

Delegated Report

Full Planning Application

Application No:	20250512
Location:	Brimsole Farm, Brimstone Hill, Meopham, Gravesend, Kent
Description:	Demolition of existing barns and car ports and 2no new build 3 bed dwellings with associated landscaping works.
Applicant:	Mr Adam Thompson
Site Visit:	08 July 2025

Submitted Documents/Plans

- Application Form – dated
- Planning Statement by DHA Planning (DHA/35241 – May 2025);
- Design and Access Statement by OPEN Architecture (ref. 24130-P001);
- Supplementary Information – Environmental Report by HESI (ref. 19458);
- Supplementary Information – Geotechnical Report by HESI (ref. 19458);
- Supplementary Information – Desktop Study by HESI (ref. 19458)
- Supplementary Information – Drainage Hydraulic Calculations by BdR Civil & Structural Engineers (ref. 25-0040);
- Supplementary Information – Drainage Specification Notes by BdR Civil & Structural Engineers (ref. 25-0040 C105000 – Rev. A);
- Supplementary Information – Preliminary Ecological Appraisal by Greenlink Ecology (ref. 23_1714_Report);
- Supplementary Information – Landscape and Ecological Management Plan by Christina Odell (ref. 2506-800);
- Supplementary Information – BNG Assessment and Metric by Christina Odell (dated 10 April 2025);
- Supplementary Information – Written Scheme of Investigation for Archaeological Watching Brief by Wessex Archaeology (ref. 20231221) (dated April 2025);
- Drawing no. 24130-E001 – Site Location Plan (scale – 1:1250);
- Drawing no. 16807/22 – Topographical Survey;
- Drawing no. 16808/22 – Rev. A – Existing Floor Plan Survey;
- Drawing no. 16809/22 – Rev. A – Existing Elevations Survey;
- Drawing no. 24130-P150 – Rev. P1 – Proposed Site Plan;
- Drawing no. 24130-P200 – Proposed Floor Plans;
- Drawing no. 24130-P450 – Proposed Elevations;
- Drawing no. 2506-100 – Rev. A – Ecological Landscape Masterplan;
- Drawing no. 2506-200 – Rev. A – Hardworks Plan;
- Drawing no. 25-0040-C10501 – Rev. A – Drainage Layout;
- Drawing no. 25-0040-C10525 – Rev. A – Post Development Area Plan;
- Drawing no. 25-0040-C10551 – Rev. A – Drainage Construction Details;
- Drawing no. 590003P – Rev. 01 – Alarm Unit for Septic, Cesspool and Silage Tanks.

Relevant Planning History

Reference	Description	Decision	Decision Date
20231221	Conversion of existing agricultural barns into two 3 bedroom dwellings, with associated car ports, garden and landscaping.	Permitted	26.01.2024
20230184	Conversion (change of use) of existing barn into new three bedroom dwelling with associated parking.	Permitted	28.04.2023
20150589	Application for a Lawful Development Certificate in respect of the existing self-contained residential use of the outbuilding known as 'The Lodge' and the material change of the land to establish a residential curtilage.	Certificate Granted	08.10.2015
19830705	Construction of a cesspool	Permitted	17.10.1983
19590047	Erection of dwellings	Application Refused	03.04.1959
19550213	Erection of dwellinghouses	Application Refused	07.09.1955
19520171	Siting of caravan for residential purposes	Permitted	11.03.1953
19520170	Siting of caravan for residential purposes	Granted Temporary Permission	05.09.1952
19490023	Erection of a Dutch Barn and grain store	Permitted	25.01.1949

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS14 – Housing Type and Size
- CS15 – Housing Density
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- C11 – Change of Use of Redundant Buildings in the Countryside
- C12 – Replacement Dwellings in the Countryside
- C13 – Extension to Dwellings in the Countryside
- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- T4 – Development Outside the Built-up Area
- T5 – Access to the Identified Highway Network

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 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 15 – Conserving and Enhancing the Natural Environment
- Section 16 – Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan (2021-2026)

Consultations, Publicity and Representations

External Consultees

KCC Ecology –

SUFFICIENT INFORMATION RECEIVED

A preliminary ecological assessment (PEA) has been completed (Greenlink, July 25) which has made an assessment of ecological constraints present onsite, and we are satisfied that impacts to protected species (breeding birds and bats) can be avoided through the implementation of precautionary working methods. The carport building was determined to be of low suitability for roosting bats, and a single emergence survey was undertaken. No evidence of roosting bats was recorded.

The PEA has been used to inform a Landscape and Ecological Management Plan and Landscape Masterplan (Christina Odell, April 25), which looks to provide suitable enhancement recommendations for improving the value of the site for biodiversity. This has been further evidenced within the production of the BNG metric and accompanying report (Christina Odell, April 25), where net gains of +0.14 habitat units (+56.27%) and +0.19 hedgerow units (1078.58%) have been demonstrated onsite. We consider these gains to be achievable and can be secured within the LEMP.

NESTING BIRDS – Informative

- *The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an*

offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

N.B.: It should be noted that some birds are capable of nesting outside of the core nesting period, especially where weather conditions are favourable. Birds such as feral pigeon, wood pigeon and barn owl have been recorded nesting in every month of the year. Care when removing bird nesting habitat may therefore be required at all times of year, with attention paid to the nesting habits of the species that could make use of the site and weather conditions at the time of clearance.

