Gravesham Borough Council

# Delegated Report

## *Full Planning and Listed Building Consent Applications*

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| **Planning Application No:** | 20260158 (Planning) and 20260159 (LBC) |
| **Location:** | White House Farm School Lane Higham Rochester |
| **Description:** | **20260158**: Redevelopment of barn (building 5) and reconstruction of adjoining building (building 8).<br><br>**20260159:** Application for Listed Building Consent for the redevelopment of barn (building 5) including removal of roof tiles, and reconstruction of adjoining building (building 8). |
| **Applicant:** | Mr Paul Giles |
| **Site Visit Date:** | 3 March 2026 |

**Submitted Documents/Plans**

Application form
Location Plan
Drawing nos. 1-3 of 3 (Existing Elevations and Sections)
Drawing no. 1 of 4 (Ground Floor)
Drawing no. 3 of 4 (Roof Plan)
Drawing no. 0010.000 (Existing Block Plan)
Drawing no. SKIB-006 (V2 Frame Plan & Trusses)
Drawing no. SKIB-009 (V2 3D View)
Drawing no. SKIB-010 (V2 3D View)
Heritage Statement (July 2024 V.2)
Design & Access Statement (February 2026)

**Supplementary Documents**
Drawing no. SKIB-008 (V2 3D View)
Drawing no. 0205 P05 (Proposed Plans)
Drawing no. 0310 P03 (Proposed Front and Side Elevation)
Drawing no. 0311 P03 (Proposed Rear and Side Elevation)
Drawing no. 0500 P02 (Building 5 Typical Section Setting Out and Eaves Detail)
Impact on Significance Statement

**Superseded Documents:**
~~Drawing no. 0205 P2 (Proposed Plans)~~
~~Drawing no. 0310 P1 (Proposed Front and Side Elevation)~~
~~Drawing no. 0311 P1 (Proposed Rear and Side Elevation)~~

**Relevant Planning History**

| Reference | Description | Decision | Decision Date |
|---|---|---|---|
| 20240729 | Application for Listed Building Consent for the replacement of outbuilding forming single storey gym | Permitted | 03.10.2024 |

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| | and retrospective external repairs to other outbuildings. | | |
| 20240733 | Replacement of outbuilding forming single storey gym and retrospective external repairs to other outbuildings. | Permitted | 03.10.2024 |
| 20210383 | Application for determination as to whether prior approval is required for the proposed change of use and conversion of an agricultural barn to a dwelling. | Granted | 08.06.2021 |
| 20160579 | Application for determination as to whether prior approval is required for the proposed change of use of the existing agricultural buildings to a 4no. bedroom dwelling and associated operational development (Class Q(a) and (b) of Part 3 of Schedule 2 to the GPDO). | Refused<br><br>Appeal allowed | 05.08.2016<br><br>16.06.2017 |
| 20140194 | Retrospective Listed Building Consent for alteration of internal doors, architraves and skirting boards, the removal of two raised steps at the head of the ground floor staircase, with subsequent alteration of floor levels and alteration of the staircase to the attic, replacement of missing section of handrail at first floor level, installation of underfloor heating, internal wall insulation, reinstatement of timber beam on ground floor ceiling, installation of external alarm system, and installation of fire/heat detection system. | Permitted | 01.10.2014 |
| 20120540 | Application for approval of conditions 3, 4, 5(a)(b)(c)(d)(e), 6 and 8 attached to Listed Building Consent reference number 20120109 and planning permission reference numbers 20120110 relating to the external materials, revised drawings, joinery details and the archaeological watching brief. | Approval of details | 28.11.2012 |
| 20120109 | Application for Listed Building Consent for erection of a two storey extension on north east corner to provide enlarged lounge at ground floor with bedroom and ensuite shower room/wc together with alterations to scheme previously approved under Listed Building Consent reference number 20100780. | Permitted | 18.05.2012 |
| 20120110 | Erection of two storey extension on north east corner to provide enlarged lounge at ground floor level with bedroom and ensuite shower room/wc together with minor alterations to the scheme previously approved under planning permission reference number 20100779. | Permitted | 17.05.2012 |
| 20110987 | Application for removal/variation of conditions 3, 4(b)(d), 5 and 6 attached to Listed Building Consent reference number 20100780 for internal and external alterations including the erection of a single storey side/front extension and first floor rear extension; demolition of existing front lobby and erection of new front porch, screen wall with railings and removal of single storey 1960's rear projection in order to require the submission of details of materials of the different elements of the permitted proposals at different stages and the removal of requirements to submit details for works which are now no longer proposed. | Approval of details | 07.03.2012 |
| 20110984 | Application for removal/variation of conditions 3, 4(b)(d), 5, 7 and 8 attached to planning permission | Approval of details | 07.03.2012 |

