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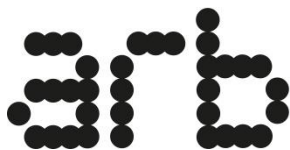
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My Ref: 539

18 September 2023

Proposed Replacement Dwelling on the site of "Nutfield Farm",
Priestwood Road, Harvel, Meopham, Kent, DA13 0DA: Mr & Mrs Stephen Church

DESIGN & ACCESS STATEMENT



Architects
Registration
Board

RIBA 
Chartered Practice

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1.0 Introduction

1.01. This is an application for Full Planning Permission to erect a detached three-bedroom bungalow to replace the existing dwelling and most of the associated outbuildings. The existing garage block and one of the associated outbuildings known as **shed 2** will remain. The ride-on mower, currently housed in its own mower store, will be relocated to the retained garage, where there is sufficient available space. (figure 1)



Figure 1: Part site plan of the proposed replacement dwelling with retained garage and outbuilding

1.02. This application includes the following documents: -

- My measured survey drawings of the existing dwelling and specified outbuildings. (Drawings numbers 539/01-/05 inclusive). The site plan has been produced using topographical levelling information from Messrs Enka Surveys of Crowborough, East Sussex.
- My proposal drawings. (Drawings numbers 539/PL31-/PL37 inclusive).
- This Design and Access Statement.

1.03. The proposal considers and addresses the issues associated with the previous proposal for a chalet bungalow, which was refused planning permission on 09 September 2022 under reference **20220792** and for a bungalow which was refused planning permission on 25 May 2023 under reference **20230312**. This Statement specifically deals with the Council's reasoning given for refusing planning approval for application reference **20230312** and it will show that this application satisfies all of the previous concerns of the case officer, namely by:-

- **Reducing the dwelling footprint**
- **Reducing the ridge height**
- **Reducing the volume**
- **Changing the gablets to hips**
- **Removing the replacement garage and combined mower store from the application altogether.**

If the Council would like to reconsider their original objection to the replacement garage and mower store, I would be happy to consider this as an alternative solution by way of amending the planning submission.

*****Please note that an appeal has been lodged with the Planning Inspectorate in respect of GBC Planning Reference 20230312. It has been registered under reference APP/K2230/W/23/3323850 and this submission, whilst acknowledging the concerns of the Council, is made without prejudice to the outcome of that appeal. The Council should not infer from this submission that my clients accept its decision with regard to Planning Reference 20230312. *****

1.04. The proposal specifically addresses the Council's previous concerns about planning reference **20220792** through well thought-out positioning and considerate design, which results in a replacement dwelling with reduced height, footprint area and volume when compared with

the existing dwelling and outbuildings. ***This Statement also deals with the Council's reasoning given for planning refusal reference 20230312.***

- 1.05.** The proposal is for a high-quality, beautiful, and sustainable home following Paragraphs 126 and 128 of the National Planning Policy Framework.
- 1.06.** The proposal has been prepared in full consultation with my clients who have lived at **"Nutfield Farm"** since 2021.

2.0 The Application Site

- 2.01.** “**Nutfield Farm**” (*figure 2*) is located on the east side of Priestwood Road, approximately 100 metres north of the junction with Chandler’s Hill. The property forms much of what was the original core of a considerably larger site. It is no longer a farm but has full C3 use without restriction.



Figure 2: Nutfield Farm

- 2.02.** The site is a rural location within the Metropolitan Green Belt. It is also within the *Harvel Wooded Downs Designated Landscape Character Area* and within the *Kent Downs Area of Outstanding Natural Beauty*.
- 2.03.** The application site has an area of 0.37 hectares (0.91 acres).
- 2.04.** The application site includes the present single-storey dwelling, together with a number of outbuildings, including a large, green-coloured garage, two substantial sheds, a mower store, three greenhouses and a canopied area. The garage, the two sheds and the mower store are detailed on my drawing number 539/05 and their statistics have been used on my drawings and throughout this report. All of the outbuildings, with the exception of the garage and one of the other outbuildings, identified as *shed 2*, will be removed from the site. The greenhouses and canopied area have not been detailed and their statistics have not been used. Their removal nevertheless, has a significant bearing on the merits of this proposal.

- 2.05.** There is an extensive amount of concrete and unmade hardstanding on the front part of the site and this is shown on my as-existing site plan drawing number 539/02.
- 2.06.** The site slopes gently down eastwards from Priestwood Road in the west by approximately 2.6 metres. (From a level of approximately 152.3 metres AOD along Priestwood Road to 149.7 metres AOD along the rear boundary). That averages out at an approximate gradient across the site of 1:35.
- 2.07.** The site is well screened from Priestwood Road by a dense conifer hedge, 3 metres high, along the length of the frontage. (*figure 3*)



Figure 3: 3 metre high hedge screening the site from Priestwood Road

3.0 Harvel Wooded Downs Designated Landscape Character Area

3.01. The site is located, as previously stated, within the Harvel Wooded Downs Designated Landscape Character Area.

3.02. The relevant key characteristics of the Landscape Character Area are: -

- Varied topography with steep valley sides and plateaux
- Ancient Woodland, chestnut coppice and small paddocks and pasture
- Haphazard mosaic of residential plots and small holdings set within the woodland

3.03. The overall condition of the Harvel Wooded Downs character area is considered to be moderate. This is recognised as a balance between the poorer condition of many of the plotlands which lie to the north and west, and the stronger 'cultural integrity' of Harvel. Sensitivity is assessed as moderate. Harvel can be considered to have a stronger sense of place and historic continuity than the plotland areas, but strong visual containment is also considered to reduce sensitivity. The application site would be deemed to be a part of the plotlands to the north of Harvel village.

3.04. The area typically consists of a mix of predominantly chalet bungalows and full two-storey dwellings built with a varying variety of materials ranging in quality from poor to good.

4.0 Planning History

- 4.01.** The original “**Nutfield**” farmhouse appears on the 1936 Ordnance Survey map, but not on the 1908 map. It was still there in similar form in 1961, together with several outbuildings, which still exist. See *figures 4 to 7* below. It is apparent by reference to later planning applications, that it was still there in a similar form in 1980.



Figure 4: Nutfield Farm from 1908 Ordnance Survey. The approximate position of the application site is shown tinted red.

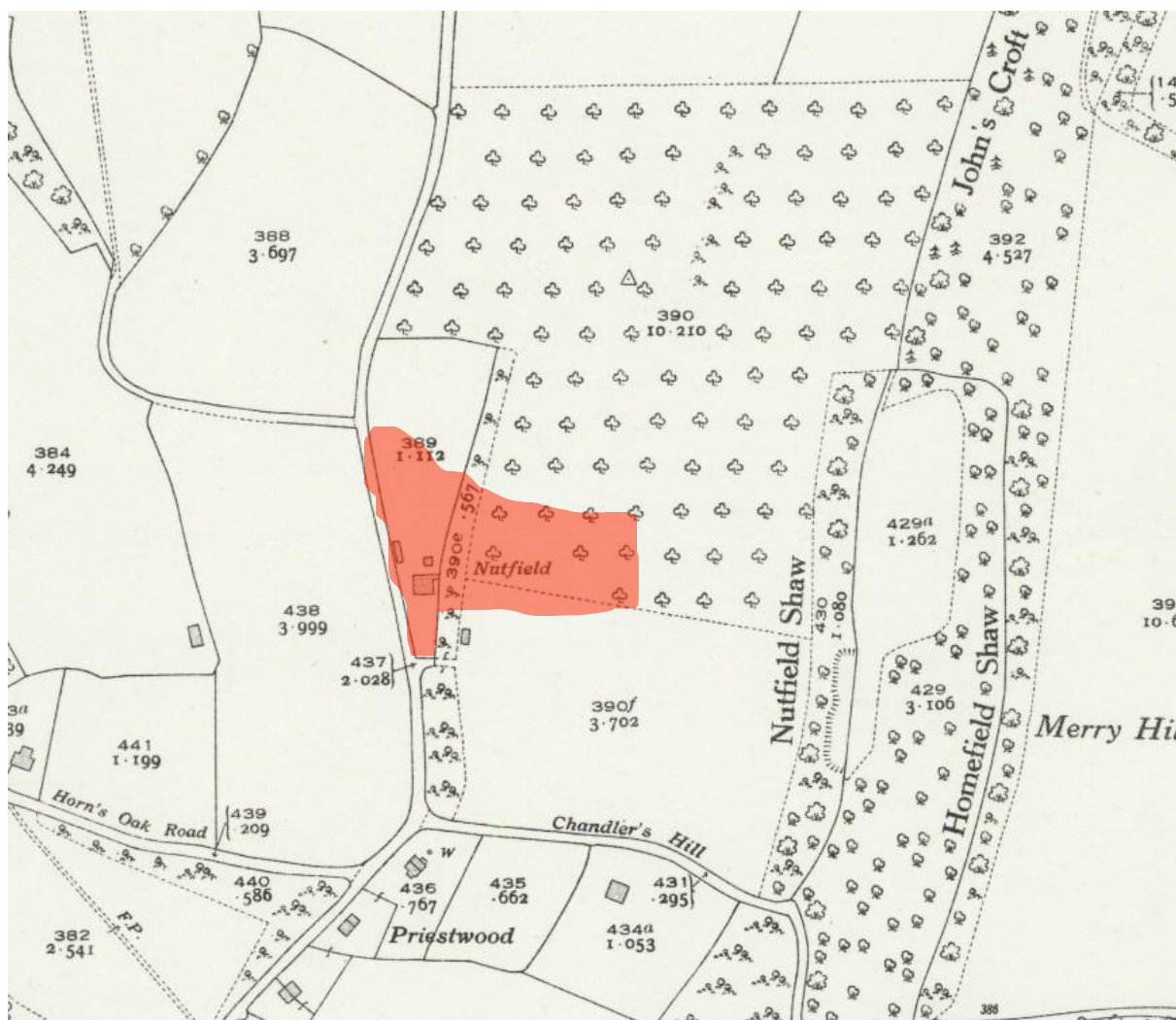


Figure 5: Nutfield Farm from 1936 Ordnance Survey. The approximate position of the application site is shown tinted red.

