



PLANNING STATEMENT

Project: Land North of Cherry Trees, Ridge Lane, Meopham, Gravesend, Kent

Proposal: Retrospective change of use for the siting of 4 pitches for Gypsy/Traveller occupation to include one static, one touring caravan and one amenity building on each pitch. Associated changes in land levels and hard/soft landscaping.

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1. Introduction

- 1.1 This statement has been prepared in support of my clients' planning application. This is in relation retrospective change of use for the siting of 4 pitches for Gypsy/Traveller occupation to include one static, one touring caravan and one amenity building on each pitch. Associated changes in land levels and hard/soft landscaping.
- 1.2 Firstly, this statement will set out the details of the site description to provide a context in which the proposal has been designed. Secondly, we review the sites planning history and set out the details of the proposal subject of this application. Next we provide a summary of the relevant planning national and local planning policies. Following this we set out a detailed assessment of the proposal and the relevant material considerations. Finally, we provide a summary of the benefits of the proposal and why we consider that it should be approved.
- 1.3 In addition to this statement the following documents have been provided;
 - Application forms
 - Site Location Plan and Block Plans
 - Mobile home floor plans and elevations
 - Day room floor plans and elevations

2. Site Description

- 2.1 The application site comprises a roughly rectangular parcel of land located on the western side of Ridge Lane. The site extends to approximately 0.55 acres (circa 0.22 hectares) and is currently characterised by open land with areas of informal vegetation and sporadic tree coverage. The landform is generally level with some minor variations in ground levels across the site. The site is enclosed in part by existing boundary treatments, including vegetation and fencing, which provide a degree of visual containment from the surrounding area.
- 2.2 In planning policy terms, the site is located within the Metropolitan Green Belt. It lies to the east of the settlement of Culverstone Green and is therefore positioned within a predominantly rural context, albeit one that is influenced by dispersed residential development along Ridge Lane and surrounding roads. The site is situated within Flood Zone 1, as defined by the Environment Agency, indicating a low probability of flooding. There are a number of trees within and adjacent to the site; however, none are subject to Tree Preservation Orders, nor is the site located within a Conservation Area. Furthermore, the site is not subject to any statutory ecological or landscape designations, and there are no known heritage assets within or immediately adjoining the site that would constrain development.
- 2.3 Whilst Ridge Lane is rural in character, it is not isolated. The surrounding area is typified by a pattern of sporadic residential development, including detached dwellings set within relatively generous plots. There are a number of established residential properties in close proximity to the site, resulting in a semi-rural environment that combines countryside characteristics with a clear residential presence. This pattern of development contributes to a sense of enclosure along parts of Ridge Lane and reduces the perception of remoteness often associated with more isolated Green Belt locations.
- 2.4 In terms of accessibility to services and facilities, the site benefits from a reasonably sustainable location relative to the nearby settlement of Culverstone Green and the wider area. Culverstone Green provides a limited range of day-to-day services and community facilities, including local convenience provision, a primary school, and community meeting spaces. A wider range of services, including supermarkets, healthcare facilities, secondary education, and employment opportunities, can be found in nearby settlements such as Meopham and Gravesend, which are accessible by private vehicle and public transport.
- 2.5 Public transport provision in the vicinity includes bus services operating along routes within reasonable proximity of the site, providing connections to surrounding towns and villages. Meopham railway station, located within a short driving distance, offers regular services to larger urban centres, thereby enhancing the site's overall connectivity.

3. Planning History and Proposal

Relevant Planning History

- 3.1 No specific planning history to the site.
- 3.2 Notwithstanding the absence of site-specific planning history, there are two recent appeal decisions of direct relevance within the surrounding area, which provide important context in assessing the current proposal. These are referenced as:
- APP/K2230/C/24/3349903
 - APP/K2230/W/25/3363212
- 3.3 Both appeals relate to Gypsy and Traveller development within the wider locality and therefore carry material weight in establishing how national and local planning policy is being interpreted in comparable circumstances.
- 3.4 The appeal decisions collectively highlight several key considerations:
- Need for Gypsy and Traveller accommodation: Inspectors have consistently attributed significant weight to the identified unmet need for Gypsy and Traveller pitches within the Borough, in line with national policy set out in the Planning Policy for Traveller Sites (PPTS).
 - Green Belt considerations: In both cases, the development was assessed against Green Belt policy, with particular regard to whether the proposals constituted inappropriate development. While harm to the Green Belt was identified, Inspectors considered whether “very special circumstances” existed, including personal circumstances and unmet need, which could outweigh this harm.
 - Sustainability of location: The Inspectors examined the relative accessibility of the sites to services and facilities, recognising that rural or semi-rural locations can still be considered sustainable for Gypsy and Traveller sites where there is reasonable access to day-to-day services, either by non-car modes or short vehicular journeys.
 - Impact on character and appearance: Consideration was given to the extent to which the proposals would integrate with the surrounding pattern of development. In similar contexts characterised by dispersed or linear development along rural lanes, Inspectors have found that well-contained sites can limit wider landscape harm.
 - Personal and unmet need factors: In both appeals, personal circumstances and the lack of alternative lawful sites were important material considerations, often carrying substantial weight in the overall planning balance.
- 3.5 Overall, these appeal decisions demonstrate a clear and consistent approach whereby harm to the Green Belt and countryside character is balanced against the pressing need for Gypsy and Traveller accommodation and other site-specific considerations. They confirm that, in appropriate circumstances, such proposals may be found acceptable where material considerations clearly outweigh identified harm.

