

LPA Ref: 20260810

Date: 11/09/2026

Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

To whom it may concern,

RE: Letter of objection relating to planning application 20260810 for the redevelopment, enlargement and alteration of the existing steel-framed barn and timber barn and change of use to residential to create 3 new dwellings, gardens, car parking and associated works at Filborough Farm, Lower Higham Road, Gravesend, Kent, DA12 2NY ("the Site").

Following the publication of the application listed above, with the deadline for representations being the 17th of September 2026, [REDACTED]

has been instructed to object to the proposal on behalf of [REDACTED]

[REDACTED] As it stands, the Client has concerns about significant potential harm of residential amenity, harm to the openness of the Green Belt, and an increase in risk to highway safety, deeming the application contrary to policies CS14 and CS19 from the Core Strategy (CS) and GB7 from the National Planning Policy Framework (NPPF).

Green Belt

The principal concern is whether the proposal constitutes appropriate development in the Green Belt. Although Gravesham Borough Council is presently unable to demonstrate a five-year supply of deliverable housing sites, this does not remove the requirement for the proposal to satisfy policies GB6 and GB7 of the National Planning Policy Framework (NPPF).

The Applicant first suggests that the Site constitutes previously developed land. However, the NPPF definition expressly excludes land that is, or was last, occupied by agricultural or forestry buildings. The submitted Planning, Design and Access Statement confirms the historic agricultural use of the Site and buildings. Accordingly, the Site cannot reasonably be treated as previously developed land and the proposal cannot rely upon the exception under policy GB7(e).

The Applicant also asserts that the Site comprises grey belt land for the purposes of policy GB7(g), but provides no substantive assessment to support this conclusion. Grey belt status cannot simply be assumed. It must be demonstrated that the land does not

strongly contribute to any of the Green Belt purposes identified in policies GB2(a), (b) or (d). No assessment of the Site against these purposes has been submitted.

Furthermore, policy GB7(g) contains a series of cumulative requirements. In addition to establishing that the Site comprises grey-belt land, the Applicant must demonstrate that the proposal would not fundamentally undermine the purposes of the remaining Green Belt and that it would be situated in a sustainable location, with particular reference to policy TR3. The submitted information does not adequately address either matter.

While the Council's housing-land-supply position may establish an unmet need for housing, this satisfies only one element of policy GB7(g). It does not establish that the Site is grey belt, that the development would avoid fundamentally undermining the remaining Green Belt or that the Site represents a sustainable location.

The absence of an assessment is particularly important because the proposal is not limited to the straightforward conversion of the existing buildings. The application expressly seeks their redevelopment, enlargement and alteration, including a substantial increase in the height and scale of Units 2 and 3. These changes would materially increase the prominence of built development and intensify the residential character and activity of the Site.

On the evidence submitted, the Applicant has therefore failed to demonstrate that the proposal falls within either of the Green Belt exceptions upon which it relies. The development should consequently be treated as inappropriate development under policy GB6. Substantial weight must be given to the resulting Green Belt harm, including harm to openness, and planning permission should not be granted unless very special circumstances clearly outweigh that harm and all other identified harm. No such case of VSC has been demonstrated.

Parking & highway safety

The proposed parking provision is also inadequate. Each dwelling would be provided with two parking spaces, resulting in six spaces overall. However, the Kent County Council Parking Standards (January 2025) indicate that four-or-more-bedroom dwellings in rural locations should provide three spaces per dwelling.

Although Units 2 and 3 are labelled as three-bedroom dwellings with studies, each study appears capable of functioning as an additional bedroom. The parking requirement should reflect the realistic capacity and likely occupation of the dwellings rather than the description assigned to individual rooms. On this basis, all three units should be assessed as four-bedroom dwellings, requiring nine resident spaces in total, together with any appropriate visitor provision. No evidence has been provided to justify a departure from the applicable standard, particularly given the rural location, limited access to sustainable transport and absence of suitable on-street parking.

