



Delegated Report

Permission in Principle Application

Application No:	20250686
Location:	Gralin Cottage, 53A The Street, Cobham, Gravesend, Kent, DA12 3BX
Description:	Permission in Principle application: change of use of a two bay garage to one bay and residential use together with a two storey extension forming a two bedroom dwelling for seniors with internal parking and two parking spaces.
Applicant:	Mr Graham Whiteford

Submitted Documents/Plans

- Application Form – dated 16 July 2025;
- Ordnance Survey Site Location Plan (scale – 1:1250);
- Drawing no. GW/2025/1 – Site Layout Plan, Site Section/Street Scene and Elevations as Proposed;
- Drawing no. GW/2025/2 – Existing and Proposed Floor Plans.

Relevant Planning History

Reference	Description	Decision	Decision Date
20120047	Application for minor material amendment to planning permission reference number 20110188 to increase the height of the roof on the dwelling and alterations to the fenestration.	Permitted	30.07.2012
20110926	Application for approval of condition 8(a)(b)(c), 10, 11 and 12 attached to planning permission reference number 20110188 relating to the external joinery, detailed drawings, external samples, archaeological evaluation, vehicle turning facility and the landscaping scheme.	Permitted	04.07.2012
20110188	Erection of a detached part two storey part single storey three bedroom dwelling with a detached double car port.	Permitted	08.06.2011

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change

- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC2 – Policy for Listed Buildings
- TC3 – Development Affecting Conservation Areas

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 16 – Conserving and Enhancing the Historic Environment

Other Material Considerations

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.

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)
- Cobham Conservation Area Appraisal (2017)
- Management Plan – Rural Conservation Area Appraisals (2016)

Consultations, Publicity and Representations

Part 2A, Paragraph 5J of The Town and Country Planning (Permission in Principle) (Amendment) Order 2017 sets out the consultation requirements of applications for Permission in Principle (PiP). It states that consultations should be undertaken for 14 days prior to a decision notice being issued and that the relevant consultees are set out in the Table in Schedule 4 to the Town and Country Planning (development Management Procedure) (England) Order 2015.

A site notice was displayed on site which expired on 30th July 2025. The Local Planning Authority received five objections from the consultation, which have been summarised below:

- Overdevelopment
- Not a suitable location for a new dwelling
- Loss of Privacy
- Narrow private road / Unsuitable access – risk to pedestrians

GBC Conservation Officer - The site is adjacent to Grade I Listed Buildings and is in a sensitive location within the conservation area. The proposed two storey extension is out of character and out of scale within its context, which should be preserved as open space with on the subordinate ancillary garage. Furthermore, the proposal is within close proximity of the dwelling and would cause harm to the setting of Listed Buildings. Finally, the design of the oast style extension is tokenistic, poorly illustrated for appropriate scale, and lacking any justification for the building form in this location.

The proposal is therefore contrary to local and national policy and cannot be supported.

Dickens Country Protection Society - The Society would comment that this would be a cramped form of development with little amenity and a difficult access in an area where Green Belt policies apply and new dwellings would not normally be permitted and in the Cobham Conservation Area.

No very special circumstances have been put forward to warrant overriding Green Belt policy.

Officer's Analysis

The application is made under the provisions of the Town and Country Planning (Permission in Principle) (Amendment) Order as amended. The proposal seeks permission in principle for residential development.

This consent route has two stages. The first stage establishes whether a site is suitable in principle. The second stage, i.e. the technical details consent, is where the detailed development proposals are assessed.

The current proposal relates to the first stage and therefore only the principle of the proposal in respect of its location, land use and amount of development can be considered. Issues relevant to these 'in principle' matters can be considered at this stage. However, other matters should be considered at the technical details consent stage.

The Local Planning Authority can inform applicants what they expect to see at the technical details consent stage but cannot impose planning conditions.

Site Description

Gralin Cottage is a chalet style bungalow located to the rear of properties on The Street. The property is an infill development, constructed after 2012 (ref. 20110188).

The property is accessed by a single track private accessway from The Street and benefits from a detached double garage.

Proposal

The proposal seeks permission in principle (PIP) for a two storey extension to and part conversion of the detached ancillary garage outbuilding into residential use to create a new two bedroom dwelling.

Principle of Development/Sustainability

The scope of consideration is limited to location, use and amount of development proposed with reference to the Development Plan and other material considerations, including the National Planning Policy Framework (NPPF).

There are certain limitations set out in the relevant Order. For the avoidance of doubt the proposed development is not:

- (a) Major development
- (b) Habitats development

- (c) Householder development
- (d) Schedule 1 development

The proposed development is not considered to be Schedule 1 or 2 development within the meaning of the EIA Regulations.

Location and Land Use

Gralin Cottage is located within the settlement boundary of Cobham and a short walk of The Street with bus routes, a village shop and public houses.

Due to the narrow scope of consideration allowable when assessing and determining a PiP, some usual planning issues are difficult to consider in depth, however the site is considered to be in sustainable location for new residential development with respect to access to local services and amenities and thus the proposed land use is acceptable, and the proposal meets the requirements of Policies CS01 and CS02 (LPCS) 2014 and the NPPF (2024).