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| | reference number 20100779 for erection of single storey side/front extension and first floor rear extension to form sun lounge at ground floor level and a bedroom at first floor level and erection of a front porch to replace lobby in order to require the submission of details of materials of the different elements of the permitted proposals at different stages and the removal of requirements to submit details for works which are now no longer proposed. | | |
| 20110733 | Application for approval of conditions 4(a) and 4(c) attached to planning permission reference number 20100779 and listed building consent reference number 20100780 relating to the joinery details and front porch details. | Approval of details | 10.02.2012 |
| 20100780 | Application for Listed Building Consent for internal and external alterations including the erection of a single storey side/front extension and first floor rear extension; demolition of existing front lobby and erection of new front porch, screen wall with railings and removal of single storey 1960's rear projection. | Permitted | 30.03.2011 |
| 20100779 | Erection of single storey side/front extension and first floor rear extension to form sun lounge at ground floor level and a bedroom at first floor level and erection of a front porch to replace lobby. | Permitted | 30.03.2011 |
| 19880557 | Application for listed building consent for the demolition of the chimney stack on the west roof slope. | Permitted | 04.08.1988 |
| 19870252 | Erection of a single storey rear extension to form an enlarged day room and erection of a front porch | Permitted | 07.07.1987 |
| 19870253 | Application for Listed Building Consent for elevational and internal alterations erection of a single storey rear extension to form an enlarged day room and erection of a front porch | Permitted | 07.07.1987 |
| 19861048 | Application for Listed Building Consent for internal and external alterations in connection with the renovation of the premises | Permitted | 06.04.1987 |

**Development Plan**

<u>Gravesham Local Plan Core Strategy (2014)</u>

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principles
- CS20 – Heritage and the Historic Environment

<u>Gravesham Local Plan: First Review (1994)</u>

- TC2 – Policy for Listed Buildings
- TC7 – Other Archaeological Sites
- C11 – Policy for Change of use of Redundant Buildings in the Countryside
- T1 – Impact of Development on Highway Network
- P3 – Vehicle Parking Standards

As set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012 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

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 (2026), the Council will also seek to replace these.

National Planning Policy Framework 2026

- Section 3 – Decision-making policies
- Section 4 – Achieving sustainable development
- Section 5 – Meeting the challenge of climate change
- Section 12 – Making effective use of land
- Section 13 – Protecting Green Belt land
- Section 14 – Achieving well-designed places
- Section 15 – Promoting sustainable transport
- Section 17 – Pollution, public protection and security
- Section 18 – Managing flood risk and coastal change
- Section 19 – Conserving and enhancing the natural environment
- Section 20 - 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)
- Listed Buildings – A Guide for Owners and Occupiers – Informal Guidance (2020)

Section 16(2) and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) require special regard to be paid to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent or planning permission respectively.

**Emerging Local Plan as a Material Consideration**

Paragraph 3 of the National Planning Policy Framework 2026 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 Plan. The NPPF, at Policy DM4, allows local planning authorities to give weight to relevant policies in emerging development 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 compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).

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 (Policy DM4) of the NPPF 2026.

The Council's emerging Local Plan has reached the Regulation 19 Consultation 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 (2026). 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**

External Consultees

*Dickens' Country Protection Society*

It appears to the Society that the barn referred to as No.8 may also be of listable quality and as far as possible should be conserved. It is in a poor state of repair with tiles missing of the roof.

Conversion should, as far as possible, leave the walls restored with the exception of the lean-to which appears to be a later addition.

The elevation drawing 24.051 0311 is assumed to show the proposed Pool Building in front of the barn.

*Higham Parish Council*

Higham Parish Council feels it is in the best interest of parishioners to provide comments for consideration to the planning application submitted for the above property for the "Redevelopment of barn (building 5), reconstruction of adjoining building (building 8), and construction of a new pool house south-east of the barn."

Councillors feel the proposed planning application doesn't cause any concern, however, would like a condition added to the decision to ensure the property remains for residential use only.

*KCC Heritage*

Whitehouse Farm is identifiable as a farm complex on the 1st Edition OS map, although it is known as Brick House. The farmhouse itself and an associated barn are listed buildings, but the whole complex is of heritage interest being a post medieval farm holding. Remains associated with post medieval or earlier activity may be revealed during groundworks and it would be useful for an archaeologist to monitor the development. I recommend the following condition is placed on any forthcoming consent:

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of an archaeological watching brief to be undertaken by an archaeologist approved by the Local Planning Authority so that groundworks are observed and items of interest and finds are recorded, reported on and the new information made publicly accessible. The watching brief shall be in accordance with a Written Scheme of Investigation, which has been submitted to and approved in writing by the Local

Planning Authority.

Reason: To ensure that features of archaeological interest are properly examined and recorded.

*Society for the Protection of Ancient Buildings*

Thank you for notifying the SPAB of the above application affecting this 16th century Grade II listed barn. Having carefully reviewed the application documents, we have a number of concerns with the application as it currently stands and wish to register our objection.
We do not object in principle to the proposed change of use, which may provide a sustainable future for the historic barn. However, the application currently lacks sufficient detail to allow a proper understanding of the impact on the building's historic fabric and significance.

We draw attention to the requirements of the National Planning Policy Framework, and in particular:

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
212. 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.
213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

We expand on these points below.

The close proximity of the proposed pool building to the barn's southeast elevation would obscure a principal historic façade and extend built form beyond the traditional farmyard arrangement. This reduces the ability to appreciate the barn's historic form and its prominence within the group. We therefore encourage the applicant to explore relocating the pool building further from the barn and/or reducing its scale.

While we do not object to the intended use of building 8, the impact of the proposed rebuilding on surviving historic fabric has not been assessed. The proposed new opening between buildings 5 and 8 affects the barn's historic south elevation and would result in loss of early fabric, yet no justification has been provided. The need for the intervention and the extent of resulting harm both require further assessment.

