

Delegated Report

Planning Application

Planning Application No: 20250521

Location: Clanna, Dean Lane, Meopham, Gravesend DA13 0BS

Description: Part Retrospective application for 1no mobile home, 1no touring mobile, 1no dayroom, hardstanding, fencing and associated soft landscaping.

Applicant: D Tuppett

Site Visit Date: 1 July 2025

Submitted Documents/Plans

Application form
Planning Statement
SUDS details
Lighting details
Fencing details
Dayroom details
BNG exemption details
Drawing no. T1249-003 (proposed block plan)
Drawing no. T1249-002 (existing block plan)
Drawing no. T1264-001 (site location plan)
Drawing no. T1264-004 (layouts and elevations)
Drawing no. DS1219 (cesspool tank)

Relevant Planning History

None

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS17 – Provision of Traveller Sites
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- T4 – Development outside the Built-Up Area
- T5 – Access to the Identified Highway Network

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 15 – Conserving and enhancing the natural environment

Planning Policy for Traveller Sites (PPTS), December 2024 Ministry of Housing, Communities and Local Government

The Planning Policy for Traveller Sites (PPTS) sets out the Government's planning policy for traveller sites. It applies to those Travellers who meet the planning definition set out in annex 1 of the 2024 PPTS, as follows:

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

The 2024 PPTS updated the 2023 planning definition of Gypsies and Travellers to embrace all persons "with a cultural tradition of nomadism or of living in a caravan". In addition the guidance contained in paragraph 2 of the 2023 PPTS Glossary on the considerations to take into account in determining whether an applicant is a gypsy or traveller and meets the planning definition, has been removed. The result of these changes is to acknowledge and ensure that the planning system considers and addresses the needs of all types of travellers.

As with the 2023 PPTS, the government's aim through the 2024 PPTS is to ensure that local planning authorities make their own assessment of need for Traveller sites, and, working collaboratively, prepare fair and effective strategies for addressing that need through the identification and delivery of sites over a reasonable timescale. The government is seeking to increase the number of traveller sites in appropriate locations to improve under provision and enable this community to access education, health and welfare services and employment as is the case with the general population, while having regard to protecting local amenity and local environment. The key paragraphs of the guidance relevant to this proposal are as follows:

Policy B – Planning for Traveller sites

Policy C - Sites in rural areas and the countryside

Policy E – Traveller sites in the Green Belt

Policy H – Determining planning applications for Traveller sites

Supplementary Planning Guidance

- SPG4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code SPD (2024)
- Gravesham Landscape Character Assessment (2009)
- Gravesham Landscape Capacity and Sensitivity Study (2020)
- National Landscape Management Plan (2021-2026)
- Gypsy and Traveller Accommodation Assessment (GTAA) Final Report (2018)
- Gypsy and Traveller Five Year Land Supply Statement

Consultations, Publicity and Representations

Neighbouring properties

The application has been advertised by site notice and individual letters to three neighbouring properties.

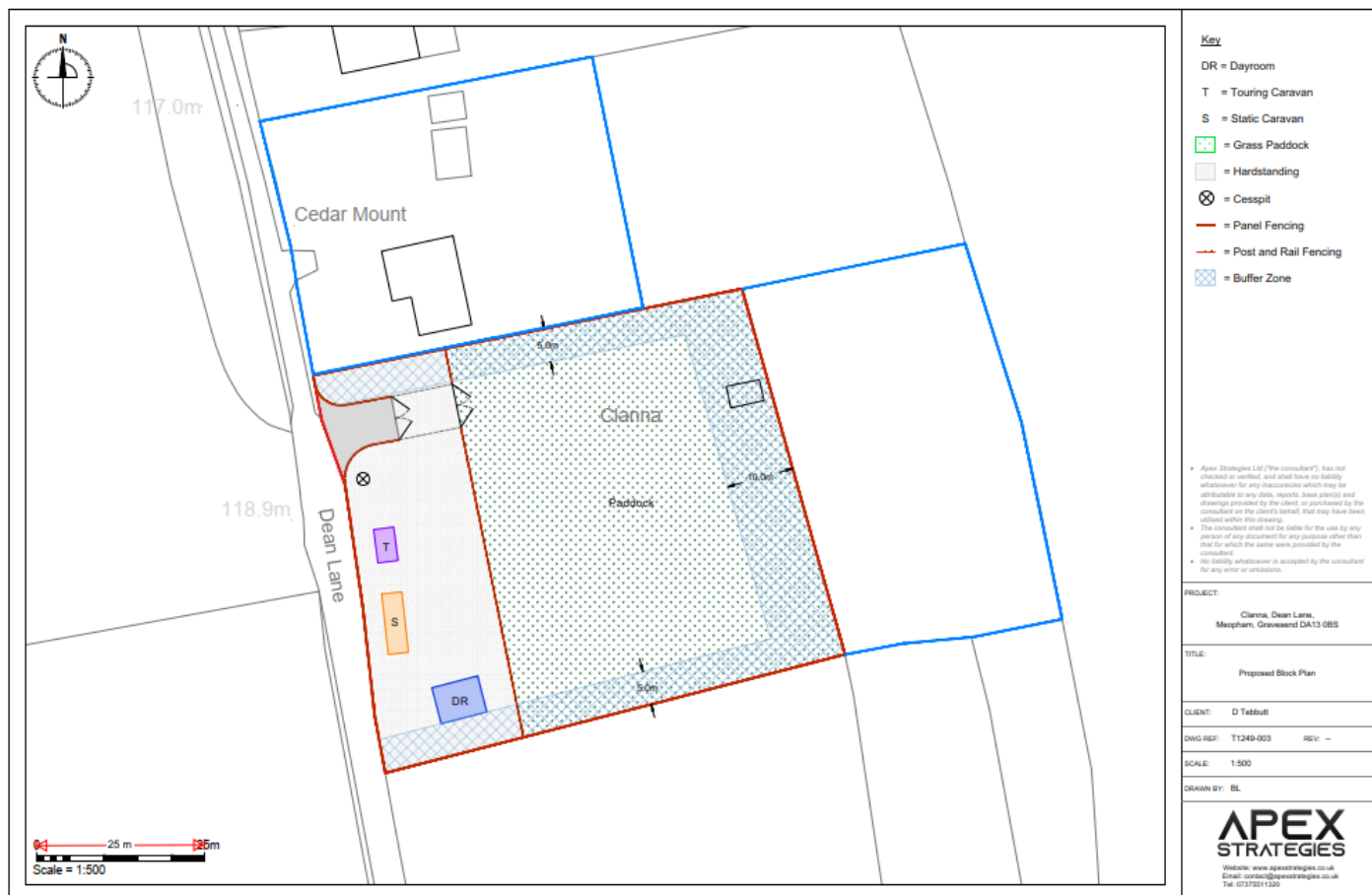
One letter of representation has been received:

