

Name	To which part of the draft supplementary planning document does this response relate?	Do you agree with the need to provide additional guidance on the Council's approach to Householder Extensions / Alterations Design Guidance SPD? If not, please explain why	Do you think that the guidance document provides a clear message and way forward for Householder Extensions / Alterations? Please elaborate on your answer and be as precise as possible.	Do you consider that any modification(s) should be made to the guidance document, prior to its adoption? If yes, if you are able to please put forward your suggested revised wording of any text. Please be as precise as possible.	Are there any additional comments on the document you would like to make?	GBC Comments
Meopham Parish Council	Section Title - 3, page 6 The guidance is welcomed as it promotes good design for local neighbourhoods and clearly sets out the planning policy requirements for extensions expected by GBC.	YES - So that applicants clearly understand what is expected when they make a planning application	YES - So that applicants clearly understand what is expected when they make a planning application	YES - The document does not include any guidance for building or adaptations for people with disabilities or special needs	No	No further action - guidance for meeting the needs of disabled or special needs residents is addressed through Building Control
Resident 01	All of it - the document is not easy to read and jumping around on hyperlinks is not conducive to people wanting to read your document.	YES - And I also agree with enforcing them too. Too many extensions are going up without planning permission because they are within "the 10 %" that impact on those around. I also think the the council should stop approving bungalow extensions that make them two storey. Accessibility in rural areas is being taken away - older residents or those with mobility issues would look for a bungalow in their home location, there is hardly any left now	NO - Too many other documents that you have to refer to .	YES - Bullet point the information that has to be adhered to regardless of which document it's in. The information needs to be in one place for people to read it and understand it .	There needs to be something about hard paving, drop kerbs and impact on parking. Where people are hard paving the back gardens as well as the front they should be told to put in additional drainage - the water runs off into neighbours gardens and they then get issues with excess water . Drop kerbs should be insisted upon before anyone hard paves the front - stops cars mounting the pavement and nearly running you over. Parking is a problem wherever you live in this borough and any extensions should not remove off road parking, convert your garage (many can't accomodate modern day cars) but make sure you have your car off the road. There needs to be guidance about tree maintenance and it should be enforced, lots of trees are planted too close to developments and the roots then cause issues on the pavements and with neighbouring foundations .	No further action - the document when published will follow required accessibility guidelines, however it is not possible to simplify planning legislation, guidance, development plan requirements, material considerations, etc into a list of bullet points.

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				<p>YES - - Page 9, section 8, is permission required: Discrepancies between LDC and PA are a huge problem, need eradicating. Try to steer applicants towards PA's, giving reasons why preferable? Many are using the LDC process to get round planning regulations, in a way that it is doubtful was originally intended. We would like you to be a lot tougher on LDC's - maybe set some firm local criteria for what should instead be a PA? And always include detailed statements in approvals about what an LDC has not permitted them.</p> <p>- Page 12 , Privacy: it would be helpful to expand this with information about the angles and distances, perhaps as an appendix.</p>		<p>No change required - A Lawful Development Certificate is sought to ensure household building work is lawful. It should be possible in most cases to decide whether or not a proposed project qualifies as permitted development there will inevitably be instances where the decision is less clear cut. To enforce residents to go down the Planning Application route would require permitted development rights to be removed through Article 4 Directions.</p> <p>Comments noted, additional information added.</p>

