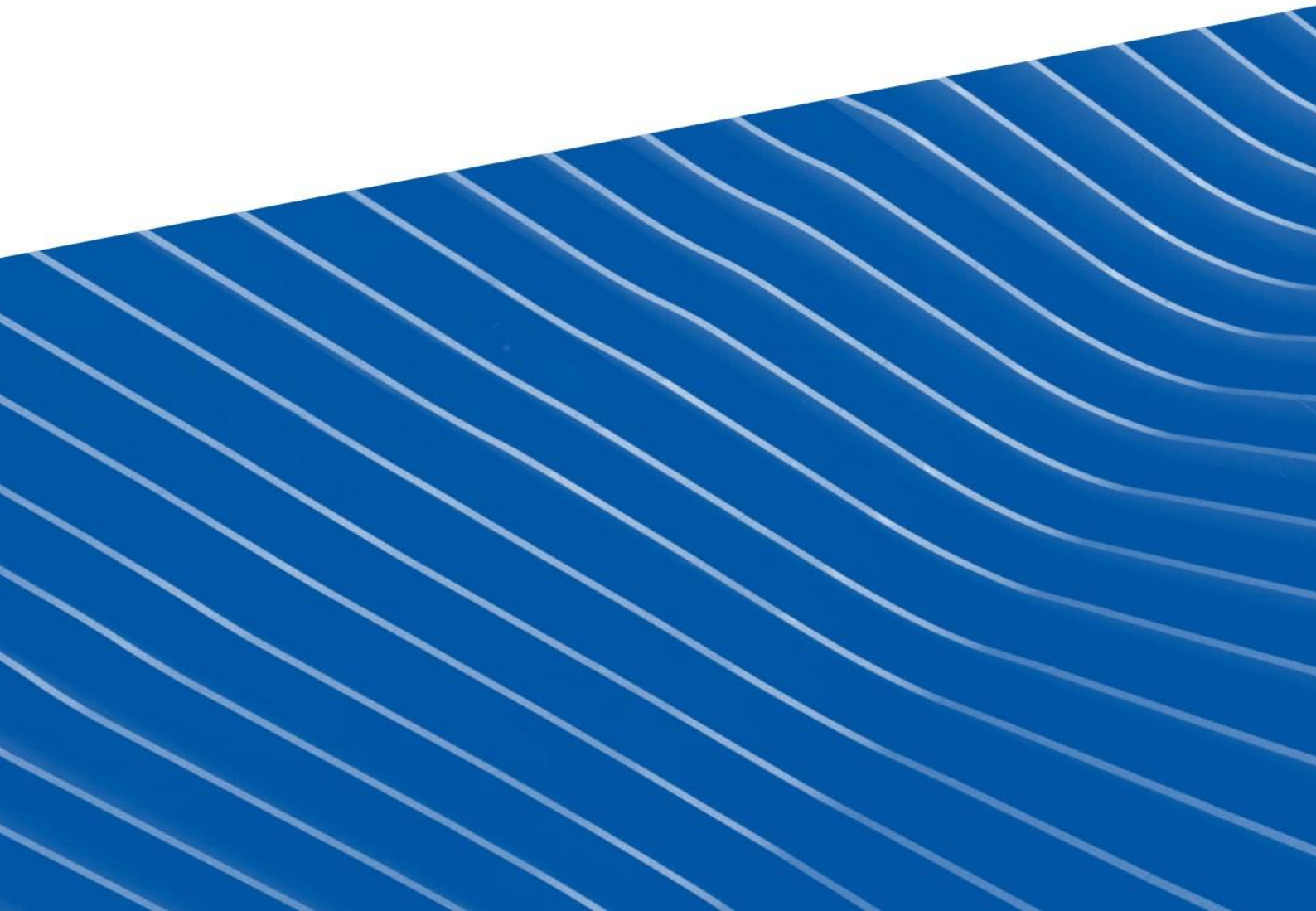


Planning Representation (Objection)

Land South of Bowesden Lane, Shorne, Gravesend

Council Reference: 20260757

September 2026



Prepared by:

Name [REDACTED]

Title: Planning Consultant (MRTPI)

Date: 9th September 2026

1 Introduction

This representation is submitted on behalf of the owner of [REDACTED] who strongly objects to application 20260757 for the erection of a substantial five-bedroom detached dwelling, garage and associated pool house on land south of Bowesden Lane, Shorne. The application site is an undeveloped plot within the Metropolitan Green Belt, outside the defined rural settlement of Shorne. The applicant also confirms that the site lies within a National Landscape.

The objection is not founded on a proposition that all development in the Green Belt is unacceptable. It addresses the current national policy tests on their own terms. In particular, the Council must determine the application against the National Planning Policy Framework published on 17 August 2026, which expressly replaced the December 2024 Framework relied upon throughout the submitted Planning Statement.