Planning Proposal

- 3.6 Planning permission is sought for the retrospective change of use of the land to facilitate the siting of 4 Gypsy/Traveller pitches. Each pitch comprises one static caravan, one touring caravan, and one associated amenity building, together with ancillary works including alterations to land levels and the provision of hard and soft landscaping.

- 3.7 The development has been designed to provide a well-organised and functional layout that meets the day-to-day living needs of the intended occupants, whilst maintaining an appropriate relationship with the surrounding area.
- The site is intended to be occupied by a single extended family, with the land subdivided into four distinct pitches. This arrangement reflects the cultural and social needs of Gypsy and Traveller communities, enabling family cohesion whilst providing a clear and structured layout.
 - Each pitch would accommodate one static caravan for residential use, one touring caravan, and a modest amenity building containing essential facilities such as kitchen, bathroom, and utility space. Each pitch would also benefit from an area of private outdoor amenity space.
 - Vehicular access to the site is taken from Ridge Lane, utilising an established point of access. The internal layout has been designed to ensure safe and convenient movement throughout the site.
 - Each pitch would be served by dedicated parking provision for up to two vehicles, in addition to space for the siting of caravans. The layout allows for adequate manoeuvring space within the site, ensuring that vehicles are able to enter, turn, and exit in a forward gear, thereby promoting highway safety.
 - The proposal includes associated engineering operations, including minor regrading of land to create level pitches, along with the introduction of appropriate hardstanding surfaces and soft landscaping. Landscaping will assist in assimilating the development into its surroundings, reinforcing site boundaries, and minimising visual impact when viewed from Ridge Lane and the wider area.
- 3.8 Overall, the proposal represents a small-scale, low-density form of development that is consistent with the established pattern of dispersed residential uses in the locality. The scheme has been carefully designed to provide an appropriate standard of accommodation whilst ensuring that impacts on the character of the area and the openness of the Green Belt are appropriately managed.



Figure 1: Proposed Block Plan

4 National Planning Policy Summary

- 4.1 The NPPF (2024) sets out the government's planning policies which Local Plans need to accord with. Relevant paragraphs include;

Achieving Sustainable Development

- 4.2 Para 7 of the NPPF states that 'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.
- 4.3 Para 8 states that Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
 - **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Presumption in favour of sustainable development

- 4.4 Para 11 of the NPPF states that '*plans and decisions should apply a presumption in favour of sustainable development.*'
- 4.5 For **decision-taking** this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Achieving well-designed places

- 4.6 Para 131 relates to achieving good design and states that '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.'

- 4.7 Para 135 states that; Planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Planning Policy for Traveller Sites – 2024

- 4.8 This brief document sets out the Government's planning policy for traveller sites and should be read in conjunction with the National Planning Policy Framework. This document has been recently updated.
- 4.9 Within Policy H, states within paragraph 24 states that ;
'Applications should be assessed and determined in accordance with the presumption in favour of sustainable development and the application of specific policies in the National Planning Policy Framework and this planning policy for traveller sites.'
- 4.10 Paragraph 25 states that *'Local Planning Authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:*
- a) *The existing level of local provision and need for sites*
 - b) *The availability (or lack) of alternative accommodation for the applicants*
 - c) *Other personal circumstances of the applicant*
 - d) *That the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites.*
 - e) *That they should determined applications for sites from any travellers and not just those with local connections.'*
- 4.11 Paragraph 28 states that *'if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.'*
- 4.12 With regards to sites within the Green Belt Paragraph 16 states that *'inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in chapter 13 of the NPPF apply.'*

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- 4.13 Paragraph 18 goes on to confirm that *'The Golden Rules, set out in chapter 13 of the NPPF do not apply to traveller sites.'*
- 4.11 Paragraph 28 states that *'if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.'*
- 4.12 With regards to sites within the Green Belt Paragraph 16 states that *'inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in chapter 13 of the NPPF apply.'*
- 4.13 Paragraph 18 goes on to confirm that *'The Golden Rules, set out in chapter 13 of the NPPF do not apply to traveller sites.'*

5 Local Planning Policy Summary

Gravesham Local Plan Core Strategy – 2014

5.1 The Core Strategy was adopted in September 2014 and sets out the Councils long term spatial vision for the Borough. The Core Strategy covers the period from April 2011 to March 2028.

