



Delegated Report

Householder Planning Application

Planning Application No: 20251112

Location: 1 Rose Cottages Town Road Cliffe Woods Rochester

Description: Erection of a single storey residential annexe for ancillary use to the main dwelling.

Applicant: Mr Mark Welford

Site Visit Date: 12 February 2026

Submitted Documents/Plans

Householder Application for Planning Permission form;
Drawing no. 023-110/002 Rev. B Existing elevations and section;
Drawing no. 023-110/003 Rev. B Existing ground floor layout;
Existing first floor layout received 08 April 2026;
Drawing no. 025-007/001 Rev. C Site location, existing and proposed block plans;
Drawing no. 025-007/005 Rev. B Proposed elevations and section;
Drawing no. 0253007/006 Rev. B Proposed ground floor layout;
Drawing no. 025-007/007 Rev. B Proposed first floor layout;
Drawing no. 025-007/008 Rev. B Proposed site plan with parking layout;
Drawing no. 025-007/009 Rev. C Proposed site plan;
Email from the agent received 03 February 2026; and
Email from the agent received 06 April 2026.

Superseded Documents/Plans

~~Drawing no. 023-110/002 Rev. A Existing elevations and section;~~
~~Drawing no. 023-110/003 Rev. A Existing ground floor layout received 04 November 2025;~~
~~Drawing no. 023-110/003 Rev. A Existing ground floor layout received 26 January 2026;~~
~~Existing first floor layout received 04 November 2025;~~
~~Drawing no. 025-007/001 Rev. A Site location, existing and proposed block plans;~~
~~Drawing no. 025-007/005 Rev. A Proposed elevations and section;~~
~~Drawing no. 0253007/006 Rev. A Proposed ground floor layout received 04 November 2025;~~
~~Drawing no. 0253007/006 Rev. A Proposed ground floor layout received 26 January 2026;~~
~~Drawing no. 025-007/007 Rev. A Proposed first floor layout;~~
~~Drawing no. 025-007/008 Rev. A Proposed site plan with parking layout; and~~
~~Drawing no. 025-007/009 Rev. A Proposed site plan;~~

Procedural Issues

Following a request from the case officer, the applicant provided amended plans which corrected inaccuracies regarding the existing single storey rear extension and provided further details of the layout/use of the application site.

Relevant Planning History

Reference	Description	Decision	Decision Date
20250483	Construction of new self build chalet bungalow on land adjacent to 1 Rose Cottages, Town Road, Cliffe Woods.	Refused	17.09.2025

Development Plan

Gravesham Local Plan Core Strategy (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

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 13 – Protecting Green Belt land
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 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)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

KCC Heritage Conservation (E & W) (Archaeology)

In this instance I suggest that no archaeological measures are required.

Chief Planning Officer Medway Council

Medway Council raises no objection to the consultation under Article 18 of the Town and Country Planning (Development Management Procedure (England) Order 2015 on the basis that the proposal by virtue of its design and scale, is considered acceptable and would not be harmful to the amenity of Medway residents._

Southern Gas Networks

Thank you for your enquiry, there is a high pressure pipeline in the vicinity of your works. Your proposals would require the exact location of this pipeline and other SGN assets to be located before any work commences, either by electronic detection or by hand excavated trial holes as specified in the attached SW/2 document. These works must be supervised by an SGN representative, please contact [redacted] to arrange a pre-works site visit and any future supervision. We would like to reiterate that no works should be carried out within the vicinity of a high pressure pipeline until consultation with an SGN representative has occurred. We thank you for your patience at this time

Please note that no mechanical excavations are permitted within 3m of the pipeline at any time.

This pipeline is registered with the Health and Safety Executive as a Major Accident Hazard Pipeline.

SGN High Pressure Gas Pipelines in the vicinity of your works		
Pipeline Number	Pressure Regime	Building Proximity Distance (Zone 1)
GM20	HP	9.0
GM03	HP	3.0

This table does not include SGN's low medium and intermediate pressure assets, which may be in the vicinity.

Building Proximity Distance:

The building proximity distance (Zone 1) for the pipeline is shown in the table above for all our high pressure gas pipelines in the vicinity of your works. This should not however be confused with the HSE consultation zones 2 & 3 which will be considerably greater, further guidance of the requirements can be found in HSE Document: PADHI: HSE's Land Use Planning Methodology. Zone 1 is a safety factor with reference to habitable buildings as recommended by IGE TD/1. It is calculated from the diameter, material, wall thickness and pressure of the particular pipeline. Under Pipeline Safety Regulations 1996 this distance is declared to the HSE. Any intrusion within this safety zone will not be taken lightly and any intention to proceed should be accompanied by a risk assessment or provision of other supporting evidence, especially in the event of any legal proceedings at a later date.