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Shorne Parish Council	Response is about various sections as specified in comments below.	<p>Yes - Good idea, essential to have rules and criteria in writing but will only help if applicants (and their agents) access it and follow it before applying. The status of the documents will be important as many regard guidelines as only being advisory. We have noticed an increased number of Appeals as applicants are less willing to accept advice or decisions that are against what they wish.</p> <p>Apologies for saying this, but the guidance also needs to be applied, and applied consistently, by Case Officers and decision makers when approving applications.</p>	<p>YES - Have said "yes" as mostly so, but there are some areas that could usefully be expanded or added (please see below). There are some matters which can be seen as subjective (e.g. a design being overbearing) and these always cause difficulty.</p>	<p>- Page 13, Trees : if trees are to be removed this should be justified, replacement provided and plantings detailed (if it will be possible). Can suitable trees be identified and TPO's applied as part of the PA approval process?</p> <p>- Page 14, extensions : The current and final number of bedrooms should be stated?</p> <p>- Page 17 , first picture - do you mean first floor or ground floor? Or just say that for all side extensions? Or do you just mean second floor set back compared to first? Very rarely applied for or approved nowadays?</p>	<p>We consider applications carefully and send in reps. We know you are very busy but sometimes an opportunity to discuss PA's before you make a decision, even a phone call would be useful, for us anyway.</p>	<p>No change required - When granting planning permission Local Planning Authorities such as Gravesham have an existing duty to ensure, whenever appropriate, that planning conditions are used to provide for tree preservation and planting. Orders should be made in respect of trees where it appears necessary in connection with the grant of permission.</p> <p>No change required - Planning Applications are received utilising standardised 1APP forms with requirements detailed further through the Council's Local List of Validation Requirements</p> <p>Comments noted - illustration updated</p>

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				<p>- Page 19 , front extensions: should show subsidiarity to the main roof? Add separate section discussing about the building line?</p> <p>- Page 20, Side roof extensions: We don't entirely agree against slope to full gable conversions if they have a neat appearance. Add something about side dormers?</p> <p>- Page 23, Outbuildings: note says should be subordinate. Glad to see that included but annoyed it hasn't been applied previously, plus problem of discrepancy with LDC .</p> <p>- Page 24, Parking , Garage and parking space dimensions: We have seen other local guidance in PA responses that recommend larger sizes? Maybe say what is the absolute minimum but also that you like to see more generous sizes and spacings and state what? Include a Table of the number of spaces there must be relating to the type of house and defined number of bedrooms?</p>		<p>Comments noted - bullet point one updated to provide clarity on design. However, a separate section is not needed to address building lines, as this would be taken into consideration when considering the location, scale and design of any front extension /porch.</p> <p>No change required - Most hip-to-gable loft conversions are within permitted development rules and do not require full planning permission</p> <p>Comments noted</p> <p>Comments noted - this will be addressed via the upcoming Kent Design Guide</p>

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				- Page 25 , front garden boundaries: ask them to provide a 1m verge in rural areas or anywhere there is no footway?		Comments noted - this would stray into policy making and cannot be achieved through an SPD
Historic England	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes this key planning document. We support the intention to provide guidance to householders and developers to ensure the highest standards of design are incorporated in planning and executing residential extensions and alterations throughout the Borough. We note the specific guidance in Section 7 relating to properties in conservation areas, and concur with the views expressed on in Section 7.8 about the need to seek appropriate advice in respect of works to listed buildings. Historic England would strongly advise that the Council's own conservation and design staff are closely involved with the preparation of the SPD, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to heritage assets.</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p>					Comments noted - however they do not require any specific changes to the draft SPD

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Natural England	<p>Thank you for your consultation request on the above dated and received by Natural England on 3rd September 2020.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Protected species Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here.</p> <p>While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>					Comments noted - however they do not require any specific changes to the draft SPD
Port of London Authority	No comment					No change required
Transport for London	No comment					No change required