The Heritage Statement describes the timber frame as being in "excellent condition", yet the drawings indicate replacement of rafters, wall panelling and bracing. This inconsistency suggests a need for a detailed report by a historic timber-frame specialist or a CARE registered structural engineer. Such a report should identify surviving fabric and recommend appropriate, minimal-intervention repairs consistent with a repair-first approach and replacement of structural timber only where repair is not feasible.

We would also expect to see a full specification and method statements for the proposed works, including:
• thermal upgrades
• changes to doors and windows
• treatments to flooring, walls, and ceilings

If a historic threshing floor has survived, it should be protected in situ.

Given the building's significance, the involvement of a conservation-accredited architect is strongly recommended. Without the above information, it is not possible to assess the impact of the works on the barn's historic interest.

Large areas of glazing, particularly to the north gable, would significantly alter the barn's character. Traditional agricultural buildings are defined by a predominantly solid envelope with limited openings. The barn doors are integral to the identity of the barn and evidence its use, therefore their prominence is a characteristic that requires protection. Any glazing proposals should be carefully detailed to preserve this

character and avoid visual harm.

In summary, while we do not object to the proposed change of use, further information and reconsideration of certain elements are required before the impact of the proposals can be properly understood. Until this information is provided, the application does not meet the requirements of the NPPF and should be withdrawn for these points to be addressed.

Internal Consultees

*GBC Conservation*

*14/05/2026:*
Regarding the proposed swimming pool this will appear incongruous and out of character with the historic farmstead.

Impact on Setting and Farmyard Character
The proposed pool building is sited in close proximity to the southeast elevation. This would:
- Obscure a principal historic façade.
- Extend built form beyond the traditional farmyard arrangement, reducing the ability to appreciate the barn’s prominence.

The timber frame repairs need to be submitted as part of the application and I understand these will be recording on the axonometric drawings emailed by Paul Giles.

Without the additional information and reconsiderations outlined above, it is not possible to assess the impact of the works on the barn's historic interest. It is recommended that the application be withdrawn or held in abeyance until these points are addressed.

*02/06/2026:*
Thanks for discussing the proposals and I confirm:

The Heritage Tile, Conservation Weathered, now proposed is acceptable.
I am pleased to see the swimming pool is now to be removed from the proposal.
Regarding windows and as discussed, the gable end window is to be conceded, and the clerestory windows option on the courtyard elevation is supported rather than the alternative proposed with shutters, which will appear domesticated and incongruous.

*03/06/2026:*
Conservation Officer Response – White House Farm Barn
Assessment of Proposed Domestic-Style Windows within Curtilage Listed Agricultural Building
The applicant's statement concludes that the proposed domestic-style window insertions result in "no harm, or at most a very low level of less than substantial harm" to the significance of the heritage assets. This conclusion is not accepted.

Whilst the proposed alterations are concentrated on courtyard-facing elevations, the significance of a historic farmstead is not derived solely from views available from the public realm or wider landscape. Historic England guidance recognises that the significance of traditional farm buildings derives from their form, plan, relationship with adjoining structures, agricultural function and the survival of characteristic features, including their distinctive pattern of openings. The enclosed farmyard itself forms an important part of the historic significance of the farmstead and contributes to the understanding of its historic agricultural use.

The applicant places considerable weight on the fact that the proposed windows are located on less publicly visible elevations. However, heritage significance is not determined solely by visibility. The statutory duty under Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be given to preserving the listed building and its setting, including elements of significance

that may not be readily visible from public viewpoints.

Historic England Guidance on New Openings
The proposal appears to introduce domestic-style fenestration into a former agricultural building whose character is derived in part from the absence of such openings.
Historic England's guidance The Conversion of Traditional Farm Buildings: A Guide to Good Practice notes that:
"The historic pattern of openings is a direct product of the function of the building over time" and that traditional farm buildings are "characterised by few external openings." It further advises that existing openings form "a fundamental element of a farm building's character" and that there should be "a presumption in favour of maximising the use of these existing openings without changing their size, and limiting the formation of new ones."
The guidance emphasises that daylight requirements associated with residential conversion should not override the need to conserve historic character and that users may have to accept lower levels of daylight where necessary to preserve significance.
The proposal introduces windows whose proportions, arrangement and domestic appearance are not characteristic of the historic agricultural function of the building. In doing so, the scheme erodes one of the defining characteristics of traditional farm buildings: their simple wall planes with limited openings dictated by agricultural necessity rather than residential amenity.

Harm to Agricultural Character
The applicant states that Building 5 will retain its agricultural character because its form, massing, weatherboarding and roof profile remain unchanged.
This assessment underestimates the contribution made by openings to the significance of agricultural buildings. Historic England specifically identifies the pattern, number and form of openings as fundamental to understanding a building's original function.
Agricultural buildings were generally designed around ventilation rather than domestic requirements for light. Consequently, the introduction of regular domestic windows alters the visual language of the building and diminishes its ability to be read and understood as a former agricultural structure. The resulting appearance is increasingly domestic rather than agricultural.
The harm arises not from the loss of principal structural elements but from the incremental domestication of a historic farm building. Such domestication is a recognised risk in residential conversions of historic barns and farm buildings. Research commissioned by English Heritage found that conservation officers frequently identify residential conversions as problematic because they often require additional windows and domestic alterations that compromise historic character.