Vehicle Crossing:

Vehicle crossings over the pipeline must be kept to a minimum and must cross at 90 degrees. The crossing will require agreement with SGN and may require design and calculations, as evidence to prove there is minimal added stress to the pipeline. Method statements must be agreed before works commence.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW/2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence. Further guidance / restrictions are detailed below:

1. No mechanical excavation is allowed within 3 metres either side of pipeline.
2. No plant or storage of equipment shall be made within any easement strip.
3. If any metallic pipes or cables are being laid in proximity to gas pipelines then interference testing will be required, the cost of which to be borne by the promoter of the works. A minimum clearance of 600mm is required.
4. All precautions stated in publication SGN/WI/SW/2 (Safe Working in the Vicinity of High Pressure Gas Pipelines) shall be fully complied with in all respects. Acceptance of SGN/WI/SW/2 shall be acknowledged by the responsible site person signing and returning the form Appendix A (back page) to the SGN representative contacted in (7).
5. No thrust boring shall take place within 3 meters of the pipeline.
6. All planting within the easement strip should comply with 'Notes for Guidance on Tree Proximity'.
7. Before commencing work on site you must contact our Pipeline Maintenance Section on the number above at least seven days before work commences. A Southern Gas Networks representative will then contact you to arrange to visit site. Details of working near to high-pressure gas pipelines can then be discussed.
8. Pipeline sections that are planned and agreed by SGN to be permanently covered (i.e. by road surface) will require a coating survey. SGN will repair any indicated coating defects free of charge. The survey costs will be borne by the promoter of the works. Prior to any surface cover cathodic protection coupons and reference cells will require installation at no cost to SGN.
9. This pipeline is cathodically protected and as such has test cables located in test posts, were these to be lost through this work we would look to you for remedial action at no cost to SGN.
10. Intrusive construction methods will require an agreed method statement prior to work starting.
11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.
12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or

boreholing must take place within 3 metres of the pipeline.

Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.

Please note that further restrictions on activities may need to be imposed as a result of a site inspection.

Map extracts:



Southern Water

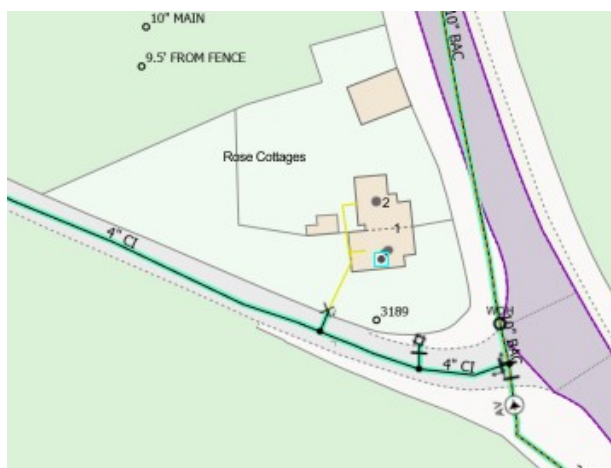
Southern Water has determined that the flow rate for the above site will remain consistent, so capacity is not an issue, and no Southern Water assets will be affected. Therefore, Southern Water has no objections to this proposal.

Please note surface water should not be disposed of into a public foul sewer and must comply with the Hierarchy of H3 of the Building Regulations. For more details, refer to the Drainage and Waste Disposal: Approved Document H on the GOV.UK website.

Any new connections to the public sewerage system will require a New Sewer Connection application (also known as a Section 106) to be submitted and approved by Southern Water.

Due to legislative changes effective from 1st October 2011 regarding the ownership of sewers, it is possible that some previously private sewers, now deemed public, could be crossing the above property and may not be shown on Southern Water records. Therefore, if any additional sewers are discovered during construction, an investigation will be required to determine their condition, the number of properties served, and potential access methods before any further work can proceed on site.

Map extracts:



Controllable Valve			Flow Control			Inlet-Outfall	
Manhole							
Outfall Headworks		Overflow Chamber		Pipe Bridge		Pumping Station	
Sewer Level Monitor		Storage		Treatment Works		Weir	
Wastewater Pipe				Wastewater Use		Developer Services	

- Drainage for the application property and no. 2 Rose Cottage is via a cesspit (located at no. 2) which regularly blocks. The cesspit does not have capacity to handle waste from an additional dwelling and an alternative drainage solution will need to be considered.
- Adverse impacts to residential amenity from loss of privacy, increased noise and overshadowing.
- Cliffe has drainage and surface water management issues, the proposal could worsen these, increasing the risk of flooding.
- If approved, the proposal would set a concerning precedent for further infill or back garden developments, eroding local character and putting pressure on infrastructure and services.

