



PLANNING STATEMENT

Land Adj. 4 Chalk Pit Cottages

Green Farm Lane

Shorne

Gravesend

Kent

DA12 3HN

November 2023

1.0 INTRODUCTION

This Planning Statement has been prepared by Kent Planning Consultancy on behalf of Mr Suki Randhawa to Gravesham Borough Council, as local planning authority, for the development potential of a site located at:

Land Adj. 4 Chalk Pit Cottages, Green Farm Lane, Shorne, Gravesend, DA12 3HN

(hereinafter referred to as the 'Site')

The development proposal description is:

'Erection of a new dwellinghouse'

This report:-

- sets out the site context and surroundings
- reviews the site history
- establishes the planning constraints
- sets out the planning considerations, and;
- reviews the compliance of the proposal with local and national planning policy and guidance

The site is located within Gravesham Borough Council's jurisdiction as local planning authority, is within the Shorne Parish Council area, and Kent County Council acts as the local Highways authority.

This submission follows pre-application engagement with Gravesham Borough Council. Gravesham provides a detailed pre-application response, which suggested that the Council would not support an application on the grounds that the proposal did not represent 'Infill'. This application has been submitted as we believe that the proposal meets the objectives of the 'infill' exception within the NPPF, and as such does not represent 'inappropriate' development in the Green Belt.

The subsequently submitted proposal under ref. 20230438 was refused by the Council on four grounds which can be summarised as concerned Green Belt, local landscape, ecology, and SPA mitigation. These are addressed within this submission.

Alongside the other benefits of the proposal, including biodiversity net gain, the tidying up on an otherwise dilapidated and low quality brownfield site, and amendments to the proposed design and parking provision to reflect pre-application comments, the proposal should be considered in accordance with the policies of the local development plan, and national planning policy and guidance, and approved.

2.0. SITE LOCATION AND DESCRIPTION

The site is located in a rural area to the east of Gravesend and to the north of Shorne.

The immediate area around the site contains a hand-full of dwellings to the north and south of the site, otherwise surrounded by open fields. East and west of the site is characterised by cropped based fields.

The site forms a gap in between a row of existing dwellings on Green Farm Lane, which is formed of approximately 10 dwellings on the western side of the road.

The site itself is a largely overgrown scrubland with some trees, with an existing access from Green Farm Lane.

3.0 PLANNING HISTORY

This submission follows pre-application engagement with Gravesham Borough Council. Gravesham provides a detailed pre-application response, which suggested that the Council would not support an application on the grounds that the proposal did not represent 'Infill'. This application has been submitted as we believe that the proposal meets the objectives of the 'infill' exception within the NPPF, and as such does not represent 'inappropriate' development in the Green Belt.

The subsequently submitted proposal under ref. 20230438 was refused by the Council on four grounds, which read:

1. The site is within the approved 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 2021 Section 13 (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 1 additional dwelling, 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 Section 13 (Protecting Green Belt Land) of the National Planning Policy Framework (NPPF) 2021, 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 Higham Arable Farmlands Landscape Character Area, where local and national 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 dwelling, the associated hardstanding, lighting, car parking and residential paraphernalia. The application is therefore contrary to Policy CS12 and CS19 of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014) and Section 15 of the National Planning Policy Framework (NPPF) 2021.

3. The applicant has failed to provide any ecological evidence assessment covering the impact of the development on wildlife including reptiles. Together with the significant loss of mature landscaping and scrub land, the proposal would result in a biodiversity net loss, contrary to Policy CS12 of the Gravesham Local Plan Core Strategy (September 2014) and paragraphs 180 and 181 of the National Planning Policy Framework (NPPF) 2021.
4. The proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development fails to comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 180 and 181) of the National Planning Policy Framework 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

These are addressed within this submission.

A review of the records available at Gravesham Borough Council's website has not identified any other relevant planning history for this site.

A review of aerial photography available on Google Earth(™) does not appear to identify any previous development on the site.

It would appear that some activities have taken place on the site, including potentially the erection of a small shack, which is no longer prevalent, and other activities which may have included vehicles movements.

4.0 PROPOSED DEVELOPMENT

Kent Planning Consultancy submits this application to Gravesham Borough Council with a proposal description of:

'Erection of a new dwellinghouse'

The proposal includes the erection of a two storey dwelling within the southern portion of the site, so as to represent an extension to the cluster of development to the south of the site, and to represent a broader infill of the gap between the two clusters of development that form of the hamlet of which the site forms part.

The proposed dwelling would continue the existing building line in the immediate area, and reflect the general design pattern of the street.