The proposal should be refused because the applicant has not demonstrated, on a robust site-specific basis, that this undeveloped parcel satisfies the current Green Belt route relied upon; the claimed sustainability of the location is overstated; the scheme would materially urbanise an undeveloped rural plot; and the proposal would cause harm to the character and special qualities of the protected landscape. The benefit is limited to a single market dwelling and does not justify the permanent transformation of this sensitive site.

The site also has an extensive planning history and the relevant planning applications are set out below:

- Council Ref. 20221156 - Erection of stable block and barn – Refused 29th March 2023
- Council Ref. 20210602 - Erection of new dwelling with associated landscaping, access and parking on land adjacent to Meadow Cottage – Refused 24th June 2021
- Council Ref. 20210007 - Erection of dwellinghouse and associated landscaping, access and parking provision on land adjoining Meadow Cottage – Refused 31st March 2021

2 The Development Plan and NPPF

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant adopted Gravesham policies include Core Strategy Policies CS01, CS02, CS12 and CS19, together with relevant saved policies and adopted design guidance.

Policy CS02 directs rural development towards rural settlements inset from the Green Belt. The Council's own settlement hierarchy evidence records Shorne and Shorne Ridgeway as inset settlements and states that development outside those settlements in the Green Belt is subject to Green Belt policy. Policy CS12 seeks to protect overall landscape character, while Policy CS19 requires development to be visually attractive, locally distinctive and to conserve and enhance the character of the local built and natural environment.

The national policy context has changed during the life of this application. The August 2026 NPPF is now the operative Framework. Its national decision-making policies are material

considerations of critical importance and must be read as a whole. The applicant's references to paragraph 155 of the December 2024 NPPF, paragraphs 110 and 115, and the former footnote 7 structure therefore cannot simply be carried forward as the applicable decision-making test.

3 Green Belt: 2026 Policy Test

Under Policy GB6 of the August 2026 NPPF, inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances; substantial weight is to be given to Green Belt harm, including harm to openness. Policy GB7 identifies categories which are not inappropriate.

The proposal is plainly not agriculture, forestry, a reuse or replacement of an existing building, affordable housing for local community needs, or redevelopment of previously developed land. Nor is the application site within the inset settlement. The applicant's case is therefore, in substance, dependent upon the grey-belt route now contained in Policy GB7(1)(g).

Policy GB7(1)(g) requires all of the following: (i) use of grey belt land without fundamentally undermining the purposes, taken together, of the remaining Green Belt across the plan area; (ii) an evidenced unmet need for the type of development proposed; (iii) a sustainable location, with particular reference to Policy TR3; and (iv), for major housing development, compliance with the Golden Rules. Although the Golden Rules do not apply to this single-dwelling proposal, the first three requirements remain cumulative.

4 Grey Belt Status (NPPF 2026)

The August 2026 NPPF defines grey belt as Green Belt land comprising previously developed land and/or other land which does not strongly contribute to any of Green Belt purposes (a), (b) or (d) in Policy GB2. The application site is not previously developed land. Its status therefore depends upon a proper assessment of the contribution made by this particular undeveloped parcel.

The submitted Design and Access Statement relies heavily on Gravesham's Stage 2 Green Belt Study and states that the site is immediately adjacent to parcel SR4, which is identified as having a 'moderate' harm rating. That is not the same thing as the application site itself having been assessed as grey belt. Indeed, the applicant's own wording confirms the distinction: the site is adjacent to the assessed parcel rather than demonstrably being the assessed parcel. It essentially lies outside of it.

This distinction matters even more under Annex E of the August 2026 NPPF. Annex E requires Green Belt assessment areas to be sufficiently small to reveal variations in contribution and expressly provides for subdivision into smaller assessment units where necessary. A broad conclusion concerning an adjacent strategic parcel cannot substitute for a site-specific assessment where the physical character, boundaries, enclosure and relationship with existing built form may differ.

The Council should therefore independently assess the red-line site against the current Annex E criteria rather than accept an inferred grey-belt classification derived from neighbouring land. The fact that an adjacent parcel was assessed as causing 'moderate' harm does not establish

that this site makes no strong contribution to any relevant Green Belt purpose, nor does it determine the acceptability of the development now proposed.

5 Openness and Countryside Encroachment

Even where development falls within a category that may be 'not inappropriate', its actual effects remain relevant to the wider planning balance, landscape policy and design policy. Here the change from the existing baseline would be substantial.

The submitted plans show not merely a dwelling but a sizeable residential compound: a large two-storey five-bedroom house, double garage, extensive driveway and turning area, swimming pool, pool house, domestic garden and associated landscaping. Permanent occupation would also introduce parked vehicles, lighting, refuse storage, deliveries, fencing, garden furniture and other domestic paraphernalia.