Amount of Development

The proposal seeks (PIP) for the part conversion and extension to the existing garage to create a new residential property. The extension would be two storey and is shown on the plans to have an oast appearance:

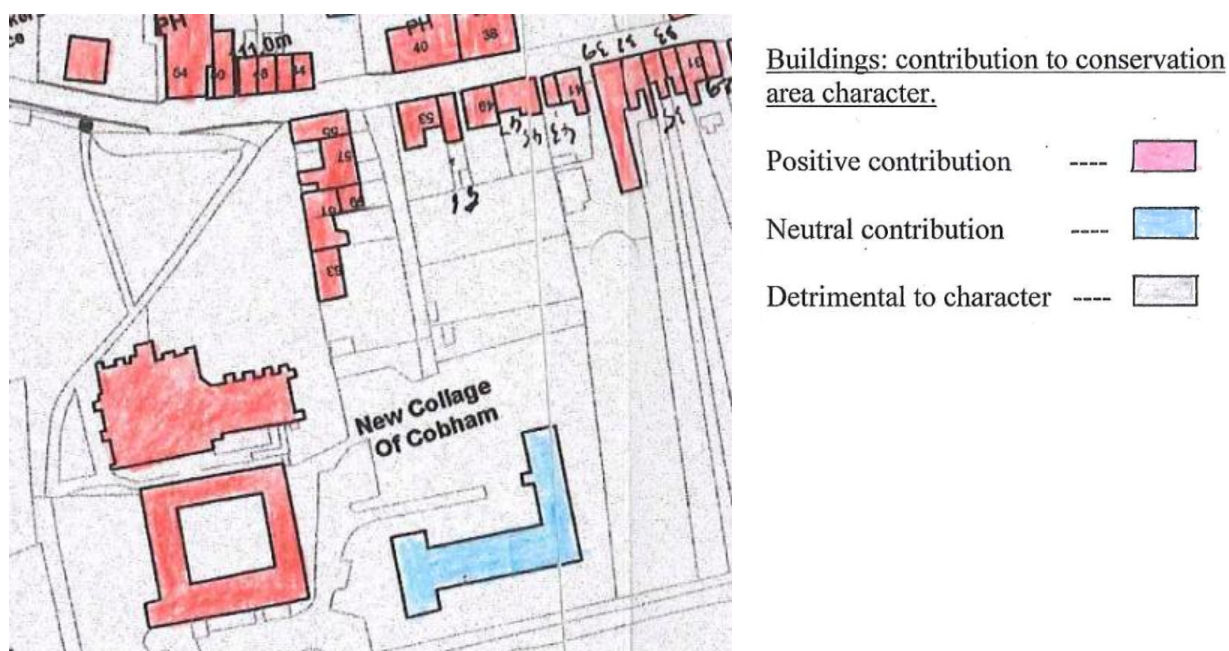


Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135 of the NPPF (2024) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character 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. Saved Policy TC3 (LPFR) also states that development is expected to make a positive contribution to the conservation area. As mentioned previously the application site is adjacent to Grade I and II Listed Buildings and within the Cobham Conservation Area.

As shown below (extract from the Conservation Area appraisal) the site is surrounded by historic buildings, which make positive contributions to the Conservation Area (application site outlined in red):