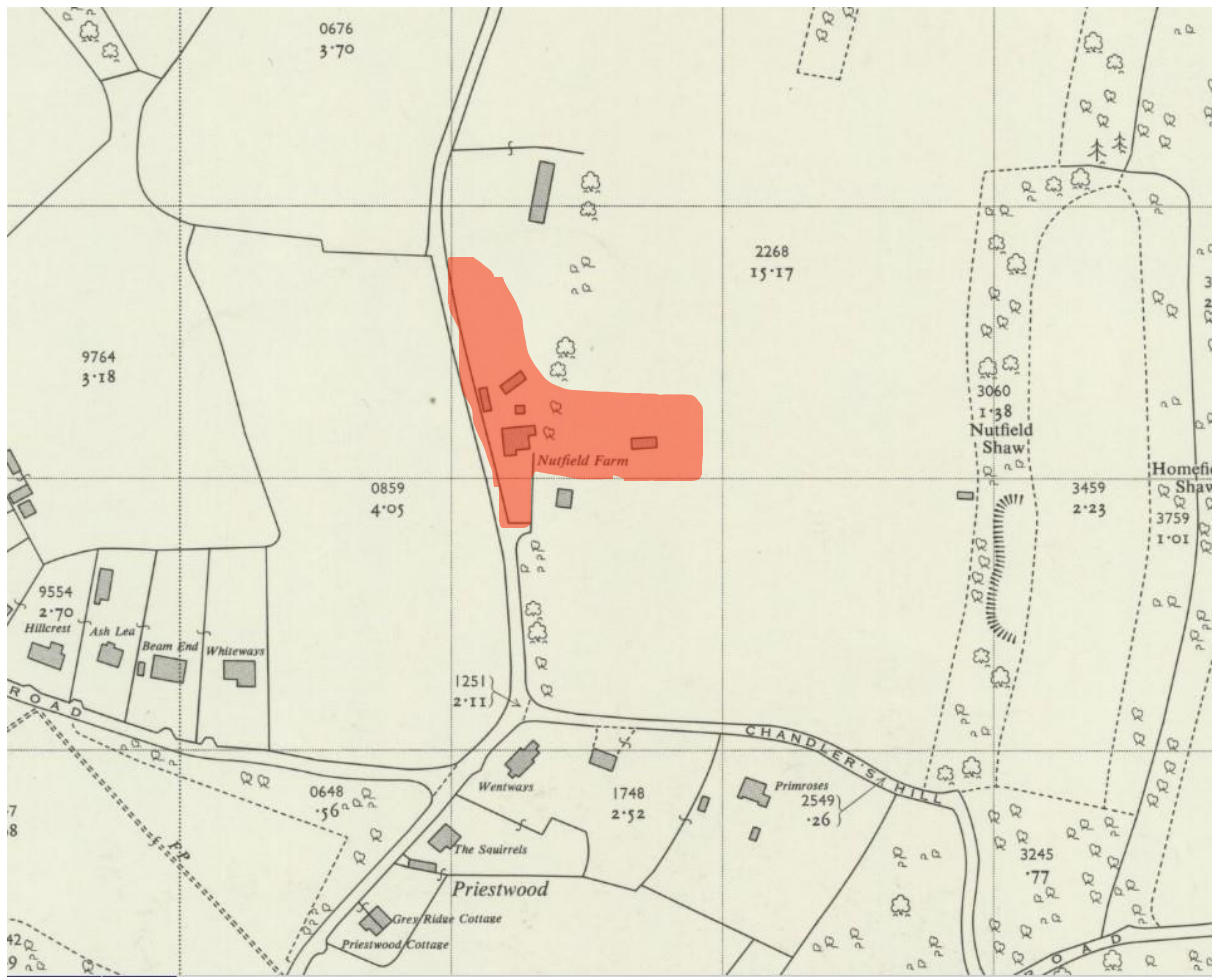


Figure 6: Nutfield Farm from 1961 Ordnance Survey. The approximate position of the application site is shown tinted red.



Figure 7: Nutfield Farm from 2023 Ordnance Survey. The approximate position of the application site is shown tinted red.

- 4.02.** The original farmhouse was destroyed by fire. Planning Permission was granted on 28 July 1980 under reference **19800421** for a replacement agricultural bungalow taking the form of a “Colt” timber frame structure. The application details stated that the owner controlled about 33 acres adjoining the proposed development. “**Nutfield Farm**” comprised a viable 60-sow pig unit at the time, with associated farm buildings of owned land, plus 80 acres of securely rented land.
- 4.03.** An application to extend the replacement bungalow was granted on 28 September 1983 under reference **19830409**, with modifications to reduce the size of the proposal. The extension was built in the same fashion as the original, using Colt components, and it appears indistinguishable from the original structure. It would appear that this is current dwelling as it now stands.
- 4.04.** An application to remove the restrictive agricultural occupancy condition imposed by planning permission **19800421** was granted on 20 April 2011 under reference **20100364**. By that time, a combination of personal and commercial factors had led to the large majority of land and buildings being disposed of.

- 4.05. An application to replace the present dwelling and outbuildings by a chalet bungalow and detached garage was refused planning permission by your Council on 09 September 2022 under reference **20220792**. The application was prepared and submitted by another agent. The single reason given for refusal was: -

The proposed replacement dwelling and garage will have an adverse cumulative impact on the openness of the Green Belt and the Harvel Wooded Downs Landscape Character Area, by virtue of disproportionate scale and increase in overall height and bulk which would be highly visible from the street scene and surrounding area. Therefore, the proposal is contrary to the Design Guidance SPD (2021), Policy CS19 of Gravesham's Local Plan Core Strategy (2014), saved Policy C13 of the Gravesham Local Plan First Review (1994), as well as Sections 12 and 13 of the National Planning Policy Framework (2021).

- 4.06. An application to replace the present dwelling and outbuildings by a 3 bedroom bungalow and detached garage with integral mower store was refused planning permission by your Council on 25 May 2023 under reference **20230312**. The single reason given for refusal was: -

The proposed replacement dwelling and garage will have an adverse cumulative impact on the openness of the Green Belt and the Harvel Wooded Downs Landscape Character Area, by virtue of disproportionate scale and increase in overall external footprint, height and bulk which would be highly visible from the street scene and surrounding area. Therefore, the proposal is contrary to the Design Guidance SPD (2021), Policy CS19 of Gravesham's Local Plan Core Strategy (2014), saved Policy C13 of the Gravesham Local Plan First Review (1994), as well as Sections 12 and 13 of the National Planning Policy Framework (2021).

- 4.07. Application reference **20230312** had sought to address all of the issues and concerns arising from planning refusal reference **20220792**. A detailed Design & Access Statement formed part of the application and fully explained the design philosophy and its compliance with current planning policies. The application was validated by the Council on 04 April 2023. No objections were received by the Council to the application. The proposal actually received 5 comments in support of the application. The decision was made at officer level, under delegated powers.

- 4.08. Please note that an appeal has been lodged with the Planning Inspectorate in respect of GBC Planning Reference **20230312**. It has been registered under reference **APP/K2230/W/23/3323850** and this submission, whilst acknowledging the concerns of the Council, is made without prejudice to the outcome of that appeal. The Council should not infer

from this submission that my clients accept its decision with regard to Planning Reference **20230312**.

4.09. This revised proposal seeks to address all of the issues and concerns arising from planning refusal reference **20220792**. *This Statement also deals with the Council's reasoning given for planning refusal reference 20230312.* The proposal is fully explained elsewhere within this document.

4.10 The Borough Council's case officer referred to the following planning applications in the delegated report for the previous submission as if they were relevant to this site: -

<i>Reference</i>	<i>Description</i>	<i>Decision</i>	<i>Decision Date</i>
20020753	<i>Erection of 3 bedroom dwelling as a replacement for existing mobile home/dwelling.</i>	<i>Permission</i>	08.04.2003
19800813	<i>Extension to existing chalet annexe to form agricultural dwelling</i>	<i>Permission</i>	17.11.1980

These permissions are not relevant to the application site. They relate to neighbouring properties that were once part of the farm before it was divided up. Permission reference **20020753** refers to the adjacent property known as "**Merryhill Farm**" and permission reference **19800813** refers to the adjacent property known as "**Nutfields**".

5.0 Adjoining Dwellings

5.01. There are two modern dwellings immediately to the north and to the south of the application site and they have each been built on parts of the site which formerly comprised “**Nutfield Farm**”. These are “**Merryhill Farm**” (ridge height 157.03) (*figure 8*) and “**Nutfields**” (ridge height 158.41) (*figure 9*). Both these dwellings, whilst being set further back from the road, are taller than “**Nutfield Farm**” (ridge height 156.83).

5.02. “**Merryhill Farm**” lies immediately to the north of the application site and “**Nutfields**” to the south.

5.03. “**Merryhill Farm**”



Figure 8: “Merryhill Farm”

The dwelling was granted permission on 08 April 2003 under planning reference **20020753** as a replacement bungalow for a previously existing mobile home / dwelling on the site. It is set behind a pre-existing barn which, according to Condition 4 of the approval, is kept for storage purposes and which presumably, existed when the site formed a part of the working “**Nutfield Farm**”.

The dwelling has external walls of red brick facing brick with feather-edge weatherboarding under a pitched gabled roof covered with plain tiles. It has high level windows serving the hall and bathroom.

“Merryhill Farm” has an eaves height of 153.57 metres AOD and a ridge height of 157.03 metres AOD.

5.04. **“Nutfields”**



Figure 9: “Nutfields”

“Nutfields” was originally known as **“Nutfield Bungalow”** when it was a timber framed structure dating from the late 1920s. It was then a chalet annexe ancillary to **“Nutfield Farm”**. The property was sold off in 1983.

An application to extend the bungalow was granted on 17 November 1980 under planning reference **19800813**.

An application to remove the agricultural occupancy condition was refused on 19 December 1988 under planning reference **19880735**.

An application to extend the property and to erect a detached double garage was approved on 28 June 1988 under planning reference **19880152**.

An application for a replacement dwelling on the site was approved on 04 May 1989 under planning reference **19890327**. It would appear that the replacement dwelling was built as a chalet bungalow with habitable accommodation at first floor level.