The proposal therefore entails both a spatial loss of openness and a marked perceptual change from undeveloped land to a clearly domesticated residential plot. Landscaping may filter views, but visual screening does not restore spatial openness and cannot undo the fundamental change in land character. A development does not cease to affect rural character merely because it is partly screened by vegetation.

The presence of existing dwellings in the wider vicinity does not convert the application site into residential land or extend the settlement boundary by implication. The correct baseline is the undeveloped site itself. Permitting a substantial new residential use here would consolidate sporadic ribbon development outside the inset settlement and contribute to incremental suburbanisation of the countryside.

6 The Starwood Appeal

The submitted Design and Access Statement places significant reliance on Appeal Decision APP/K2230/W/25/3370656, Starwood, Pear Tree Lane, Shorne, allowed on 6 January 2026. That decision is a material consideration, but it is not a precedent which determines this application.

Starwood concerned demolition of four stable buildings and two canopies, removal of two containers, a portacabin and hardstanding, and alterations/extension to an existing concrete-framed structure to form a three-bedroom bungalow. The appeal therefore involved a materially developed baseline and the removal/consolidation of existing structures and hard surfaces.

The present proposal is fundamentally different. It would introduce a substantial new two-storey five-bedroom house, garage, pool, pool house and extensive domestic infrastructure onto an undeveloped plot. The comparative effects on spatial openness, landscape character, domestication and settlement form are consequently different in kind and degree.

The Inspector's conclusions at Starwood were expressly site-specific, including findings about that site's existing development, its relationship with Pear Tree Lane, local facilities and transport options. Those conclusions cannot lawfully or logically be transposed merely because the application site lies in the same broad locality. The Council must undertake a fresh assessment of this site and this scheme.

7 National Landscape and Landscape Character

The applicant confirms that the application site falls within a National Landscape. This is a matter of substantial policy weight, not a secondary design consideration. Policy N4(1) of the August 2026 NPPF provides that development within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight is to be placed on conserving and enhancing natural beauty.

The Design and Access Statement's landscape case is largely that the plot is generous, surrounding vegetation provides a sylvan backdrop, and the building would not be prominent. That approach risks conflating limited visibility with absence of landscape harm. Landscape character is not confined to public visibility. It includes the physical pattern, rurality, tranquillity, undeveloped qualities and perceptual character of the land.

A large two-storey dwelling, garage, pool house, swimming pool, hardstanding and domestic curtilage would introduce a conspicuously suburban land use into an undeveloped rural plot. The scheme would materially alter the site's character irrespective of whether trees and hedges filter some views. Existing vegetation should not be treated as a screen behind which development can occur without consequence.

The proposal also relies upon the continued effectiveness of boundary vegetation over the lifetime of the development. Seasonal variation, disease, storm loss, management and future pressure for pruning or removal all reduce the certainty of that mitigation. The Council should assess the scheme on the basis of its built form and permanent land-use effects, not on an assumption of complete and perpetual screening.

Given the protected landscape designation, the absence of a proportionate and convincing assessment demonstrating how the proposal would conserve and enhance natural beauty should weigh heavily against permission. The applicant's assertion of 'no adverse impact' is not an adequate substitute for the policy exercise required by N4 and the statutory duty applicable to decision-makers in relation to National Landscapes.

8 Sustainability and Transport

The sustainability limb of the applicant's former paragraph 155 case must now be assessed with particular reference to Policy TR3. That policy seeks locations which support sustainable patterns of movement, enable good accessibility for different users and make the most of transport infrastructure. In rural areas, opportunities to improve walking, wheeling, cycling and public transport should be taken where they exist.

The submitted statement itself acknowledges that this section of Bowesden Lane is not served by a footpath. The applicant relies on the lane being quiet and on facilities and bus stops elsewhere in Shorne. That does not remove the practical issue that future occupiers must first travel along an unlit rural lane without dedicated pedestrian provision in order to access those services.

The Starwood Inspector's acceptance of sustainability at Pear Tree Lane does not establish that every site in the vicinity automatically satisfies TR3. Route quality, distance, traffic conditions,

gradients, lighting, accessibility for children, older people and disabled users, and the actual convenience of public transport are site-specific considerations.

The scale and nature of the proposed dwelling are also relevant. A five-bedroom family house with substantial on-site parking and a double garage is inherently capable of generating multiple household vehicle trips. The existence of theoretical alternatives does not by itself amount to a 'genuine choice' of modes if those alternatives are inconvenient or unattractive in practice. The Council should therefore scrutinise the accessibility evidence rather than treating proximity to the edge of Shorne as determinative.

