

Planning Statement



PLANNING APPLICATION
BY

Mr & Mrs Green

RELATING TO

Demolition of all existing stables
buildings and maneges.
Redevelopment of site to provide
6 dwellings and carport
outbuilding

AT

Land West of
Rockley House
Wrotham Road
Culverstone
Kent
DA13 0QN

OUR REF: PH/21/240

01689 836334
enquiries@replanning.co.uk
www.replanning.co.uk

Robinson Escott Planning LLP,
Downe House, 303 High Street, Orpington, Kent BR6 0NN

1. INTRODUCTION

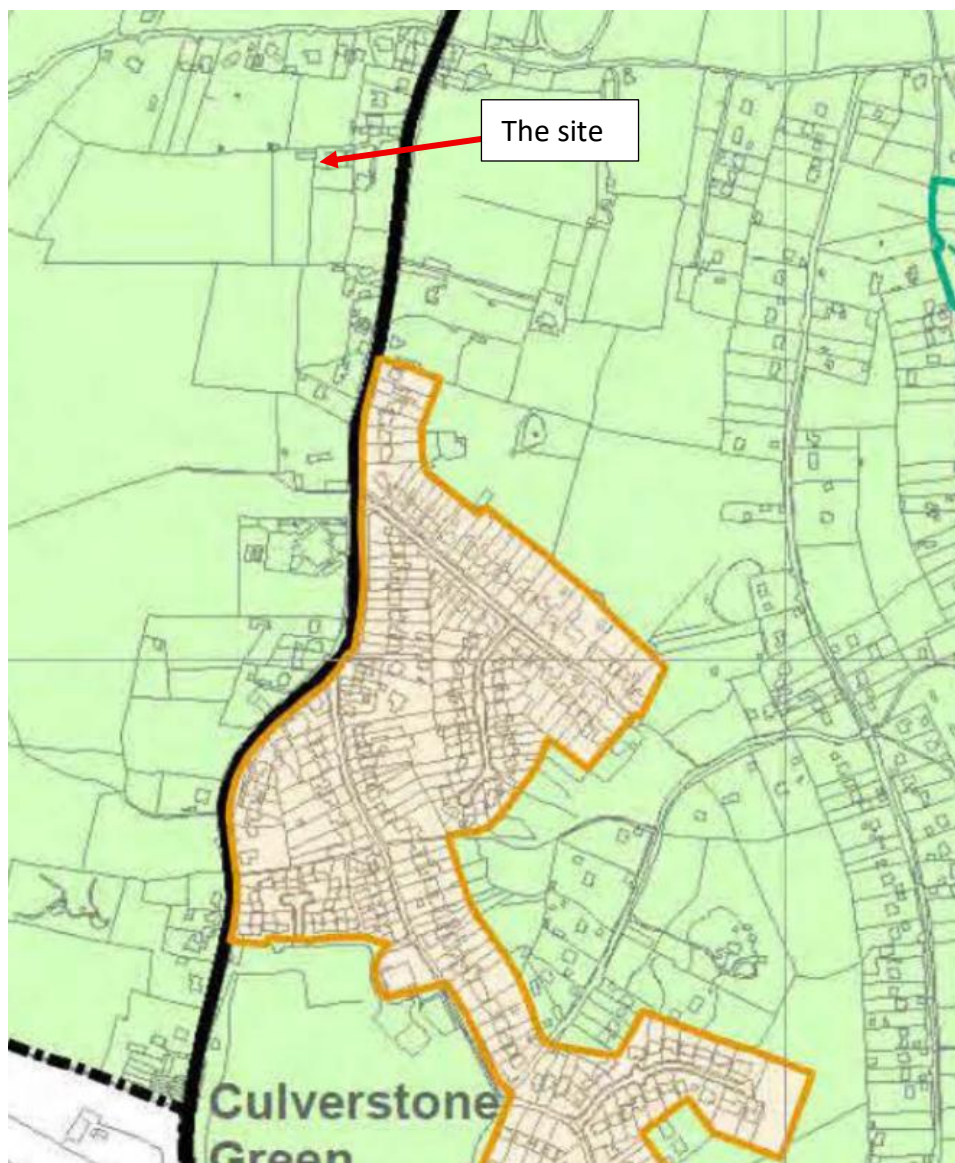
- 1.1. We have been instructed by Mr & Mrs Green to provide a Planning Statement and to prepare and submit an application for full planning permission for the redevelopment of an existing stables buildings and maneges to provide six dwellings with associated landscaping and parking utilising an existing vehicular access on land to the west of Rockley House, Wrotham Road, Culverstone, Kent, DA13 0QN.
- 1.2. The application has been prepared acknowledging the site's location on the edge of the village of Culverstone Green which is positioned directly to the south, along with the site's location within the confines of the Green Belt as confirmed by the Gravesham Local Plan Core Strategy Policies Map (September 2014).
- 1.3. The application has therefore been prepared taking into consideration the most up to date Green Belt policy that is contained within the National Planning Policy Framework (December 2024) (NPPF). The design also considers relevant national planning practice guidance, the National Design Guide and the Development Plan. This comprises the Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014), the Gravesham Local Plan First Review (saved and deleted policies version) (September 2014) and Supplementary Guidance 2 'Residential Layout Guidelines' (amended June 2020).
- 1.4. This statement sets out how the redevelopment of the site complies with the most up to date Green Belt policy contained within the NPPF with it comprising the appropriate redevelopment of previously developed land in accordance with paragraph 154(g) of the NPPF and the appropriate redevelopment of 'Grey Belt' land having regard to the terms of paragraph 155 of the NPPF to be read in conjunction with paragraphs 110, 115 and 143 of the NPPF.

