



Gravesham Borough Council
Planning Department

28 February 2025

Dear Sir/Madam

Objection Letter – Planning Reference: 20250110

Proposal – Change of use of the land for the stationing of 2 static homes, 2 touring caravans and shared day room for Gypsy / Traveller occupation. Associated hard and soft landscaping.

Site – Land South Of Pear Tree Lane, Pear Tree Lane, Shorne, Gravesend, Kent

 has again been instructed by  the owner occupier of 
 to review and draft a formal response to the above planning application that has been lodged with the Council.

Following a review of the latest submitted plans and the supporting documents with my clients, they have serious concerns with the latest application proposed and therefore continue to strongly **OBJECT** to the application for reasons that will be detailed below.

It is concerning that the Council has again validated this latest application given the previous refusals at the site. The proposal will blight my clients' adjacent properties.

At the outset it is important to note that there are four directly neighbouring properties adjacent to this parcel of land, all of which will be directly impacted by the development. Additionally,



there are eight bungalows situated directly opposite the site, whose residents will also experience significant disruption.

It is unprecedented for a travellers' site to be placed immediately adjacent to existing residential properties in this manner anywhere in the UK. Should the Council fail to take appropriate action, this could establish a harmful precedent, paving the way for similar sites to be placed arbitrarily on small parcels of land without proper consideration for the impact on local communities. My clients are deeply concerned that inaction on this matter will lead to further inappropriate and unsustainable developments in unsuitable locations.

1.0 BACKGROUND

The applicant, [REDACTED] lodged this latest planning application (planning reference: 20250110) with the Council on 10th February 2025. It is requested that the application is reported to Planning Committee and my client respectfully requests that once the committee report has been published that further representations can be made. It is notable that as illustrated engineering work has commenced on site without the benefit of planning permission and that it is expedient and in the wider public interest for immediate enforcement action to be undertaken against this breach of planning control.

Current View of Site





2.0 PLANNING HISTORY

There is an extensive planning history at this site. As touched upon above, my clients have strongly objected to the previous application at the site under planning reference: 20240600 in a letter dated 4th December 2024 for the change of use of the land for the stationing of 2 static homes, 2 touring caravans and shared day room for Gypsy / Traveller occupation. Associated hard and soft landscaping.. This application was refused on 17th January 2025 for the following reasons:

- 1. The proposed development involves the use of a non-mains foul drainage system in circumstances where it may be reasonable for the development to be connected to a public sewer, no justification has been provided for the use of a non-mains system. Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems. The proposal is contrary to paragraphs 187 (e) and 198 of the National Planning Policy Framework (2024) and Policy CS19 of the Gravesham Local Plan Core Strategy 2014.*
- 2. The proposal fails to secure a contribution towards strategic mitigation measures within the Thames Estuary and Marshes SPA/Ramsar Sites to resolve disturbance issues to wintering birds, and in the absence of this contribution or any evidence to inform an appropriate assessment, the development fails to comply with the requirements of the Habitat Regulations and paragraphs 193 and 194 of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.*

Prior to this refusal, planning application under planning reference: 20200339 for erection of two dwellings was refused by the Council on 29th May 2020 for the following reasons:



1. *The site is within the Metropolitan Green Belt. Within the Green Belt there is a strong presumption against permitting new development outside of the present defined extent of urban areas and the present extent of any village. National Planning Policy Framework Section 9 (Protecting Green Belt Land) indicates that the most important attribute of Green Belts is their openness. The development will not preserve the openness of the Green Belt through construction of 2 dwellings associated hardstanding, lighting, car parking and residential paraphernalia and will conflict with the purposes of including land within the Green Belt as it will encroach into the countryside and urbanise the site. In the absence of any 'very special circumstances' that may otherwise outweigh the harm by reason of inappropriateness, and any other harm, the proposed development is considered to be contrary to the advice in National Planning Policy Framework (2019) Section 9 (Protecting Green Belt Land), and Policy CS02 (Scale and Distribution of Development) of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014).*
2. *The application site lies within the locally designated Shone Woodlands landscape area, where planning policy and guidance expect developments to conserve, restore and enhance the natural landscape. The proposed development, if permitted, would be harmful to the landscape character when compared to the existing site. The harm from the redevelopment of the site in this instance would be derived from the bulk and massing of the dwellings, the associated hardstanding, lighting, car parking and residential paraphernalia. The application is therefore contrary to Policies CS12 and CS19 of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014).
Gravesham Borough Council*
3. *The site lies in the designated countryside outside the confines of the urban areas and rural settlements. The proposal comprises of residential development in the countryside, being within an unsustainable location and contrary to Policies CS01 and CS02 of Gravesham Local Plan Core Strategy (September 2014) and paragraph 79 of the National Planning Policy Framework (2019).*