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

5.2 Policy CS01 relates to sustainable development and states that;

Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic social and environmental conditions in the area.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

5.3 Policy CS17 relates to the Provision of Traveller Sites and states that:

The Council will seek to meet the housing needs of Travellers in the Borough by:

- *Safeguarding traveller sites with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need;*
- *Investigating opportunities to extend existing permanent sites within the urban area; and*
- *Supporting new sites within the urban area and rural settlements inset from the Green Belt which accord with policies in this plan, in particular those relating to Development and Design Principles, Climate Change, Green Infrastructure, and Heritage and the Historic Environment.*

5.4 The supporting text of Policy CS17 states that:

'Site allocations and a criteria-based policy will be included within the Site Allocations and Development Management Policies Development Plan Document (DPD). In advance of producing the DPD, planning applications for windfall sites will be considered against the provisions of the National Planning Policy Framework and the Planning Policy for Traveller Sites.'

5.5 Whilst the supporting text states that a criteria based policy will be included within the SADMP Plan, this is yet to be adopted and is significantly overdue.

Gravesham Local Plan First Review Saved Policies – 2014

5.6 The Local Plan was originally adopted in November 1994. In September 2007 a number of policies were saved through direction from the Secretary of State. In September 2014 the Council adopted their Core Strategy and as a result a number of saved policies were deleted. The remaining saved policy is relevant to this proposal are as follows;

- Policy P3 – Vehicle parking standards

Site Allocations and Development Management Policies

5.6 A second regulation 18 consultation was carried out between October and December 2020. No further consultations have been carried out since this time. It is understood that there have been delays to the progression of the Emerging Plan due to highways modelling. The latest document available on the Council's website is a consultation document and does not contain draft policies which can be referred to. The publication of the Council's Regulation

Need for Gypsy and Traveller Sites

5.7 The most recent Gypsy and Traveller Accommodation Assessment (GTAA) for the Borough was prepared in 2017 and published in 2018. Owing to its age, the evidence base is now significantly out of date and should be afforded only limited weight in decision-making. Notwithstanding this, the GTAA identified a need for between 13.8 and 25.4 additional pitches over the period April 2023 to March 2028. Given the passage of time and the likelihood of changing household formation rates, this figure is likely to represent a conservative estimate of current need.

5.8 More recent appeal decisions within the Borough confirm that the local planning authority is unable to demonstrate a robust and up-to-date supply of deliverable Gypsy and Traveller sites. In particular, in appeal ref. APP/K2230/W/24/3336250, the Inspector confirmed that *"it is common ground that the Council cannot demonstrate an up to date 5 year supply of deliverable sites."* This is a significant material consideration in the determination of planning applications for Gypsy and Traveller accommodation.

5.9 Furthermore, the Inspector identified a clear policy gap within the development plan. At present, the Council does not have an adopted criteria-based policy for determining applications for Gypsy and Traveller sites, as required by paragraph 11 of the Planning Policy for Traveller Sites (PPTS). While such a policy is intended to be included within the emerging Site Allocations and Development Management Policies Plan (SADMP), this document has been subject to repeated delays and remains at an early stage in the plan-making process. The Inspector noted:

"The Council anticipates that both a review of the Local Plan Core Strategy and Site Allocation and Development Management Policies Document (SADMP) will be subject to Regulation 19 consultation in 2024, with adoption no sooner than 2025... the emerging plan does contain a criteria based policy, but the parties agree this carries limited weight."

In addition, the decision highlights a longstanding failure in plan-making:

"It is clear that there has been a failure of policy with the timescale for the adoption of the SADMP having slipped several times... the Council have not had a criteria based policy since at least 1994."

This absence of an up-to-date policy framework significantly undermines the Council's ability to effectively plan for and manage Gypsy and Traveller accommodation needs.