A subsequent application to insert a dormer window in the front roof slope and to provide additional bathroom accommodation at first floor level was approved on 24 August 2007 under planning reference **20070608**.

The current dwelling has external walls of red brick facing brick under pitched gabled roofs covered with plain tiles.

“**Nutfields**” has a large detached double garage in the front garden, which is both in line with the front of the dwelling and closer to the road than the dwelling.

“**Nutfields**” has a ridge height of 158.41 metres AOD. The eaves height could not be determined by the topographical survey.

6.0 The Existing Dwelling at “Nutfield Farm”

- 6.01.** The existing dwelling is a timber framed structure, which was manufactured by W.H. Colt, Son & Co. Ltd. of Bethersden, Ashford, Kent using prefabricated panels and delivered to the site in sections.
- 6.02.** The external walls are hung with cedar shingles sitting on a brick plinth. The bricks used are LBC Flettons. Bricks such as these are usually hidden behind other finishes, are not frost resistant and are not considered to be a suitable facing brick. Similar examples of dwellings manufactured by Colt with cedar shingle cladding can be found all over the UK and they are not particularly characteristic of a vernacular dwelling to be found within the ***North Kent Downs Area of Outstanding Natural Beauty***.
- 6.03.** The external walls are only 150mm thick. That thickness includes plasterboard, studs, sheathing board, battens and cedar shingles and it can only mean that the structural timber studs have a maximum depth of 75mm. A 75mm thickness of glass fibre insulation placed between the studs falls far short of the thickness required to meet the current thermal performance levels of Part L of the Building Regulations. The timber studs used in contemporary timber-framed structures would need to be at least 150mm deep in order that the requirements of Part L of the Building Regulations can be met.
- 6.04.** The 22½° pitched roof is covered with artificial slate. This material, manufactured by Speakers Eternit Ltd, originally had a sprayed on painted finish, which has weathered away to reveal the mucky grey substrate. It would have been a cheap option with which to cover the roof and it really looks rather unsightly.
- 6.05.** The small, enclosed porch has a flat roof covered with roofing felt.
- 6.06.** The amount of exposed brick supporting wall increases rearwards, as the external ground level drops by about 830mm. By the time the rearmost part of the existing dwelling is reached, there is a large amount of exposed and unattractive Fletton brick walling in plain sight.

6.07. The accommodation includes the following: -

Existing Dwelling				
	Room	Floor Area (m ²)	Footprint Area (m ²)	Volume (m ³)
	Living Room	21.714		
	Dining Room	21.908		
	Kitchen	17.614		
	Bedroom 1	12.706		
	Bedroom 2	13.207		
	Bedroom 3	8.776		
	Bedroom 4	12.475		
	Bathroom	5.487		
	WC	1.429		
	Porch / Hall	3.161		
	Inner Hall	6.738		
Total areas & volume		130.760	138.294	572.387

6.08. The dwelling suffers from very poor internal circulation. All rooms other than the kitchen and wc compartment are inner rooms to various degrees and they are all finally accessed from the kitchen. The living room is an inner, inner room and bedroom 4 is an inner, inner, inner room. The internal layout is far from ideal, where all rooms should be accessible directly from a hallway.

6.09. It goes without saying that the dwelling has no architectural merit or interest, it is constructed from low quality materials, it is very poorly insulated and it is of inferior construction. It has in short, reached the end of its useful life and needs a suitable replacement which is fit for purpose.

7.0 The Existing Outbuildings at “Nutfield Farm”

7.01. Several outbuildings have existed on the site for many years. The largest of these is used as a garage for the parking of cars (*figure 10*) and another is used as a storage area for a ride-on motor mower, which is required due to the large area of garden laid to lawn. They are all dilapidated and unsightly, being clad variously with corrugated iron, rendered breeze block and timber boarding. They do not contribute positively to the ***Kent Downs Area of Outstanding Natural Beauty***. The garage block in particular is an eyesore. It is situated very close to Priestwood Road, as can be seen from the photograph. It is very conspicuous and can be easily seen from Priestwood Road. This proposal retains the garage and one of the other outbuildings. The existing mower store, shed 1, 3 greenhouses and a canopied area will be removed. The garage will also now additionally accommodate the ride-on mower, which is presently kept in a dedicated store. This accommodation is necessary for my clients. Nearly all the neighbouring properties in the wider location have garages. It is being retained solely because the case officer disliked the well-designed replacement garage and integrated mower store shown as a part of the previous proposal and which would have been set much further back from the road than the existing garage. The previously proposed garage and integrated mower store would have been far less conspicuous when seen from Priestwood Road.



Figure 10: existing garage

7.02. The existing outbuildings include the following structures: -

Specified Outbuildings		
	Footprint Area (m ²)	Volume (m ³)
Garage	56.775	158.245
Mower Store	15.480	40.093
Shed 1	15.710	40.688
Shed 2	21.364	42.728
Total footprint areas & volumes of specified outbuildings	109.329	281.754

7.03. There are other outbuildings on the site, including three greenhouses and a canopied area, which I have not included in my assessment of area and volume. They do however, represent a significant amount of built area and they should also be considered when the Council assesses this planning submission.

8.0 The Existing Hard Landscaping at “Nutfield Farm”

- 8.01.** There is over 366m² (3,943 ft²). of concrete and unmade hardstanding on the site. It is frankly, unsightly and excessive.
- 8.02.** A raised terrace extends rearwards from the back wall of the dwelling for 4 metres. It has a parapet wall of concrete bricks with infill panels of concrete California screen blocks. The structure below terrace level is formed from breeze blocks. The terrace is raised above the garden by about 1.22 metres (4ft). It is raised due to the sloping site and the need for it to relate to the finished floor area of the dwelling.
- 8.03.** In summary, the total footprint areas and volumes of the existing dwelling and selected outbuildings on the site are as follows: -

Existing Dwelling & Specified Outbuildings		
	Footprint Area (m ²)	Volume (m ³)
Total footprint areas & volumes of existing dwelling & specified outbuildings	247.623	854.141

9.0 The Proposed Replacement Dwelling at “Nutfield Farm”

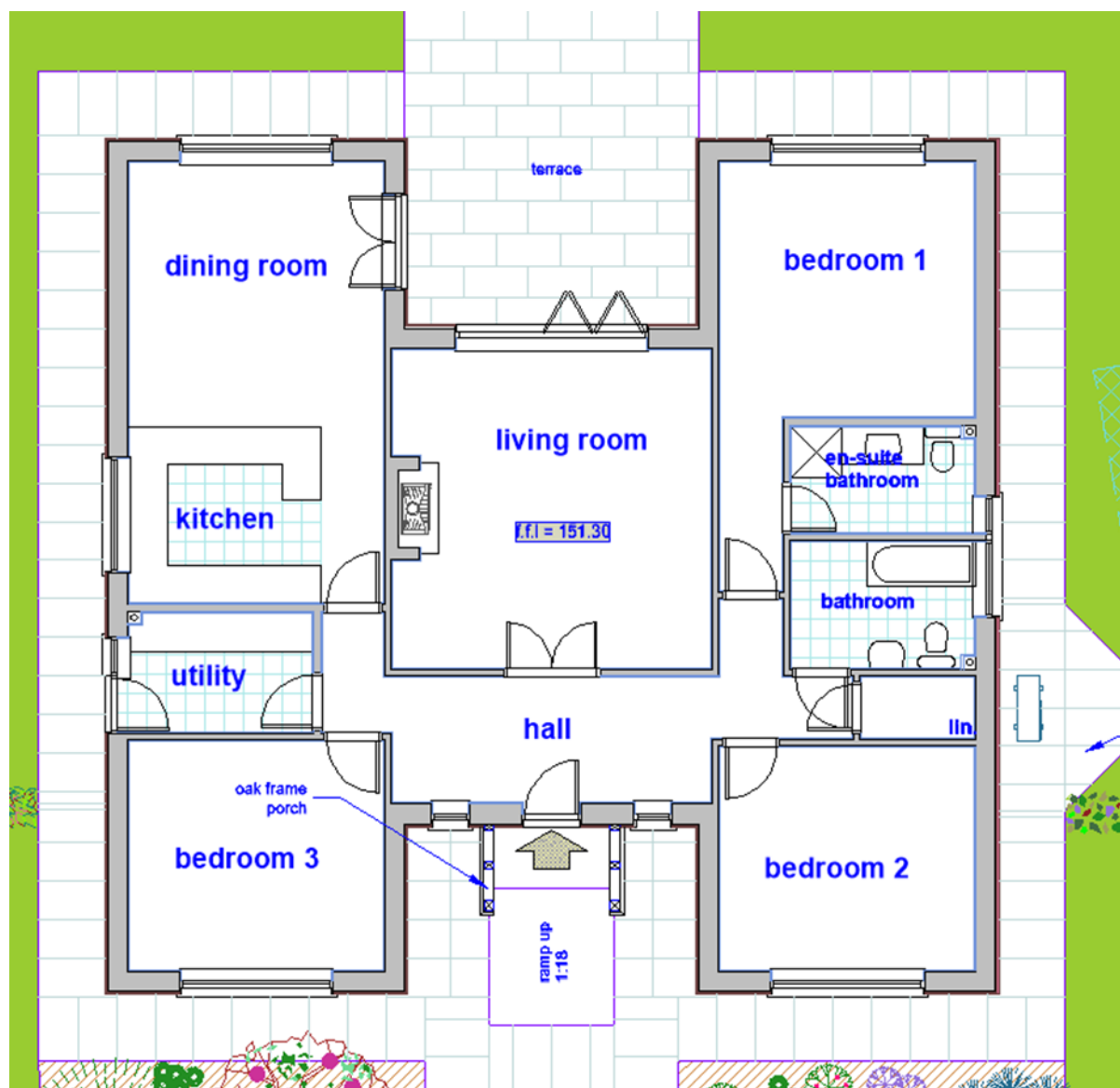


Figure 11: plan of proposed replacement dwelling

9.01. This proposal considers and addresses the issues associated with the previous proposal for a chalet bungalow on the site, which was refused planning permission by Gravesham Borough Council on 09 September 2022 under planning reference **20220792**. Those issues included ridge height, bulk, mass and an excessive increase in floor area. ***This Statement also deals with the Council’s reasoning given for planning refusal reference 20230312.***

9.02. This proposal specifically addresses the Council's previous concerns through well thought-out positioning and considerate design. This results in a replacement dwelling when compared with the existing dwelling and outbuildings with: -

- *reduced height*
- *reduced footprint area &*
- *reduced volume*

The previously proposed garage and combined mower store has also been removed entirely from this proposal.

