens / properties.**
 - No windows are proposed in the flank elevations of the extensions.
- **Light / Outlook: The 45 / 25-degree rule will be used to assess the impact of the extension on neighbouring light / outlook.**
 - The proposed rear extension has been carefully designed to ensure it complies with the 45-degree rule vertically and laterally as set out within the Householder Extensions/Alterations Design Guide Supplementary Planning Document, further details of which may be provided upon the Local Authorities request.
- **Garden Space: Adequate garden area for the enlarged house should be retained following development**
 - Significant front and rear amenity space will be retained by the property following development.

In considering the character of the wider surrounding street scene it is noted that a number of properties benefit from full width ground floor extensions and partial first floor extensions of varying size and design.

In particular the Council's attention is drawn to Nos. 20, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48 and 50 Dover Road all of which benefit from an extension or outrigger at first floor level.

Whilst a number of these extensions and outriggers have not been approved under the Council's current Local Development Framework. They nevertheless form an important contribution to the prevailing character of the street scene, setting the tone for the siting, size, massing and projection of rear additions in the locality.

As a result, they should be given due consideration in the assessment of this application, especially in considering what size and scale of extension is acceptable in the locality.

The existing character of the property (as a two-storey semi-detached dwelling), and the wider street scene will therefore be preserved as a result of the proposal in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy and sections 9 and 10 of the Householder Extensions/Alterations Design Guide SPD.

Amenity Impact upon Neighbours

In considering neighbouring amenity, it is noted that the proposed ground floor extension is situated 0.65 metres away from the shared boundary with No. 22 Dover Road whilst the first-floor element of the extension is situated approximately 3.6 metres away. Thereby, ensuring clear 45 degree views will be retained to No. 22 Dover Road with no significant overshadowing or enclosing impact.

Whilst the proposed first floor extension will project approximately 1 metre deeper than that which was refused in 2023, it is not considered that this will result in any unacceptable impact upon the amenity of No. 26 Dover Road with a similar relationship to the existing lean to outrigger roof expected to be maintained.

Accordingly, there will be no harmful impact upon neighbouring amenity for Nos. 22 or 26 Dover Road in terms of loss of light, loss of outlook, loss of privacy, or sense of enclosure.

Conclusion

The proposed extensions and outbuilding will be of a high-quality design which will remain subservient in scale to the host property. The proposed design will help ensure that there will be no unacceptable impact upon the visual character of the existing dwelling or wider street scene.

The scheme has been carefully designed to ensure that there will be no adverse impacts upon the amenity of the occupiers of any neighboring properties by way of overlooking or being overbearing in nature.

Accordingly, the proposal complies with Policies CS01, CS02, CS12, CS18, and CS19 of the Local Plan and sections 9 and 10 of the Householder Extensions/Alterations Design Guide SPD and should be approved on this basis.

Next Steps

We look forward to receiving confirmation of validation in due course. If there are any queries, please contact the undersigned in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to be 'H. Johnson', with a stylized, cursive script.

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