Curtilage Listed Status and Farmstead Significance
Although Building 5 is described as a secondary agricultural structure, its significance derives from its contribution to the wider historic farmstead and its relationship with the principal listed farmhouse and listed barn.
English Heritage research notes that curtilage-listed agricultural buildings form part of the significance of the principal listed group and are subject to listed building control because of that historic relationship.
The significance of such buildings should not be assessed in isolation. The cumulative impact of introducing domestic fenestration into ancillary agricultural buildings can diminish the collective agricultural character and legibility of the historic farmstead.

Alternative Approaches
Historic England guidance demonstrates that where additional light is required, less harmful solutions are generally preferred. These include:
- Retention and glazing of existing openings.
- Use of existing cart entrances and agricultural openings.
- Glazing recessed deep within existing apertures.
- Retention of ventilation slits and agricultural features.
- Small, carefully detailed openings that minimise disruption to historic walling.
- Use of timber louvres, shutters or other agricultural forms of screening.
- Openings designed with a simple vertical emphasis reflecting agricultural precedents rather than

domestic window patterns.
The submitted scheme has not demonstrated that such less harmful alternatives have been fully explored.

Conclusion
The proposal would introduce domestic-style windows that are uncharacteristic of the historic agricultural function of the building and contrary to established Historic England guidance regarding the treatment of openings in traditional farm buildings.
The fact that the alterations are confined to courtyard elevations does not remove the harm, as those elevations contribute directly to the significance, legibility and historic character of the farmstead. The proposal would erode the agricultural appearance of the curtilage-listed building and diminish the collective significance of the historic farmstead group.
Consequently, it is considered that the proposal would result in less than substantial harm to the significance of the curtilage-listed agricultural building and the wider heritage asset. The level of harm is greater than suggested by the applicant because it affects a defining characteristic of traditional agricultural buildings, namely their sparse and functional pattern of openings. The proposal therefore fails to fully accord with the conservation objectives of the Planning (Listed Buildings and Conservation Areas) Act 1990, the National Planning Policy Framework and Historic England guidance relating to the conversion of traditional farm buildings.

Summary:
I remain concerned about the introduction of domestic-style windows within this curtilage listed agricultural building.

The applicant's justification places considerable emphasis on the limited public visibility of the proposed windows; however, heritage significance is not determined solely by public views. The courtyard elevations form an integral part of the historic farmstead and contribute to the understanding and legibility of the building's agricultural function.

Historic England's guidance on the conversion of traditional farm buildings identifies the pattern and form of openings as a fundamental component of their character. The guidance establishes a presumption in favour of retaining and utilising existing openings and limiting the creation of new ones, recognising that traditional agricultural buildings are typically characterised by sparse and functional fenestration. It also notes that residential conversions should not drive the insertion of domestic-style windows where this would erode historic character.

In this case, the proposed windows appear domestic in their proportions and detailing and would contribute to the gradual domestication of the building, reducing its agricultural character and its ability to be understood as a historic farm building. Whilst the harm may fall within the lower end of the less than substantial harm spectrum, I do not agree with the applicant's conclusion that the proposals would result in no harm.

If the applicant is unwilling to adopt the alternative proposal then we will have to re-assess all new windows.

*10/06/2026:*
The clerestory light opening should be no more that 1500mm x 400mm and tucked under the 200x200 wall plate. We need to see them in an elevation drawing.

*17/08/2026:*

Thank you for consulting me on the above application, which affects Building 5 (a Grade II curtilage listed 16th/17th-century aisled barn) and Building 8.

Summary of heritage position
Having reviewed the revised submission, supplementary information, and the direct email correspondence with the applicant's team, I can confirm the following matters are now resolved:
- Pool house – Removed from the scheme (drawing 24.051-ONA-ZZ-XX-DRA-0205, Rev P05, dated

15.06.2026; confirmed in correspondence of 18.06.2026), addressing SPAB's principal setting concern, subject to the documentation point below.

- Roof tiles – Resolved via "Heritage Tiles – Conservation Weathered" handmade clay tile (heritagetiles.co.uk), confirmed acceptable in my email of 28.05.2026 and reconfirmed by the applicant on 03.06.2026. This supersedes the earlier "Volcano" sample (rejected as too uniform/machine-made) and the interim blended-mix proposal (20% Weathered/30% Amber/50% Hermitage) discussed on 26.05.2026, neither of which were taken forward.
- Glazing to the large gable end window – Agreed without louvres, per your email of 02.06.2026, on the basis of clear local precedent for openings of this type and scale.
- Courtyard windows (clerestory lights) – Also now resolved. Following concerns raised about the originally submitted domestic-style openings, agreement was reached on 4 no. clerestory-style openings to the courtyard elevation, tucked beneath the 200×200mm wall plate, with a maximum size of 1500mm × 400mm (confirmed in my email of 10.06.2026). This has been reflected in the revised Eaves Detail drawing (24.051-ONA-ZZ-XX-M2-A-0500, Rev P02, 15.06.2026) and confirmed by the agent's email of 18.06.2026.
- Weatherboarding – Sample submitted 07.05.2026; specification (175mm boards tapering 32mm to 7-10mm, ~150-155mm exposed face) agreed by correspondence dated 21.05.2026 and 18.06.2026.

