

Planning Statement

Land adjacent 2 Green Farm Cottages

Change of use of land to the keeping of horses, erection of Stables and a Sand-school. Re-submission following refusal of application 20251030



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1 Introduction

- 1.1 This Planning Statement has been submitted in support of an application for the following development at Land adjacent 2 Green Farm Cottages (hereafter referred to as 'the Site'):

Change of use of land to the keeping of horses, erection of Stables and a Sand-school. Re-submission following refusal of application 20251030

The Planning Statement should be read in conjunction with the Heritage Statement submitted as part of the application documentation.

- 1.2 This application comprises the following documentation.
- Application Form
 - Planning Statement (GSP)
 - Heritage Statement (GSP)
 - Preliminary Ecological Appraisal (KB Ecology)
 - BNG Metric (KB Ecology)
 - BNG Metric Habitat Condition Assessment (KB Ecology)
 - Drawing nos.
 - 4586.01 Site Location Plan
 - 4586.02 Existing Block Plan
 - 4586.03 Existing Block Plan with Aerial overlay
 - 4586.04 Proposed Block Plan
 - 4586.05 Proposed Block Plan with Aerial overlay
 - 4586.06 Proposed Stables
 - 4586.07 Proposed Manure Store

2 Site Context

- 2.1 The Site is located on land associated with Green Farm Shorne. Green Farm is located to the east side of Green Farm Lane approximately 730m north of its junction with the A226 Gravesend Road at Shorne Crossroads, and 200m south of Lower Road that bounds the farm to the north. The farm complex comprises the main farmhouse (Grade II listed) and a converted Granary (also listed Grade II) and now in residential use, and a range of existing agricultural buildings of various forms and sizes. The application site lies under the control/ownership of the occupiers of 2 Green Farm Cottages, the applicant and his family.
- 2.2 The farmstead is served by an access track that leads from Green Lane through the complex of buildings and which then turns northwards towards Lower Road. To the north east of the Site and east of the link to Lower Road is a pair of semi-

detached two-storey houses, one of which is occupied by the applicant and family.

- 2.3 Public Footpath NS171 runs north-eastwards across fields from Green Lane to the south of the Farm and joins the access track by the Granary building before using the alignment of the track through the farmstead as far as Lower Road.
- 2.4 The Site is located within the Green Belt. It has no other Development Plan allocation or Landscape designation.
- 2.5 The Site itself extends to approximately 0.35ha and largely comprises a paddock currently used for horse grazing located to the east of the main farmhouse. It is bounded to the north and east by a substantial hedgerow. Land levels within the site (and the holding generally), fall south to north towards Lower Road. The majority of the land associated with the holding in the vicinity of the Site, with the exception of the area around the farmstead, is comprised of open arable fields. An extensive commercial orchard has been planted in recent years on land within an adjacent holding to the east of the Site, which is known as New Green Farm.
- 2.6 The Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar Sites and the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI) lie approximately 1km north of the site, to the north of Lower Road, and largely to the north of the North Kent railway-line.

3 Relevant History

- 3.1 The following records are understood to be relevant to the Site:

Green Farm Green Farm Lane Shorne Gravesend Kent

Ref. No: 19990398: The erection of a replacement potato/grain storage building:
Prior Approval Not Required

Green Farm House Green Farm Lane Shorne Gravesend Kent DA12 3HL

Ref. No: 19990398: The erection of a replacement potato/grain storage building:
Prior Approval Not Required

- Ref. No: 20080133: Conversion of farm building into two, three bedroom dwellings and erection of a new garage block and store to serve both dwellings:
Application Permitted
- Ref. No: 20080134: Application for Listed Building Consent for internal and external alterations and refurbishment of the farm building in connection with its

conversion into two dwellings and erection of new garage block with store to serve both dwellings: Application Permitted

- Ref. No: 20080828 Application for approval of condition 18 of planning permission reference number 20080133 and Listed Building Consent reference number 20080134 relating to the schedule of repairs and method statement for reconstruction: Permitted
- Ref. No: 20080861: Application for approval of conditions 7, 8, 10, 14 and 15 of planning permission reference number 20080133 and Listed Building consent reference number 20080134 relating to the joinery details, surface treatments, boundary fence, contaminated land assessment and refuse storage areas: Permitted
- Ref. No: 20090046: Application for approval of condition 6 of planning permission reference number 20080133 and Listed Building Consent reference number 20080134 relating to the external materials: Permitted
- Ref. No: 20110988: Construction of a sand school : Application Refused
- Ref. No: 20181247: Determination as to whether prior approval is required for the erection of a new agricultural building to provide storage for machinery and farm equipment: Prior Approval Not Required
- Ref. No: 20251030: Change of use of land to the keeping of horses, erection of a stable building and a hay barn and creation of sand-school: Refused

4 Proposed Development

- 4.1 This application seeks full planning permission for the following proposed development:

Change of use of land to the keeping of horses, erection of Stables and a Sand-school.