4. *The applicant has failed to provide any ecological evidence to inform a habitat regulations assessment to address the impact of the proposed development on the Thames Estuary and Marshes Ramsar site and Special Protection Area (SPA) or offered a financial contribution towards the identified mitigation measures to address the impact of the development on the SPA/Ramsar site. The proposal is therefore contrary to Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy (2014) which seeks to ensure that detrimental effects on the integrity of SPA/Ramsar sites are avoided, and also contrary to Paragraphs 175 and 176 of the National Planning Policy Framework (2019).*

A subsequent appeal (reference: APP/K2230/W/20/3258951) was dismissed on 4th March 2021. The Inspector found that *“the proposed development would be inappropriate development in the Green Belt, reducing its openness and compromising the objectives of the Framework in keeping Green Belt land permanently open. While the site would provide a suitable site for housing having regard to its proximity to services and facilities, the development would harm the landscape character of the area with particular regard to the Shorne Woodlands Landscape Area.”*

In light of this recent appeal decision, which carries significant weight it is contended that this latest application should also be refused for the same reasons.

3.0 SUMMARY GROUNDS OF OBJECTION

The following is a summary of my client's objection to this proposal:

- i) **Principle of development is unacceptable and comprises inappropriate development within this part of the Green Belt that will have a detrimental impact on openness;**
- ii) **The development will result in an adverse impact on the Shorne Woodlands Landscape Area;**



- iii) **The proposal will inflict severe harm on the residential amenity of neighbouring properties;**
- iv) **The development will have a detrimental impact on biodiversity interests at the site;**
- v) **Due to the position of the access off the highway network and the nature of this insensitive development, it will have an adverse impact on highway and pedestrian safety; and**
- vi) **Insufficient detail on foul and surface water strategy for the site.**

4.0 PLANNING POLICY CONTEXT

In December 2024, the Government published the latest version of the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and sets out how they are expected to be applied. The NPPF took immediate effect.

Paragraph 2 of the NPPF states that *"Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise."*

Paragraphs 7 and 8 confirm that the purpose of the planning system is to contribute to the achievement of sustainable development, which comprises economic, social and environmental dimensions.

The NPPF retains a presumption in favour of sustainable development. Paragraph 11 reaffirms that *"applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise."*

The Courts have held that Central Government's policy is a material consideration that must be taken into account by the decision maker, as are relevant appeal decisions. The



development plan consists of the Gravesham Local Plan Core Strategy (2014) and Gravesham Local Plan First Review Saved Policies (2014). A summary of the relevant planning policies is produced at Appendix A.

5.0 DETAILED GROUNDS OF OBJECTION

i) **Inappropriate development in the Green Belt that will impact upon openness**

My clients wish to reiterate that this proposal raises significant and unresolved concerns, directly conflicting with both local and national planning policy. In assessing the previous application, the Council failed to give sufficient weight to these matters, and my client remains firmly of the view that the proposal is wholly inappropriate.

Failure to Meet the Revised Definition of “Gypsies and Travellers”

The 2015 Planning Policy for Traveller Sites (PPTS) introduced a revised definition of “gypsies and travellers,” specifically excluding individuals who have ceased to travel permanently. The evidence submitted by the applicants does not demonstrate compliance with this definition:

- [REDACTED] is employed by a local business in Chatham and works in the Medway Towns, clearly indicating a settled lifestyle rather than a nomadic habit of life.
- Charmaine Smith, while identifying culturally as a Traveller, does not travel for work and remains permanently on-site to care for her children. This does not align with the PPTS requirement for a nomadic way of life.
- [REDACTED] has ceased travelling due to health reasons. The PPTS only allows for a temporary cessation of travelling, and there is no indication that she intends to resume a nomadic lifestyle.