All substantive design matters raised through the course of this application have therefore now been agreed between myself and the applicant's team, subject to the single documentation point below.

Inconsistency between drawings and supporting documents – pool house
I'd flag one outstanding administrative matter before determination. The floor plan (24.051-ONA-ZZ-XX-DR-A-0205, Rev P05, dated 15.06.2026) has been revised to remove the pool house, but this has not been carried through to:

- The Design & Access Statement (24.051-ONA-XX-XX-RP-A-0002), which still includes the "Pool House & Link" narrative, precedent images, a materials description for the poolhouse cladding, and a CGI titled "Indicative View of Proposed Poolhouse."
- Proposed Elevations drawing 0310, which remains at Revision P1 (03.02.2026), pre-dating the removal, and still refers to poolhouse cladding.
- Proposed Elevations drawing 0311, which should be checked for the same reason.

I'd recommend requesting updated versions of these documents from the agent, and ensuring the final list of approved plans on the decision notice excludes any drawing/document still showing the poolhouse, together with the description amendment the applicant has already agreed to (removal of "...and construction of a new pool house south-east of the barn").

Response to SPAB's comments

1. Pool house / setting – Resolved by removal, subject to the documentation point above.
2. Threshing floor – I have inspected the site personally and can confirm no surviving historic threshing floor was found within Building 5.
3. Level of information / proportionality – The Heritage Statement and drawings provide a proportionate basis for assessment (NPPF paragraph 211).
4. Timber frame condition and selective replacement – Consistent with a repair-first, minimal-intervention approach; an as-built survey of the completed frame repairs has been agreed and will follow.
5. Glazing to the north and courtyard elevations – Now resolved via the agreed clerestory design, which retains the primacy of the solid envelope and avoids a domesticated appearance.
6. Opening between Buildings 5 and 8 – Limited in scale; any low-level less-than-substantial harm outweighed by the public benefit of securing viable long-term use (NPPF paragraph 213).

On this basis, I consider SPAB's concerns to have been substantively addressed through the design changes and conditions set out below, and I would support the grant of listed building consent, subject only to the documentation point above being resolved.

Recommended conditions

1. No works of demolition, alteration or repair to the timber frame shall commence until a detailed schedule of repairs, prepared by a conservation-accredited architect or CARE-registered structural engineer, has been submitted to and approved in writing by the Local Planning Authority. [Note: an as-built

survey has been agreed and is expected shortly — this may inform final wording.]
2. Any structural timber identified for replacement shall be confirmed as beyond repair by the appointed specialist, with photographic evidence provided.
3. The courtyard clerestory windows shall be installed strictly in accordance with the dimensions and position agreed (max. 1500mm × 400mm, tucked beneath the wall plate) as shown on drawing 24.051-ONA-ZZ-XX-M2-A-0500 Rev P02.
4. Details of the proposed opening between Buildings 5 and 8 shall be submitted to and approved in writing prior to works commencing.
5. Should any evidence of a historic threshing floor or other significant surviving fabric be exposed during works, works shall cease in that area and the Local Planning Authority shall be notified within 5 working days.
6. Roofing works shall be carried out using "Heritage Tiles – Conservation Weathered" handmade clay tiles, in accordance with the agreement recorded by email correspondence dated 28.05.2026.
7. Weatherboarding shall be carried out in accordance with the specification and sample agreed by correspondence dated 21.05.2026 and 18.06.2026.
8. A photographic and written record of the building shall be undertaken, to be deposited with the Kent Historic Environment Record.
9. No thermal upgrading, insulation or associated fabric alteration shall take place other than in accordance with approved details.
10. The development hereby permitted shall be carried out strictly in accordance with the approved drawings and documents listed on the decision notice by number and revision, and no superseded drawing or document (including any showing the previously proposed pool house) shall be relied upon for implementation.

I hope this draws matters together clearly now that all substantive design points have been agreed.

Neighbouring properties

The applications have been advertised to 6 neighbouring properties, on site and in the press. The overall consultation period expired on 20 March 2026.

No letters of representation have been received from neighbouring properties.