Officer's Analysis

Proposed Amendments to the NPPF 2024

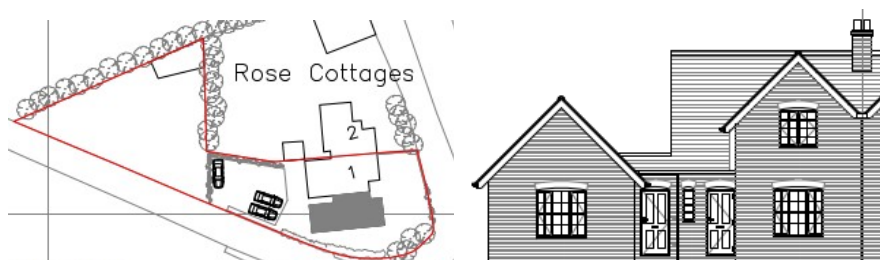
On 16 December 2025, the government published a consultation on proposed reforms to the National Planning Policy Framework 2024 (NPPF 2024) and whilst broad changes are proposed, these could be subject to further amendment and therefore they carry very limited weight at this stage. It is noted that, with regard to the relevant issues in the determination of this application, the proposed amended framework has a broadly consistent approach to that set out in the NPPF 2024. As such, and due to the limited weight of the amended framework, the proposed development has been assessed with reference to the NPPF 2024 only.

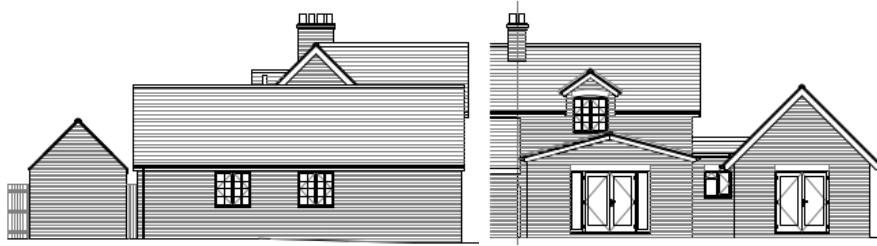
Background and Proposal

Planning permission was refused for the construction of a new self-build chalet bungalow on land adjacent to no. 1 Rose Cottages in September 2025 (reference 20250483) on Green Belt, design, residential amenity, highway safety and ecological grounds. Extracts from the submitted drawings for 20250483 follow;



The current proposal seeks the erection of a single storey residential annex. Extracts from the submitted drawings follow;





In an email from the agent received 03 February 2026, the following explanation of the proposal has been provided;

- *Our client would like the annex extension to be considered part of his existing dwelling, but it must also be considered as an annex for his family who will inhabit the area for their own use. The annex will house his daughter and grandchild in their own space with bedrooms, kitchen, bathroom and sitting room, to allow for separate living away from the main property, However the annex will be accessible to the main house for family use as a whole. They want to produce a family dwelling that will allow some separation for alone time and separation to prevent the feeling of overcrowding and personal privacy. To sum up the enlarged dwelling will allow for full family use when desired and for separation when required for personal privacy.*
- *The gas and electricity will initially be combined for the house and the annex. This may change in the near future again for separation of costs between parents and family use.*
- *Garden will be a shared space for all family use.*
- *Parking will be combined for all family use, off road, in rear garden.*

Green Belt

The application site is located in the Green Belt and as such, paragraphs 142 and 143 and 153-160 of the NPPF 2024 and Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 are most relevant.

Policy CS02 of the Gravesham Local Plan Core Strategy (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.

Paragraph 142 of the NPPF 2024 sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 143 lists five purposes that the Green Belt serves.

Paragraph 153 of the NPPF 2024 states;

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Footnote ⁵⁵ reads as follows:

⁵⁵ Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.

Therefore, in the following assessment, substantial weight will be given to any harm to the Green Belt (including its openness) unless the development is not inappropriate development.

Paragraphs 154 and 155 of the NPPF 2024 set out the circumstances in which new built development can be considered as not inappropriate in the Green Belt. In this instance, paragraphs 154(c) and 155 are most relevant and read as follows;

154(c) 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;

155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

Saved Policy C13 of the Gravesham Local Plan First Review (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 2024, 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 2024.

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 2024 and should be afforded weight.