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Southern Water	No comment					No change required
Ebbsfleet Development Corporation	The EDC considers that overall, the draft document, and particularly section 10, is overly text heavy. We have concerns that it would not be easily understandable to householders, and their agents, who should be referring to this prior to making an application. We would support the guidance being illustrated more clearly through a shorter bullet point list together with more images of the extensions and alterations that are acceptable and unacceptable.					Comments noted - however they do not require any specific changes to the draft SPD
	There is a missed opportunity for this document to be produced alongside an update to the 1996 residential layout guidelines, which EDC understand is proposed via the Borough Council's emerging Development Management Policies Plan. Without a holistic approach to these interconnected matters we consider there is a risk of conflicting adopted planning guidance due to the age of the current residential layout guidelines.					Comments noted - this would stray into policy making and cannot be achieved through an SPD
	9.3 - Some properties have a pitched main roof with a flat roof over a very small part. To avoid giving the impression a flat roof would be acceptable in that instance we would suggest the words in brackets at end of the paragraph being phrased as 'unless the original house main roof is flat'.					Comments noted - change made
	9.5 – Text could be added to advise that the overshadowing impact would be greater if the neighbouring property is located to the north of the proposed extension. The image next to this paragraph with a tick doesn't show what the proposed extension is.					Comments noted - change made
	9.6 - The images relating to this section need to be next to it rather than on the following page, which perhaps could be achieved through use of less text and/or portrait orientation for the document.					Comments noted - change made
	9.7 – There are no images to explain what is meant by overbearing and how this differs from overshadowing.					Comments noted - change made
	9.10 and 9.11 – The image next to this needs an annotation to clarify what in the image is acceptable as the 2-storey extension shown could be unacceptable for other reasons.					Comments noted - change made
	10.1 – This could reference conservatories, where these do not fall within permitted development rights (or the rights have been removed), as being covered by same guidelines as single storey extensions.					Comments noted - change made
	10.2, 10.3, 10.4 and 10.5 – In absence of an update to the residential layout guidelines, references to adequate garden area could refer back to paragraph 9.10 as definition for this. Minimum separation distances from windows of facing properties are missing.					Comments noted - this would stray into policy making and cannot be achieved through an SPD
10.3 – There are no images for 2-storey rear extensions which have more issues. EDC consider that the guidance should also strongly emphasise that 2-storey rear extensions to terraced properties would generally be unacceptable. We are keen to have consistency of design requirements across the Garden City and the preamble to Dartford Borough Council's Development Policies Plan policy DP7 - Borough Housing Stock and Residential Amenity, provides guidance that 2 storey extensions to terraced properties would generally not be permitted.					Comments noted - this would stray into policy making and cannot be achieved through an SPD	

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	Paragraph 10.3 also states that it covers first floor extensions but provides no specific guidance on these. EDC would question whether they are sufficiently common alterations in Gravesham that need to be covered in the SPD.					Comments noted - however they do not require any specific changes to the draft SPD
	10.4 and 10.5 - Extensions being no greater than half width of the original house is the same restriction as for permitted development and so there seems no advantage to applying this. EDC consider that the guidance would be better aimed at managing wider extensions that would need planning permission, for example extensions on some narrow properties that would exceed half width but still be modest and acceptable.					Comments noted - however they do not require any specific changes to the draft SPD
	10.5 - The annotation below the middle image could clarify that the example is also unacceptable due to the extension having a flat roof, and/or have this image next to paragraph 9.3.					Comments noted - change made
	10.7 – EDC consider this paragraph should be stronger in discouraging all but very minor front extension works and clarify the minimum dimensions for adequate parking spaces, cross referring to paragraph 10.21					Comments noted - change made
	10.8 and 10.9 – This states that the height should be no higher than the existing ridgeline. EDC provided informal comments previously that we consider this should instead refer to being lower or down from the ridgeline, which would additionally provide consistency with Dartford Borough Council design guidance.					Comments noted - change made
	10.17 and 10.18 - No guidance has been provided on conversion of internal garages and whether this would be resisted due to loss of parking.					Comments noted - no change required
	10.21 – This could provide some example images of well-designed front gardens with additional planting and emphasise that any planting lost would need to be off-set by additional planting or more structural planting within a smaller area, to maintain both the character and quality public realm of the area, particularly for new build estates.					Comments noted - no change required, this will be addressed via the biodiversity net gain
	Appendix 1 - Examples for the 25 and 45 degree rules are unchanged from the earlier draft and. EDC do not consider these are sufficiently clear and that this appendix needs both acceptable and unacceptable examples to be shown, including for 2 storey extensions, and that the two rules should be shown as separate examples to avoid confusion. The 45 degree rule should also reference that if the application property is between two neighbouring properties, that this rule applies to both.					Comments noted - change made