



Delegated Report

Full Planning Application

Planning Application No: 20260373

Location: 43 Beechwood Drive Meopham Gravesend Kent

Description: Demolition of existing bungalow and erection of a self-build single storey dwelling.

Applicant: Mr Patrick Maughan

Site Visit Date: 16th February 2026

Submitted Documents/Plans

Planning Application Form;
Drawing No. T1343-01-000 – Site Location Plan;
Drawing No. T1343-01-001 – Existing Elevations;
Drawing No. T1343-01-002 – Proposed Elevations;
Drawing No. T1343-01-003 – Existing Block Plan;
Drawing No. T1343-01-004 – Proposed Block Plan;
Drawing No. T1343-01-005 – Existing Floor Plans;
Drawing No. T1343-01-006 – Proposed Floor Plans;
Design and Access Statement;
Planning Statement;
Ecological Supporting Statement; and
SuDs Details.

Relevant Planning History

Reference	Description	Decision	Decision Date
20251223	Demolition of existing bungalow, erection of replacement self build dwelling and erection of a detached double garage.	Application Refused	30.03.2026
20241045	Demolition of existing bungalow. Erection of detached replacement self build dwelling with rooms in the roof space, dormer to rear roof slope and two dormers to front rear slope. Erection of a detached double garage.	Application Refused	13.11.2025
20060784	Erection of detached replacement dwelling with rooms in the roofspace and a detached garage at the front.	Permitted	13.11.2006
19920400	Erection of a conservatory at the rear.	Permitted	13.08.1992
19581348	Erection of chalet for week-end and holiday use	Permitted	15.12.1958

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- C12 – Policy for Replacement Dwellings in the Countryside
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt land
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

KCC – Heritage Conservation

In this instance I suggest that no archaeological measures are required.

KCC – Biodiversity

KCC Biodiversity were consulted on this current application, however no comments have been received. The comments received on the previous application (App. Ref. 20251223) are still considered to be relevant and have been shown below:

Received 18.02.26 for Planning App 20251223:
ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. We advise that an Ecological Impact Assessment, including a preliminary roost assessment for bats, is required prior to determination of the planning application.

INSUFFICIENT ECOLOGY (ECIA NEEDED)

Insufficient ecological information has been submitted with this application. As a result of reviewing the data available to us and the information submitted with the planning application, we advise that further information is sought from the applicant with regards to the potential for ecological impacts to arise.

Habitats and features (including mixed scrub, log piles and established trees) are present on and around the site, indicating ecological value and the potential for protected species presence that must be taken account of in the planning decision. As such, an Ecological Impact Assessment (EcIA) should be undertaken by a suitably qualified ecologist.

The EcIA will need to include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Ecological Appraisal (PEA) and any necessary additional surveys undertaken;
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

The existing structure proposed for demolition has raised roof tiles/wooden panelling, damaged soffits as well as established trees adjacent to the site, so the potential for roosting bats cannot be ruled out. As these proposals may have the potential to adversely affect bats, we highlight the need for a Preliminary Roost Assessment (PRA) for bats to be carried out, as part of the EclA.

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA is sought prior to determination of the planning application. This is in accordance with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005 which states “it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”.

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 through 195 of the NPPF 2024, biodiversity should be maintained and enhanced through the planning system.

BIODIVERSITY NET GAIN

The applicant considers the proposals to be exempt from statutory biodiversity net gain under the self-build exemption. For this exemption to apply, the proposals must:

- consist of no more than 9 dwellings;
- on a site that has an area no larger than 0.5 hectares; and
- consist exclusively of dwellings that are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015

It is not within our remit to verify that the proposed dwelling(s) meets the definition of self-build or custom housebuilding as defined in the 2015 Act. The LPA should therefore ensure that the proposals meet the definition and that a mandatory 10% biodiversity net gain does not apply.

Government guidance on self-build and custom housebuilding indicates that “[in] considering whether a home is self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout ... Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer, are not considered to meet the definition of self-build and custom housing”.