1.5. This statement is accompanied by the following supportive documents to enable the application to be registered and assessed by the local planning authority:

- A full set of existing and proposed architectural plans – OSP Architecture
- Design and Access Statement – OSP Architecture
- Highways Technical Note – Motion Transport Consultants
- Arboricultural report including tree survey plan and tree protection plan – Sylvanarb Arboricultural Consultants
- Preliminary Ecological Appraisal – The Ecology Partnership
- Biodiversity Net Gain Report and BNG metric – The Ecology Partnership

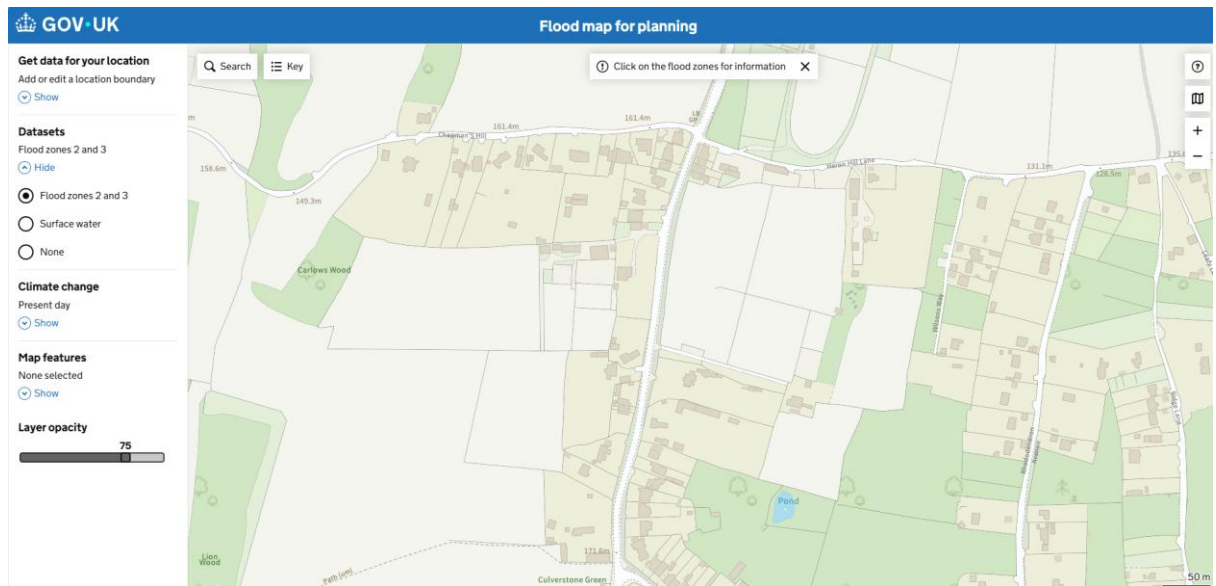
2. THE APPLICATION SITE AND SURROUNDING AREA

- 2.1. The application site comprises land to the west of a detached dwelling of two storey design known as Rockley House. The site is 0.37 hectares in size.
- 2.2. Rockley House is situated 0.1 miles outside the settlement confines of Culverstone Green which is positioned immediately to the south and accessible along the A227 Wrotham Road with a pedestrian footpath running along the eastern side of the highway to both the north and south of the application site.
- 2.3. The site comprises five existing buildings spanning across the northern section of the site the lawful use of which is for the stabling of horses (equestrian). The southern section of the site comprises two substantial sand schools associated with the existing equestrian use.
- 2.4. The site is served by an existing vehicular access on to the A227 Wrotham Road which also serves Rockley House.
- 2.5. The southern and western boundaries of the site consist of a post and rail fence with the northern boundary lined with trees and landscaping.
- 2.6. In terms of the character and appearance of the surrounding area, this is mainly residential with a grouping of residential properties built to a reasonably high density surrounding the junction of the A227 (South Street) at its junctions with Heron Hill and Chapmans Hill.
- 2.7. As confirmed within the introduction to this statement, the site is located within the confines of the Green Belt but is not affected by any other restricted policy designations as confirmed on the below extract from the Council's Local Plan Proposals Map which also details the location of the site relative to the village boundary of Culverstone Green:

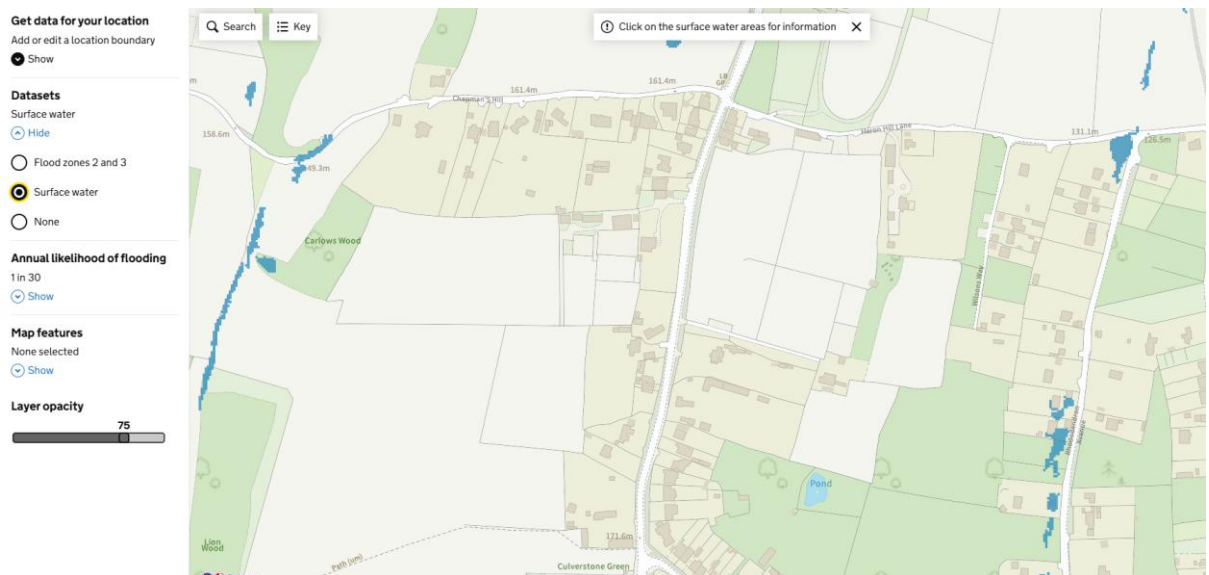


Extract from Local Plan Proposals Map showing location of site and village boundary of Culverstone Green.