This whole site was mature woodland with many large trees up until approx. two years ago, when it was completely cleared by the then owner. It has never been developed, and only things there, was an ancient derelict caravan, that had been there 40 plus years, and an equally ancient shed at the rear of the plot.

Officer's Analysis

Proposal

This application seeks part retrospective permission for 1no mobile home, 1no touring mobile, 1no dayroom, hardstanding, fencing and associated soft landscaping. The proposed layout is shown below:



The proposed day room will be approx. 7.22m deep, 3.52m high, 5.75m wide. Internally it will provide for a kitchen, bathroom and lounge/diner.

It is not clear from the plans where the close boarded fencing and/or close boarded fencing is to be placed. The plans show both surrounding the whole site. The plans also show a buffer zone but it is not clear what this is or why it is required.

The Main Issues

The main issues in this submission relates to:

- Green Belt
- Grey Belt
- Need for and supply of Gypsy sites
- Gypsy and Traveller Status
- Personal Circumstances and Best Interests of the Child
- Cumulative Impacts
- Character and Appearance
- Sustainable Location
- Effects on Residential Amenity
- Parking and Highway Safety
- Drainage
- Biodiversity
- Grant of Temporary Permission
- Human Rights and Equality Act
- Whether Very Special Circumstances Exist

Green Belt

The NPPF (2024) states at Paragraph 142, that 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. At Paragraph 153, it is stated that, 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. Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate. At Paragraph 154 the Government sets out the exceptions to development in the Green Belt not being inappropriate.

Paragraph 16 of the PPTS states that: "Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in Chapter 13 of the National Planning Policy Framework apply".

Whether the proposal is inappropriate development in the Green Belt

Paragraph 154 of the NPPF (2024) states that 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.

Clearly (a), (b), (c), (d), (f) and (h) do not apply in this instance as the proposal is not for agriculture or forestry, appropriate facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds or allotments, extension or alteration of an existing building, is not a replacement building, it is not affordable housing.

Exception (e) allows limited infilling in villages. Neither the NPPF (2024) or the development plan define the terms 'limited', 'infilling' or even what constitutes a 'village'. Because of this, the following points need to be addressed to determine whether the proposal should be considered as an exception or be deemed 'inappropriate' development.

These points are:

Whether the settlement to which the site relates is a village or not?

Whether the site is within a village?

Does the proposal constitute infilling?

If the proposal does constitute infilling, is the infilling limited?

The adopted Gravesham Local Plan Core Strategy (2014) at 4.2.4, Table 2 and at 4.2.6 sets out a settlement hierarchy with 13 rural settlements inset from the Green Belt and two others (Harvel and Luddesdown) that are 'washed over'. None are specifically identified as 'villages'.

It is stated at 4.2.6 that where the rural settlements have been inset, the 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.

This settlement hierarchy (Table 2 from the Local Plan Core Strategy) is reproduced below:

First Tier Settlements	Gravesend/Northfleet/Ebbsfleet, i.e. the urban area
Second Tier Settlements	Istead Rise, Hook Green Meopham, Higham
Third Tier Settlements	Culverstone Green, Meopham Green, Vigo
Fourth Tier Settlements	Cobham, Shorne, Sole Street
Other Settlements	Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway, Three Crutches

As noted above, there is no definition of a 'village' in either the NPPF (2024) or the development plan. Whilst the boundaries and status of individual rural settlements may be subject to review in the context of the emerging Site Allocations and Development Management Policies DPD, the boundaries shown on the policies map derive directly and are unchanged from those shown on the Gravesham Local Plan First Review proposals map (1994) as villages under now defunct policy V1.

This issue in Gravesham's context has been considered at appeal a number of times, for example the Planning Inspector for an appeal reference no. APP/K2230/W/16/3161653 (see appendix 1) considered whether Culverstone Green (to the south of the Borough) is a village stated:

Culverstone Green is defined in the Council's Core Strategy (CS) 2014 as a 3rd tier settlement and it is inset from the Green Belt boundary. Paragraph 4.2.6 of the CS states that where settlements have been inset, the 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. From what I have seen and read, it seems to me that Culverstone Green may be regarded as a 'village' for the purposes of this aspect of this appeal.

