



Design & Access Statement inc. Heritage Statement

Householder Planning Application
Demolition and Replacement of Existing Garage, Workshop
and Machinery Store and Associated Works

*Boughurst Farm, Leywood Road,
Meopham, Gravesend,
Kent, DA13 0UD*

SEPTEMBER 2023

(This document should be printed on A3)

1.0 INTRODUCTION

1.1 This Design & Access Statement has been prepared by **RJP Architects** and **Hughes Town Planning Consultancy** in support of a householder application for planning permission for the demolition and replacement of existing garage, workshop, and machinery store, in use for ancillary purposes in connection with the host dwelling, together with the formation of turning and visitor parking area (“the Proposed Development”) on site at Boughurst Farm, Leywood Road, Meopham, Gravesend, Kent, DA13 0UD (“the Application Site”).

1.2 This Design & Access Statement should be read in conjunction with the following submitted documents and plans: -

Documents

- Application Form (inc. Certificate A)
- Preliminary Roost Assessment Survey (August 2023)

Plans

- Site Location Plan (SP_01)
- Existing Block Plan (SP_02)
- Proposed Block Plan (SP_03 Rev A)
- Existing Elevations & Floor Plan (EX_01)
- Existing South Facing Site Context Elevation (EX_05)
- Proposed Elevations & Floor Plan (E_11 Rev A)
- Proposed Roof Plan (E_12 Rev A)
- Proposed South Facing Site Context Elevation (E_15 Rev A)
- Illustrative Partial Site Plan (Proposed) (P_01 Rev A)
- Illustrative Site Section (Proposed) (S_01 Rev A)

Background

1.3 Gravesham Borough Council (“the Council”) in its capacity as Local Planning Authority (“LPA”) refused planning permission on **13th June 2023** for *Demolition of existing workshop and storage building and construction of a new car port, workshop and storage building with associated landscaping, turning and visitor parking areas* under application reference **20230393** (“the Refused Scheme”).

1.4 Permission was refused for the following reasons:

1. *The proposed replacement outbuilding, by virtue of its excessive size, is an inappropriate and harmful development in the Green Belt that would be contrary to the requirements of Policy CS02 of the Gravesham Local Plan Core Strategy 2014, saved Policy C13 of the Gravesham Local Plan 1994 and paragraphs 147, 148, 149 of the National Planning Policy Framework 2021.*
2. *The proposed replacement outbuilding, by virtue of its excessive size, would fail to conserve the rural landscape context of this site within the Kent Downs Area of Outstanding Natural Beauty and the Luddesdown Downs Landscape Character Area. As such, the proposal would fail to comply with the requirements of Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014, and paragraphs 130, 174 and 176 of the National Planning Policy Framework 2021.*
3. *The proposed outbuilding, by virtue of its excessive size, would adversely affect the setting of the original Grade II Listed Gatehouse and Farmhouse buildings on the site. As such, the proposal would fail to comply with the requirements of Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014, saved Policy TC2 of the Gravesham Local Plan 1994 and paragraphs 190 and 197 of the National Planning Policy Framework 2021.*

1.5 The application as now submitted (“the Revised Scheme”) has sought to address each of these reasons for refusal and to justify the amended proposals having regard to the development plan and other material considerations. The clear objective of the Applicants and their design team is to address the Council’s concerns with the Refused Scheme in order that planning permission can now be granted for the Revised Scheme.



Planning History

1.6 The planning history for the site is set out in the table below.

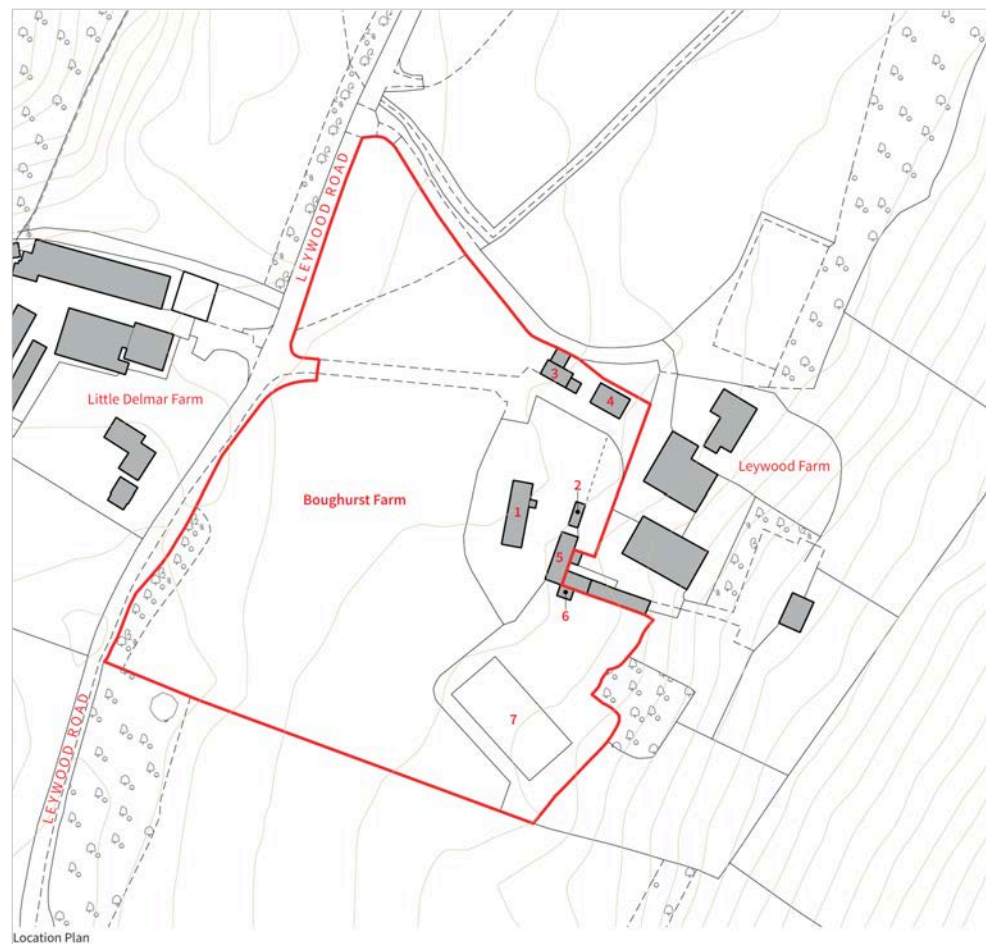
Reference	Description	Decision	Decision Date
20210920	Application for Listed Building Consent for conversion of existing outbuilding to two bedroom all year round holiday let.	Withdrawn	22.02.2022
20210919	Conversion existing outbuilding to two bedroom all year round holiday let.	Withdrawn	22.02.2022
20171004	Application for the approval of condition 2 attached to planning permission reference no. 20170711 relating to details of the extractor fan.	Approval	18.01.2018
20170711	Application for Listed Building Consent for the retention of the en-suite shower room and cupboard in the fourth bedroom at first floor level.	Permission	24.08.2017
20120667	Application for Listed Building Consent for the installation of secondary glazing to all windows at first and second floor levels.	Permission	19.09.2012
19980461	The installation of a Yorkstar 24 oil fired condensing boiler in lobby leading to ground floor toilet, with a rear exit external flue.	Permission	25.09.1998
19860199	Use of land as residential garden and erection of 2.75 metre high perimeter fence to tennis court	Permission	27.06.1986