- 4.2 The application is a resubmission following the refusal of planning permission relating to application 20251030, which sought permission for 'Change of use of land to the keeping of horses, erection of a stable building and a hay barn and creation of sand-school.'
- 4.3 It is now proposed to erect just a stable building and sand school on the existing paddock. The existing landscaping around the perimeter of the site would be retained as previously proposed.
- 4.4 The stable building has been re-located to a position along and parallel with the northern site boundary. It is now located on the lower part of the site than previously. It is proposed to be 30m x 12m and approximately 4.2m high to the ridge and between 2.3 and 3m to eaves level due to varying levels. It would comprise 12 stables a tack room and horse wash-down area. External materials

would be a corrugated green profiled metal roof with ventilated profiled sheeting for the walls (green) above a brickwork plinth.

- 4.5 The sand-school is now to be located immediately to the south of the stable building and would be 40m x 25m. it would be fenced with a timber post and rail fence. No lighting would be provided for the sand-school.
- 4.6 A small hardstanding area and parking for four cars would be provided access from the farm access road. The access and hardstanding/parking spaces would be surfaced in rolled stone. A manure store is shown located adjacent to the stable building.
- 4.7 The site is bounded to the north and east by existing landscaping/hedging which will be reinforced and enhanced as required to meet Biodiversity Net Gain requirements. Approximately 1.15ha of the arable field to the north of the site will be sown with species rich herb and grassland mix and maintained to provide the required BNG 10%.
- 4.8 The stables and sand-school will be available for use on a livery basis and the income will be used to diversify the Farm's business. The business would be run by the applicant and his immediate family. They will be able to provide appropriate security and care for the stabled horses, given the proximity of their house to the site.
- 4.9 Although the applicant and family do not live on a farm in the traditional sense they farm just over 400 acres within a mile of the application site. They have a building and land at Queens Farm, over 200 acres of marsh which historically belonged to East Court Farm, although the farmyard has been sold. Around 90 acres of arable land to the North and East of the Gravesend Crematorium. In total 4 different landlords. They have cattle, sheep, arable and grassland/marshland some of which is used for hay production. All of this is rented on Farm Business Tenancies, currently with the longest 5 years and the least a yearly arrangement. There is no long-term security on any of the land and with the uncertainties facing farming, the applicant and family are looking for a diversification that is their own to provide some stability. They do not want to stop farming, just a diversification project that provides a better financial footing.
- 4.10 In general, it is anticipated that access hours to the facility would be 0700-1900 hours. Early morning activity would mainly be the applicant's partner (who would largely run the business) turning horses out to graze. In winter activity would cease earlier due to light, but in the summer people like to ride after work etc. Most activity on the site would generally take place after 9am.
- 4.11 Further land is owned to the North of the site, part of which has the BNG on which will be used for grazing. This is easily accessible from the proposed yard.

- 4.12 The applicant envisages 12 horses will be kept at the site, with some of the horses being owned by the applicant's partner and family. The only possible change would be if there was a grass livery only which didn't require a stable. The applicants are keen to prevent over-stocking, which would result in no grass and just mud. The applicant's partner has been involved in horses all her life and wants a professional looking and feeling yard.
- 4.13 A muck heap would be provided within the site as shown on the submitted plans. The applicant advises that their farming activities produce muck on the farm, any produced from the stables will be removed and added to these heaps, as and when required, and spread on the arable land.
- 4.14 The majority of site would remain permeable. The rainwater from the stable building would be harvested and used for drinking etc. following filtering.
- 4.15 A drain outside the main door to the stables would be provided to catch water from washing etc. into a tank/package treatment plant which would also be connected to the muck heap run off. The applicant advises that in their experience because the bedding is still fairly dry when added to the muck heap run off is minimal. The sand-school would have proper drainage when built as per guidelines.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

- 5.3 Paragraph 39 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 It is understood that the Development Plan for the area within which the Site is located comprises the following documents:
- Core Strategy 2014
 - Saved Policies Local Plan First Review 1994
- 5.6 In the Development Plan, the following policies are considered most relevant in the determination of this application:

Core Strategy

- CS01 Sustainable Development
- CS02 Scale and Location of New Development
- CS12 Green Infrastructure
- CS13 Green Space, Sport and Recreation
- CS18 Climate Change
- CS19 Development and Design Principles
- CS20 Heritage and the Historic Environment

Gravesham Local Plan First Review (Saved Policies) 1994

- TC2 Policy for Listed Buildings
- C17 Horse-riding and Stables
- T1 Impact of development on the highway network
- P3 Vehicle Parking Standards

Other Material Considerations

The Framework (NPPF 2024) as amended February 2025

- 5.7 In summary, the following paragraphs are considered most relevant as additional material considerations in the determination of this application:
- | | |
|-----------------------|--|
| 7-8 | Achieving sustainable development |
| 11-12 | Decision making & presumption in favour |
| 39 | Positive and creative decision making |
| 88-89 | Supporting a prosperous rural economy |
| 103, 105 | Open space and recreation |
| 116 | Highway safety and capacity |
| 131, 135 & 139 | Design |
| 142-143, 153-154 | Green Belt |
| 187, 189-190, 192-193 | Natural Environment and Biodiversity |
| 202, 207-210, 212-215 | Conserving and Enhancing the Historic Environment. |
- 5.8 The Government is currently consulting on proposed changes to the Framework.
- 5.9 Proposed Policy E4 covers rural business development and emphasises that in applying policy E2, the sustainable growth of businesses in rural areas should be supported, including through:
- 'b. The development and diversification of agricultural and other land-based businesses;*
- c. Facilities to support rural leisure and tourism and measures to retain and expand accessible local shops and services;'*

6 Planning Assessment

Key Issues

- 6.1 The following are considered to be the key issues in the assessment of this application:
- Green Belt considerations
 - Impact on character of the surrounding area and residential amenity
 - Impact on designated Heritage Assets
 - Impact on Ecology and Biodiversity
- 6.2 This statement should be read in conjunction with the accompanying Heritage Statement.
- 6.3 Planning permission was refused for application 20251030 on the following two grounds
- 1. The proposal would fail to preserve the openness of the site and would conflict with one of the Green Belt purposes to safeguard against countryside encroachment. As a result, the*

proposal would not meet the paragraph 154 exception criteria set out in the National Planning Policy Framework 2024, and the Green Belt would be harmed. Any such harm to the Green Belt is given substantial weight. There are no special circumstances that would outweigh this harm to the Green Belt by reason of inappropriateness. The proposal would therefore be contrary to the relevant requirements of Section 13 of the National Planning Policy Framework 2024, including paragraphs 142, 143, 153 and 154, and Policy CS02 of the Gravesham Local Plan Core Strategy 2014.

2. The scale and extent of the proposal will result in a significant spread of development across this open and undeveloped countryside site, and given the open farmland surroundings, will have a clear visual impact that will introduce obtrusive features into the rural landscape. This would be contrary to the landscape guidelines for the Higham Arable Farmlands Landscape Character Area set out in the Gravesham Landscape Character Assessment 2009 and would therefore have an unacceptable impact on the landscape. The proposal would therefore be contrary to the requirements of Paragraphs 135 and 187 of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

- 6.4 In preparing this revised application, the applicant has sought to reduce the scale of the proposed development and reduce the impact of it on the openness of the Green Belt and also the alleged obtrusiveness in the landscape.

Green Belt considerations

- 6.5 The site is located in open countryside within the Green Belt and is otherwise undesignated land.
- 6.6 Notwithstanding the Council's previous conclusions, it remains the applicant's view that the proposed development is potentially appropriate development under paragraph 154b) of the Framework as it comprises appropriate facilities in connection with open air recreational use (horse riding and exercise). Whether development is appropriate is subject to the provision that it preserves the openness of the Green Belt and does not conflict with the purposes of including land with the Green Belt. The change of use of the land from agriculture to the exercising and keeping of horses is appropriate development by virtue of para 154h)v. of the Framework, if similar conditions to those set out under 154b) are met.