Whether or not a proposal would constitute limited infilling in a village for the purposes of Paragraph 154 e), is a question of fact and planning judgment for the decision maker, dependant on an assessment of the position on the ground, as established in *Julian Wood v SSCLG, Gravesham Borough Council* [2015] EWCA Civ 195; and *R (Tate) v Northumberland CC* [2017] EWHC 664 (Admin).

The closest village to the application site is some 1.5km which is Harvel however, save for a café, there are no other amenities here. The closest amenities are the Meopham parade of shops and the Culverstone service station both of which are third tier settlements and are approximately 2.8km away as the crow flies. There are no pavements that serve the application site, no cycle lanes or bus services.

Built form around the site is sparse with field opposite to the west and woodland behind to the east.

Whether the site is within a village is a matter for assessment on the ground and having regard to the evidence. Development plan settlement boundaries may not be determinative, especially given these were drawn up some years ago since which time, the nearest settlement of Harvel may have undergone changes. Taking into consideration the overall settlement characteristics of Harvel, the distance this is from the application site, the intervening fields and woodland, it is clear that the site is outside of a village. As such the site is very much removed from the settlement of Harvel.

As the site lies outside the village boundaries the application fails exception (e) and it is not considered to necessary to determine if the proposal is considered 'limited infilling'. However, given the size of the gap, the proximity of neighbouring development and the open nature of the site, it is not considered that the proposal would constitute infilling, albeit the delivery of a single pitch could be considered to be limited in nature.

Exception (g) allows the partial or complete redevelopment of previously developed land which would not cause substantial harm to the openness of the Green Belt. The NPPF defines previously developed land as:

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.

Prior to works taking place, the land was in an agricultural use and therefore the site does not fall within the definition of previously developed land; as such the above definition does not apply to this site and the application does not meet exception (g).

In summary the proposal does not meet any of the exceptions listed in paragraph 154 of the National Planning Policy Framework 2024 and is therefore inappropriate development in the Green Belt which is, by definition, harmful.

Grey Belt

Having concluded the development does not meet any of the exceptions of paragraph 154 of the NPPF, consideration needs to be given to paragraph 155 which discusses grey belt land and states:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- 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 this Framework; and*
- d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

The definition of ‘grey belt land’ is set out in the Glossary of the NPPF 2024 and is defined as:

‘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.’

Footnote 7 states:

The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

The application site lies within the Kent Downs National Landscape and therefore does not fall within the definition of Grey Belt and paragraph 155 does not apply.

Need for and supply of Gypsy sites

Accommodation for Gypsies and Travellers is a specific type of accommodation that Councils have a duty to provide under the Housing Act (2004). The guidance in Policy B of the 2024 PPTS requires Local Planning Authorities to set their own target for the number of pitches to be provided in their areas, using a robust evidence base and to identify and update annually a supply of specific deliverable sites to provide 5 years’ worth of sites against their locally set targets, and a supply of specific developable sites or broad locations for growth for years 6 to 10 and where possible for years 11 -15.

The identified need for new Gypsy and Traveller pitches in the borough is derived from the Gypsy and Traveller Accommodation Assessment (GTAA) 2022. This GTAA updates and assesses need for pitches in the Borough, over the period 1 April 2022 – 31 March 2040, taking account of the proposed occupants of new pitches permitted since 2017. This covers the remaining 6 years of the Local Plan Core Strategy plan period (2022 – 28) and will inform the evidence base for the emerging Local Plan period (2025 – 2040).

The Council is aware that the need identified in the 2022 GTAA does not take account of the updated planning definition of Gypsies and Travellers in the 2023 or 2024 PPTS as it pre-dates these changes. It is acknowledged that the need therefore within the Borough, will be greater than the need for pitches for Gypsies and Travellers that solely met the pre-2023 PPTS definition. The Council is currently in the process of understanding the implications of the revised 2024 PPTS definition and is engaging with the consultants who undertook the 2022 GTAA on the matter.

A summary of pitch need over the plan period 2022 – 2040 is set out below in Table 1. This shows that there is a need to provide 20 pitches between the period 2022 to 2028 for those Traveller households who met the 2015 planning definition.

Table 1 Gypsy and Traveller pitch need April 2022 – 2040.

Households that meet the planning definition (pre-Dec 2023 definition)	2022 - 2027	2027-2028	2028 - 2040	2022 - 2040
Total	19	1	20	40
Annual requirement	3.8	1	1.66	2.22

For completeness Table 2, below, details the need broken down into 5 year periods, taking into consideration the needs of those Traveller families who did not meet the planning definition, or where it was undetermined whether or not they met the definition. From this it is clear that the need for new pitches is likely to increase.

Table 2 Gypsy and Traveller pitch needs April 2022 – 31 March 2040

Period 1 April – 31 March	Pitch Need Meet the Planning Definition (PPTS 2015)	Pitch Need Non-Planning Definition (PPTS 2015)	Pitch Need Undetermined whether they meet the Planning definition or not	Overall Pitch Requirement
2022 - 2027	19	12	0	31
2028	1	0	0	1
2028 - 2032	4	4	1	9
2032 – 2037	10	1	1	12
2037 -2040	6	1	0	7
TOTAL	40	18	2	60

An extract from table 6 of the Five year Gypsy and Traveller Pitch Supply Statement 2024 -2029 illustrates the overall 5 year housing land requirement for the period April 2024 – March 2029 for those traveller households who met the 2015 planning definition and the overall traveller household need (i.e. those that did not meet the pre-2023 definition).

