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18<sup>th</sup> November 2025

Gravesham Borough Council  
Planning Department  
Civic Centre  
Gravesend  
Kent DA12 1AU

Dear Sir/Madam,

**A25260.1 – 11 Ryecroft, Gravesend**  
**Our reference – A25260.1/251118/GBC/SJB**

On behalf of our Clients, Mr and Mrs S. Barker, the owners of the property, we confirm the submission online today of a Householder planning application, Planning Portal reference PP-14444675, for proposed works at 11 Ryecroft Gravesend Kent DA12 4QQ, comprising in addition to this covering letter:

- Completed application form,
- 1000 Location Plan,
- 1001 Existing Site Block Plan,
- 1002 Existing Site Photographs,
- 1010 Existing Ground Floor Plan,
- 1011 Existing First Floor Plan,
- 1013 Existing Roof Plan,
- 1020 Existing Section AA,
- 1030 Existing North Elevation,
- 1031 Existing South Elevation,
- 1032 Existing East Elevation,
- 1033 Existing West Elevation
- 1101 Proposed Site Block Plan Rev A,
- 1110 Proposed Ground Floor Plan Rev A,
- 1111 Proposed First Floor Plan Rev A,
- 1113 Proposed Roof Plan Rev A,
- 1120 Proposed Section AA Rev A,
- 1121 Proposed Section BB Rev A,
- 1130 Proposed North Elevation Rev A,
- 1131 Proposed South Elevation Rev A,
- 1132 Proposed East Elevation Rev A, and

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- 1133 Proposed West Elevation Rev A.

This application has been prepared and submitted following an earlier planning application, reference 20250705, refused planning consent on 6<sup>th</sup> November 2025. The reasons stated for refusal comprise:

1. *The proposed development, by virtue of its size, bulk, design and the loss of open land, would not be subservient to the existing building and would be an urbanising, overdevelopment of the application site. As such, the proposal would be out of character with the existing building and the surrounding area, would be detrimental to the visual amenities of the street scene and would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014), to Paragraph 135 of the National Planning Policy Framework 2024 and to the Householder Extensions/Alterations Design Guide 2023.*
2. *The proposed development, by virtue of the substandard levels of private amenity and bedroom space and its window design, would result in poor living conditions for future occupiers. The proposal would therefore be detrimental to residential amenity and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, to paragraph 135(f) of the National Planning Policy Framework (2024), to the Nationally Described Space Standards (2015) and to the Residential Layout Guidelines (June 2020).*
3. *The proposed development, by virtue of the inclusion of windows in the side elevation and their proximity to the front elevations of nos. 3 and 5 Ryecroft, would lead to a detrimental level of overlooking and an unacceptable loss of privacy for the occupiers of those properties. The proposal would therefore be detrimental to the residential amenity of the occupants of nos. 3 and 5 Ryecroft and would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, to paragraph 135(f) of the National Planning Policy Framework 2024 and to the Residential Layout Guidelines (June 2020).*

The Delegated Officer Report comments that appear to support these reasons comprise:

#### Design, Character and Appearance

*The proposed development would result in a significant increase in built form at the side of the application property and reduce the size of the open, grassed area by approximately half. Despite the small set backs and set down, the proposal would not appear subservient to the existing building and would add significant size and bulk to the side, in a highly prominent location. This combined with the loss of the open, green space would mean that the proposal would undermine the character and appearance of the application property and the surrounding street scene.*

*Overall, it is considered that the negative impacts of the proposed design would significantly outweigh the positive features. The proposed development, by virtue of its size, bulk, design and the loss of open land, would not be subservient to the existing building and would be an urbanising, overdevelopment of the application site. As such, the proposal would be out of character with the existing building and the surrounding area, would be detrimental to the visual amenities of the street scene and would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014), to Paragraph 135 of the NPPF 2024 and to the Householder Extensions/Alterations Design Guide 2023.*