BATS – Informative

- There is a risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species Regulations 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or to contact the Bat Advice Service on 0345 1300 228, email enquiries@bats.org.uk or visit the Bat Conservation Trust website.*

ARTIFICIAL LIGHTING

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows¹⁰. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the NPPF 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 8 Bats and Artificial Lighting at Night' (or subsequent updates) should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

- No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity will result. Such details shall include layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. The subsequently approved details shall be retained thereafter.*

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024, paragraph 198(c).

BIODIVERSITY NET GAIN

A BNG metric and accompanying report (Christina Odell, April 25) have been provided, where net gains of +0.14 habitat units (+56.27%) and +0.19 hedgerow units (1078.58%) have been demonstrated onsite. Provided that these habitat creation/enhancement measures are securable (i.e. outside of residential curtilages), we consider these gains to be achievable.

This net gain is not considered to be significant due to the limited scale of the creation of medium distinctiveness habitats and the small unit uplift (less than 0.5 units). The creation and ongoing management of newly created habitats should therefore be secured through the production of a Landscape and Ecological Management Plan (LEMP).

A LEMP has been produced, The LEMP should also incorporate the enhancements proposed within the Biodiversity Enhancement Plan (Kent Design Studio, Dec 24) and the PEA (KB Ecology, Jan 25)

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.o [df](#). The applicant should submit a biodiversity gain plan form^[1] along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered.

[1] <https://www.gov.uk/government/publications/biodiversity-gain-plan>

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

A Landscape and Ecological Management Plan (LEMP) has been provided (Christina Odell, April 25) which demonstrates how BNG can be achieved onsite. This will be secured by condition and updated to include the locations and specifications of additional biodiversity enhancements (e.g. bat and bird boxes) as outlined within the PEA (Greenlink, July 25).

- *No development shall take place (including any ground works, site, or vegetation clearance), until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority addressing:*
 1. *Creation and enhancement of habitats in accordance with the Biodiversity Gain Plan;*
 2. *Management of on-site habitats to achieve biodiversity net gain in accordance with the Biodiversity Gain Plan;*
 3. *Biodiversity enhancement measures, including the recommendations of the PEA (Greenlink, July 25)*

The content of the LEMP shall use the recommendations within the existing LEMP (Christina Odell, April 25) and updated to include the additional biodiversity enhancements as recommended within the PEA (Greenlink, July 25). This will include the following:

- (a) *Purpose and conservation objectives for the proposed ecological design works;*
- (b) *Detailed design(s) to achieve stated objectives;*
- (c) *Extent and location/area of proposed works on appropriate scale maps and plans;*
- (d) *Type and source of materials to be used where appropriate, e.g. native species of local provenance;*
- (e) *Timetable for implementation*
- (f) *Persons responsible for implementing the works;*
- (g) *Details of initial aftercare;*

- (h) *Aims and objectives of management;*
- (i) *Prescriptions for management actions;*
- (j) *Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);*
- (k) *Habitat monitoring provisions;*
- (l) *Locations and specifications of suitably placed and durable biodiversity enhancement opportunities (e.g. bird and bat boxes)*
- (m) *Details of the individual, body or organisation(s) responsible for implementation of the plan.*

The LEMP shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

KCC Heritage –

The application has been made with a Written Scheme of Investigation (WSI) for an archaeological watching brief on groundworks at the site during development (Wessex Archaeology 2025). I would be happy for the submitted WSI to be approved and secured by an appropriate condition on any forthcoming consent.

Internal Consultees

GBC Environmental Protection –

A 'Desk Top Study Report' and 'Environmental Report' both by HESI have been submitted to address concerns raised with previous application on this site for the potential for contaminated land on this site. The Environmental Report included some initial intrusive investigation and ground gas monitoring. The soil sampling revealed, and area of PAH exceedances (WS1) and asbestos was found in WS4. Further sampling across the site is recommended to further assess the risk from these contaminants once full access can be obtained and additional round of ground gas monitoring are required. This is agreed with. Some remediation works will be required based on the results so far.

To address the above and other matters, the following are recommended:

CONTAMINATED LAND

- No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.
- a) Further site investigation, based on the findings of the 'Environmental Report' dated March 2025 by HESI (Report Ref: 19458) shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- b) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- c) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been

identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.

- d) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.
- e) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

WATCHING BRIEF

- The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

CODE OF PRACTICE ON CONSTRUCTION AND DEMOLITION

Please apply as appropriate

DRAINAGE AND SEWERAGE INFORMATIVE

- The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

LIGHTING

- Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

Neighbouring properties

A notice was displayed on site 11 June 2025.

In addition, six surrounding properties were consulted and one representation was received. The representation did not register objection or support for the development, but raised the following considerations:

- Potential damage to property through removal of carport
- Would the proposal be subject to building regulations

Should permission be forthcoming, relevant informatives relating to building regulations and the party wall act would be included. These are civil matters between neighbours and are not planning considerations.

The consultation period expired 02 July 2025.

Officer's Analysis

Site Description

The site is located on the eastern side of Brimstone Hill. It is served by a vehicular access through a timber gate and is set below highway level.

The site contains two barns and a carport. Barn 1 and Barn 2 are large, functional structures with shallow-pitched roofs and corrugated metal cladding. The timber-clad carport with a pitched roof and open front opposite the barns as well as stables to the north of the site.

The site is bounded by a farmhouse to the north and fencing to the south. The barns are detached with a separate car port/ storage outbuilding. To the west boundary of the site there is a pond which is an overflow for the surface water to the fields that feeds into the local water course via a well.