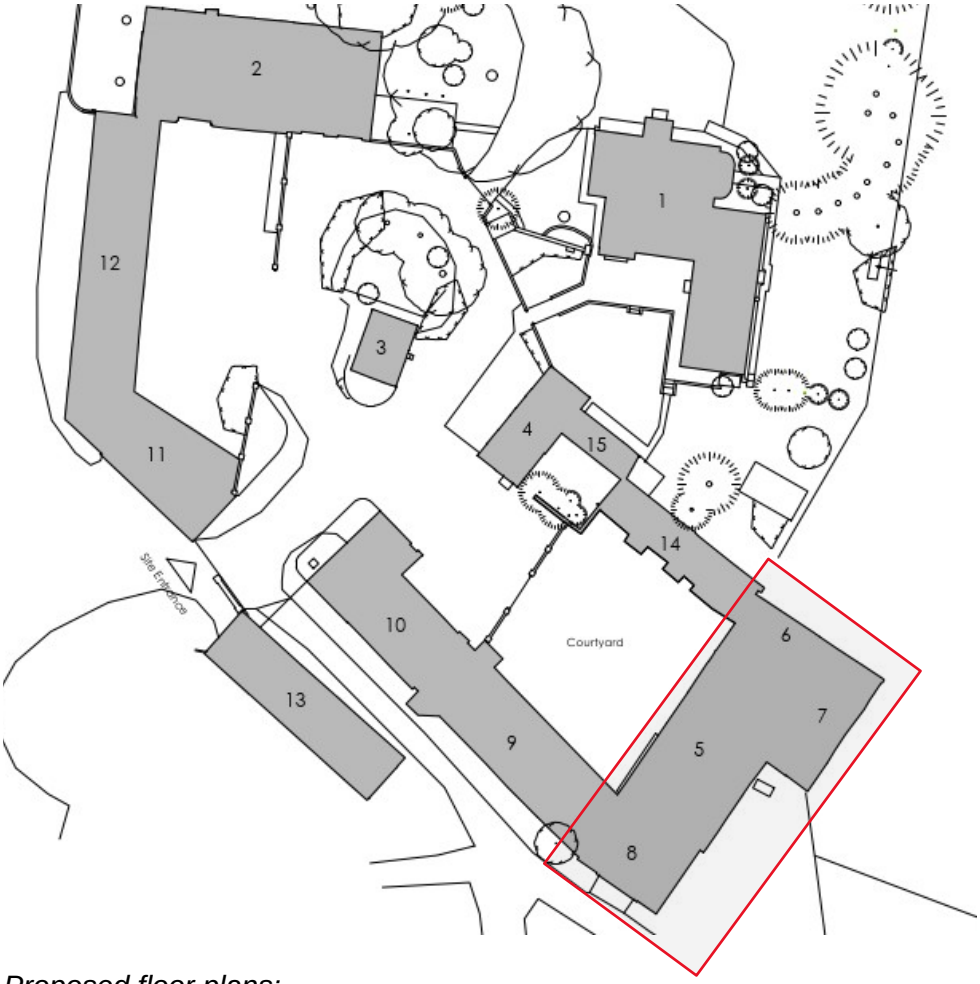
Local Ward Councillors were also consulted, and no responses were received.

**Officer’s Analysis**

Proposal

These applications seek planning permission and listed building consent for the redevelopment of the barn (building 5) and the reconstruction of the adjoining building (building 8).

*Existing block plan:*




*Proposed floor plans:*

The proposal seeks to restore and convert the agricultural barn into an open plan leisure and entertainment space, with a kitchen, utility room, central dining area and living/dining area. It will include new window openings.

The existing structures attached to the barn on its north-eastern and south-eastern elevations (buildings 6 and 7) have already been removed. The submitted Heritage Statement describes these as originally being animal covers; they were lean-to structures of simple construction.

According to the submitted Heritage Statement, the existing structure (building 8) on the south-western side of the barn was built in the 1950s as a machine repair workshop. It has already been removed. It was of breeze block construction, with a corrugated apex roof and double sliding doors. It abutted the gable end of building 5. The application seeks permission for the reconstruction of this building, which will contain a sauna, WCs, storage and a plant room.

The materials used will match the existing materials found on the site. The existing timber structure of the barn is to be retained and restored where applicable, with new black weather boarding to the exterior and new clay tiles to the roof:

Q-Clad Painted featheredge cladding

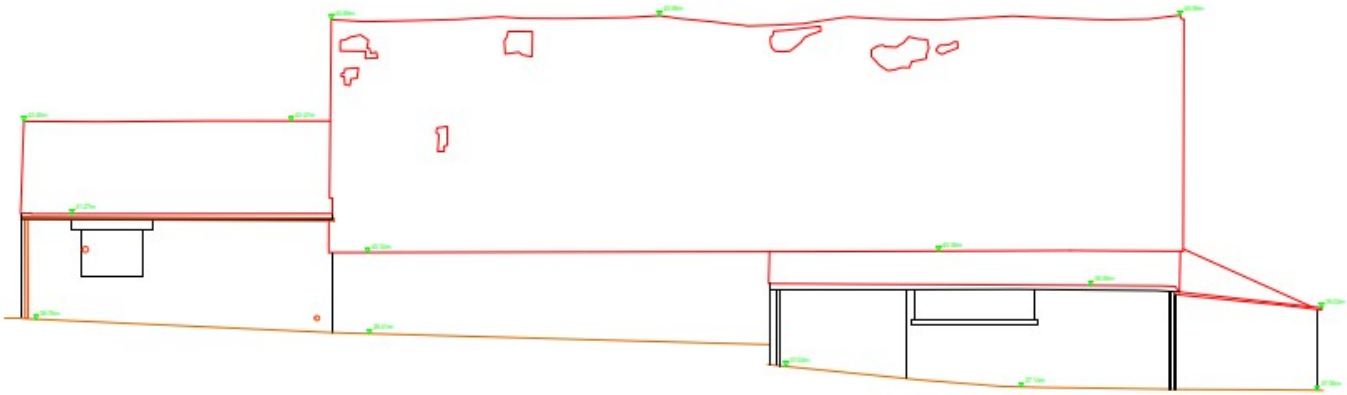
Rainwater goods are to be cast iron.

The central courtyard is to be made a feature with central water fountain and landscaping.