Conflict with the purposes of the Green Belt

- 6.7 There are five purposes for including land within a Green Belt and these are set out at paragraph 143 of the Framework. The proposed development has been assessed against these as follows;

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

The proposed development will not lead to the outward eastwards expansion of Gravesend towards the settlements of Higham and Shorne.

b) to prevent neighbouring towns merging into one another;

- *The proposed development will not lead to neighbouring towns (Gravesend and Medway Towns) merging into one another.*

c) to assist in safeguarding the countryside from encroachment;

- *It is recognised that the development is in a countryside location and that a currently undeveloped grazing paddock would be partially developed as a result of the development.*
- *However; this revised application has significantly reduced the proposed extent of built development through the deletion of the hay barn that was previously proposed. In addition, the stable building has been re-sited onto a lower area of the site and the sand-school re-located behind it, which has consolidated built-form on the site. The extent of hardstanding has also been reduced.*
- *The ridge of the stable building will be lower than that of the main farmhouse and the adjacent large barns within the Farmstead.*
- *Given that the proposed stable building is now to be located closer to the retained hedgerow and trees along the PROW and is still to be clad externally in green sheeting it is considered that the proposed development will not result in a significant and noticeable visual encroachment into the countryside.*
- *It will not appear as a discordant or alien feature when seen in the context of the existing buildings within the farmstead and surrounding area, for example, the recently erected large barn at New Green Farm to the east of the site which is significantly larger but of similar external materials.*
- *It should also be noted and recognised that the proposed use is associated with an appropriate recreational use in the countryside.*

d) to preserve the setting and special character of historic towns; and

The application site does not affect the setting of Gravesend and its Heritage.

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

The application proposals are of a use and type that are not suited to an urban location and are connected with open air recreational use in the countryside.

- 6.8 It is contended that the revised proposals do not conflict with the purposes of including the land within a Green Belt.

Openness

- 6.9 The Courts have held that consideration of Openness has two aspects, visual and spatial.

- 6.10 In a visual sense particularly when viewed at a greater distance from Lower Road and Green Farm Lane, the proposed building would be seen in the context of

existing development. Visually the farmhouse and the large agricultural buildings to the north and north east are the most prominent features in the landscape. It is considered that the revised proposals better fit into and utilise the topography of the site to minimise any visual intrusion given that the stables will now be located on the lowest part of the Site, where levels are significantly lower than the Farmhouse and other buildings. In terms of its design and external appearance, the development is not out of character with and is typical of many such developments in the Green Belt and countryside in general.

- 6.11 The revised proposals have improved and better consolidated the development within the Site and reduced its spread to address the objection of the Council expressed on the previous application. An advantage of the consolidation now proposed is that the increased separation has resulted in an improved separation from and as a result an enhanced setting for the nearby designated heritage assets. The applicant contends that the facilities will, however, remain visually associated with existing farmstead and adjacent development and not appear as a separate unrelated development. It is important to note that existing boundary planting that provides a functional and effective visual screen to the paddock will still be retained and will not be affected by the development and indeed it can be enhanced through the additional tree planting and landscaping the scheme proposes.
- 6.12 It is considered that the proposed development which, in its currently proposed revised form, has sought to address the Council's previous concerns through the removal of the hay barn and re-location of proposed buildings and sand-school and reduction in the developed areas would not have an unacceptable visual impact on openness.
- 6.13 In considering the spatial aspect of openness it is clear that a currently open field would be partially developed. In that spatial sense, the development would therefore affect openness. This new application has removed the previously proposed hay barn and has also re-examined the extent of other hardstandings.
- 6.14 Even though the field would now be partially developed, in the context of the surrounding area of Green Belt that the site sits within, the prevailing character, form and openness of the area would not be unacceptably impacted. The key elements of the landscape in the vicinity of the site are the large open arable fields as well as orchards, along the lower slopes of the Shorne Ridge leading towards the marshes to the north. The proposed development will not impact on that prevailing character.

Character and residential amenity

- 6.15 The proposed development will not result in any impact on the residential amenity of the occupiers of nearby dwellings which include the applicant and his family. The closest are Green Farm House, 1 and 2 Green Farm Cottages and at The Granary (approximately 110m). These distances are considered acceptable. The proposed activity associated with the development is not inherently noise

generating and any proposed bedding/manure storage facility can be sited and designed to also ensure no issues with aroma.

- 6.16 Horse riding and associated development is typical of many countryside locations and stable blocks are not unusual or alien forms of development in the countryside. From the wider area the proposed development has been designed to ensure any visual impact is minimised and it is noted that the development will still be seen in the context of the existing farmstead and in particular the two largest agricultural buildings on the site.
- 6.17 It is not considered that the development would have such an adverse impact on the character and appearance of the surrounding area as to warrant permission being withheld.