Development Proposal

This application proposes the demolition of the existing barns and car ports and the construction of 2no new build 3 bed dwellings with associated landscaping works.

The new dwellings would be chalet style bungalows, with dormer windows providing head height in the roof for habitable rooms. The dwellings would have the following dimensions:

- Depth – 11.5m
- Width – 8.6m
- Height (max) – 6m
- Height (eave) – 2.5m

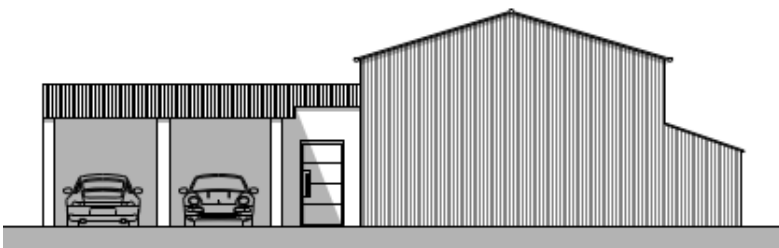
The dwellings would be finished in zinc and timber cladding, and are shown in the plan excerpts below:





Changes from previous approval (ref. 20231221)

The site benefits from planning permission for the “conversion of existing agricultural barns into two 3-bedroom dwellings, with associated car ports, garden and landscaping”, granted in January 2024. The plans below show the approved scheme:





This application seeks to demolish the existing agricultural barns and to construct 2no. detached 3 bedroom bungalows. While this is materially different to the approval, the approved residential use of the site is a material planning consideration for this decision.

Principle of Development

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

The principle issues in determining this application;

- Green Belt;
- The Effect on the Character and Appearance of the Area and Landscape;
- Residential Amenity;
- Parking and Highways; and
- Other matters.

Green Belt

1. Is the proposed development appropriate in the Green Belt?

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 142 of the NPPF 2024), with the Green Belt serving five purposes (paragraph 143):

- a) *to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Paragraph 153 of the NPPF (2024) states that inappropriate development is, by definition, harmful to the

Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt unless it falls within the specified exceptions of paragraphs 154 and 155 of the NPPF (2024).

The NPPF (2024) sets out a number of exceptions to certain types of development that are not 'inappropriate' under paragraph 154:

- (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.*

The applicant has not put forward any justification for the proposal, with regard to any relevant exception under paragraph 154 of the NPPF (2024), instead focusing the assessment on 'grey belt' (paragraph 155).

The only exception that could be relevant is 154 (g), which allows 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.

Is the site previously developed land?

The definition of 'previously developed land' (PDL) is set out in the Glossary (Annexe 2) of the NPPF (2024), and is defined as:

Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development

management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

The Local Planning Authority acknowledges that the site developed, however the barns are agricultural, and the glossary definition is clear that “previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings”. Therefore, the site is not previously developed land and paragraph 154 (g) is not relevant to the proposal.

Notwithstanding that the site is not PDL, a brief assessment of the impact on openness is set out below:

Does the development cause substantial harm to the openness of the Green Belt?

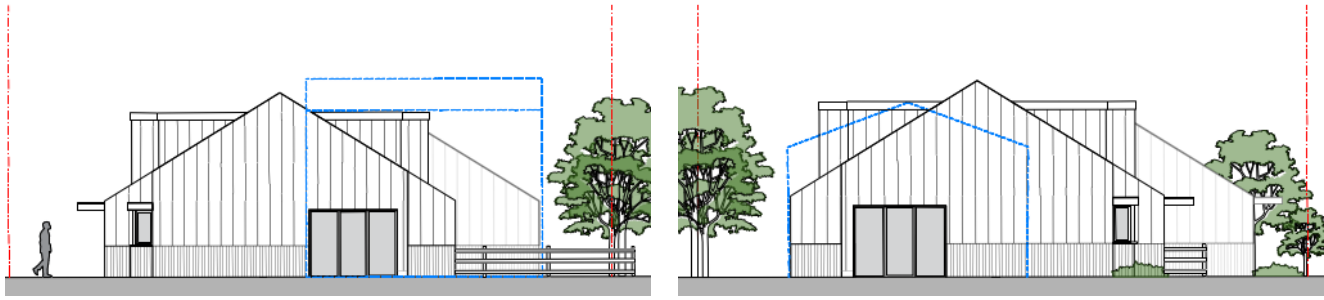
Referring back to paragraph 154(g) of the NPPF, redevelopment of previously developed land which does not cause substantial harm to the openness of the Green Belt. As set out above, the site is previously development and therefore it is relevant to consider if the proposal meets the stated fundamental aim of Green Belt policy that is to prevent urban sprawl by keeping land permanently open (paragraph 142). It also states that the essential characteristics of Green Belts are their openness and permanence.

The openness of the Green Belt has both spatial and visual aspects, and any new built form of development is harmful to its open character. The Courts have identified a number of factors to be taken into account when assessing the impact of a proposed development on the openness of the Green Belt (PPG Paragraph: 001 Reference ID: 64-001-20190722), which include both spatial and visual consideration, as well as duration and remediability of the development, and the degree of activity likely to be generated, such as traffic movement.

In spatial terms, the proposed development results in a reduction of built form within the Green Belt. The demolition of the existing structures, being the L-shaped buildings (2no. barns) and a detached carport, equates to 209m² of built form. The new dwellings would have a combined gross external footprint of 158.5m². Therefore, the proposal would reduce built form (-50.5m²) within the Green Belt and a reduced spatial impact on the openness. Furthermore, there is no significant increase in hardstanding proposed as part of the development and the spatial openness is not substantially reduced.