- 2.8. The Environment Agency Maps confirms that the site is not in an area of flood risk from rivers of the sea and is not at risk of surface water flooding as detailed below:



Site not in area of Flood Risk from Rivers or the sea



Site not as risk of surface water flooding

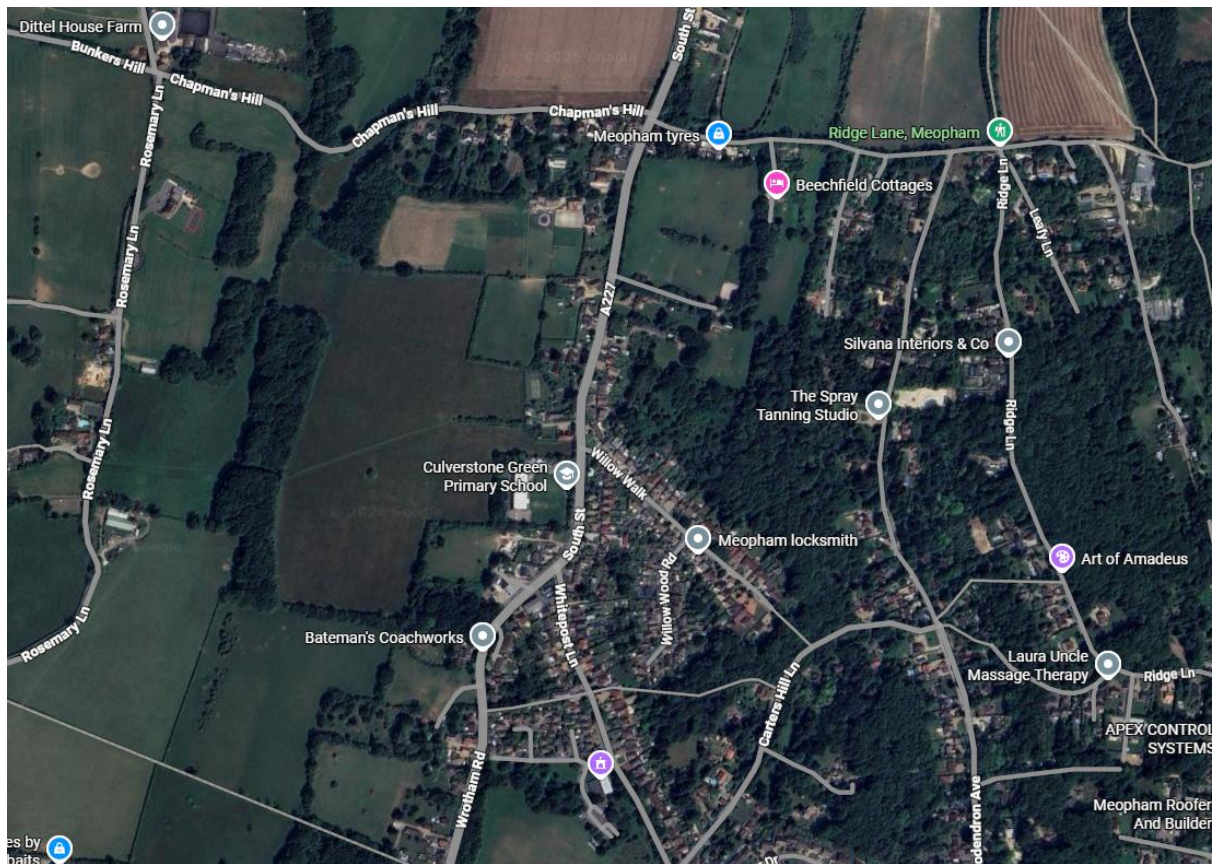
- 2.9. The below aerial map details the site and its proximity to the centre of Culverstone Green to the south with Google Maps confirming that the site is positioned 0.2 miles to Culverstone Green Primary School and a 0.4 mile walk to the village shop and post office and the petrol station.



Costcutter convenience store and post office and Texaco Petrol Station, Culverstone Green



Culverstone Green Primary School and nursery



0.2 mile (five min walk) to Culverstone Green Primary School

0.4 mile walk (nine min walk) to village Costcutter and post office (convenience store) and Texaco Petrol Station

- 2.10. The accompanying Highways Technical Note provided by Motion Transport Consultants details the site's level of accessibility to shops, local services and public transport.
- 2.11. This confirms there is a footway with street lighting provided on the western side of the A227 Wrotham Road with the footway varying in width between 1.2 – 1.8m providing a pedestrian connection towards the existing bus stops on Wrotham Road and to the village to the south.



View looking south with site entrance on right hand side of image and footpath into village on left hand side of image.

- 2.12. The Highways Technical Note details that there is no dedicated on road cycle lanes within the immediate vicinity of the site but that the local highway network is deemed suitable for cyclists given the low-speed limit (30mph) and the relatively flat topography of the area.
- 2.13. In terms of accessibility by bus, the closest bus stops are located on South Street (A227) and are approximately 120m to the north of the site. There is also a bus stop located a short walk away to the south of the site within the village Culverstone Green.
- 2.14. The local bus services provide access to the nearest railway station which comprises Meopham Railway Station approximately 4km to the north of the site, the accompanying highways note details all available bus services and rail services.