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- 5.10 In the absence of an up-to-date development plan and a deliverable supply of allocated sites, the identified need must, in the interim, be addressed through the determination of windfall applications, such as the current proposal. This approach is consistent with national policy, which seeks to ensure that the accommodation needs of Gypsies and Travellers are met in a timely manner.
- 5.11 It is also important to recognise that approximately 77% of the Borough is designated as Green Belt. As such, it is inevitable that a significant proportion of potential and future Gypsy and Traveller sites will fall within the Green Belt designation. This presents an inherent constraint on site delivery and further reinforces the importance of considering suitable small-scale windfall developments on their merits. The Inspector in the above appeal also addressed the relationship between unmet need and Green Belt policy, concluding:
- “In accordance with the PPTS... lack of supply should be a significant material consideration... when considering the grant of a temporary planning permission. However... this does not apply to sites within... the Green Belt. It also does not say that the lack of supply is a significant material consideration when considering permanent schemes.”*
- 5.12 Notwithstanding this, Inspectors have consistently recognised that unmet need remains an important material consideration in the overall planning balance, particularly when combined with other factors such as personal circumstances, lack of alternative sites, and the absence of a policy framework.
- 5.13 Further weight is added by more recent appeal decisions in the local area (refs. APP/K2230/C/24/3349903 and APP/K2230/W/25/3363212), which reinforce the ongoing shortfall in Gypsy and Traveller provision and the Council's continued reliance on an out-of-date evidence base. Across these decisions, Inspectors have consistently:
- Recognised that there remains a clear and persistent unmet need for Gypsy and Traveller pitches within the Borough;
 - Afforded limited weight to the existing GTAA due to its age, whilst acknowledging that it still points to a meaningful level of need;
 - Identified the absence of a five-year supply of deliverable sites as a significant deficiency;
 - Noted the lack of an adopted criteria-based policy as a critical gap in the development plan; and
 - Confirmed that emerging policies within the SADMP can only be given limited weight at this stage.
- 5.14 Importantly, these decisions demonstrate that, in the current policy vacuum, appropriately located and well-designed windfall sites play a crucial role in addressing immediate accommodation needs. Inspectors have therefore placed considerable emphasis on the contribution that small-scale proposals can make towards meeting this unmet need, even where policy constraints—such as Green Belt designation—are present.
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5 Planning Assessment

Principle of Development

- 6.1 We acknowledge that the site is located within the Green Belt and therefore consideration should be given to whether the proposal would comprise appropriate development or not. Paragraph 153 of the NPPF states that *'inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.'* Paragraph 153 goes on to state that; *'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.'*
- 6.2 Paragraph 154 set out exceptions to inappropriate development within the Green Belt. One exception within paragraph 155 states that material changes in the use of land can be considered acceptable providing they preserve its openness and do not conflict with the purposes of including land within it. Paragraph 155 sets out a further exception to inappropriate development within the Green Belt. The PPTS confirms that 'the golden rules' do not apply to Gypsy and Traveller sites and therefore providing that proposals meet the requirements of bullet points a), b), and c), the development should be considered acceptable in principle.

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;

- 6.4 Grey Belt land 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. To assess whether the site would comprise grey belt land, we have assessed the site against purposes a), b) and d). Purposes a), b) and d) are set out in paragraph 143 as follows:
- a) to check the unrestricted sprawl of large built up areas
 - b) to prevent neighbouring towns merging into one another
 - d) to preserve the setting and special character of historic towns

The NPPG has been recently updated to provide additional guidance on how to assess whether a site meets purposes a), b) and d). This proposal has been assessed against the advice contained within this guidance.

to check the unrestricted sprawl of large built up areas

- 6.5 The guidance states that sites which contribute strongly to unrestricted sprawl are *'likely to be free of existing development and lack physical features in reasonable proximity that could restrict and contain development.'* In addition, the advice states that such sites are likely to result in an *'incongruous pattern of development (such as an extended "finger" of development into the Green Belt).'* The advice goes on to state that sites which make a 'moderate contribution' are likely to be adjacent or near to a large built up area but include features such as having physical features in reasonable proximity that restrict and contain development or be particularly enclosed by existing development. The policy requires that the land should not provide a 'strong' contribution to purposes a, b and d. Therefore, the site could be considered to moderately contribute towards purpose a) and the proposal could still be considered acceptable.
- 6.6 The proposal does not extend development into an open rural landscape, nor does it create an isolated protrusion of built form. The site is well contained through existing boundary treatment

Ridge Lane and neighbouring development. It therefore makes no more than a moderate contribution to this purpose, which remains compatible with Grey Belt classification.

to prevent neighbouring towns merging into one another

- 6.7 The guidance advises that sites which make a weak or no contribution to purpose b) are those which '*do not form part of a gap between towns.*' As this site does not form a gap between two towns, we consider that the proposal makes no contribution towards purpose b. Due to the location of this site, some distance away from a "town", the proposal would not contribute to a merging affect.

to preserve the setting and special character of historic towns

- 6.8 The guidance advises that sites which make a weak or no contribution to purpose b) are those which '*do not form part of the setting of a historic town.*' As this site does not form part of the setting of a historic town we consider that the proposal makes no contribution towards purpose d). As the site is not located within the setting of a historic town, this criteria does not apply here.