In this regard, reference to an appeal decision at no. 42 Beechwood Drive (reference APP/K2230/D/23/3326603 dated 13 February 2024) is relevant, here the Inspector stated that;

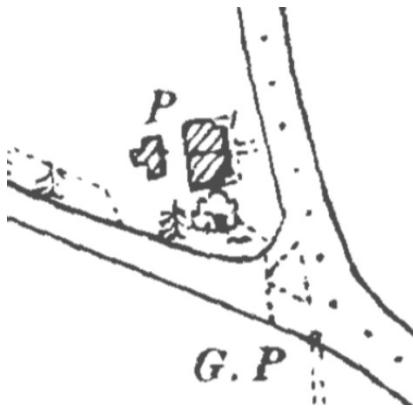
"The GLPFR pre-dates the Framework's publication and, through applying restraint upon development in the Green Belt, Saved Policy C13 appears broadly consistent with the Framework and thus should be afforded considerable weight."

Therefore, it is considered that Saved Policy C13 of the Gravesham Local Plan First Review (1994) is relevant to the determination of this application.

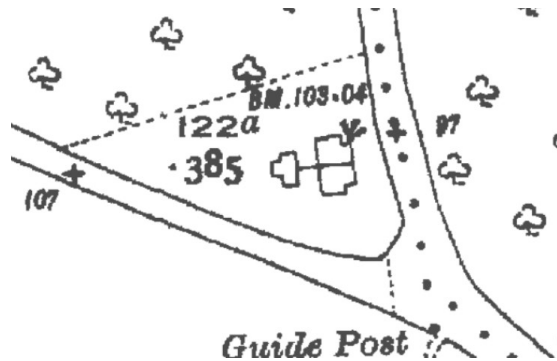
Whether the proposed development complies with the requirements of paragraphs 154(c) and 155 of the NPPF 2024 and Policies CS02 of the Gravesham Local Plan Core Strategy (2014) and Policy C13 of the Gravesham Local Plan First Review (1994) will be considered in the following sections.

Paragraph 154(c) - 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;

The original building, for the purposes of assessing whether the proposed development is a disproportionate addition or not, has been in place for many years. There is no planning permission for the building but according to historical maps, it was constructed between 1890 and 1897. The historical OS maps for 1897-1900 and 1929-1952 illustrate an original footprint as follows;



KLIS Map extract 1897-1900



KLIS Map extract 1929-1952

The floor area of the original building was some 74.6 square metres, it had a height of some 6.7 metres and was a modest, two storey dwelling, with a gable roof and an L-shaped footprint. At some point after 1952, it is noted that a single storey rear projection appears to have been added to the original building. This had a floor area of some 3.5 square metres and is shown below;



Extract from OS plan circa 2002



Google Map image October 2009

Recently (within the last two years according to the applicant), a single storey rear extension was added to the building, which had a footprint of some 22.8 square metres. It is noted that the rear projection shown above was removed as part of this development. The resulting increase in floor area above the original building was some 22.8 square metres or 31%.



Google Map image 2026



Google Map image October 2024

The rear extension works appear to have included the removal of an original outbuilding.

The proposed development would add a single storey residential annexe that would be linked to the main

dwelling by a 1.3 metre wide hallway. The floor area of the proposed annexe would be some 56.3 square metres and it would have a height of some 5.3 metres (to the ridge). The extension would result in an increase in floor area, above the original building, of some 76%.

Cumulatively, the existing single storey extension and the proposed annexe would increase the floor area of the building by some 79.1 square metres or 106% above the original. This would significantly exceed the one third limit set out in Saved Policy C13 of the Gravesham Local Plan First Review (1994).

It is acknowledged that floorspace is only one measure of whether the extension would be a disproportionate addition to the building and in coming to a conclusion on this issue, regard must be had to a range of other factors including footprint, floorspace, volume, scale, mass and height.

In terms of bulk and massing, it is considered that the proposed development would add significantly to the appearance of the building, because the extension would extend well beyond the rear wall of the original building and would substantially elongate the property to the side. Indeed, the total width of the proposed extension (5.8 metres) would be similar to the total width of the original building (5.9 metres). With a tall gable end roof and a height of 5.3 metres and a footprint that would not be subservient to the existing building, the proposal would have the appearance of a separate dwelling. Due to the roof height, the proposal would be visible above the hedge on the side boundary of the application site from Town Road, Lower Rochester Rd and from the footpath located to the south/south west (reference NS134). All these factors mean that the proposal would add significant volume, bulk, scale and mass to the application property.

It is noted that an original outbuilding at the application site has been removed, which arguably has offset some of the loss of openness associated with the erection of the existing rear extension. Therefore, the loss of the outbuilding, cannot be balanced against the increase in built development that is currently proposed.

