

Land known as Leasden

Rhododendron Avenue

Meopham, Kent

Proposed 2 bedroom bungalow to replace a dilapidated chalet on the plot, along with hardstanding for 2 cars and associated access path

Planning Statement

February 2025



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Appendix A- Pre-application response

1. Introduction

This planning statement supports an application for the construction of a single-storey, 2-bedroom bungalow on land identified as Leasden, Rhododendron Avenue, Meopham, Gravesend. The proposal seeks to replace a dilapidated structure on the site with a new dwelling, including the formation of vehicle parking and access, as well as a rear patio area. This planning statement aims to address the relevant planning considerations and demonstrate that the development is in accordance with the policies of Gravesend Borough Council, the National Planning Policy Framework (NPPF), and other material planning considerations.

2. Site and Proposal Overview

The application site is situated within the Green Belt, an Area of Archaeological Potential, and a Groundwater Source Protection Zone 3. The site was previously overgrown but has been cleared and the existing structure remains in situ. This existing building was originally a chalet for weekend and holiday use. The existence of a structure on this land and its historic use for holiday accommodation constitute previously developed land.



1960 aerial view of the plot and the existing structure in situ.



Building showing on a historic OS map.



Building showing on historic land registry records.



A 2024 aerial view of the site.



Building still in existence on a recent OS map.



Existing building currently on site.



Photograph of the site prior to the removal of the trees.

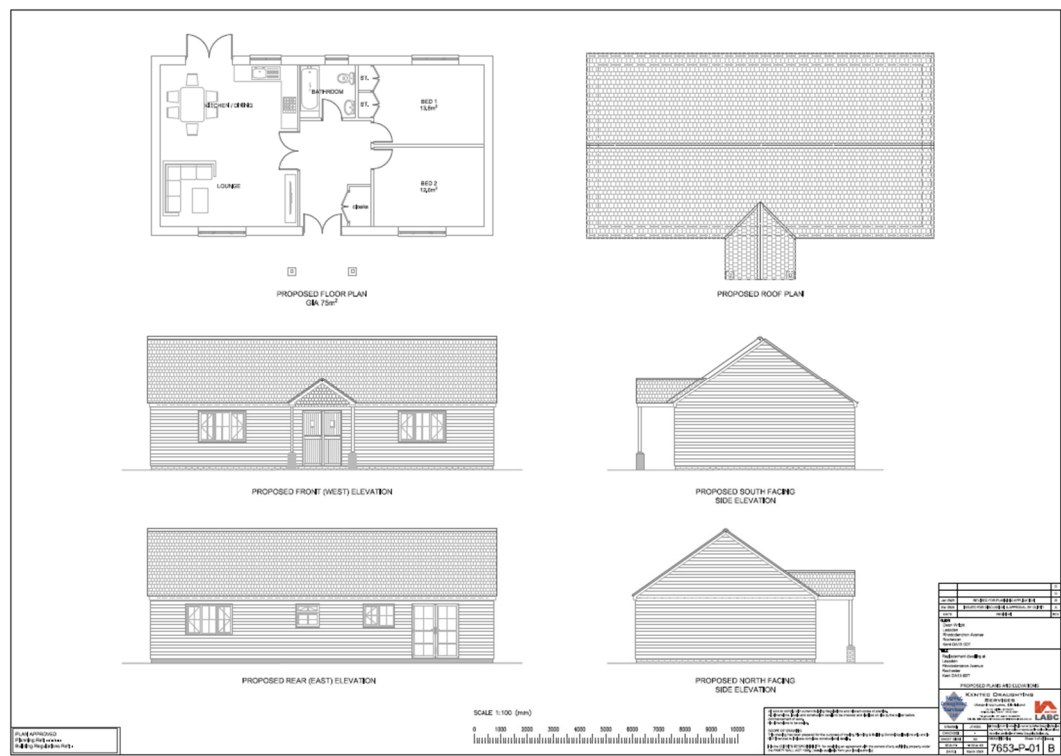


Steps leading to the existing building still in existence



A picture showing the full extent of the existing building before unsafe parts were removed.