The Council has previously failed to give sufficient weight to this issue and must now fully assess whether the applicants meet the necessary criteria. Based on the available evidence, they do not.



Harm to the Green Belt and the Lack of “Very Special Circumstances”

Paragraph 152 of the National Planning Policy Framework (NPPF) states that inappropriate development in the Green Belt is, by definition, harmful and should only be approved in very special circumstances. In this case:

- The proposal involves a material change of use, including land re-levelling, fencing, and the introduction of mobile homes, touring caravans, and a day room. These alterations will cause significant harm to the openness of the Green Belt and directly conflict with its purposes.
- While the applicant claims the harm would be “limited,” paragraph 153 of the NPPF is clear that substantial weight must be given to any harm to the Green Belt.

The applicants have failed to demonstrate very special circumstances that outweigh this harm. The presence of existing Traveller sites or residential properties in the area does not justify further encroachment into the Green Belt, particularly when no proper justification has been provided as to why alternative sites outside the Green Belt have been discounted. The Council’s previous assessment did not adequately consider these factors, and this must now be addressed.

Conflict with Local Planning Policy

The proposal is also fundamentally at odds with Policy CS02 of the Gravesham Local Plan Core Strategy, which directs new development to urban areas and rural settlements inset from the Green Belt. This policy seeks to prevent exactly this type of speculative development in unsustainable locations.

Furthermore, while the PPTS does not explicitly require proximity to public transport or local services, the remote location of the site raises serious sustainability concerns:

- The lack of access to essential services such as schools, healthcare, and local amenities



will increase reliance on private vehicles, contradicting the sustainability principles of both the PPTS and the NPPF.

- The introduction of permanent structures and associated infrastructure will detract from the rural landscape, creating a cumulative impact that has not been properly assessed.

The Council has previously failed to weigh these factors appropriately, particularly in terms of the cumulative impact of this and other Traveller sites in the area. The absence of a specific criteria-based policy for windfall Traveller sites does not exempt the proposal from meeting key material considerations, including its impact on the Green Belt, the local landscape, and neighbouring residential amenities.

This application fails to meet the PPTS definition for gypsies and travellers, constitutes inappropriate development within the Green Belt, and directly contradicts Policy CS02 of the Gravesham Local Plan Core Strategy. The applicant has not demonstrated very special circumstances that would outweigh the substantial harm to the Green Belt, as required by the NPPF.

Furthermore, there are clear sustainability and cumulative impact concerns that have not been properly addressed. The Council's previous assessment did not give sufficient weight to these issues, and my client urges the Council to take full account of the significant policy conflicts and environmental harm that would result should this application be approved.

The NPPF is explicit that substantial weight must be given to any harm to the Green Belt, and in this case, there are no exceptional circumstances to justify the proposal. It is inappropriate development that directly contradicts both local and national policy and should be refused accordingly.



ii) Adverse impact on the Shorne Woodlands Landscape Area

The proposed development would result in substantial harm to the landscape character of the area, a matter that was previously recognised by the Planning Inspector in the dismissed appeal for two dwellings at the site (Appeal Decision APP/K2230/W/20/3258951). In that decision, the Inspector placed significant emphasis on the findings of the Gravesham Landscape Character Assessment (LCA), which identifies the area as having:

- An enclosed character due to coppiced woodland and undulating landform, which reinforces the sense of openness and rural tranquillity.
- A distinct settlement pattern, with strong village centres such as Shorne Ridgeway, which contribute to a well-defined sense of place.

The Inspector's conclusions in the previous appeal were unequivocal:

- Diminution of the spacious landscape character: The development of the site would erode the defining characteristics of the area, which are marked by low-density development and expansive plots that contrast sharply with tighter-grained development found within settlements.
- Introduction of an urbanised pattern of development: The proposed use of the site would impose an incongruous, intensified land use, fundamentally at odds with the loose-grained, rural pattern of development that currently defines the area.
- Weakening of the area's strong sense of place: The Inspector found that the proposal would detract from the integrity of the Shorne Woodlands Landscape Area, contrary to the provisions of Core Strategy Policies CS12 and CS19, which require development to respect and enhance the Borough's landscape character.

