

Delegated Report

Householder Planning and Listed Building Consent Applications

Application No:	20250602 – Householder Planning Application 20250603 – Listed Building Consent
Location:	Mill House, Hermitage Road, Higham, Rochester, Kent, ME3 7ND
Description:	20250602 – Demolition of rear sun room and erection of a single storey rear extension with roof light. 20250603 – Application for Listed Building Consent; Demolition of rear sun room and erection of a single storey rear extension with roof light.
Applicant:	Mr & Mrs Instance
Site Visit:	10 April 2025

Positive and Proactive Decision Making

In accordance with Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and paragraph 39 of the National Planning Policy Framework (NPPF) (2024), the Local Planning Authority has approached the assessment and determination of this application in a positive manner.

The Local Planning Authority engaged with the applicant, following the submission of the application and issuing of the pre-application report, regarding concerns with the scale of development within the Green Belt and harm to the Listed Building. As part of the engagement, the applicant was provided the opportunity to submit revised plans and additional justification for the development based on feedback.

The revised plans are not considered to have addressed concerns with inappropriate development in the Green Belt or harm to the Listed Building, and the reasons for this are set out later in this report.

Submitted Documents/Plans

- 20250602 – Application Form (dated 16 June 2025);
- 20250603 – Application Form (dated 16 June 2025);
- Supplementary Information – Heritage Statement by MKA Architects (dated May 2025);
- Supplementary Information – Response to Planning Department – Rev. B (dated November 2025);
- Drawing no. 2513/01/A – Site Location Plan and Existing Block Plan;
- Drawing no. 2513/05/A – Existing Plans;
- Drawing no. 2513/06 – Existing Elevations;
- Drawing no. 2513/10/B – Proposed Plans;
- Drawing no. 2513/11/B – Proposed Elevations.
- ~~Drawing no. 2513/10/A – Proposed Plans – SUPERSEDED;~~

• ~~Drawing no. 2513/11/A Proposed Elevations SUPERSEDED.~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20181283	Application for approval of conditions 3, 4, 5, 6 and 7 attached to planning permission reference number 20171161 relating to samples of the tiles to be used for the dormer cheeks and roof, details and samples of the air vent tiles, details of the dormer roof and half or full size showing the joinery details and relationship of the window to the dormer cheeks and the dormer roof/sill, drawings to a scale of 1:5 and 1:2 of the roof lights and full details of all fire protection works required.	APPROVAL OF DETAILS	17.10.2019
20171161	Application for Listed Building Consent for the proposed construction of a dormer window in the front and rear roof slopes, one roof light and three high level vent tiles within each of the front and rear roof slopes and a roof light within the side roof slope.	PERMITTED	27.04.2018
20171160	Construction of a dormer window in the front and rear roof slopes, one roof light and three high level vent tiles within each of the front and rear roof slopes and a roof light within the side roof slope.	PERMITTED	27.04.2018
20160538	Application for Listed Building Consent for the construction of two roof lights in the front roof slope, two roof lights in the rear roof slope, one roof light in the side roof slope and associated internal fire proofing works in relation to conversion of roof space.	PERMITTED	04.10.2016
20160537	Construction of two roof lights in the front roof slope, two roof lights in the rear roof slope, one roof light in the side roof slope and associated internal fire proofing works in relation to conversion of roof space.	PERMITTED	04.10.2016
20090717	Application for Listed Building Consent for the replacement of four windows in front elevation, either side of the porch.	PERMITTED	12.01.2010
20070139	Application for Listed Building consent for the installation of replacement windows for all windows on main house.	REFUSED	10.04.2007
20040831	Erection of double garage and store at the front.	PERMITTED	04.11.2004
19940355	Application for Listed Building consent in connection with the erection of a two storey side extension and retention of the conservatory at the rear.	PERMITTED	13.09.1994
19940342	Erection of two storey side extension to form enlarged lounge with enlarged bedroom over and retention of the conservatory at the rear.	PERMITTED	13.09.1994
19870576	Conversion of granary and cottage into 2 no dwellings each with the erection of a conservatory at the rear	PERMITTED	25.09.1987

	conversion of mill stump into garage with studio over and erection of a detached double garage on the western side		
19510118	Re-roofing (part) with pitched roof	PERMITTED	10.09.1951

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

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

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 14 – Meeting the challenge of climate change, flooding and coastal change
- 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)

Other material considerations

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, the Council has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architect or historic interest which it possesses.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area

Consultations, Publicity and Representations

External Consultees

Dickens Protection Society –

The Society notes the building is listed Grade II. The Society is concerned that as much as possible of the original structure should be retained and reinstated. It is noted that the proposal may entail removing some of the original external wall which should be avoided.