#### Amenity of Future Occupiers

*The proposed first floor bedrooms would exceed the minimum floor area requirements (when built in storage is taken into account) for a single (bedroom 4) and a double (bedroom 3) in the NDSS (2015). However, the ground floor bedroom would be below the minimum floor area requirement for a double.*

*According to the proposed block plan, the proposed garden area and length (some 25 square metres and 5.2 metres respectively) would be significantly below the requirement for a dwelling with four or more bedrooms in the RLG (100 square metres and 10 metres). Whilst it is noted that the original garden at the application site was substandard for a three bedroom dwelling, living conditions have been further compromised by the erection of a rear extension, which reduced the available amenity space. The current proposal would increase the number of bedrooms/occupiers at the property which would compound the existing substandard arrangement and be significantly detrimental to the living conditions of future occupiers.*

*Due to the ground floor location and its close proximity to the roadway (some 7 metres), to the front elevations of no. 3 Ryecroft (15 metres) and no. 5 Ryecroft (20 metres), the occupants of proposed bedroom five are likely to be subject to adverse overlooking from passers-by and existing occupiers. A single window in the side elevation would be the only means of natural light and outlook for this room and as such, obscure glazing/high level design would not be appropriate methods to mitigate the loss of privacy. This combined with the small floor area of the room would lead to poor living conditions for future occupiers.*

*Due to the small, high level nature of the proposed rear window for bedroom four, the outlook and natural light for future occupiers would be poor. Although the proposed secondary side window could improve matters, this*

window would need to be obscure glazed (to preclude adverse overlooking to neighbours as set out below) and therefore, the living conditions for future occupiers of bedroom four would be relatively poor. Overall, the proposed development, by virtue of the substandard levels of private amenity and bedroom space and its window design, would result in poor living conditions for future occupiers. The proposal would therefore be detrimental to residential amenity and contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, to paragraph 135(f) of the NPPF 2024, to the NDDS and to the RLG.

#### Neighbouring Amenity

The proposed development would introduce a number of new windows to the application property. The RLG set out that privacy distances between facing windows should be met, in order to prevent overlooking. A privacy distance of 21 metres is required for facing windows where there is no private garden area in between and a privacy distance of 26 metres is required where a private garden is within the field of view.

A first floor bedroom window would be located in the proposed rear elevation facing the side elevation of no. 10 Ryecroft (which has three windows) and has a privacy distance of some 10 metres. The sill height for the proposed window would be less than 1.7 metres and as such, it would not preclude overlooking to no. 10 Ryecroft. Although it is noted that the existing rear windows at the application site have similar overlooking impacts and the affected windows at no. 10 appear to be non-habitable rooms.

Seven windows would be included in proposed side elevation (at ground floor, a bedroom, two living room and an ensuite and at first floor, two bedrooms and an ensuite). These windows would directly face the front elevations of nos. 3 to 5 Ryecroft and would obliquely face the side elevation of no. 2 Ryecroft. The oblique view towards, what appears to be a hallway window at no. 2, would mean that no adverse overlooking impacts would occur to the occupiers of no. 2. Furthermore, the proposed ensuite windows would be obscure glazed and would not cause any adverse overlooking impacts.

For the other windows, the privacy distances would be 15 metres, 22 metres and 20 metres for nos. 3, 4 and 5 respectively. Which would mean that adverse overlooking impacts would occur to the occupiers of nos. 3 and 5 Ryecroft. As secondary windows, obscure glazing could be used to mitigate any overlooking from the living room and first floor bedroom windows. But for bedroom 5, the side window would be the only means of natural light and outlook and as such, obscure glazing would lead to poor living conditions for future occupiers. Therefore, the overlooking impacts from this window could not be mitigated and would be detrimental to the residential amenity of the occupiers of nos. 3 and 5 Ryecroft.