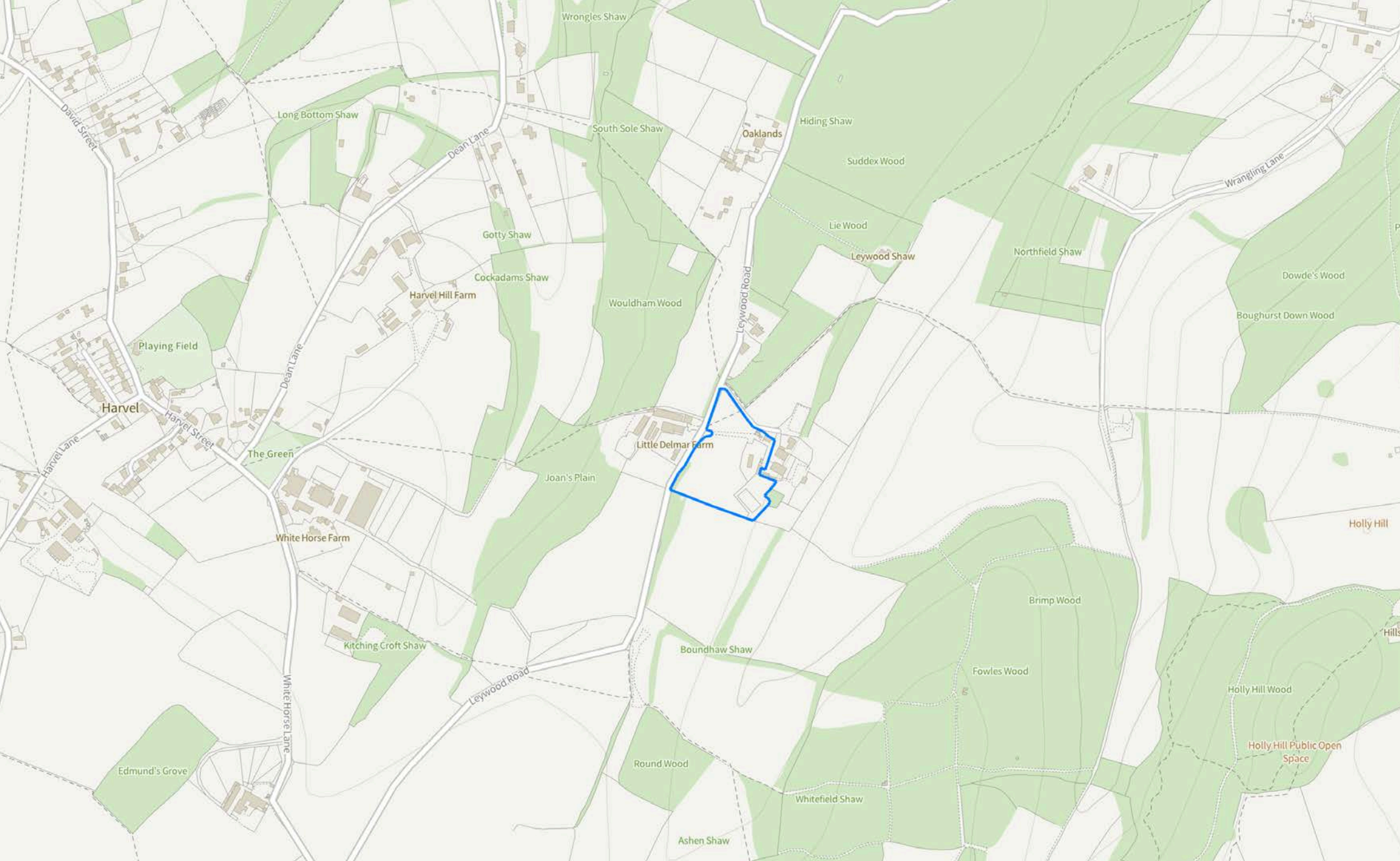


2.0 THE SITE & SURROUNDING AREA

PHYSICAL AND SPATIAL CONTEXT

- 2.1 The Application Site comprises an historic farmstead known as 'Boughurst Farm' located in the West Kent Downs AONB. It is located in the rural hinterland of Meopham, falling within the Parish of Luddesdown and within the administrative jurisdiction of Gravesham Borough Council. The local area is predominantly rural, characterised by a rich agricultural patchwork of fields and rolling valleys, with small hamlets and occasional farm settlements, including Boughurst Farm and the adjacent Little Delmar Farm (to the west of Leywood Road) and Leywood Farm (to the east of the Application Site).
- 2.2 Albeit no longer operating as a working farm, Boughurst Farm has substantial grounds extending to approximately 4.4 acres and consisting of the host dwelling 'Boughurst Farmhouse' and a number of ancillary outbuildings. The host property is a Wealden Hall House and is grade II listed, its oldest part dating from the 15th Century.