A recent appeal decision indicates that a “suitably robust mechanism such as a planning obligation/legal agreement or other means” is necessary to properly secure a development as self-build and to prevent it reverting to an open market dwelling where a mandatory 10% biodiversity net gain would otherwise apply.

We note that the applicant, although exempt, has submitted a Small Sites Metric as part of this application. However, as this has been submitted in PDF format we are unable to verify and confirm that their results are correct but highlight the exemption above.

Future Considerations:

- Sensitive lighting plan
- Ecological enhancements

Officer Comment – an Ecological Supporting Statement was submitted with this new application which states that a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) will be

undertaken by a suitably qualified ecologist, however no actual Ecological Impact Assessment has been submitted in support of the application. This will be addressed the Ecology and Biodiversity section below.

Neighbouring properties

A site notice was displayed and individual letters sent to five surrounding properties with an overall expiry date of 22.05.26. No comments have been received.

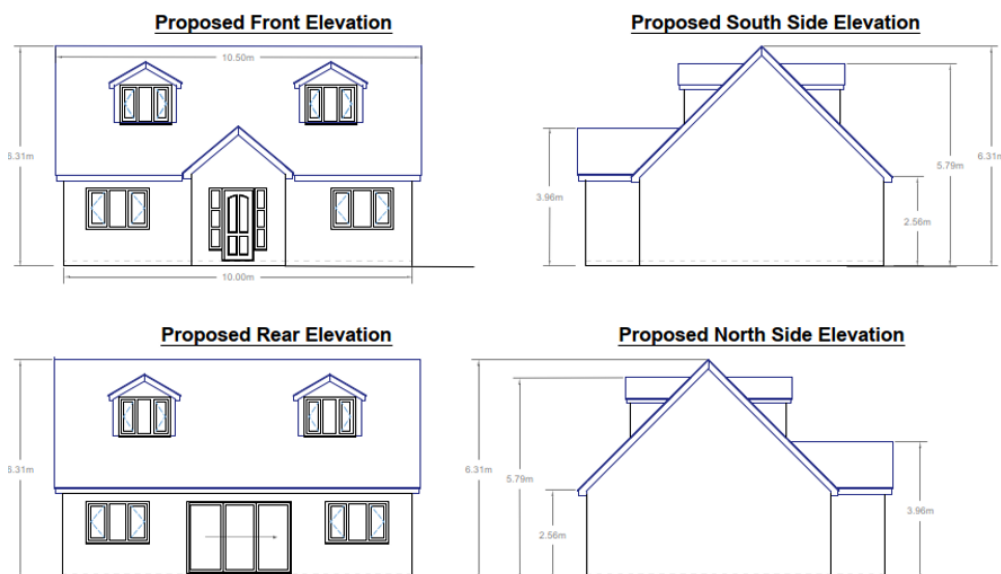
Officer's Analysis

Background

This application is a resubmission following two previously refused applications. The most recent being 20251223 for the *Demolition of existing bungalow, erection of replacement self build dwelling and erection of a detached double garage*. This application was refused for the following reasons:

1. This proposal would result in the construction of a new dwelling within the Green Belt. Such development is regarded as inappropriate development unless it meets any of the exceptions set out in paragraph 154 and satisfies all the criteria set out in paragraph 155 of the National Planning Policy Framework (2024). The development would not meet any of the exceptions set out in paragraph 154 and due to the unsustainable location of the site would not satisfy all the criteria set out in paragraph 155. In addition, the development would harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal is considered to constitute inappropriate development, contrary to the National Planning Policy Framework (2024) and Policy CS02 of the Gravesham Local Plan Core Strategy (2014).
2. The proposed dwelling would not be of a similar scale and mass to the existing dwelling. It would be larger than the existing dwelling and no case has been forwarded to demonstrate that the enlargement is "modest" and required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate to meet the special needs of the occupants. In addition, the site would not be in an appropriate location, well related to essential services. As such the proposal is contrary to Saved Policy C12 of the Gravesham Local Plan First Review (November 1994).
3. The application site is located within the Harvel Wooded Downs Landscape Character Area. This proposal would consolidate the sporadic built development within this locality which would erode the spacious, wooded character of the housing in this landscape area. The development would therefore fail to conserve, restore and enhance the overall landscape character and as such would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).
4. The application is not accompanied an Ecological Impact Assessment and contains insufficient information to demonstrate the presence or otherwise of protected species and the extent that they may be affected by the proposed development. As such the proposal would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