The area to the front of the property would be the parking area and front garden, with the remainder of the site becoming a residential garden area and biodiversity enhancement areas.

The proposed dwelling would use materials familiar to the hamlet, including tile, render, and exposed brick.

5.0 THE DEVELOPMENT PLAN & RELEVANT PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with these policies should be allowed unless material considerations indicate otherwise.

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are material considerations.

The Development Plan comprises the following relevant documents:

- Gravesham Local Plan Core Strategy
- Gravesham Local Plan first review

National - NPPF (July 2021)

The NPPF sets out the Government's planning policies for England and puts "*the presumption in favour of sustainable development*" at the heart of the planning system. The following chapters are relevant to the proposal:

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision Making
- Chapter 5 - Delivering a sufficient supply of homes
- Chapter 11 - Making effective use of land.
- Chapter 12 – Achieving well-designed places
- Chapter 13 - Protecting Green Belt land
- Chapter 15 – Conserving and Enhancing the Natural Environment

Local - Local Plan Core Strategy

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

Local - Local plan First Review 1994

- T1 - Impact of Development on the Highway Network
- P3 - Vehicle Parking Standards

Other Documents - Kent Design Guide (2005)

The Kent Design Guide seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas

6.0 PLANNING REVIEW

Key Planning Constraints

In reviewing the local plan and other sources, the following constraints have been identified:

- The site is located within the defined boundaries of the Metropolitan Green Belt

Principle of Development

The site is within the designated Metropolitan Green Belt, where policies of significant constraint apply, and development is generally not permitted where no exceptional or 'very special circumstances' exist.

The National Planning Policy Framework reads that the Green Belt has the following five established purposes

'138. Green Belt serves five purposes:

- 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.'*

The proposal does not appear to conflict with any of the above. Whilst no established 'brownfield' use has been identified on the site, or within its history, the site clearly represents an area of unused scrub land in a clearly substantially degraded state, including areas of what appear to be remains of a building, rubble, and other imported materials.

The proposal would not represent, or form part of a wider representation, of urban sprawl (a), would not assist in the merging of two towns, given the proposals scale and citing within an existing hamlet, and forming part of a small linear development (b), does not encroach on an area of land which can be considered 'countryside' or contributing to a wider 'countryside' character (c), does not impact any area of historic landscape (d), but would represent the re-use of an area of land which clearly represents a derelict scrub, whether or not any actual use can be identified (e).

The NPPF further reads:

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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.

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

(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) 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, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

Given the above, the development of green field land within the Green Belt for residential purposes is generally considered 'inappropriate'. However, Kent Planning Consultancy are of

the view that the proposed development would meet the requirements of ‘limiting infilling in villages’, given that the proposal would represent a local infill between properties which form an established building line within the landscape.

The erection of a dwelling in this location would not have a material impact on the openness of the Green Belt. The proposal is not in direct conflict with any of the five purposes of the Green Belt.

Of the Gravesham Local Plan, CS02 reads:

4.2.27 In the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan.

As previously identified, the site is located within the defined Green Belt. Given this, it is taken that the policies of Gravesham Borough Council follow that of the NPPF in their presumption against development within the Green Belt.

The site subject to this review is not within a defined village or settlement boundary, nor does it closely bound one. However, the site is bound to the north and south by existing development, and forms part of a clearly defined row of housing along the eastern side of Green Farm Lane. The generally accepted definition of infilling is the infilling of a small gap in an otherwise built up frontage; the site clearly meets such a definition.

As set out above in para 149(e) of the NPPF, limited infilling in villages will be considered an exception to the general presumption against development, and thus we believe that the proposal represents a compliant scheme .

However, there are visual impact implications on this site, given its exposure to the landscape to the east and west. Consideration has been given to the sites opportunity to include two dwellings. However, Kent Planning Consultancy have taken the view that setting the building to the southern portion of the site, and continuing to allow views through the site, would aid in ensuring any visual impact is extraordinarily limited, and the broader sense of openness within the countryside and Green Belt is maintained.

In all, it is the view of Kent Planning Consultancy that the proposal represents appropriate development in the Green Belt, as it does not conflict with the five purposes of the Green Belt, and represents limited infilling in accordance with the NPPF.

Other Considerations

Design

At a national level good design is one of the central requirements of the NPPF:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. (Paragraph 126)

The aims set out in paragraph 126 of the NPPF are reflected in Policy CS19 of the Council's Core Strategy.

