

Pre-Application Response

Reference	PRE20240012
Site	Otarawairere, Henley Street, Luddesdown, Gravesend, Kent, DA13 0XB
Proposed Development	Proposal for a two-storey side and rear extension and increasing the height of the existing bungalow so as to become a two storey dwelling.
Case Officer Details	Mr Ethan Bonthron E-mail: ethan.bonthron@gravesham.gov.uk
Date of Advice	22 nd March 2024

I am writing with reference to your request for pre-application advice at the above site, received as valid on 18th January 2024.

I have now had the opportunity to review your proposal, following our meeting on site (5th February 2024) and can offer the following comments:

Site Description

Otarawairere is a detached 1950s bungalow located on the northern side of Henley St. The property has been extended to the side and rear in 1963 and 1984 respectively.



The site is within the Metropolitan Green Belt and the Kent Downs National Landscape (formerly AONB).



-  Green Belt (CS02)
-  Area of Outstanding Natural Beauty (CS12)
-  Local Wildlife Sites (CS12)

Relevant Planning History

Reference	Description	Decision	Decision Date
19840537	Erection of single storey rear extension to form breakfast room shower room and conservatory	PERMITTED	24.07.1984
19570197	stationing of caravan for residential use	PERMITTED	16.12.1957
19560112	Erection of a detached bungalow	PERMITTED	11.07.1956
19520302	Development of land for residential purposes.	NO OBJECTION	01.01.1900

Planning History Note

The site is within the Metropolitan Green Belt and as such it is important to establish the 'original dwelling'. The satellite images below demonstrate how the property has been extended:



December 1960



December 1990

Based on the historic evidence above, the original dwelling is as highlighted in red below (with the extensions in blue):



Therefore, the original footprint of the property is considered to be approx. 88m² (this is a rough calculation, as there are no scaled plans provided as part of this pre-application).

Proposal

This pre-application is not supported by any plans to assess, however the description of the proposal states the following:

“The alterations would include a two-storey side and rear extension and increasing the height of the existing bungalow so as to become a two storey dwelling.”

On site, the possibility of demolishing the existing dwelling and erecting a replacement dwelling in a similar design to the neighbour (Luddesdown House). However, no plans have been provided for this development and therefore the advice will be somewhat limited and based on local and national policy considerations.

For reference, the photographs below show the neighbouring property (Luddesdown House):



Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. 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.

The Development Plan for Gravesham currently comprises:

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

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principle

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

- P3 – Vehicle Parking Standards
- C12 – Replacement Dwellings in the Countryside
- C13 – Extensions to Dwellings in the Countryside

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

Other Material Considerations

Supplementary Planning Guidance and other Documents:

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

<https://www.gravesham.gov.uk/local-plan-policy/supplementary-planning-guidance>

The following documents are relevant to the consideration of this enquiry:

- SPG2 – Residential Layout Guidelines (2020)
- SPG4 – KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Gravesham Householder Extensions/Alterations Design Guidance (SPD) (2021)
- Gravesham Landscape Character Assessment (2009)
- Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan (2021-2026)

Officer's Analysis

The application site is located in the Green Belt and as such Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) 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 LPCS.

There are five principle issues in determining this application;

1. Is the proposed development appropriate in the Green Belt?

2. The effect of the proposal on the openness of the Green Belt;
3. Any very special circumstances?
4. Impact on the Landscape;
5. The effect on the character and appearance of the area; and
6. Other matters.

1. Is the proposed development appropriate in the Green Belt?

Extension to the Dwelling

There are strict policy considerations within the Green Belt whereby paragraph 152 of the National Planning Policy Framework (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 153 goes on to say that very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it falls within the specified exceptions. The relevant exception to consider for this application is part d of paragraph 154 of the NPPF (2023), which states that it may be acceptable to replace a building, provided the new building is in the same use and not materially larger than the one it replaces.

Therefore, it is important to first establish the extent of the original property and then consider any additions or extensions. As set out previously, the original dwelling was modest bungalow, which has been extended to the sides and rear.

Based on rough calculations, the original dwelling is considered to have been approximately 88m², and following extensions the footprint has been increased to 194.6m², which represents a 121% increase above the original.

	Original Dwelling	Existing Dwelling	% increase
Footprint (m ²)	88m ²	194.6m ²	121%

As demonstrated above, the dwelling has been extended significantly above the one third limit set out in saved policy C13 and as such any additional extension above the existing footprint is unlikely to be supported and would be considered inappropriate development within the Green Belt.

Please note that the one third calculations include an assessment of the internal floor area and volume increases – these have not been assessed as part of this pre-application due to the limited information provided.