Table 3 Pitch Needs April 2024 – March 2029

	Scenario 1: Pitch Need Meet the Planning Definition (PPTS 2015)	Scenario 2: Overall Pitch Requirement
Outstanding need (April 2022 – March 2024) + 5 year land requirement (April 2024 – March 2029)	20.8 pitches (7.6 + 13.2)	33.8 pitches (12.4 + 21.4)
5 Year Annual Pitch Requirement	4.16 pitches	6.76 pitches

Since April 2024, planning permission has been granted for 5 pitches (APP/K2230/W/24/3336250, APP/K2230/W/24/3336645 and APP/K2230/W/25/3363212).

From this it is clear that in July 2024, the council could not demonstrate a 5 year supply of deliverable pitches. Therefore, there is a significant shortfall in past delivery and future supply. Consequently there is a

demonstrable unmet need for Gypsy and Traveller pitches within the Borough and this should be afforded significant weight.

Gypsy and Traveller Status

'In light of both domestic and European Court judgments' the Government amended the planning definition of 'gypsies & travellers' as set out in the PPTS to ensure that the accommodation needs for those persons with a cultural tradition of nomadism or of living in a caravan are covered by the Planning Policy for Traveller Sites.' The revised definition (Annex 1 of the PPTS) is as follows:

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

As noted above, the definition includes those who are of a nomadic habit of life who have ceased to travel temporarily or permanently because of their own, or their dependants', health or education needs or old age, and all other persons with a cultural tradition of nomadism or of living in a caravan. Whilst the previous PPTS set out regard should be had to whether a Traveller previously led a nomadic habit of life, the reasons for ceasing their nomadic habit of life, and their intentions of returning to a nomadic habit of life, this requirement has been removed from the current PPTS.

The supporting statement submitted with the application contains no information of who will occupy the site other than the applicant and their dependents. There is no information regarding the number of people or their ages. Whilst it states that they are of gypsy heritage, travel for work and attend fayres there is no other information. The application has therefore not sufficiently demonstrated the intended occupants of the proposed pitches and whether they meet the definition of gypsies and travellers as defined in Planning Policy for Travellers Sites, December 2024.

Personal Circumstances and Best Interests of the Child

Paragraph 25 of the PPTS lists relevant matters when considering planning applications for traveller sites. The personal circumstances of the applicant is one such consideration. The application comprises one pitch with a static caravan and one touring caravan and a dayroom to facilitate the nomadic way of life for the applicant and his immediate family members on a permanent basis. The application does not contain any information setting the case for the applicant other than stating the need for a settle base after needing to move off of a shared site. There is no detailed information regarding the status of the occupants, their ages or personal circumstances. There is mention of children living on the but here is no information as to whether the dependents are school age or attend a local school. There is no information about where they have been residing prior to Dean Lane.

As set out in Stevens -v- SSCLG & Guildford Borough Council [2013] EWCH 792 (Admin) 10 April 2013, *"the best interests of any child must be kept at the forefront of the decision-maker's mind as he examines all material considerations and performs the exercise of planning judgment on the basis of them; and, when considering any decision he might make (and, of course, the eventual decision he does make), he needs to assess whether the adverse impact of such a decision on the interests of the child is proportionate."*

It was held in Chapman v UK 33 EHRR 399 that, *"where a dwelling has been established without the planning permission which is needed under the national law, there is a conflict of interest between the right of the individual under Article 8 of the Convention to respect for his or her home and the right of others in the community to environmental protection. When considering whether a requirement that the individual leave his or her home is proportionate to the legitimate aim pursued, it is highly relevant whether or not the home was established unlawfully. If the home was lawfully established, this factor would self-evidently be something which would weigh against the legitimacy of requiring the individual to move. Conversely, if the establishment of a home in a particular place was unlawful, the position of the individual objecting to an*

order to move is less strong. The Court will be slow to grant protection to those who, in conscious defiance of the prohibitions of the law, establish a home on an environmentally protected site. For the Court to do otherwise would be to encourage illegal action to the detriment of the protection of the environmental rights of other people in the community.”

The judgement in Chapman goes on to state that a further relevant consideration to be taken into account is that “...if no alternative accommodation is available the interference is more serious than where such accommodation is available. The more suitable the alternative accommodation is, the less serious the interference constituted by moving the applicant from his or her home.”

As the proposal is for a traveller family, an assumption has been made that the Traveller pitch could accommodate travellers with a child, and that a child would benefit from a settled base, with access to educational facilities and health care services, with the parents/carers also benefiting from access to health care services. In addition, as the application is retrospective in nature, it is assumed that a Traveller family are residing at the site at present, and that the interference with the Article 8 rights held by the appellant and their families would be significant, but would be both necessary and proportionate in the event that the planning judgement reached is that this application should be refused and permission not granted. However, as part of the planning judgement this will require consideration to be given to whether policy objectives could be achieved by means that interfere less with the rights of the Traveller family occupying the site.

Those on site may also share protected characteristics of race for the purposes of the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010. As such should a planning judgement be reached not to grant a permission, this would impact negatively on the family's way of life and would reduce the opportunities available to them. It would also deny or reduce the opportunities available to foster good relations with the settled community, including those of any child who potentially maybe attending a local school.

Cumulative Impacts

The PPTS at Para. 26 states that Local Planning Authorities should strictly limit new traveller development in the countryside, where sites are in rural areas they should not dominate the nearest settled community and/or place undue pressure on local infrastructure. This is further expanded on at Para. 27 where the PPTS sets out matters to which Local Planning Authorities should add weight. These include, making effective use of brownfield, untidy or derelict land; sites that positively enhance the environment and increase its openness; promoting opportunities for healthy lifestyles; and not enclosing in a manner which gives the impression that the site and its occupants are isolated from the rest of the community. In addition, policy CS17 of the Local Plan Core Strategy outlines the criteria to be met in Gypsy and Traveller development.