The proposal involves the demolition of the existing building and the erection of a modest, 2-bedroom bungalow with a GIA of 75 square metres. The bungalow would feature timber cladded walls and a pitched roof covered with a traditional plain tile, designed to be visually in keeping with the rural surroundings. In addition, the development includes an access path and a parking area for two cars.



Proposed plans and elevations

3. Planning History

Reference	Description	Decision	Decision Date
19570271	The erection of a chalet for week-end and holiday use (Alternative reference TH/6/57/271)	Refused	29.01.1958
19550156	Erection of a chalet for weekend and holiday use (Alternative reference TH/6/55/136)	Refused	05.08.1955

The building is lawful through the passage of time, the building appears to be constructed in the 1960s aerial photo above.

Pre-application advice was sought from the Council regarding the current proposal (Appendix A-PRE20240096). The planning officer concluded that there were positive features of the proposal such as the appropriate design, there being no detriment to the residential amenity and no issues regarding highway safety.

Their main concern was whether the proposal would be inappropriate development within the green belt and cause harm to the openness of the surroundings and the site being an unsustainable location.

4. Green Belt Considerations

The site lies within the Green Belt, where the NPPF (December 2024) strictly controls new build development to preserve the openness of the land. However, the proposal seeks to replace an existing building with a new dwelling, and it is within the context of the NPPF's revised stance on Green Belt development that we make the case for this application.

Importantly, the recent changes in the NPPF have made provisions for the redevelopment of previously developed land and grey belt land in Green Belt locations more flexible, which we believe supports the suitability of this plot for a new dwelling. The development would not result in significant harm to the openness of the Green Belt, as it would replace an existing building with a modest, low-profile single storey structure.

-  Previously developed land (para 154(g))
-  Grey belt: does not strongly contribute to purposes (a), (b), or (d)
-  Minimal impact on openness
-  Meets sustainable location test (para 155)

The proposed development meets all three criteria outlined in paragraph 155 of the NPPF: it is on grey belt land, addresses unmet housing need, and is in a sustainable location.

4.1 Green Belt Development Policy Changes:

The NPPF has undergone significant amendments that affect how green belt land can be developed. Under the updated policy:

- **Comprehensive Review:** Local authorities are required to conduct a comprehensive review of their green belt boundaries to identify areas that might be suitable for development, provided they can demonstrate the need for this development and ensure minimal environmental impact.
- **Mitigation Measures:** Developers must implement strategies to minimise the impact on the green belt, such as ensuring the preservation of green corridors and maintaining key landscapes that contribute to the area's environmental integrity.

4.2 Introduction of "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.

That being:

- a) To check the unrestricted sprawl of large built up areas;
- b) To prevent neighbouring town merging into one another
- d) To preserve the the setting and special character of historic towns.

For the avoidance of doubt, Grey belt land includes land that does not strongly contribute in safeguarding the countryside from encroachment (Paragraph 143 (c)).

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 (Footnote 55- Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.)

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 sets out that 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; Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.
- 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.

Paragraph 155 goes further and confirms that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- 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 (Footnote 56- Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years;)

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

Grey Belt

There has been further clarification on the interpretation of Grey Belt policy issued within National Guidance.

In order for the principle of development to be accepted, the site would either need to meet one of the exceptions set out within paragraph 154 of the NPPF or paragraph 155-157 of the NPPF (Grey Belt).

Grey Belt is defined within the NPPF as- *“land in the green belt comprising previously developed land and/or any other land which, in either case, does not strongly contribute to any of purposes (a) (b) or (d) within paragraph 143 of the NPPF relating to the purposes of the Green Belt. ‘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 sets out the following assets;

- *Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest;*
- *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 existing site would not in our view strongly contribute to any of purposes (a) (b) or (d) within paragraph 143 of the NPPF, namely;

- Purpose A – to check the unrestricted sprawl of large built up areas
- Purpose B - to prevent neighbouring towns merging into one another
- Purpose D – to preserve the setting and special character of historic towns.

Therefore it is submitted the site constitutes Grey Belt land. In accordance with paragraph 155 of the NPPF;

National Guidance states that authorities should consider the extent to which the development of Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way. It is submitted that there is sufficient other Green Belt land across Bromley which would continue to meet the five identified purposes such that development of this site would not fundamentally undermine the purposes of the Green Belt across Bromley.