Internal Consultees

GBC Conservation Officer –

1. 20 August 2025 (first comment)

The extension has been lined through with the wrong edge of the window. The existing ground floor window is original and should not be lost. The application has not been supported by a heritage statement to show an understanding of the building, if it had then this matter would have been picked up.

The proposals would result in harm to the listed building as a result of the loss of an original external window opening, and is therefore contrary to local and national policy.

2. 01 December 2025 (final comment)

Having read the additional information submitted, the concerns with the loss of the original window opening and the harm to the Listed Building remain. It is acknowledged that the original single sash window has been replaced with a double sash opening, however the outer side of the opening lines through with the first floor window and the extension would result in its complete loss.

In addition to the loss of the opening, the width of the proposed extension dominates the Listed Building and causes further harm to its setting and appearance.

The proposals would result in harm to the listed building as a result of the loss of an original external window opening and the scale of the extension and is therefore contrary to local and national policy.

Local Ward Councillor –

As Ward Councillor, please note that I have no objections providing the Borough Council is satisfied that the development does not contravene any green belt status or materially impact on the amenity of the adjoining neighbouring properties.

Neighbouring properties

The applications were advertised in the Gravesend Messenger and notices were displayed on site.

In addition, two surrounding properties were consulted on each application and one representation was received for 20250603 (Listed Building Consent). The representation did not register support or objection to the proposal, and "do not wish to comment on the proposal at this stage".



The consultation period expired 25 July 2025.

Officer's Analysis

Site Description

Mill House is an end of terrace property, forming part of a Grade II Listed Building:

"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."

The property has been extended at the rear and side, with a detached triple garage building and an open-sided canopy bar to the east of the dwelling.



Development Proposal

This application proposes the demolition of the existing rear sun room and the erection of a single storey rear extension with roof light.

The extension would have the following dimensions:

- Depth – 3.75m
- Width – 7.9m
- Height – 2.95m



As part of the development, the patio area would be altered and squared off to the dwelling, resulting in a reduction of approx. 15.7m².

Principle of Development

- Green Belt
- Design and Impact on the Listed Building
- Design and Impact on the Landscape
- Amenity of Future Occupiers
- Neighbouring Amenity
- Highways and Parking
- Any Other Material Planning Considerations

Green Belt

The application site is located in the Green Belt and as such Policy CS02 of the Gravesham Local Plan Core Strategy (LPCS) (2014) is relevant. Development in the urban area is prioritised as the sustainable location for development. In the rural area, Policy CS02 states that development will be supported within rural settlements that are inset from the Green Belt and defined on the policies map. Development outside those settlements, i.e. in the Green Belt, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the LPCS.

Is the proposed development appropriate in the Green Belt?

There are strict policy considerations within the Green Belt whereby 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. Paragraph 153 goes on to say that very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it falls within the specified exceptions. The relevant exception to consider for this application is part c of paragraph 154 of the NPPF (2024), 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.

In determining this proposal account will be taken of Saved Policy C13 of the Gravesham Local Plan First Review (LPFR) (1994) which 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 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 due weight.

	Original Dwelling	Proposed Extended Dwelling	% increase above original
Footprint (m²)	79.5m ²	123.8m ²	55.7%
Internal Floorspace Area (m²)	73.1m ²	240.6m ²	150%
Volume	-	-	-

The calculations demonstrate that the proposed additions to the dwellinghouse exceed the one third limit set out in saved policy C13. Therefore, in purely numerical terms, the extension is contrary to the local plan Green Belt policy, potentially representing a disproportionate increase over the original floor area of the building. The volume calculations of the extensions, over the original dwelling, have not been calculated in this application and will instead be visually assessed.

Notwithstanding the above, domestic outbuildings including garages and other outbuildings, do not specifically fall within the list and as such are considered to be inappropriate development per se. However, within case law it was considered (in *Warwick DC v SSLUHC* [2022]) that paragraph 154(c) is not confined to physically attached structures, and an “extension” can include detached structures. Therefore, it is important to consider if the existing garage and bar outbuilding are extensions to the dwelling under the Warwick judgement.

