

Delegated Report

Application No: 20250671

Location: Meadow Cottage 46 Beechwood Drive Meopham Gravesend Kent DA13 0TX

Description: Demolition of caravan and erection of a 3 bedroom dwelling.

Applicant: Mr Lee Cooper

Submitted Documents/Plans

The application comprises the following documents and plans:

- Site location plan (30 June 2025)
- Drawing no. 2187 BLOCK PLAN – Block Plan
- Drawing no. 2153 PROPOSED PLANS – Proposed Plans
- Drawing no. 2187 PROPOSED ELEVATIONS – Proposed Elevations
- Design and Access Statement (revised)

Relevant Planning History

The planning history relating to this site is summarised below.

<u>Application No.</u>	<u>Description</u>	<u>Status</u>	<u>Decision</u>
20230702	Raising and redesign of existing roof with gable walls front and rear, barn hip ends to the side and provision of two dormers to the front and rear elevation to provide two bed rooms and bathroom in roof.	Permitted	24.08.2023
19910788	Erection of single storey side extension to form kitchen/diner; reconstructure of link between lobby and bedrooms; erection of detached double garage.	Permitted	28.01.1992
19860573	Retention of new roof	Permitted	26.09.1986
19560156	Erection of a chalet for weekend and holiday use	Permitted	12.09.1956

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Courts have held that it is a matter of planning judgement as to whether a proposal is in accordance with the development plan when 'read as a whole' and conflict with a particular policy or policies may not pass that threshold.

Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

In this instance the development plan for Gravesham currently comprises: -

- The Gravesham Local Plan Core Strategy (September 2014);
- Remaining Saved Policies of the Local Plan First Review (1994); and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (2016, revised 2020).

Gravesham Local Plan Core Strategy (September 2014)

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale & Distribution of Development
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS18 – Climate Change
- Policy CS19 – Design & Development Principles

Saved Policies in the Gravesham Local Plan First Review (November 1994)

- 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 First 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 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- 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

Supplementary Planning Guidance

- SPG4 – KCC Parking Standards (2006).
- Landscape Character Assessment (2009)
- Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020.
- Design for Gravesham – Design Code SPD (2024).

Consultations, Publicity and Representations

Meopham Parish Council

No comments received.

KCC Biodiversity

SUMMARY: ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Further information to show if there is 25m² of vegetated habitat on site.
- If there is 25m² of vegetated habitat onsite, BNG information will be required.

BIODIVERSITY NET GAIN: DE MINIMIS

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from the 12th February 2024 and all minor applications from the 2nd April 2024.

The applicant has claimed an exemption from BNG (de minimis). This exemption only applies on sites where the loss/degradation of onsite habitat with a biodiversity value greater than zero does not exceed 25m² and/or 5 linear metres of habitat, as per The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Having reviewed the submitted information, we believe that this site may have over 25m² of habitat present (as shown in the photograph below) between 45 and 46 Beechwood Drive, and that the proposed development will result in habitat degradation. If this vegetated area is in excess of 25m² it does not meet the de minimis exemption requirements for Biodiversity Net Gain.

Should the applicant disagree with above, and there is not in excess of 25m² of vegetated habitat and it is exempt from BNG, additional information (including site photographs) will need to be provided on this area to clarify how, with the loss of this green space, the site meets the de minimis BNG exemption.

Should the applicant agree with this comment that over 25m² of vegetated habitat is present, as with any application that is required to achieve a 10% BNG, the following information must be submitted:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);

- the completed metric calculation tool showing the calculations of the pre development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and •
 - any available supporting evidence of this;
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

FURTHER CONSIDERATIONS

- Biodiversity enhancement plan
- Sensitive Lighting Plan

Neighbouring properties

Four surrounding properties have been consulted. One representation has been received raising concerns on the following grounds:

- Overlooking.
- There would be views into my living room, main bedroom and en-suite.

Analysis

The application site lies to the north of no. 46 Beechwood Drive and to the south of no. 45 Beechwood Drive and accommodates a caravan. This is in the ownership of the occupiers of no. 46 Beechwood Drive. This proposal involves the replacement of the caravan with a three-bedroom dwelling.