Despite these clear and well-reasoned findings, the Council, in its assessment of the current



proposal, has once again failed to give sufficient weight to these matters. The introduction of a Traveller site, with its associated infrastructure—including mobile homes, touring caravans, fencing, hardstanding, and a day room would exacerbate the very harms previously identified by the Inspector. The urbanisation of the site through the introduction of man-made structures and associated paraphernalia would further erode the openness and distinctive rural character of this sensitive landscape, a matter that has not been adequately considered in the Council's assessment.

Conflict with the Spatial Strategy and Sustainability Concerns

Policy CS02 of the Gravesham Local Plan Core Strategy clearly sets out a spatial strategy that directs new development towards urban areas and rural settlements inset from the Green Belt, where it can be more sustainably accommodated. The current proposal fundamentally conflicts with this strategy for several reasons:

- **Unsustainable location:** The site's isolated and rural position raises serious concerns regarding accessibility, as it lacks proximity to essential services, schools, healthcare facilities, and public transport links.
- **Increased reliance on private vehicles:** The lack of sustainable transport options would necessitate a heavy reliance on private vehicles, directly contradicting the objectives of both the National Planning Policy Framework (NPPF) and the Planning Policy for Traveller Sites (PPTS), both of which place strong emphasis on promoting sustainable patterns of development.

Again, the Council has failed to acknowledge or appropriately weigh these considerations, despite their clear relevance in assessing the appropriateness of the site for development.

Failure to Assess Cumulative Impact and Precedent Risk

Furthermore, the cumulative impact of additional Traveller sites in this sensitive Green Belt



location has not been fully assessed. The failure to conduct a comprehensive cumulative impact assessment is a significant oversight, as it neglects the potential long-term implications of approving this proposal. The introduction of yet another Traveller site in this area would set a dangerous precedent, paving the way for further encroachments into the Green Belt and thereby accelerating the erosion of the area's rural and landscape character.

The previous Inspector's findings regarding the site's unsuitability for residential development remain directly relevant to the current proposal, yet the Council has failed to give them due weight in its assessment. The proposed development would introduce an urbanising and visually intrusive land use, fundamentally at odds with the spacious, rural character of the Shorne Woodlands Landscape Area, and in direct conflict with Core Strategy Policies CS12 and CS19. Additionally, the Council has once again failed to adequately consider:

- The importance of landscape character and the spatial pattern of development, as recognised by the previous Inspector.
- The fundamental conflict between the proposal and Policy CS02, which prioritises development in urban and inset rural locations.
- The sustainability concerns associated with the site's remoteness and the increased reliance on private vehicles.
- The cumulative impact of incremental development pressure in this sensitive location.

For these reasons, it is clear that the proposal cannot be justified in planning terms. The Council has not given sufficient weight to these key policy conflicts and material considerations, resulting in a flawed assessment that fails to protect the integrity of the Green Belt and the rural landscape.

iii) Neighbour amenity

The proposed development is situated in immediate proximity to a number of existing residential properties, yet the local planning authority has failed to acknowledge the full extent



of its impact. There are four directly adjoining properties that will be significantly affected by this proposal, in addition to eight bungalows located directly opposite the site. The failure to properly assess the implications for these residents demonstrates a lack of due consideration in the decision-making process.

Furthermore, there is no precedent within the United Kingdom for a Gypsy and Traveller site being established in such close proximity to existing residential dwellings. Should the local authority permit this development, it risks setting an undesirable precedent for similar encroachments on small parcels of land, potentially leading to an unsustainable pattern of site allocations without appropriate strategic planning.

One of the most pressing concerns is the detrimental impact on the residential amenity of neighbouring properties. The nature of the proposed development, which includes caravans, touring vans, and associated day rooms, is likely to result in a substantial loss of privacy for adjoining households. The layout and usage patterns associated with such sites typically involve an element of outdoor living, which inherently increases the potential for overlooking into neighbouring properties. This will compromise the level of privacy currently enjoyed by residents, creating an intrusive and uncomfortable living environment.