Dealing first with the whether the proposal is likely to dominate the nearest settled community, it is considered given the single pitch involved in this proposal, this would not be the case.

The proposals involve the creation of one pitch for a static caravan, a touring caravan and a dayroom and hardstanding. It would inevitably extend built development to the site which, as can be seen below, was previously undeveloped (Google Earth, 2022):



The site has been cleared and boundary treatment erected as can be seen below (Google Earth, March 2024)



March 2023 site photo.



The proposed mobile homes would have the appearance of bungalows and would be relatively conspicuous in this valued rural landscape which is designated a National Landscape. The collective presence of the mobile home, touring caravan, day room and associated domestic paraphernalia would result in additional cumulative effect in terms of their impact on the countryside and surrounding valued landscape.

In addition, contrary to Para. 27 d) of the PPTS, the site given its location when taken into context with both the existing and proposed soft and hard landscaping, would give the impression that the site and its occupants are deliberately isolated from the rest of community.

On this issue, considering this proposal is for one pitch, whilst it would not dominate the nearest settled community, it would introduce development onto previously undeveloped land. Given the distances from the nearest settlement (Harvel) and the openness of the site the proposal is considered to have an adverse impact on the valued landscape (as discussed further below). The resulting cumulative effect on the countryside and valued landscape would therefore conflict with the objectives of Policy CS12 (Green Infrastructure), CS17 (Traveller Sites) and CS19 (Development and Design principles) of the Local Plan Core Strategy and paragraph 187 of the National Planning Policy Framework (NPPF) 2024, which together seeks to conserve and enhance the natural environment. This is in addition to conflicting with the requirements set out in Paras 26 and 27 of the PPTS.

Character and Appearance

Policy CS19 of the Core Strategy seeks to ensure that new development is visually attractive and locally distinctive. The policy requires development to conserve and enhance the character of the local and built natural environment and integrate well into the surrounding area.

The proposed plans show a static caravan, a touring caravan, day room and hardstanding. Details of the fencing are also included which show post and rail fencing around the site save for the entrance which will have 2m high close boarded fencing. The proposed caravans are not considered to conserve or enhance the character of the area. The day room is finished in brick with timber cladding and a tiled roof. Where there are buildings, these are mixed in design and type and therefore these proposed materials are not considered out of character.

Policy CS12 of the Gravesham Core Strategy 2014 states that the 'overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant'.

Kent Downs National Landscape

The site lies within the Kent Downs National Landscape and therefore the Kent Downs Management Plan is a material planning consideration. Policy SD2 states that:

The local character, qualities, distinctiveness and natural resources of the Kent Downs AONB will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements.

Policy SD3 states that:

Ensure that development and changes to land use and land management cumulatively conserve and enhance the character and qualities of the Kent Downs AONB rather than detracting from it.

Policy SD8 states that:

Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB.

Policy LLC1 states:

The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.

The introduction of a traveller site with static caravan, day room and touring caravan neither conserves or enhances the local character, qualities, distinctiveness and natural resources of the National Landscape. The loss of natural features results in a negative impact to the landform and special qualities of the area. The proposals therefore conflict with Policies LLC1, SD2, SD3 and SD8 of the Kent Downs National Landscape Plan.

Paragraph 187 of the National Planning Policy Framework 2024 states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where*

appropriate.

Paragraph 189 states:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

The site is within the Harvel Wooded Downs Landscape Character Area which is described as having the following key characteristics:

- 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 landform is characteristic of the North Downs dip slope featuring a series of dry valleys and ridges. Harvel, to the south, is situated on a higher and flatter plateau. Views both within and out of the character area are limited because of the combined effect of topography and the heavily wooded character of the landscape. Tree cover is dominant, with mostly chestnut coppice woodland creating a very enclosed landscape with limited views. There are also areas of ancient woodland, and some evergreen and ornamental garden planting is associated with settlements. This specific site is not mentioned however the overall area is described as having a comprehensive network of winding, often sunken, narrow lanes throughout the area. Footpaths and byways run throughout the area, particularly to the west.

The condition of the landscape is considered moderate and the sensitivity is moderate. The guidelines are to conserve and create particularly the woodland, narrow lanes and traditional and distinct buildings, materials and elements.

The proposal introduces an alien feature into the landscape that neither conserves or creates the surrounding woodland character. The proposed development will therefore detract from the character and appearance of the landscape and is contrary to the guidance within the Gravesham Landscape Character Assessment, Policy CS12 and CS19 of the Local Plan Core Strategy that seek to ensure that new development conserves the overall landscape character.

Sustainable Location

Section 9 of the Framework indicates that the planning system should actively manage patterns of growth to facilitate development in locations which are sustainable and generally limit the need to travel. In this case the application site is located off a minor rural lane and is physically well away from the nearest settlement with basic services.

Paragraph 110 of the Framework states:

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable

transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

The site is not within a sustainable location or a location that can be made sustainable. There is no way of limiting the need to travel from this site as it is a significant distance from any amenities (over 2.8km as the crow flies, therefore further on foot/cycle). There is also no choice of public transport.

Sustainable transport was discussed in appeal reference APP/K2230/W/20/3271514 (appendix 2) and more recently in appeal reference APP/K2230/W/25/3363212 (appendix 3). This site was 0.8km from the nearest settlement, located on a narrow rural lane with no pavements and was found to be in an unsustainable location. This application site is much further from any amenities with no footpaths or cycle lanes and therefore stands to reason that it is located in a much more unsustainable location.