9.03. The proposed replacement dwelling will be set a further 17 metres back from Priestwood Road than the existing dwelling. It will also be set at a lower level than the existing dwelling and its roof height will be lower than the existing dwelling. Its impact on the street scene will therefore, be lower than that of the existing dwelling.

9.04. **The proposed replacement dwelling will be a bungalow (figures 11, 12 & 13) and it will be of traditional masonry construction with hipped and gabled roofs.** The main section of the roof will have hipped ends which will blend in with the smaller gabled wings to both front and rear. The previous proposal had gablets at the ends of the main roof, which the case officer considered to be "*incongruous*". Whilst I thoroughly disagree with that opinion, this proposal, by substituting the gablets for hipped ends, will have reduced volume in comparison to the previous proposal. The total volume of the proposed dwelling will be 586.073m³, which is a reduction of nearly 23m³ over the previous proposal (608.981m³). The external walls will be clad with feather-edged oak weatherboarding, naturally weathered, on low red brick walls. The roof covering will be of plain clay roof tiles. The roof pitch will be 35°, which is the stipulated minimum pitch for a plain clay machine-made tile. The hips will be clad with bonnet tiles and the roof will be capped with half round terracotta ridge tiles. The gable bargeboards will also be of oak. There will additionally be an open oak framed porch with a 45° pitched roof against the front entrance door.

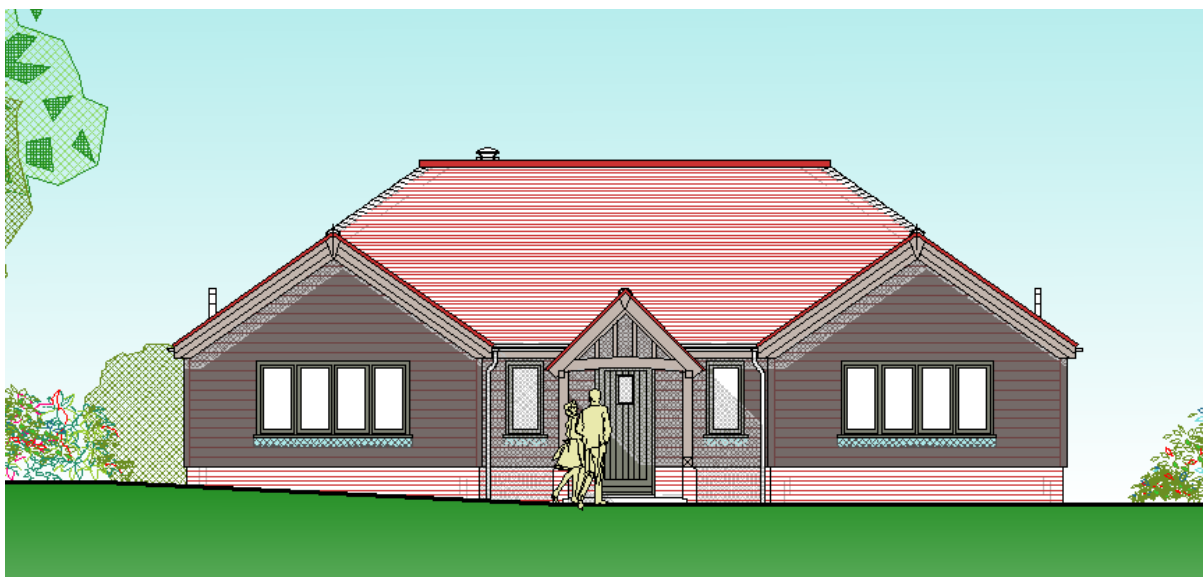


Figure 12: front elevation of proposed replacement dwelling

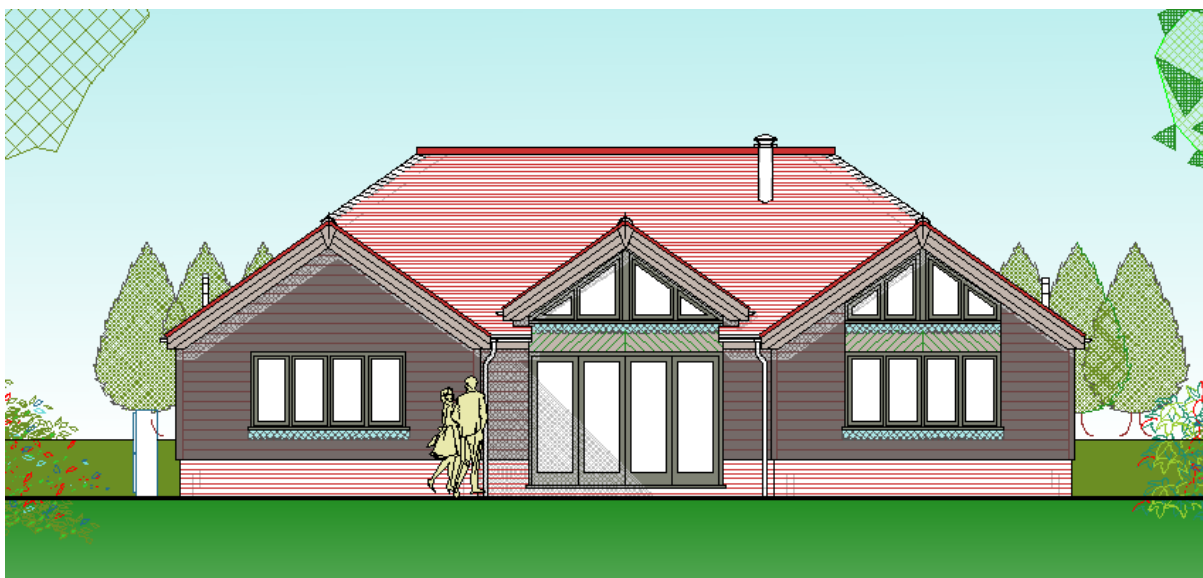


Figure 13: rear elevation of proposed replacement dwelling

9.05. The existing dwelling has a 22.5° pitched roof and is covered with artificial slates. This roof pitch, whilst suitable for artificial slates, is not suitable for plain clay tiles. A pitched roof covered with plain clay tiles requires a minimum pitch of 35°. Plain tiles are more suitable to this AONB and Green Belt location than artificial slates, which weather badly. They are far more attractive and they will also fit in with the existing dwellings to each side of the site – “Merryhill Farm” and “Nutfields”. Both of these dwellings have roofs covered with plain tiles of a similar roof pitch. The case officer thought that the 35° roof pitch as specified was “steep” when writing in the delegated report for the previous planning submission. That pitch was

specified for both this and the previous proposal. The definition of what is “steep” is a grey area. Some sources suggest that a roof pitch of above 18° is “steep”. By this definition, the roof over the existing dwelling would be classed as “steep”. A plan form taking the shape of a capital ‘H’ has been chosen for this proposal to keep the roof spans and therefore, heights low. This will enable the roof height to be kept to the absolute minimum, whilst still being covered with plain clay tiles. The roof form is consistent and has shallow gabled projecting wings at both front and rear. The existing dwelling has the same gabled roof form as that being proposed. The height and roof design could in no way be classed as *bulky* or *incongruous*. The gables will blend with the hipped ends of the main roof. The design is measured, consistent and coherent. It will have less impact on the Green Belt than the existing buildings by virtue of its decreased footprint area and volume. The proposal will also be lower than the existing dwelling. It will certainly not have *excessive height* and *bulk* as asserted by the case officer in the delegated report for the previous proposal.

- 9.06. Marley Tiles, a well-established UK roof tile manufacturer of some renown, makes the following statement about roof pitches in its website: -

In the UK, traditional roof pitches measure between 30° and 50°, while low-pitch roofs are defined as less than 30°.

What is being proposed would be classed in this context as at the lower end of the scale of a **traditional** roof pitch; and one which is best suited to the UK climate.

- 9.07 Guidance is given with regard to the use of plain clay tiles and bricks in paragraph 4.2.9 of the “**Kent Downs AONB Landscape Design Handbook**”, of which the local Meopham Parish Council (although strangely not Gravesham Borough Council) was a consultee,. It reads: -

Clay bricks and tiles are the traditional building materials of the Kent Downs. The colour and texture of clay bricks and tiles varies according to the source of the clay and the manufacturing process used. Traditionally much of the process was done by hand using a wide variety of sources for the clay resulting in a wealth of variety in the finished product. Large-scale quarries and mechanised production processes have reduced this variability. Nevertheless, clay products still have inherent characteristics and a unique appearance not replicated by concrete products.

- 9.08. The replacement dwelling will be set back from the existing, which is really too close to the road. It will relate better in this position to the adjoining dwellings, “**Merryhill Farm**” and “**Nutfields**”.
- 9.09. The finished ground floor level will be approximately 150mm above natural ground level at its highest point. This will be at a much lower level than the existing dwelling, because of the sloping nature of the site. The finished floor level of the existing dwelling is shown at 152.46 metres AOD on the topographical survey. The finished floor level of the proposed replacement dwelling will be 151.30 metres AOD. That is to say, the new finished floor level of the replacement dwelling will be 1.16 metres lower than that of the existing dwelling.
- 9.10. Whereas the existing dwelling has four bedrooms, the proposed new dwelling will have just three double-size bedrooms. The previous proposal was also for a three bedroom bungalow, yet the case officer’s report still mistakenly referred to it as having four bedrooms on page 10/13.
- 9.11. The ‘H’ plan layout will enable the pitched roofs above to be kept to a minimum height and pitch suitable for plain clay tiles. I refer in this respect to planning reference **20200230** for two replacement dwellings on a nearby similar site in the same Green Belt and AONB location, which were approved by the Borough Council on 4 May 2020. The applicant argued that the ‘L’ shape of the proposed dwellings was arrived at in order that the building depth could be kept small, as opposed to it having a square or a rectangular shape. The roofline of this proposal will be broken up in a similar manner to planning approval reference **20200230**, to reduce the bulk and massing of the proposal in comparison to the existing structures. The proposed maximum overall width will be 13.91m; a reduction of 180mm from the previous proposal maximum overall width of 14.09m. The proposed maximum overall depth will be 13.31m; a reduction of 180mm from the previous proposal maximum overall depth of 13.49m. These measurements are clearly shown on my plan drawing number 539/PL32. The case officer quoted incorrect measurements in the delegated report for the previous proposal, although they were clearly shown on my drawing number 539/PL02. I may be labouring the point, but I respectfully request that the case officer really should read my Statements properly when making an assessment and ensure that the facts are correct.