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 (2014), Saved Policy C13 of the Gravesham Local Plan First Review (1994) and paragraph 154(c) of the NPPF 2024.

Paragraph 155(a) – would the development utilise grey belt land and not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

Grey belt is defined in the NPPF 2024 as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; or preserving the setting and special character of historic towns (paragraphs 143(a), (b) and (d) of the NPPF 2024).

The application site meets the definition of grey belt. Whilst the proposal would be contrary to one of the purposes that the Green Belt serves, namely safeguarding the countryside from encroachment, it would not fundamentally undermine all the purposes (as set out in paragraph 143 of the NPPF 2024) when taken together. As such, the proposal would be in line with paragraph 155(a) of the NPPF 2024.

Paragraph 155(b) – is there is a demonstrable unmet need for the type of development proposed?

The proposed development would provide a residential annex to be occupied by the applicant's daughter and grandchild. Whilst the applicant has identified a specific requirement to provide accommodation for his family, this is a personal choice and not a demonstrable unmet need for the proposal. This is because alternative suitable two bedroom accommodation or dwellings with residential annexes are available in the local area. As such, the proposal would not be in line with paragraph 155(b) of the NPPF 2024.

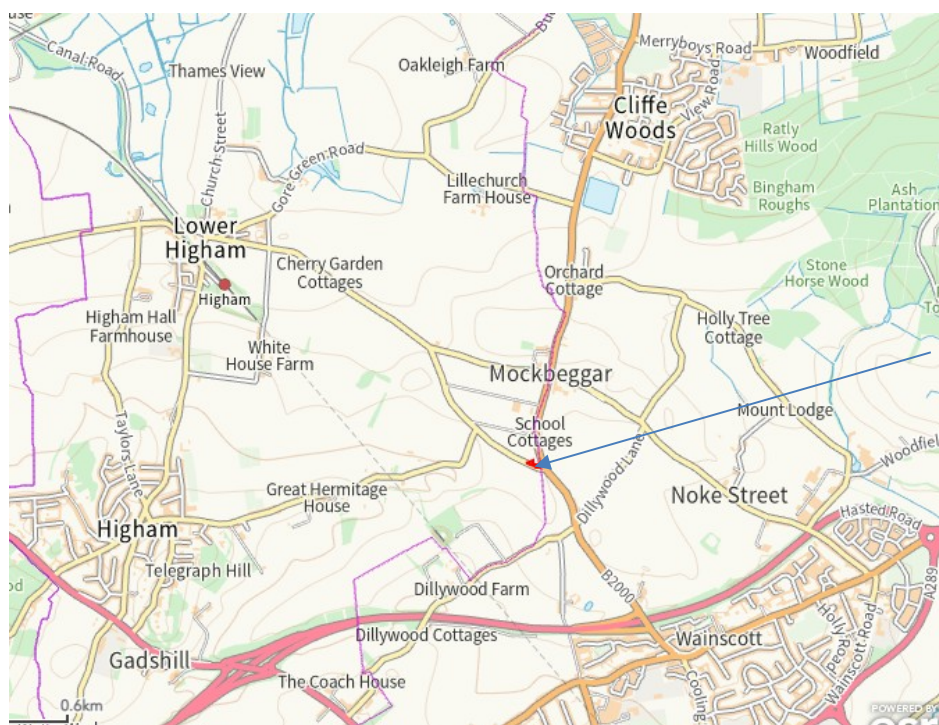
Paragraph 155(c) – would the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework?



Paragraph 110 of the NPPF 2024 sets out the planning system should actively manage patterns of growth in support of the transport objectives set out in paragraph 109 (broadly that transport issues are considered at the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places). Paragraph 110 also states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. It highlights that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and that this should be taken into account in both plan-making and decision-making.

Paragraph 115 of the NPPF 2024 sets out that development should prioritise sustainable transport nodes; that safe and suitable access to development sites should be achieved by all users; that transport design should reflect national guidance; and that any significant impacts on the transport network (in terms of capacity and congestion) or on highway safety are to be mitigated cost effectively.

The application site is located in the open countryside, significantly outside of any settlement;



The application site is identified by an arrow

The closest settlements are Higham (a village with a local centre), Lower Higham (a village with no local centre), Cliffe Woods (a village with a local centre) and Wainscott (a village/edge of urban area with a local centre). The application site is 1.7 kilometres to the south east of lower Higham, 1.7 kilometres to the north east of Higham, 1.6 kilometres to the south of Cliffe Woods and 1 kilometre to the north west of Wainscott.