- 2.15. The site also has good access to major roads in light of its proximity to the M20, M2 and M25 motorways.
- 2.16. It is reasonable to conclude that site is positioned in a sustainable and accessible location within walking distance of shops, local services and the village primary school.

3. THE PROPOSAL

- 3.1. The application seeks full planning permission for the demolition of all existing stables buildings along with the removal of the two sand school/menage areas and for the site to be redeveloped to provide 6 new family homes (with a density of 16 dwellings per hectare). The density of development strikes a balance between making an efficient use of the land whilst having regard to the residential character and setting of the surrounding area.
- 3.2. The development would be served by the existing vehicular access would enable two detached houses of four-bedroom design to be provided along with a row of four terraced properties of three-bedroom design.
- 3.3. The detached houses would be served by their own driveways along with parking for three vehicles. The terraced dwellings would be served by a detached car barn with two parking spaces provided for each house.
- 3.4. The architectural plans confirm that each three-bedroom, five-person terraced house would be 98.7^{m²} in size and both detached dwellings would have an internal floor area of 149.3^{m²} and would be of four-bedroom, seven-person design.
- 3.5. The site layout plan and accompanying Design and Access Statement demonstrate that the existing developed area of the site is some 2559^{m²} and the proposed development area would be 1353^{m²} representing a 47% reduction in developed area. The site layout plan details that the layout incorporates a green buffer between Plots 1 and 2 and the existing dwelling at Rockley House along with a communal meadow to the rear of the terraced houses. This results in 53% of the site being regenerated to provide green space.
- 3.6. In footprint terms, the existing buildings on the site to be removed have a total footprint of 564^{m²} and the footprint of the proposed houses is 419^{m²} representing a reduction of 26%.

- 3.7. In terms of architectural design, the proposed dwellings are of a traditional form responding to the brickwork and materials used in the construction of Rockley House with the traditional design reflecting the character and appearance of dwellings within the locality.
- 3.8. The site plan demonstrates that each dwelling would be served by its own secure bin and cycle storage and all gardens would be of appropriate proportions and length for family use.

4. RELEVANT PLANNING POLICY CONSIDERATIONS

- 4.1. The most up to date Green Belt policy is set out within the latest version of the NPPF which was adopted in December 2024. The adopted development plan for Gravesham includes Green Belt protection policies which pre-date the most recent NPPF and the government's planning practice guidance document. Most weight in decision making on Green Belt grounds is now being afforded to the December 2024 version of the NPPF.

National Planning Policy Framework (December 2024)

- 4.2. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development with the thrust of national policy seeking to increase housing supply across the country. Paragraph 11(d) states that where there are no relevant development plan policies, or the policies which are most important for determining an application are out of date, planning permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development as proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. A development plan will be judged to be out of date where a local planning authority is unable to demonstrate a deliverable five-year housing land supply which is the case in the borough of Gravesham.
- 4.3. Section 5 '*delivering a sufficient supply of homes*' recognises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are essential for small and medium sized enterprise house builders to deliver new homes and are often built out relatively quickly.
- 4.4. In terms of rural housing, the guidance states that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs and to promote sustainable development in rural areas, housing should be located where it will enhance and maintain the vitality of rural communities.

- 4.5. Section 11 '*the effective use of land*' paragraph 125(c) advises that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs and that Council's should promote and support the development of underutilised land and buildings to meet identified needs for housing.
- 4.6. Section 12 '*achieving well designed places*' requires all new development to be of a high quality of architectural design whilst retaining important trees and landscaping.
- 4.7. Green Belt policy is set out in Section 13 of NPPF with the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open.
- 4.8. Paragraph 143 details that the Green Belt serves five purposes:
- a. To check the unrestricted sprawl of large built-up areas.
 - b. To prevent neighbouring towns merging into one another.
 - c. To assist in safeguarding the countryside from encroachment.
 - d. To preserve the setting and special character of historic towns.
 - e. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 4.9. Paragraph 154 sets out what forms of new development within the Green Belt will be acceptable and this includes paragraph 154(g) which states that 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 will be deemed to be acceptable.

- 4.10. The annex to the framework contains a definition of previously developed land as detailed below with it recognised that stables and equestrian buildings comprise previously developed land within the Green Belt.

Previously developed land

Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

- 4.11. Paragraph 155 introduces new guidance relating to ‘grey belt’ land which is defined in Annex 2:

Grey belt

For the purposes of plan-making and decision-making, ‘grey belt’ 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. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

- 4.12. Footnote 7 contained on page 6 of the NPPF sets out that the assets include sites of special scientific significance, local green space, a national landscape, a national park, heritage assets, an area defined as heritage coast, irreplaceable habitats, assets of archaeological interest and areas at risk of flooding or coastal change. The application site is not located within any of these restrictive areas.

4.13. Paragraph 155 specifies that the development homes, commercial and other development within the Green Belt should also not be regarded as inappropriate where:

- a. The development would utilise 'Grey Belt' land that would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (see paragraph 143).
- b. There is a demonstrable unmet need for the type of development proposed.
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF.
- d. Where applicable, development is required to meet the 'golden rules' and requirements set out in paragraphs 156 and 157. The golden rules do however only apply to major development and with this application proposing six dwellings on a site of less than 0.5 hectares in size, it is not necessary to demonstrate compliance with 'the golden rules'.

4.14. The NPPF also defines that 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than the Green Belt) contained within the NPPF would provide a strong reason for refusing or restricting development.