9.12. The existing dwelling has a ground to ridge height of 4.848m at the front and 5.563m at the rear. The measurement differences are due to the sloping nature of the site. This is shown on the topographical survey carried out by an accredited surveying company. The proposed replacement dwelling will have a maximum ground to ridge height of 5.424m at its highest point. **The ground to ridge height of 5.424m for the replacement dwelling is 139mm less than the 5.563m ground to ridge height for the existing dwelling. It will be 63mm lower than the previous proposal (5.487m), due to the reduced footprint area. It will also be 256mm lower than the existing dwelling in actual terms using Ordnance Survey Datum measurements. Most of the replacement dwelling will have a ground to ridge height of 4.339m. It will again be 63mm lower than the previous proposal (4.402m), due to the reduced footprint area and 1.341m lower than the existing dwelling in actual terms using Ordnance Survey Datum measurements.** On both counts, the proposed replacement dwelling will have lower ground to ridge heights than the existing dwelling. On both counts also, ground to eaves heights will be lower. The ground to underside of eaves height of the existing dwelling at the rear is 3.316m and at the front, it is 2.601m. The proposed replacement dwelling will have a ground to underside of eaves height of 2.309m and 2.484m to the top of the eaves. The case officer had previously stated incorrectly that the eaves height will be 2.72m, which is considerably higher than would actually have been the case. **It will be between 300mm and 1m lower than the existing ground to eaves height of the existing dwelling, depending on where the measurement is actually taken.** In addition to this, the proposed replacement dwelling will be set at a lower level than the existing dwelling and the proposed replacement dwelling will be even lower than this to the existing dwelling, relative to the Ordnance Survey Datum. See my drawing numbers 539/PL35 and /PL37 in this respect. I may be further labouring the point, but I respectfully request again that the case officer really should read my Statements properly when making an assessment and ensure that the facts are correct.

9.13. The proposed accommodation will include the following: -

Proposed Replacement Dwelling			
	Room	Floor Area (m ²)	Footprint Area (m ²)
	Living Room	24.552	
	Kitchen/Dining Room	27.112	
	Utility Room	5.296	
	Bedroom 1	18.221	
	Bedroom 1 En-Suite Bathroom	4.725	
	Bedroom 2	13.665	
	Bedroom 3	14.06	
	Bathroom	5.582	
	Linen Cupboard	1.676	
	Hall	14.83	
	Total areas	136.314	160.447

9.14. The external walls of the proposed new dwelling will need to be thicker than the flimsy walls of the existing dwelling, in order to comply with the thermal insulation requirements of Part L of the Building Regulations and for structural stability reasons. The existing wall thickness, including finishes, is only 150mm. Planning proposal reference **20230312** was specified with an external wall thickness of 470mm. The Council considered in its appraisal of the previous planning submission that no specific arguments had been put forward in relation to the assessment of ‘*Very Special Circumstances*’. I disagree with this assertion and a case for ‘*Very Special Circumstances*’ was clearly put forward in my previous Design and Access Statement. I have included a separate section devoted to ‘*Very Special Circumstances*’ in this new Design and Access Statement, in order that it is made even more clearly than before. I consider that the increase in wall thickness should be treated as a ‘*Very Special Circumstances Case*’. My clients now propose a more expensive form of external wall construction in order to address the Council’s previously stated concerns about the increase in footprint area over the existing dwelling. The external wall thickness will now be 380mm – that is to say, it will be 90mm thinner than for the previous proposal. It has reduced the footprint area by approximately 6m² in comparison to the previous proposal. I trust that the case officer will acknowledge that

my clients have further sought to address the case officer's concerns about the footprint size. The build-up of the new external wall construction from outside to inside will now be: -

Feather edge oak weatherboarding on 25x50mm vertical battens on 100mm block outer leaf (red stock facing brick below weatherboarding), 100mm cavity filled with 90mm PIR insulation, 100mm block inner leaf & 12.5mm plasterboard with skim finish on dabs.

9.15. Whereas the internal floor area of the proposed dwelling will be 136.314m² and similar to the internal floor area of the existing dwelling measuring 130.760m², the footprint area will be greater proportionally, due to the requirement for much thicker external walls than the existing. May I emphasise as strongly as I may to the case officer, who will hopefully be reading this Statement diligently, that there is no construction with 150mm thick external walls including finishes that would meet either structural stability requirements or Part L of the Building Regulations and, because of this, the increased wall thickness should be treated as a 'Very Special Circumstance'. The resultant footprint area of the proposed dwelling will be 160.447m² in comparison to the footprint area of the existing dwelling of 148.43m², according to the case officer's delegated report for my clients' previous proposal. This is a minimal increase in area of 12.017m² or only 8.096%. This is more than compensated for however, when the footprint areas and volumes of the specified outbuildings to be removed are also considered. When these are properly considered, the total footprint area of the existing dwelling and specified outbuildings to be removed will be 169.484m² in comparison to the proposed dwelling footprint area of 160.447m². **The proposed footprint area will be lower than the existing.** I have not even considered the further lessening of the impact of the built form on this site caused by the additional removal of three greenhouses and a canopy, which are all shown on both the as existing and proposed site plans and which are also relevant to the consideration of this planning submission. **The overall reduction in footprint area of the built form on the site, together with the visual enhancements, all result in this being a 'Very Special Circumstances Case'.** See Section 10 of this Statement. A detailed analysis of the areas and volumes of the existing and proposed buildings is attached as an appendix to this Statement.

9.16. The proposal will have a smaller footprint area and volume than the existing dwelling and associated outbuildings which are to be removed. It will also be set at a lower level than the

existing dwelling and it will have a lower ridge height than the existing dwelling. It cannot, by any stretch of the imagination, be larger, higher or bulkier than the existing dwelling and its associated outbuildings.

- 9.17. The new replacement dwelling will remain as a bungalow and it will be lower than the existing dwelling, despite it having the steeper roofs which are necessary for plain clay tiles. The adjective “*steeper*” does not imply that the roof will be “*steep*”. The 35° pitch of the proposed roof is the minimum pitch required for a roof covered with plain clay tiles and in the context of this area, it would be regarded as “*traditional*”. The proposed height information with regard to comparisons between the existing and proposed replacement dwellings is clearly shown on my drawing number 539/PL37. The case officer again used incorrect and misleading height comparisons between the previous proposal and the existing dwelling in the delegated report for that application.
- 9.18. The feather-edged oak weatherboarding above a low brick wall will relate in design terms to the adjacent “**Merryhill Farm**” and the plain tiled roofs will relate in design terms both to “**Merryhill Farm**” and the similarly adjacent “**Nutfields**”.
- 9.19. A number of mature trees on the site have suffered from Ash Dieback (*hymenoscyphus fraxineus*) and have had to be removed. Many mature trees remain on the site, are identified on the site plan and they will be kept in-situ. None of the above are covered by a Tree Protection Order.
- 9.20. The proposed replacement dwelling will be set further back from Priestwood Road than the existing dwelling, but it will still be possible for emergency and service vehicles to access the property safely.
- 9.21. It is highly unlikely that remedial work will be required to clean up the soil, as no industrial activity has ever taken place on the site.
- 9.22. No special acoustic design is needed to achieve the noise levels suggested in the World Health Organisation (WHO) Environmental Health Criteria 12 guideline, as described in PPG24 Annex 2 (5,6). Standard double-glazing will be adequate and it will be installed as a matter of course to satisfy Part L of the Building Regulations.

- 9.23.** Air quality around the proposed replacement dwelling is within guidelines and no remediation measures will be required.
- 9.24.** The submitted details comply with Gravesham Borough Council's adopted *Residential layout Guidelines*, published in 2020 and with the standards published in *Technical Housing Standards – nationally described space standard*, published by the Department for Communities and Local Government in March 2015. The space standards for the proposed internal layouts and amenity areas are in excess of these guidelines. See paragraph 9.13 for details of the proposed accommodation.
- 9.25.** The bathroom windows will have obscure glazing.
- 9.26.** The proposed development is for a replacement family-sized home in an area with an appropriate garden size.
- 9.27.** The submitted details include a landscaping scheme, including details of existing, surface treatments, screening by walls, fences or other means and the planting of new trees, hedges, shrubs and grassed areas. Fencing will be provided for the protection of the retained trees during construction to the Borough Council's requirements.
- 9.28.** The site will continue to be well screened from Priestwood Road by the existing 3 metres high dense conifer hedge along the length of the frontage. This a factor which appears not to have been considered at all by the case officer in respect of the two previous applications. The case officer stated incorrectly that both the previous proposals would be '*highly visible from the street scene and surrounding area*'. The proposed replacement dwelling in its new location, will not be visible from any public viewpoint; including from Priestwood Road. My clients wish me to add that a site visit was not made by the case officer in respect of the two previous applications. My clients would welcome a site visit to be made by the case officer in respect of this fresh proposal when they could confirm the secluded nature of the site to the officer.

10.0 Very Special Circumstances for the small increase in footprint area & volume of the proposed replacement dwelling at Nutfield Farm

10.01. If the Council does not agree that this proposal is appropriate development, then the overall reduction in floor area and volume should be treated as a '*Very Special Circumstances*' Case based on the following paragraphs.

10.02. Gravesham Borough Council recently approved a proposal with staggering similarities to this and the previous proposal. The proposal was for the demolition of two existing dwellings ("**Four Acres**" and "**Azila**") and associated outbuildings, and their replacement by two single-storey dwellings and two garden sheds. The proposals were approved by the Council on 4 May 2020 under planning application reference **20200230**. The site is close to my clients' property and is located within the same Metropolitan Green Belt and AONB as my clients' property. The same case officer and team leader were also involved with this application as were involved with my clients' previous planning application references **20220792** and **20230312**.