This requires new development to be "visually attractive, fit for purpose and locally distinctive" and to "conserve and enhance the character of the local built, historic and natural environment". It also requires new development to "integrate well with the surrounding local area". In addition, Policy CS19 requires the following:

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

Following the pre-application response, the design of the proposed building has been amended to take a simpler form, with a more appropriate, simple two storey design, with an 'extension element incorporating the garage and accommodation above, reflecting the design found on the existing property to the south, as opposed to the dropped eaves and cat-slide within the original design.

Given the neighbouring properties, both within the immediate vicinity and wider context, the proposal is considered an appropriate response to the prevailing vernacular.

Landscape and Character Impact

The wider area around the site forms a relatively open landscape area, although it is not considered to be of 'special landscape value' (as outlined within the 2004 Kent Landscape Value Assessment, and subsequent Kent Structure Plan).

In determining the previous application, the Council refused the application on the following (2nd ground):

The application site lies within the locally designated Higham Arable Farmlands Landscape Character Area, where local and national 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 dwelling, the associated hardstanding, lighting, car parking and residential paraphernalia. The application is therefore contrary to Policy CS12 and CS19 of the Borough Council's

adopted Gravesham Local Plan Core Strategy (September 2014) and Section 15 of the National Planning Policy Framework (NPPF) 2021.

The officer, within their delegated report, includes the following statement:

'The 2009 Landscape character Assessment lists the following key characteristics found within the Higham Arable Farmlands as follows:

- *Very gently undulating topography with open arable farmland*
- *views out to the marshes and the River Thames in the north*
- *Original Saxon village of Lower Higham and more recent development to the south*
- *Marsh side hamlets and settlements with isolated farmsteads and scattered properties with locally distinct styles and materials*
- *Pockets of orchard and garden nurseries'*

Whilst the above is true, the 'Gravesham Landscape Sensitivity and Capacity Study' of 2016 reads that the previous study found:

The Higham Arable Farmlands character area is found to the east of Gravesham, and the following key characteristics identified in the Borough Landscape Character Assessment are relevant to assessment parcels defined around Gravesend:

- *Very gently undulating topography*
- *Open arable farmland*
- *Views out to the marshes and the River Thames in the north*
- *Isolated farmsteads and scattered materials and properties with locally distinct styles.*

*The condition of the landscape of the Higham Arable Farmlands character area is assessed as **poor**, due to the fragmented land use and visual detractors including large pylons, rail siding and poly tunnels. Sensitivity is assessed as **moderate**, due to a balance between locally distinctive houses/farms and indistinct recent buildings with other landscape features such as hedgerows in poor condition. [Reports emphasis]*

the report goes on to later read:

*The Borough Landscape Character Assessment assesses the condition of the Higham Arable Farmlands character area as **poor**, principally because intensive arable agriculture has resulted in a lack of hedgerow boundaries, lack of maintenance of old orchards and consequently a weak functional unity. Sensitivity is assessed as **moderate**: it is noted that "isolated properties and farmsteads provide local distinctiveness, in contrast with more recent development within Higham and Lower Higham", but that landscape features and elements are typically "**indistinct**", and sense of place is "**weak**". [our emphasis]*

None of the above is to suggest that the proposal site is not within an attractive landscape, however, it is disingenuous to suggest that the addition of a single house within a cluster of existing housing, specifically in such a context as that of the application site is 'harmful' to a

landscape described as above, particularly where the Council's own assessment specifically indicates that the isolated properties and farmsteads within the landscape provide local distinctiveness in what is otherwise an 'indistinct' landscape suffering from a 'weak' sense of place.

The proposed development would form an infill within an established building line; the impact from the perspective of a use of Green Farm Lane would be relatively small, given that the building would be well contextualised by the existing built form.

From an east-west visual perspective, the proposed building would be more apparent. In order to ensure that the east-west view through the hamlet is protected, the proposed dwelling has been set to the south of the plot, retaining the gap on the northern portion of the site. As outlined previously, the building would clearly form part of a small built cluster in the landscape, and would not appear to extend that cluster or encroach further into the landscape than the existing cluster.

Taking a broader landscape perspective, the area is strongly characterised by small clusters of dwellings and buildings situated amongst otherwise large field expanses; examples can be found on Green Farm Lane to the south, Lower Higham Road to the north-west, Church Lane to the east, and notably along the A226 (Gravesend Road) to the south. The introduction of an additional dwelling, centrally within an existing cluster, would have no detrimental impact on landscape character or wider sense of place.

The generally undulating nature of the landscape assists in prevent longer-range views to and from the site, however, where views are available without disruption, largely looking south from Lower Road and Lower Higham Road, the additional dwelling would be seen entirely within the context of, and centrally within, the existing cluster of dwellings.