Replacement Dwelling

The option discussed on the site visit was the demolish the existing bungalow and erect a replacement dwelling. This development would relate to saved Policy C12 of the Gravesham's Local Plan First Review (LPFR) (1994) for a replacement dwelling in the countryside. This policy states that there will be a strong presumption against allowing the replacement of existing dwellings, which will only be set aside if the listed criteria are met. Criteria (iii) states that the 'replacement dwelling must be of similar scale and mass to the existing dwelling and must be no larger than the existing dwelling, unless it can be demonstrated that modest enlargement is required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate or to meet the special needs of the occupants'.

The proposed replacement dwelling, based on a similar design to the neighbour (Luddesdown House), is larger than the existing dwelling at two storeys. Therefore, to meet the criteria of saved policy C12 the scale and mass of the new dwelling would be increased. The scale of the neighbouring dwelling (Luddesdown House) is greater than Otarawairere (as existing), and therefore if a replacement dwelling is sought careful

consideration should be given to the design to reduce overall bulk and maintain a scale that is not disproportionate.

2. The effect of the proposal 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.

Any new built form of development is likely to impact on the openness of the Green Belt, however it is important to establish the degree of harm. Openness of the Green Belt has both a spatial and visual aspect. Without any details of the extensions or the replacement dwelling, the assessment of the impact on the openness of the Green Belt cannot be undertaken with certainty.

The site is located within the countryside and is part of a development of semi-detached properties which benefit from fairly deep plots. The collection of properties on Henley St have an urban feel, but is in a rural location on a country lane, with open fields surrounding the dwellings to the north and south.

As set out above, the proposed increase in height and two storey side/rear extensions would be inappropriate development. This would also have an impact on the visual and spatial openness of the Green Belt by increasing the overall scale and massing of the dwelling, and spreading the built form over and above the existing levels. Therefore, an extension to this scale is likely to be considered harmful to the openness of the Green Belt.

A replacement two storey dwelling would have a visual impact on the openness of the Green Belt, by virtue of increasing the height of the building, but is likely to be modest and reduced somewhat by the neighbouring two storey dwellings on either side. However, this is not confirmation as the Local Planning Authority cannot provide confirmation without any plans. If an application is submitted, a street scene plan should be submitted to allow an assessment of the visual openness.

In spatial terms, it is not possible to assess the impact of a replacement dwelling without any details. However, the spread of development over the land should be carefully considered, this would include hardstanding and the footprint of the replacement dwelling.

Reference back to paragraphs 152 and 153 of the NPPF (2023) informs us that 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. Whether the development causes any other harm and whether there are any other relevant considerations to balance the overall planning argument, should now be considered.

3. Very special circumstances

As referenced above, paragraphs 152 and 153 of the NPPF (2023) states that very special circumstances tilt the balance of inappropriate development that causes harm to the Green Belt. No specific arguments have been put forward by the applicant in relation to the assessment of 'very special circumstances'.

4. Impact on the Landscape

The application site falls within the Kent Downs Area of Outstanding Natural Beauty and the Meopham Downs Landscape Character Area. Paragraph 182 of the NPPF (2023) states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Policy CS12 (LPCS) seeks to protect the Green infrastructure within the Borough and states at 5.7. 26 the overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs National Landscape (formerly Area of Outstanding Natural Beauty) and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan and the Gravesham Landscape Character Assessment (2009). The Kent Downs Area of Outstanding Natural Beauty Management Plan (2021-2026) (attached as Appendix 1) sets out that its aim is to ensure that the natural beauty and special character of the landscape and the vitality of communities are recognised, valued, enhanced and strengthened well into the future.

The key policies development on this site, either extensions or replacement dwelling, from the Kent Downs AONB Management Plan (2021-2026) are as follows:

- SD2 - The local character, qualities, distinctiveness and natural resources of the Kent Downs AONB will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements.
- SD5 - Renewable and sustainable energy initiatives and energy efficiency measures will be pursued where they help to conserve and enhance the natural beauty and landscape character of the Kent Downs AONB and bring environmental, social and economic benefits to local people and ensure proposals conform with the Kent Downs AONB Renewable Energy Position Statement and resisted where they do not.
- SD7 - New projects, proposals and programmes shall conserve and enhance tranquillity and where possible dark night skies.
- SD8 - Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB.
- HCH5 - Opportunities to develop contemporary and innovative artistic, historic, cultural and scientific interpretation and celebration of the landscape and people of the Kent Downs will be pursued.
- BD5 - The protection, conservation, enhancement and extension of Kent Downs AONB priority and distinctive habitats and species will be pursued; the Biodiversity Duty of Regard will be actively promoted.