Planning Practice Guidance – Advice on the role of the Green Belt in the planning system (February 2025)

4.15. The guidance specifies that when making judgements as to whether land is 'grey belt', local planning authorities should consider the contribution that a site makes to the Green Belt against purposes a, b and d of paragraph 143 of the NPPF. Considerations for informing these judgements are set out below:

Purpose A – to check the unrestricted sprawl of large built up areas

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Contribution Illustrative features

Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features:
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Contribution Illustrative features

	- be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures,

Contribution	Illustrative Features
	natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

- 4.16. The PPG sets out that after consideration of the above criteria, a site that is not judged to strongly contribute to any one of purposes a, b or d can be identified as Grey Belt land.

This is subject however to whether the area listed in footnote 7 of the NPPF is applicable which is not relevant in this case.

4.17. The Council is also required to consider whether:

- The site strongly contributes to the Green Belt purposes a, b or d.
- Whether the application policies to areas of particular importance identified in footnote 7 provide a strong reason to restrict the development.
- Whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy guidance.

4.18. Where a site is identified as grey belt land, planning applications still require an assessment as to whether the development proposal would not be inappropriate development within the Green Belt including consideration of if the site is sustainably located and whether it would meet the ‘golden rules’ where major development is proposed (not applicable in this case).

Gravesham Local Plan Core Strategy (September 2014)

4.19. Policy CS01 ‘*sustainable development*’ states that planning applications that accord with policies within the development plan for Gravesham will be approved without delay and that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF.

4.20. CS01 also recognises that where there are no policies relevant to the application or where relevant policies are out of date (including where there is a deficiency of housing supply) at the time of making the decision, then the Council will grant the permission unless other material considerations indicate otherwise.

4.21. The Core Strategy sets out the settlement hierarchy for the borough with Culverstone Green defined as a third-tier settlement.

4.22. Paragraph 4.2.6 acknowledges that within the rural area, the Council has identified 13 rural settlements inset from the Green Belt and defined on the Policies Map and this includes Culverstone Green. The Council does however recognise that these boundaries do not define the full extent of each settlement but relate to a coherent and established built up area where infilling would not adversely affect local character and identity or impact on the openness of the Green Belt.

4.2.6 Within the rural area, the Council has identified 13 rural settlements inset from the Green Belt and defined on the Policies Map. These boundaries do not define the full extent of each settlement but relate to a coherent and established built up area where infilling would not adversely affect local character and identity, or impact on the openness of the Green Belt.

4.23. Policy CS02 focuses on the scale and distribution of development and acknowledges that within rural areas development will be supported within those rural settlements. Whilst this recognises the extent of the Green Belt is to be maintained, the most up to date guidance concerning appropriate development within the Green Belt as contained within the NPPF (December 2024) no takes precedent.

4.24. Policy CS11 '*transport*' requires sufficient parking in new development to be provided in accordance with the Council's adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

4.25. Policy CS12 concerns green infrastructure with this stating that there will be no net loss of biodiversity within the borough and opportunities to enhance, restore, recreate and maintain habitats will be sought. The policy also specifies that where a negative impact on any protected or priority habitats cannot be avoided, compensatory measures will be required either elsewhere on the site or off site.

- 4.26. Policy CS14 concerns housing type and size with the Council expecting new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and any evidence of local need to create sustainable and balanced communities.
- 4.27. Policy CS15 focuses on housing density acknowledging that sites will be developed at a variety of densities dependant on their location and accessibility to public transport. All new housing will be expected to be developed to the density that is consistent with achieving good design whilst not compromising the distinctive character of the area in which it is situated. With a rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare, but this will need to be balanced with having regard to other material policy considerations along with the character and appearance of each individual site.
- 4.28. With regard to affordable housing provision, Policy CS16 acknowledges that affordable housing will only be required on schemes of 15 dwellings or more on sites of 0.5 hectares or more in urban areas and within the rural area where three units or more are proposed on sites of 0.1 hectares or more. This policy is however at odds with that contained within the latest version of the NPPF with this specifying that affordable housing should not be sought for residential developments that are ‘not major developments’ other than in designated rural areas, the application site is not located within a ‘designated rural area’.
- 4.29. The affordable housing policies contained within the NPPF are consistent with the Council’s affordable housing policy set out in its emerging Local Plan (Regulation 19 consultation document) which acknowledges that affordable housing provision will only be required on ‘major’ residential applications (10 dwellings or more, or on sites greater than 0.5 hectares in size).
- 4.30. Policy CS19 ‘*development and design principles*’ encourages new development to achieve sustainable living and choice through a mix of compatible uses that are well

connected to places that people want to use including the public transport network, local services and community facilities. New development must be located, designed and constructed to safeguard the amenity including privacy, daylight and sunlight of its occupants and those of neighbouring properties and the design and layout of new residential development is required to accord with the Council's adopted residential layout guidelines.

- 4.31. In accordance with the terms of this policy, new development will be designed in an inclusive way to be accessible to all members of the community and provide appropriate levels of private and public amenity space. Car parking is expected to relate to the development it serves, and new development is also required to incorporate appropriate facilities for the storage of recycling and waste.

Gravesham Local Plan 1st review (saved policies) – September 2014

- 4.32. Green Belt policy contained within the local plan has all been deleted with this now acknowledged to be superseded by the most up to date guidance contained within the NPPF (December 2024).
- 4.33. Policy LT6 specifies that proposals for new housing development will be expected to make provision for open space and place space appropriate to the scale of the development and type of housing proposed, having regard to the provision of and proximity to existing open space in the locality.
- 4.34. In terms of transport policies, Policy T1 acknowledges that local planning and highway authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will seek to ensure that all proposed developments are adequately served by the highway network identified on the proposals map.

- 4.35. Policy T4 states that the local planning authority would not normally permit any proposed development outside the confines of the built-up area that generates significant vehicular or pedestrian traffic.
- 4.36. Policy P3 requires for new development to accord with the Kent County vehicle parking standards as interpreted by Gravesham Borough Council.