- 2.3 The farmhouse and outbuildings to the east of the site (known as 'Leywood Farm') are in separate ownership but once formed part of Boughurst Farm. Whilst the Application Site is delineated from the adjacent site by fences and walls, the proximity of the adjacent utilitarian farm buildings is such that they are clearly visible when stood within the Application Site.
- 2.4 The key buildings and structures within the Application Site are identified on the plan opposite:
- Boughurst Farmhouse
 - Utility
 - Recreation room / parking below
 - Workshop / garden machinery store
 - Storage
 - Lean to
 - Tennis Court





CONSTRAINTS AND DESIGNATIONS

- 2.5 The Application Site is located outside a defined settlement boundary and within the open countryside. The site also lies within the Kent Downs Area of Outstanding Natural Beauty (AONB) and within Green Belt. The host dwelling, *Boughurst Farmhouse*, is grade II listed.

FLOOD RISK

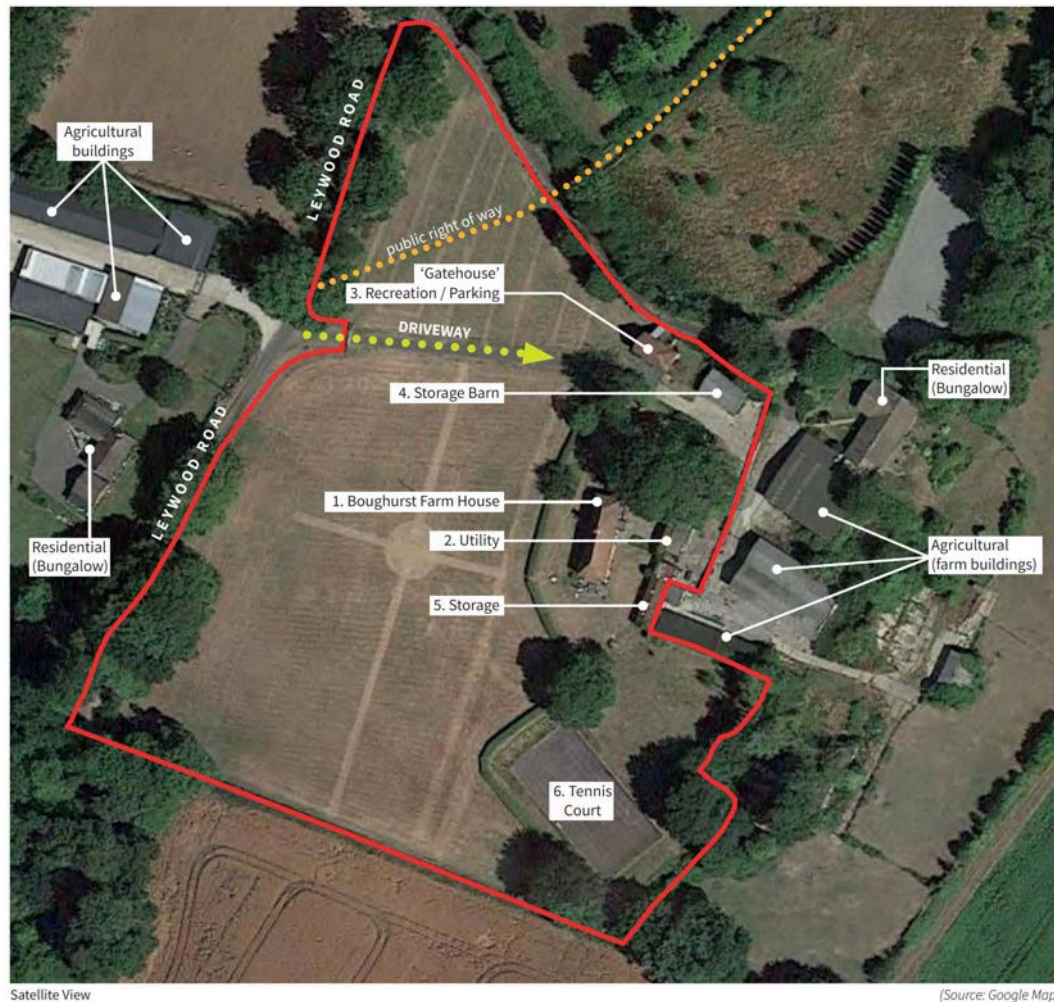
- 2.6 No part of the site or the immediately surrounding area lie within a fluvial flood risk zone or an area at risk of surface water flooding.