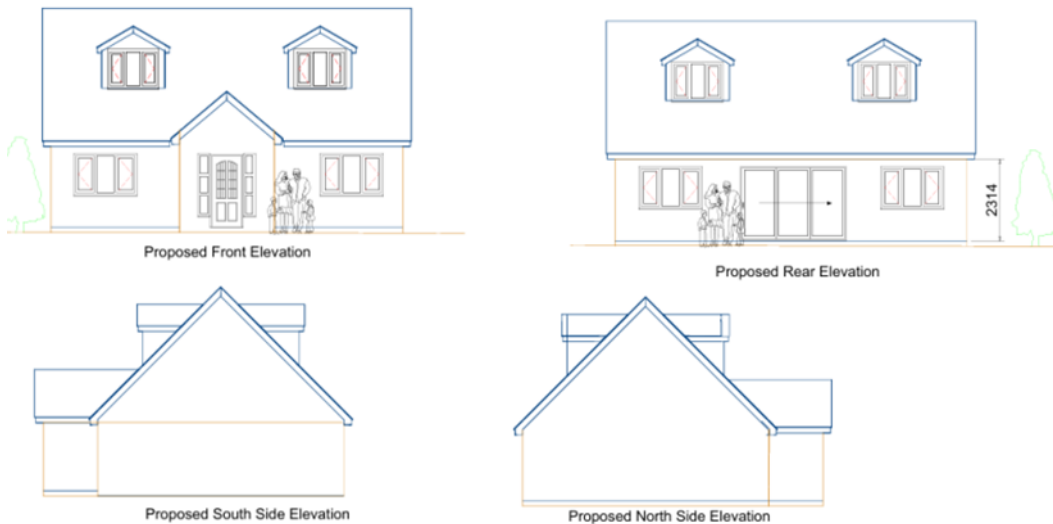
20251223 Proposed Plans



Prior to planning application 20251223, an application for the *Erection of detached replacement self build dwelling with rooms in the roof space, dormer to rear roof slope and two dormers to front rear slope. Erection of a detached double garage* (App. Ref. 20241045), was refused in November 2025 for the following reasons;

1. *This proposal would result in the construction of a new dwelling within the Green Belt. Such development is regarded as inappropriate development unless it meets any of the exceptions set out in paragraph 154 and satisfies all the criteria set out in paragraph 155 of the National Planning Policy Framework (2024). The development would not meet any of the exceptions set out in paragraph 154 and due to the unsustainable location of the site would not satisfy all the criteria set out in paragraph 155. In addition, the development would harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal is considered to constitute inappropriate development, contrary to the National Planning Policy Framework (2024) and Policy CS02 of the Gravesham Local Plan Core Strategy (2014).*
2. *The proposed dwelling would not be of a similar scale and mass to the existing dwelling. It would be larger than the existing dwelling and no case has been forwarded to demonstrate that the enlargement is "modest" and required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate to meet the special needs of the occupants. In addition, the site would not be in an appropriate location, well related to essential services. As such the proposal is contrary to Saved Policy C12 of the Gravesham Local Plan First Review (November 1994).*
3. *The application site is located within the Harvel Wooded Downs Landscape Character Area. This proposal would consolidate the sporadic built development within this locality which would erode the spacious, wooded character of the housing in this landscape area. The development would therefore fail to conserve, restore and enhance the overall landscape character and as such would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).*
4. *The application is not accompanied an Ecological Impact Assessment and contains insufficient information to demonstrate the presence or otherwise of protected species and the extent that they may be affected by the proposed development. As such the proposal would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).*

20241045 Proposed Plans



This current application seeks to overcome the two previous reasons for refusal.