The site sits on the junction of the B2000 (Town Road) and Lower Rochester Road. The B2000 is a B class road, which is heavily trafficked and has a speed limit of 40 miles per hour. Lower Rochester Road is a narrow, country lane subject to the national speed limit. There is no footpath (NB a footpath ceases after Bunters Hill Road) for the majority of the journey from the application site to Cliffe Woods along the B2000 and the road is unlit. For the journey to Wainscott along the B2000, there is a footpath but the majority of route is unlit. For the journeys to both Lower Higham and Higham (along Lower Rochester Road and Hermitage Road), there is no footpath, the roads are narrow and rural and are unlit. As such, these routes are not conducive to either walking or cycling.

There are bus stops on the B2000, located to the south some 0.4 kilometres away (with services to Wainscott and Rochester) and to the north, some 0.6 kilometres away (with services to Cliffe, Cliffe Woods, Wainscott and Gravesend) but the services are limited and often confined only to school start and end

times.

Overall, the application site is located in an isolated location and because there are little or no pedestrian footways or street lighting near to the site, because the available bus services are limited and because the distance from services and the absence of nearby infrastructure would severely limit travel choice, the occupants of the proposed annexe would be entirely dependent on use of a private motor vehicle to meet their day-to-day needs. For these reasons, the proposal would not be in a sustainable location and as such, it would be contrary to paragraph 155(c) of the NPPF 2024.

Paragraph 155(d) - where applicable, does the development proposed meet the 'Golden Rules' requirements?

Paragraph 155(d) of the NPPF 2024 is not applicable because the proposal does not constitute major housing development.

According to paragraph 155 of the NPPF 2024, all four criteria must be met in order for a proposal to not be regarded as inappropriate development. Therefore, because the proposal would not fulfil an unmet need and would not be located in a sustainable location, it would be contrary to paragraphs 155(b) and 155(c) of the NPPF 2024 and be considered inappropriate development in the Green Belt.

Lastly, paragraph 154(g) of the NPPF 2024 sets out another circumstance in which new built development can be considered as not inappropriate in the Green Belt. It reads as follows;

154(g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

It should be noted that as a householder application for an extension to an existing dwelling, paragraph 154(c) of the NPPF 2024 is considered most relevant and has been extensively discussed above. Therefore paragraph 154(g) is not relevant to this proposal. However, notwithstanding this, the following paragraphs (which consider the impact of the proposal on the openness of the Green Belt) will illustrate that even if paragraph 154(g) was considered relevant, then the proposal would not comply with it (because the proposal would cause substantial harm to openness). Therefore, the proposal constitutes inappropriate development.

Impact on the openness of the Green Belt

The openness of the Green Belt has both spatial and visual aspects, and any new built form of development is harmful to its open character. The Courts have identified a number of factors to be taken into account when assessing the impact of a proposed development on the openness of the Green Belt (PPG Paragraph: 013 Reference ID: 64-013-20250225), which include both spatial and visual considerations, as well as duration and remediability of the development and the degree of activity likely to be generated, such as traffic movement.

The proposal seeks to construct a residential annexe within the side garden of the application site. Both spatially and visually, the erection of the annexe on an open corner plot would have a harmful, eroding impact on the openness of the Green Belt. This would be due to the current lack of built form on the corner, which would be replaced with a 5.3 metre, tall extension, with a 56.3 square metre footprint. It is noted that there are long distance views of the application site to the east, on Town Road, views from the south on Lower Rochester Road and from the south/south west from footpath NS134. Two of these views are illustrated below (case officer's photographs 12 February 2026);



Whilst the existing hedge at the application site would reduce some of the visual impacts of the proposed development, by virtue of the elevated location and extent of built development, there would still be substantial harm to both the spatial and visual openness of the Green Belt.

Overall, with regard to the Green Belt, the proposed development would be a disproportionate addition to the original building, it would encroach over the countryside and cause substantial harm to both the spatial and visual openness of the Green Belt. Furthermore, the application site is situated in an unsustainable location and the proposal would not fulfil a demonstrable unmet need. As such, the proposal would be inappropriate development in the Green Belt and contrary to section 13 of the NPPF 2024, to Policy CS02 of the Gravesham Local Plan Core Strategy (2014) and to Saved Policy C13 of the Gravesham Local Plan First Review (1994).

Very special circumstances

Referring to paragraph 153 of the NPPF 2024, 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 submitted application details do not identify any very special circumstances and there are no other justifications for the proposal, that would amount to the very special circumstances that would set aside the objection to the development on the grounds of being inappropriate development in the Green Belt.

Principle of a Residential Annex

Residential annexes are an increasingly common form of development that are normally proposed in order to allow relatives to live with their family but to retain some degree of independence. To remain ancillary accommodation and not be considered as a separate unit of accommodation, the use of annexe must be closely tied to the main dwelling.