PUBLIC RIGHTS OF WAY

- 2.7 Leywood Road to the west of the site is a public highway. There are no footways along this stretch of road. The Wealden Way public footpath traverses the north-west corner of the site.

BUILDING TO BE REPLACED

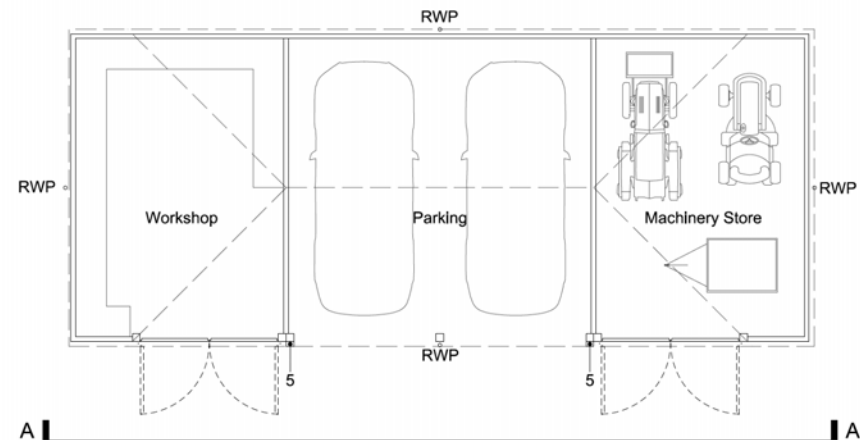
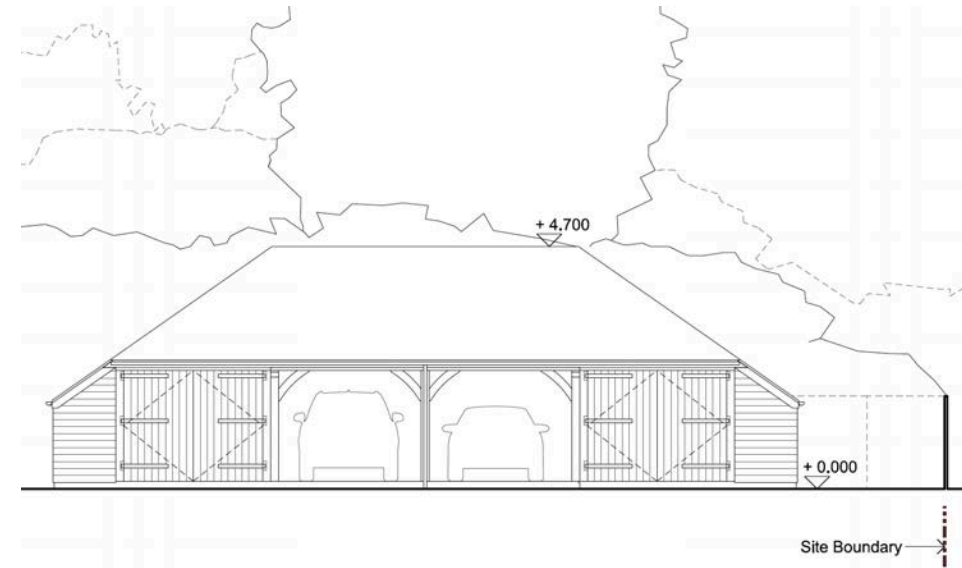
- 2.8 The building to be demolished and replaced (referred to on the aerial photograph opposite as 'Storage Barn') comprises a corrugated asbestos sheeted building of concrete construction. The building is situated within the north-east corner of the site, visually separated from the listed farmhouse by intervening trees and vegetation.
- 2.9 The former barn is in ancillary use to the host dwelling for garaging, workshop and machinery store and accessed via the long private driveway off Leywood Road. The 'Gatehouse', which is situated a short distance to the west of the barn, is deemed a curtilage listed building by virtue of its age and historical association with the farmstead. The building to be replaced is of no architectural or historic merit, comprising a *relatively* modern utilitarian building constructed for functional purposes in association with the former farm. Photographs of the building to be replaced that were taken within the past two months or so are included below for information purposes.





3.0 THE PROPOSALS

- 3.1 The application seeks full planning permission for the demolition and replacement of existing garage, workshop, and machinery store, in use for ancillary residential purposes in connection with the host dwelling, together with the formation of a turning and visitor parking area.
- 3.2 The proposed new (replacement) building will be located in the north-eastern corner of the site, in place of the existing building.
- 3.3 The proposed new building is rectangular in shape and single storey with a hipped and part catslide roof. It will have an oak frame with a brick plinth, black feather-edged horizontal weatherboarding, timber doors, four bays and a clay tiled roof. The building will measure approximately 14.4m long x 6m wide and 4.7m high to the ridge.
- 3.4 The proposal also involves the formation of a new turning area immediately in front of the new building with space for visitor parking to enable vehicles to enter and exit the site in a forward gear.



1 Proposed Floor Plan

4.0 PLANNING POLICY FRAMEWORK

- 4.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies of the statutory development plan for Gravesham are listed below.