Although the Framework has since been updated, section 9 and paragraph 110 still require the planning system to actively manage patterns of growth and there is no substantive change in the policy position. Similarly, paragraphs 13 and 26 of the PPTS require that traveller sites in the countryside, away from existing settlements should be strictly limited, contribute to sustainability, promote access to local services and reduce the need for long-distance travelling and environmental damage associated with unauthorised encampments. As stated earlier, the site is closest to Harvel where there is only a café and approximately 2.8m as the crow flies from the Meopham parade of shops and the services at Culverstone. The road network of rural lanes is circuitous, and the location of the site therefore weighs against the development in terms of accessibility to local services.

The site is therefore not considered a sustainable location and therefore conflicts with Policy CS19 of the Gravesham Core Strategy 2014 and paragraph 110 of the National Planning Policy Framework 2024.

Effects on Residential Amenity

Government guidance in paragraph 135 of the NPPF (2024) state that planning should 'always seek to secure high quality design and a good standard of amenity for all existing and future occupants of buildings and land. These core principles are in line with provisions of Policy CS19 of the Local Plan Core Strategy, which requires proposals to safeguard residential amenity, including privacy, daylight and sunlight.

No plans have been provided to demonstrate whether the static caravan will provide a decent standard of accommodation for future occupiers however, the size of the caravan is similar to others in the Borough which offer sufficient levels of accommodation. The layout within the site is spacious and future occupants of the proposed mobile home would be provided with a decent outdoor amenity space.

In terms of neighbouring amenity, there is no residential accommodation within close proximity. The nearest residential dwelling is approx. 38m away from the proposed position of the static caravan. Due to the distances involved there will be no detrimental impact to any neighbouring dwellings in terms of loss of outlook, daylight, sunlight or privacy.

Owing to the nature and scale of development, vehicular movements to and from the site are unlikely to significantly impact on the occupants of properties along Dean Lane in terms of noise and disturbance however a condition is recommended if any permission is forthcoming to ensure noise does not become a nuisance. No overriding residential amenity issues are considered to be raised in the application.

Therefore residential amenity of the future occupiers of the site would comply with requirements in policy CS19 of the Local Plan Core Strategy and paragraph 135f of the National Planning Policy Framework 2024.

Parking and Highway Safety

The site and pitch would make use of an existing access from Dean Lane and there is adequate hard surface space available within the plot for parking of vehicles associated with the pitches proposed, and for vehicle manoeuvring enabling vehicles to enter and leave the site in a forward gear.

Government guidance in the revised NPPF advises that development proposals should only be refused on transport grounds where the residual cumulative impact of the development is severe and cannot be mitigated by off-site improvement to the transport network. The level of additional vehicle movements to and from the site resulting from this proposal is not likely to lead to a significant increase in traffic generation, unacceptable intensification of use of the local road network or raise any overriding highway safety issues.

Overall, on this basis, it is considered that the impact upon highway capacity would be acceptable. The proposal would comply with policy T1 of the Gravesham Local Plan: First Review (1994), which seeks to mitigate the adverse impact of development on the highway network.

Drainage

Policy CS19 (LPCS) requires development to not pose an unacceptable risk or harm to the environment, including the quality of ground waters. This is reflected within the NPPF at paragraph 187 (e) which requires new development to not have an adverse impact ground water conditions. Further guidance is provided by Planning Practice Guidance at Paragraph: 020 Reference ID: 34-020-20140306 which is clear that non mains drainage (Septic tanks) are only acceptable if demonstrated by the applicant that discharging into a public sewer is not feasible and states the following:

Septic tanks or package sewage treatment plants may only be considered if it can be clearly demonstrated by the applicant that discharging into a public sewer is not feasible (taking into account cost and/or practicability and whether the package treatment plant poses a risk to a designated site) in accordance with Approved Document H of the Building Regulations 2010. Septic tanks must not discharge effluent to surface water and must comply with the general binding rules, or a permit will be required.

For this proposal to be acceptable in relation to ground water it will need to comply with the above requirements.

The Environment Agency has not been consulted however on other similar schemes they have suggested the following condition which would also be applicable to this site:

No development shall commence until a strategy to deal with foul water drainage is submitted to, and approved in writing by, the local planning authority.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 187 of the National Planning Policy Framework.

If the application were to be allowed at a later date it is recommended that this condition be imposed. Subject to this condition the proposed development accords with Policy CS19 of the Gravesham Core Strategy 2014 and paragraph 187 (e) of the National Planning Policy Framework 2024.

Biodiversity

Biodiversity Net Gain

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The biodiversity net gain condition is that the development may not be begun unless:

- (a) A biodiversity gain plan has been submitted to the planning authority, and
- (b) The planning authority has approved the plan

In this case, the application is retrospective and therefore a pre-commencement condition cannot be applied.

Ecology

The site is located within a biodiversity opportunity area, adjacent to the local wildlife site (Strawberry Hill Pasture and Woodland) and close to, but over 15m from, an ancient woodland. In terms of ecology Policy CS12 of the Gravesham Core Strategy 2014 states that there will be no net loss of biodiversity in the Borough and opportunities to enhance, restore, re-create and maintain habitats will be sought. This is reinforced by paragraph 187 of the National Planning Policy Framework 2024. A significant amount of biodiversity has been lost on site and no attempt has been made to mitigate against this. Lighting details have been provided however they do not show the position of lights or the light spill and therefore are inadequate. Without a detailed ecological report or lighting plan it is not possible to assess the extent of loss or impact on ecology and biodiversity and therefore the proposed development conflicts with policy CS12 of the Gravesham Core Strategy 2014 and paragraph 187 of the National Planning Policy Framework 2024.