The proposed development would provide residential accommodation in a single storey extension located in the side garden of the application property. The residential annexe would incorporate a kitchen/living room, bathroom and two bedrooms and would be occupied by the applicant's daughter and grandchild. The annexe would share access, services, a garden and living activities with the occupiers of the main dwelling. Therefore, there would be a familial and functional relationship between the occupiers of the annexe and the main house and the proposal would not constitute a separate residential unit.

Overall, provided that any planning permission granted was conditioned to ensure that the residential annexe remains linked to the main dwelling and that no separate garden or curtilage area can be created in future, then the proposal would be acceptable in principle.

The following sections will assess the detailed design, amenity and highways impacts of the proposal.

Design, Character and Appearance

Paragraph 135 of the National Planning Policy Framework 2024 (NPPF 2024) sets out various design requirements and includes the need for the development to add to the overall quality of an area; be visually attractive; and be sympathetic to local character, including the surrounding built environment. Paragraph 139 of the NPPF 2024 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 sets out that new development will be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the built environment and take account of the scale, height, building lines and other architectural features of buildings. Account should also be taken of strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.

In relation to side extensions, the Householder Extensions/Alterations Design Guide (2021) sets out that care is needed when considering the relationship between the proposal and the boundary with the neighbouring property, as the separation between properties can provide access routes to the rear of the property and in some locations be part of the character of the area. In addition, side extensions should appear subservient to the original building; be no greater than half the width of the original building; incorporate roof designs to reflect the main roof; and window designs and proportions to reflect those existing and local character.

The application site is located in the Higham Arable Farmlands Landscape Character Area (LCA) and as such, Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications. In relation to the Higham Arable Farmlands LCA, this document states that the overall condition of the landscape is poor and that it has moderate sensitivity. It recommends that the key landscape elements in poor condition should be restored and that the whole area should be safeguarded as a prominent landscape feature in the wider landscape.

The application property is located on a prominent corner, raised up from the adjacent roadway. It is a relatively small dwelling set within sizable grounds and as such, it has a spacious appearance, with greenery providing a pleasant softening break between the edge of the plot and the built development on site.

Whilst the design approach and materials would match with the existing building, the proposed

development would introduce a large, single storey extension into the side garden of the application property. The proposal would undermine the spacious character of the plot and result in a cramped, more urban appearance. The extension would have a width that significantly exceeds half of the width of the existing building and it would have a depth that significantly exceeds the original rear elevation. As such, the proposed footprint would not be subservient to the existing building.

Overall, by virtue of its size, bulk, design and the loss of open land, the proposed development 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 Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (2014), to Paragraph 135 of the NPPF 2024 and to the Householder Extensions/Alterations Design Guide 2023.

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. In this regard, the Nationally Described Space Standards (NDSS) and the Borough Council's adopted Residential Layout Guidelines (RLG) are relevant.

The proposal would provide living accommodation in the form of a two bedroom, three person, single storey annexe. The NDSS requires residential accommodation to provide a minimum total floor area of 61 square metres but the proposal would only provide 49 square metres. Although it is noted that the proposed bedrooms would exceed the minimum floor area requirements for a single and double bedroom in the NDSS and the occupants would have access to the facilities/rooms within the main dwelling. Therefore, despite the shortfall in total floor area, the proposed annexe would provide an acceptable standard of living for future occupants.

The proposed development would result in a significant reduction in the size of the side garden at the application site. However, as the area to the rear of the building would remain usable for amenity purposes and this would exceed the minimum size requirements set out in the RLG, then there would be no significant detriment to residential amenity.

It is noted that the proposal would result in the loss of hallway and w.c. windows in the side elevation of the application property, thereby reducing the levels of natural light available in these rooms. However, due to these room uses being non-habitable, there would be no significant detriment to the living conditions of future occupants.

As such, the proposal would not be detrimental to the amenity of future occupants and would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014) and the Residential Layout Guidelines (June 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 occupants and to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.

Due to the design of the proposed development and to the design, layout and orientation of surrounding properties, there would be no adverse overlooking, overshadowing or overbearing impacts to any of the surrounding residential occupants.

The proposed development would increase the number of occupants at the application property, but no new dwelling would be created. In light of this, any increase in noise/disturbance associated with the proposal would not be significantly greater than the existing situation.

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 (2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review (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.

As a four or more bedroom property, the adopted Vehicle Parking Standards require a maximum provision of three parking spaces at the site.

The application property has two bedrooms and on-site parking for at least three vehicles. As a residential annexe, the proposal would not result in a significant increase in vehicle movements. The proposed development would essentially result in the building increasing from three to five bedrooms, with no alteration to the existing parking or access arrangements.