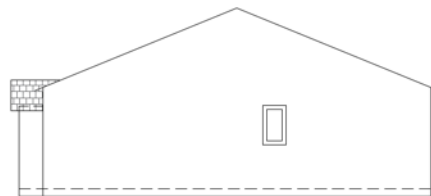
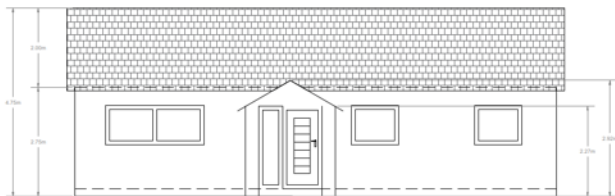
Proposal

The application is for the Demolition of existing bungalow, erection of replacement self build dwelling and erection of a detached double garage.

Proposed Elevations

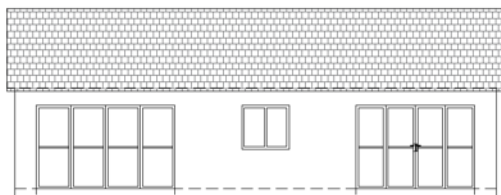
Proposed Front Elevation

Proposed North Side Elevation



Proposed Rear Elevation

Proposed South Side Elevation



The revised scheme has removed the first floor element, reducing the height of the building from 6.31m (from measurements from 20251223 scheme) to the ridge, to 4.75m, together with the removal of the detached garage. In addition, a preliminary ecological appraisal has been submitted to support the application, as per the comments request from KCC Biodiversity from the previous application.

The main planning considerations relating to this proposal are as follows:

- Is the proposed development appropriate in the Green Belt
- The effect of the proposal on the openness of the Green Belt.
- Saved Policy C12 of the Local Plan First Review
- Design and visual impact
- Impact on landscape

- Impact on residential amenity
- Highway issues
- Cycle and refuse storage
- Ecology and Biodiversity
- Very special circumstances

Is the proposed development appropriate in the Green Belt?

The application site lies within the Green Belt outside the village of Culverstone Green, a rural settlement inset from the Green Belt as identified on the Core Strategy Policies Map. The site falls within an area known as the Culverstone Valley Area. While this area has always been subject to Green Belt policy, up until 2014 development within the area was considered against a specific area policy, Policy C14 of the Gravesham Local Plan First Review. Policy C14 and the associated Supplementary Planning Guidance for the Culverstone Valley Area were withdrawn following the adoption of the Core Strategy in September 2014, on the recommendation of the Examination Inspector. From this point, development in this area has been considered against national and locally adopted Green Belt policy, in the same way as other areas within the Borough that lie in the Green Belt. Policy CS02 of the Core Strategy prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt as defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy.

National policies for protecting the Green Belt are set out in Section 13 of the NPPF. Paragraph 153 is particularly relevant in the consideration of planning applications within the Green Belt:

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 154 of the NPPF states that development in the Green Belt is inappropriate unless one of the listed exemptions applies. This is reproduced in full below:

Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- i) mineral extraction;*
- ii) engineering operations;*
- iii) local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- iv) the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- v) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
- vi) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

Those exemptions that could potentially be considered to apply to this proposal are discussed below:

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces

The following table provides a useful comparison between the existing and proposed dwellings:

	Floor Area (sq.m.)	Height	Footprint
Existing Dwelling	50.23	5.3	58.7
Proposed dwelling	106.37	4.75	129.96

These figures represent over 111% increase in floor area and over 121% increase in footprint.

The previous application (20251223) proposed a replacement dwelling with a gross internal floor area of 105sqm across the ground and first floors. This represented an approximately 110% increase in internal floor area and a 25% increase in the building footprint compared with the existing dwelling.

Although the current proposal omits the first-floor accommodation, the living space has instead been accommodated entirely at ground-floor level. As a result, the proposed internal floor area has increased slightly to 106.37sqm. More significantly, the building footprint has increased substantially from 74sqm under the previous scheme to 129.96sqm. This represents a significant increase over both the previously refused proposal and the existing dwelling and is considered unacceptable. Overall, the proposed development would result in an increase of approximately 111% in internal floor area and approximately 121% in footprint compared with the existing property.