10.03. "**Four Acres**" was a timber dwelling with a footprint area of 42.85m² and a volume of 91.39m³. "**Azila**" was a brick and tile dwelling with a footprint area of 83.18m² and a volume of 366.88m³. The combined footprint areas and volumes of the existing dwellings were therefore, 126.03m² (footprint area) and 458.27m³ (volume). Planning permission was sought and granted for two replacement dwellings on the site. Both replacement dwellings each had a footprint area of 98.8m² and a volume of 338m³. The combined footprint areas and volumes of the replacement dwellings were therefore, 197.6m² (footprint area) and 676m³ (volume). The proposed replacement dwellings would therefore, have a footprint area 56.79% and a volume 47.511% larger than the original dwellings. **The applicant successfully argued that the impact of the additional overall floorspace on the Green Belt was outweighed by the removal of the outbuildings on the site. The applicant also argued that, if the Council could not agree that the proposal was appropriate development, then the overall reduction in floor area and volume should be treated as a '*Very Special Circumstances*' case.**

10.04. The permitted replacement dwellings approved under planning application reference **20200230** were 'L' shaped. The reason given for the shape was so that the depth of the buildings could be kept small, as opposed to them having a square or rectangular shape. The

smaller depth would limit the roof height. The materials chosen for the replacement dwellings were to include red brick / weather board and plain clay tile, and a low eaves height, to ensure that redevelopment of the site amounted to an overall enhancement. The 35° roof pitch for the replacement dwellings would be steeper than the roof pitches on the original dwellings and the height would be significantly higher than that of the existing smaller dwelling.

10.05. It can be seen in the case of planning application reference **20200230** that the Borough Council approved proposals for replacement dwellings in the same AONB and Metropolitan Green Belt as this and my clients' previous proposals, with larger footprint areas and volumes than those which they replaced. The greater size was offset by the overall reduction of footprint area and volume after the removal of the associated outbuildings was factored into the equation. This proposal is for a replacement dwelling with a similar internal floor area to the existing but with a slightly larger footprint area, due to the need to have thicker external walls which are required by Part L of the Building Regulations and for reasons of stability. ***This surely has to be a Very Special Circumstances case.*** **This replacement dwelling will also have a smaller overall footprint area and volume than the structures currently on the site which it will replace.**

10.06. This and the previous proposal are both similar to planning application reference **20200230** in other respects as well. The external materials chosen to include weatherboarded walls on red brick plinths and plain clay tiles on steeper 35° pitch roofs will be exactly the same as approved planning application reference **20200230**.

10.07. The existing dwelling has a footprint area of 148.43m², according to the case officer's delegated report for my clients' previous proposal, and with a volume of 572.387m³. The proposed replacement dwelling for this application will have a footprint area of 160.447m² and a volume of 586.073m³. The proposed replacement dwelling will therefore, have a footprint area of 12.017m² or 8.096% larger than the original dwelling and a volume of 13.686m³ or 2.391% larger than the original dwelling.

10.08. The existing dwelling and specified outbuildings, (using my calculated dwelling footprint area of 138.294m²), have a combined footprint area of 247.623m² and a combined volume of 854.141m³. This proposal, including the retained garage and outbuilding, has a combined footprint area of 238.586m² and a combined volume of 787.047m³. **When the total footprint**

areas and the volumes are included, the proposal will have a footprint area 9.037m² or 3.79% smaller than the existing and a volume 67.094m³ or 7.86% smaller than the existing. Compare these figures with planning approval reference **20200230**, where the Borough Council permitted an increased footprint area of 56.79% greater than the original dwellings and an increased volume of 47.511% greater than the original dwellings.

10.09. The proposed footprint and volume increase for this application (8.096% & 2.391% respectively in the case of the replacement dwelling on its own) are insignificant compared to those which the Council permitted under planning approval reference 20200230 (56.79% & 47.511% respectively). I would argue, in a manner similar to the case put forward by the agent for application reference **20200230**, that the impact of the additional overall floorspace on the Green Belt is outweighed by the removal of the outbuildings on the site and that the total footprint area and volume of the proposed replacement dwelling and retained outbuildings will be lower than those which presently exist. I would similarly argue that, if the Council cannot agree that the proposal is appropriate development, then the **overall reduction in floor area and volume should be treated as a Very Special Circumstances case.**

10.10. I have already explained that the increase in the footprint area of the proposed replacement dwelling when compared to that of the existing dwelling (a matter of only 8.096%) is explained by the need for external walls to meet the requirements of Part L of the Building Regulations and for structural stability reasons. (See paragraph 9.25). This again has to be another reason for this application **to be treated as a Very Special Circumstances case.**

10.11. I will again state, at the risk of repeating myself, that **the proposed replacement dwelling and retained outbuildings will have a smaller footprint area and volume than the existing dwelling and associated outbuildings**, not even taking into account the additional removal of the three existing greenhouses and a canopied area. The replacement dwelling will be set at a lower level than the existing dwelling. **The replacement dwelling will have lower eaves and ridge heights than the existing dwelling, both in physical terms and also from actual measurements taken from external ground level. It will have smaller massing and it will be less bulky than the existing dwelling and associated outbuildings.** This again has to be a reason for this application **to be treated as a Very Special Circumstances case.**

11.0 Comparison of Areas and Volumes at “Nutfield Farm”

11.01. The footprint areas and volumes of the proposed dwelling and retained outbuildings will be:-

Proposed Dwelling & Retained Outbuildings		
	Footprint (m ²)	Volume (m ³)
Total footprint area & volume of existing garage	56.775	158.245
Total footprint area & volume of existing shed 2	21.364	42.728
Total footprint area & volume of proposed dwelling	160.447	586.073
Total footprint area & volume of proposed dwelling and retained outbuildings	238.586	787.047

11.02. The footprint areas and volumes of the existing and proposed dwellings and outbuildings are / will be: -

Comparison areas and volumes between existing and proposed dwellings and outbuildings		
	Footprint Area (m ²)	Volume (m ³)
Existing dwelling and specified outbuildings	247.623	854.141
Proposed dwelling and specified outbuildings.	238.586	787.047

11.03. It can be seen from the above, that the proposal will have a total footprint area 9.037 m² and a volume 67.094 m³ smaller than the existing property on the site.

11.04. The following is relevant with regard to height comparisons between the existing and proposed dwelling: -

	Existing Dwelling	Proposed Dwelling	“Merryhill Farm”	“Nutfields”
Finished floor level (m) AOD	152.46	151.3		
Eaves height (m) AOD	154.77	153.634	153.57	
Ridge height (m) AOD	156.83	156.574 to higher roof 155.489 to lower roofs	157.03	158.41

11.05. It can be seen from the above that the ridge height of the proposed replacement dwelling will be lower than the existing dwelling by 256mm at its highest point and by 1.341 metres when measured from the more extensive ridge points of the lower roofs. It will be lower than “Merryhill Farm” by 456mm and it will be lower than “Nutfields” by 1.836 metres. The eaves line will also be lower than the existing dwelling by over a metre. All this has been achieved, even by having roofs of a steeper pitch than the existing dwelling and covered with far higher quality materials, which are more suited to this AONB and Green Belt location.

11.06. Taking all of the above facts into account, the overall impact on the Green Belt for the proposal will be less than the impact the existing dwelling and outbuildings currently have on it. The proposal will have a positive overall impact on its Green Belt location with a design, scale, siting, landscaping and use of materials which are much better suited to the neighbourhood than the existing structures. The resultant replacement dwelling will also be considerably more energy efficient to help create a sustainable and new green home for my clients.

12.0 Access

- 12.01.** The finished ground floor level of the proposed dwelling will closely relate to the existing site levels.
- 12.02.** Access to the site will be via the existing access point onto Priestwood Road.
- 12.03.** Access to the front door will be via a ramped path with a maximum gradient of 1 in 18. The floor layout will conform to the requirements of Part M of the Building Regulations, where the living accommodation is wheelchair accessible and the bathroom will have an outward opening door.

13.0 Amenity Space

- 13.01.** Amenity space will be provided within the existing boundary hedgerows. If any fences require repair, they will be renewed to match the existing.
- 13.02.** Hard paved areas for refuse storage are indicated on the site plan.
- 13.03.** The frontage will be provided with soft landscaped areas and they will be enhanced by the removal of the large amount of existing concrete hard landscaping.

14.0 Environmental Considerations

- 14.01.** This property would not be designated “Contaminated Land” within the meaning of Part IIA of the Environmental Protection Act 1990, in view of its continuing residential use.

15.0 Crime Prevention Measures

- 15.01.** Crime prevention measures, Circular 1/2006 “Guidance on changes to the Development Control System” states in Paragraph 87, that Design and Access Statements for outline and detailed applications should demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places as set out in Safer Places – the Planning System and Crime Prevention (ODPM/Home Office, 2003). The new dwelling will be adequately secured via a modern alarm and the layout of rooms and windows will provide good security and overlooking of the main access.

16.0 Climate Change

- 16.01.** The supplement to PPS1 “Planning and Climate Change” requires local planning authorities to request of applicants, through their Design and Access Statements, how the proposed development will contribute to Key Planning Objectives set out in PPS1 and relevant DPD policies consistent with it.
- 16.02.** The replacement dwelling will be provided with an air source heat pump to provide space heating and hot water. This will be supplemented by an “Ecodesign” multi-fuel burning stove situated in the living room.
- 16.03.** The site will actively contribute towards a reduction in carbon dioxide emissions, with considerably enhanced levels of insulation, as advocated by paragraph 42 of the supplement to PPS1.