THE DEVELOPMENT PLAN

Gravesham Local Plan: Core Strategy (2014)

- Policy CS01 (Sustainable Development)
- Policy CS02 (Scale and Distribution of Development)
- Policy CS11 (Transport)
- Policy CS12 (Green Infrastructure)
- Policy CS18 (Climate Change)
- Policy CS19 (Development and Design Principles)
- Policy CS20 (Heritage and the Historic Environment)

Gravesham Local Plan: First Review (1994) (Saved Policies)

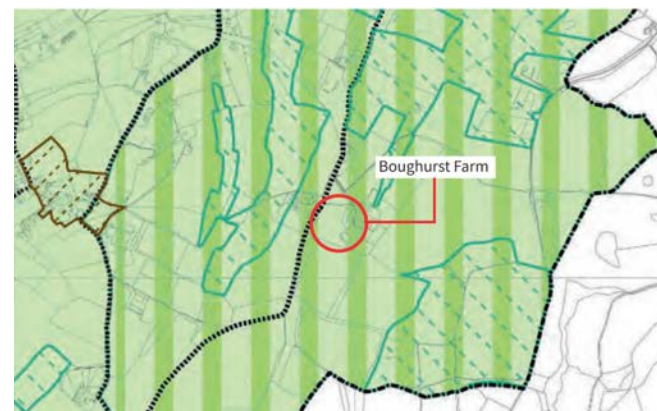
- Policy TC2 (Listed Buildings)
- Policy C13 (Extensions to Dwellings in the Countryside)
- Policy P3 (Vehicle Parking Standards)

OTHER MATERIAL CONSIDERATIONS

- 4.2 The following are relevant material considerations:
- The National Planning Policy Framework (2021)
 - SPG2 - Residential Layout Guidelines (2020)
 - SPG4 - KCC Parking Standards (2006)
 - SPD - Householder Extensions/Alterations Design Guide (2021)
 - Gravesham Landscape Character Assessment (2009)
 - Kent Downs AONB Management Plan 2021-2026
 - The Setting of Heritage Assets by Historic England (2017)

Policies Map

- 4.3 For the purposes of the development plan, the Application Site is located outside a defined settlement boundary and within the open countryside. The site also lies within the Kent Downs AONB and within Green Belt. The host dwelling, *Boughurst Farmhouse*, is grade II listed. The *Gatehouse* is curtilage listed.



5.0 CONSIDERATION OF MAIN ISSUES

5.1 The Proposed Development involves the demolition and replacement of existing garage, workshop, and machinery store, in use for ancillary residential purposes in connection with the host dwelling, together with the formation of a turning and visitor parking area.

5.2 In the light of the scale and nature of the proposals, and having regard to the reasons for refusal of the Refused Scheme, the **main issues** for consideration are as follows: -

- i. *The effect of the proposed development on the Green Belt;*
- ii. *Effect upon character and appearance of the AONB;*
- iii. *Heritage effects; and*
- iv. *Ecology effects.*

MAIN ISSUES

Green Belt

5.3 Paragraph 137 of the Framework (2021) 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. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and,
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

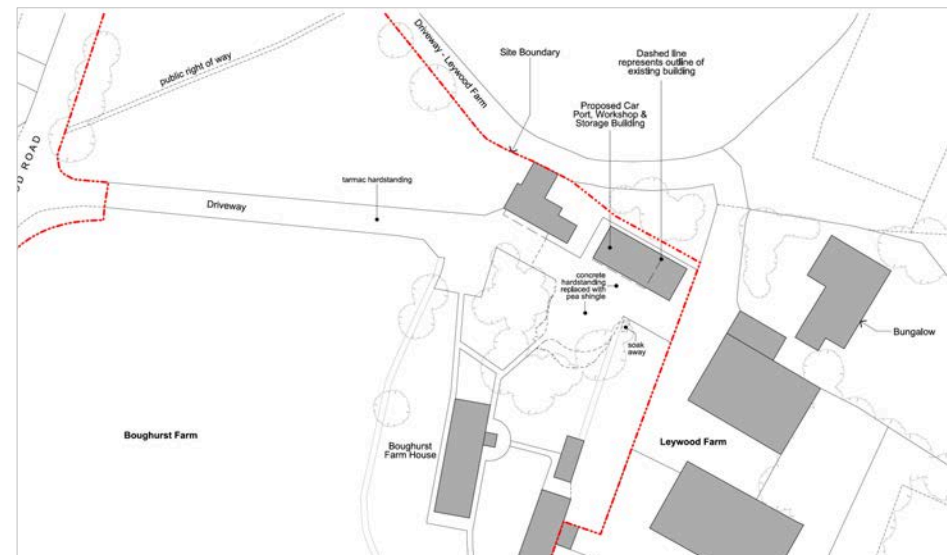
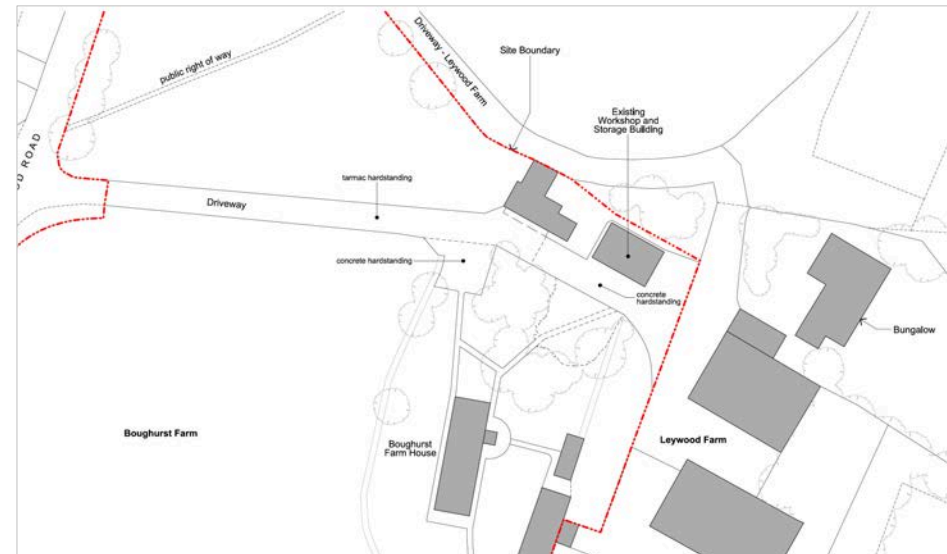
5.4 To this end, the construction of new buildings in Green Belt should be regarded as inappropriate development (NPPF Para 149). There are however exceptions. These include (criterion d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