The reduction in built form would also reduce the visual impact on the openness (as demonstrated in the image below). However, the visual openness is also impacted by use, with new residential properties introducing parking spaces, residential paraphernalia and lighting. Although this would have negative impact on the visual openness of the Green Belt, the overall impact would not be substantial.





Moreover, the previous approval (ref. 20231221) is a material consideration. This approval was for the conversion of the existing buildings into residential properties and therefore this proposal would have a reduced impact on both spatial and visual openness than the previous approval.

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

Therefore, the proposed development is not considered to meet any exception under paragraph 154 of the NPPF (2024).

Grey Belt

Having considered all of the exceptions above, paragraph 155 of the NPPF (2024) needs to be considered and would be the most relevant for this pre-application proposal. This paragraph sets out that development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate, subject to all of the following applying:

- (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.*

(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*

The definition of 'grey belt land' is set out in the Glossary (Annexe 2) of the NPPF (2024) and is defined as:

Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

Footnote 7 states:

The policies referred to are those in this Framework (rather than those in development plans) relating to: 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.

The proposal is within the Kent Downs National Landscape (as shown in the map extract below) and is included in areas and assets of footnote 7 of the NPPF (2024). Therefore, if the site is to be considered Grey Belt, the application of local and national planning policy would not provide strong reasons for refusing or restricting development.



Impact on the Kent Downs National Landscape

The application site is located in the Kent Downs National Landscape (formerly known as an Area of Outstanding Natural Beauty) and the Luddesdown Downs Landscape Character Area (LCA) and as such, Policy CS12 (LPCS) is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Kent Downs AONB Management Plan (now known as the Kent Downs National Landscape Management Plan) will be taken into account in determining applications.

At national level, the NPPF (2024) attaches the great weight to conserving and enhancing landscape and scenic beauty of National Landscapes, with the scale and extent of development within these designated areas to be limited, sensitively located and designed in order to minimise adverse impacts (paragraphs 189 and 190). The NPPF guidance is furthered by Section 85 of the Countryside and Rights of Way (CRoW) Act 2000, which places a duty of regard on any relevant authority to seek to further the purpose of conserving and enhancing the natural beauty of a National Landscape. The new duty within S85 of the CRoW Act introduces the expectation of a higher level of satisfaction from LPAs to avoid harm to the Kent Downs National Landscape, with delegated or committee reports clearly demonstrating how proposals have actively sought to further the purposes of conserving and enhancing natural beauty, and be open to scrutiny thereto.

The Kent Downs National Landscape Management Plan highlights the importance of conserving and enhancing the natural beauty of the Kent Downs National Landscape (page 16). It sets out that the local character, qualities, distinctiveness and natural resources of the Kent Downs National Landscape will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development

(Principle SD2). That development should conserve and enhance the character and qualities of the Kent Downs National Landscape rather than detracting from it (Principle SD3). That new proposals should conserve and enhance tranquillity and where possible dark night skies (Principle SD7). Furthermore, the Plan will ensure that proposals do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs National Landscape (Principle SD8).

Therefore, local and national planning policy attach the highest status to the protection of National Landscapes to conserve and enhance their landscape and scenic beauty, with new development to only be supported with the LPA required to ensure the highest standard of design and in appropriate locations.

This proposal would change the character of the site, through the removal of agricultural barns and their replacement with residential properties. However, in landscape terms the development would not result in any significant loss of vegetation or existing landscaping and is sandwiched between residential properties. The new dwellings have been carefully designed and will adopt appropriate materials (subject to conditions) to have a rural barn-style appearance, which is suitable for the National Landscape. Furthermore, the proposal would result in a reduction of size and bulk of buildings within the landscape, and the lower density and height, along with the set-down from highway level, would enable greater views onto the valley to the east. Therefore, the demolition and redevelopment would not be excessive or harmful to overall landscape quality or its scenic beauty, and this would be improved further through landscaping conditions to ensure that development is suitably screened and softened in the landscape.

Moreover, a permission was granted in 2024 (20231221) for the conversion of the existing barns into residential properties, which can be implemented, and therefore the residential use of the site, as well as the associated paraphernalia, parking and lighting impacts are a material planning consideration. In order to ensure that factors such as lighting do not impact the scenic beauty of the landscape and the dark night skies, planning conditions will be attached should permission be forthcoming.

Therefore, subject to conditions, the proposed development would not be detrimental to landscape character and planning policies do not provide strong reasons for refusing the proposed development.

Whether the site is Grey Belt Land?

Paragraph 155 (a) has two parts. One is the assessment of the land as grey belt (above) and the second part is a determination of whether the development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

- (a) *Check the unrestricted sprawl of large built-up areas*
- (b) *Prevent neighbouring towns merging into one another*
- (d) *Preserve the setting and special character of historic towns*

The largest built-up area closest to the application site is the Meopham, which is approximately 2km to the north-west. The site is therefore not contributing to the unrestricted sprawl of large built-up areas. In relation to (b) the land is not close to a town and therefore does not prevent neighbouring towns merging into one another. The area is not a historic town point (d) does not apply.

Therefore, the proposal will not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

In order to meet exception 155 of the NPPF (2024), the development is subject to all of the remaining points applying:

- (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.