There is a demonstrable unmet need for the type of development proposed- Gravesham cannot currently demonstrate a five-year supply of deliverable housing sites, including the relevant buffer where applicable.

The site would be located in a sustainable location taking account of the requirements of paragraph 110 of the NPPF which states that development proposals should identify and pursue opportunities to promote walking, cycling and public transport use. However, it is recognised opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

The site can provide adequate on-site secure cycle storage, the site can also access the main village amenities on foot via Heron hill Lane, or by heading south on Rhododendron Avenue and connecting to the pedestrian route via Carters Hill and Willow Walk. There are public bus stops at the top of Heron Hill Lane, with the main A227, providing bus connections to Gravesend, Meopham Station and Sevenoaks via red route busses.

The site constitutes 'Grey Belt' land and the proposed residential development complies with the requirements of paragraph 155 of the NPPF. The principle of housing development therefore constitutes appropriate development.

Previously Developed Land

The proposal constitutes complete redevelopment of previously developed land. That being land occupied by a permanent structure, including the curtilage of the developed land. In accordance with paragraph 154(g) the demolition of the existing building (36sqm) being replaced with a single storey building of 75sqm, would clearly not cause substantial harm to the openness of the Green Belt. The fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open.

Whilst "substantial harm" is not defined within the NPPF, it is clearly a more generous interpretation than other thresholds, such as "materially larger" or "not disproportionate additions"

The property will remain single storey, largely sit on the existing and historic footprint of the building on site. Access would be provided with a simple footpath and two discreet parking spaces. New planting can be secured to the front and rear garden areas and the adjacent land, within the applicants ownership. All of which would ensure that within the context of the nearby linear housing along Rhododendron Avenue, the proposed dwelling would not cause substantial harm to the openness of the Green Belt in this location. Certainly there would be no significant sprawl of development and the historic openness of the site would remain. The proposal would accord with the exception outlined at paragraph 154 (g) of the NPPF.

5. Housing Supply Considerations

Gravesham Borough Council is currently under its 5-year housing supply target, which significantly impacts its ability to meet housing needs. As outlined in the NPPF, local authorities should promote the delivery of sustainable housing, particularly in areas with identified housing shortfalls. The provision of additional dwellings, such as this proposed self-build bungalow, contributes positively to addressing the housing shortfall in the borough.

Gravesham Borough Council has faced difficulties in meeting its housing supply targets. According to the Gravesham Five Year Housing Land Supply Statement (2022-2027), the Council is currently experiencing a shortfall of 1,785 homes against its local housing need figure, which results in just a 2.90 years' supply of housing over the next five years. This shortfall is crucial because it means that Gravesham is unable to demonstrate a five-year supply of deliverable housing sites, which can impact planning decisions.

In addition, the latest Housing Delivery Test Result indicates that Gravesham are currently only completing 59% of their housing requirement, demonstrating there is unmet need within the Borough.

This shortfall could result in planning applications being assessed with a presumption in favour of sustainable development, particularly for sites that would address the immediate housing needs of the borough. In accordance with Paragraph 155 the development of homes in the Green Belt should also not be regarded as inappropriate where:

- 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 development would be contained within the existing boundaries of the plot and would not result in the unrestricted sprawl of large built-up areas, the merging of towns, nor affect the setting and special character of historic towns. It is therefore logical to conclude that it does not “strongly contribute” to the green belt purposes and would meet the definition of grey belt land.

The re-development of the site would not fundamentally undermine the purposes of the Green Belt as a whole, across the Local Plan Area.

- b. There is a demonstrable unmet need for the type of development proposed

As already referenced, Gravesham cannot currently demonstrate a 5 year supply of housing, in addition they have fallen below the 75% threshold on the housing delivery test. As such there is a demonstrable unmet need for housing development in the area.

- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.

Rhododendron Avenue has contained dwellings for at least 50 years. It currently has over 100 properties on it including many houses and bungalows.