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

- 6.9 As set out in Section 5 of this statement, there is a clear and persistent unmet need for Gypsy and Traveller accommodation within the Borough. The most recent evidence base is out of date, and appeal decisions have confirmed that the Council cannot demonstrate a five-year supply of deliverable sites. This unmet need is significant and ongoing, and is likely to be greater than identified due to the age of the available evidence. In the absence of an up-to-date development plan and allocated sites, windfall developments such as the current proposal represent an important and necessary means of addressing this need.

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

- 6.10 Paragraph 155 of the National Planning Policy Framework (NPPF) requires that, in order for development on Grey Belt land to be considered acceptable in principle, it must be located in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework. In the context of Gypsy and Traveller development, footnote 57 directs decision-makers to have regard to paragraph 13 of the Planning Policy for Traveller Sites (PPTS), which provides a more nuanced and context-specific approach to sustainability.
- 6.11 A recent appeal decision relating to land at Heron Hill Lane, Culverstone (ref. APP/K2230/C/24/3349903) provides directly relevant and up-to-date guidance on how sustainability should be assessed in this rural context. In that case, the Inspector acknowledged that the site was accessed via a narrow, unlit rural lane with no footways, and that there were no shops or services within convenient walking distance. The Inspector also noted that occupiers would be likely to rely on private motor vehicles to access day-to-day services. However, the Inspector made clear that sustainability in the context of Gypsy and Traveller sites must be assessed "in the round", rather than through a purely urban-centric interpretation of accessibility.
- 6.12 In particular, the Inspector recognised that whilst opportunities for walking and cycling may be limited, there are nonetheless important sustainability benefits associated with the provision of a settled and lawful site. Paragraph 13 of the Planning Policy for Traveller Sites (PPTS) makes clear that the provision of a permanent base can reduce the need for long-distance travelling, limit the

environmental harm associated with unauthorised encampments, and enable improved and more consistent access to essential services such as healthcare and education. These considerations are highly relevant to the current proposal and weigh positively in favour of the development when sustainability is assessed in the round.

- 6.13 The Inspector further noted that facilities at Culverstone Green (approximately 1.5km from the appeal site) and the wider range of services available at Meopham (approximately 3km away) are reasonably accessible by short vehicular journeys. This reflects a realistic and pragmatic approach to rural living, where reliance on private vehicles is common and often necessary. In this regard, paragraph 110 of the NPPF confirms that opportunities to maximise sustainable transport solutions will vary significantly between urban and rural areas, and this should be taken into account in both plan-making and decision-taking. The Framework does not require rural sites to achieve the same level of accessibility as urban locations.
- 6.14 Importantly, the Inspector also concluded that there was no evidence to suggest that the appeal site performed materially worse, in sustainability terms, than other potential non-allocated sites that may come forward within the Borough. This is a critical point, given the acknowledged shortfall in Gypsy and Traveller site provision and the rural nature of the Borough, a significant proportion of which lies within the Green Belt. A similarly pragmatic approach must be applied in this case. There is no reasonable prospect that significantly more accessible sites will come forward in the short term, particularly in the absence of an up-to-date development plan and site allocations.
- 6.15 Applying the above reasoning to the current proposal, it is evident that whilst the site is located in a rural area and is not within easy walking distance of services, it is not isolated. It is located within a network of dispersed residential development and has access to services and facilities within a short driving distance, including those at Culverstone Green and the wider range available in Meopham. Furthermore, the proposal would provide a stable, lawful base for the occupiers, thereby reducing the need for unauthorised encampments and supporting improved access to essential services.
- 6.16 When assessed in the round, and having regard to the specific policy context for Gypsy and Traveller sites, the proposal can reasonably be regarded as being located in a sustainable location. This conclusion is consistent with recent appeal decisions in the locality and reflects a realistic and policy-compliant approach to rural sustainability. Accordingly, the proposal satisfies the requirements of paragraph 155 of the NPPF in respect of sustainability and therefore meets this element of the Grey Belt test.