*Existing Elevations:*

*Front (north-west)*

*Rear (south-east)*



Side (south-west)

Side (north-east)

*Proposed Elevations:*

Front Elevation

Side Elevation (Left)

3 Rear Elevation

4 Side Elevation (Right)

The proposal originally included a linked pool building to the rear (south-east) of the barn but due to concerns about the impact on the listed buildings on the site, this element of the proposal was removed.

Site Description

White House Farm is located on the eastern side of a track called Land Way, which is accessed from School Lane to the west or Lower Rochester Road to the north. The barn is marked in red below. The site is surrounded by agricultural fields.

*Current Google Earth Image:*

The previous farmstead comprises 15 buildings, with the main farmhouse positioned to the north-east corner of the site. The house is Grade II Listed. The listing description is as follows:

*C16 or C17 from appearance of brickwork on north front and moulded beams internally. South front probably circa 1800. Two storeys and attic in gable on north front. Three sash windows. Upper floor with glazing bars. Bay on east front with quadrant brick sides. Early C19 stair semi-circular with swept handrail.*

The northern most barn to the west of the farmhouse is also Grade II Listed. The list description for the barn is as follows:

*C16 or C17. Probably contemporary with farmhouse. Weatherboarded. Tiled roof with added lights. Queen post roof.*

The remainder of the buildings are listed by virtue of their positioning within the residential curtilage of the site.

<u>Principle Issues</u>

The main issues to consider in the determination of these applications are as follows:

- the principle of development in the Green Belt;
- the design of the proposals and the impact on the architectural and historic interest of these curtilage listed buildings

- the impact on the character and appearance of the surrounding rural landscape;
- the effect of the proposal on the amenities of existing neighbouring properties, as well as whether the proposed development itself will provide satisfactory living accommodation for future occupiers; and
- its impact on highway safety and parking provision.

As the proposals involve the re-use and replacement of the listed structures, it will be demolished and replaced, it is the proposed replacement gym building that requires the widest consideration in relation to planning policy. As the remainder of the proposals have already been carried out and largely involve repairs, these only require consideration in relation to listed building impacts.

Principle of Development in the Green Belt

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (Section 13 of the NPPF 2026). Policy GB6 of the NPPF 2026 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such 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.

Policy CS02 of the 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 Core Strategy 2014.

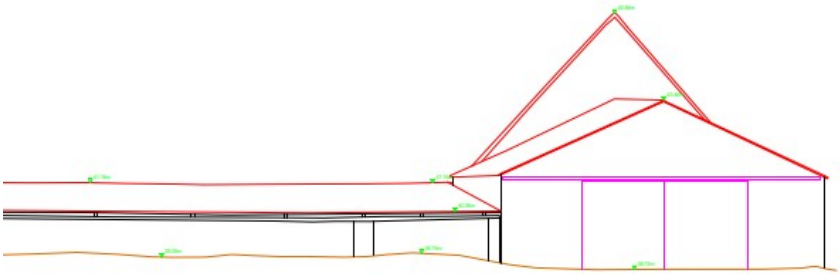
Development in the Green Belt is inappropriate unless it falls within one of the categories set out in Policy GB7 of the NPPF 2026. In the case of this proposal, as set out in Policy GB7, the relevant category is as follows:

b. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the original building. In the case of proposals for a replacement building, it should be for the same use and not materially larger than the one it replaces;

Saved Policy C11 of the Local Plan 1994 also permits the conversion of farm buildings to other uses, subject to various criteria.

The proposal would replace the existing Building 8 for a sauna/WC/store/plant use in connection with the existing residential use of the site. The existing building was a structure built in the 1950s as a machine repair workshop. The supporting Heritage Statement states that the building is '…*of simple breeze block construction built abutting the south-west gable end of building 5. It has a corrugated apex roof and double sliding doors.*'

The extracts below from the submitted plans illustrate the differences between the existing and proposed buildings:



In terms of the proposed size and height of the proposed replacement sauna etc. building, it will be similar in footprint to the existing structure, but with a flat roof, which will continue the roofline across from the adjoining converted gym building. The use will remain as a building within a residential curtilage in incidental residential use. On the basis that the proposal is for a replacement building that will be an incidental use and will not be materially larger than the one it replaces, it would therefore fall under one of the categories set out in Policy GB7 of the NPPF 2026 and would not be inappropriate development in the Green Belt.

Similarly, the re-use of the barn for an incidental residential use will not affect the openness of the Green Belt and would not conflict with Green Belt purposes and therefore would fall within under one of the categories set out in Policy GB7 of the NPPF 2026 and would not be inappropriate development in the Green Belt.

Design and Impact on Listed Building

Development Plan policy places considerable emphasis on the importance of promoting high quality and sustainable places (Section 14 of the NPPF 2026). Within this, Policy DP3 of the NPPF 2026 sets out that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The NPPF 2026 also seeks to conserve and enhance the historic environment (Section 20 of the NPPF 2026). This is echoed in Policy CS20 of the Core Strategy 2014, 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 1994 sets out that for development involving alterations to listed buildings or affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building. Proposals must be sympathetic in terms of their appearance and materials.

The proposals seek to re-use and replace two of the curtilage listed disused farm outbuildings on the site.

On the basis of revised submissions and supplementary information, including removing an initially proposed pool house link building on the basis of concerns from the Society for the Protection of Ancient Buildings (SPAB) and the Council's Conservation Officer, and resolving proposed materials including roof tiles, weatherboarding and windows, all substantive design matters have been agreed.