Impact on Heritage Assets

- 6.18 There are two designated Heritage Assets located close to the application site. These are a former Granary (now in residential use) which is located on the western side of the farmstead and Green Farm House which is located in the heart of the farmstead complex.
- 6.19 The accompanying Heritage Statement assess the significance of the assets and the impact of the development in terms of this identified significance.
- 6.20 It is considered that the proposed development will have little or no impact on the significance of or the setting of the Granary.
- 6.21 In terms of Green Farm House it is concluded that less than substantial harm to the setting of the building will arise from the development. This harm is considered to be at the lower end of any scale of harm. There is public benefit in encouraging and diversifying the rural economy in accordance with advice and policy elsewhere in the Framework.
- 6.22 It is noted and acknowledged that no objections were raised to the previous application on Heritage Impact grounds. The reduction in built form and the changes to site layout are beneficial to their setting and it is considered that there continue to be no grounds to withhold permission in terms of the impact of the development on designated heritage assets.

Impact on Ecology and Biodiversity

- 6.23 The application is accompanied by appropriate ecological and habitat baseline assessments. The development is not exempt from Biodiversity Net Gain (BNG) requirements and we have worked with the applicant and the appointed ecologist to address BNG requirements as required a BNG Metric has also been submitted alongside the application.
- 6.24 The ecological appraisals have indicated that the site is not suitable for Great Crested Newts and that habitat is unlikely to be affected. Appropriate mitigation

measures can be put in place prior to and during construction to ensure there is no unacceptable impact on reptiles.

6.25 In terms of BNG the existing baseline habitat has been assessed. The habitat is predominantly comprised of modified grassland. Proposed mitigation and enhancement works are as follows.

- Sowing 1.15ha of currently arable land with a with species rich herb and grassland mix, maintained to provide the required BNG 10%.

These works will ensure that at least the appropriate 10% gain is achieved through measures on adjacent land under the control of the applicant.

6.26 Whilst located within 6km of the Thames Estuary and Marshes SPA and Ramsar sites, the proposed development does not fall within the category of development that is the subject of the SAMMS regime that has been drawn up and is operated by Natural England in conjunction with the affected North Kent Authorities including Gravesham Borough. The SAMMS scheme is designed to mitigate and reduce increasingly damaging recreational pressure on these protected areas that arises primarily from new residential and similar development. Furthermore, as a proposed outdoor recreational use it can be argued that the development would also play a part in serving to reduce access pressures on the protected areas. It is not considered that an Appropriate Assessment under the Habitat Regulations 2017 is required for these proposals.

Very Special Circumstances

6.27 In the event that the Council consider that the development is inappropriate, it will be necessary to consider whether there are any Very Special Circumstances that clearly outweigh the potential harm to the Green Belt arising from inappropriateness to the Green Belt and any other harm from the development.

6.28 The development will assist in supporting and diversifying the farm's income. Support for a prosperous rural economy is key to advice in the Framework at paragraphs 88 and 89 in particular.

6.29 Paragraph 88 encourages the sustainable growth and expansion of all types of businesses in rural areas including through well-designed new buildings as well as the development and diversification of agricultural and other land-based rural businesses.

6.30 There is also a recognition (paragraph 89) that sites to meet the needs of rural businesses and communities in rural areas may need to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport.

6.31 This supportive approach is enhanced in the published proposed amendments to the Framework, reflecting the Government's continuing desire for continued support for the farming industry and the rural economy.

- 6.32 There will also be no requirement for additional residential accommodation of any form to be connected with the proposed development for the purposes of management and security, given the fact that the applicant and family live adjacent to the site and will be on-hand to undertake these duties.

7 Conclusions

- 7.1 The proposed development is in support of appropriate open-air recreational uses in the Countryside which are also appropriate in the Green Belt.
- 7.2 The applicant has carefully considered the Council's previous concerns and has reduced the physical extent of the proposed development through the removal of the hay-barn and a reduction in hardstanding. The resiting of the stable building to the lower part of the site will ensure it assimilates into the landscape better and the revised location (behind the stable building) of the sand-school will further mitigate any visual impact. Additional landscaping is proposed.
- 7.3 The proposals will support and diversify the existing farming enterprise which is fully in accordance with the existing and emerging Framework.
- 7.4 The changes made to the proposals do not result in conflict with Green Belt purposes and will not result in a diminution of the role of the Green Belt within the Borough when considered as a whole. There will still be some impact on openness but this should be balanced against the acceptability of the principle of the development being for recreational use. Given the changes made since the original application it is contended that the right balance now exists.
- 7.5 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority and it is respectfully requested that this submission and the revised proposals are approved.