Additionally, the presence of multiple households within a confined site is expected to generate considerable noise pollution. The movement of vehicles, including large caravans and trailers, alongside the general day-to-day activities of site occupants, will result in a persistent increase in noise levels. The tranquil character of the area will be fundamentally altered, with local residents experiencing a significant deterioration in their quality of life due to the increase in activity, particularly during unsociable hours.

Another major concern is the potential for increased light pollution. If external security lighting is installed, the emissions from these sources—particularly during evening and night-time hours—will disrupt the current low levels of artificial illumination in the area. The introduction of such lighting will not only affect the visual amenity of nearby properties but will also disturb



wildlife and the overall ecological balance of the locality. Despite any proposed boundary treatments, these measures are unlikely to fully mitigate either the acoustic or visual impact of the site, leaving the surrounding community exposed to an ongoing loss of amenity.

From a policy perspective, the proposal is demonstrably at odds with the National Planning Policy Framework (NPPF), particularly paragraph 135(f), which stipulates that all developments must provide a high standard of amenity for both existing and future users. In this instance, the proposed site will result in a substantial and negative impact on the amenity of neighbouring residents due to its close proximity, scale, and the nature of the associated activities. Moreover, the proposal contravenes Core Strategy Policy CS19, which explicitly requires developments to safeguard residential amenity by preserving privacy, access to daylight, and the peaceful enjoyment of homes.

The cumulative impact of this development in what is predominantly a residential area will lead to an unacceptable intensification of use, fundamentally altering the established character of the locality. The conversion of what was previously an open area into a high-occupancy site will introduce significant and adverse changes, undermining the existing sense of place and causing distress to local residents.

Overall, the proposed Gypsy and Traveller site is wholly inappropriate for this location due to its proximity to existing homes, the substantial loss of residential amenity, and the anticipated adverse effects relating to noise, privacy, light pollution, and the erosion of the area's rural and tranquil character. The proposal conflicts with both national and local planning policies and, if approved, would set a damaging precedent for further unplanned and inappropriate site allocations. It is therefore imperative that the local planning authority refuses this application to protect the well-being of existing residents and maintain the integrity of the local area.



iv) Highway and Pedestrian Safety

While it is acknowledged that the site has an existing access point, the proposed change of use and the associated increase in vehicular movements represent a material intensification of the use of this access. The proposal will result in a notable rise in slow-moving traffic entering and exiting the site. This is particularly concerning given the characteristics of the surrounding road network, which is likely to see delays, congestion, and increased risks of accidents arising from the movement of large vehicles.

The slow moving nature of vehicles, especially during entry and exit from the site, poses significant safety risks for other road users. This is especially relevant during peak traffic hours when the likelihood of collisions or near-misses increases. Such risks are compounded if the existing access does not fully meet modern standards for accommodating larger vehicles or if the visibility splays, while deemed adequate, do not account for the slower acceleration of towing vehicles or the additional stopping distances required for other road users.

Moreover, the intensification of use is inconsistent with the rural character of the area. The daily movements of residents, combined with visitors, deliveries, and maintenance vehicles, will result in a significant increase in traffic that is out of character with the surrounding area and will impact on the experience of road users and pedestrians.

Of further concern is the complete lack of a Transport Statement or Transport Assessment to support the application. The absence of this essential document undermines the ability of the Council and stakeholders to fully understand and assess the traffic and transport implications of the proposal. National and local planning policies clearly require that developments likely to generate significant transport impacts must be accompanied by evidence demonstrating that the site is accessible, safe, and capable of accommodating the proposed use without adverse effects on the highway network. The lack of a Transport Statement means that critical issues such as traffic generation, vehicle turning radii, entry and exit manoeuvres, and potential mitigation measures have not been adequately addressed.



Additionally, the cumulative impact of increased traffic, particularly from slow moving vehicles, will contribute to congestion on the surrounding road network and increase risks to vulnerable road users such as pedestrians and cyclists. Without a comprehensive assessment, it is impossible to determine whether the proposed access arrangements are appropriate for the proposed scale of development or if they can safely accommodate the increased use.