Supplementary Planning Guidance – residential layout guidelines (June 2020)

- 4.37. The Council’s guidance sets out the minimum internal space standards for dwellings and individual room sizes in table 1 and also confirms the minimum required garden area and garden depth for new dwellings between one and four bedrooms in size with this set out below:

Table 1

Function of room	Floorspace sq.m
Double bedroom	11.2
Single bedroom	6.5
Living room	13.2
Dining room	9.5
Kitchen	7.2
Kitchen/diner	12.0
Lounge/diner	18.0
Bathroom and WC	3.6
Bathroom only	2.8
WC only	1.3

- 6 External access should be provided to the rear garden of a house. This standard will be deemed to be satisfied where access is available through a garage without entering the house. In addition, a way through the house from front to back, avoiding habitable rooms, should also be provided.
- 7 Direct access should be provided to a public highway or to a non-adoptable road, designed to the satisfaction of the Borough Council’s Engineering Services Manager.

Table 2

Accommodation with :	Minimum garden area (sq. metres)	Minimum depth from rear wall of house (metres)
1-2 bedrooms	37.2	7.6
3 bedrooms	60.0	10.0
4 or more bedrooms	100.0	10.0

- 4.38. The size of private amenity space and garden areas should be regarded as a minimum in order to allow the provision of adequate outside storage, leisure use, clothes drying and place space.
- 4.39. In terms of privacy, distances and overshadowing, paragraph 17 specifies that where windows of habitable rooms face each other, a window-to-window distance of at least 21m should be provided and a minimum distance of 21m shall be sought to be achieved between the windows of habitable rooms and the private garden area of dwelling. A private garden area is defined as the first 5.0m of garden adjacent to the rear of the dwelling.
- 4.40. The guidance states that all dwellings should be afforded an acceptable degree of natural lighting and that all habitable windows should be afforded an acceptable degree of outlook. All dwellings should be provided with sufficient refuse storage and that new residential developments should incorporate play space/open space.

Gravesham 5 Year Land Supply Statement (2024 -29)

- 4.41. This document confirms that the Council's position in terms of housing supply as of February 2025 is that the local authority is unable to demonstrate a five-year supply of housing moving forward with Gravesham having a three-year supply at present. It is therefore unable to demonstrate a five-year supply of housing moving forward. This means there is a defined need for housing provision within the borough and the tilted balance of paragraph 11 of the NPPF is therefore triggered.

Nationally Described Space Standards

- 4.42. The Nationally Described Space Standards can be read in conjunction with the Council's own residential standards for new homes.

4.43. The Nationally Described Space Standards require for the following living standards to be achieved:

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

4.44. In terms of bedroom sizes, single bedrooms are required to be at least 7.5^{m²} in size and double bedrooms are required to be at least 11^{m²}.

5. PLANNING ASSESSMENT AND CONCLUSIONS

5.1. Taking into consideration the site's location and relevant planning policy and guidance referenced above, the main issues to be assessed in this case are as follows:

- The Green Belt
- Standard of design
- Dwelling mix
- Residential amenity
- Highways and parking
- Trees and landscaping
- Ecology and Biodiversity Net Gain

Green Belt

5.2. The starting point for the preparation of the design of the development proposed by this application has been the consideration of the site's location within the Green Belt. The most up to date policy in this regard is contained within the latest version of the National Planning Policy Framework (December 2024) which includes a shift in Green Belt policy with it now permitting limited infilling or the partial or complete redevelopment of previously developed land to not cause '**substantial**' harm to the openness of the Green Belt. Since its adoption, case law has established that there is a 'high bar' in determining whether substantial harm would be caused by new development.

5.3. In addition, the latest version of the NPPF includes the adoption of '*grey belt land*' where the development of homes can be concluded to be grey belt also represents an appropriate form of development.

- 5.4. The creation of six dwellings in this location involving the demolition or removal of existing stables/equestrian buildings along with the existing sand school complies with both paragraph 154(g) ‘the redevelopment of previously developed land’ and also represents the appropriate development of ‘grey belt’ land as evidenced below:

Previously developed land

- 5.5. It is reasonable to conclude that the existing site which comprises five existing stable buildings spanning across the northern section of the site along with two substantial horse menages on the southern section of the site comprises previously developed land in accordance with the annex of the NPPF. It is accepted that stables/equestrian buildings and associated facilities comprise previously developed land within the Green Belt with this view is supported by case law and appeal decisions.
- 5.6. An example of a case study allowed on appeal on 15th April 2025 (APP/P0240/W/24/3350233) where planning permission was granted for the redevelopment of an existing single storey stables building/hardstanding and a menage to enable three dwellings to be provided Grange Stud Farm, Flitwick Road, Ampthill, Central Bedfordshire can be seen at **APPENDIX 1** of this Statement.
- 5.7. As can be seen in paragraphs 6, 7 and 8 of the appeal decision, the Inspector was satisfied that the stables, an access track and an existing menage comprised previously developed land.
- 5.8. With the site comprising previously developed land at Rockley House, it is necessary to demonstrate that ‘substantial harm’ would not be caused to the openness of the Green Belt through the provision of the six dwellings as proposed and the car barn to serve the proposed terraced houses.