In response to SPAB's comments, the Conservation Officer is content their points have been substantively addressed through design changes and through the imposition of appropriate conditions as follows:

1. Pool house / setting – Resolved by removal from application description.
2. Threshing floor – The Conservation Officer has inspected the site personally and has confirmed no surviving historic threshing floor was found within Building 5.
3. Level of information / proportionality – The Heritage Statement and drawings provide a proportionate basis for assessment (Policy HE1 of the NPPF 2026).
4. Timber frame condition and selective replacement – Consistent with a repair-first, minimal-intervention approach; an as-built survey of the completed frame repairs has been agreed and will follow (to be conditioned).
5. Glazing to the north and courtyard elevations – Now resolved via the agreed clerestory window design, which retains the primacy of the solid envelope and avoids a domesticated appearance.
6. Opening between Buildings 5 and 8 – Limited in scale; any low-level less-than-substantial harm is outweighed by the public benefit of securing viable long-term use (Policy HE6 of the NPPF 2026).

The repairs to the buildings and replacement materials involved, including timber weatherboarding and clay roof tiles, are considered to be high quality and will maintain the integrity and setting of the listed buildings within the curtilage of this site. Overall, the proposals would comply with the requirements of Policies CS19 and CS20 of the Core Strategy 2014, Saved Policy TC2 of the Local Plan 1994 and Sections 14 and 20 of the NPPF 2026, and will conserve and enhance the listed buildings on the site.

<u>Character and Appearance of Surrounding Area</u>

With regard to the impact on the landscape, Policy CS12 of the Gravesham Core Strategy 2014 is relevant to this application, relating to green infrastructure. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment (LCA) 2009 will be taken into account in determining applications. The site is located within the Higham Arable Farmlands Landscape Character Area.

Whilst the proposals would result in some new built development on the site notably in the form of the proposed replacement sauna building, this would not represent a significant change in the character and appearance of the site and would not therefore result in any adverse visual impact on landscape character.

Overall, the proposals comprise appropriate alterations in terms of their size, scale and appearance, and would maintain the character and appearance of the site and landscape quality of the surrounding rural area. The proposals are therefore considered acceptable in design and landscape terms and would comply with the requirements of Policies CS12 and CS19 of the Core Strategy 2014, and Sections 14 and 19 of the NPPF 2026.

Residential Amenity

In relation to amenity, Section 12 of the NPPF 2026 seeks to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, Section 14 seeks to promote high quality, healthy, inclusive and sustainable places, and Section 17 focuses on the new development being appropriate for its location, taking into account the risks and impacts of pollution and other hazards. The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

*Future Occupiers*

The proposed changes would not introduce any amenity issues for future occupiers and would be in line with Policy CS19 of the Core Strategy 2014.

*Neighbouring Properties*

Due to detached nature of the property and lack of immediate neighbours, the proposal would not cause any significant loss of light or privacy, nor have any dominant impact on neighbouring properties.

The proposal would comply with Policy CS19 of the Core Strategy 2014.

Parking and Highways

There are no changes to the parking or access arrangements. There would not be a significant impact on parking or highway safety. The proposal would therefore comply with Saved Policies T1 and P3 of the Local Plan 1994 and Policies CS11 and CS19 of the Core Strategy 2014.

Other Material Considerations

*Archaeology*

Section 20 of the NPPF 2026 recognises heritage assets as an irreplaceable resource, which should be conserved in a manner appropriate to their significance. This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets should always be preserved or enhanced. Saved Policy TC7 states that development on important archaeological sites will not normally be permitted.

Kent County Council's Archaeological Officer noted that remains associated with post medieval or earlier activity from the site being a post medieval farm holding may be revealed during groundworks and recommended a pre-commencement condition for a watching brief. However, as the new pool house element has been removed from the proposal, which now only relates to the reuse and replacement of existing buildings, it would not be reasonable to impose a pre-commencement condition for a watching brief. There are therefore no objections raised in relation to the relevant requirements of saved Policy TC7 of the Local Plan 1994, Policy CS20 of the Core Strategy 2014 and Section 20 of the NPPF 2026.

**Conclusion and Recommendation**

Subject to conditions, overall the proposals would not be inappropriate in the Green Belt and would preserve the character and appearance of the surrounding rural landscape. In addition, they would have no adverse impact on the architectural integrity or the setting of the listed buildings on the site. The proposals are also considered to be acceptable with regards to residential amenity, highway and heritage matters.

As such, the proposals would comply with the requirements of Policies CS02, CS11, CS12, CS19 and

CS20 of the Gravesham Local Plan Core Strategy 2014, saved Policies TC2, TC7, T1 and P3 of the Gravesham Local Plan 1994 and Sections 12, 13, 14, 17, 19 and 20 of the National Planning Policy Framework 2026.

The listed building consent and planning applications are therefore recommended for permission subject to conditions.

(For detailed conditions and informatives, see draft Decision)

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|---|---|---|---|
| **Case Officer:** | Mrs Katherine Parkin | **Team Leader:** | **Richard Hart** |
| **Signed:** | K. Parkin | **Signed:** | *R Hart* |
| **Dated:** | 19 August 2026 | **Dated:** | **20th August 2026** |