5.5 At the local level, Core Strategy Policy CS02 (Scale and Distribution of Development) states that development outside of settlements will be supported where it is compatible with national policies for protecting the Green Belt and other policies in the development plan. Local Plan Policy C13 (Extension to Dwellings in the Countryside) states that proposals for domestic garages and for other residential outbuildings will be considered on their individual merits but will be required to be well designed, discreetly sited and subservient to the scale of the main dwelling on the plot, having regard to the policy objectives to maintain the open character of the Green Belt in Gravesham (as set out in paragraph 9.35 of the Local Plan 1994).

5.6 The Proposed Development comprises the replacement of an existing outbuilding in use for ancillary residential purposes and its replacement with a new outbuilding also in use for ancillary residential purposes. Having regard to the nature of the proposal, criterion d) of paragraph 149 of the Framework is directly relevant as this specifically relates to the replacement of an existing building.

5.7 Having regard to the above, provided the replacement building is not materially larger than the one it replaces, the proposal comprises an appropriate form of development in Green Belt.

- 5.8 In the above connection, it is important to clarify that there is a difference between replacement buildings that are 'larger' and those that are 'materially larger' in Green Belt policy terms. The precise wording of criterion (d) allows for replacement buildings that are larger. It is the point at which a replacement building is 'materially' larger that proposals may fall foul of the policy provision. It is also important to note that there is no definition of 'materially larger' either in statute, regulation, the development plan, or in national planning policy guidance.
- 5.9 At the local level, criterion vii) of Policy C13 is also directly relevant. As explained above, the objective for the policy is to maintain the open character of the Green Belt. To this end, the policy recognises that each application will be considered on its own merits and consideration is required to be given to whether the proposal is: i) well designed, ii) discreetly sited, and iii) subservient to the scale of the main dwelling on the plot.
- 5.10 The existing outbuilding measures 10m long x 6.6m wide (66m²). The height to eaves is 2.4m and to ridge is 3.6m. In comparison, the proposed outbuilding would measure 14.4m long x 6m wide (86m²). The height to eaves would be 2.5m (catslide ends at 1.7m) and to ridge is 4.7m.
- 5.11 The proposed replacement building is therefore 4.4m longer and 0.6m shorter than the existing building and it would be 1.1m taller to ridge with a similar eaves height. In terms of total floor area, the proposed building represents an increase of 20m², representing a 30% increase in floor area.
- 5.12 This is a substantial reduction in overall size and scale from the Refused Scheme.
- 5.13 In design terms, the proposed new building is rectangular in shape and single storey with a hipped and part catslide roof. It will have an oak frame with a brick plinth, black feather-edged horizontal weatherboarding, timber doors, four bays and a clay tiled roof.



- 5.14 The proposed new building will sit substantially within the footprint of the existing building. The use of timber as both a construction and external material is key to the building's subservience to the host dwelling and adjacent Gatehouse, which are a combination of brick, stone, Kent peg tiles and timber. So too is the proposed building's single storey height, which contrasts with the two-storey dwelling and Gatehouse. The proposed outbuilding has the appearance of an outbuilding which is ancillary to the host dwelling. It does not compete with it. The outbuilding is of a design and materiality that is appropriate for its use and for this location. Timber clad buildings are a feature of the Kent countryside. It is well-designed and sensitive to the defining characteristics of the site and surrounding area.
- 5.15 In the above connection, the LPA raised no particular issue with the design of the Refused Scheme. Their concerns related specifically to the building's size, which according to our calculations was double that of the existing building. The outbuilding as previously proposed had a floor area of 127m² which equated to a 92% increase in floor area.¹
- 5.16 In the above connection, the amended proposal has been significantly reduced in size to directly address the Council's concerns with the Refused Scheme. There is a need for more space within the building to meet the needs of the Applicants who reside in Boughurst Farmhouse and the scheme as now submitted provides the right balance between meeting the practical needs of the Applicants on the one hand, whilst not being materially larger than the existing building on the other.
- 5.17 Having regard to the objectives of Local Plan Policy C13, the proposed outbuilding is well designed, discreetly sited, and subservient in scale and appearance to the host dwelling and adjacent Gatehouse. For these reasons, whilst the replacement building is larger than the existing building, it is not materially larger, having regard to

associated considerations of design, siting, and relationship to adjoining buildings.

- 5.18 Given the nature of the outbuilding within the garden to the host dwelling, and its location to the rear of the Gatehouse, which assists in screening the building in views from Leywood Road, the private driveway to Boughurst Farmhouse and from the public footpath, the Revised Scheme would maintain the open character of the Green Belt in this part of Meopham and it would have no detrimental effect on the five purposes that the Green Belt serves.
- 5.19 For all of the aforementioned reasons, the proposal accords with the Government's policies on protecting the Green Belt from inappropriate forms of development as set out in the Framework and there is no conflict with the objectives of Policy C13 (Extension to Dwellings in the Countryside) of the Gravesham Local Plan 1994.