- 5.9. The Council will note that paragraph 154(g) now involves the previous requirement to ‘*not have a greater impact on the openness of the Green Belt than the existing development*’ as been removed from this paragraph. This has now been replaced with a requirement of new developments to ‘*not cause substantial harm*’.
- 5.10. As confirmed within the accompanying Design and Access Statement the area of the existing site that is developed at present amasses some 2,559^{m²} and the area where houses are proposed by this application takes up 1,353^{m²} of the site. This represents a 47% reduction in developed area with 53% of the site regenerated to provide green space assisted through the removal of the two menages.
- 5.11. In footprint terms, existing buildings on the site have a footprint of 564^{m²} and the footprint of proposed houses would be 419^{m²} which represents a reduction of 26%.
- 5.12. It is acknowledged that the highest existing building on site at present which has a substantial footprint is 6.55m. The highest dwellings proposed by this application would be 9m high. Although built form would be of greater height, the degree of harm caused in this regard would not be ‘substantial’ and it is therefore reasonable to conclude that development complies with paragraph 154(g) of the NPPF.
- 5.13. It can therefore be reasonably concluded that the application represents the appropriate redevelopment of previously developed land that would not cause substantial harm to openness.
- 5.14. This conclusion is also supported by the decision attached at **APPENDIX 1** at Grange Stud Farm, Ampthill. The Council will note that in paragraphs 10-19 of that appeal decision, the Inspector acknowledged the scheme for housing involved a reduction in overall footprint and land covered by buildings but also detailed the existing stables that were low range and fairly diminutive structures with shallow pitched roofs and a low ridge height would be replaced by two storey dwellings. The Inspector accepted the height and bulk of the proposed houses would be notably increased. However, in allowing the appeal they

concluded that the increase in height and bulk of the development proposed would not cause 'substantial harm' to the Green Belt. It is reasonable for the same conclusion to be reached in relation to the development herewith proposed on land to the west of Rockley House.

Grey Belt

- 5.15. In addition to complying with paragraph 154(g) of the NPPF as detailed above, the application also represents the appropriate development of 'grey belt' land set out below:
- 5.16. It is acknowledged that paragraph 155 requires development of grey belt land to not undermine the purposes of the remaining Green Belt with regard to the five purposes outlined in paragraph 143 of the NPPF.
- 5.17. The creation of six dwellings on the site would comply with points a – e of paragraph 143 of the NPPF as detailed below:

a) To check the unrestricted sprawl of large built-up areas

The application site is not located within close proximity to a large built-up area with it positioned immediately to the north of the village settlement confines of Culverstone Green. It would not therefore result in the sprawl of large built-up areas.

b) To prevent neighbouring towns merging into one another.

Once again, this requirement relates to towns. In accordance with the NPPG, it is not relevant to an application involving development on the edge of a village. The proposal would not result in villages merging into one another.

c) To assist in safeguarding the countryside from encroachment.

As the Council will appreciate, the proposal would not involve the development of open land with all proposed dwellings confined to the location of the existing stables buildings to be removed along with associated paraphernalia including the existing maneges. Development would not therefore unacceptably encroach on the open

character of the countryside and the area surrounding the application site to the north, to the east and to the south is predominantly of residential character.

d) To preserve the setting and special character of historic towns.

The application site is positioned away from historic towns and heritage assets.

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The application will involve the efficient reuse of an existing developed site and the creation of six dwellings as proposed would make a small but important contribution to the Council's current housing deficiency. The proposed development would not preclude urban regeneration and the recycling of derelict land elsewhere within the Borough.

- 5.18. In accordance with paragraph 155(b) it is necessary to demonstrate that there is a demonstrable unmet need for the type of development proposed. This Statement confirms that Gravesham Borough Council is unable to demonstrate a five-year supply of housing at present with the local authority only achieving a three-year housing supply. There is therefore an acknowledged deficiency in terms of housing supply and a demonstrable unmet need for new homes therefore exists.
- 5.19. In accordance with paragraph 155(c) of the NPPF, it is necessary to demonstrate that development is in a sustainable location with particular references to paragraphs 110 – 115 of the Framework.
- 5.20. The accompanying Transport Statement and the contents of this planning submission demonstrate that this site is within easy walking distance of the village confines of Culverstone Green to the south. There is a pedestrian footpath on the eastern side of the A227 that links the site directly with the village with Culverstone Green Primary School positioned 0.2 miles to the south (a five-minute walk). In addition, the site is within walking

distance of local services including the village Costcutter and Post Office and the Texaco Petrol Station are both within 0.4 miles of the site (a nine-minute walk).

- 5.21. The accompanying Transport Statement confirms that bus services serve the A227 with the nearest bus stop positioned 120m north of the site and with a bus stop also located in close proximity to the site on the edge of the built confines of Culverstone Green to the south.
- 5.22. The Transport Statement confirms that all dwellings would be provided with secure cycle storage and although there are no dedicated on-road cycle lanes, the local highway network is deemed suitable for cyclists given the low-speed limit (30mph) and the relatively flat topography of the area. Meopham Railway Station is a 12 minute cycle away from the site with this providing services to central London and north Kent.
- 5.23. It is therefore reasonable to conclude the site is in an appropriately sustainable location compliant with paragraph 155(c) of the NPPF. It is not necessary to demonstrate that the application passes the tests of the Golden Rule requirements set out in paragraphs 156 to 157 of the NPPF as the proposal is not a 'major' application.
- 5.24. Taking these factors into account, it is reasonable to conclude that the site comprises 'grey belt' land and its redevelopment is also therefore appropriate in this regard.

Standard of Design

- 5.25. The proposed floor plans that accompany this application confirm that the three-bedroom, five-person terraced dwellings will be 98.7^{m²} in size in terms of their internal layout which exceeds the national standard of 93^{m²}. Both proposed detached houses are of four-bedrooms, seven-person design having a gross internal area of 149.3^{m²}. These also exceed the national standard of 115^{m²}.