Proximity to services: Meopham is a semi-rural village with essential amenities such as shops, schools, healthcare facilities, and community services. The site lies within 420m of the A227, accessed via Herron Hill Lane. The A227 is the main tributary route connecting the larger villages of Meopham and Culverstone Green and Gravesend. This is a primary bus route and the centre of Culverston Green and all its village amenities lies 450m south of the junction of with Herron Hill Lane.

Transport links: The application site is just an 8-minute walk to the nearest bus stop (Ridley Turning on A227) which connects with Meopham railway station. This station provides commuter links to London and other towns. Public bus services further connect the area to nearby villages and Gravesend.

Sustainable travel options: Walking and cycling routes in the area support non-car-based travel, contributing to reduced carbon emissions. The main road through Meopham (A227, Wrotham Road/South Street) can be accessed in 8 minutes on foot. The local shop can be reached in under 20 minutes on foot.

Promoting sustainable development: The NPPF encourages new dwellings to be located where they can support local services and reduce the need for car-based travel. Rhododendron Avenue meets this criterion due to its accessibility to Meopham's amenities and public transport.

Efficient use of land: Developing new dwellings in existing residential areas promotes the efficient use of previously developed land, which aligns with the NPPF's directive to avoid unnecessary greenfield development.

Policy CS02 - Location of Development: This policy promotes development within identified settlements. Meopham is considered a rural service centre, where limited and sensitive development is encouraged to support local communities.

Policy CS11 - Transport: The policy emphasises sustainable transport options. Rhododendron Avenue's proximity to the railway station and bus routes aligns with this requirement. In planning policy terms, a new dwelling on Rhododendron Avenue would be sustainable due to its proximity to amenities, good transport links, alignment with local development policies, and the ability to use existing infrastructure efficiently. Ensuring compliance with design and environmental policies would further enhance the sustainability of any proposed development.

Accordingly, it is considered the development would be within a sustainable location, taking account of paragraph 110 and 115 of the NPPF which recognises the opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

The proposals would constitute the development of homes utilising grey belt land and accord with the objectives of paragraph 155 of the NPPF. Whether exception 154(g) or 155 is considered, the proposals would constitute appropriate development in the Green Belt.

6. Landscape and Character Considerations

The site is located within the Harvel Wooded Downs Landscape Character Area (LCA), which has been described in the Gravesham Landscape Character Assessment. While the proposal involves the introduction of built form into what was previously a heavily vegetated site, the impact of the development on the landscape is mitigated by the modest design of the dwelling and its integration into the surrounding environment.

The proposal's design, including traditional materials, is intended to blend harmoniously with the rural setting. Furthermore, the proposed development would have minimal impact on views both within and out of the character area, and the introduction of landscaping would enhance the biodiversity of the site. This approach is in line with the goals of Policy CS12 of the Gravesham Local Plan Core Strategy, which seeks to conserve and enhance the Borough's landscape character.

7. Other Policy Considerations

7.1 Local plan policies:

CS01 – Sustainable Development

The proposal promotes sustainable development by optimising the use of previously developed land in a manner sensitive to its woodland context. The modest enlargement of the structure ensures resource-efficient design, minimal land use, and environmental integration.

CS02 – Scale and Distribution of Development

The proposal represents a proportionate development within an established rural settlement. It respects the spatial characteristics of the area by maintaining a similar building footprint and ensuring no encroachment that would disrupt the existing character.

CS11 – Transport

The development provides practical on-site parking for two vehicles, minimising any impact on Rhododendron Avenue. The proposed loose stone path and compact access arrangements are sympathetic to the rural nature of the site.

CS12 – Green Infrastructure

The proposal includes reinstating the natural woodland surroundings, ensuring minimal disruption to existing flora and fauna. Further contributions can be made to biodiversity enhancement which will help integrate the structure seamlessly into the woodland environment.

CS14 – Housing Type and Size

The development provides a modest and practical starter home, addressing the need for diverse housing types within the borough. The efficient use of space ensures that the dwelling meets modern living requirements without compromising the rural setting.

CS15 – Housing Density

Given the woodland context and the green belt designation, the proposal maintains an appropriate density in keeping with the character of the area. The development respects the dispersed pattern of existing homes.

CS18 – Climate Change

The design incorporates energy-efficient features, including insulated floors, walls and roof. Renewable energy will also be introduced. These elements contribute to reduced carbon emissions and increased thermal efficiency.