17.0 Planning Context

17.01. This application has been prepared having all due regard to the relevant planning policies in place for the site.

17.02. I consider that the following Gravesham Borough Council policies are relevant to the application: -

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development
- CS02 - Scale & Distribution of Development
- CS12 - Green Infrastructure
- CS18 - Climate Change
- CS19 - Design & Development Principles

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- P3 - Vehicle Parking Standards
- C12 - Replacement Dwellings in the Countryside
- C13 - Extensions in the Countryside

17.03. I consider that the following have a material consideration: -

National Planning Policy Framework (2021)

- Section 2 - Achieving Sustainable Development
- Section 12 - Achieving Well-Designed Places
- Section 13 - Protecting Green Belt Land
- Section 15 - Conserving and Enhancing the Natural Environment

Kent Design Guide

Kent Downs AONB Management Plan:

- SD2 - 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.
- SD7 - New projects, proposals and programmes shall conserve and enhance tranquillity and where possible dark night skies.
- SD8 - 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**.

17.04. I will now refer to all of the above in turn.

17.05. Gravesham Local Plan Core Strategy (September 2014):

- **CS01 - Sustainable Development**

Paragraph 4.1.6 states that *planning applications that accord with the policies in the development plan for Gravesham will be approved without delay unless material considerations indicate otherwise. Paragraph 4.1.7 goes on to state that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy.*

The NPPF states that there are three overarching objectives to achieve sustainable development including: -

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

This proposal is for a replacement dwelling where a dwelling already exists. It will therefore meet the economic objective. It will also meet the social objective for the same reason and it will also meet the environmental objective by using sustainable materials and by adopting the highest levels of insulation. It will also use renewable energy by utilising a heat pump for space heating and hot water.

- **CS02 - Scale & Distribution of Development**

Paragraph 4.2.24 states that *the development strategy for the Borough is to retain and improve the existing stock of housing.*

The existing dwelling is clearly of inferior construction and is in need of replacement by a new dwelling that is built to current Codes of Practice and which meets the insulation requirements of Part L of the Building Regulations to help build a green economy. This proposal will clearly help to improve the housing stock within the Borough.

- **CS12 - Green Infrastructure**

Paragraph 5.7.26 refers to *the conservation, restoration and enhancement of the overall landscape character* and it particularly refers to *the Kent Downs Area of Outstanding Natural Beauty Management Plan, and the Gravesham Landscape Character Assessment*, which are relevant to this site.

The replacement of an inferior cedar shingle clad and artificial slate roofed dwelling and motley collection of outbuildings by a purpose-built and well-designed replacement dwelling will undoubtedly enhance the overall landscape character of the area. It is regrettable that the Borough Council did not consider that the proposed replacement garage and integral mower store submitted as part of the previous proposal would also make a better acceptable alternative to the retention of the existing garage. Off-street garaging and a storage area for the ride-on motor mower are essential to the continuing C3 use of the site and that is the reason why the existing garage and one of the outbuildings have to be retained as a part of this submission. **If the Council would like to reconsider their original objection to the replacement garage and mower store, I would be happy to consider this as an alternative solution by way of amending the planning submission.** My clients are also prepared to further enhance the site and to aid biodiversity by planting additional trees, turning part of the site over to the planting of native wildflowers and by the siting of bird and bat boxes and a bug hotel.

- **CS18 - Climate Change**

This policy focuses on *flood risk, water quality, sustainable drainage and surface water run-off, water demand management, carbon reduction*. Paragraph 5.15.8 in particular states that *there is a strong case for seeking improvements to achieve more sustainable new development*.

The proposal will use sustainable building methods and building materials to help to address the causes and effects of climate change.

- **CS19 - Design & Development Principles**

Paragraph 5.15.14 states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.

The proposal will meet this requirement by the use of sustainable materials and with a design that is embedded in the local vernacular by the use of traditional local materials including feather-edge oak weatherboarding, red stock brick and plain clay roof tiles. The present structures are neither attractive; nor are they locally distinctive.

17.06. Saved Policies in the Gravesham Local Plan First Review (November 1994):

- **P3 - Vehicle Parking Standards**

There will be no parking or highways issues related to this proposal. The existing garage can accommodate two cars and there will be additional and sufficient space for parking and also for turning on the gravel drive. My clients wish to retain gravel surfacing to the driveway, which is a traditional treatment and which is also appropriate to this rural location. The gravel surfacing will be retained by the granite sett edging, together with the tarmacadam surfacing on the apron at the site entrance. The gravel will not spill over onto Priestwood Road. The proposal will therefore, comply with Gravesham Borough Council's adopted parking standards (SPG 4) (2006).

- **C12 - Replacement Dwellings in the Countryside**

Policy C12 states that there will be a strong presumption against allowing the replacement of existing dwellings which will only be set aside if the following criteria are satisfied: -

(i) The existing dwelling must be an "original dwelling" in permanent use as a dwelling. Proposals for the replacement of dwellings which are not "original" but which have gained immunity from the enforcement of planning control will be considered on their individual merits, having regard to their origins, their location and the nature of the accommodation they currently provide.

(ii) The existing dwelling must be in an appropriate location, meaning that it must be well related to existing roads and to essential services and must be in or close to an established rural settlement. The only exception to this criterion will be where the proposed replacement dwelling is required on the site for an agricultural worker, where the standard agricultural occupancy condition will be imposed.

(iii) The replacement dwelling must be of similar scale and mass to the existing dwelling and must be no larger than the existing dwelling, unless it can be demonstrated that modest enlargement+ is required to allow the provision of essential basic amenities such as a bathroom, toilet or kitchen, which currently do not exist or are clearly inadequate or to meet the special needs of the occupants.

(iv) The internal layout of the replacement dwelling shall not be such as to facilitate its later subdivision.

(v) The replacement dwelling should normally occupy the same site as the existing dwelling. Where it is agreed that the replacement dwelling may be located elsewhere on the plot, adequate safeguards will be required to ensure the demolition of the existing dwelling.

(vi) The existing or proposed means of access, including access for firefighting appliances, must be satisfactory.

(vii) The existing or proposed site drainage and means of soil and waste disposal must be satisfactory.

The existing dwelling has lawful C3 use and it is in an appropriate location. The proposal is for a bungalow and not for a two-storey structure and it will be of a similar size to the existing dwelling.

The proposed internal layout of the replacement dwelling will not facilitate its later subdivision.

The proposed footprint areas and volumes of the proposed replacement dwelling and retained outbuildings will be less than those of the existing dwelling and outbuildings and they will also be lower. Mass and bulk will therefore, be less than the existing. The existing and proposed means of access for fire engines are fully in accordance with the County of Kent Act 1981. The existing cesspool will be replaced by a sewage treatment plant and this will be of benefit to the environment. Surface water will be disposed of by soakaways which are ideally suited to the chalk substrate on which the land lies.

- **C13 - Extensions in the Countryside**

The proposal is for a replacement dwelling and not an extension. It will nevertheless, be of a similar size to the existing dwelling.

17.07. National Planning Policy Framework (2021)

Section 2 - Achieving Sustainable Development

See my comment above regarding Gravesham Local Plan Core Strategy Policy CS01 - Sustainable Development

Section 12 - Achieving Well-Designed Places

See my comment above regarding Gravesham Local Plan Core Strategy Policy CS19 - Design & Development Principles

Section 13 - Protecting Green Belt Land

Paragraph 149 defines the construction of new dwellings as inappropriate in the Green Belt apart from certain exceptions including: (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

The proposal is for a new building (a replacement dwelling) in the same use and not materially larger than that being replaced. The proposal therefore, complies with this section.

Section 15 - Conserving and Enhancing the Natural Environment

See my comment above regarding Gravesham Local Plan Core Strategy Policy CS12 - Green Infrastructure.

17.08. Kent Design Guide

The proposal will comply with all the relevant provisions contained in the Kent Design Guide and which are also detailed in the above policies. These include: - *respecting the context and character of the area, sustainability, creating an attractive, safe and secure place, mitigating against the effects of climate change, landscape setting, designing in context, hierarchy of form, attention to detail, choice of building materials and energy efficiency.*

17.09. Kent Downs AONB Management Plan:

***SD2** - 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.*

The existing dwelling and outbuildings do not fit in well with this policy. The previous proposal would have replaced that dwelling and all the outbuildings by a far superior design, appropriate to its setting and with the use of materials which are in accordance with the AONB design guidance. The Borough Council's case officer took exception to the proposed replacement garage and integral mower store. That is lamentable because of the only other available alternative to my clients, which is a far less satisfactory proposition. It means that this proposal has no other option but to retain the existing garage and one of the other outbuildings. The ride on mower will be relocated to the existing garage. The replacement dwelling will enhance the **Kent Downs AONB** by replacing the existing dilapidated dwelling with a far superior design, appropriate to its setting and with the use of materials which are in accordance with the AONB design guidance and its siting will fit in well with this policy.

***SD7** - New projects, proposals and programmes shall conserve and enhance tranquillity and where possible dark night skies.*

The proposal will set the replacement dwelling further away from Priestwood Road than the existing dwelling and outbuildings. There will be no external lighting within the proposed design to address the dark night skies requirement. The proposal will therefore, be a more tranquil place in which to live.

***SD8** - 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.*

The proposal will respect the **Kent Downs AONB** in all of the above respects and it will not impact negatively on them.

17.10. Supplementary Planning Guidance: Gravesham Householder Extensions/Alterations Design Guidance (SPD) (2021)

The Borough Council's case officer referred to this in the delegated report for the previous submission. The published guidance, as its title suggests, is for extensions or alterations to existing dwellings. As both this and the previous submission are for replacement dwellings, this guidance is not relevant to the consideration of this and my clients' previous applications.