The Warwick judgement references Sevenoaks’ approach to the NPPF and the installation of domestic adjuncts to dwellinghouses within the Green Belt, concluding that a building can be regarded as an adjunct without being physically connected to another building, and therefore can be considered extensions of other buildings without the physical connection. The judgement indicates that regard should be had to the proximity of the buildings, their purpose and use, and factors such as their size. It is summarised that, “in the domestic setting it is not artificial to describe garages or other outbuildings as being extensions of the principal dwelling house”. The use of ‘not artificial’ in this instance can be interpreted as not false or unnatural, and therefore it is correct and natural to consider a garage to be an extension to the principal dwelling house.

Therefore, using the Warwick judgement, the garage and outbuilding are incidental to the dwelling and would fit within the use of domestic extensions to the dwelling as set out in the judgement. The outbuildings are approx. 5m from the dwelling and therefore are within a close proximity to be adjuncts. As such, the Local Planning Authority would consider the garage and bar outbuilding to be domestic adjuncts and would increase the overall footprint of the extensions by approx. 69.4m², resulting in an increase over the original footprint of 152%.

However, the numerical calculation forms only a part of the overall assessment. Paragraph 154 of the NPPF (2024) 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. It does not provide a figure.

The proposal will replace an existing extension but is larger than the one it would replace both in width and depth. This does not constitute a disproportionate addition and the extension in isolation is considered to be proportionate, however the cumulative impact of extensions to the original dwelling are a material consideration.

As demonstrated in the planning history, the property has been extended to the front (porch), side (two storey), rear (sun room) and into the loft (dormers). These additions have significantly increased the scale of the original building, and the cumulative impact of the enlargements are considered to be disproportionate as demonstrated in the annotated screenshots below:



It is therefore considered that the proposed development and previous extensions are disproportionate cumulative additions to the original property and as such the proposal would be inappropriate development which is by definition, harmful to the Green Belt. It is therefore contrary to Policy CS02 (LPCS), Policy C13 (LPFR) and to paragraph 154 of the NPPF (2024).

The effect of the proposal on the openness of the Green Belt

Paragraph 142 of the NPPF (2024) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence.

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: 001 Reference ID: 64-001-20190722), which include both spatial and visual consideration. Therefore, 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.

In spatial terms, the proposed development would be located at the rear of the main dwelling and replacing an existing rear projection. Albeit larger than the one it would replace, the overall increase in depth is 0.95m and width 1.75m, which is off-set by the reduction in the patio through its alteration. Therefore, in spatial terms, the overall development would result in an increase in size of extension but a reduction in the overall spread of development and which is considered to benefit the spatial openness. Visually, the extension is not considered to have any impact on the openness, by virtue of it being a replacement and its location to the rear of the dwelling with isolated visibility.

Therefore, notwithstanding that the proposal result in cumulative disproportionate additions to the original dwelling, the extension is not considered to erode the open permanence of the Green Belt.

Reference back to paragraphs 153 of the NPPF (2024) informs us that inappropriate development in the Green Belt should not be approved except in very special circumstances and that very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Whether the development causes any other harm and whether there are any other relevant considerations to balance the overall planning argument, should now be considered. No specific arguments have been put forward by the applicant in relation to the assessment of 'very special circumstances' and would not be considered to outweigh the harm established above.

Very special circumstances

The proposal would constitute inappropriate development in the Green Belt and paragraph 153 of the NPPF (2024) requires substantial weight to be given to this. However, the NPPF (2024) clarifies that inappropriate development should only be permitted in very special circumstances and that such will not exist unless the potential harm resulting from the proposal is clearly outweighed by other considerations.

No specific arguments have been put forward by the applicant in relation to the assessment of 'very special circumstances'.

The supporting information does set out that the sun room is in a state of disrepair and is causing leaks into the Listed Building, however it is acknowledged by the applicant that improvements and fixes could address these issues and therefore only limited weight is attached to this.

Design and Impact on the Listed Building

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) 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.