(b) There is a demonstrable unmet need for the type of development proposed

In *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 that planning applications should be determined in accordance with the development plan. Paragraph 12 of the National Planning Policy Framework (NPPF) (2024) 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 February 2025, it demonstrates that based on data up for the period 2024-2029, the Council can only demonstrate a land supply of 3 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:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- 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.

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 NPPF paragraph 194)
- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- (National Landscape) Areas of Outstanding Natural Beauty
- Irreplaceable habitats
- Designated heritage assets (& other heritage assets of archaeological interest, see NPPF footnote 75)
- 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 (paragraph 129(c)) in context, 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.

The proposed development for a net increase of '2' residential units would offer a minimal contribution towards meeting this local need and, accordingly, officers considers that this should be accorded

appropriate weight in support of the application. However, this has to be balanced against other requirements of the Development Plan and NPPF (2024) which requires new development to contribute positively to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

In the dismissed appeal on this site (ref. APP/K2230/W/23/3336159) the Inspector considered that *“there would be a benefit arising from the delivery of an additional market dwelling. As the Council only demonstrates a 2.9 year supply of housing land”* and attached only *“moderate weight to the delivery of a single dwelling”*, acknowledging that *“there would be economic benefits arising during the construction and occupation stages of the development. Biodiversity net gain could be secured by condition. However as a scheme for a single dwelling, these benefits would be limited.”*

(c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework

The NPPF (2024), taken as a whole, represents the Government's view of what constitutes sustainable development. Paragraph 84 of the NPPF (2024) provides specific advice on sustainable development in rural areas and seeks to avoid new isolated homes in the countryside unless there are special circumstances, which are listed as follows:

- a) *there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- b) *the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- c) *the development would re-use redundant or disused buildings and enhance its immediate setting;*
- d) *the development would involve the subdivision of an existing residential building; or*
- e) *the design is of exceptional quality, in that it:*
 - i. *is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
 - ii. *would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.*

This is continued in paragraphs 110 and 115 of the NPPF (2024) which seek to focus significant development in locations which are or can be made sustainable, through limiting need to travel/offer a genuine choice of transport modes, with safe and suitable access for all users. It should be acknowledged that paragraph 110 of the NPPF (2024) acknowledges that opportunities to maximise sustainable transport solutions vary between urban and rural areas.

Policy CS11 (Transport) sets out the importance of walking and cycling being the first choice of transport for people for short journeys as the most sustainable form of transport. This is echoed in paragraph 115 of the NPPF (2024) and the National Design Guide, where access to amenities should be safe and secure for all pedestrians and for persons with mobility needs. It is therefore considered that Policy CS11 (LPCS) is consistent with the aims of paragraph 115 (NPPF) and the National Design Guide (2021).

In this case, the application site is located on a narrow country lane. The closest settlements are Hook Green Meopham (Second Tier Settlement) and Meopham Green (Third Tier Settlement), which are both approx. 2.1km from the application site. These settlements contain a number of facilities, including schools, village hall, pubs, restaurants and supermarkets. The nearest bus routes to the site are on Wrotham Road (A227). Wrotham Road is served by a number of bus routes, which provide access to Gravesend, Sevenoaks, Rochester and Higham. However, the bus stops on Wrotham Road are located approx. 1.3km from the application sites access and would require residents to walk on unlit and narrow country lanes, without footways until Wrotham Road (approx. 1.3km from the application site). As such, the proposal does not offer a genuine choice of transport modes and is car reliant, with no safe access to bus routes, and is an unsustainable location, which is a position supported by a recent appeal decision on White Post Lane, Cobham, Gravesend (APP/K2230/W/25/3363212) where the Inspector considered the location unsustainable by virtue of reliance on motor vehicles.

A recent appeal decision was dismissed by the Inspectorate under similar circumstances (APP/Q4625/W/24/3352513). In the decision the Inspector acknowledged that paragraph 110 of the NPPF (2024) requires that opportunities to maximise sustainable transport between rural and urban areas must be recognised and taken into account in decision making, as well as the flexibility that this allows. However, concluded that “the lane, which is unlit, has no footways and is not overlooked would not provide a safe environment for pedestrians or cyclists. Nor are there links to a pedestrian, cycling or public transport network” and while there were dwellings nearby, that “the overall thrust of the Framework is to focus development on area where sustainable and safe transport choices can be made”. The Inspector therefore considered the location unsustainable due to a dependence of private vehicles with limited opportunities for alternative modes of transport.

Another appeal saw the Inspector dismiss a housing development on grey belt land due to limited service and facilities, and the access to the nearest settlement for shops, services and facilities would mean future occupier reliance on cars, with pedestrians being required to walk on a narrow rural road with no footways or streetlighting before a bus category A road (APP/F2360/W/25/3359228). This is a similar situation to the application site, with Meopham only accessible by narrow lanes of Brimstone Hill and Foxendown Lane, unlit and without footways, before coming to the busy A227 which would connect occupiers with facilities.

The Planning Statement acknowledges that the site is outside of the defined settlement boundary, but asserts that the site is in a sustainable location within walking and cycling distance of services and facilities (schools, village hall, pubs, restaurants and supermarkets) and reverts to text from the previous delegated report (ref. 20231221):

“There are bus stops, services and facilities all within walking distance on Wrotham Road to the west of the site (less than a mile away), which would provide a reasonable degree of accessibility from the site by means other than the car, and contribute to the rural community in line with paragraph 83 of the NPPF”

While the distance to services and facilities is not disputed, the accessibility of these services to people utilising sustainable modes of transport is not accepted. The narrow unlit lanes and lack of footway means that the development is car dominant and unsustainable, as supported by the appeal decisions.