Landscape

- 6.17 Policy CS19 of the Core Strategy seeks to ensure that all new development achieves a high standard of design that is both visually attractive and locally distinctive. The policy requires development to conserve and, where possible, enhance the character and quality of the local built and natural environment, and to integrate successfully with its surroundings. Similarly, Policy CS12 places emphasis on the conservation of the Borough's landscape, reflecting its intrinsic value and contribution to local character. These objectives are reinforced by the National Planning Policy Framework (NPPF), which recognises the importance of protecting and enhancing valued landscapes, whilst also supporting well-designed development that responds positively to local context.
- 6.18 The application site lies within the Harvel Wooded Downs Landscape Character Area. This landscape is characterised by a varied and often undulating topography, including steep-sided

valleys and elevated plateaux, together with extensive areas of ancient woodland, managed chestnut coppice, and a patchwork of small paddocks and pasture. The area also accommodates a dispersed pattern of development, including traditional farmsteads, individual dwellings, and smallholdings set within a predominantly wooded framework. Whilst this landscape is locally valued and contributes positively to the character of the area, it is not subject to any national landscape designation, such as an Area of Outstanding Natural Beauty. As such, whilst it is deserving of protection, it does not attract the highest level of policy constraint.

- 6.19 The immediate context of the site reflects this established pattern of dispersed and varied development. The wider woodland setting has, in places, been fragmented by existing residential plots, clearings, and associated domestic uses along Ridge Lane. The application site itself has been cleared; however, it remains visually contained by retained boundary vegetation and the surrounding tree cover, which continue to define the character of the area. It is acknowledged that the introduction of caravans, amenity buildings, hardstanding, and associated domestic paraphernalia has altered the character of the site from its previous undeveloped state. However, this change must be considered within its immediate context. The presence of other residential uses and mobile home plots along this section of Ridge Lane establishes a clear baseline of development against which the proposal is experienced.
- 6.20 In this context, the development does not appear isolated or incongruous, but rather reads as part of the existing pattern of small-scale, dispersed residential use. Furthermore, the site benefits from a good degree of natural containment. The combination of local topography, boundary vegetation, and surrounding tree cover significantly restricts wider views into the site, limiting its visual influence to the immediate locality.
- 6.21 Overall, whilst it is accepted that the proposal gives rise to a degree of localised landscape harm, this harm is limited in extent and does not result in any wider or strategic impact on the character of the Harvel Wooded Downs Landscape Character Area. The development is well contained, reflects the established pattern of development in the area, and does not materially undermine the key characteristics of the landscape. When considered in the planning balance, this limited and localised harm is clearly outweighed by the significant benefits of the proposal, in particular the provision of much-needed Gypsy and Traveller accommodation within the Borough.

Design and Character

- 6.22 The proposal has been designed to maximise the use of the site to facilitate the delivery of four pitches, whilst ensuring that the proposal would not appear overly cramped. The layout of the site has been carefully designed to make efficient use of the available land whilst delivering four Gypsy and Traveller pitches in a manner that provides an appropriate standard of accommodation. The arrangement of the development ensures that each pitch functions as a clearly defined and usable space, with sufficient separation between pitches to avoid any sense of overdevelopment or cramping.

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- 6.23 The scale and disposition of the caravans, amenity buildings, parking areas, and outdoor spaces have been considered holistically to create a balanced and legible layout. Adequate spacing is maintained to allow for privacy, safe circulation, and functional day-to-day living, whilst also ensuring that the overall density of development remains low and consistent with the prevailing character of the area.
- 6.24 Each pitch incorporates a modest amenity building (dayroom), which provides essential facilities required for modern living, including kitchen, bathroom, and utility space. The inclusion of these structures reduces the need for additional external structures or ad hoc additions, thereby contributing to a more orderly and visually coherent form of development. The design of the amenity buildings is intentionally simple and functional, reflecting their ancillary role to the caravans. Their scale and footprint are limited, ensuring that they do not dominate the site or appear visually intrusive within the wider context.
- 6.25 The overall design approach responds positively to the semi-rural character of the area. The use of appropriate materials, together with the incorporation of soft landscaping and boundary treatments, will assist in assimilating the development into its surroundings over time. The retention and reinforcement of boundary vegetation will further soften the appearance of the site and help integrate it into the existing landscape framework.
- 6.25 Taken as a whole, the proposal represents a well-considered and proportionate form of development that balances the need to maximise site efficiency with the requirement to respect local character. The scheme avoids an overly urban or regimented appearance and instead reflects the informal and low-density pattern of development that is characteristic of Gypsy and Traveller sites and the surrounding area.

