

Planning, Design and Access and Heritage Statement

Mill House
Hermitage Road
Higham, Rochester
Kent ME3 7ND

April 2026

Ref: 1055

1.0 INTRODUCTION

- 1.1 Planning permission and listed building consent were been refused for the demolition of a rear sun room and erection of a single storey rear extension with roof light, under application references 20250602 (householder application) and 20250603 (listed building consent) for the following reasons:

20250602 (householder application)

1. The proposed extension and previous additions to the dwelling are disproportionate to the original property and have a cumulative harmful impact and are inappropriate development within the Green Belt. Therefore, the development hereby proposed is contrary to Policies CS02 (Scale & Distribution of Development) and CS19 (Development and Design Principles) of Gravesham's Local Plan Core Strategy (2014), saved Policy C13 (Extensions to Dwellings in the Countryside) of Gravesham Local Plan First Review (1994) as well as Section 13 of the National Planning Policy Framework (2024).

2. The proposed extension would cause harm to the setting of the Listed Building and its historic character, by virtue of its scale and loss of original features which fail to ensure the preservation of its existing historic fabric. Therefore, the proposal is contrary to saved policy TC2 of the Gravesham Local Plan First Review (1994), Policy CS20 of the Gravesham Local Plan Core Strategy (2014) and Section 16 of the National Planning Policy Framework (2024).

20250603 listed building consent

1. The proposed extension would cause harm to the setting of the Listed Building and its historic character, by virtue of its scale and loss of original features which fail to ensure the preservation of its existing historic fabric. Therefore, the proposal is contrary to saved policy TC2 of the Gravesham Local Plan First Review (1994), Policy CS20 of the Gravesham Local Plan Core Strategy (2014) and Section 16 of the National Planning Policy Framework (2024).

- 1.2 This application for planning permission and listed building consent for the same proposal is submitted as the window to appeal the refusals has been missed. Additional information to support the proposal

is contained in this report, including a case for very special circumstances and additional background to the historic evolution of the building in relation to fenestration.

2.0 RELEVANT PLANNING HISTORY

2.1 As set out above

3.0 POLICY FRAMEWORK

3.1 Government Policy and Guidance is to be found in the NPPF and the NPPG. Heritage matters are also dictated through Sections 66, 71 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.2 Gravesham Local Plan Core Strategy

CS01 – Sustainable Development

CS02 – Scale and Distribution of Development

CS12 – Green Infrastructure

CS18 – Climate Change

CS19 – Design and Development Principles

CS20 – Heritage and the Historic Environment

3.3 Gravesham Local Plan first review - 1994

C13 – Extensions to Dwellings in the Countryside

P3 – Vehicle Parking Standards

3.4 Supplementary Planning Guidance

SPG 2 – Residential layout guidelines including Housing Standards Policy Statement

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)

4.0 ASSESSMENT

- 4.1 The application site, Mill House is an end of terrace property, forming part of a Grade II Listed Building. The listing reads:

‘C18 building probably built by Sir Richard Head about 1760. Restored. It comprises one long range of Mill House, Granary and Cottage, all of 2 storeys with a tiled roof. The Mill House is at the east end. This is stuccoed, has 2 windows, sashes with glazing bars intact and modern porch. The granary in the centre has 4 windows and the cottage at the west end one window. They are both stuccoed on the ground floor and weatherboarded above and have sprocket eaves.’

- 4.2 The property has been extended at the rear and to the side, with a detached triple garage building and an open sided canopy bar to the east of the dwelling. This has changed the proportions and scale of the original structure and introduced a variety of new and original windows to all elevations.
- 4.3 A sun room currently sits to the rear of the structure and the proposal seeks to replace this with a marginally larger extension as shown below:

Rear elevation

Existing



Proposed



Side elevation



Ground floor plan



Green belt impact

- 4.4 As set out in the officer report in consideration of 20250602 and 20250603 (the previous applications), the application site is located in the Green Belt and as such, the NPPF and Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) are relevant.
- 4.5 Paragraph 153 of the National Planning Policy Framework (2024) states that 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, is clearly outweighed by other considerations. One of the exceptions to this is set out in part c of paragraph 154 which states that it may be acceptable to extend or alter a building provided it does not result in disproportionate additions over and above the size of the original building.
- 4.6 The officer report for the previous applications identifies that the proposal will replace an existing extension and that although it is larger than the one it would replace this does not constitute a disproportionate addition and the extension in isolation is considered to be proportionate.
- 4.7 It goes on to consider that the numerical increase when considered alongside other alterations to the dwelling does result in a disproportionate increase and is therefore contrary to the 1994 policy C13.
- 4.8 Turning to the impact of the extension on the openness of the green belt, the officer report for the previous applications concludes that in spatial terms, the overall increase in depth of 0.95m and width of 1.75m, which is off-set by the proposed reduction in the patio size would result in an increase in size of extension but a reduction in the overall spread of development '*which is considered to benefit the spatial openness*'.
- 4.9 The officer report further states that given this, along with the lack of visibility of the extension, it would not have any impact on openness, and '*is not considered to erode the open permanence of the Green Belt.*'

- 4.10 It is proposed in this resubmission that very special circumstances exist which outweigh the harm through reason of appropriateness and any other harm. These very special circumstances are that while the proposal would introduce an extension of an additional 0.95m in depth and 1.75m of width compared with existing lawful arrangement on site, this is set within an existing built envelope and against an existing backdrop of larger built form, would not be visible in any view of the site and would be off-set by the proposed reduction in the patio size. There is no other harm to openness caused by the extension, and in fact as stated in the officer report, there would be an overall improvement as detailed above. These are circumstances specific to the proposal and they outweigh the harm by definition.
- 4.11 It is concluded that the additional dimensions of the extension compared with the existing sunroom are negligible and not disproportionate and there would not be a cumulative harmful impact. Regardless, the proposal would not cause harm to the openness of the greenbelt for the reasons detailed above, and there are very special circumstances, including consideration of the reduction in the overall spread of development on site and the concealed location of the marginally increased size which would not be apparent in any appreciation of the green belt. The proposal would be of spatial benefit to the openness of the green belt. Therefore very special circumstances exist which outweigh the harm through reason of appropriateness and any other harm.

Design and Impact on the Listed Building

- 4.12 Local Plan policy places emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 (LPCS) reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.
- 4.13 Para 212 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether

any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 4.14 Para 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.15 The previous applications considered that harm would be caused to the setting of the Listed Building and its historic character, by virtue of its scale and loss of original features which fail to ensure the preservation of its existing historic fabric.
- 4.16 In the first instance as highlighted above, the scale of the extension is barely larger than the existing rear extension. The conservation officer comments make no objection to size of the extension – only that it entails the removal of one rear ground floor window and it is presumed that this is the objection in scale that is being referred to in the reason.
- 4.17 The proposed extension necessitates the removal of one ground floor window. This is located on the rear elevation which is a firmly subservient elevation and cannot be viewed from any public vantage point and is already hampered by the adjacent sun room. To this end, its removal has a negligible impact on the character or setting of the building.
- 4.18 The window does not contribute to the significance of the building as can be seen in the listing which only makes reference to the appearance of the front elevation in relation to its contribution to the terrace of buildings.
- 4.19 Furthermore the kitchen window at approximately 1.65m wide and 1.1m high and landscape in its format is the only window in that format on the property – it is not representative of any other fenestration and does not form part of character of the building.
- 4.20 The history of the property and the positioning, height and layout of the fenestration demonstrate that the window in question is not original to the building.

4.21 The earliest drawing available on a planning search relates to application ref GR94/342 dated 1994. That application was accompanied by the existing drawing (below) which shows the kitchen window format as it exists today. Crucially, the drawing also shows that there were two other windows in a landscape format at that time on the property, both of which were unlikely to be original. Both were bow shaped bay windows, one to the front ground floor and one to the side ground floor. The side bow window was removed by virtue of consent to the 2 storey side extension and the front bow window was replaced with a Sash window in Portrait format to match the other 3 original Sash window openings on the front elevation under consent ref:- 20090717.