Overall, it is considered that the proposed development, by virtue of the inclusion of windows in the side elevation and their proximity to the front elevations of nos. 3 and 5 Ryecroft, would lead to a detrimental level of overlooking and an unacceptable loss of privacy for the occupiers of those properties. The proposal would therefore be detrimental to the residential amenity of the occupants of nos. 3 and 5 Ryecroft and would be contrary to Policy CS19 of the Gravesham Local Plan Core Strategy September 2014, to paragraph 135(f) of the NPPF 2024 and to the RLG.

#### **Conclusion**

The proposed development would have no adverse highways, groundwater or archaeological impacts and the proposed external facing materials, surfacing for the parking area, most fenestration and the roof design would match existing. All of which weigh in support of the proposal. However, the proposed development would not be subservient to existing dwelling, would be out of keeping with its surroundings and be an overdevelopment of the application site, which would be detrimental to the visual amenities of the street scene. Furthermore, it would result in poor living conditions for future occupiers and cause adverse overlooking impacts to the occupiers of nos. 3 and 5 Ryecroft, which would be detrimental to residential amenity.

Overall, it is considered that the adverse impacts of the proposed development attract significant weight and would significantly and demonstrably outweigh the benefits of the proposal. Therefore, following a thorough assessment of the application and all material planning considerations, it is considered that the proposed development cannot be supported.

The Delegated Officer Report also states the following;

#### Any Other Material Planning Considerations

The applicants have set out that there are specific personal family needs for the proposed development, i.e. the accommodation of an elderly parent who requires 24 hour care. Whilst the personal circumstances of the applicants and their family are sympathised with and acknowledged, it is considered that they do not outweigh the significant design and residential amenity concerns raised above.

One representation has raised various issues, the majority of which have been covered in the above discussion. The outstanding issue is summarised (in italics) and commented on as follows;

- *The proposed annexe represents an efficient and sustainable use of the existing residential plot,*
- *which supports flexible living arrangements, including multigenerational households, and offers a practical response to local housing and care needs without necessitating large-scale new development – this is acknowledged and there is no, in principle, objection to the formation of an annexe. However, in this instance, the detailed design of the proposal would be detrimental to the visual amenities of the street scene and residential amenity and it is considered that these issues outweigh the benefits of providing the annexe.*

Notwithstanding that the comments supporting the reasons for refusal are disputed, the revised proposals, comprising a single-storey side extension and associated internal and external works, have been developed to directly address all the principal concerns raised in respect of the earlier application, with the exception of the existing rear garden amenity space.

This a compromise that the current occupiers, the applicants, have accepted in assessing and balancing their current urgent needs and future occupiers, prior to purchasing the property, will also have the choice to do so or not. Given this and the existing extensive garden frontage to the property, it is considered that this sole adverse aspect is significantly outweighed by benefit of the proposals, the provision of accommodation for an elderly parent requiring 24 hour care.

These revised proposals are otherwise fully compliant with both national planning policies, including the NPPF and associated guidelines, and local planning policies including, in particular, the Gravesham BC Householder Extensions/Alterations Design Guide (SPD) with no detrimental impact on any adjoining property and, as such, should therefore be considered favourably.

Should there be any queries or concerns with any aspect of the proposals, we would be pleased to review the proposed works with yourselves in order to achieve an agreed and acceptable proposal prior to the determination of this application.

The respective application fee of £528 and the Planning Portal service charge of £85, both including VAT, will be paid separately and directly by the applicant.

We would be pleased to receive the following from you:

- Confirmation of receipt of this application, its validity, registration and that no further information is required,
- A receipt for the application fee,
- Confirmation of the timescale for the formal response to this application.

We look forward to your acknowledgement of receipt of this application at your earliest convenience.

Yours faithfully



Steve Baker  
BA(Arch)(Hons) B.Arch(Hons)(Reilly) ARB RIBA

Principal

For and on behalf of Steve Baker Architect

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cc – Mr and Mrs S. Barker

Enc

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