9 Housing Need

It is accepted that Gravesham Borough Council's housing supply position is a material consideration and may establish an evidenced unmet housing need for the purposes of Policy GB7(1)(g)(ii). That does not, however, determine the application.

The relevant question is the weight to be attached to the benefit of one additional market dwelling when balanced against the site-specific environmental and spatial harms. The proposal would make only a negligible quantitative contribution to the Borough's overall shortfall. There is no evidence before the Council that this particular five-bedroom dwelling would address an identified specialist, affordable or local housing need.

The housing shortfall should therefore attract positive weight, but it should not be treated as a licence for unrestricted development of undeveloped Green Belt land. Policy GB7 deliberately retains cumulative requirements concerning grey-belt status, the remaining Green Belt and sustainable location. The existence of unmet need does not dispense with those tests or with Policy N4, landscape, character and design considerations.

10 Design, Scale and Pattern of Development

The proposal is substantial in scale. Its broad frontage, two-storey massing, projecting elements and extensive roof form, combined with the garage and pool house, create a considerable quantum of built development. The fact that individual nearby properties may also be large does not demonstrate that a new dwelling of this scale is appropriate on an undeveloped plot outside the settlement.

The appropriate character assessment must distinguish between the established built form within the inset settlement and the looser, sporadic development beyond it. Gravesham has itself described nearby development outside the inset settlement as sporadic ribbon development comprising large, detached dwellings in substantial plots, materially different from the more closely grained built-up frontage.

The proposal would fill an undeveloped plot with a permanent residential dwelling and thereby extend the built form outside of the settlement boundary. That is a material change to the rural edge and should be assessed against CS12, CS19, the Council's design guidance and current national design and landscape policies.

11 Ecology, Trees and Biodiversity

The Preliminary Ecological Appraisal reportedly identifies potential use of the site by bats, dormice and badgers and recommends precautionary mitigation and/or further survey work. The Council should ensure that all necessary ecological information is available before determination where protected species may be affected, rather than deferring matters which are necessary to establish whether the principle or layout is acceptable.

The submitted Statement states that the red-line site is approximately 0.19 hectares and is exempt from mandatory Biodiversity Net Gain. Government guidance changed on 6 August 2026 and now exempts applications on sites no larger than 0.2 hectares, provided the relevant conditions are met, including in relation to priority habitat. The Council should verify the measured red-line area and confirm that no onsite priority habitat is affected before accepting the exemption.

Irrespective of the statutory BNG exemption, the exemption does not remove the need to assess ecological effects or the requirements of development plan and national policies concerning biodiversity, protected species, trees and habitat. The proposed ecological enhancements should therefore be treated as mitigation/enhancement measures, not as a reason to discount the loss of the site's existing undeveloped character.

12 Planning Balance

The principal benefit is the delivery of one additional dwelling in a borough with an acknowledged housing shortfall. There would also be temporary construction expenditure and the ordinary economic benefits associated with occupation. Those benefits merit weight, but they are modest.

Against those benefits, the proposal would permanently transform an undeveloped Green Belt plot into an extensive residential use; introduce a substantial two-storey house and multiple ancillary built and hard-surfaced elements; consolidate sporadic development outside the inset settlement; erode rural character; and create a significant degree of domestication within a National Landscape. There are also unresolved questions concerning the robustness of the grey-belt assessment, the transferability of the Starwood appeal conclusions, sustainable accessibility and ecological effects.

Even if the Council ultimately concludes that the land is grey belt and that Policy GB7(1)(g) is engaged, that is not the end of the decision. The August 2026 NPPF requires national decision-making policies to be read as a whole. The proposal must still satisfy the Protected Landscape, design, transport, ecology and other relevant policies. On the evidence submitted, the adverse effects substantially outweigh the limited benefit of one additional market dwelling.

13 Conclusion

For the reasons above, the Council is respectfully requested to refuse planning permission.

In particular, the Council should not accept the applicant's grey-belt case by extrapolation from adjacent parcel SR4 or the materially different Starwood appeal. It should undertake its own site-

specific assessment under the August 2026 NPPF and Annex E, assess sustainability against Policy TR3, and give substantial weight to the conservation and enhancement of the National Landscape under Policy N4.

If the Council is nevertheless minded to approve the application, the officer report should expressly identify: (1) the evidence establishing that the red-line site itself is grey belt under the current definition; (2) why development of this particular site would not fundamentally undermine the remaining Green Belt; (3) how Policy TR3 is satisfied notwithstanding the absence of a footway on this part of Bowesden Lane; (4) how the proposal conserves and enhances the National Landscape; and (5) why the limited benefit of one dwelling outweighs the identified landscape, character and spatial effects.