18.0 Summary

- 18.01.** This proposal will have a positive impact on the character of the area, by virtue of the fact that a contemporary building of a high-quality design will occupy the site. The proposal will be in keeping with the area and street scene in terms of design, height, scale, and massing, and it will not detract from the essential character of the area.
- 18.02.** The scale and massing of the replacement dwelling will be in keeping with its surroundings. Its design will respect the character and appearance of the neighbourhood and it will safeguard the privacy and amenity of adjoining residents.
- 18.03.** Materials used will be of excellent quality and sympathetic to the area concerned. The external materials chosen to include weatherboarded walls on red brick plinths and plain clay tiles on steeper 35° pitch roofs will be exactly the same as approved planning application reference **20200230** and they are entirely appropriate for use in this area.
- 18.04.** It will comply in all respects with the Council's planning policy requirements for replacement dwellings and their associated outbuildings located within the Metropolitan Green Belt. It will also enhance the setting of this land within the ***Kent Downs Area of Outstanding Natural Beauty***.
- 18.05.** It can be seen in the case of planning application reference **20200230** that the Borough Council approved proposals for replacement dwellings in the same AONB and Metropolitan Green Belt as this proposal, with larger footprint areas and volumes than those which they replaced. The greater size was offset by the overall reduction of footprint area and volume after the removal of the associated outbuildings was factored into the equation. This proposal is for a replacement dwelling with a similar internal floor area to the existing but with a slightly larger footprint area, due to the need to have thicker external walls, which are required by Part L of the Building Regulations. It will also have a smaller overall footprint and volume than those structures currently on the site which it will replace. **This is a Very Special Circumstances case.**
- 18.06.** The proposal for a replacement dwelling and the removal of the existing dwelling, two outbuildings, three greenhouses and a canopied area will have a lesser impact on the

Metropolitan Green Belt than the existing dwelling and outbuildings it will replace and it cannot be regarded as inappropriate development. (NPPF paragraph 147).

- 18.07.** The proposal will have a smaller footprint and a smaller volume than the existing dwelling and outbuildings it will replace. The slightly increased footprint required for the replacement dwelling on its own is due to the need for thicker external walls required by Part L of the Building Regulations and for structural stability reasons. As such, it should be treated as a Very Special Circumstances case. (NPPF paragraph 148).
- 18.08.** The proposal is to replace an existing dwelling by another of the same use. The overall footprint area and volume will be smaller than the existing structures to be replaced. (NPPF paragraph 149(d)).
- 18.09.** The redevelopment of the site would have a lesser impact on the openness of the Green Belt than the existing development. (NPPF paragraph 149(g)).
- 18.10.** The redevelopment of the site would reduce the impact of development on the Green Belt with regard to its openness and with an overall enhancement to the visual quality of the landscape.
- 18.11.** There will be no intensification of the residential use of the site. My clients live at “**Nutfield Farm**” and the replacement dwelling would be for their use. The existing 4-bedroom property would in fact be reduced to a 3-bedroom property. The existing bungalow would be replaced by another bungalow and this would be lower than the existing property. It would also be set considerably further back from the road than the existing property and it would relate better in its new position to the neighbouring properties on both sides, “**Merryhill Farm**” to the north and “**Nutfields**” to the south. Both of these properties have gabled roofs with brick and weatherboarded external walls and the replacement dwelling would relate well stylistically to them.
- 18.12.** The site is extremely well-screened from any public vantage points, due to landform and the presence of trees and a high conifer hedge on the boundary with Priestwood Road. The replacement dwelling, with its lower height and further distance from the road will therefore, not be prominent in the wider landscape. It will in fact have a lesser impact on the wider

landscape than the existing dwelling and its associated outbuildings. The high quality materials that have been specified and the design will ensure that the redevelopment of the site will amount to an overall enhancement.

18.13. The proposal will fully comply with Gravesham Local Plan Core Strategy Policy CS19 and NPPF Section 12. It will be *“visually attractive, fit for purpose and locally distinctive”*. It will *“conserve and enhance the character of the local built, historic and natural environment”* and it will *“integrate well with the surrounding local area”*.

18.14. The proposal will provide a much better quality and modern residential development than presently exists. Consolidation of the built form and a careful design approach will enhance the appearance of the site and the locality. It will consolidate and enhance an existing residential site.

18.15. If the Borough Council does not agree with my assessment that the proposal is appropriate development, then the application has to be treated as a ***‘Very Special Circumstances’*** case for the following reasons: -

- *An overall reduction in floor area and volume, removal of outbuildings and the consolidation of the built form on the site will provide an overall enhancement to the openness and visual quality of the site as a whole.*

18.16. For all these reasons, the Borough Council is requested to grant Full Planning Permission for this development.

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RIBA Chartered Practice

Appendix A: Table of areas and volumes

Nutfield Farm, Priestwood Road, Harvel													
Areas & Volumes													
			length (m)	breadth (m)	footprint (m²)	total footprint area of each building (m²)	total footprint area of all buildings (m²)	area (m²)	height (m)	volume (m³)	total volume of each building (m³)	total volumes (m³)	internal floor area (m²)
Building	Section	Sub-Section											
Existing Dwelling													
	main building												
		Building to sloping part	15.400	8.690				133.826	0.945	63.233			
		Main bulk of building	15.450	8.740	135.033			135.033	2.371	320.163			
		Eaves line	15.850	9.340				148.039	0.190	28.127			
		Pitched roof	15.850	9.340				148.039	2.058	152.332			
	flat roof porch												
		Main bulk of building	2.630	1.240	3.261			3.261	2.421	7.895			
		Eaves line	2.830	1.040				2.943	0.216	0.636			
Total footprint of existing dwelling						138.294							
Total volume of existing dwelling											572.387		
Internal floor area of existing dwelling													130.760
Existing Garage													
	main building deepest section												
		Main bulk of building	5.025	5.545	27.864			27.864	2.190	61.021			
		Slither of building between lower and higher eaves	5.025	2.272				11.417	0.268	3.060			
		Eaves line	5.125	5.545				28.418	0.156	4.433			
		Pitched roof 1	5.125	3.273				16.774	0.950	7.968			
		Pitched roof 2	5.125	2.272				11.644	0.682	3.971			
	main building shallower section												
		Main bulk of building	4.900	4.545	22.271			22.271	2.458	54.741			
		Eaves line	4.900	4.545				22.271	0.156	3.474			
		Pitched roof	4.900	4.545				22.271	0.682	7.594			
	side section lean to												
		Main bulk of building	1.855	3.580	6.641			6.641	1.211	8.042			
		Pitched roof	1.855	3.580				6.641	1.187	3.941			
Total footprint of existing garage						56.775							
Total volume of existing garage											158.245		
Existing Mower Store													
		Building to sloping part	4.300	3.600				15.480	0.550	4.257			
		Main bulk of building	4.300	3.600	15.480			15.480	1.855	28.715			
		Pitched roof	4.300	3.600				15.480	0.920	7.121			
Total footprint of existing mower store						15.480							
Total volume of existing mower store											40.093		
Existing Shed 1													
		Building to sloping part	5.380	2.920				15.710	0.550	4.320			
		Main bulk of building	5.380	2.920	15.710			15.710	1.855	29.141			
		Pitched roof	5.380	2.920				15.710	0.920	7.226			
Total footprint of existing shed 1						15.710							
Total volume of existing shed 1											40.688		

Nutfield Farm, Priestwood Road, Harvel													
Areas & Volumes													
			length (m)	breadth (m)	footprint (m²)	total footprint area of each building (m²)	total footprint area of all buildings (m²)	area (m²)	height (m)	volume (m³)	total volume of each building (m³)	total volumes (m³)	internal floor area (m²)
Building	Section	Sub-Section											
Existing Shed 2													
		Building to sloping part	5.450	3.920				21.364	0.300	3.205			
		Main bulk of building	5.450	3.920	21.364			21.364	1.500	32.046			
		Pitched roof	5.450	3.920				21.364	0.700	7.477			
Total footprint of existing shed 2						21.364							
Total volume of existing shed 2											42.728		
Total footprint of existing dwelling, garage, mower store, shed 1 & shed 2							247.623						
Total volume of existing dwelling, garage, mower store, shed 1 & shed 2												854.141	
Proposed Dwelling													
	Dining Room, Kitchen, Utility & Bedroom 3												
		Brick wall below weatherboarding	13.210	4.610				60.898	0.600	36.539			
		Weatherboarded wall	13.310	4.710	62.690			62.690	1.709	107.137			
		Eaves line	13.610	5.010				68.186	0.175	11.933			
		Pitched roof	13.610	5.010				68.186	1.855	63.243			
	Bedroom 1, Ensuite Bathroom, Bathroom, Linen Cupboard & Bedroom 2												
		Brick wall below weatherboarding	13.210	4.610				60.898	0.600	36.539			
		Weatherboarded wall	13.310	4.710	62.690			62.690	1.709	107.137			
		Eaves line	13.610	5.010				68.186	0.175	11.933			
		Pitched roof	13.610	5.010				68.186	1.855	63.243			
	Living Room & Hall												
		Brick wall below weatherboarding	7.890	4.590				36.215	0.600	21.729			
		Weatherboarded wall	7.810	4.490	35.067			35.067	1.709	59.929			
		Eaves line	8.110	4.190				33.981	0.175	5.947			
		Pitched roof	8.110	4.190				33.981	2.940	49.952			
		Thin section of roof over hall & living room	8.110	0.805				6.529	2.940	9.597			
		Hipped section (1) of roof over hall and living room above smaller roof intersection	2.986	1.550				4.628	1.085	1.255			
		Central section (2a) of roof over hall and living room below smaller roof intersction	2.986	1.550				4.628	1.855	8.585			
		Hipped end sections (2b) of roof over hall and living room below smaller roof intersction	2.562	1.550				3.971	1.855	3.683			
		Less volume of smaller roof passing through hipped end	8.110	2.355				19.099	1.855	17.714			
		Thin section of roof over hall & bedroom 1	8.110	0.805				6.529	2.940	9.597			

Nutfield Farm, Priestwood Road, Harvel													
Areas & Volumes													
			length (m)	breadth (m)	footprint (m²)	total footprint area of each building (m²)	total footprint area of all buildings (m²)	area (m²)	height (m)	volume (m³)	total volume of each building (m³)	total volumes (m³)	internal floor area (m²)
Building	Section	Sub-Section											
		Hipped section (1) of roof over hall & bedroom 1 above smaller roof intersection	2.986	1.550				4.628	1.085	1.255			
		Central section (2a) of roof over hall & bedroom 1 below smaller roof intersction	2.986	1.550				4.628	1.855	8.585			
		Hipped end sections (2b) of roof over hall and living room below smaller roof intersction	2.562	1.550				3.971	1.855	3.683			
		Less volume of smaller roof passing through hipped end	8.110	2.355				19.099	1.855	17.714			
Total Footprint of new dwelling						160.447							
Total volume of new dwelling											586.073		
Internal floor area of new dwelling													136.314
Total footprint of new dwelling, retained garage & retained shed 2							238.586						
Total volume of new dwelling, retained garage & retained shed 2												787.047	