The NPPF (2024) also places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 219). This is echoed in Policy CS20 (LPCS), which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 of the Local Plan First Review (LPFR) (1994) sets out that for development affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building, and whether the character or appearance of the listed building will suffer as a result. Proposals must be sympathetic in terms of their appearance and materials.

Whilst it is recognised that development which makes effective use of land should be supported (paragraph 124 of the NPPF (2024)), this comes with the proviso that it should safeguard and improve the environment and not conflict with other policies in the NPPF (2024). Relevant to this proposal is paragraph 135 of the NPPF (2024) which states that developments that makes efficient use of land should be supported, taking into account the identified need for different types of housing, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed places.

The proposal is considered to harm the listed building through the loss of original features and due to its scale. The Conservation Officer has reviewed the proposal from pre-application stage to the latest submission, and considers that the extension fails to preserve the integrity of the original listed building and harms its character and appearance:

"Having read the additional information submitted, the concerns with the loss of the original window opening and the harm to the Listed Building remain. It is acknowledged that the original single sash window has been replaced with a double sash opening, however the outer side of the opening lines through with the first floor window and the extension would resulting in its complete loss.

In addition to the loss of the opening, the width of the proposed extension dominates the Listed Building and causes further harm to its setting and appearance.

The proposals would result in harm to the listed building as a result of the loss of an original external window opening and the scale of the extension and is therefore contrary to local and national policy."

Therefore, the extension by virtue of scale and associated loss of an original window opening causes harm to the setting of the Listed Building and its character, contrary to saved policy TC2 (LPFR), Policies CS19 and CS20 (LPCS) and Sections 12 and 16 of the NPPF (2024).



Design and Impact on the Landscape

In addition to being within the Green Belt, the application site falls within the Shorne Woodland Landscape Character Area. Paragraph 189 of the NPPF (2024) states that great weight should be given to conserving and enhancing landscape and Policy CS12 (LPCS) seeks to protect the Green infrastructure within the Borough and states at 5.7.26 the overall landscape character and valued landscapes will be conserved, restored and enhanced.

The application site is located within the Higham Arable Farmlands landscape character area. This area is characterised by very gently undulating topography of open arable farmland with pockets of orchards and garden nurseries. The developments spread from the original Saxon settlement of Lower Higham in the North, to more contemporary developments in the South around main road networks.

The proposed extension is not considered to have any detrimental impact on the Higham Arable Farmlands landscape character area by virtue of being on a residential section of Henley Street characterised by varied properties.

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020).

The enlarged rooms within the extensions exceed Gravesham's RLG (2020) and will provide a good quality living environment for future occupiers in accordance with Policy CS19 (LPCS).

Neighbouring Amenity

Policy CS19 (LPCS) requires new development to safeguard the amenity, including privacy, daylight and sunlight, of neighbouring properties and land and Section 12 of the NPPF (2024) requires development to have a high standard of amenity for existing users (in this case surrounding properties).

The proposed extension would be constructed on the flank boundary with the neighbour (Mill Court). As shown in the satellite image below, the neighbour is set-back from the rear wall of the existing sun room by approx. 5.6m.



The new extension would increase the depth of the application property by approx. 0.95m, resulting in an

overall set-back of 6.55m. While this elongates the development on the shared boundary, the extension is single storey and is replacing an existing structure, which reduces the impact on the neighbour. As such, the extensions is not considered to result in any privacy, loss of light, outlook or sense of enclosure impacts.

Therefore, the proposal is considered to safeguard the amenity of neighbouring properties in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Parking and Highways

The development should provide an acceptable amount of parking, not be detrimental to the highway network and promote sustainable transport methods, to accord with saved policy T1 and P3 of Gravesham Local Plan First Review (1994), Policy CS11 (LPCS) and Section 9 of the NPPF (2024).

The property benefits from a large driveway and detached garage, with sufficient space for off-street parking. This provision will not be impacted by the proposed development and therefore no adverse impacts are expected on the highway network.

Conclusion

The application has been fully considered and is contrary to local and national planning policy.

The proposed extension and the 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. Moreover, the scale and associated loss of an original window opening causes harm to the setting of the Listed Building and its character.

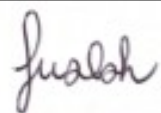
Therefore, it is recommended that the application is refused on the following grounds:

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).

Recommendation

Refusal

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	4 th December 2025	Dated:	05 December 2025

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