Grant of Temporary Permission

The PPTS states that a temporary planning permission may be appropriate where it is expected that planning circumstances will change in a particular way at the end of the period. As indicated to above, there is a process in place for addressing identified need for Traveller sites in the District, which may involve the release of Green Belt land, in the absence of any suitable sites coming forward in the urban area and rural settlements inset from the Green belt, and in the event a case for exceptional circumstances can be demonstrated. Whilst it is recognised that there has been policy failure to date, in so far as a replacement Local Plan has not yet been adopted, the Council published a Local Development Scheme on 24 February 2025, which sets out that a Regulation 19 consultation will be undertaken in the Summer of 2025, with the emerging Local Plan submitted for examination in December 2025. The Regulation 19 document will address the lack of land supply for both Travellers and traditional forms of housing.

The application site is not considered to be a suitable location for the type of development proposed, as it is located within the Green Belt and is considered inappropriate development. The supporting information has not sufficiently demonstrated there are special personal circumstances to warrant the grant of planning permission on temporary basis. In also considering that a Traveller family maybe residing at the site and in considering the best interests of any child it is not considered that a grant of planning permission on a temporary basis would be warranted. In addition to this the proposal is considered to impact negatively on the wider National Landscape and landscape character.

For all the reasons above it is not considered there is reasonable justification for granting temporary permission for this proposal.

Human Rights and Equality Act

Article 8 of the European Convention on Human Rights, as incorporated into UK law by the Human Rights Act 1998, protects the right of an individual to, amongst other things, a private and family life and home. Furthermore, the courts have held that the best interest of the children shall be a primary consideration in all decisions concerning children including planning decisions. The Council in the exercise of its statutory functions must have due regard to the Public Sector Equality Duty (PSED) contained in the Section 149 of the Equality Act 2010. The Act imposes a duty on all public authorities to have due regard to the need to;

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this act.
- Advance equality of opportunity between persons who share a relevant protected characteristics and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

Gypsies and Travellers have a protected status under the Equalities Act 2010 by virtue of having a relevant protected characteristics. The Council is therefore duty bound to consider decisions that have a disproportionate adverse impact on a protected characteristics, even if this impacts may be unintentional. This may involve an understanding of the practical impact on individuals affected by the decision. Regards should be had to the effect of mitigation taken to reduce any adverse impact. PSED is only one factor that needs to be considered when making a decision and may be balanced against other relevant factors.

In addition, the Council needs to consider its duties under the Human Rights Act, in particular Article 8 and Article 1 of the First Protocol to the Convention of Human Rights which states that a person is entitled to the right to respect from family and private life and the peaceful enjoyments of their property. Any action of the Council needs to be proportionate in the balance of public and private rights.

In this case, no evidence has been put forward regarding the ethnicity of the intended occupants of the proposed accommodation to demonstrate they meet the planning definition of 'gypsies & travellers' as set out in the PPTS. In addition, no verifiable information has been put forward to demonstrate refusing this application would interfere with right to respect private and family life of the applicant, including their traditional nomadic way of life. Despite this position, given that the site is intended for a Traveller family, and the family may include one or more children, and given the proposal is retrospective in nature, the Council in reaching a decision will take into consideration the impacts upon the family.

Article 8 of the European Convention of Human Rights is a qualified right requiring a balance between the rights of the individual and public rights, which include the impact on the Green Belt, Landscape Character and National Landscapes.

In this case, it is recognised that if planning permission is refused the family resident at the site would need to vacate the site. Ultimately this may lead to this family not being able to find a legal site and they could be forced to pitch at the roadside. In particular, this would have a significant adverse impact upon any children. Over and above the obvious adverse impact that such disruption would cause, any child in school would lose a stable base that has enabled them to obtain schooling and, access to other facilities such as health services. As such Article 8 is engaged.

However, the right to respect for family life is not absolute: interference with that right can be justified if that interference is (i) for a legitimate aim, (ii) in accordance with the law, and (iii) necessary in the public interest. In this case, there are multiple legitimate aims namely the protection of a Green Belt, the protection of the National Landscape and the protection of the environment including ecology. These matters are in accordance with the Development Plan and material (planning) considerations as required by the domestic planning regime.

Any potential interference with the applicant's human rights and the best interest of any child is therefore considered proportionate and necessary in the wider public interest.

Whether Very Special Circumstance Exist

The proposed development amounts to inappropriate development within the Green Belt. Very special circumstances will not exist unless the harm to the Green Belt by way of inappropriateness and any other harm is clearly outweighed by other material considerations. In addition to harm by way of inappropriateness, the development will cause moderate harm to the openness of the Green Belt.

In addition, the proposal will cause harm to the character and appearance of the area, has resulted in the loss of biodiversity, is poorly located in terms of the distance from shops and services with limited travel choices beyond the private car. These matters weigh significantly against the grant of permission.

On the opposite side, whilst the applicant has not provided any supporting evidence to corroborate their claim that they fall within the PPTS definition, there is a clear unmet need for traveller sites and the Council is not able to demonstrate a five year supply which carries significant weight. Nevertheless, even if they did produce evidence to show they meet the definition, the impact on the Green Belt, National Landscape, landscape character, unsustainable location, and biodiversity combined outweigh the unmet need.

The site is poorly located in transport terms and causes harm to the character and appearance of the area, such that it would not make a suitable traveller site when assessed against the policies of the PPTS.

It follows then that the very special circumstances needed to justify a grant of permission on a permanent basis do not exist.

The balance when considering a temporary permission is clearly different in that the harm would only endure for a temporary period. However, the Framework requires that substantial weight is given to any harm to the Green Belt, temporary or otherwise. The weight attached to the other harm is slightly reduced on account of its temporary nature. The site would still remain unsuitable in locational terms, even for a temporary period.