- 5.26. The Council's residential layout standards have also guided the layout as proposed with the gardens serving the three-bedroom terraced homes exceeding 60^{m²} and the garden serving the detached houses exceeding 100^{m²}. The garden depths are also appropriate. The gardens to serve the houses would be suitable for family use and the proposed plans confirm that each house would be served by its own dedicated bin and cycle storage.
- 5.27. All habitable rooms will be afforded an acceptable degree of outlook and natural light. In terms of room sizes, these exceed the standards set out within the Council's residential layout guidelines.
- 5.28. As detailed within the accompanying Design & Access Statement, the proposed houses are of traditional form, reflecting the residential character of the surrounding area and the materials used in the construction of existing dwellings, notably Rockley House itself.
- 5.29. The architectural design that has been employed and the standard of design is therefore appropriate and policy/guidance compliant.

Dwelling mix

- 5.30. The application proposes a mixture of dwelling sizes with the terraced houses to be provided being of three-bedroom design and the detached houses to be of four-bedroom design.
- 5.31. This represents an appropriate dwelling mix having regard to the character and appearance of the surrounding area which mostly comprises family homes.

Residential Amenity

- 5.32. The layout to the development takes into consideration the privacy distances prescribed by the Council's residential layout guidance. A distance of 21m is retained between the front elevation of the proposed row of terraced houses and the rear elevation of Plot 1

along with the first 5.0m of its private rear garden in order to ensure that no unacceptable overlooking occurs.

- 5.33. The layout of Plot 2 has been specifically designed at first floor level ensuring no habitable window are located on the northern (rear) elevation at first floor level in order to ensure that the garden of Plot 1 is not overlooked by Plot 2. In addition, the site is located away from surrounding residential properties ensuring that no unacceptable overlooking will be caused to surrounding homes and the development is also positioned away from Rockley House to the east and would preserve the residential amenities of this adjacent property.
- 5.34. It is acknowledged that a soon to be completed dwelling is positioned to the north of the access driveway currently serving the stable site and which would serve the proposed development.
- 5.35. The vehicular use of this driveway associated with the six dwellings that are proposed would not cause unreasonable disturbance to this dwelling, with the access at present used by the existing equestrian use.
- 5.36. The application therefore complies with all relevant planning policy which seeks to protect the residential amenity of both the existing properties and those proposed by new development.

Highways and Parking

- 5.37. The accompanying Highways Technical Note provided by Motion Transport Consultants details the site's accessibility to shops and local services that is further documented within this submission.
- 5.38. The Highways Technical Note demonstrates that the development proposals benefit from appropriate access, parking and delivery and servicing arrangements with the note

incorporating a detailed swept path analysis. Refuse and service vehicles will be able to fully access the site.

5.39. Car and cycle parking are provided in accordance with the Council's standards, and the Highways Technical Note demonstrates that the proposals would result in an imperceptible impact on the local highway network during the morning and evening peak hours as well as over the course of an average weekday.

5.40. It can therefore be concluded that there are no reasons as to why the development proposals should be resisted on traffic or transportation grounds.

Trees and Landscaping

5.41. The application is accompanied by a comprehensive Arboricultural Statement provided by Sylvanarb.

5.42. This confirms that no existing trees would require removal with the development designed around all arboricultural constraints presented on site.

5.43. The Arboricultural Statement confirms that the existing treeline that runs along the northern perimeter of the site which mostly incorporates trees located outside the site area are to be retained and would be protected during construction works in accordance with BS5837.

Ecology and Biodiversity Net Gain

5.44. The application is accompanied by a Preliminary Ecological Appraisal provided by The Ecology Partnership. This concludes that no harm to any protected species would be caused by the proposed development and that no additional survey work is required. Therefore, subject to a suitable planning condition concerning the provision of a sensitive

lighting scheme and precautionary construction measures and the application is acceptable from an ecological perspective.

- 5.45. The application is also accompanied by a Biodiversity Net Gain Statement demonstrating that Biodiversity Net Gain can be enhanced on site within the communal meadow to be introduced and the green buffer area as shown.
- 5.46. The application would therefore both substantially enhance green space on with 53% of the site to comprise green space. The development would therefore achieve the requisite biodiversity enhancements.

6. CONCLUSIONS

- 6.1. The application would involve the appropriate redevelopment of previously developed land within the Green Belt and also comprises the appropriate redevelopment of 'grey belt' land as evidenced within this submission. There can therefore be no objection in principle to the residential development that is proposed.
- 6.2. The introduction of six family dwellings in this location would make an important contribution towards the Council's current housing deficit with paragraph 11 of the NPPF triggered in light of the current housing deficiency that is experienced within the Borough.
- 6.3. The layout of the development accords with the Council's adopted residential layout guidance ensuring that the development would not cause harm to the amenities of surrounding properties and that all dwellings proposed would be afforded an acceptable level of privacy and amenity.
- 6.4. The standard of design is fully compliant with the Nationally Described Space Standards and the Council's Residential Layout Guidance, and all proposed family homes would be served by generous gardens with bin/cycle storage and parking provided in accordance with the Council's adopted standards.
- 6.5. The architectural design that has been employed responds to the character and appearance of the surrounding area and the materials used in the construction of Rockley House. The traditional palette of materials would sit comfortably with the character of the site's edge of village location.
- 6.6. The site is positioned in a sustainable location with good access to the centre of the village of Culverstone Green by foot along with local shops and services within the village. It is also positioned within close proximity to bus stops positioned along the A227.

- 6.7. The introduction of six dwellings to be served by parking in accordance with the Council's adopted standards will not give rise to unacceptable impacts in terms of highway or pedestrian safety.
- 6.8. The development would retain all important trees along the northern boundary of the site and adjacent to the existing access and these would be protected during the construction of the dwellings in accordance with the recommendations set out within the accompanying Arboricultural Statement.
- 6.9. No harm would be caused to any protected species and Biodiversity Net Gain would be achieved as required.
- 6.10. Taking these material considerations into account, the application complies with the terms of all relevant planning policy and guidance, and it is therefore requested for full planning permission to be granted.

APPENDIX 1 – Appeal Decision re: Grange Stud Farm