The site is located in a rural area, the Metropolitan Green Belt and the Higham Arable Farmlands Landscape Character Area.

Housing need

Hopkins Homes Ltd v Secretary of State for Communities and Local Government [2017] 1 W.L.R. 1865, Lord Carnwath reemphasised that the National Planning Policy Framework is only a material consideration in planning decisions and that planning applications should be determined in accordance with the development plan. Paragraph 12 of the NPPF expressly states that the starting point for decision-making is the development plan. Lord Carnwath as part of the Supreme Court decision stated,

It is important, however, in assessing the effect of the Framework, not to overstate the scope of this policy-making role. The Framework itself makes clear that as respects the determination of planning applications (by contrast with plan-making in which it has statutory recognition), it is no more than "guidance" and as such a "material consideration"

for the purposes of section 70(2) of the 1990 Act... It cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme.

It is a matter of law that all planning applications need to be considered in accordance with the legislation and relevant policy that applies at the point a decision is taken. The Council published a revised 5 year housing land supply statement in March 2023, it demonstrates that based on data up for the period 2022-2027, the Council can only demonstrate a land supply of 2.9 years.

Given the Council's current inability to demonstrate a 5-year housing land supply, and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Gravesham's Local Plan Core Strategy (LPCS) (2014) Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the National Planning Policy Framework (NPPF) (2024). This requires that in regard to housing development, planning permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;
- Land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);
- and areas at risk of flooding or coastal change.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the NPPF and established local planning policy taken as a whole.

Is the proposed development appropriate in the Green Belt?

The site is defined on the policies map of the Core Strategy as lying within the Green Belt and a rural area. In the consideration of this proposal, Policy CS02 of the Core Strategy 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 Local Plan Core Strategy. This site lies outside the confines of any rural settlements inset from the Green Belt.

National policies for protecting the Green Belt are set out in Section 13 of the NPPF. Paragraph 153 is particularly relevant in the consideration of planning applications within the Green Belt:

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

Paragraph 154 of the NPPF states that development in the Green Belt is inappropriate unless one of the listed exemptions applies. This is reproduced in full below:

Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i) mineral extraction;*
 - ii) engineering operations;*
 - iii) local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iv) the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - v) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - vi) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

Paragraph 155 is also applicable and is also reproduced below:

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

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

It is considered that none of the exceptions in paragraph 154 are applicable to this proposal. As the site is used to station a caravan, the proposal would not comprise the replacement of an existing building (exemption (d)). The quite widely dispersed pattern of development would not make this proposal an example of limited infilling (exemption (e)) and although the site for the proposed new dwelling may constitute previously developed land, it would fail to meet the test to "not cause substantial harm to the openness of the Green Belt" (exemption (g)). The issue of harm to the openness of the Green Belt is discussed in more detail below under the heading "The effect of the proposal on the openness of the Green Belt".

With respect to paragraph 155 it is considered that the proposal would fail to meet criterion (c) as it would not be in a sustainable location. The site is located some distance from local services and facilities. The nearest primary school, medical centre and local retail facilities are located on or near to Wrotham Road. It is likely that future residents would need to drive to these services and facilities. There is no dedicated footway or street lighting for the majority of the route to Wrotham Road. Furthermore, the road is narrow and as such would be unattractive for pedestrians, cyclists or those with mobility issues particularly during bad weather or in the dark. In addition, the application site is not located in proximity to public transport services. The nearest bus stops are located on Wrotham Road and the nearest train station is in Meopham. Due to the nature of the existing roads, it is unlikely that future residents would walk to the bus stops. And it would be highly likely that residents would need to drive to the train station. For these reasons it is considered that this proposal would not be in a sustainable location and as such would fail to meet criterion (c) of paragraph 155.

This is consistent with a recent appeal decision issued on 18 September 2025 relating to the "proposed change of use of an agricultural building into five holiday let accommodation units" at Abbey Farm Barn, Church Street, Higham, Rochester, Kent ME3 7LS (Gravesham planning reference 20240139). In this decision the Inspector assessed the issue of criteria (c) and whether the appeal site would be in a sustainable location as follows:

- 10. The appellant indicates that the appeal site should be considered 'Grey Belt' land. Criteria (c) of paragraph 155 requires that the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework.*
- 11. Paragraph 110 encourages the management of patterns of growth to support the objectives of promoting sustainable transport. Paragraph 115 requires that in*

assessing sites, it should be ensured that sustainable transport modes are prioritised taking account of the type of development and its location amongst other things.