The removal of the first-floor accommodation, the reduction in ridge height, and the omission of the detached garage have gone some way towards addressing the concerns raised in relation to the previous application. However, notwithstanding these amendments, the proposed replacement dwelling would still be more than twice the size of the existing property. Consequently, it cannot reasonably be regarded as "not materially larger" than the dwelling it would replace, as required by criterion (d) of paragraph 154 of the National Planning Policy Framework (2024). Accordingly, while the revisions have addressed some of the previous reasons for refusal, the scale and massing of the replacement dwelling remain unacceptable, and the proposal continues to conflict with the requirements of the Framework.

These figures clearly indicate that the size of the proposed dwelling would be materially larger than the dwelling to be replaced. As such the exemption at paragraph 154(d) of the NPPF would not be applicable.

In light of the above assessment it is considered that none of the listed exemptions set out in paragraph 154 of the NPPF are applicable to the current proposal and as such

would constitute inappropriate development in the Green Belt.

In accordance with paragraph 153 of the NPPF, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. A discussion as to whether a case of very special circumstances exists in relation to this development is set out later in this report.

The effect of the proposal on the openness of the Green Belt

Paragraph 142 of the NPPF refers to the open character of Green Belts:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Planning Practice Guidance on Green Belts states that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

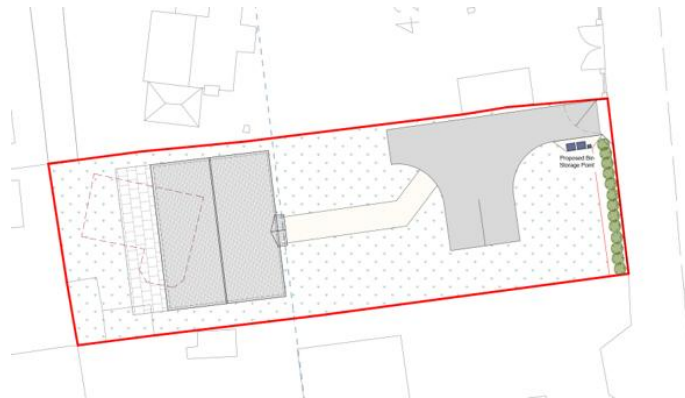
The existing dwelling is located towards the rear of the site in proximity to the western boundary. This is clearly shown on the existing block plan accompanying the application:



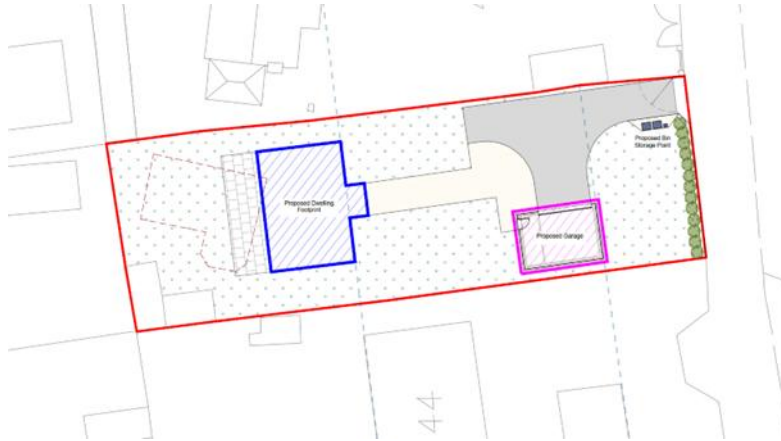
As such the majority of the site is undeveloped and open in character. This is evidenced from the following image:



This open character would be lost due to the siting of the proposed new property, increase in external footprint and large area of hardstanding provided towards the front of the site. This can be seen on the proposed block plan accompanying the application:



This is substantial increase over the previously refused scheme (20251223), as show in the following comparison block plan:



The siting of the proposal combined with the increase in the footprint of the property and associated hardstanding of the development would erode the open character of the site, resulting in substantial harm to the openness of the Green Belt. The negative effect on the openness of the Green Belt would conflict with the aims of Green Belt policy as set out in paragraph 142 of the NPPF (2024).