Given the above, the visual impact on the wider landscape would be limited and is not considered harmful to sense of place or the wider value of the landscape.

The proposal is entirely in compliance with CS12 and CS19 in this respect.

Ecology

Paragraph 180 of the NPPF relates to habitats and biodiversity and sets out the principles that local planning authorities should apply when determining planning applications.

At a local level Policy CS12 of the Core Strategy states the following:

'There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.'

The site is overgrown and contains a hedgerow adjacent to the highway as well as some areas of dense undergrowth.

Within the pre-app response, the Council provided the following guidance:

In light of the requirements of the NPPF and Policy CS12 of the Core Strategy, any planning application should be accompanied by a biodiversity report which demonstrates that the requirements of the NPPF and Policy CS12 of the Core Strategy would be satisfied.

The third reason for refusal within the 20230438 application read:

3. The applicant has failed to provide any ecological evidence assessment covering the impact of the development on wildlife including reptiles. Together with the significant loss of mature landscaping and scrub land, the proposal would result in a biodiversity net loss, contrary to Policy CS12 of the Gravesham Local Plan Core Strategy (September 2014) and paragraphs 180 and 181 of the National Planning Policy Framework (NPPF) 2021.

and this was supported by Kent County Council ecology, who requested, in short, an appropriate BNG calculation, and appropriate on-site ecological surveys and mitigation strategy.

Both of these are contained within the new submission.

It is necessary to ensure that any development mitigated any ecological impact it may have. Appropriate surveys have been undertaken and included within this submission, and a landscaping scheme developed to provide a **20% Biodiversity Net Gain**, as demonstrated within the newly submitted Biodiversity Net Gain Report.

Further, an Ecological Impact Assessment is now contained within the submission, with appropriate surveys and analysis undertaken to understand the ecological potential of the site.

The fourth reason for Refusal contained within the previous Decision Notice read:

The proposal fails to secure a contribution towards strategic mitigation measures within Special Protection Areas, and in the absence of this contribution or adequate information to inform an Appropriate Assessment, the development fails to comply with the requirements of the Habitat Regulations and Section 14 (specifically paragraphs 180 and 181) of the National Planning Policy Framework 2021 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

In order to prevent the recurrence of this, the appropriate 'SAMMS' payment will be made to mitigate the 'harm' produced through the addition of one unit, in accordance with the Council's identified 'SAMMS' mitigation strategy.¹

In light of the above, the proposal is considered in accordance with CS12 of the Core Strategy, and Reason 3 and 4 of the previous decision are considered appropriately addressed.

¹ (<https://www.gravesham.gov.uk/planning/samms-tariffs>)

Highways

Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Policies T1 and P3 of the Gravesham Local Plan First Review November 1994 require new development to mitigate its impact on the highway and public transport networks and to provide sufficient parking in accordance with adopted parking standards. The Borough Council's adopted Vehicle Parking Standards set out the requirements for residential parking.

In providing the pre-application response, the Council sought advice from the Council's Highways Development Management Officer, who provided the following comments:

Given the location on a country lane subject to the national speed limit careful consideration will need to be given to the sight lines that are available at the access. Given that the site is located in open countryside for 60mph, Manual for Streets suggests that sight lines should be 203m x 2.4m x 203m and these will pass outside the land controlled by the applicant, but this is not unusual for accesses. Should the visibility be restricted then the speed of traffic is also liable to reduce and so reduce the sight line requirement.

It is suggested that there should be no boundary treatment, hard or soft landscaping over 850mm above carriageway height for the first 2.4 metre width of the application site adjacent to the highway to protect sight lines in the interests of highway safety.

There should be a minimum of three car parking spaces for the property, to provide an additional space for visitors, as on street parking would not be safe on this road particularly at night.

Secure cycle parking at the rate of one cycle per bedroom should be provided. The garage should be sized in accordance with SPG4. Minimum Length 5.5metres and minimum width 3.6 metres

Plentiful on site parking could be provided, with three spaces indicated (to meet the standard implied above) and sufficient space for a further vehicle with independent access shown.

Visibility splays from the site are sufficient, and planting has been designed to be well set back from the highway to prevent any risk of overgrowth preventing appropriate sight lines.

Cycle parking would be provided within the garage, which has been amended to reflect the standard provided within the pre-app response.

Amenity

The proposed dwelling would not have a detrimental impact on neighbouring amenity, given the sufficient distances available to avoid any over-looking, in-looking, and overshadowing.

Self-build

The Self Build and Custom Housebuilding Act 2015 came into place on 1 April 2016 and puts a duty on Councils to keep a register of individuals and organisations who want to acquire land for self-build homes, and to have regard to this register in carrying out its planning, housing, land disposal and regeneration functions.