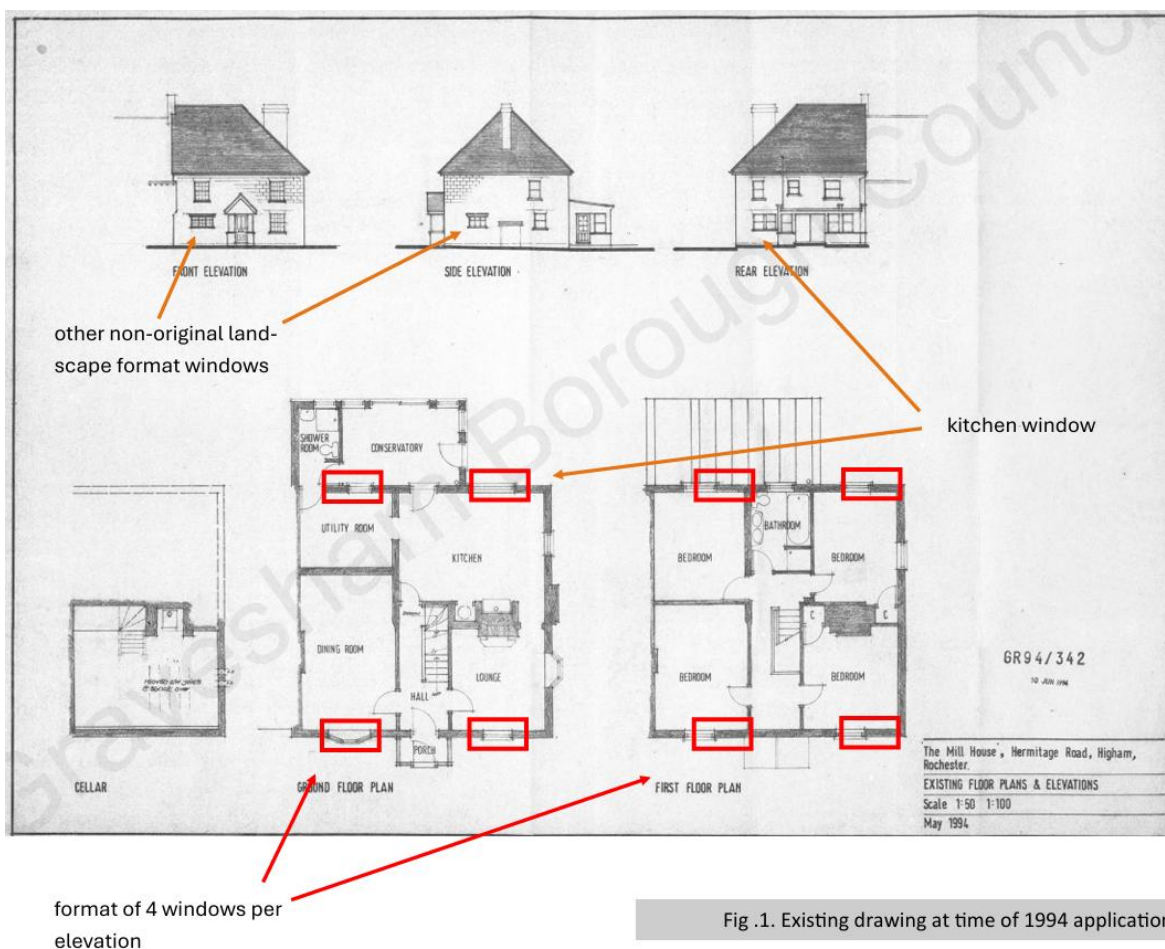


Fig .1. Existing drawing at time of 1994 application

- 4.22 The drawing also shows that the format of windows to both the front and rear elevation was 4 windows (2 on each floor) set symmetrically to each corner of the front and rear elevation with a central door and a central window over on the first floor (to the rear elevation only). This is evident when viewing the existing floor plans and on both floors – the floor plans clearly show this pattern of design on both floors and this would be entirely consistent with this age of property. That the existing plan also shows some later adaptations such as the utility Room door, the wider kitchen window and the Dining room bow window doesn't change the high likelihood that this format was the original format and layout of doors and windows on the front and rear elevation - 4 portrait Sash windows over two floors with a central door or window.
- 4.23 The cill height of these original windows would be around 770 – 780 mm above floor level (at ground floor) – this is evident to all ground floor windows. However the cill height of the Kitchen windows are higher than this. It is likely that the kitchen window cills were adjusted to allow a fitted kitchen to be installed in the property. The cill would have been raised above the worktop height of 900mm. It is also likely that at the same time the opening was widened to account for the loss of light created by a shorter window, this is reinforced by the fact that this window is over the kitchen sink and provides views over the garden and therefore the owners likely wanted the window to be enlarged to retain the sense of lighting in the former portrait window. There is no reason to suggest that this window format was original given all of the above.





Fig .3. Original window cill height

cill height of original
windows in house



Fig .4. Original window cill height

kitchen window over
height of kitchen work-
top—kitchen work top
is usually 900mm high

4.24 The window itself is double glazed and has spiral sashes. A cursory glance at the window shows that it is clearly not original.



- 4.25 The original kitchen window has already been lost at some time before 1994 and therefore the existing window to be removed cannot be seen to be an original feature or constitute historic fabric, and does not contribute to the significance of the Heritage Asset because:
- it is not in keeping with the original design direction of the elevations in terms of proportions and geometrical layout in relation to other windows
 - is different from every other window on the property in being landscape and having a higher cill
 - is not an original Sash window in that it is double glazed and uses spiral sashes, not cords.
- 4.26 There has clearly been significant change to the original scale, form and detail of the rear elevation of the building. Given this and its subservient nature, it cannot be concluded that the proposed extension and fenestration change would cause harm to the setting of the Listed Building and its historic character. There would be an alteration to the appearance of the rear of the building but not to its original historic character which was altered some time ago. As demonstrated, there would be no loss of original historic fabric.