Saved Policy C12 of the Local Plan First Review

Saved Policy C12 of the Local Plan First Review relates to replacement dwellings in the countryside. It states that there will be a strong presumption against allowing the replacement of existing dwellings which will only be set aside if specified criteria are satisfied. These criteria are discussed below:

- i) This criterion requires the existing dwelling to be an “original dwelling” in permanent use as a dwelling. The proposal would meet this test.
- ii) This criterion requires that the existing dwelling must be in an appropriate location, meaning that it must be well related to existing roads and to essential services and must be in or close to an established rural settlement. For the reasons set out previously in this report, the site would not be in a sustainable location and would not be well related to essential services. As such, it would fail to meet criterion ii) of Saved Policy C12.
- iii) This criterion requires the replacement dwelling to be of a similar scale and mass to the existing dwelling and must be no larger than the existing dwelling unless it can be demonstrated that modest enlargement is required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate to meet the special needs of the occupants. As set out earlier in this report, the replacement dwelling would be larger than the existing. A footnote to this criterion states where a modest enlargement can be justified, it should not be greater than one third of the floorspace of the existing dwelling excluding garage(s) and outbuildings and the replacement of bungalows by dwellings of two or more storeys will be resisted.

As previously set out in this report, the proposal would be significantly larger than the existing dwelling. Furthermore, although a case for a modest enlargement has been cited in the supporting statement, the increase in the size of the floorspace would be greater than one third of that of the original dwelling. In these respects the proposal would fail to meet criterion iii) of Saved Policy C12.

- iv) This criterion states the layout of the replacement dwelling shall not be such as to facilitate its later subdivision. The proposed layout does not lend itself to subdivision and as such the proposal meets this test.
- v) This criterion requires that the replacement dwelling should normally occupy the same site as the existing dwelling. Given the siting of the existing dwelling towards the rear of the site, it is considered that the proposed siting could be justified as it would be more in-keeping with the siting of other dwellings within this locality.

- vi) This criterion requires that the existing or proposed means of access, including access for fire fighting appliances, must be satisfactory. It is considered that the proposal would provide satisfactory access.
- vii) This criterion requires that the existing or proposed site drainage and means of soil and waste disposal must be satisfactory. A drainage strategy has been submitted with the current proposal.

In light of the above considerations, this proposal would fail to meet criteria ii) and iii) of Saved Policy C12 of the Local Plan First Review.

Design and visual impact

Section 12 of the NPPF relates to “achieving well-designed places” and sets out the Government’s requirements in relation to design issues. Paragraph 131 is particularly relevant:

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.

The aims set out in paragraph 131 of the NPPF are reflected in Policy CS19 of the 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.”

Design for Gravesham (2024) expands on the Core Strategy, and Policy CS19 in particular, to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

Beechwood Drive is characterised by dwellings of differing architectural styles which tend to be located on spacious plots. In this context, there is no objection to the design of the proposed dwelling *per se*. There are examples in Beechwood Drive of other properties that are of a similar scale and design. Although only limited details of materials have been provided, these would need to be of a high quality and would need to complement those used on nearby properties.

It is important to note that although the design of the proposed dwelling is considered acceptable, this does not overcome the more fundamental concerns relating to Green Belt issues as set out above.

Impact on landscape

Section 15 of the NPPF highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Policy CS12 of Gravesham Local Plan Core Strategy states that the overall landscape character and valued landscapes within the Borough will be conserved, restored and enhanced and that proposals will take account of the Gravesham Landscape Character Assessment.

The site is located within the Harvel Wooded Downs Character Area. The key characteristics are defined in the Gravesham Landscape Character Assessment as follows:

- *Varied topography with steep valley sides and plateaux*
- *Ancient woodland, chestnut coppice and small paddocks and pasture*
- *Traditional historic settlement of Harvel set around village green*
- *Occasional traditional farmsteads*
- *Haphazard mosaic of residential plots and small holdings set within the woodland*

The Gravesham Landscape Character Assessment states that the strong landscape elements within the Harvel Wooded Downs should be conserved, whilst design standards should be defined to halt the erosion of the area with inappropriate development.