12. *The appeal site is in a very isolated location in the countryside, located some distance from the nearest village of Lower Higham. Although the walking distance to the village would not be excessive, access is along an unlit country road with no demarcated footway. The nature of this route would be likely to deter pedestrian and cycling access to the village, particularly in the evenings and during the winter months. Moreover, the submitted evidence does not provide details of the shops or services provided within the village.*
13. *On balance, the proposal would not be located where future occupiers would be able to rely on accessible local services and facilities to serve their everyday needs without having to travel some distance and in all likelihood by car. Drawing the above together, the proposal would not be in a sustainable location and would therefore not comply with the exception regarding the development of Grey Belt land.*

Given the similarities relating to the isolated location of the appeal site and the current application site, the above conclusions are equally applicable to this proposal.

As none of the specified exceptions set out in paragraph 154 would apply and as all the criteria set out in paragraph 155 would not be satisfied, the proposal would constitute inappropriate development in the Green Belt.

In accordance with paragraph 153 of the NPPF, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. A discussion as to whether a case of very special circumstances exists in relation to this development is set out later in this report.

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

Paragraph 142 of the NPPF refers to the open character of Green Belts:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

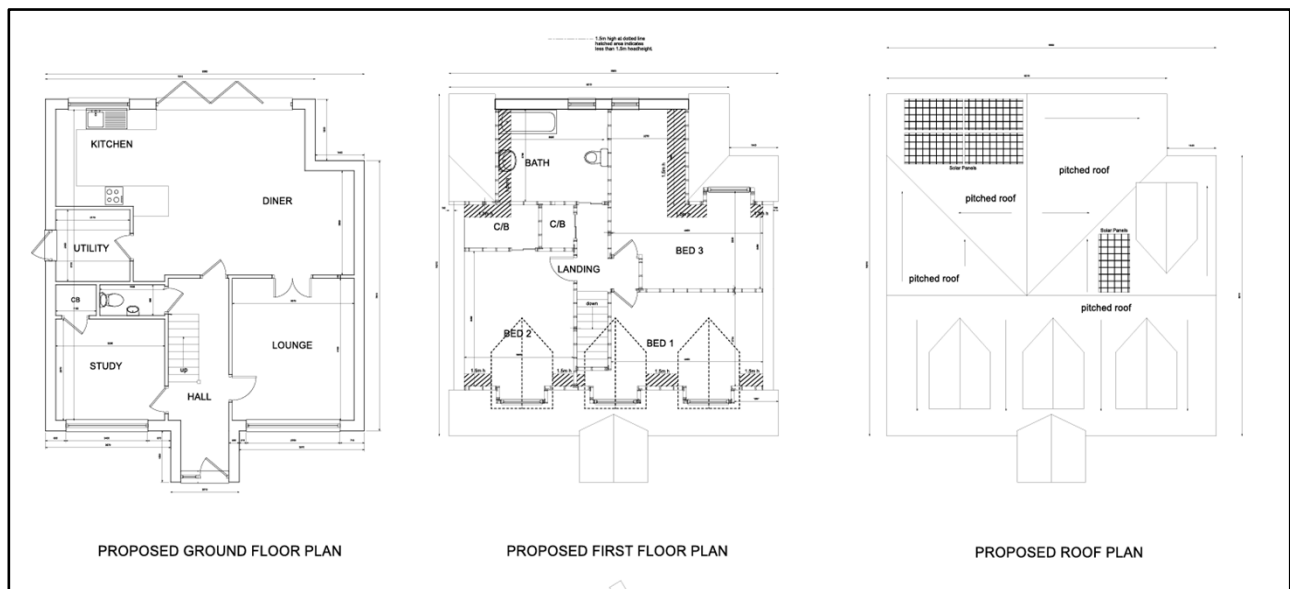
Planning Practice Guidance on Green Belts states that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

This proposal would introduce a significant development to the site in terms of footprint, volume and height. This is evidenced from the proposed elevations and floor plans:



Proposed elevations



Proposed Floor Plans

The size and visual impact of the proposed dwelling would clearly result in substantial harm to the openness of the Green Belt. The negative effect on the openness of the Green Belt would conflict with the aims of Green Belt policy as set out in paragraph 142 of the NPPF. It would also result in the proposal failing to meet the tests set out in paragraph 154(g) of the NPPF.