Residential Amenities

- 6.26 The proposal has been carefully designed to minimise any potential impact on the residential amenities of neighbouring properties. In accordance with Policy CS19 of the Core Strategy, which seeks to ensure that development conserves and enhances the character of the local built and natural environment and integrates successfully with its surroundings, the layout and orientation of the four pitches ensure that adequate separation distances are maintained between the caravans, amenity buildings, and adjacent dwellings. These distances are consistent with established planning guidance and are sufficient to prevent undue overlooking, loss of privacy, or overbearing impacts.
- 6.27 The positioning of the development ensures that there will be no significant overshadowing of neighbouring gardens or habitable rooms. The single-storey scale of the static caravans and modest amenity buildings further limits any potential visual dominance and helps maintain a sense of openness within the immediate locality.
- 6.28 The internal layout of the site provides each pitch with its own private amenity space, parking, and circulation areas, ensuring that the development is functional and provides a high standard of residential amenity for its intended occupants. Careful attention has been given to the siting of communal areas and access points to prevent any conflict between vehicles, pedestrians, or neighbouring properties.
- 6.29 Overall, the proposal has been designed in a manner that respects the character and privacy of the surrounding residential environment. The development will not result in any material harm to the amenities of existing residents, and the separation distances, screening, and orientation of buildings all contribute to a safe and appropriate living environment for both current and future occupiers, fully reflecting the objectives of Policy CS19.

Highways and Parking

- 6.30 The proposed development will be accessed directly from Ridge Lane, utilising an existing access point. The layout of the site has been designed to ensure safe and convenient movement of vehicles within the site, allowing cars and touring caravans to enter, manoeuvre, and exit in forward gear. This approach aligns with the objectives of Policy CS19 of the Core Strategy, which requires development to integrate successfully with its surroundings and to avoid creating conditions detrimental to highway safety.
- 6.31 Each pitch is provided with dedicated parking for two vehicles and space for a touring caravan, ensuring that all vehicles associated with the site can be accommodated on-site. Sufficient circulation space is provided to avoid congestion or conflict between vehicles, pedestrians, or neighbouring properties. This layout reflects good design principles and promotes safe and convenient access for residents.
- 6.32 In terms of wider connectivity, the site is situated within a reasonable distance of services and facilities at Culverstone Green (approximately 1.5 km) and the village of Meopham (approximately 3 km). While access to these services by foot or bicycle is limited due to the rural nature of Ridge Lane, as recognised in the appeal decision for Heron Hill Lane (APP/K2230/C/24/3349903), the reliance on private vehicles is typical in rural contexts and is consistent with the guidance in paragraphs 110 and 115 of the NPPF, which acknowledge that opportunities for sustainable transport vary between urban and rural areas.
- 6.33 The Planning Policy for Traveller Sites (PPTS) emphasises that providing a settled base for Gypsy and Traveller families can reduce the need for long-distance travel and limit the environmental harm associated with unauthorised encampments. In this context, the development of a lawful, permanent site reduces unsustainable travelling, providing an overall sustainability benefit despite the site's rural location.
- 6.34 Given the above, the proposal provides safe, functional, and well-designed vehicular access, appropriate parking, and internal circulation that meets the needs of future occupants while maintaining highway safety. The development therefore complies with the relevant objectives of Policy CS19 and the broader transport and access requirements of the NPPF.

Flood Risk

- 6.35 The site lies entirely within Flood Zone 1, representing the lowest risk of river or tidal flooding, and is not susceptible to surface water flooding, with no history of localised flooding affecting the site or surrounding land. Any minor changes to land levels or hardstanding associated with the proposed pitches and access will be managed through standard drainage measures, with soft landscaping incorporated to promote infiltration and control runoff. In accordance with paragraphs 159–169 of the NPPF, the site is therefore suitable for development, posing minimal flood risk to occupiers or the surrounding area, and aligns with sustainable development principles.

Ecology

- 6.36 A preliminary ecological appraisal has been completed on the site which hasn't identified any protected species that couldn't ordinarily be dealt with by means of a planning condition or Biodiversity enhancement plan.
- 6.37 Given that the works are retrospective, Statutory BnG does not apply here.
- 6.38 However, the site does provide opportunity to provide on-site benefits such as Bird / Bat boxes where required.