This area is characterised by a “haphazard mosaic of residential plots” which are enclosed by woodland. This proposal would further consolidate the sporadic built development within this locality which would erode the spacious, wooded character of the housing in this landscape area. It is considered that the proposal would therefore conflict with the characteristics of the Harvel Wooded Downs Character Area as identified in the Gravesham Landscape Character Assessment and would be contrary to Policy CS12 of the Core Strategy which seeks to conserve, restore and enhance the overall landscape character.

Impacts on residential amenity

Paragraph 135 of the NPPF requires planning decisions to, *inter alia*, provide “a high standard of amenity for existing and future users”. In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to “safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land”.

Privacy

The proposed dwelling would be unlikely to result in a loss of privacy to neighbouring occupiers. The main aspect of all the proposed windows is towards the front and rear of the property at ground floor level only. As these views would be towards the highway to the front and garden area to the rear, these windows would not result in window-to-window overlooking or the loss of privacy to neighbouring garden areas. No windows are proposed in the side elevations of the building.

Sunlight/daylight/outlook

The proposed dwelling would have similar front and rear building lines to the property to the south, no. 44 Beechwood Drive. Due to the siting and orientation of the new development in relation to this neighbouring property, there would be no significant loss of sunlight, daylight or outlook to the occupiers of this dwelling.

In addition, due to the orientation of the property to the north, no. 42 Beechwood Drive, and its separation distance from the proposed dwelling, together with the overall roof height, it is unlikely there would be a significant loss of sunlight, daylight or outlook to the occupiers of this neighbouring property.

External space standards

Paragraph 9 and table two of the Council’s Residential Layout Guidelines set out the Council’s requirements for private amenity space for new dwellings. For dwellings with three bedrooms it requires a minimum garden area of 60m² and a minimum depth from the rear wall of the house of 10.0m. The proposed dwelling would exceed the minimum requirements set out in the Council’s Residential Layout Guidelines.

Internal space standards

The “Technical housing standards – nationally described space standard” was published by the Department for Communities and Local Government in March 2015. This document sets out requirements for the gross internal area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key

parts of the home.

The proposed dwelling would comprise a single-storey, three bedroom, five person dwelling. The required minimum gross internal floor area for such units is 86m². The gross internal floor area of the proposed dwelling would measure 106.37sqm would significantly exceed this standard.

These standards also provide minimum requirements for the size of bedrooms, including the following:

- c. *in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide*
- d. *in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²*

All of the bedrooms would exceed the minimum standards for floor area and width.

Highway issues

Policy CS11 of the Core Strategy seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is provided in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. Saved Policy P3 of the Gravesham Local Plan First Review requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

The Kent County Council Vehicle Parking Standards require a maximum of two on-site parking spaces to serve a three bedroom dwelling. The proposed block plan indicates that this level of parking could be provided on site. As such it is considered that this proposal would be acceptable in terms of highway safety.

Cycle and refuse storage

The current Kent County Council Vehicle Parking Standards provide minimum cycle parking standards. For residential dwellings there is a requirement of one space per bedroom. Although the submitted drawings do not indicate any cycle storage facility, this could be secured through an appropriately worded planning condition if planning permission were to be granted.

Paragraph 32 of the Council's Residential Layout Guidelines (2020) relates to refuse storage and contains the following requirement:

Refuse containers shall be provided on a hardstanding and within purpose built enclosures, which are readily accessible for collection.

Again, the submitted drawings show an area for refuse but do not provide details of storage, although if permission were to be granted this could also be secured by a planning condition.

Biodiversity

Paragraph 180 of the NPPF (2024) relates to biodiversity and states that, *inter alia*, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Policy CS12 of the Core Strategy reflects this stance and requires there will be no net loss of biodiversity in the Borough.

Kent County Council Biodiversity was consulted on the application. Although no comments have been received in relation to the current submission, the consultee's response to the previous application remains relevant. Those comments advised that habitats and features within and surrounding the site, including mixed scrub, log piles and established trees, indicate ecological value and the potential presence of protected species. Accordingly, this ecological interest must be properly taken into account as part of the

planning assessment.