Design and visual impact

Section 12 of the NPPF relates to “achieving well-designed places” and sets out the Government’s requirements in relation to design issues. Paragraph 131 is particularly relevant:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The aims set out in paragraph 131 of the NPPF are reflected in Policy CS19 of the Core Strategy. This requires new development to be “visually attractive, fit for purpose and locally distinctive” and to “conserve and enhance the character of the local built, historic and natural environment”. It also requires new development to “integrate well with the surrounding local area”. In addition, Policy CS19 requires the following:

“...the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings.”

Design for Gravesham (2024) expands on the Core Strategy, and Policy CS19 in particular, to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

Beechwood Drive is characterised by dwellings of differing architectural styles which tend to be located on spacious plots. In this context, there is no objection to the design of the proposed dwelling *per se*. There are examples in Beechwood Drive of other properties that are of a similar scale and design. Although details of materials have not been provided, these would need to be of a high quality and would need to complement those used on nearby properties.

It is important to note that although the design of the proposed dwelling is considered acceptable, this does not overcome the more fundamental concerns relating to Green Belt issues as set out above.

Impact on landscape

Section 15 of the NPPF highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Policy CS12 of Gravesham Local Plan Core Strategy states that the overall landscape character and valued landscapes within the Borough will be conserved, restored and enhanced and that proposals will take account of the Gravesham Landscape Character Assessment.

The site is located within the Harvel Wooded Downs Character Area. The key characteristics are defined in the Gravesham Landscape Character Assessment as follows:

- *Varied topography with steep valley sides and plateaux*
- *Ancient woodland, chestnut coppice and small paddocks and pasture*
- *Traditional historic settlement of Harvel set around village green*
- *Occasional traditional farmsteads*
- *Haphazard mosaic of residential plots and small holdings set within the woodland*

The Gravesham Landscape Character Assessment states that the strong landscape elements

within the Harvel Wooded Downs should be conserved, whilst design standards should be defined to halt the erosion of the area with inappropriate development.

This area is characterised by a “haphazard mosaic of residential plots” which are enclosed by woodland. This proposal would further consolidate the sporadic built development within this locality which would erode the spacious, wooded character of the housing in this landscape area. It is considered that the proposal would therefore conflict with the characteristics of the Harvel Wooded Downs Character Area as identified in the Gravesham Landscape Character Assessment and would be contrary to Policy CS12 of the Core Strategy which seeks to conserve, restore and enhance the overall landscape character.

Impacts on residential amenity

Paragraph 135 of the NPPF requires planning decisions to, *inter alia*, provide “a high standard of amenity for existing and future users”. In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to “safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land”.

Privacy

The proposed dwelling would be unlikely to result in a loss of privacy to neighbouring occupiers. The main aspect of all the proposed windows is towards the front and rear of the property. As these views would be towards the highway to the front and garden area to the rear, these windows would not result in window-to-window overlooking or the loss of privacy to neighbouring garden areas. No windows are proposed in the side elevations of the building.

There are windows in the northern elevation of Meadow Cottage which face the application site. However, due to the separation distance between these windows and the private amenity area of the proposed new dwelling, there would not be a loss of privacy to future occupiers of the property.

Sunlight/daylight

The proposed dwelling would have similar front and rear building lines to the property to the north, no. 45 Beechwood Drive. There are no windows to habitable rooms within the southern elevation of this neighbouring property. Due to the siting and orientation of the new property in relation to no. 45 Beechwood Drive, there would be no significant loss of sunlight, daylight or outlook to the occupiers of this neighbouring property.

Due to the separation distance between the proposed dwelling and the existing property to the south, no. 46 Beechwood Drive, there would be no significant loss of sunlight, daylight or outlook to the occupiers of this property.