Therefore, the sites rural location and taking into account the lack of choice in sustainable transport options the proposed development is not considered to meet the requirements of paragraph 110 and 115 of the NPPF (2024) and Policies CS01, CS02 and CS17 (LPCS). As such, the proposal would not be sustainable and not meet exception (d) of paragraph 155 of the NPPF (2024).

Very Special Circumstances

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

The applicant has not presented any very special circumstances within the submission.

The Local Planning Authority consider that there would be a moderate benefit from the delivery of two additional dwellings and limited benefits from economic activity and biodiversity gains that would arise through the development. However, these considerations alone would not outweigh the harms previously identified.

The previous planning permission (ref. 20231221) for the conversion of the barns into residential properties are material considerations and must be weighed up in the decision-making process. This permission was granted in January 2024 and therefore is live and can be implemented. As set out previously in this report, the approval was to convert the barns into residential accommodation, retaining the existing built form on the site and introducing residential properties in this location. The current proposal would reduce the extent

of built form on the site and although in an unsustainable location, the fallback position would enable residential development on this site.

Overall, in acknowledging previous permission and the additional benefits arising from the development, the current proposal would have less impact on the Green Belt and would be for residential development in the same location. Therefore, the Local Planning Authority find that other considerations collectively would outweigh the harm to the Green Belt and the other harms resulting from the proposal, in line with the provisions of the NPPF (2024).

Final Balancing of Inappropriateness in the Green Belt

The development is inappropriate development within the Green Belt by virtue of being in an unsustainable location contrary to paragraph 155 (c) of the NPPF (2024). However, very special circumstances collectively exist to justify the proposal, through the Councils unmet housing need, additionality benefits and through the live planning permission for the conversion of the existing barns which would cause greater harm to the Green Belt and enables residential use of the site.

Therefore, on balance, the proposal is in accordance with paragraph 153 of the National Planning Policy Framework (2024).

The Effect on the Character and Appearance of the Area and Landscape

The application site is located in the Luddesdown Downs Landscape Character Area (LCA) and as such, Policy CS12 (LPCS) is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.

According to the Gravesham Landscape Character Assessment, the Luddesdown Downs LCA is characterised by very undulating topography with arable and pasture farmland, native woodland, narrow winding lanes with properties and farmsteads located along them. The overall condition of the landscape is good, and it has high sensitivity. The document recommends conserving its distinctive landscape features in order to maintain its character and quality, including conserving woodlands and hedgerows, narrow lanes, and ensuring development maintains the sparse and distinctive character of built development.

Policy CS19 (LPCS) requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. In particular, the design of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene and the character of the area.

As referenced previously (National Landscape Assessment), the proposal would change the character of the site, through the removal of agricultural barns and their replacement with residential properties. However, in landscape terms the development would not result in any significant loss of vegetation and the site is sandwiched between residential properties. The proposal would result in a reduction of size and bulk of the existing buildings, and therefore the demolition and redevelopment would not be excessive or harmful to overall landscape quality. Therefore, the proposed development would not be detrimental to landscape character.

Furthermore, the proposed dwellings would be low level, chalet style bungalows, with gable ends and flat roof dormer windows. The dwelling would be finished in zinc and timber cladding, which alongside the design of the bungalows have been chosen to maintain a barn like façade, in keeping with the rural location. They are not excessive in size or bulk and would be in keeping with the rural location through choice of appropriate materials. Due to the topography of the site, the properties are set-down below the highway and therefore, their low level design would enable greater views out onto the valley to the east from public vantage points.

Overall, the proposed outbuilding is well designed and accords with Policies CS12 and CS19 (LPCS) and Section 12 and 15 of the NPPF (2024).

Residential Amenity

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). Paragraph 198 of the NPPF (2024) seeks to ensure that new development takes into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. The impact on amenity is also considered with regard to the criteria within Policy CS19 (LPCS), 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 and avoid adverse impacts from pollution.

Amenity of Future Occupiers

Policy CS19 (LPCS) requires that all development should be 'fit for purpose' and be 'adaptable to allow changes to meet the need of users' and that 'the design and layout of new residential development, including conversion, will accord with the adopted Residential Layout Guidelines' (RLG) (2020). Moreover, on 25 March 2015 the Government issued a written ministerial statement, which introduced new technical housing standards in England and set out how these would be applied through planning policy. These standards came into effect on 1 October 2015.

The proposed dwelling has a gross internal floor area of 137m², which complies with the nationally described space standard minimum for a three bedroom, two storey property (93m²). Notwithstanding the National Space Standards, Gravesham's RLG breaks down the Council's individual requirements for certain rooms, these have been formulated into a table to compare with the floor area of rooms within the proposed dwelling:

	Gravesham RLG (2020)	Proposed Dwelling 1	Proposed Dwelling 2
Living Room	13.2m ²	18.4m ²	18.4m ²
Kitchen/Diner	12m ²	31m ²	31m ²
Utility	-	4m ²	4m ²
w.c.	1.3m ²	3.6m ²	3.6m ²
Bedroom (double)	11.5m ²	14.8m ²	14.8m ²
		12m ²	12m ²
Bedroom (single)	7.5m ²	9.6m ²	9.6m ²
Bathroom & w.c.	3.5m ²	4.65m ²	4.65m ²
	3.5m ²	6.75m ²	6.75m ²

Table 2 has been colour coded (green complies, red fails) to show which rooms within each flat meet the guidance within the RLG. The table demonstrates that all rooms within the dwelling comply with Gravesham's RLG and that the dwelling would provide a good quality living environment for future occupiers.