The site is semi-rural in character and as discussed above is located within a linear development of housing along Henley Street. Either the extensions to, or replacement dwelling, would increase the size of the building. Given the increased scale of development which would be visible and prominent, there could be impact on the natural beauty of the Kent Downs National Landscape. However, without any details or plans it is not possible for the Local Planning Authority to provide specific comments, but carefully considered design strategies should be adopted to accord with the Kent Downs AONB policies (this is expanded further in Section 5 below).

5. The effect on the character and appearance of the area

Policy CS19 (Development and Design Principles) (LPCS) states that new development will be visually attractive and locally distinctive. It should also conserve and enhance the character of the local built and natural environment and integrate well with the surrounding area. Moreover, Section 12 (Achieving well-designed and beautiful places) of the NPPF (2023) sets out that developments should function well and add to the overall quality of the area, be visually attractive and sympathetic to local character.

Gravesham's newly published Householder Extensions/Alterations Design Guidance SPD (2021) (attached as Appendix 2) set out key principles for developments. Although this SPD relates directly to extensions, it

does set out good design strategies that can be utilised in replacement dwellings. For instance, the SPD highlights the importance of new development complimenting and corresponding to existing character and the wider context and in this case the rural character of the area and other surrounding dwellings should be considered.

A replacement two storey dwelling would not have a detrimental impact on the character of the street scene due to the application property being the only bungalow on Henley Street, with other surrounding properties being two storey. Therefore, in principle a replacement two storey dwelling is considered to be acceptable. However, the design of the replacement dwelling is key, it should be at an appropriate scale for its rural setting, with features that minimise overall bulk within the Green Belt and should be finished in traditional materials that are suitable within the area.

6. Other matters

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be ‘fit for purpose’ and be ‘adaptable to allow changes to meet the need of users’. and that ‘the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines’ (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

It is unclear from the information submitted with this application how large the proposed dwelling would be, the number of bedrooms or the size of the rooms. Therefore, if any planning application is submitted in the future the following documents should be taken into account:

- Appendix 3 – Gravesham’s Residential Layout Guidelines (2020)
- Appendix 4 – Nationally Described Space Standards (2015)

Neighbouring

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring properties and land and Section 12 of the NPPF (2023) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

Without any plans it is not possible to make comment on any impacts on the amenity of neighbouring properties, however careful consideration should be given to amenity if an application is to be submitted. Moreover, any planning application would consult neighbouring properties and other statutory consultees which will be taken into account in the decision-making process.

Parking and Highways

The property currently benefits from a driveway and a double garage, which provides adequate space for off-street parking, in accordance with Gravesham’s adopted parking standards (SPG 4) (2006). It is unclear from this pre-application what the intended number of bedrooms would be, and therefore it is not possible to confirm if the development would comply with SPG4. As such, you are encouraged to review the parking standards prior to any application to ensure that adequate off-street parking is provided.

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact (‘net gain’) on biodiversity, compared to what was there before development. Section 15 (Conserving and Enhancing the Natural Environment) of the NPPF (2023) states that developments should conserve and enhance biodiversity, which can be achieved enhancement strategies integrated into design and measurable net gains within sites.

Therefore, any future application for development on this site should seek to secure biodiversity opportunities and deliver a net gain in accordance with policy.

Public Rights of Way (PROW)

The site is adjacent to Public Right of Way NS188, which runs along the western boundary. It is unlikely that any development would impact on the PROW, however it is important to note that the PROW should not be stopped up, blocked or impeded at any time by the development.

Summary

Although this pre-application report is limited due to the lack of information provided, it is clear from the increases above the original dwelling that the upward extension and two storey extensions proposed would be inappropriate development and harmful to the openness of the Green Belt.

Therefore, the option to demolish and rebuild the dwelling in accordance with saved policy C12 would be a more viable route to explore. However, this policy does state that the replacement dwelling should not be significantly larger than the existing and at a similar scale and mass, as such the design of the new dwelling should be proportionate and carefully considered to reduce overall bulk, whilst responding to the rural setting and protecting the character of the Kent Downs National Landscape.

If any application is submitted in the future, consideration should be given to the local and national amenity standards, neighbouring properties, parking provision and biodiversity.

Next Steps

If planning permission is sought, an application can be made through the Planning Portal, here:

<https://www.planningportal.co.uk/applications>

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at:

<https://www.gravesham.gov.uk/downloads/file/382/local-validation-list>

Prior to submitting a planning application, you may wish to engage the services of planning agent;

<https://www.rtpiconsultants.co.uk/#/>

For further pre-application services I would refer you to our website;

<https://www.gravesham.gov.uk/home/planning-and-building/pre-application-planning-advice/pre-application-service>

You are advised that **PRE20240012** is now closed.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.