Character and Appearance of AONB

- 5.20 Section 15 of the Framework highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Great weight shall be given to conserving landscape and scenic beauty in AONB's, which have the highest status of protection in relation to landscape and scenic beauty.²
- 5.21 Core Strategy Policy CS12 (Green Infrastructure) states that the overall landscape character and valued landscapes within the Borough will be conserved, restored, and enhanced, and proposals should take account of the Gravesham Landscape Character Assessment 2009. Core Strategy Policy CS19 (Development and Design Principles) requires proposals to conserve and enhance the character of the local built and natural environment, and to integrate well with the surrounding area.

¹ The Officer's Delegated Report incorrectly stated a figure of 49% although it is assumed that the proposal was determined on the basis of the correct figure of a 92% increase in floor area.

² Paragraph 176 of the NPPF 2021

- 5.22 Reflective of NPPF Paragraph 176, Principle SD2 of the Kent Downs AONB Management Plan (2021-2026) recognises the need to conserve and enhance the local character, qualities, distinctiveness, and natural resources of the AONB; whilst Principle SD8 seeks to ensure that proposals do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting, and views to and from the AONB.
- 5.23 The Application Site is located within the Luddesdown Downs Landscape Character Area (LCA) which is defined by undulating topography with arable farmland and pasture, irregular field patterns, fields divided by native hedgerows and areas of native woodland that all contribute to the rural character of the area. The overall condition of the landscape is generally good, and its sensitivity high. The guidelines for the area focus on maintaining the character of sparse and distinctive built development and conserve small-scale farmsteads.
- 5.24 The host dwelling is approached via a single-track driveway that passes first through an open field before entering the domesticated part of the site. The host dwelling and associated outbuildings, including the Application Building, are set well back from the road and in part behind a mature evergreen hedgerow which defines the residential curtilage. From the driveway entrance, the host dwelling, Gatehouse and outbuilding to be replaced are visible. The Gatehouse and outbuilding are situated at the end of the straight driveway, with the host dwelling situated to the their south.
- 5.25 The proposed replacement building would be located predominantly within the footprint of the existing building, to be demolished. The building would continue to be located to the rear of the Gatehouse and partially screened in views from the private driveway and road behind the taller and closer Gatehouse. The replacement building would also continue to be viewed within the context of Leywood Farm to the rear (east) which accommodates a number of substantially larger-scale modern farm buildings.



Photomontage: View of Proposed Replacement Building from Driveway

- 5.26 The proposed replacement building would be visible from a short stretch of the public footpath which traverses the north-west corner of the site, as in the present case. This is demonstrated by the photomontage on the following page. However, these views would be both limited and fleeting as the closer and taller Gatehouse would continue to screen views of the proposed building from much of the public footpath. The proposed replacement building would not extend further forward (south) than the existing building or Gatehouse, with the additional floor area created by the new building being situated to the rear (east) of the existing building. Accordingly, the extended part of the building would be least visibly located and therefore least impacted in views from the public footpath and road.
- 5.27 Moreover, whilst the proposed replacement building would have a taller ridge height than the existing building, which would better reflect the roof pitches of the host dwelling and adjacent Gatehouse and enable traditional clay tiles to be hung, its sensitive design and careful use of external materials would ensure that it would successfully assimilate into the site and surrounding area.
- 5.28 The building would continue to be a functional component of the site, and it would conserve the character and appearance of the site, landscape character and the wider AONB environment. The building is sympathetic to the scale of the existing buildings on the site, and it would remain subservient to the larger host dwelling and Gatehouse. The proposed replacement building is therefore appropriate in scale in the context of the existing form, pattern and character of the site and landscape.
- 5.29 Having regard to the above, there would be no harmful impacts on the character and appearance of the site, local area or the wider AONB within which the site lies. The proposals therefore accord with the landscape objectives of paragraphs 130, 174 and 176 of the Framework, policies CS12 (Green Infrastructure) and CS19 (Development and Design Principles) of the Gravesham Core Strategy 2014, and Principles SD2 and SD8 of the AONB Management Plan (2021-2026).



Photomontage: View of Proposed Replacement Building from Footpath



Heritage

- 5.30 The Framework places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (NPPF Paragraph 197). This is echoed in policies CS19 (Development and Design Principles) and CS20 (Heritage and the Historic Environment) of the Core Strategy 2014 which state that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 (Listed Buildings) of the Local Plan 1994 sets out that for development affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building(s). Proposals must be sympathetic in terms of their massing, scale, appearance, and materiality.
- 5.31 The main house, 'Boughurst Farm' is a grade II listed building. The Gatehouse building immediately adjacent to the existing outbuilding to be replaced is a curtilage listed building.

Significance

Boughurst Farm House

- 5.32 The significance of the asset, Boughurst Farmhouse, lies mainly in its age, construction system and its original form as a medieval 'open hall' house, constructed in the 1400s. As has come to be expected with buildings of this age and type, it has been altered and extended since its construction, including having the open hall infilled by an upper floor. The external appearance has also been changed, but its origins as a hall house can still be seen, appreciated, and admired, particularly internally, but also externally in its form and setting in open landscape it faces onto.



- 5.33 The interests of the house are therefore mainly architectural and to some extent archaeological, due to the survival of original form, structure, and some materials, particularly those which evidence its time as an open hall and evolution - namely the structural form, blackened roof timbers and wattle and daub infill panels found in the roof.

The Gatehouse

- 5.34 The Gatehouse building is curtilage listed by virtue of its age and relationship with the farmhouse, but not listed in its own right. While interesting, the Gatehouse retains much less original fabric than the house. This is a functional building which has likely evolved to meet the requirements of the site occupants at the time, with attempts to repair and retain the building for ancillary uses. The interest in the gatehouse building is primarily architectural and in trying to ascertain the way in which the building has evolved.