In terms of garden space, the proposed dwellings would have private amenity space, measuring 157m² and 142m². The garden depths vary as the majority of the amenity spaces are to the side of the properties,

however, the areas accord with the minimum recommended garden sizes for three bedroom properties set out in Gravesham's RLG (60m²).

Overall, the development is considered to provide good quality living environment for future occupiers in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Impact on Amenity of Surrounding Properties

The proposed development is not considered to impact the amenity of any adjoining properties through overlooking, light, outlook or sense of enclosure.

The Farmhouse is detached, forward of the barns and oriented at a right angle to them. The distance of this property from the proposed bungalows (approximately 16m at the closest point) will not have any amenity impact. The bungalows will not have any direct, harmful impact on The Farmhouse in terms of loss of privacy, light, outlook or sense of enclosure.

Due to its proximity immediately adjacent the northern boundary, the main property that would be affected by the proposal would be The Cottage. This property adjoins the proposed car port, which is attached to the eastern side of the property, as seen in the images above and below.



The new dwellings have been designed with staggered depths, which ensures that dwelling 1 (located closest to The Cottage) is set back from its flank wall. The layout of the proposal means that the daylight, outlook of the will be safeguarded, and there would be no sense of enclosure impacts. Furthermore, the garden of The Cottage is located to the front of the property, which would be obscured from view and not overlooked by the new dwellings.



Overall, the proposed development would safeguard neighbour amenity in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Parking and Highways

The proposed development needs to be considered against Policy CS11 (LPCS) which states that new development should mitigate their impact on the public highway and that transport assessments should be provided and implemented to ensure delivery of travel choice and sustainable opportunities for travel. Furthermore, it states that sufficient car parking in new developments will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport accessibility to services and facilities. This is also reflected by Saved Policy T1 (LPFR) which requires proposed development to be adequately served by the highway network and Saved Policy P3 (LPFR) which sets out highways parking standards for development.

At a national level the NPPF (2024) states at paragraph 110, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The NPPF (2024) goes on to state development should only be prevented or refused on transport grounds where the cumulative impact of development is severe.

The new dwellings would have three bedrooms and would have two parking spaces per dwelling, which accords with Gravesham's adopted parking standards (SPG 4) (2006). There is also sufficient space within the site for turning, including larger vehicles such as a tanker to empty the cesspool.

Due to the proposed use for a two dwellings and the low and slow traffic levels, there would not be a significant impact on highway safety from the proposal, which would comply with Saved Policies T1, T5 and P3 (LPFR) and Policies CS11 and CS19 (LPCS).

Other matters

Refuse Arrangements

Policy CS19 (LPCS) requires new development to incorporate appropriate facilities for the storage and recycling of waste.

The supporting information and plans do not provide any detail on the bin stores or collection strategy for the proposed dwellings.

Subject to conditions as set out above, the proposal is in accordance with Policy CS19 (LPCS) and would incorporate appropriate facilities for storage and recycling of waste.

Archaeology

The site lies within an area of general multi-period archaeological potential and the site itself is a historic farmstead recorded on historic mapping since at least the mid-19th century.

The application has been supported by a Written Scheme of Investigation (WSI) for an archaeological watching brief on groundworks at the site during development (Wessex Archaeology 2025), which has been reviewed by KCC Heritage. There is no objection to the WSI, subject to a condition securing its implementation.

On this basis, the proposal is in accordance with Policy CS20 (LPCS) and paragraph 216 of the NPPF (2024).

Contaminated Land

Policy CS19 (LPCS) indicates that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination.

Paragraph 187 of the NPPF (2024) indicates that planning decisions should contribute to and enhance the natural and local environment by, amongst other things:

- e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; and*
- f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

The application has been supported by a Phase I and Phase II Geo-environmental and Geotechnical Investigation Report by Hesi, which have been reviewed by GBC Environmental Protection Officers. There is no objection to the development relating to contamination, however Environmental Protection Officers have recommended a contaminated land condition be attached, with a prior to commencement trigger.

Therefore, subject to conditions the proposal complies with Policy CS19 (LPCS) and paragraph 187 of the NPPF (2024).