External space standards

Paragraph 9 and table two of the Council’s Residential Layout Guidelines set out the Council’s requirements for private amenity space for new dwellings. For dwellings with three bedrooms it requires a minimum garden area of 60m² and a minimum depth from the rear wall of the house of 10.0m. The proposed dwelling would exceed the minimum requirements set out in the Council’s Residential Layout Guidelines.

Internal space standards

The “Technical housing standards – nationally described space standard” was published by the Department for Communities and Local Government in March 2015. This document sets out requirements for the gross internal area of new dwellings at a defined level of occupancy as well

as floor areas and dimensions for key parts of the home.

The proposed dwelling would comprise a two-storey, three bedroom, six person dwelling. The required minimum gross internal floor area for such units is 102m². The gross internal floor area of the proposed dwelling would significantly exceed this standard.

In light of the above, this proposal would not have a detrimental impact on the amenity of neighbouring occupiers and would provide an acceptable level of residential amenity for future occupiers of the proposed dwelling. As such it would meet the tests set out in paragraph 135 of the NPPF and Policy CS19 of the Core Strategy.

Highway issues

Policy CS11 of the Core Strategy seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is provided in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. Saved Policy P3 of the Gravesham Local Plan First Review requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

The Kent County Council Vehicle Parking Standards require a maximum of two on-site parking spaces to serve a three bedroom dwelling. Although a detailed parking layout has not been submitted with the current application, the proposed block plan indicates that this level of parking could be provided to the front of the proposed dwelling. As such it is considered that this proposal would be acceptable in terms of highway safety.

Cycle and refuse storage

The current Kent County Council Vehicle Parking Standards provide minimum cycle parking standards. For residential dwellings there is a requirement of one space per bedroom. Although the submitted drawings do not indicate any cycle storage facility, this can be secured through an appropriately worded planning condition if planning permission were to be granted.

Paragraph 32 of the Council's Residential Layout Guidelines (2020) relates to refuse storage and contains the following requirement:

Refuse containers shall be provided on a hardstanding and within purpose built enclosures, which are readily accessible for collection.

Again, the submitted drawings do not indicate details of refuse storage, although if permission were to be granted this could also be secured by a planning condition.

Biodiversity net gain

The comments of KCC Biodiversity have been noted concerning the requirement for a 10% biodiversity net gain (BNG). Although the applicant has claimed an exemption from BNG (de minimis), this exemption only applies on sites where the loss/degradation of onsite habitat with a biodiversity value greater than zero does not exceed 25m² and/or 5 linear metres of habitat,

The submitted planning application appears to show that this site may have over 25m² of habitat present and that the proposed development will result in habitat degradation. If this vegetated area is in excess of 25m² it does not meet the de minimis exemption requirements for BNG.

The lack of information to demonstrate that the de minimis BNG exemption would be met or that a 10% BNG would be achieved forms a reason for refusal as set out in the recommendation below.

Very special circumstances

As set out above, the proposal is considered to be inappropriate development in the Green Belt. In accordance with paragraph 153 of the NPPF such development “should not be approved except in very special circumstances”. It advises that very special circumstances will not exist “unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

A case of very special circumstances has not been submitted with the application. Furthermore, for the reasons set out above, the lack of a five year housing supply by the Council would not constitute a case of very special circumstances required to enable the development to be supported. As such, it is considered that the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, would not be outweighed by other considerations.

Conclusion

In conclusion, it has been shown that this proposal constitutes inappropriate development within the Green Belt and would have a negative impact on the openness of the Green Belt. In the absence of a sufficiently strong case of very special circumstances this proposal must therefore be seen as contrary to existing Green Belt policy as set out in the NPPF and Policy CS02 of the Core Strategy.

In addition, there are concerns with respect to impact of the proposal on the landscape character of the Harvel Wooded Downs Character Area and the lack of information relating to BNG.

Recommendation:

Refuse planning permission

See draft Decision

Case Officer: Gary Edwards	Team Leader: Richard Hart
Signed: Gary Edwards	Signed: <i>R Hart</i>
Dated: 9 October 2025	Dated: 9th October 2025