The Setting / Site Layout

- 5.35 The site layout has changed significantly over time, particularly with respect to the location of the farmyard and the outbuildings, all of which pre-1900s (other than the Gatehouse) have been lost. The Kent County Council Historic Environment record lists the site as a 'post-medieval farmstead - a loose courtyard with significant loss of *original form (more than 50%)*.'
- 5.36 The existing driveway appears to match the location of the original track to the farm and is therefore unchanged, albeit now hard surfaced. The hop garden which fronted the house, later an orchard and now simply grassed, has continued to remain free of built structures, giving the house a sense of prominence in the landscape.
- 5.37 The historic layout to the east of the farmhouse whereby large barn structures formed two sides of a small courtyard with the house forming the third, was lost in the early 1900s with the removal of the barns. Following this, the mapping and historic photos suggest that

the farm-related buildings and activities were focused further east beyond the house, eventually with the addition of a new house (bungalow) and the farm being separated entirely from what is now known as 'Leywood Farm'. There are various modern agricultural buildings on both sites which are of no historical significance.

Impacts

- 5.38 The existing outbuilding to be replaced is of no architectural or historic interest and the reasons for refusal relating to the Refused Scheme raised no concern over the principle of its demolition and replacement.
- 5.39 The existing outbuilding is of utilitarian appearance and nondescript. It plays no positive role in the setting of the historic farmstead; indeed we would go so far as to say that it is a detracting element in the setting of the listed buildings.
- 5.40 Conversely, the proposed replacement building is of a more appropriate design and appearance, located on the footprint of the existing building, and its use of materials assist in maintaining a subservient quality in relation to the host dwelling and Gatehouse.
- 5.41 The significant reduction in the proposed replacement building's size and scale compared to the Refused Scheme will ensure that the surrounding buildings remain the dominant force and it would not compete with the adjacent listed and curtilage listed buildings.
- 5.42 In the light of the above, it is submitted that the proposed development would in some respects preserve and in other respects enhance the character and appearance of the setting of the adjacent listed and curtilage listed buildings. There would be no harm to heritage assets and for these reasons the proposals would accord with the objectives of the Framework and development plan policies CS19 (Development and Design Principles), CS20 (Heritage and the Historic Environment) and TC2 (Listed Buildings) as they relate to heritage matters.

Ecology

- 5.43 The NPPF advises that the conservation of wildlife are important considerations in AONB's.³ To protect and enhance biodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of protected species; and identify and pursue opportunities for securing measurable net gains for biodiversity.⁴
- 5.44 Policy CS12 (Green Infrastructure) of the Core Strategy 2014 seeks to protect sites designated for their biodiversity value based on their level of importance and enhance, restore, recreate, and maintain habitats particularly within Biodiversity Opportunity Areas, which is a designation of this site. The development is located within the curtilage of a residential property and on the site of an existing outbuilding.
- 5.45 The opportunity afforded by this resubmission has been taken to commission a Preliminary Roost Assessment Survey (Arbtech, August 2023) and this is submitted to accompany the application.
- 5.46 The survey concluded that the existing building to be demolished has negligible bat habitat value and no crevices or cavities of bat roosting value were found. The site also has limited value for roosting birds and provides negligible habitat for barn owls.
- 5.47 Whilst no further surveys are recommended, the PEA recommends ecological enhancements for bats in the form of a bat box either on the new building or to be installed on retained buildings, and 2 no. woodcrete bird boxes either on the new building or retained trees on the site.

- 5.48 Through these measures, to be secured by planning condition(s), the proposal would protect nature conservation interests, and maximise opportunities to achieve net gains in biodiversity, as appropriate, in accord with the advice in the Framework (Para's 172 and 174); and Policy CS12 (Green Infrastructure) of the Core Strategy 2014.

³ Paragraph 172 of the Framework

⁴ Paragraph 174 of the Framework

6.0 CONCLUSIONS

- 6.1 Having regard to the relevant development plan policies and the other material considerations referred to above, the Proposed Development has addressed the reasons for refusal relating to the Refused Scheme, which ostensibly related to matters of scale, and is considered to be acceptable, and an approval is justifiable for the following reasons.
- I. The proposed replacement outbuilding, by virtue of its size, design, and siting, comprises an appropriate form of development in the Green Belt. The proposal accords with the requirements of Policy CS02 of the Gravesham Core Strategy 2014, saved Policy C13 of the Gravesham Local Plan 1994 and paragraphs 147, 148, 149 of the Framework.
 - II. The proposed replacement outbuilding, by virtue of its size, design, and siting, would conserve the rural landscape context of this site within the Kent Downs Area of Outstanding Natural Beauty and the Luddesdown Downs Landscape Character Area. As such, the proposal accords with the requirements of policies CS12 and CS19 of the Gravesham Core Strategy 2014, and paragraphs 130, 174 and 176 of the Framework.
 - III. The proposed replacement outbuilding, by virtue of its size, design, and siting, would conserve the setting of the original grade II listed Farmhouse and curtilage listed Gatehouse. As such, the proposal accords with the requirements of policies CS19 and CS20 of the Gravesham Core Strategy 2014, saved Policy TC2 of the Gravesham Local Plan 1994 and paragraphs 190 and 197 of the Framework.
- 6.2 For all of the aforementioned reasons, we respectfully ask that the LPA recognises the objectives inherent within the Revised Scheme and grants planning permission subject to the imposition of any relevant and necessary conditions.