- 4.27 NPPF para 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
- 4.28 In this instance, as explored above, the heritage significance of the rear elevation of the building is low given its subservience and the extensive changes that have been made to it over time. The window itself is not original in size, material or proportion and therefore this has a negligible significance.
- 4.29 If it were concluded that the proposal would cause harm to the significance of the heritage asset, then given the above and that the proposed extension replaces a very similar existing extension, then the harm would be less than substantial and at the minor end of the scale.
- 4.30 Para 215 of the NPPF requires that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the

public benefits of the proposal including, where appropriate, securing its optimum viable use. The officer report fails to make this assessment.

- 4.31 The existing sun room makes no contribution to the character of the building and is in decline. The proposed replacement would be a significantly higher quality sustainable structure and the improved water tightness and insulative properties would be of benefit to the whole building. The replacement of the sun room is an inevitable “moment” in the life of the building and the current owner is prepared to invest in a good quality replacement that is in keeping with the HA, is more energy efficient, usable and that will last.
- 4.32 On this basis therefore, if it were concluded that less than significant harm were caused to the significance of the heritage asset, the benefits of this in terms of reduced energy use and its associated climate consequences, and the improvement to the weather tightness for the whole historic building would represent benefits including securing the optimum use of the building. On balance, any perceived harm would be of a minor nature and outweighed by its benefits.

Other matters

- 4.133 As concluded in the officer report, the proposal would have no detrimental landscape, amenity or transport impact.

5.0 CONCLUSION

- 5.1 Taking all the above matters into account, it is concluded that sufficient additional information including expanded details about the historic evolution of the building in relation to the existing fenestration, and a case for very special circumstances has been provided to overcome the previous reasons for refusal and that planning permission and listed building consent should be granted for the proposal.
- 5.6 Should the Planning Officer wish to view the application site with the applicant or agent they are welcome to contact us. Furthermore, if additional information is required or any concerns are raised,

we would be happy to discuss the application further. It is hoped that such discussions are carried out prior to determination.