Overall, the assertion that the site's existing access is adequate and that there will be no significant intensification of use is not supported by evidence and cannot be accepted. The proposed development will introduce slow moving traffic and significantly intensify the use of the access, leading to potential harm to other road users and degrading the safety and efficiency of the local highway network. The absence of a Transport Statement further highlights the deficiencies of the proposal and raises serious concerns about its compatibility with both local and national transport policies.

v) Biodiversity

There is a concerning lack of ecological information provided as part of this application. The proposed development is located in an area where the natural environment, including habitats for protected and priority species, may be affected. Without a detailed ecological assessment, there is no evidence to confirm whether the proposal would preserve or harm local biodiversity. The National Planning Policy Framework (NPPF) identifies the need to conserve and enhance the natural environment and mandates that adequate information is provided to assess potential impacts on wildlife and habitats. The absence of such information not only undermines the Council's ability to make an informed decision but also fails to comply with the requirements of the NPPF and local policies aimed at enhancing the local environment.

vi) Drainage

Given the scale of the proposal and its potential environmental implications, it is deeply



concerning that no comprehensive drainage assessment has been provided. Effective wastewater and surface water management is essential to prevent pollution, mitigate flood risk, and protect local watercourses.

The introduction of caravans and associated facilities will generate substantial volumes of wastewater. In the absence of a clearly defined disposal strategy, there is a significant risk of environmental harm, including contamination of land and watercourses. This issue is particularly pressing in areas where soil permeability and hydrological conditions are sensitive to alterations. Without robust foul drainage infrastructure, the proposal fails to demonstrate that it will not result in unacceptable environmental consequences.

Equally, the lack of a surface water management plan is a critical omission. The proposed works, including the introduction of hardstanding and site re-levelling, will likely increase impermeable surface coverage, exacerbating surface water runoff. Without suitable attenuation measures, such as Sustainable Drainage Systems (SuDS) or other appropriate mitigation, the development poses a considerable risk of surface water flooding, both within the site and in downstream areas, potentially affecting neighbouring properties and local infrastructure.

The absence of this fundamental information precludes any meaningful assessment of the proposal's compliance with national and local planning policies on water management and environmental protection. Until a comprehensive and robust drainage strategy is submitted demonstrating that foul and surface water will be managed without adverse environmental effects, the application remains incomplete and should be deemed unacceptable.

5.0 SUMMARY

For the reasons set out above, this proposal represents an unacceptable form of development that directly conflicts with both national and local planning policy. The applicant has failed to demonstrate compliance with the revised Planning Policy for Traveller Sites



(PPTS) definition, rendering the justification for the development fundamentally flawed. Furthermore, the proposal constitutes inappropriate development within the Green Belt, which, by definition, is harmful and should only be permitted in very special circumstances—none of which have been adequately demonstrated in this case.

The harm to the openness and character of the Green Belt, coupled with the adverse impact on the Shorne Woodlands Landscape Area, is significant and has not been appropriately addressed by the Council. The findings of the previous Planning Inspectorate decision are highly relevant and reinforce the conclusion that this site is wholly unsuitable for the proposed development. The urbanising effect of the scheme, the encroachment into a protected rural landscape, and the cumulative impact of further development in this sensitive area all point to an unacceptable departure from the established spatial strategy of the Gravesham Local Plan Core Strategy.

Moreover, the proposed development would result in demonstrable harm to the amenity of neighbouring properties, an issue that has been insufficiently assessed in the Council's determination. The proximity of the site to existing dwellings raises significant concerns regarding loss of privacy, noise disturbance, and visual intrusion, exacerbating the unplanned and unsustainable nature of the scheme.

Given these material planning conflicts, it is clear that this application fails to meet the necessary policy tests and should be refused. The National Planning Policy Framework (NPPF) is unequivocal in stating that substantial weight must be given to any harm to the Green Belt, and in this instance, the level of harm far outweighs any claimed justification. Approving the development would set a dangerous precedent for further encroachment into protected landscapes and undermine the strategic objectives of both national and local planning policy.



Accordingly, my clients urge the Council to give full weight to these objections and to refuse planning permission for the proposed development.

Yours faithfully

[Redacted signature block]



Appendix A – Relevant Planning Policies

The following policies are pertinent to this objection:

Gravesham Local Plan Core Strategy – 2014

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS17 – Provision of Traveller Sites
- Policy CS19 – Development and Design Principles

Gravesham Local Plan First Review Saved Policies – 2014

- Policy P3 - Vehicle parking standards