

Planning Validation
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

4th August 2021

Our ref: JT/4903

Dear Sir/Madam

**Re: Land Off Copt Hall Road, Cobham, Gravesend, DA13 9AU
Renewal Application, further to temporary planning permission
granted on 6th December 2019 under reference 20190310.**

Please find enclosed an application for your consideration relating to the above, together with the following drawings and documents:

- Site Location Plan @ 1:2500
- Site Layout Plan showing the site layout including the site of the mobile home and office / store
- Photos of the mobile and store
- Farm Accounts for year ended December 2020 - **confidential**.
- Farm business plan dated July 2021 and farm cash flow – **confidential**.

The following statement includes details of the proposal and sets out the relevant planning considerations:

PLANNING STATEMENT

This application relates to land at Copt Hall Road and to an established farm enterprise., a site located within the Green Belt but outside the Kent Downs Area of Outstanding Natural Beauty.

The farming enterprise is operating successfully with an on-site residential presence allowing security. Before a mobile home was stationed on the farm, the farmers experienced serious security problems due to walkers, motorbikes, quad bikes, and shooting. Gates were left open, and sheep were frightened by trespassing walkers and vehicles. Numerous incidents resulted in escaped sheep. During lambing the applicants had to sleep in their car and, realising this was not sustainable, safe, or practical, moved a mobile home onto the site to ensure safety and surveillance of their animals. The mobile home remains essential to the successful and safe operation of the farm business. A further temporary permission is required as the business is gradually developing as detailed in the Farm Business Plan.

The mobile home has dimensions of 10.7m x 3.7m and the office / store is 6m x 2.5m. The siting of the units is as detailed on the submitted drawing.

Relevant Planning Considerations

Government policy set out within the National Planning Policy Framework (2021) is relevant as is Planning Practice Guidance and The Development Plan for the site that comprises the adopted Gravesham Core Strategy (2014) and the saved policies of the Gravesham Local Plan First Review (1994).

The National Planning Policy Framework (2021)

Advice within the Framework on decision taking from Paragraph 38 advises that Local Planning Authorities should approach decision taking in a positive way to foster the delivery of sustainable development and should look for solutions.

Paragraph 84 of the Framework seeks to support a prosperous rural economy. This includes the promotion of the development and diversification of agricultural and other land-based rural businesses.

Paragraph 80 of the Framework advises that Local Planning Authorities should avoid new isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker including those taking control of the farm business to live permanently at or near their place of work in the countryside. There is no further advice provided by Government in relation to assessing the need for agricultural worker accommodation. The methodology explained in Annex A to PPS7, whilst it no longer forms part of Government policy as such, nevertheless seems the appropriate way in which this issue should be approached. This is also relevant as Gravesham Council's saved policy refers to consideration of agricultural accommodation in the same way.

Annexe A advised that temporary agricultural buildings, as proposed, are a sensible way of providing agricultural worker accommodation but should satisfy certain criteria. These criteria are met in the following ways by the farm enterprise the subject of this application:

- There is evidence of and a clear intention to continue to develop the enterprise concerned. This is evidence from the business plan and will also be apparent from a site visit and discussion with the applicants
- There is a functional need for residential accommodation on site to ensure essential care of animals which have been at risk and have required emergency attention due to the action of trespassers. Also, for care during lambing and in the event of sick animals. The applicants would not be able to manage the business safely from accommodation away from the site, hence the emergency stationing of the mobile home.
- The updated agricultural business is planned on a sound financial basis as detailed in the business plan.
- There is no other available residential accommodation on or close to the site that would provide the require surveillance and security
- The site is located close to the barn, a siting that was chosen to minimise visual impact, taking account of existing landscaping.

Green Belt policy within Section 13 of the Framework is also relevant for the consideration of the acceptability of the proposed stationing of a mobile home and office / store. Paragraph 149 of the framework allows for the agricultural buildings as an appropriate form of development within the Green Belt.