The previous consultation response advised that an Ecological Impact Assessment (EclA), prepared by a suitably qualified ecologist, should be submitted to assess the likely impacts of the proposed development. While the current application includes an Ecological Supporting Statement confirming that a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) will be undertaken by a suitably qualified ecologist, no Ecological Impact Assessment has been submitted in support of the application. In the absence of an EclA, the Local Planning Authority is unable to adequately assess the likely effects of the proposal on habitats and protected species or determine whether appropriate avoidance, mitigation or compensation measures are required. Consequently, insufficient ecological information has been provided to enable the application to be properly assessed, and this deficiency constitutes a further reason for refusal.

With respect to Biodiversity Net Gain the applicant has indicated that the proposed dwelling would be self-build. As such it would be exempt from statutory Biodiversity Net Gain.

Very special circumstances

As set out above, the proposal is considered to be inappropriate development in the Green Belt. In accordance with paragraph 153 of the NPPF such development “should not be approved except in very special circumstances”. It advises 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”.

A case of very special circumstances has not been submitted with the application. Furthermore, for the reasons set out above, it is considered that the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, would not be outweighed by other considerations.

Conclusion

In conclusion, although the current application represents a revised scheme, the amendments made are not considered sufficient to overcome the concerns identified in the previous refusal. Furthermore, no additional supporting information has been submitted to adequately address the outstanding reasons for refusal. Accordingly, the proposal has failed to overcome the previous reasons for refusal and remains unacceptable.

As such, it has been shown that this proposal constitutes inappropriate development within the Green Belt and would have a negative impact on the openness of the Green Belt. In the absence of a sufficiently strong case of very special circumstances this proposal must therefore be seen as contrary to existing Green Belt policy as set out in the NPPF and Policy CS02 of the Core Strategy.

In addition, the proposal fails to meet the criteria set out in Saved Policy C12 of the Gravesham Local Plan First Review. There are also concerns with respect to impact of the proposal on the landscape character of the Harvel Wooded Downs Character Area and the absence of an Ecological Impact Assessment

It is acknowledged that planning permission for a replacement dwelling was granted in 2006. However, this was never implemented and was allowed to lapse. Given the lack of a fallback position, this application has therefore been determined in the light of relevant existing planning policy, which for the reasons set out earlier in this report, have changed significantly since the previous permission was granted.

Recommendation:

Refuse planning permission for the following reasons:

1. This proposal would result in the construction of a new dwelling within the Green Belt. Such

development is regarded as inappropriate development unless it meets any of the exceptions set out in paragraph 154 of the National Planning Policy Framework (2024). The development would not accord with paragraph 154(d) of the National Planning Policy Framework (2024) and would not meet any of the other exceptions set out in paragraph 154. In addition, the development would harm the openness of the Green Belt. In the absence of any very special circumstances to clearly outweigh the harm to the Green Belt, the proposal is considered to constitute inappropriate development, contrary to the National Planning Policy Framework (2024) and Policy CS02 of the Gravesham Local Plan Core Strategy (2014).

2. The proposed dwelling would not be of a similar scale and mass to the existing dwelling. It would be larger than the existing dwelling and no case has been forwarded to demonstrate that the enlargement is “modest” and required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate to meet the special needs of the occupants. In addition, the site would not be in an appropriate location, well related to essential services. As such the proposal is contrary to Saved Policy C12 of the Gravesham Local Plan First Review (November 1994).
3. The application site is located within the Harvel Wooded Downs Landscape Character Area. This proposal would consolidate the sporadic built development within this locality which would erode the spacious, wooded character of the housing in this landscape area. The development would therefore fail to conserve, restore and enhance the overall landscape character and as such would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).
4. The application is not accompanied an Ecological Impact Assessment and contains insufficient information to demonstrate the presence or otherwise of protected species and the extent that they may be affected by the proposed development. As such the proposal would be contrary to the National Planning Policy Framework (2024) and Policy CS12 of the Gravesham Local Plan Core Strategy (2014).

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	A Cue	Signed:	<i>R Hart</i>
Dated:	27 th July 2026	Dated:	29th July 2026