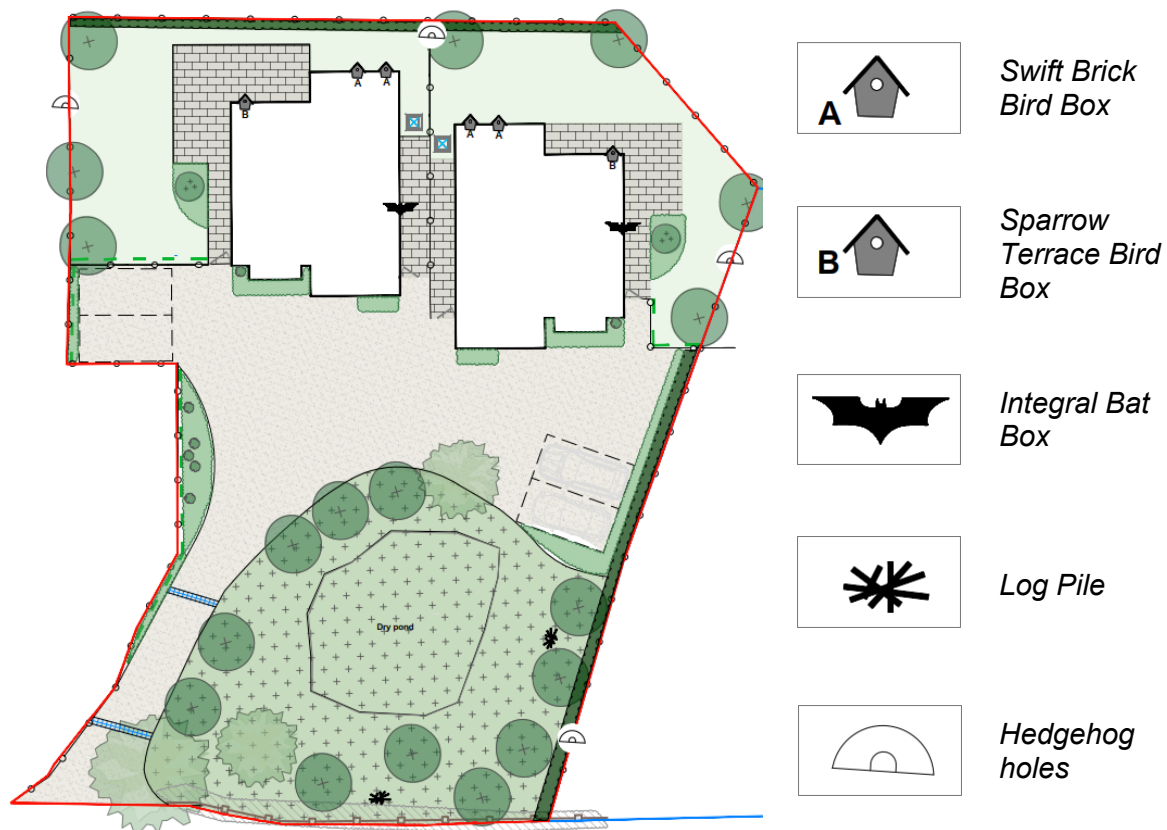
Biodiversity Enhancement and Ecology

The application site is located in a Biodiversity Opportunity Area (BOA) and adjacent to the Strawberry Hill Pasture and Woodland, Meopham Local Wildlife Site (LWS) which adjoins southwestern boundary. As such, Policy CS12 (LPCS) is relevant. It states that there will be no net loss of biodiversity in Gravesham and that opportunities to enhance, restore, recreate and maintain habitats will be sought, particularly within Biodiversity Opportunity Areas.

The application has been supported by a preliminary ecological assessment (PEA) by Greenlink, which has been reviewed by Kent County Council Ecology. KCC are satisfied that the impacts to protected species can be avoided through the implementation of precautionary working methods set out in the PEA.

The PEA has informed a Landscape and Ecological Management Plan and Landscape Masterplan, which would provide suitable enhancement recommendations for improving biodiversity and biodiversity opportunities on the site.

The biodiversity enhancement plan demonstrates the following:



KCC Ecology consider these to be acceptable and recommend that a Landscape and Ecological Management Plan condition is attached to the decision notice. Overall, the proposal is considered to provide enhancement to biodiversity opportunities and subject to conditions relating to securing the enhancements, soft landscaping improvements and lighting, the proposal accords with Policy CS12 (LPCS).

Biodiversity Net Gain

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The application has been supported by a BNG metric and accompanying report produced by Christina Odell, which demonstrates onsite net gains of +0.14 habitat units (+56.27%) and +0.19 hedgerow units (1078.58%). KCC Ecology have reviewed the BNG documents and are satisfied that these gains are achievable, providing these habitat creation creation/enhancement measures are securable.

KCC do not consider this net gain to be significant due to the limited scale of the creation of medium distinctiveness habitats and the small unit uplift (less than 0.5 units). The creation and ongoing management of newly created habitats would be secured through the production of a Landscape and

Ecological Management Plan (LEMP). The LEMP should also incorporate the enhancements proposed within the Biodiversity Enhancement Plan (Kent Design Studio, Dec 24) and the PEA (KB Ecology, Jan 25).

If planning permission is granted, the applicant should submit a biodiversity gain plan form along with supporting information once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered.

Conclusion and Planning Balance

The proposed development is inappropriate development within the Green Belt and in an unsustainable location, however very special circumstances collectively exist to justify the proposal. These very special circumstances include the delivery of housing to contribute to the Councils unmet housing need, additionality benefits such as employment and biodiversity net gains, and pertinently the live planning permission for the conversion of the existing barns which would cause greater harm to the Green Belt and enables residential use of the unsustainable site. Therefore, in accordance with paragraph 153 of the National Planning Policy Framework (2024) the very special circumstances exist and outweigh the harm to the Green Belt by reason of inappropriateness.

The new dwellings are well-designed, at a lower scale and density to the existing buildings and through landscaping would preserve and enhance the scenic natural beauty of the Kent Downs National Landscape, opening views out onto the valley beyond and promoting biodiversity on the site. Furthermore, the proposal will safeguard both future occupier and neighbouring amenity, will have no impact on the highway network and achieve 10% biodiversity net gain.

Therefore, subject to conditions, the proposal is in accordance with local and national planning policy, and it is recommended that planning permission is granted.

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	30 th September 2025	Dated:	3 rd October 2025