The existence of an adjacent Public Right of Way does not establish that the Site is sustainably located. The route to Chalk is understood to exceed 1.5 km, while the intervening highway environment includes sections without footways or street lighting. These conditions would discourage routine walking, particularly during hours of darkness and by children, older people and those with limited mobility. Future residents would

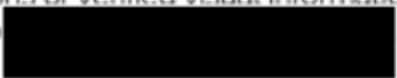
therefore be heavily reliant upon private vehicles for access to day-to-day services and facilities. This weighs against the claim that the proposal occupies a sustainable location, including for the purposes of policy GB7(g)(iii).

The combination of inadequate parking and limited opportunities for safe and convenient travel has therefore not been satisfactorily addressed.

Residential amenity

Policy CS19 of the Gravesham Local Plan Core Strategy requires development to integrate appropriately with its surroundings and safeguard the amenity of neighbouring occupiers.

Units 2 and 3 would increase from approximately 3.6 m to 8 m in height when viewed from the rear. Given the relationship between these buildings and our Client's property, this substantial increase in height, bulk and massing would materially alter the outlook currently experienced from the dwelling and garden. The resulting built form would appear considerably more dominant and overbearing than the existing agricultural structures.

The Applicant's assertion that the development would improve the appearance of the buildings does not address its effect upon neighbouring living conditions. An improvement in the appearance of the Site cannot justify an unacceptable effect upon residential amenity. The submitted documents do not provide a sufficiently detailed assessment of the proposal's relationship with the adjoining property, including accurate sections or verified visual information demonstrating the change in scale when viewed from .

Photographs showing the existing buildings from the adjoining garden are included below to demonstrate the relationship and the likely prominence of the proposed development.



The proposal would therefore conflict with Policy CS19 by reason of its excessive height, bulk and overbearing relationship with the adjoining property.

Design & heritage impact

The proposed development would also affect the setting and significance of the adjacent Grade II listed buildings. The agricultural buildings and their surrounding land form part of the rural context in which those heritage assets are experienced. The introduction of three substantial residential units, together with their domestic parking, gardens, lighting and associated activity, would materially change that relationship.

The proposed height and domestic appearance of Units 2 and 3 would diminish the agricultural character of the Site and introduce a form of development that would appear incongruous within this rural historic setting and this section of Lower Higham Road. While the sensitive reuse of traditional agricultural buildings may secure heritage benefits, those benefits depend upon the development retaining the buildings' character, modest scale and relationship with their surroundings.

The application is not supported by a proportionate assessment that clearly identifies:

- the significance of each affected heritage asset;
- the contribution made by the Site and its agricultural character to that significance;
- the effect of the proposed height, scale, domestic appearance and associated activity;
- the degree of any resulting heritage harm; and
- any measures incorporated to avoid or minimise that harm.

The assertion that the proposal would result in less than substantial harm is insufficient without the assessment required by policy HE5 of the NPPF. Any harm to the significance of a designated heritage asset, including harm arising from development within its setting, must be given considerable importance and weight and weighed against clearly identified public benefits in accordance with policy HE6.

The proposal consequently fails to demonstrate compliance with policies CS19 and CS20 of the Gravesham Local Plan Core Strategy and policies DP3, HE5 and HE6 of the NPPF.

Other matters

The application documents assess the proposal principally against the December 2024 NPPF. The August 2026 NPPF replaced that version and its decision-making policies took effect immediately upon publication. The application must therefore be determined against the current Framework, including policies S3, GB6, GB7, DP3, TR3, TR4, TR6, HE5 and HE6.

The absence of an updated assessment is particularly material because the 2026 Framework introduced revised tests for development outside settlements, Green Belt development, design, transport and heritage effects. However, it is accepted that the proposed development was submitted prior to the alteration to the NPPF.

Conclusion

Based on the above assessment, it is concluded that the proposed development cannot reasonably be considered to constitute appropriate development in the Green Belt by virtue of a lack of sufficient assessment. Moreover, it fails to accord with KCC's Parking Standards and would result in harm to the setting of the heritage assets, whilst harming the amenity of the adjoining dwelling.

We trust that this letter is of assistance.

Yours sincerely,