Core Strategy Local Plan

Paragraph 4.2.22 of the Core Strategy advises that the rural economy of the Borough has traditionally been dependant on agriculture, and to a lesser extent forestry, but has increasingly diversified as the agricultural industry has changed in response to modern requirements.

The Green Belt designation within the Borough has assisted in protecting the best and most versatile agricultural land and conserving soil resources and this will continue to occur.

The Core Strategy includes policy seeking to maintain the openness of the Green Belt, reflecting the policies within the National Planning Policy Framework.

Core Strategy SO8 seeks to preserve the openness of the Green Belt, maintain its national and local planning purposes, and protect it from inappropriate development.

Gravesham Local Plan First Review (2014)

Policy C10 (Agricultural Dwellings) states the following:

“The Borough Council will only give favourable consideration to applications for agricultural dwellings, where an overriding case can be demonstrated and when no satisfactory alternative means of provision is available. Such applications will be considered against the advice contained within PPG7 (Annexe E), other Government advice effective at the time and the following criteria: -

- (i) The agricultural unit must be commercially viable of itself at the time of the application
- (ii) Where the Borough Council's agricultural adviser indicates that an existing and established agricultural unit is capable of becoming commercially viable, the sitting of a caravan for a limited period may be considered
- (iii) It must be necessary rather than just convenient for an agricultural worker to be resident on the agricultural unit
- (iv) The Borough Council will need to be satisfied that there is no suitable housing available in the vicinity of the site
- (v) Care must be taken to select the most suitable site for the dwelling on the agricultural unit, in order to achieve a good relationship with existing farm buildings and the point of access and to minimise impact by making use of natural features
- (vi) The dwelling should be of a modest size and of a design appropriate to its Green Belt and countryside location.”

Emerging Local Plan (2020), Policy GB2 2 (New Dwellings for Agricultural, Forestry and other rural workers in the Green Belt) also allows for accommodation for a rural worker, including temporary accommodation.

Proposed Policy GB2 2: New Dwellings for Agricultural, Forestry and Other Rural Workers in the Green Belt

- 3.3.3. The Council will only grant planning permission for new dwellings for agricultural, forestry or other rural workers in the Green Belt (including those taking majority control of a farm business) where an essential need to live permanently at or near the place of work has been demonstrated that clearly outweighs harm to the Green Belt through inappropriateness and any other harm.
- 3.3.4. In considering whether 'very special circumstances' exist; regard will be had to:
- the functional need for the worker to live permanently at or near the place of work, including on a 24-hour basis and whether alternative arrangements are feasible;
 - the likely duration of that need, including whether the activity to which the need relates is well established and likely to persist into the future;
 - the availability and suitability of alternative residential accommodation at or near the place of work or the likelihood of it becoming available within a reasonable period of time; and
 - whether there are existing buildings available and suitable at or near the place of work that are capable of conversion.
- 3.3.5. Any new dwelling should be of a minimum size reasonably necessary to accommodate a rural worker and their immediate family and be designed and located to minimise impact on the Green Belt and countryside.
- 3.3.6. As an alternative, where need is not well established or there is doubt that it is likely to persist into the future, planning permission may be granted for a temporary unit of accommodation such as the stationing of a caravan or mobile home on site on a trial basis.
- 3.3.7. Any grant of planning permission will be subject to conditions or a legal agreement to ensure future occupation by an agricultural, forestry or other rural worker requiring accommodation in that locality and/or requiring the removal of any temporary unit of accommodation and the restoration of the site at the end of any trial period.

The proposed retention of the mobile home is compliant with Government Policy within the National Planning Policy Framework as well as adopted and emerging Development Plan Policy.

In conclusion, it is respectfully requested that planning permission is granted to allow the retention of the mobile home and office / store for a further temporary period of three years. This will allow the farming business to continue.

If you require any further information or wish to arrange to visit the site, then please do not hesitate to contact me.

Yours sincerely



Jo Tasker BSc (Hons) BTP MRTPI
Senior Associate Planning Consultant

Direct email: jo@kppcltd.co.uk

Website: www.kenparkeplanning.com