CS19 – Design and Development Principles

The bungalow's design ensures visual attractiveness and local distinctiveness. The use of timber cladding and sympathetic roof materials aligns the development with its woodland setting. The setback location in the plot preserves the area's openness and minimises the building's visual impact.

CS20 – Heritage and the Historic Environment

The proposal respects the historic development pattern of the Culverstone Valley Area. By maintaining a style reminiscent of the original cabin, the development upholds the area's historical character while introducing necessary modern improvements.

7.2 NPPF policies:**Section 2 – Achieving Sustainable Development**

The proposal adheres to the principles of sustainable development by optimizing the use of previously developed land, promoting environmental sensitivity through the use of sustainable materials, and providing an efficient and modest housing solution.

Section 5 – Delivering a Sufficient Supply of Homes

By providing a small starter home, the development contributes to the local housing supply and aligns with national objectives to deliver a range of housing types to meet local needs.

Section 11 – Making Effective Use of Land

The proposal makes effective use of previously developed land without expanding the footprint disproportionately. The modest scale and careful siting ensure that land resources are utilised efficiently and responsibly.

Section 12 – Achieving Well-Designed Places

The development incorporates high-quality design features that respect the rural woodland setting. The use of natural materials, thoughtful massing, and visual harmony ensure a well-designed and locally appropriate development.

Section 13 – Protecting Green Belt Land

The proposal maintains the openness of the green belt by keeping the scale and mass similar to the existing structure and locating the development in a screened and setback position. No harm to the green belt's character or openness is anticipated.

Section 15 – Conserving and Enhancing the Natural Environment

The design preserves existing woodland features, will enhance biodiversity and ensures minimal environmental disruption. The development aligns with national goals for conserving and enhancing natural habitats.

Section 16 – Conserving and Enhancing the Historic Environment

The proposal respects the historic character of the Culverstone Valley Area by maintaining a design reminiscent of the original cabin while introducing necessary modern amenities. The development ensures that the area's historic context is conserved and complemented.

8. Very Special Circumstances

In accordance with the NPPF, inappropriate development within the Green Belt can be approved if there are very special circumstances that outweigh the harm caused. We believe that the very special circumstances in this case include:

- **NPPF Changes:** The recent changes to the NPPF provide greater flexibility for the redevelopment of previously developed land within the Green Belt, allowing for more sympathetic and contextually appropriate developments like the proposed bungalow.
- **Housing Need:** Gravesham Borough Council's current housing shortfall creates a pressing need for new housing, and the provision of this modest self-build bungalow contributes towards meeting that need in a sustainable and responsible way.
- **Site History and Impact:** The proposed development would replace a dilapidated structure that has been abandoned for decades, leading to limited visual or spatial detriment to the Green Belt, and would not be significantly more intrusive than the previous built form.

9. Conclusion

This application seeks permission for the construction of a modest 2-bedroom bungalow on previously developed land at Leasden, Rhododendron Avenue, Meopham. The proposal directly responds to national and local planning objectives by promoting sustainable, small-scale development that respects both the rural character and policy constraints of the area.

The site qualifies as “grey belt” land under paragraph 155 of the NPPF, meaning that development here is not inappropriate when it meets specific criteria — all of which are satisfied in this case. The proposal replaces a long-standing, dilapidated structure with a sensitively designed dwelling that sits within the original curtilage, preserves openness, and integrates well with the surrounding landscape character.

Very special circumstances are demonstrated through:

- The complete redevelopment of previously developed land, aligning with paragraph 154(g) of the NPPF.
- A pressing housing shortfall within Gravesham, with just a 2.9-year supply and poor performance on the Housing Delivery Test.
- A sustainable location with access to village amenities and public transport links.
- A design that supports environmental goals through energy efficiency and biodiversity enhancement.

The development complies with relevant policies in both the Gravesham Local Plan and the NPPF, and no significant harm — to the Green Belt or other protected assets — has been identified. The balance of considerations clearly weighs in favour of granting planning permission.

Accordingly, the proposal benefits from the presumption in favour of sustainable development, and planning permission should be granted without delay in line with paragraph 11 of the NPPF.