Applicants Gypsy status

- 6.39 National Planning Guidance for Gypsy and Traveller developments are contained within Planning Policy for Traveller Sites' (PTS). This guidance came into force in December 2025 and amended the planning definition of 'gypsies and travellers' to exclude those who have ceased to travel permanently. This revised definition is as follows;

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

- 6.40 The definition still includes those who are of a nomadic habit of life who have ceased to travel temporarily because of their own, or their dependant's health or education needs or old age. This site will be occupied by the following persons who meet the above definition.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Very Special Circumstances

- 6.41 While we maintain that the site can reasonably be considered an exception to inappropriate development due to its classification as Grey Belt land and its limited contribution to the purposes of the Green Belt, it is appropriate to set out Very Special Circumstances (VSC) in any event. This ensures that the planning balance clearly demonstrates that any harm to the Green Belt is outweighed by other considerations, consistent with paragraph 148 of the NPPF.
- 6.42 The most compelling factor in this case is the demonstrable and persistent need for Gypsy and Traveller accommodation within the Borough. Recent evidence, appeal decisions, and the age of the last Gypsy and Traveller Accommodation Assessment (GTAA) confirm that the Council cannot demonstrate a five-year supply of deliverable sites. The scale of unmet need is substantial and likely understated, given the age of the evidence base. This shortfall represents a significant and ongoing demand for lawful, permanent pitches.

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- 6.43 The extent of the Borough within the Green Belt further constrains the availability of suitable land for Traveller sites. Approximately 77% of the Borough is designated as Green Belt, and as such, the identification of sites outside these constraints is extremely limited. In this context, windfall sites such as the application site are essential to meeting current and immediate need. Without such sites, the ability to provide lawful accommodation for Gypsy and Traveller families is severely restricted.
- 6.44 There has also been a clear and acknowledged failure in the local policy framework. The Core Strategy does not include a criteria-based policy for the assessment of Traveller sites, and the anticipated Site Allocations and Development Management Policies (SADMP) document, which would provide such a framework, has been repeatedly delayed. Appeal decisions have recognised this policy vacuum and the resulting reliance on windfall sites to meet urgent need.
- 6.45 In this context, the provision of four lawful pitches on the site delivers an immediate and tangible benefit, addressing both the unmet accommodation need and reducing pressures associated with unauthorised encampments. The site is well-contained, locally screened, and does not significantly harm the openness or visual character of the Green Belt. The benefits of meeting identified need, combined with the constrained land supply and the absence of a functional policy framework, clearly outweigh the limited and localised Green Belt impacts.
- 6.46 Accordingly, in the planning balance, Very Special Circumstances exist which justify the grant of planning permission. The proposal would make a meaningful contribution to meeting the housing needs of Gypsy and Traveller families within the Borough, in a sustainable, well-contained location, without undermining the purposes of the Green Belt.

7 Conclusion

- 7.1 This application seeks retrospective planning permission for the siting of four Gypsy and Traveller pitches, each comprising a static caravan, a touring caravan, and an amenity building, together with associated landscaping and access arrangements. While the site lies within the Green Belt, it is considered Grey Belt land, making a limited contribution to the purposes of the Green Belt. On this basis, the development can reasonably be regarded as an exception to inappropriate development.
- 7.2 In any event, the planning balance clearly demonstrates that Very Special Circumstances exist which outweigh any limited harm to the Green Belt. The most compelling consideration is the demonstrable and ongoing need for Gypsy and Traveller accommodation within the Borough. Evidence, including recent appeals and the outdated GTAA, confirms that the Council cannot currently demonstrate a five-year supply of deliverable sites, with the scale of unmet need being substantial and likely underestimated.
- 7.3 The constrained availability of land outside the Green Belt further reinforces the need for sites such as this. With approximately 77% of the Borough designated as Green Belt, suitable alternatives are extremely limited. Windfall sites, including the application site, are therefore essential to meet current and immediate accommodation requirements for Gypsy and Traveller families.
- 7.4 The policy framework further strengthens this case. The Core Strategy does not include a criteria-based policy for assessing Traveller sites, and the anticipated SADMP, which would provide such guidance, has been repeatedly delayed. Appeal decisions have recognised this policy gap, highlighting the necessity of considering windfall sites to address unmet need.
- 7.5 The development itself is well-contained, respects the character of the surrounding landscape, maintains residential amenity, and can be accommodated without causing material harm to the openness or visual qualities of the Green Belt. The site is in a sustainable location, providing lawful and settled accommodation, which reduces the need for long-distance travelling and pressures from unauthorised encampments.
- 7.6 In conclusion, when weighed in the planning balance, the benefits of providing much-needed lawful Gypsy and Traveller accommodation, combined with the constrained land supply and policy shortcomings, clearly outweigh the limited and localised Green Belt impact. Very Special Circumstances exist in this case, and planning permission should be granted.