Self-build and custom-build housing is defined in the NPPF as 'Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act. Local Authorities are required to hold a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for their own self-build and custom housebuilding. Planning Policy Guidance details states that relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.

The Council's Strategic Housing Market Assessment (SHMA) (June 2016) outlines that the Council should consider the appropriate policy approach to support the growth of the custom and self build sector in the Borough. It is outlined that: 'This could relate specifically to the continued support for small windfall and infill development opportunities, and the designation of appropriate sites to facilitate this' (paragraph 8.15).

In previous Appeals, the Council acknowledged that it has no current policy for delivering self-build housing and an emerging policy is not imminent. In such circumstances, there are clear benefits derived from the proposal to meeting housing needs.

Although no recent SHMA has progressed, given the lack of progress on any emerging Local Plan, the 2016 SMHA already identified 203 individuals on the register, a number which is likely to have substantially increased.

Further, the Council has so far made little to no substantial progress towards the delivery of a Plan to contain an appropriate self-build policy, so that serviced sites may come forward elsewhere in the Borough.

Since there are no relevant development plan policies in relation to custom and self-build homes, the Local Plan is considered to be out of date for the purposes of assessing the application proposal. Therefore, in accordance with paragraph 11 the NPPF, the presumption in favour of sustainable development should be applied and permission granted. There are no clear reasons for refusing the development and there are no adverse

impacts that would significantly and demonstrably outweigh the benefits (reference paragraph 11d) of the NPPF.

Case for Very Special Circumstances

Kent Planning Consultancy do not believe that a case for 'Very Special Circumstances' is required in this instance, as the proposal is 'infill' in accordance with the NPPF, however, for the purposes of aiding the authority in its decision making, the below is provided:

The first reason for Refusal identified in determining the previously submitted application read:

The site is within the approved 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 2021 Section 13 (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 1 additional dwelling, 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 Section 13 (Protecting Green Belt Land) of the National Planning Policy Framework (NPPF) 2021, and Policy CS02 (Scale and Distribution of Development) of the Borough Council's adopted Gravesham Local Plan Core Strategy (September 2014).

The NPPF reads:

147.

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148.

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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.

In this instance, Kent Planning Consultancy consider the following add cumulatively to a case for 'very special circumstances':

- The delivery of 20% biodiversity net gain, well above the 10% required by the Environment Act;

- The delivery of a home in the face of a 2.9 year '5 year housing land supply';
- The delivery of a self-build home within the context of a lack of policy provision for self-build sites within the Borough, and no emerging policy.

As little visual harm has been identified, and notwithstanding the KPC do not believe that VSC is required in the first instance, we consider that the above would represent a sufficient 'very special circumstances case'.

7.0 CONCLUSION

This Planning Statement has been prepared by Kent Planning Consultancy on behalf of Mr Suki Randhawa to Gravesham Borough Council, as local planning authority, for the development potential of a site located at:

Land Adj. 4 Chalk Pit Cottages, Green Farm Lane, Shorne, Gravesend, DA12 3HN

The development proposal description is:

'Erection of a new dwellinghouse'

In reviewing the sites, it has been identified that the site is constrained by its location within the Green Belt. The site does not appear to have been subject to any previous development.

The subsequently submitted proposal under ref. 20230438 was refused by the Council on four grounds which can be summarised as concerned Green Belt, local landscape, ecology, and SPA mitigation. These are addressed within this submission.

Kent Planning Consultancy are of the view that the proposal does not conflict with the five purposes of the Green Belt as set out within the NPPF, and would meet the 'exception' tests, in that the proposal would represent a limiting infill within the established building line and built form that forms the existing hamlet on Green Farm Lane.

The landscape impact, as with the Green Belt impact, is considered substantially mitigated by the proposed buildings location within the centre of a small cluster of buildings on Green Farm Lane. The building would not impact the landscape users wider sense of openness above the appearance. The proposal includes clear improvements to the land, which is currently in an overgrown and dilapidated condition with signs of abandonment and waste.

The proposed dwellings design has been amended, following pre-application engagement with the Council, to reflect the neighbouring properties and local vernacular. Traditional materials have been utilised.

Four on-site parking spaces have been provided, each independently accessible, to ensure that no on-road parking occurs, and appropriate splays are available.

The site delivers ecological and biodiversity enhancements in excess of local policy and in excess of forthcoming legislative minimums, with a 20% BNG provided.

Given the above, KPC consider the proposal in line with local and national planning policy, and politely request that permission be granted.