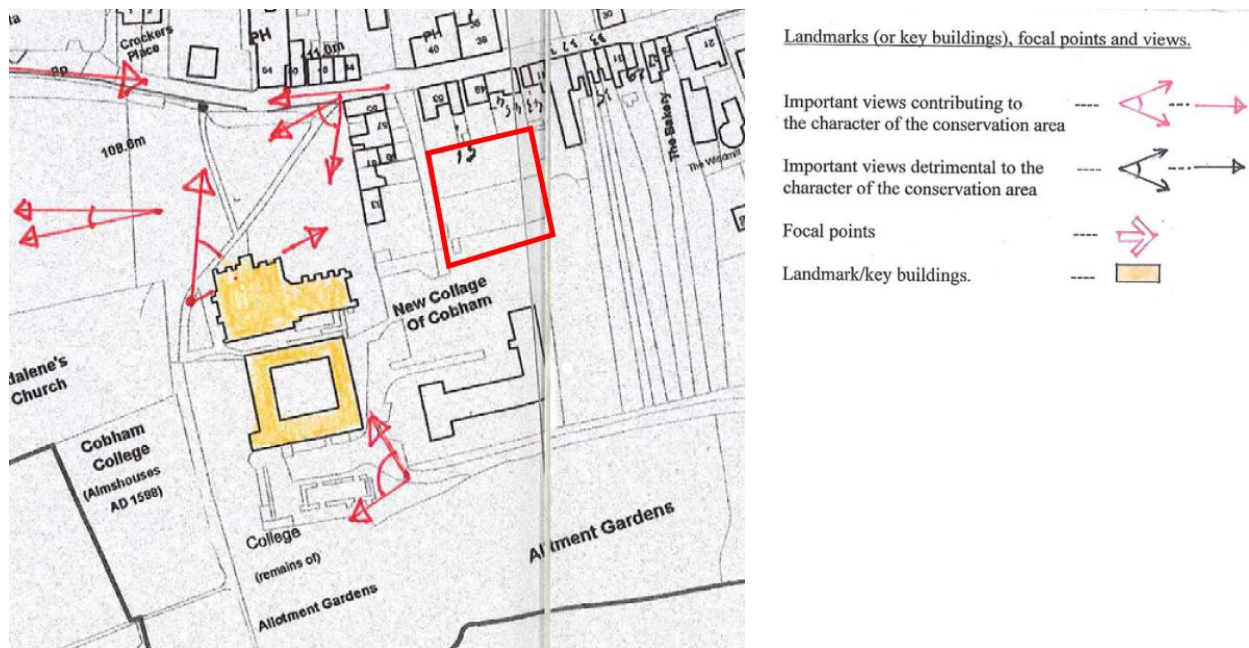


The application site is adjacent to a number of listed buildings, as shown in the annotated plan below:



Therefore even though the application site is a back land plot, it is within a sensitive location within the Conservation Area. This is demonstrated in the appraisal, which identified St Mary Magdalene's Church (Grade I Listed) as a key landmark building and the important views that contribute to the character of the Conservation Area. The map extract below highlights that the important view from the church would directly

look toward the application site and onto the extended and converted garage.



The Conservation Officer has reviewed the proposal, raising objection on the following grounds:

"The site is adjacent to Grade I Listed Buildings and is in a sensitive location within the conservation area. The proposed two storey extension is out of character and out of scale within its context, which should be preserved as open space with on the subordinate ancillary garage. Furthermore, the proposal is within close proximity of the dwelling and would cause harm to the setting of Listed Buildings. Finally, the design of the oast style extension is tokenistic, poorly illustrated for appropriate scale, and lacking any justification for the building form in this location."

It is noted that some of the design concerns are not material to this PIP application, however the scale of the development is considered to harm the setting of Listed Buildings. Therefore the proposal, due to its size and scale, is contrary to Policies CS19 and CS20 (LPCS) and saved Policies TC2 and TC3 (LPFR) which, amongst other things, require new development to conserve and enhance the character of the area and to protect heritage assets. Moreover, the proposed two bedroom property would constitute overdevelopment of the site.

Access and Parking

The plans show that the new dwelling would have dedicated parking for 2no. vehicles, and would utilise the existing private accessway. This accessway is shared by the application property and neighbours. As demonstrated in the Google Streetview image below, the access is a narrow single car track, which makes passing difficult and as such the introduction of new residential use and vehicles could result in the congestion on the highway and increase highway safety risk.



There would be additional information provided on highway matters at the detailed design stage, if the application were to be supported, however the narrow access is a concern and currently constitutes overdevelopment of the site.

Recreational Pressures on the Thames Estuary and Marshes Special Protection Area (SPA) and SAMMS

The Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites, which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy. Having considered a number of options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £337.49 for every new dwelling provided within 6km of the Ramsar site and SPA and for larger housing developments beyond 6km from them. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.

In this instance, the proposed development would result in the creation of 1 additional residential dwellings and as such, additional recreational activity would result. Therefore, it is considered that there would be an adverse impact to the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12 (LPCS). In such cases the Borough Council has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £337.49 per new dwelling unit.

The applicant has not paid the SAMMS Mitigation Contribution Agreement for the new residential property and therefore has not met the requirements of the Habitat Regulations and Section 15 (specifically paragraphs 192 and 193) of the NPPF (2024) and Policy CS12 (LPCS) (2014).

Planning Balance

There minimal positive economic and social benefits of the delivery of one self-contained dwelling in this

location. The new residential unit would be in a sustainable location and would offer a contribution towards the Council's 5 year housing target. In terms of the PiP assessment, the location and land use are acceptable in principle.

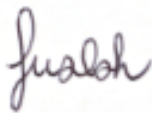
However, when considering the amount of the development, it is considered excessive in terms of size and scale. The negative features outweigh the positives of this application. The site is within Cobham Conservation Area surrounded by Listed Buildings. The proposed two storey extension and conversion of the ancillary garage outbuilding would be harmful to the setting of Listed Buildings and the wider Conservation Area. As the proposal would not enhance or preserve the designated Heritage asset and cause harm to Listed Buildings the application cannot be supported. As such, the proposal is contrary to Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014), saved Policies TC2 and TC3 of the Gravesham Local Plan First Review (1994) and sections 12 and 16 of the National Planning Policy Framework (2024).

The proposal also fails to secure a contribution towards strategic mitigation measures within the Thames Estuary and Marshes SPA/Ramsar Sites to resolve disturbance issues to wintering birds, and in the absence of this contribution or any evidence to inform an appropriate assessment, the development fails to comply with the requirements of the Habitat Regulations and paragraphs 193 and 194 of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

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:	16 th December 2025	Dated:	18 December 2025