A temporary permission would help to address the shortfall in site provision in respect of the need for local sites and policy failure and would lessen the impact on those residing at the site. However, the case presented in respect of personal circumstances, i.e. none, is not sufficient to demonstrate that the weight of those matters clearly outweighs the harm, even on a temporary basis. Accordingly, the very special circumstances needed to justify a temporary grant of permission have not been demonstrated.

Overall Planning Balance

For the reasons given, the development is contrary to the policies of the development plan, taken as a whole and represents inappropriate development within the Green Belt. In the absence of very special circumstances, and despite taking into consideration human rights and equality matters, there are no material considerations to indicate that a decision should be taken other than in accordance with the development plan and material (planning) considerations, therefore planning permission should be refused. No conditions can overcome the harm to an extent that would warrant a grant of permission on a permanent or temporary basis.

The proportionality assessment required by Article 8 necessitates a balancing exercise to ascertain whether the rights of the occupiers would be disproportionately interfered with should planning permission be refused. In making that assessment the Council has had regard to the personal circumstances described and the positive obligation to facilitate the Traveller way of life. Weighed against that is the public and community interest. Regulation of land through the planning system can be said to be in the public interest with the legitimate aims of protecting the economic well-being of the country and public safety.

Economic well-being would encompass protection of the environment through the avoidance development that would cause harm to the character and appearance of the countryside, the protection of the Green Belt and the need to regulate the use of land to ensure that development is located in suitable proximity of shops and services. For the reasons set out above, the harm arising from the development in respect of those matters is significant and the legitimate aims of protecting the environment and public safety attract

greater weight.

The interference in this case would be a proportionate response and is necessary having regard to legitimate land use planning objectives.

These conclusions would apply equally to a temporary planning permission. The harm would be temporary but the development would remain contrary to the aims of the development plan and inappropriate within the Green Belt. Whilst the balance is slightly different, the view remains that the interference would be necessary and proportionate having regard to legitimate land use objectives.

It is acknowledged the under supply of traveller pitches and lack of suitable sites in the Borough to meet the needs of those meeting the planning definition of 'gypsies & travellers' in the district, and is being addressed via the emerging Local Plan.

The proposed development is located within the Green Belt where such development is considered inappropriate. The land is not considered previously developed and does not meet the definition of Grey Belt.

The site is also located in the open countryside within a valued National Landscape and will have a detrimental impact on the character and appearance of this landscape character.

Whilst no supporting information has been provided that sufficiently demonstrates there are special personal circumstances to warrant the grant of planning permission, the Council has taken into consideration that the site could meet the needs of a family who are Travellers. These matters must be significant weight.

Whilst the lack of traveller site in the Borough is a material planning consideration, that is given significant weight, this is not in itself sufficient to outweigh the harm that would arise from permitting this development.

In compliance with the Human Rights and Public Sector Equality Duty (PSED) contained in the Section 149 of the Equality Act 2010, due consideration has been given to personal circumstances of the applicant, including the best interest of the child, however, these are not considered to outweigh the legitimate aims set out with the domestic planning regime, as such interference with such rights is warranted for a legitimate aim, in accordance with the law, and necessary in the public interest.

Refusing the application will undoubtedly interfere with the applicant's and their family's Human Rights, however this must be considered in light of the wider public interest. In these terms greater weight due to the nature of the harm caused by this proposal, has to be given to the wider public interest.

Recommendation:

The recommendation is to refuse this application.

Reasons for refusal:

The proposed mobile home, touring caravan, dayroom, boundary treatment and hardstanding will be located within the Metropolitan Green Belt where development is considered inappropriate. The proposal will introduce a built development, hard surfacing and mobile structures onto a previously undeveloped site which will harm the openness of the Green Belt and result in encroachment of built development into the countryside. In the absence of any very special circumstances to outweigh the degree of harm caused to the Green Belt and other identified harm the proposal is contrary to the requirements set out in Section 13 (paragraph 153 of the National Planning Policy Framework 2024, the Planning Policy for Travellers Sites 2024 and policies CS01 (Sustainable Development) and CS02 (Scale and Spatial Distribution of Development) of the Gravesham Local Plan Core Strategy (2014).

The site lies within the Kent Downs National Landscape and Harvel Wooded Downs Landscape Character Area. The proposal, by virtue of its location, nature, scale and spread, combined with the specific characteristics of the site and the immediate surroundings, in particular the open and locally prominent location will cause harm to the local rural landscape character and detract from the rural and visual amenities of the area, contrary to policies CS12 (Green Infrastructure) , CS17 (Traveller Sites) and CS19 (Development and Design principles) of the Gravesham Core Strategy (2014) and Policies SD2, SD3, SD8 and LLC1 of the Kent Downs National Landscape Management Plan which seek to ensure that new development conserves and enhances the natural environment and landscape character in line with the Gravesham Landscape character Assessment and integrates well into the surrounding area.

The proposed development results in the loss of biodiversity with no compensatory measures in terms of mitigation planting or landscaping to offset the habitat loss and will introduce residential activity in a previously undeveloped location. The proposal will therefore fail to conserve or enhance the biodiversity value of the site in line with Core Strategy policy CS12 (Green Infrastructure).

The application site, due to its location off a minor rural lane away from existing settlements, is located within an unsustainable location and therefore does not limit the need to travel and is therefore contrary to Policy CS19 of the Gravesham Core Strategy 2014, paragraph 110 of the National Planning Policy Framework 2024 and paragraph 26 of the Planning Policy for Traveller Sites.

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

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	15 July 2025	Dated:	23rd July 2025