Overall, it is considered that the proposal would not be detrimental to highway safety and would make sufficient provision for the parking of cars within the site, in accordance with the Borough Council's adopted Vehicle Parking Standards. As such, the proposed development 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.

Any Other Material Planning Considerations

The application site is located in an area of multi-period archaeological potential and high palaeolithic potential but KCC Heritage has advised that no archaeological measures are required. As such, the proposal would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policy TC7 of the Gravesham Local Plan First Review November 1994.

The application site is located within Groundwater Source Protection Zone 3 and a gas pipeline affects the front garden area. However, as the proposed development would be within the confines of an existing residential garden and only a relatively small amount of groundworks would occur, then it is considered that there would be no adverse impacts to groundwater. The applicant should be made aware of the comments from Southern Gas Networks relating to the gas pipeline via an informative on any planning permission granted.

The Dickens' Country Protection Society has suggested that the proposed annexe could be used as a separate dwelling and suggests that if consent is granted, conditions are imposed to restrict the occupation to family members and control the disposal of the annex separate to the main house. Due to the lack of any internal access between the application property and the proposed annexe and due to the inclusion of a separate front door, it is acknowledged that there would be a high likelihood that the annexe could become separated from the main dwelling. Furthermore, the previously refused planning application at the application site was for a separate dwelling. However, the application must be determined on the basis of the current submission, i.e. as an annexe and appropriate conditions can be attached to any planning permission granted to ensure that a separate dwelling is not formed. As such, the Dickens' Country Protection Society's concerns can be adequately addressed.

Local residents have raised a number of concerns, the majority of which have been covered in the above discussion. The outstanding issues are summarised (in italics) and commented on as follows;

- *Drainage via a cesspit (located at no. 2) which regularly blocks and Cliffe has drainage and surface water management issues, the proposal could worsen these, increasing the risk of flooding* – Southern Water has set out that the flow rate for the application site will remain consistent, so capacity is not an issue and they have not raised an objection to the proposal. STG Building Control have confirmed that the cesspit must be of adequate capacity. It is noted that details of the surface water and foul drainage would be considered under the Building Regulations process,

therefore there are no planning reasons that would justify refusing the application on drainage grounds. The applicant has been made aware of the cesspit issue and this can also be the subject of an informative on any planning permission granted.

- *If approved, the proposal would set a concerning precedent for further infill or back garden developments, eroding local character and putting pressure on infrastructure and services* – Every planning application is determined on its own merits and precedent can only be set in very limited circumstances. As an annexe, the proposal would not put additional pressure on local infrastructure or services. The above discussion covers local character impacts.

It is noted that Medway Council have raised no objection to the proposed development.

Conclusion

The proposed development would have no adverse residential amenity, highways, groundwater or archaeological impacts and the proposed external facing materials and general design approach would match existing. All of which weigh in support of the proposal. However, the proposed development would be inappropriate development in the Green Belt, by virtue of it being a disproportionate addition to the original building, because it would encroach over the countryside and because it would cause substantial harm to both the spatial and visual openness of the Green Belt. In addition, the application site is situated in an unsustainable location and the proposal would not fulfil a demonstrable unmet need. Furthermore, in relation to design, the proposal would not be subservient to the existing dwelling in terms of footprint and would be an overdevelopment of the application site, which would be detrimental to the character and appearance of the surrounding area.

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.

Recommendation

That planning permission should be refused on the following grounds;

1. The proposed development would be a disproportionate addition to the original building, it would encroach over the countryside and cause substantial harm to both the spatial and visual openness of the Green Belt. Furthermore, the application site is situated in an unsustainable location and the proposal would not fulfil a demonstrable unmet need. As such, the proposal would be inappropriate development in the Green Belt. No very special circumstances would justify setting aside the objection to the proposal on the grounds of being inappropriate development in the Green Belt and the proposal would therefore be contrary to section 13 of the National Planning Policy Framework 2024, to Policy CS02 of the Gravesham Local Plan Core Strategy (2014) and to Saved Policy C13 of the Gravesham Local Plan First Review (1994).
2. By virtue of its size, bulk, design and the loss of open land, the proposed development would not be subservient to the footprint of 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 and be detrimental to the visual amenities of the street scene. As such, the proposal would be contrary to Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (2014), to Paragraph 135 of the National Planning Policy Framework 2024 and to the Householder Extensions/Alterations Design Guide 2023.

(For informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Mrs Faye Walsh
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Signed:	K Joyce	Signed:	Jusabk
Dated:	08th May 2026	Dated:	15 May 2026